Core Strategy Supplementary Consultation, June & July 2012

Report of Consultation

Introduction

Charnwood Borough Council is preparing a Core Strategy development plan document as part of its Local Plan. Once adopted, this document will provide the vision and strategic planning policy framework for Charnwood guiding the future development of the Borough until 2028.

A series of other planning documents detailed in the Council’s Local Development Scheme will follow on from the Core Strategy and will be prepared in general conformity with its policies.

Work on the Core Strategy commenced in early 2004 and since then the Council has undertaken a series of consultation events with local communities and other stakeholders:

- Issues and Options (June 2005)
- Planning for Our Next Generation – Preferred Options Report (February 2006)
- Planning for Our Next Generation – Alternative Strategies (September 2007)
- Key Stakeholder topic based workshops (July-August 2008)
- Core Strategy Further Consultation (October 2008)

In June 2012 a Core Strategy Supplementary Consultation was undertaken to explore options for housing growth over an extended plan period. The comments made during this consultation will be used, together with those from previous consultations (in particular those from the Core Strategy Further Consultation Report) to help prepare the Draft Core Strategy for publication later this year.

How did we consult you?

To publicise the publication of the Core Strategy Supplementary Consultation Report and associated consultation period between 11th June 2012 and 8th July 2012 the Council:

- Sent a letter or email to the people registered on the Council’s Local Plan database informing them of the publication of the supplementary consultation report and how they could get involved;
- Sent email alerts to people registered to receive alerts via the Charnwood Local Plan Email Alert service;¹
- Created a dedicated webpage with all the consultation documents available to download on the Council’s website and opened a dedicated telephone line;
- Created an online questionnaire for people to make their comments;
- Issued two press releases announcing the launch and an extension to the consultation (and responded to subsequent press queries).

¹ http://www.charnwood.gov.uk/pages/lpsignup
The Council also held three workshops for local organisations, neighbouring authorities, key agencies, developers, Parish and Town Councils, Councillors and community groups during the consultation period to explain the Supplementary Consultation Report and to enable people to ask questions. Around 60 people attended the workshops. These events are set out below:

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<tr>
<th>Date</th>
<th>Workshop</th>
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<tr>
<td>Monday 18th June</td>
<td>Key Bodies &amp; Organisations Workshop</td>
<td>2pm – 4pm</td>
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<tr>
<td>Tuesday 19th June</td>
<td>North Charnwood Community Workshop</td>
<td>6pm – 8pm</td>
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<tr>
<td>Wednesday 20th June</td>
<td>South Charnwood Community Workshop</td>
<td>7pm – 9pm</td>
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We also held a Briefing for all Charnwood Borough Councillors ahead of the consultation and promoter presentation evening for Charnwood Members, County Members for Charnwood and City Members with a ward adjoining the Borough.

What did we receive from you?

The response to the Core Strategy Supplementary Consultation Report has been considerable with over 400 responses and nearly 900 individual comments through the various channels of consultation. A summary of the number of comments on each options and section of the consultation document is set out below:

Draft Consultation Statistics

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<th>Comments Received by Options</th>
<th>Number of Respondents</th>
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<td>Option 2 - North of Birstall and North of Glenfield</td>
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<td>Option 3 - North of Glenfield and South &amp; East of Syston</td>
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Responses to the Core Strategy Supplementary Consultation document were submitted to the Council either by email, telephone, letter or using the Council’s online consultation portal. The format of responses are summarised below and show that the majority of people responded using the questionnaire on the online consultation portal. Although, the advertised consultation period extended between 29th June 2012 and 8th July 2012, comments continue to be submitted and will be taken into account.

<table>
<thead>
<tr>
<th>Type</th>
<th>Number of Respondents</th>
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<tbody>
<tr>
<td>Online</td>
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<tr>
<td>Email</td>
<td>138</td>
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<tr>
<td>Letter</td>
<td>39</td>
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<tr>
<td>Telephone</td>
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<td>Total</td>
<td>410</td>
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**How have we dealt with your written comments?**

All the comments have been read and attributed to the appropriate option raised in the Supplementary Consultation Report. Most of the comments submitted directly relate to specific options proposed but others include responses to the housing numbers, the proposed Sustainable Urban Extensions and alternative options. A number of responses were general in nature or did not identify a specific option. These have been recorded as general comments. The individual comments can be accessed through the consultation tool by following this link: [http://consult.charnwood.gov.uk/portal](http://consult.charnwood.gov.uk/portal)

The following sections of this report identify the main issues and comments made on each of the options presented in the supplementary consultation and a summary of the ‘any other comments’ results.
Introduction

44 Respondents

The majority of the comments submitted expressed concerns relating to the strategy being pursued.

A summary of the comments is set out below.

Environmental Issues

The service centres have already been overdeveloped, and should not take further growth as this could lead to coalescence between Leicester and Loughborough.

Transport Issues

The LLITM traffic model has not been validated by the Highways Agency. There is a significant difference in the mitigation achieved for option 4 and options 1, 2 & 3.

General Strategic Issues

Respondents felt that the framework provided by the Regional Plan should not be followed and that a strategy based on the principle of urban concentration was no longer appropriate. Some of the criticisms of the Regional Plan related to the fact that its evidence base was now considered to be out of date. Doubts were also expressed about the principle and deliverability of the officer's recommendations for Sustainable Urban Extensions.

Some felt that there was a lack of clarity over the scope and purpose of the consultation document. The consultation period was also considered to be too short.

The 'top down' approach is based on targets for housing and industrial development which are no longer appropriate for the Borough. The economic downturn should lead to a reassessment of the housing requirement and employment assumptions.

The Sustainability Appraisal identifies a high number of negative impacts of development compared to a lower number of benefits.

The presumption that the Borough should accommodate high levels of growth was criticised as was the Consultation Document’s interpretation of ‘sustainability’.

In the light of changed circumstances some development interests also called for a fundamental review of the strategy and concerns were expressed that the SUEs may not deliver the required housing levels and consequently the Borough should be planning for a larger quantum of development over a longer time period.

The following alternative options were suggested by respondents that commented on the introduction:

One option suggested was that the housing requirement for North Charnwood should not be met.
Development of brownfield sites such as Wymeswold airfield plus smaller, appropriately scaled developments around all existing settlements should be considered as should development on the eastern side of Loughborough.
Option 1: North of Birstall

32 Respondents

The majority of those comments did not support the option for an additional direction for growth to the north of Birstall. The key concerns related to the retention of the A46 as a boundary to development and the impact of coalescence on the Soar Valley villages, particularly between Birstall and Rothley. There were also concerns about the impact on infrastructure particularly transport infrastructure.

The following issues were raised by respondents that did support the option for an additional direction for growth:

General Strategic Issues

There was support for the proposal from the landowner who drew attention to it being a sequentially preferable area of search free of planning policy constraints, with no land ownership, land assembly or physical constraints at a strategic location close to the important A6 / A46 crossroads. It was also noted that the infrastructure was already in place and the development would have easy access to shops and other facilities including the recently constructed park and ride site.

The following issues were raised by respondents that did not support the option for an additional direction for growth:

Environmental Issues

The proposed development is on greenfield land and it would have a negative effect on landscape character and tranquillity. Development would lead to more pollution and a reduction in air quality and general environment for existing Birstall residents.

Development could affect the setting of Rothley Park (to the north of the area) which includes a number of designated heritage assets.

Farmland would be lost and it should be retained for growing food that will be required for an expanding population. The drainage system will not be able to cope with more frequent heavy downpours and additional development would exacerbate this problem.

Social Issues

Birstall is already at capacity as there has been excessive development in the area which has not been accompanied by adequate facilities, particularly schools, health and leisure facilities.

Transport

Housing development off the A6 had already created substantial traffic congestion and further development would exacerbate the problem. The additional housing at Ashton Green will also add to the congestion. The park and ride facility is not widely used by Birstall residents or visitors. In addition, the limited parking facilities in Birstall village will not be able to cope with the additional development.
The proposed Wanlip bypass tries to address the problem by providing a new link to the development. However, the narrow road is already busy and would be totally inadequate for the potential amount of traffic.

Further significant growth at Birstall may result in such potentially significant and wide ranging strategic impacts on the highway network that they are unacceptable to the local highway authority. Development of 1500 or 2000 dwellings and the proposed mitigation is likely to have some negative impacts on use of the A6 / A46 and surrounding, more local, routes.

**General Strategic Issues**

This type of site is dislocated from other settlements and would be contrary to the urban concentration strategy underpinning the Core Strategy.

The A46 provides physical separation from the Principal Urban Area while the A6 also divides Birstall into two communities, presenting a major obstacle to the integration of the new and the old communities. Development to the north of the A46 would also lead to coalescence of Birstall and Rothley.

The following alternative options were suggested by respondents that commented on this option:

Alternative options suggested by respondents included developing brownfield sites in urban areas and other sites in proximity to the A46 which were more suitable.
Option 2: North of Birstall and North of Glenfield

25 Respondents

The majority of respondents did not support this option. The key concerns related to the coalescence of local villages and the loss of open countryside.

The following comments were made by respondents that did support the option as an additional direction for growth:

Transport

Birstall is as big as it can be taking into account the current range and capacity of services available. However, there is land available up to the A46 which is capable of considerable growth and would make use of the Park and Ride and the road infrastructure already in place.

