



Charnwood Borough Council

**TOWARDS A LOCAL PLAN FOR CHARNWOOD
DISCUSSION PAPER**

STATEMENT OF CONSULTATION

June 2018

TOWARDS A LOCAL PLAN FOR CHARNWOOD STATEMENT OF CONSULTATION

Background

Charnwood Borough Council published a Discussion Paper, 'Towards a Local Plan for Charnwood' and Interim Sustainability Appraisal as part of the preparation of the new Local Plan for Charnwood to 2036.

The Paper was prepared specifically to seek views on the issues and evidence that will influence how new homes and jobs are planned for. It also sought views on the scale of development needed in the Borough, the key issues and opportunities that need to be taken into account and the options for an overall strategy for delivering the growth needed as well as the relationship between development and the environment.

The opportunity was also taken to consult on the Settlement Limits to Development Assessment, Settlement Hierarchy Assessment and the Green Wedges and Areas of Local Separation Assessment.

Consultation Process

Consultation started on 26th April 2018 for six weeks and ended on the 7th June 2018. A notification letter was published on the 26th April to signal the commencement of consultation and invite participation. The letter was sent to the 1,338 organisations and individuals that are on the Local Plan consultation database which includes statutory consultees, Parish Councils, planning agents, members of the public and local groups. Appendix A sets out the bodies consulted.

An email alert was also sent to those that have registered to receive updates and the communication team also publicised the consultation through the website, social media and press release.

Summary of Responses

In total 104 responses were received in response to the consultation. The table below shows that there was a range of respondents including planning agents and developers, members of the public and various organisations and bodies including infrastructure providers, community action groups and schools.

Towards a Local Plan Consultation Response Summary	
Respondents	Number of Responses
Planning Agents and Developers	32
Members of Public	26
Organisations	23
Parish Councils	14
Local Authorities	5
Borough Councillors	4
TOTAL	104

Summary of Responses

Infrastructure

A number of infrastructure providers and statutory organisations responded to the consultation including Clinical Commissioning Groups, Highways England, Leicestershire County Council, Environment Agency, Sport England and Natural England. These bodies commented on how to improve the vision and on the key issues the plan needs to address including infrastructure capacity issues. Responses also highlighted the evidence which will be needed to inform the Local Plan including Strategic Flood Risk Assessment, Transport Assessments and Infrastructure Delivery Plans.

Responses were also received from Syston County Doctors Practice and Woodbrook Vale School highlighting capacity concerns and the impact of the settlement limits on future development of the School to meet increasing demand.

A diverse range of responses referred to the importance of adequate infrastructure provision to service development and mitigate its impacts. A response was also received from the Education & Skills Funding Agency on planning for school places. The Theatre Trust highlighted the need for adequate protection for the borough's theatres and other arts, community and cultural facilities.

Providing for Development Needs

Many respondents raised concerns about the need and capacity for more housing developments in the Borough. In particular respondents highlighted concerns about traffic and the availability and capacity of community infrastructure as well as the impact on agricultural land, ecology, heritage, air quality, flooding and the character and separation of villages. Concerns were also raised about recent developments and about increasing the housing target to ensure delivery.

Other respondents suggested that the Council should be taking account of the proposed standard housing methodology due to be introduced as part of the new National Planning Policy Framework and that a higher housing figure and variety of sites will be needed to ensure a sufficient supply of housing land. Respondents also highlighted that the unmet need of other authorities in Leicester and Leicestershire will need to be considered.

Joint Working with other Local Authorities and the Strategic Growth Plan

There were questions raised about the relationship between the Local Plan and the Strategic Growth Plan with respondents highlighting concerns about aligning the Local Plan to a non-statutory plan which is not complete and others raising concerns that the discussion paper is silent on the proposal for the proposed A46 extension, a proposal some respondents raised concerns about.

Leicester City Council, Leicestershire County Council, Melton Borough Council, Hinckley and Bosworth Borough Council and Harborough District Council all responded welcoming on-going engagement under the duty to cooperate. Leicester

City Council highlighted the need to work together to consider their unmet need for housing and employment and cross boundary infrastructure. Leicestershire County Council provided detailed comments on transport, education and strategic planning.