General Strategic Issues

There will not be coalescence with Thurmaston because of the Soar Valley, inherent flood risk and in particular Watermead Park. If the need for growth cannot be met elsewhere in the Borough then this area has fewer downsides than most.

The infrastructure is in place with good access to roads and facilities. The site is better equipped to take the burden of 2143 houses than, for example, south and East of Syston.

It may be possible that development in this area (North of Birstall) could be mitigated through sensitive design as part of a master planning process.

The following issues were raised by respondents that did not support the option for an additional direction for growth:

Environmental Issues

Glenfield has already been subjected to a lot of growth and these proposals would just exacerbate urban sprawl and cause a merger with the City and the coalescence of Glenfield, Kirby Muxloe and Anstey. The villages should retain their sense of identity.

Birstall is divided into two communities by the A6. This presents a major obstacle to the integration of the new and the old communities.

The Green Wedge north of Glenfield should be protected to maintain these separate communities; to provide a green lung for nearby residents; to provide access to recreational space and fresh air; and to maintain the Rothley Brook wildlife corridor.

There will not be enough land for housing and associated facilities given the amount of floodplain in this location. Development will lead to more pollution and a reduction in air quality and general environment for existing Birstall residents.

Development could affect the setting of Rothley Park (to the north of the area) which includes a number of designated heritage assets.
Transport

This option will only exacerbate traffic congestion on the A46 because of the major housing development to the south of the A46 at Ashton Green.

New housing at Birstall has already created more traffic congestion on the A6 and the A50/A46 Junction is already a bottle-neck. The County Hall traffic island, where the development would be located, is also congested.

The park and ride facility at Birstall is not used by Birstall residents and is not well patronised generally. The proposed Wanlip Bypass would not be able to cope with additional traffic.

Social Issues

Development at Glenfield will not be large enough to justify the new infrastructure that will be needed. Local services in Beaumont Leys and Glenfield are beyond walking distance.

Consideration needs to be given to what will be done to cope with the strain on existing services such as the health centre, local police station and primary schools in Glenfield.

Economic Issues

It is not clear where the residents will work. The nearby New Parks area already has high unemployment levels.

General Strategic Issues

None of the proposed mitigation to manage the impact of growth is guaranteed. This Option is not in strict conformity with the Regional Plan and brownfield sites in urban areas should be developed first.
**Option 3: North of Glenfield and South and East of Syston**

30 Respondents

The majority of respondents did not support this option for an additional direction for growth. The key concerns raised related to local identity, coalescence and loss of a green wedge.

The following comments were made by respondents that did support the option as an additional direction for growth:

**Economic Issues**

Thurmanston is in need of regeneration and could be revitalised by growth proposals there, but not to the extent that it merges with Syston.

The following issues were raised by respondents that did not support the option for an additional direction for growth:

**Environmental Issues**

Glenfield has already been subjected to a lot of growth and these proposals would just exacerbate urban sprawl and the loss of village identity. There is a risk of settlement coalescence. The green wedge to the north of Glenfield is essential to maintain separate communities; to provide a green lung; to provide access to recreational space; and to maintain the Rothley Brook Wildlife Corridor.

Proposing development at Glenfield will not have a positive affect on access to the countryside.

Development at Syston is likely to affect the heritage assets at Barkby including Barkby Conservation Area and a number of listed buildings within the settlements.

Syston suffers from poor air quality. Monitoring takes place on Melton Road where even more traffic could exacerbate the problem. The majority of Syston is in a floodplain and there are concerns over flooding from Rothley Brook.

**Social Issues**

This option will cause too much strain on infrastructure, such as the health centre, local police station and primary schools in Glenfield. The need for a cemetery at Syston is an example of where infrastructure has not kept pace with need.

**Transport**

This option will only exacerbate traffic congestion on the A46 because of the major housing development to the south of the A46 at Ashton Green. Public transport will need to be vastly improved to cope with demand from new developments.

The 2012 Traffic Assessment does not consider the localised pressure points caused by 6000 houses in one location and it will simply not be possible to achieve 100% mitigation.

Parking in Syston Town Centre is already a major problem and it is not possible to find land near the town centre for additional parking.
**Economic Issues**

It is not clear where new residents would work. The nearby New Parks area already has high unemployment levels. Employment in Syston is restricted and decreasing.

**General Strategic Issues**

The coalescence of Syston and Leicester City may lead to administrative boundaries changing. This could result in a huge loss of revenue for Charnwood Borough Council.

This Option is not in conformity with the Regional Plan.

**The following alternative options were suggested by respondents that commented on this option:**

There should be no further development beyond the urban area until all brownfield sites within them have been fully utilised. Empty and derelict homes should be utilised first before considering building new homes.
Option 4: South and East of Syston

52 Respondents

The majority of respondents did not support this option for an additional direction for growth. The key concerns raised related to the loss of open countryside and the effect upon an established green wedge. There was also concern about the coalescence of Syston and Thurmaston and an increase in traffic on a road network that is already heavily congested.

The following comments were made by respondents that did support the option as an additional direction for growth:

**Environmental Issues**

Growth at Syston would not affect smaller villages which should be allowed to expand within the overall concept of this option but with some green separation between each of them.

**Economic Issues**

Thurmaston is in need of regeneration and could be revitalised by growth proposals.

**General Strategic Issues**

This area is appropriate for development as it is already semi-urban and has good connections to Syston, Thurmaston and Leicester. Syston has the infrastructure to cope with additional growth.

The following issues were raised by respondents that did not support the option for an additional direction for growth:

**Environmental Issues**

Development at this location would lead to the eventual coalescence of Syston, Barkby, Queniborough and Thurmaston, severely affecting settlement identity and character.

Thurmaston is already liable to flooding and additional development will only make the problem worse.

Development which involves building on the green wedge and areas of separation should be avoided. Development here would result in the loss of high value good quality agricultural land. The environmental impact will be extensive with a huge loss of local habitats and wildlife and vulnerable species will be lost forever.

**Social Issues**

This option will cause too much strain on infrastructure, such as the schools, dentist and medical centres in Syston. The need for a cemetery at Syston is an example of where infrastructure has not kept pace with need.
Economic Issues

Industrial uses should be relocated on land to the north of the A46 so that unused industrial land within Thurmaston can be reallocated for housing.

Transport

Traffic routes between the City and Syston are already congested at busy periods and the 2012 Traffic Assessment does not consider the localised pressure points caused by 6000 houses in one location and it will simply not be possible to achieve 100% mitigation.

Public transport will need to be vastly improved to cope with the demand from new developments and reduce the need to travel by car. In addition, pollution from increased traffic will have an effect upon local air quality.

General Strategic Issues

Whilst this option is for just 1500 dwellings it would actually form a total Sustainable Urban Extension of 6000 dwellings because of those proposed at Syston. Development would still require an additional 643 units to be identified elsewhere and there are concerns about where this additional housing would actually go. Instead of such a large amount of growth being directed to Syston, Glenfield should also be included in this option.

The coalescence of Syston and Leicester City may lead to administrative boundaries changing. This could result in a huge loss of revenue for Charnwood Borough Council. Also, this Option is not in strict conformity with the Regional Plan.

The following alternative options were suggested by respondents that commented on this option:

Brownfield sites should be exhausted before using green sites. Derelict housing within Syston should be used first before new homes are built.
Option 5 Not Meeting the Housing Requirement

26 Respondents

The key issues raised related to the appropriateness of the urban concentration policy and whether Charnwood should continue to provide for the levels of housing growth within the Leicester Principal Urban Area.

The respondents that did not support the option raised the following issues:

**Environmental Issues**

The quantity of housing proposed in the plan cannot be accommodated in the borough without damage to the environment, local amenity and subsuming villages.

Housing development is severely constrained by the Charnwood Forest area and the Soar Valley floodplain. Many of the site options, especially down the Soar Valley, will lead to linear urban growth and further erosion of the identity of village rural centres. The overall level of growth will breach the environmental capacity of the area to accommodate this.

There should be no further housing development at all until the change in building regulations requiring housing to be zero carbon. There should be no further development beyond the major urban areas until brownfield sites have been fully utilised.

**Economic Issues**

Development in rural areas would have a detrimental affect on the attractiveness of parts of the borough possibly reducing visitor numbers and therefore tourism revenue.

**General Strategic Issues**

The evidence is based on out of date data and trends and that the housing requirement reflects the unsustainable assumptions that growth can continue and is inherently desirable.

The 'urban concentration' policy requiring 42% of housing to be in PUA should be reviewed, and the burden should be shared by all authorities bordering Leicester, not just Charnwood and Blaby. If this option is selected it would need to be carefully managed and undertaken in conjunction with neighbouring authorities as part of the ‘duty to cooperate.’

Development should be concentrated on the service centres and spread across the Borough.

The Core Strategy would be at risk of being found unsound as it would not fit the objectives to deliver sustainable development in the NPPF as indicated by the Council's own Sustainability Appraisal work.

This option would not be in conformity with the regional plan

A number of respondents suggested alternative approaches to where development should be located:

The Council should first consider whether this housing requirement can be met elsewhere in the District (for example at the Loughborough/Shepshed sub regional centre and in the
Soar Valley corridor where good transport links to the Principal Urban Area are available) before choosing Option 5.

Wymeswold airfield was mentioned as a possible location for development.
Option A: South of Loughborough

42 Respondents

Comments were split between those supporting and those objecting to the option. Those who supported the option emphasised that the location was less environmentally damaging and had good accessibility making it a sustainable and deliverable option. It would also present the opportunity to create a high quality development at an important gateway to the town.