Areas of Separation and Green Wedges

Overall there was support for the proposed Areas of Local Separation and Green Wedges and the proposed Settlement Hierarchy, although there were some responses challenging the conclusions. A number of additional Areas of Local Separation were suggested and suggestions made about what should be permitted within these areas. The lack of a national planning policy on landscape designations was also highlighted in response to Green Wedges and Areas of Local Separation.

Settlement Limits and Neighbourhood Plans

There were a number of detailed comments provided on the Settlement Limits to Development. There was also a request to consider the proposed limits in the Quorn Neighbourhood Plan and concerns about proposing limits before identifying future development locations. Responses were also received highlighting the need for the Local Plan to include housing targets for Neighbourhood Planning.

Development Sites

A number of site appraisal and promotional documents were provided for potential development sites. The majority of these were already known to the Council through the Strategic Housing Land Availability Assessment although a small number of additional sites were put forward. Agents and developers took the opportunity to provide additional information about sites and work being undertaken to understand any constraints and opportunities or explore options for future development. There were also a number of site specific objections made.

Student Accommodation

The issue of student accommodation was raised by a number of respondents including concerns about the quantity of Houses in Multiple Occupation and purpose built accommodation and the impact they have on communities. However, there was also support for meeting student needs in a wider area and through purpose built accommodation. Suggestions were also made for further accommodation to be provided on campus. There was also a case made for removing all restrictions on Houses in Multiple Occupation to allow them to meet the needs of non-students.

Environment

Comments were received from the Forestry Commission about the need to consider the impact of development on ancient woodland and the Canal and River Trust about considering the opportunities and impacts on the river and canal network. The National Farmers' Union highlighted the need to consider the rural economy and CPRE suggested higher density housing in urban areas and raised concern about the amount of student accommodation, which could be meeting housing needs.

The Leicestershire Local Access Forum set out support for major schemes with planned infrastructure and highlight opportunities to improve flood affected routes and avoid air quality issues and East Midlands Airport highlight the need to consider the airport safeguarded area.

Development Strategy Options

A preference for one or more of the housing strategies identified in the consultation document was included by some. This included support for urban concentration principles as it maximises existing infrastructure and minimises the need to travel but also concern about focusing development in too few areas or too few sites putting too much pressure on existing infrastructure. There was support for a new settlement approach from a small number of respondents who considered it to take the pressure off existing infrastructure but others raised concern about timescales and uncertainty of new settlements. There was support for more dispersed development to create choice and flexibility from some respondents but also concern about the ability to provide appropriate infrastructure for this pattern of development from others.

Other Issues

In addition to these key themes, there were a range of other issues raised by one or two respondents including comments or concerns about:

-) how the vision will be implemented;
-) how developments will be accessed;
-) how the needs of the elderly will be met;
-) the need to review the approach to rural communities,
-) the need to require a mix of homes including affordable homes;
-) the impact of internet shopping and need for car charging points;
-) challenges to assumptions about infrastructure delivery from small sites;
-) concerns about creating a sense of place in new developments;
-) the need for a vision for the future of the Great Central Railway;
-) the quality and design of development;
-) greater detail needed on the environment and landscape protection;
-) reducing the impact of lighting on the countryside;
-) supporting sustainable forms of transport including provision of more buses and safe walking and cycle routes; and
-) detailed comments on the Interim Sustainability Appraisal.

The responses to consultation can be viewed in full below along with the officer responses.

**TOWARDS A LOCAL PLAN FOR CHARNWOOD
CONSULTATION RESPONSES**

RESPONSE NO/ CONSULTEE	RESPONSES	OFFICER COMMENTS
TLP/01	<p>Appendix A Having read the Core Strategy Vision, I applaud it's view of the future of the Borough. However, politicians are not very good at implementing these issues. I trust we will see all the desired outcomes with some hard work and determination of those responsible for its implementation. If not it us the residents who suffer. Please proceed with the intended plans.</p>	<p>We note your concerns, it will be important to ensure the contents of the plan are delivered to supply sufficient houses, jobs and infrastructure for the community. A new delivery test for housing is proposed in the draft NPPF which underlines its importance.</p>
TLP/05 Urgo Ltd	<p>Appendix C We have concerns on the longer term development of sites in the locality of Charnwood Road and Ashby Road because access to Spring Lane and around the top of Ring Fence/Charnwood Road is already poor. History has shown that development of this area from a primarily industrial area to residential use has not borne in mind the needs of residents and long standing businesses for access resulting in the challenges faced today. An increase of housing without suitable access could only serve to increase the volume of traffic in this area and cause more frustrations for residents (of which there would be more). For example, development of the existing Mannheim Auctions site would cause greater access issues for residents and businesses to Ring Fence, Anson Road and Charnwood Road. Increased development between Shepshed (Fairway) and the M1 would increase pressure on the already overburdened A512 Ashby Road from M1 J23 to Charnwood Road. The A512 is already very busy with the existing traffic and industrial estate vehicles in the area. We hope that whatever development is proposed considers the needs of residents and businesses, existing and future in order to be able to live and work comfortably in the locality.</p>	<p>We note your concerns regarding developments at Shepshed and potential impacts, notably on highways. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation and will be accompanied by an appropriate range of evidence, and supporting documents including transport studies.</p>
TLP/06	<p>Chapter 3 - How Much Development is Needed Charnwood councillors are elected by local people and they should reflect their opinions. The vast majority of local residents in Charnwood are opposed to any more 'development' whether it be in the form of new homes or industry. There is already too much development and it is making it increasingly difficult to get anywhere and therefore denying the majority the ability to enjoy life.</p>	<p>We note your concern regarding the need for development and its impact on travel. National policy requires that the development needs of the Borough are met. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>
TLP/07-10 Environment Agency	<p>Appendix A: Core Strategy Vision 2011-28 I support the Vision in principle.</p>	<p>We note your comments regarding the Vision, Settlement</p>

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	<p>I find the statement "The River Soar and Wreake will be improved for wildlife and people" to be vague. It does not convey what is intended. Improvement for wildlife in respect of biodiversity and River Corridor enhancement? For people does it mean the lessening of flood risk or improvements for amenity value.</p> <p>Appendix B: Areas of Local Separation and Green Wedge Review I support the existing areas of Local Separation and approve of the proposed additional Green Wedge allocations.</p> <p>Chapter 2: Context for Preparing a Development Strategy for Charnwood I find the Proposed Charnwood settlement hierarchy acceptable as it is a true representation of the position within the Borough.</p> <p>Housing Strategy Options Within the limited remit of the Environment Agency we feel we cannot recommend one option over another. Any allocation of sites should be based on the findings of the Strategic Flood Risk Assessment and the availability for the supply of potable water and the infrastructure to treat waste water.</p>	<p>Hierarchy and Areas of Local Separation and Green Wedges. We also note your comments on the housing strategy options. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation. The Plan will be accompanied by an appropriate range of evidence, and supporting documents including a Strategic Flood Risk Assessment and Infrastructure Delivery Plan.</p>
TLP/11	<p>Option 1 Leicester and Loughborough Urban Areas As a resident of Wanlip I would like to inform planners of the serious impact on local peoples lives of building additional development in the Wanlip Area, that would cause Option 1 to be an unfavourable option.</p> <p>These include the following issues</p> <p>Traffic on A46 Leicester bypass. There is severe congestion on the A46 Leicester bypass at the A6 A46 Junction 7:30 to 9:00 - 4:30 to 6:30. Additional development in this area would seriously impact travel in the area. Traffic in the village is already heavy and fast, through Wanlip at peak times. This would be increased significantly by the proposed development.</p> <p>There are limited amenities and facilities in the area such as Shops, Meeting halls, Public houses and churches for any increase in the population in and around the Wanlip area. Especially there is very little for Children and families in the local area.</p> <p>The proposed Broadnook development along with the new proposed areas of development would make the Birstall and Wanlip areas a solid area of housing. Wanlip would lose its character of a village and become an urban area. This would be detrimental to the lives of people who reside in this village</p> <p>The Urbanising of the areas around Wanlip would lead to the loss of areas of great ecological value. Woodland refuges for wildlife would be degraded and some of the flora and fauna would be lost. Additionally the Farming land in the area is of high quality which would contribute to a permanent loss of</p>	<p>We note your concerns in relation to Option 1 and the impact upon Wanlip. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p> <p>The Towards a Local Plan Consultation sought views on the broad development strategy options for the future development of Charnwood up to 2036. No decisions have been made at this stage about the preferred approach.</p>