The main concerns of those that did not support the option related to the impact on agricultural land, landscape, biodiversity, transport, access to services and settlement identity.

The following comments were made by respondents that did support this option as an additional direction for growth:

Environmental Issues

Compared to the other options, there would not be as much landscape impact in this area and it could be mitigated by creative planting. There will still be a green area between Loughborough and its neighbouring villages.

There are no major constraints in terms of archaeology, agricultural land quality, noise and air quality and development will not have a significant impact on biodiversity.

The area south of Loughborough is not in a flood zone and there are no drainage concerns. Development would not affect the separate identity or character of Woodthorpe.

Social Issues

A development south of Loughborough provides opportunities to provide new, high quality facilities to serve surrounding communities. The developers of South Loughborough would work with local communities to deliver high quality development and new residents would have access to services and facilities within Loughborough.

Transport Issues

This Option has good connections by a variety of transport modes and good access to Loughborough Town Centre, the A46, M1, Leicester as well as employment opportunities and services. It is within walking and cycling distance of the town centre. Development at this location has the potential to provide a bus service which is currently lacking in the Grange Park development being developed adjacent to Option A. The transport infrastructure in this area can cope better than other areas.

Development could take place if transport infrastructure in this area is improved. Suggested road schemes include a full outer eastern distributor road or a western distributor road.

The work that Leicestershire County Council has undertaken to date does not rule out this option although detailed discussions will be required about what is needed to be done to make development acceptable.
**General Strategic Issues**

Option A is the most sustainable and deliverable of the additional alternative locations for growth.

Projected housing delivery is robust as South Loughborough is an attractive location and is clearly distinguishable from West Loughborough in housing market terms. Development of Option A is needed in the short term in order to address current housing land shortfalls, to relieve impact on villages and to maintain the urban concentration strategy.

Infrastructure in South Loughborough is already in place which would enable an early start to development. Development of Option A allows infrastructure to be seamlessly extended as development grows, which is efficient and economical.

The following issues were raised by respondents that did not support this option for an additional direction for growth:

**Environmental Issues**

The area south of Loughborough is a vital area of attractive countryside which helps define the character of the town. Development in this location would seriously erode the separation between Loughborough and Quorn and would create coalescence. It is important to retain the Green Wedge to the south east of Loughborough.

Development should not encroach on land between Loughborough and Beamanor Hall. This area should be a green corridor between Loughborough and Bradgate Park and there needs to be a buffer between Loughborough and the Charnwood Forest.

Development will result in the loss of valuable agricultural land and wildlife habitats. Development in this location will also impact on a number of listed buildings and could affect the settings of a number of conservation areas and scheduled ancient monuments.

**Social Issues**

There would be little scope to develop additional shopping or other facilities locally.

**Transport Issues**

Congestion is a problem in South Loughborough.

The following alternative options were suggested by respondents that commented on this option:

Brownfield sites within Loughborough need to be fully utilised. Wymeswold Airfield should be considered for development.

Extra housing should be part of one of the original Sustainable Urban Extensions rather than a mini-SUE.
Option B South West of Loughborough

199 Respondents

The majority of the respondents did not support the option for an additional direction for growth to the south west of Loughborough. The key concerns related to the impact on the green buffer of land between Loughborough and Charnwood Forest, particularly the Outwoods which is valued for its recreational use, visual amenity and biodiversity. Other issues raised include the loss of agricultural land, the effect on traffic congestion and the possibility of higher levels of flood risk.

The following comments were made by respondents that did support this option as an additional direction for growth:

General Strategic Issues

Growth is needed in and around Loughborough to accommodate the need for additional housing. The option represents the most appropriate opportunity for sustainable urban extensions within North Charnwood as a result of its low agricultural value, impact on the historic and cultural environment and accessibility to services. The land is owned by a developer with the intention to develop and infrastructure could be provided in a coordinated manner.

The following issues were raised by respondents that did not support this option for an additional direction for growth:

Environmental Issues

This option was felt to contradict the strategy which seeks to conserve, protect and enhance those features of the natural, historic and built environment which are particularly valued by the community. Also, the need to protect the best and most versatile agricultural land was raised as a concern.

The area is designated as particularly attractive countryside and should be part of the proposed Charnwood Forest Regional Park as it is an attractive but as yet undesignated landscape. The Outwoods was also identified as the most popular single green space in Leicestershire in the County Council’s Green Spaces Consultation Report (December 2011).

The high scenic quality of the land means that the area should be afforded protection from development. The land was bequeathed to the public by the Nancy Cope Trust and it should be kept as open countryside for the enjoyment of the population of Loughborough.

The area is rich in biodiversity and supports protected species and a rich variety of bird life, small mammals and an abundance of insect life.

The proposed development would significantly impact upon the setting of several Grade II listed buildings and the setting of Woodhouse, including a conservation area and a number of listed buildings at Beacon Hill, could also be affected.

The risk of flooding would increase substantially. There is already a problem with surface water running down off Beacon Hill. Development could contribute to flooding in areas such as the bottom of Forest Road, Epinal Way and Bramcote Road. Some respondents
questioned whether an assessment had been undertaken to assess the full effect of surface water in this valley.

Building on Outwoods will eventually cause the villages of Woodhouse and Woodhouse Eaves to lose their identity, much in the same manner that the hamlet of Woodthorpe has just about been absorbed by the current new developments.

**Social Issues**

Delivery of housing stock in this area of the quantity described would require additional primary school provision as existing schools are at capacity. The existing health facilities may also find it difficult to cope with additional demands.

The land between Loughborough and the Outwoods is an important recreational asset for the local population. It is busy with walkers, runners and families out getting exercise at weekends and during the week.

**Transport**

The transport infrastructure would not be able to cope with the additional traffic that would be generated by this development and existing problems will be exacerbated as roads are almost at capacity. It would also add more congestion to Epinal Way and the Shelthorpe Roundabout.

Development at this location is too far from Loughborough Train Station and is, therefore, not a sustainable option.

A number of respondents suggested alternative approaches to where development should be located:

The most frequent alternative suggested was to develop brownfield and infill sites within the existing urban area of Loughborough. Some respondents also commented that there were many unoccupied houses and flats in Loughborough.

Reference was made to locations on the east and north east of Loughborough where transport links were considered to be better. Wymeswold Airfield was mentioned as an alternative preferred location by a number of respondents. Alternative sites for development included open land between Junction 23 of the M1 and Hathern.

Support was also offered for growth to the east of Loughborough on the basis that this is an area in need of regeneration. It was also suggested that the proposed sustainable urban extension west of Loughborough could be increased in size to accommodate more development and improve its viability.
Option C: East of Loughborough

63 Respondents

The majority of the comments were not in support of the option for an additional direction for growth to the east of Loughborough. The key concerns raised related to transport, flooding and the fact that the area is separated from the urban area of Loughborough and therefore represents development in the countryside.

The following comments were made by respondents that did support the option as an additional direction for growth:

Environmental Issues

It is of lesser landscape quality than other options. The Landscape Sensitivity and Capacity Appraisal identifies land around Cotes as having a medium-high capacity to accommodate development.

There is potential to create a Country Park which maximises the attractive features of the river valley and could incorporate flood management. It would also provide a fantastic opportunity to establish a Water Country Park (with a new causeway road).

Social Issues

Growth in this location will open up much needed opportunities for the Wold’s villages and allow them to grow. The development will provide affordable homes and jobs. The Wolds are in need of new facilities that a development like this will provide.

Economic Issues

Growth to the east of Loughborough would help to support the shopping and industrial zones in Loughborough. The land at Cotes could also incorporate new job opportunities as part of a sustainable development.

Transport Issues

There is good access to Loughborough Railway Station. The A46 has already been improved. Development here will reduce the need of people commuting across Loughborough and support new road improvements.

Public transport accessibility could be further enhanced by improvements to the Red9 Bus Service. There is also scope to develop a park and ride facility.

This seems a viable option but clearly the roads into or better still, around Loughborough need improvement. A bypass is clearly required with any large volume increase to Loughborough. A full outer eastern distributor road would clearly do this option as per LCC road assessment. There is also excellent potential to increase rail use and add a park and ride.
General Strategic Issues

The development could be designed to mimic the organic development by which a sustainable and attractive settlement naturally develops and the settlement would have a clear identity and a historical reference.

This option is the most sustainable option for development both in the immediate plan period and for the longer term. It would provide the opportunity to deliver a high quality sustainable development to meet housing requirements to 2028.

While growth to the east of Loughborough would be located across the river valley, there are strong functional relationships with the town.

The following issues were raised by respondents that did not support the option for an additional direction for growth:

Environmental Issues

Development at this location may have an adverse impact upon the historic environment for example the Scheduled Monument of Cotes Mediaeval Village and the Grade II Listed Cotes Mill. The setting of the Prestwold estate also needs to be considered. There will also be a loss of rare flora and fauna in the Meadows SSSI which would be put at risk by development and associated flood risk.

There is a high risk of flooding in this location and the mitigation required for flood risk will be extensive, expensive and likely to impact adversely on the character of the landscape. The identity of Cotes would be lost as the proposed development would envelop Cotes on three sides.

Development at this location would reduce access to the countryside and limit access to the rights of way network. Farmland and Greenfield sites should be considered as a last resort.

Social Issues

There are no schools or health facilities in the immediate vicinity. Capacity at nearby schools is an issue as is the availability of health facilities.

Transport Issues

Development here will have a negative impact on Cotes. Roads are already heavily congested especially at rush hour (particularly near Cotes Mill and on the A60) and there is very limited public transport, particularly along Loughborough Road and any future provision is at the discretion of operators and cannot be guaranteed and is unlikely to serve all employment destinations. Increased traffic will also impact on Barrow on Soar.

The recent improvements to the A60 entry into Loughborough and the new link road adjacent to the railway station have been very successful in improving traffic flow and a new community on the scale proposed would undermine these improvements.

The proposed mitigation set out in the Transport Evidence document is flawed as the proposed new road linking to the to the A6 crosses the floodplain and the cost is likely to
be prohibitive. The houses at the junction of the A60 and Stanford Lane are very close to the road restricting visibility and improvements. The impact of new employment land generating HGV traffic and the impact on the Wolds villages have not been considered.

It is highly unlikely that a developer would have the funds to implement the mitigation measures necessary.

**General Strategic Issues**

Cotes should not be viewed as a Sustainable Urban Extension since it would be significantly detached from the urban edge of Loughborough and cannot therefore be considered as an urban extension. This is in conflict with the RSS policy of urban concentration. It would be insufficient in scale to justify provision of essential infrastructure and services.
Option D: Adjoining Shepshed

58 Respondents

The majority of respondents were not in support of the option as an additional direction for growth. The key concerns raised related to Shepshed not having the facilities or infrastructure to cope with additional growth.

The following comments were made by respondents that did support the option as an additional direction for growth:

Social Issues

Shepshed has the infrastructure to cope with expansion and further development could also strengthen it. There would need to be lots of small local shops rather than a big supermarket.

Transport Issues

Development at East Shepshed will provide less pressure on the local road network as there is good access to the M1 and A6. Better access to the local road network will mean less traffic travelling/cutting through Loughborough.

This is potentially a good location for development. However, careful consideration will need to be given to managing the increased traffic on the A512 and M1 which are already congested.

General Strategic Issues

This option will support the strategy of urban concentration and regeneration. The evidence base shows that the West of Shepshed is a suitable and sustainable location for development and additional growth.

The site at Oakley Road is the only viable option from the SHLAA sites. This site is a logical location for development that will assist in creating a small expansion to Shepshed at the right size and scale.

The following issues were raised by respondents that did not support the option for an additional direction for growth:

Environmental Issues

Shepshed will merge with other surrounding villages and lose its own identity. Likewise Hathern is in danger of losing its identity and should be protected from further major development. Land south of the Urban sprawl towards the motorway would destroy Loughborough’s image and particularly that of the University.

The A512 has always been seen as part of Charnwood Forest and should be preserved. The Scouthouse Hill area is considered by the Leicestershire and Rutland Wildlife Trust to be an important part of the Charnwood Forest Living Landscape Project which aims to reconnect fragmented wildlife sites.
West of Shepshed has high value, good quality agricultural land and is of scenic quality and therefore should not be developed. Development could affect the setting of Garendon Park and the Shepshed Conservation Area.

There are a number of badger sets and historical buildings which would be lost if development happened here. There will be loss of open countryside and access to it. Therefore, brownfield land should always be built on first in order to save and protect valuable countryside and agricultural land.

Black Brook flows in to this area and potentially could create issues elsewhere as this watercourse in places has raised flood defences.

**Social Issues**

There is a lack of local services in Shepshed and most residents have to travel outside of the town for employment, shopping and leisure activities. Development to the west of Tickow Lane would further exacerbate this. Shepshed has been allowed to expand over the years with little thought to providing an adequate town centre to support this.

**Economic Issues**

There are not enough employment opportunities in this location to cope with additional growth in this area.

**Transport**

Development to the east of Shepshed is not viable due to close proximity of the Motorway and the proposed Newhurst Quarry development which would impact on the quality of life in this location. No one should be subjected to noise, air pollution and accidents 24 hours a day, 365 days a year by siting housing and industries next to the M1.

Development here will not bring with it any infrastructure improvements as the development will be considered as ‘in close proximity to Loughborough’ with easy and convenient access already available.

Shepshed has already felt the massive impact of housing and commercial developments including increased traffic (e.g. Charnwood and Leicester Roads), pollution and noise, lack of car parking provision and congestion at peak travel times.

This location is not convenient for public transport. Bus services have already been reduced which means this location would not support and encourage sustainable modes of travel.

**General Strategic Issues**

These proposals fail several of the core planning principles of the National Planning Policy Framework. The sequential test should be applied equally to all development options to identify the best sites for development. This option would not pass that test.

**The following alternative options were suggested by respondents that commented on this option:**

Wymeswold Airfield would be a more suitable location for development.
Other brownfield, vacant and derelict properties in Shepshed and Loughborough should be bought back in to use before building new ones.
Option E: Concentrate Additional Development in Loughborough and Shepshed

59 Respondents

The majority of respondents did not support this option. Key concerns raised include the lack of certainty about the infrastructure that might be forthcoming and cumulative environmental impacts. Other key points included specific environmental concerns, particularly settlement identity and loss of countryside, concerns over transport infrastructure and the level of existing services.

A minority of respondents supported this option with the key reason being that it is more likely to deliver the housing required than other options.

The following comments were made by respondents that did support the option as an additional direction for growth:

**Environmental Issues**

Shepshed is a desirable place to live, located next to the National Forest. West and east of Shepshed would appear the best locations for development, with some justification for development to the south of the town.

**Social Issues**

This option will strengthen weak high streets and make more vibrant urban culture.

**Transport**

Areas to the east of Shepshed and west of Loughborough provide better access for major road routes in an area already very developed.

The following issues were raised by respondents that did not support the option for an additional direction for growth:

**Environmental Issues**

Shepshed, Hathern and Loughborough must all retain their separate identity. Development in this location will affect urban separation and local identity.

The development will be in an area of historical importance and will affect the unique local status of Garendon Park and its setting.

The area of land between Loughborough, Hathern and Shepshed is liable to flooding. There is a need to retain prime agricultural land as a source of local income for local farmers, to grow food and for indigenous wildlife.

If development happens here, future residents will be subjected to unacceptable noise and air pollution from being located close to the M1 motorway.

The Green Wedge to the West of Loughborough includes a national cycle route which is also suitable for people with disability scooters. It also includes one of only two bridleways
on the edge of Shepshed. This option will reduce the ability to access countryside for those in Shepshed.

**Social Issues**

Shepshed lacks local amenities, facilities and infrastructure. The proposal will increase commuting along the M1, and lead to Loughborough becoming a dormitory town and losing its proud market town heritage.

This options assumes an increased delivery from urban capacity sites and will do little to change the perception of Loughborough to house purchasers, which will be necessary to achieve required rates of delivery.

**Economic Issues**

Shepshed has seen significant development in recent years at the same time as employment opportunities in the immediate area seem to have diminished. This option will lead to uncertainty, and will not provide direction to developers and the planning of infrastructure.

There is a need for agricultural land to grow food locally to support local businesses and shops.

**Transport**

Existing transport infrastructure is inadequate to deal with increases in traffic. The unsound traffic model means that more housing here would cause transport chaos.

There are also issues with road safety particularly near the primary schools that are near to the proposed SUE.

**General Strategic Issues**

The proposed urban extension has delivery issues. The Council should continue with the strategy of urban concentration and should accommodate development on smaller sites in order to meet projected housing shortfalls.

The following alternative options were suggested by respondents that commented on this option:

Wymeswold Airfield and opportunities for development in Loughborough provided brownfield sites are used up.
Option F: Spread Additional Development Across the Borough

43 Respondents

Comments were split between those objecting and those supporting the option. Many comments were focussed on the impact on Service Centres. Key issues raised with this option relate to the impact of new development on communities and existing infrastructure, as well as other environmental impacts.

The following comments were made by respondents that did support the option as an additional direction for growth:

Environmental Issues

The character of the Borough will be retained if the developments are planned sensitively. This option will have less overall impact than the alternatives as it does not cause settlement coalescence. This option will cause less concentration of traffic and will have minimum impact on public transport and other services.

Social Issues

There should be policies to support the extension of all villages outside the Principal Urban Area, with an emphasis on small light industrial units and affordable housing. This approach would enable villages to retain young people and families.

Development across the Borough would also help to integrate newcomers.

Economic Issues

The development of suitable employment sites in Service Centres is encouraged and is advocated through NPPF.

Transport

There are infrastructure concerns associated with transport around Loughborough Town Centre and M1 Motorway as well as constraints around surface water drainage. These restrictions in infrastructure capacity have implications for meeting housing supply targets for Charnwood Borough. Option F is therefore supported as it relieves growth pressures on Loughborough/ Shepshed and accords with NPPF which states: ‘to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities’

General Strategic Issues

This approach would limit the pressure on existing infrastructure and could be viable as long as a doctor’s surgery, school capacity and transport capacity are considered.

All communities large and small should be taking a share of the housing to address housing crisis. Spreading development across the whole borough has worked successfully for years.
There is concern that the Council are seeking to over-strategise the delivery of every single housing unit, rather than finding pragmatic ways of freeing-up the planning framework to ensure the delivery of housing to address a shortfall. For this reason it could be an acceptable top-level strategic position not to have identified specific development sites/locations.