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TLP/12 Thurcaston & Cropston Parish Council	<p>a natural resource.</p> <p>The Parish Council fully support the comments by Prof Richard Weston that Thurcaston Village should be positioned within the "Small Village or Hamlet" category, rather than in the "other settlement" category.</p> <p>Reason 1 - Thurcaston does not have the services and facilities to meet the day to day needs of the community. It does have a pub and an electrical store. It also has a suitable electricity and water supply system and a sub-standard broadband service. However those services and facilities are very limited in terms of meeting the day to day needs of the residents. It is true that historically Thurcaston had a post office and a garage but a number of decades ago these services proved to be uneconomic and were withdrawn.</p> <p>Reason 2 - Relative to all other villages listed under the "Other Settlement" levels in the hierarchy, Thurcaston's services and facilities are lacking. Whereas they are similar to or lacking relative most other settlements in the "Small Village or Hamlet" category.</p> <p>Reason 3 - Thurcaston is centrally located in one of the "Thurcaston/Cropston/The Ridgeway Area of Rothley's area of separation listed by Charnwood Borough Council and is partially located within the Soar Valley flood plain.</p> <p>It follows that Thurcaston cannot facilitate sustainable development on any significant scale, unless very significant corresponding service and facility developments are realised in what is a somewhat remote location. It is true however that there is potential development land in the Thurcaston area but as mentioned about this is in an unsustainable location, in a nominated area of separation and a partial flood plain. There are also ecological, locational and historical reasons why any significant housing or business development should be sanctioned in Thurcaston. Furthermore it is difficult to envisage how any significant scenario of growth in Thurcaston would reach a critical mass necessary to achieved to support improvements in infrastructure.</p>	We note your concerns in relation to the settlement hierarchy and the position of Thurcaston. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.
TLP/13-17 Campaign to Protect Rural England (CPRE)	<p>Housing Strategy Option CPRE do not consider anything other than Option 1 to be suitable, hover windfall sites in other locations should be assessed as potential with a guidance figure based on past history.</p> <p>Chapter 5 – No comment</p> <p>Appendix E – No comment</p> <p>CPRE comment .para 2.11 The only way to secure housing for all members of our Charnwood community is through higher densities and Policies to ensure this. It was successful in the Local Plan to 2004. In addition in larger urban areas land use can be increased by building upwards, particularly in Loughborough. Too much</p>	Development Strategy comments The preference for Development Strategy Option 1 is noted. A windfall allowance, housing densities particularly in Loughborough Town Centre and approach to planning for new student housing will be considered in the preparation of the new Local Plan.

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	<p>growth in the town has been given over to student accommodation, instead of high quality apartments for others. (All new student accommodation should be on campus!) Housing has not been meeting local needs by allowing low density housing.</p> <p>CPRE Charnwood comments. Relationship with the L & L SGP Chapter 2 says that this Plan will 'take account of the SGP - but does not say how it will do this, and to what extent. Is the SGP an intrinsic part of this Plan, and, if so, how can this be justified since the SGP has not even be approved yet?</p> <p>General Unplanned growth has already developments without the necessary infrastructure, particularly in the Service Centres.</p> <p>Traffic being generated by developments are now on the increase due to the use of delivery vehicles from food stores, and internet shopping.</p> <p>We do not see where this is being addressed. The traffic growth in the future will inevitably be driven, hence increased, by this advancing form of shopping.</p> <p>The present Local Plan (2028) is being Developer driven, it is hoped that the new Local Plan can address this.</p> <p>Sustainability Appraisal Comments Additional comments on the following points. The complexity of the SA is such that it is impossible for anyone not equipped with professional qualifications to be able to respond effectively. Whilst it is understood that the need for this is established, it nonetheless results in only a minority, usually with developer interests, to be able to comment. However CPRE have attempted to do this.</p> <p>SA Framework table 2.2 1 Landscape 2 Biodiversity and Nature Conservation 5 Land Use.</p> <p>CPRE Support the above</p> <p>(7) Climate Change Needs to address the inclusion of requiring development to provide car charging points (electric)</p> <p>(11) Population The Objectives do not address the potential of affordable Market housing i.e. low cost housing for sale</p>	<p>The Draft Local Plan will explain clearly the relationship with the SGP.</p> <p>We note your concerns about the impact of traffic. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p> <p>Sustainability comments Comments about the complexity and technical nature of SA are noted as are the comments on the SA Framework and Objectives.</p> <p>Whilst the SA Framework has been set to appraise the effects of the Charnwood Local Plan, the responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will include policies on a range of issues including climate change and housing mix.</p> <p>We note your comments regarding the housing strategy option, housing density, infrastructure and traffic. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local</p>