The following issues were raised by respondents that did not support the option for an additional direction for growth:

**Environmental Issues**

There will be cumulative environmental impacts from development under this option and the Sustainable Urban Extensions also planned. It is not appropriate to distribute 1,313 homes without identifying a direction for growth, given the significant environmental constraints.

Housing estates of 1500 to 4500 properties have problems where the houses have small rooms and garden with insufficient room for roads.

**Social Issues**

This Option is only likely to have a minor positive effect on the delivery of housing.

**Transport**

The unsound transport model means that additional housing will lead to transport chaos.

**General Strategic Issues**

This option is contrary to the urban concentration strategy and the Service Centres are less sustainable than urban edge locations

This Option places too much emphasis on Service Centres which have already been allocated development in recent years.

Development is unlikely to provide sufficient developer contributions to mitigate the impact on service centres. This would lead to highly unsatisfactory outcomes and uncertainty over where development would be located.

A Core Strategy should provide greater certainty for developers and for the planning of infrastructure and should specify a direction for growth. There is no point in a strategic plan which leaves the location of development to a later planning document, where there may be reduced public involvement.

The borough has extensive areas of brownfield and redundant industrial and commercial space; these should be fully exploited via change of use and imaginative schemes (as exemplified by the development near Loughborough station)

The following alternative options were suggested by respondents that commented on this option:
There should be scope to increase density of development within the existing boundary of Loughborough through more apartments for families. Empty homes and business should be used first - infill across the borough should be the answer.

Wymeswold Airfield
Option G: Concentrate Additional Development in Service Centres

34 Respondents

The majority of respondents did not support this option. The key concerns raised relate to settlement identity and the capacity of services and facilities within Service Centres. Other comments relate to a lack of certainty and concerns over the environmental capacity in relation to the proposed scale of growth.

The following comments were made by respondents that did support the option as an additional direction for growth:

**Environmental Issues**

Spreading development across a number of Service Centres may have positive impacts upon the historic environment compared to larger scale extensions.

**Social Issues**

Development in the Service Centre meets the needs of rural communities and assists in the viability of settlements.

**Economic Issues**

Large extensions to urban areas can lead to socio-economic problems, whereas developments within existing communities can be better assimilated.

The development of suitable employment sites in Service Centres is encouraged and is advocated through NPPF.

**Transport**

There are infrastructure concerns associated with transport around Loughborough Town Centre and M1 Motorway as well as constraints around surface water drainage. These restrictions in infrastructure capacity have implications for meeting housing supply targets for Charnwood Borough. Option G is supported as it could relieve growth pressures on Loughborough/Shepshed and accords with NPPF which states: "to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities".

**General Strategic Issues**

Development in Service Centres helps to deliver a wide choice of housing (rather than being focussed in Sustainable Urban Extensions), which is an approach advocated by NPPF. Development in Service Centres will help to assure delivery of the housing target and is sustainable as evidenced by Service Centre Capacity Assessment 2011.

This option will dilute the impact of the additional houses but this depends upon the location of new developments relative to the Sustainable Urban Extensions.

The following issues were raised by respondents that did not support the option for an additional direction for growth:
**Environmental Issues**

The Soar Valley is already a congested ribbon community, and further growth at the Service Centres will impact on their unique character and could lead to coalescence. The Service Centres should retain their individual identity.

Major expansion of the Service Centres could lead to expansion up the hillsides which are valued for their landscape and environmental character. This level of growth exceeds the environmental capacity of the area and is harmful to it.

There will be cumulative environmental impacts from development under this option and the Sustainable Urban Extensions also planned.

**Social Issues**

Significant further development within Service Centres is less favoured by those communities.

**Economic Issues**

Building in Shepshed and Loughborough will place an increased strain on emergency services which have been subject to cuts.

**Transport**

The Service Centres are concentrated in the Soar Valley which experiences frequent disruptive flooding. This severely compromises road access.

**General Strategic**

It is not clear whether new residents will be matched by comparable numbers of jobs available locally.

Service Centres are struggling to cope with extra residents with schools, healthcare social facilities and transport networks already stretched. The numbers involved in each centre would not see the improvement in facilities.

A Core Strategy should provide greater certainty for developers, for the planning of infrastructure, and for the potential communities that may be affected by development.

There are limited options for development available within Service Centres. This means development is unviable without significant investment.

This option is contrary to the urban concentration strategy.

**The following alternative options were suggested by respondents that commented on this option:**

Wymeswold Airfield is a suitable location for additional growth.

New Service Centres should be built in the east of the borough.
**Option 1: Overall Housing Figure for the Service Centres**

25 Respondents

*The majority of the respondents did not support the option but there were also a significant number of supportive comments. The key issue centred on the degree of flexibility which should be provided in the plan and whether a greater level of detail on housing provision for each service centre would be beneficial for communities, developers and effective planning.*

The respondents that *did support* the option raised the following issues:

**General Strategic Issues**

The Core Strategy is a strategic document and until such time as detailed individual site assessments have been undertaken it is considered premature to define precise housing figures for the service centres. Specifying the number of dwellings to be provided in individual service centres would be unnecessarily constraining. It would also reduce the impact on any single location with each application for development considered on its merits.

It would provide most flexibility for the Council to consider the appropriate scale of development for individual service centres as part of an Allocations DPD. It would also provide the flexibility to allow for the release of sites to address shortfalls in the 5 year housing supply.

The following issues were raised by the respondents who *did not support* the option:

**Social Issues**

Overall housing figures were too high already and the services will not be able to cope with additional development. Placing additional pressure on local service centres to deliver a larger proportion of the perceived housing need is not acceptable as these have already been disproportionately developed in the recent past and this risks further damaging their essence and the reason that they are popular locations. Any of the higher figures envisaged would need to be supported by service provision and leisure facilities.

**General Strategic Issues**

This option would result in development taking place in an unplanned way. It would provide flexibility but the more popular villages, specifically Barrow upon Soar, would be subject to speculative applications.

A number of the respondents suggested alternative approaches, notably a major development of brownfield land at Wymeswold.
**Option 2: Relative Assessment of Service Centres**

16 Respondents

*There was some support for this option but a significant number of respondents raised concerns. The key issues related to whether the evidence base was in place to determine the spread of housing amongst the service centres and whether an allocation would prove to be too constraining.*

The respondents that *did support* the option raised the following issues:

**General Strategic Issues**

This option would dilute the impact of additional housing but would also give the opportunity to manage the allocations.

The respondents that *did not support* the option for an additional direction for growth raised the following issues:

**Environmental Issues**

The service centres would not be able to cope with this scale of development. All of the service centres have already been overdeveloped, and will lose their rural character if any more significant development on greenfield land takes place.

**General Strategic Issues**

The Service Centre Capacity Assessment, 2011 does not provide sufficient evidence of constraints on capacity to justify ranking the service centres or the selection of specific housing figures for individual centres.

Without a sensible strategy in place, this option will allow developers to put development wherever they like.

This option ignores the contribution that development at Wymeswold could bring.
Option 3: Housing Figure for each Service Centre

23 Respondents

The key issue was whether the provision of housing figures for each service centre would enable effective planning. On balance the respondents were supportive of a housing provision figure for each service centre, particularly as it would help to encourage neighbourhood planning while a smaller number of respondents objected to this approach, some of whom expressed the view that the scale of development was likely to be excessive.

The following issues were raised by respondents that did support the option:

General Strategic Issues

Providing housing provision figures for each service centre would provide certainty for all parties and be beneficial to effective planning, particularly neighbourhood planning as well as the provision of infrastructure. It was felt that the Council would have the evidence in place such as the Charnwood Service Centre Capacity Assessment 2011 to identify a specific housing target for each of the Service Centres and should do so.

Anstey and Syston should be considered separately from the other Charnwood Service Centres as they are functionally part of the Leicester Principal Urban Area. Service Centre growth should therefore be distributed between Barrow upon Soar, Mountsorrel, Qourn, Rothley and Sileby.

Any building in future at service centres should be limited to brownfield sites only so as to avoid coalescence between settlements.

The following issues were raised by respondents that did not support the option:

The Service Centre Capacity Assessment does not provide sufficient evidence of constraints on capacity to justify a separate housing figure and specifying the number of dwellings to be provided in individual Service Centres at this stage would be unnecessarily constraining.

Until such time as detailed individual site assessments have been undertaken it is considered premature to define precise housing figures for the Service Centres.

One respondent commented that this option ignored the contribution that a major development at brownfield Wymeswold could bring.
Other Comments

155 Respondents

A range of other comments were made, many of which are not directly related to the development options set out in the supplementary consultation.

These included comments on:

- The proposed Sustainable Urban Extensions at North East Leicester and West Loughborough;
- Basis of the housing requirements;
- Environmental Issues;
- Transport and Infrastructure requirements;
- Urban Capacity and Brownfield Sites;
- Social Issues
- Economic Issues
- General Strategic Issues
- Wymeswold Airfield
- Consultation Arrangements

Proposed North East of Leicester Sustainable Urban Extension

The following issues were raised by respondents:

Environmental Issues

Development in this area would result in a loss of countryside (including public footpaths and bridleways) and wildlife habitats such as hedgerows and ditches which support many different species of birds and animals and will increase air quality issues and carbon emissions in the area.

Development of this scale would have an impact on the identities of Thurmaston, Syston, Queniborough, East Goscote, Barkby and Barkby Thorpe as separate villages to Leicester. Compared to many sites around the City boundary, this area is extremely rural and the farmland setting of Barkby and Barkby Thorpe is a key part of their identity.

Development will result in the loss of productive agricultural land and increase flood risk.

Social Issues

Thurmaston is already suffering from being separated by the bypass and affected by the Asda and related shopping centre. Large scale development further threatens the settlement. This proposal will be tacked onto Thurmaston impacting on the local doctors, dentists, schools, community facilities and local services. A large number of potential
houses in this location may mean there is a need to expand or close the Barkby village school.

**Economic Issues**

Development here will prevent tenant farmers from continuing their family tradition of farming this land and destroy livelihoods.

Development of this scale could result in the requirement of more supermarkets or even shopping centres, threatening local enterprises.

**Transport Issues**

Development would cause air quality issues and traffic problems as this scale of development cannot be supported by existing roads. Many roads are already congested at certain times for example Troon Way, Hamilton Way, Humberstone Lane, Barkby Thorpe Lane, Highway Road.

The 2012 Traffic Assessment does not consider the localised pressure points caused by 6000 houses in one location. The 2009 Traffic Assessment for South Charnwood demonstrated that even with expensive highway measures only 71% mitigation was achieved. As this option proposes 6000 new homes in the area south and east of Syston, north of Hamilton and east of Thurcaston, it will simply not be possible to achieve 100% mitigation.

**Proposed West of Loughborough Sustainable Urban Extension**

**Environmental Issues**

There is a green wedge between Loughborough and Shepshed preventing the coalescence of the two towns. The green wedge has been identified as one of the most highly prized in a recent consultation by the County Council. This development would impact on the settlement identity of Shepshed and Hathern.

Development would mean the loss of an area used for walking, horse riding, running, cycling and numerous other leisure activities. This area would become an urban sprawl with all the problems that go with.

This area is a historical area of natural beauty, containing prime agriculture land and woodland. Flood risk would also increase if development takes place.

**Social Issues**

Shepshed has already been allowed to expand from a rural village into a dormitory housing estate without an adequate town centre and very poor road infrastructure. Further development is not what is needed. There has been a lack of vision for Shepshed.

**Transport Issues**

The road infrastructure in this location is inadequate for the proposed extra traffic. The A6 and A512 are already congested and the air quality in Loughborough is already at poor levels. Traffic problems will be exacerbated by the lack of a good link between the A512 and Epinal Way and the cumulative effects of the proposed Science Park and Biffa site at Newhurst quarry. The inner relief road will not alleviate this development.
This proposal will exacerbate the imbalance in Loughborough, with the town centre and the railway station located on the eastern side and the majority of housing located on the western side. This already leads to many unnecessarily long journeys, mostly by car. Residents have no opportunity to live close to the town centre and railway.

**General Strategic Issues**

There should be no presumption that an urban extension to the West of Loughborough is the preferred option. It was rejected by the public in 2006 and 2008 and that should be taken into account in light of the Localism Act and the planned abolition of Regional Plans.

The proposed Sustainable Urban Extensions remain the same despite the fact that the evidence base has been completely revised since 2008 and the circumstances have changed.

The need for more housing in this area is questionable as many houses are for sale and some have been on the market for over a year.

**Basis of the Housing Requirements**

A range of comments were made about the current housing requirement. The majority had concerns about the level of housing proposed although there was also support. The following issues were raised:

The housing targets require further clarity and independent scrutiny based on what is proposed by the Regional Plan and the Leicester and Leicestershire Housing Options Report.

The Council should challenge the targets and undertake a study to determine demand. Changing economic circumstances suggests that housing needs will change. Not every individual needs their own dwelling and it might be better to encourage a multi-generational housing solution.

The level of housing required should take account of developments already permitted, empty properties and expected windfall sites.

The focus should be on controlling population growth. Central government should do this by controlling immigration, international marriages, and change fiscal incentives to discourage people from having larger families. This would be cheaper than the investment needed for building new homes.

There is no evidence that Charnwood Borough Council has done a full Housing Needs Assessment including tenure, size and types of homes needed. This assessment is needed to understand where homes should be located (i.e. social housing needs to be close to facilities and public transport whereas larger homes will be occupied by people with cars able to access services further away) and what levels of profitability will be achieved and therefore the contribution developers will be able to make to infrastructure.

It is considered that the approach to the appraisal of options to accommodate the identified housing shortfall is overly mechanistic and as a result has not considered the range of available options to accommodate the required level of housing within and adjoining the Leicester Principal Urban Area. The approach is inflexible in applying a 500 dwelling threshold for the consideration of potential directions for growth. It also does not consider alternative combinations of growth options.
Providing the majority of housing within the Principal Urban Area and the Sustainable Urban Extensions is supported and the opportunity to maximise the overall allocation of housing in these locations should be looked at. The reduction in the Sustainable Urban Extensions has been attributed to densities, build-out rates and initial market testing but these factors would affect development in any part of the Borough.

Housing sites need identifying for affordable housing and policies need to be clear about what level of affordable housing is intended.

Environmental Issues

The main issues relating to the environment were:

Any plans must recognise that Loughborough has natural boundaries that have been reached in many places. If existing green wedges are to be preserved, there is little scope for large scale Greenfield expansion.

There is a need for the Local Plan to secure biodiversity enhancements, protect the interests of the numerous SSSIs, local wildlife sites and BAP habitats within the Borough. This should also incorporate areas of local separation, high quality green infrastructure and increased access to nature. The Local Plan will also need to protect the historic environment, local landscape character and geological assets from growth.

The majority of the sites under consideration have some element of flood risk affecting. Although the majority of sites will be developable, there may be some limitation on the numbers of dwellings that can be constructed, and focus should be on locating development in the appropriate low flood risk zones and using the Sequential Test approach.

Increased amount of waste water and sewage effluent produced by the new developments will need to be collected and treated to ensure that there is no deterioration in the quality of the water courses in the area to meet the Water Framework Directive River Basin Management Plans.

Given the predicted effects of global warming, and increased demand for food and bio-energy crops, building on Grade 2 or better land should be avoided.

Barrow and Sileby both have seen significant development in recent years. Locating more housing onto these two villages risks their character being irreparably changed and with the lack of additional local employment opportunities they will increasingly become dormitory villages serving Loughborough and Leicester putting pressure on the local road network.

Transport and Infrastructure Requirements

The main issues raised in relation to transport and infrastructure were:

Walking and cycling routes, together with bicycle parking, should be included in all new estates to encourage walking and cycling. Loughborough also needs a bus station.

Loughborough suffers from delays and congestion. This will not be eased by the diversion of the A6 round the town centre. There is a need to widen the M1 to at least four lanes from junctions 21 to 25.
The Council should be planning for car ownership as it is unrealistic that alternatives will replace the car. Planning should be taking account of a future where car design will remove the problem of pollution and size of vehicles, rather than focusing on getting people out of their cars.

The planning process has previously proceeded on a piecemeal basis with no evidence of foresight for the future needs of the community. For example, traffic problems on the Epinal Way mean the stretch between Shelthorpe and Ashby Road will have to be duelled but this is not being taken into account through planning decisions.

There are outstanding issues with the transport modelling data obtained from Leicestershire County Council with the Highways Agency is challenging the figures. This raises the question of the validity of this consultation if the data is flawed.

The impact on existing infrastructure should be considered together with new requirements including; doctors surgeries, schools, transport infrastructure, social and community facilities, policing and electricity infrastructure.

The Council should work with Rushcliffe to change the county boundary and build a bridge over the Soar to overcome the problem that Loughborough is situated right on the perimeter of the Borough, bordered by the river Soar and its floodplain. One option would be from the Astra Zeneca site to Stanford Road, providing access to almost unlimited greenfield sites above the floodplain and provide a much-needed additional route across the river.

The Core Strategy should include specific policies to protect or replace existing sports facilities that may be affected. Robust assessments are available and up to date to ensure appropriate investment in new or updated sports facilities, either under CIL Regulations or via S106 agreements.

Housing growth may require the expansion and upgrade to existing sewerage systems and sewage treatment works. If the sewerage network does not have the capacity to accept the flows then development must be phased in with the upgrading of the network.

It is important that additional housing sites are located so as to maximise the benefits brought by infrastructure and facilities associated with the Sustainable Urban Extension and Science and Business Park.

**Urban Capacity & Brownfield Sites**

Brownfield sites within the existing urban areas should be first choice for future housing, particularly affordable housing. This scale of Greenfield development would not be needed if brownfield sites are used. There needs to be an active policy to prioritise brownfield land and make early and better use of derelict land. Infill Greenfield sites should be used as a second priority.

Brownfield sites will usually require less infrastructure (such as roads, gas and water mains and sewers) and residents will have the benefit of short travel distances to town services and facilities.

There are a number of sites in Loughborough and Thurmaston which could be considered for housing including disused factories, the old hospital site, several acres available between the Grange Park and Fairmeadows developments, sites on Great Central Road and Beacon Road.
Shelthorpe Golf Course site could be considered for housing because it is close to shops and services in Shelthorpe and a replacement course could be created on Council owned land to the south of the Nanpantan Sports complex.

**Social Issues**

The following issues were raised:

The sustainability of a settlement should only be based upon evidence of jobs and amenities for that settlement. Local plans need to be distilled down to specific neighbourhoods to reflect local circumstances. For example, in Shepshed there is existing stock unsold.

There are a large number of properties in multiple occupation by numbers of unrelated persons, usually students. I suggest that the Council make a policy to discourage any further increases in the numbers of properties in multiple occupation and positively encourage landlords to let their properties to new households. It is hoped that the rise in student tuition fees will reduce the pressure on housing in the environs of the University and cause landlords to seek other tenants for their properties.

A student village would significantly alleviate accommodation pressures in the town and return areas which are currently dominated by students to original residents and with a greater emphasis on more learning and teaching via electronic means an e-campus would mean less trips to the campus. A student village would not place the same demands on infrastructure and could be accommodated on a brownfield site outside the town.

More should be done to retain and enable new town centre housing and to create more town centre accommodation by converting rooms over shops and offices into flats.

**Economic Issues**

The main economic issues raised were:

With the closure of Astra and no new significant employment opportunities being created other than the warehousing and distribution centres, major housing development will lead to out commuting,

Consideration needs to be given to where new residents will work to avoid becoming a dormitory town serving Leicester, Nottingham, Derby, Birmingham and Coventry.

The Quarry at Mountsorrel, which is a major employer, should be protected from development which encroaches upon it and any expansion of the quarry should be dependent upon returning the landscape into its natural state.

The need to co-locate employment with large scale housing development is supported, but it is questioned whether some of the smaller housing options could be separated from employment development to minimise the residual to be found. The further evidence on the employment land requirements being undertaken can be used to inform the final development of this policy.

There is a need for a large scale building program of council housing as it will create much needed jobs i.e. maintenance tradesmen and women that can be directly employed by the council.
General Strategic Issues

Whilst strategic growth is important, organic growth should be supported by finding ways of freeing-up the planning framework. Spreading development across the whole of Charnwood has worked successfully for years and provided better houses for families than huge estates will. This approach spreads the traffic out across the County. There are areas around villages that would benefit from additional housing.

The urban concentration strategy underpinning the Core Strategy should be changed and new areas should be sought. Having a strategy to concentrate development in urban areas is putting pressure on existing services, leading to settlements merging, creating an ill defined suburban area which is difficult to service by public transport and tends to be wholly reliant of car transport and no longer provides a compact environment where people can walk everywhere and have a strong sense of community. The onion skin approach of building layer upon layer of new housing restricts access to the countryside from the earlier development and increases the pressure on the town.

A number of factors show that the principal of large scale Sustainable Urban Extensions is potentially an outdated concept, other models should be investigated. In the new economic and legislative environment, there is some questions about whether the provision of infrastructure will be delivered with Local Authorities no longer responsible for the building of new schools, Primary Care Trusts being abolished and the reduced road building programme by the Government. Under new legislation the Section 106 has also been revised and the Community Infrastructure Levy introduced which is a further reason why aggregating all development together to maximise local contribution to road traffic and other infrastructure is less relevant. An alternative could be dispersed development which, whilst making less impact on their immediate local environment, could still contribute to overall infrastructure improvements through the Community Infrastructure Levy.

The overall strategy of urban concentration is supported as these are the most sustainable locations to grow the Borough and the strategy is consistent with the Regional Plan, with limited further development be directed to the Service Centres including employment development.

The Consultation should include the larger Sustainable Urban Extension sites, where the majority of homes are directed, as part of a more imaginative rethink and holistic approach in light of the significant changes in the housing numbers needed and the economic and social outlook. To not include them pre-determines the major Public Consultation due later in 2012.

The Core Strategy needs to take into account the planning horizon beyond 2026. Options which may not score highly in the current plan may be very significant when considering a longer time frame.

The Council is late in developing and approving its Core Strategy and this has led to Officers recommending to permit a number of applications for planning permission that otherwise would have been refused. Whilst there is a need to proceed with speed to the approval of a Core Strategy this should not be at the risk of approving a plan that is flawed because of the lack of additional information or evidence.

Support should be given to neighbourhood plans. Close collaboration with neighbourhoods could provide some of the answers.
The planning process has previously proceeded on a piecemeal basis with no evidence of foresight for the future needs of the community. For example, traffic problems on the Epinal Way mean the stretch between Shelthorpe and Ashby Road will have to be duelled but this is not being taken into account through planning decisions.

People aspire to live in rural, rather than urban areas and as the economy recovers this should be taken into account when looking at proposals for new sites in Service Centres.

Too much weight is being put on the starting point being 'yes' and not enough on the need for development to be 'sustainable'. The sustainability of a settlement should only be based upon evidence of jobs and amenities for that settlement. Local plans need to be distilled down to specific neighbourhoods to reflect local circumstances. For example, in Shepshed there is existing stock unsold.

The intention to progress directly to a Pre-submission version of the Core Strategy, without formally consulting on Preferred Options, is an approach that does carry some risks. There will be no formal stage at which consultees will be able to comment on whether the most suitable option has been proposed, only whether the option proposed is 'sound'. In order to mitigate and minimise the risks associated with this approach the Council should maintain open and ongoing discussions with statutory consultees and service providers.

The statement that the Preferred Strategy in the North of the Borough will be influenced by the decision in the south of the Borough is a flawed approach. Housing should be provided within North Charnwood on its merits, and not be regarded as an area for growth residual to South Charnwood.

To meet the objectives of sustainability the Service Centres should be locations where some of the Borough’s development needs should be met not could be met. As drafted, the plan seeks to disregard the Service Centres in most of the options, with just 2 houses per annum for each Service Centre. This is contrary to the NPPF and will decrease affordability in Service Centres.

**Wymeswold Airfield**

The reason given for Wymeswold Airfield not being included as an option is unclear and contrary to national policy as this is a brownfield site and should be prioritised over Greenfield land.

Wymeswold Airfield is a derelict area which would be improved by development. It is used only for temporary activities such as cart racing, which could easily be located elsewhere. This option avoids destroying valuable agricultural land, green space, wildlife habitats and local beauty spots, which would be unacceptable when there is a suitable brownfield alternative.

Wymeswold Airfield is close to Loughborough, benefits from good road links to the A46 with recent improvements and provides a location for development beyond the next 15 years. Development here would help the local economy of the surrounding villages. It would relieve the pressure on Loughborough infrastructure including the roads and services and facilities.

The opportunity should be taken to be forward thinking and progressive in how we meet housing needs by developing a new settlement, even if this is more difficult. New settlements are supported by the National Planning Policy Framework which highlights the
Garden City approach. Development here would avoid the potential “onion skin” pattern of development and its associated disadvantages.

The decision to not support development at Wymeswold airfield seems to be at odds with Option C, which sees the potential of development around Cotes.

Money from extra council tax and the money from the government for housing targets should be used to provide services and facilities. The road improvements to make Wymeswold Airfield work could be provided by the developers.

**Consultation Arrangements**

Residents have not been correctly informed about proposals and the consultation has made it difficult for people to make comments by expecting everyone to have internet access.

Residents that will be directly affected by these proposals have not been contacted or provided with enough information and will not be told about the proposals until after decisions have been taken.

The documents give only a broad brush overview of the situation in Charnwood as seen by the planning officers. The detail required is not presented and is yet to be addressed.

The opportunity to comment on the West of Loughborough and North East of Leicester Options should be given through the survey to reflect that a decision has not been made and to allow all options to be explored.

This consultation is a prelude for a full six week consultation in late August/September but is about the ‘add-ons’ to major proposals being consulted on later. This is not a logical order to consult in.

The effectiveness of the consultation in delivering a meaningful and informed response from the community will be severely curtailed by the complexity of the options and the supporting information, and there is a question over how authoritative a body of evidence is.

The consultation document should have outlined the potential timing of development, defined Sustainability, explained the next steps for the Local Plan and particularly the need for Infrastructure Planning if growth allocations and locations are to be sustainable.

It would have been useful, for the purposes of this consultation, to have indicated each option more clearly on a map, under each option heading.
Addendum A: Sustainability Appraisal - Summary of Responses on Core Strategy Supplementary Consultation 2012

General

The sustainability appraisal report considers each direction for growth in combination with a West Loughborough SUE or a North east of Leicester SUE and does not carry out a separate appraisal for each of the options. This approach makes it difficult to establish how each option performs. A separate appraisal of each individual direction for growth is required to enable members to make an informed decision.

The sustainability appraisal uses confusing terminology and criteria, scoring as ‘positive’ the benefits that small mitigation measures have on the huge damage greenfield development has on the landscape and the environment.

The interim sustainability appraisal is not explicitly supported by evidence base such as the PPG17 Study and the Green Wedge Review. The final sustainability appraisal needs to be thorough.

An overview of the sustainability appraisal scoring for the south Charnwood options indicate a large number of significant and minor negative scores: an objective view of these proposals recommend a search for an alternative, sustainable solution.

The statement about mitigation of potential negative effects is welcomed and should not be forgotten by inconsiderate or rushed design.

The statement about mitigation of potential negative effects is wishful thinking and bears no relation to reality.

Appendix 5 includes a table which sets out the implications of changes in circumstances since 2008 and does not include a discussion to support scoring given.

Options for North Charnwood

Comments on All Options A - G

English Heritage considers that the impacts of the options on the historic environment have been underestimated as part of the SA process.

English Heritage states that further investigation is required into the environmental impacts of this level of growth, as well as for the proposed sustainable urban extensions.

The sustainability appraisal report does not set out the qualitative and quantitative information why Wymeswold Airfield why it did not perform well in sustainability appraisal, and why it was not considered.

The sustainability appraisal fails to distinguish the relative effects of various locations for employment development, including such factors as proximity to major transport corridors, to centres of population to deprived communities.

Comments West Loughborough
English Heritage considers that the impact of the proposed road through Garendon registered park and garden and the impact of the SUE on the setting of the park will have a significant negative effect, which is in contrast to the appraisal which states that this ‘could have’ a significant negative effect. Reference in the sustainability appraisal to mitigation as a way of overcoming negative impacts are unlikely to overcome impacts on the historic environment.

Option A South Loughborough

The sustainability appraisal fails to distinguish between the relative transport implications of the development directions. The availability of existing highway infrastructure in south Loughborough, well used national cycle route, ease of extending bus services are all positive factors.

Option B Southwest Loughborough

Sustainability Appraisal objective 2 (To maintain and enhance townscape and landscape character) makes no mention of the impact of development in the area south west of Loughborough on landscape character and ‘to minimise detrimental visual intrusion of development’.

Sustainability appraisal objective 15 (To increase access to countryside, open space and semi-urban environments) refers to footpaths links to the Outwoods, which are presently in open countryside but would have no value in the future, as they would be lost following development.

The over-riding negative of option B is its effect on the human need to view open space and to be in it, a factor which is not reflected in the sustainability appraisal objectives, but should be.

The role of open spaces and views in attracting high calibre people is an important contributor to economic prosperity should be reflected in the sustainability appraisal objectives.

The negative impacts of all options, including for option B, cannot be adequately mitigated. Paragraph 3.20 implies that impacts can be mitigated.

Option C East of Loughborough

The sustainability appraisal should have assessed issues to do with the viability of local services and facilities given that option C represents a new settlement proposal.

Consultation response disagree with the sustainability appraisal report which states that an east Loughborough option would have significant negative effect on increased flood risk. The area predominantly falls outside an area of flood risk. Consultants are working with the Environment Agency to establish any risk of flooding associated with the A60. A surface water drainage strategy is being prepared for the area east of Loughborough.

Consultation response disagree with the sustainability appraisal that services and facilities in Loughborough would not be accessible to new residents in east Loughborough; a
promotional document clearly demonstrates that east Loughborough will provide a well connected development.

Consultation responses disagree with the sustainability appraisal that in terms of the regeneration opportunities associated with east Loughborough. Reference is made to the new employment land, community and recreational facilities that would be accessible to residents of east Loughborough.

Consultation response disagree with the sustainability appraisal that in terms of the impact on heritage assets, and reference is made by the promoters of working with English Heritage to ensure heritage assets are safeguarded.

The sustainability appraisal does not highlight the benefits of an east Loughborough option in addressing current open spaces deficiencies.

Option F

The sustainability appraisal identifies many impacts for development around Shepshed and Hathern which are unknown or that require further research. Extra work is needed to before a decision can be made on Shepshed/ Hather.

Options for South Charnwood – Leicester Principal Urban Area

Comments on All Options 1-5

English Heritage considers that the impacts of the options on the historic environment have been underestimated as part of the SA process, in particular options 3 and 4 are considered to be in accurate.

Options 1 -4

There is no serious analysis or recognition of the destructive social and psychological effects of proposed developments for the options around south Charnwood.

There is disagreement with the scoring of options 1-4 on social objectives, as further urbanisation would increase crime, social stress, traffic density and drug use.

Option 5 (Not Meet Housing Requirement)

The requirement for development plans to achieve net gains in social, economic and environmental objectives to deliver sustainable development set out in paragraph 152 of the National Planning Policy Framework would not be met by option 5, as indicated by the Council’s own sustainability appraisal.

The scoring of option 5 (non development of green field land) *sic* having a minor negative effect on good quality agricultural land is questioned.

There is disagreement that option 5 (Not meeting Housing Requirement) will have a negative effect on meeting local housing needs.

English Heritage disagree that option 5 would present fewer opportunities to re-use buildings at risk, as this is not reliant upon large scale housing developments. English
Heritage disagrees with sustainability appraisal scoring and considers that option 5 is likely to have a positive effect on the historic environment.

**Service Centres Option 2**

There is less clarity in the sustainability appraisal of the options for Service Centres to come to any firm conclusion.

**Comments received on Sustainability Appraisal Objectives**

**SO1: To maintain and enhance biodiversity, flora and fauna**

The SSSIs on the Charnwood and Wolds sides of Loughborough require the highest levels of protection.

This is a negative for Garendon, but now compounded by the decision to allow a waste incinerator (EfW) at Newhurst.

The qualification that damage should be avoided should be a requirement, rather than a hope.

The effects of development on biodiversity would be overwhelmingly negative, and reference to ‘enhance biodiversity’ would be ineffective and absurd.

Natural England is satisfied that all options have been systematically appraised against appropriate sustainability objectives, that the assessment has been based on sound evidence and the findings of each options appears reasonable.

**SO2: To maintain and enhance townscape and landscape character**

This is recorded as a negative for Garendon because it is a greenfield site. There are no indications of town/landscape enhancements. Zone 15 is medium to high acceptability but Loughborough South is a high zone.

It is likely that the Distributor Road and additional infrastructure will significantly damage Garendon Park.

Development on Garendon is also recorded as damaging the separation of Loughborough and Shepshed; equally between Quorn and the town to the south.

Little weight is given within the appraisal to the Garden City approach

Much consideration is given to hiding built development, but who would want to hide good design?

**SO3: To increase the vibrancy and viability of settlements**

Large developments have the potential to overload or increase the viability of services, depending on their capacity. There is insufficient evidence to judge which applies on each site.
Development on the east is likely to bring greater viability to Wolds village which, for example, lack good bus service or recreational facilities.

With regard to sustainability appraisal objective 3 (to increase the vibrancy and viability of settlements), the term ‘vibrancy’ is vague.

SO4: To conserve and enhance the historic and cultural environment

Management of Garendon and Prestwold Parks needs a lot more detail and assurance

SO5: To protect and improve surface and ground water quality and resources

Severn Trent Water seem to have sanctioned all sites. There will be a negative effect on water quality.

SO6: To improve local air quality

The MVA Traffic Impact Assessment suggests significant congestion at Epinal Way junctions and significant flow restrictions across Garendon Park. These findings do seem to be reflected in the Sustainability Appraisal Report.

SO7 To reduce the Borough’s contribution to and vulnerability to climate change

The MVA Transport Impact Assessment suggests that the residents of Garendon SUE would use the M1 and the rest of the Strategic Road Network to access employment in the large cities, increasing journey lengths and green house gases.

The Cotes and Wymeswold sites would be the best for micro wind and solar energy.

SO8: To reduce vulnerability to flooding

Black brook is a flood hazard with significant defensive infrastructure along the length of the brook through Gorse Covert, Thorpe Acre and Dishley. The SUE to the west of Loughborough appears to cross an area of high flood risk (zones 2 and 3a), whilst Cotes/Wymeswold is on the edge of a large area of high flood risk (zones 2 and 3a) associated with the River Soar.

SO9 to reduce waste, and conserve mineral resources

This is where brownfield sites like Wymeswold score for both re-using materials and for introducing more sustainable waste management.

SO10 To protect soil resources and quality and make efficient use of land and buildings

Due to a part of the [West Loughborough] SUE being located on high quality grade 2 agricultural land, all of the options are anticipated to have a significant negative effect on soil resource.

SO11 To reduce poverty and social exclusion, reduce crime, anti-social behaviour and increase community safety
The commentary on this objective does not really address this issue. The commentary correctly identifies wards where there is deprivation but does not refer to affordable housing, good urban design. Cohesion is not mentioned and nor is urban renewal on the east side of Loughborough.

Leicestershire Constabulary would appreciate background about assumptions made in sustainability appraisal about reduced crime rates as an indirect benefit of employment development in the Leicester Principal Urban Area.

Leicestershire Constabulary consider that mitigation measures should refer to maintaining policing through growth.

SO12 To increase healthy lifestyles

There is no examination of the PPG17 Study [Open Spaces, sport and Recreation Study].

Access to the countryside is as important as opportunities for recreation. This is high in east Loughborough which neighbours Derby Road sports area.

Both Garendon Park and Prestwold Park offer possibilities but these need to be spelt out.

Road safety is not mentioned, and this is a limiting factor in accessing recreation.

SO13 To ensure that the housing stock meets the housing needs of all sections of the community

Until the proportion of affordable housing is known the assessment is incomplete.

SO14 To increase access to a wide range of services and facilities

There is a need for an approach for new development which are themselves large enough to be self-sustaining or attached to existing villages to form areas which are self-sustaining.

The Wolds has the highest deprivation in terms of ‘Barriers to Housing and Services’ and would greatly benefit from development to address that.

SO15 To increase access to the countryside, open space and semi urban environments (eg parks)

The sustainability appraisal report suggests that West Loughborough

Development at Garendon [West Loughborough] would reduce access for the majority of residents to the countryside, as development would be on existing Green Wedge and make the countryside more distant from existing residents.

SO16 To encourage a sustainable economy supported by efficient patterns of movement attractive to investors

The sustainability appraisal report contradicts the findings of the Transport Impact Assessment which states that journey times will be longest from a West Loughborough SUE because it will attract motorway commuters.
SO17 To reduce disparities in economic performance and improve skills and employability

The report simply suggests that the more employment land is available, the better the situation will be, which is neither enlightening nor informative.