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	<p>on the open market as opposed to affordable housing managed by Housing Associations. Management of an appropriate mix of housing is not included in the Potential Indicators.</p> <p>We would suggest that Planning Approval should be refused if an appropriate mix of housing is not met in the application. (As included in Potential Indicator for Biodiversity and Nature Conservation)</p>	<p>Plan which will be published for consultation.</p>
<p>TLP/18-21 Quorn Parish Council</p>	<p>2.10 Are any available sites that are not included in the Strategic Housing Land Availability Assessment There are small areas within the Parish of Quorndon which are not part of the SHLAA that may become free for development during the plan period but will contribute only small numbers.</p> <p>2.21 Areas of Local Separation and Green Wedges Review Quorndon Parish Council (QPC) has for many years expressed its concerns regarding the maintenance of the green wedge between Loughborough and Quorn and therefore, fully supports the proposed 'new' Area of Local Separation between Loughborough and Quorn detailed in the 'Charnwood Borough Council Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation Methodology and Assessment Findings Report'. It also continues to support the area of separation between Quorn and Mountsorrel. Further, it fully supports the policy in general, believing the designation of such space around the village through the local and neighbourhood plan helps to have distinctive villages and maintain the individual character of each settlement which contributes to a sense of identity and the wellbeing of residents.</p> <p>2.34 Settlement Hierarchy Assessment QPC has no reason to disagree with this assessment and has contributed to the 'Charnwood Settlement Hierarchy Assessment Services & Facilities Criteria' however, it does not agree that the 3M Healthcare Sports and Social Club is within the Parish boundary as this is in Loughborough. 2.34 Settlement Limits to Development Assessment - QPC is currently developing a Neighbourhood Plan and has developed a specific Settlement Boundary/Limits to Development methodology which has been agreed through the extensive community consultation undertaken and which is consistent with the approach adopted by Charnwood Borough Council. Although it is in agreement that update changes are required, it proposes that the Quorn NP limits be those adopted for the Charnwood Local Plan.</p> <p>3.00 How Much Development is Needed Quorndon Parish Council would like to stress that under the current Local Plan the service centres (including Quorn) have taken more housing than was required. It does however, appreciate the pressure that Charnwood is under to meet the increased need to provide additional new homes but at the same time wishes to maintain the attractiveness of the village, its strong sense of identity and the green space separating it from Loughborough and the surrounding settlements. The Council are in the process of developing a Neighbourhood Plan and through this process a Strategic Sustainability Assessment (SSA) and a comparison of housing supply options is being completed. Working in partnership with landowners and Charnwood Borough Council this will enable a positive SSA process</p>	<p>We note your comments regarding areas of local separation and green wedges, the proposed settlement limits to development, the correction to the hierarchy village assessment, the housing development strategy, housing targets at a local level, the SHLAA and land availability. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>that meets a housing target and affordable housing requirements however, as this consultation document does not contain a housing target for Quorn and this does present difficulties. QPC believes that the local plan should set out a housing requirement figure for the designated neighbourhood areas. All the Quorn Strategic Housing Land Availability Assessments (SHLAA) sites are being accessed but many are restricted due to access or flood restrictions, so it is unlikely that the Quorn sites will be able to deliver many homes.</p> <p>4.50 Broad Locations for Housing Development Of the options presented Quorndon Parish Council would support Option 4 - Proportionate Distribution. Whilst it is understood that there are constraints in some Settlements to accept their full proportion it is believed that the load should be spread as evenly as possible. It is also appreciated that the Urban Centre does have the opportunity to develop and provide more innovative housing solutions in the form of high rise flats, apartment buildings, maisonettes, and town housing than can necessarily be accommodated in other settlements. Whilst it is also understood other settlements, small villages and hamlets may not have the necessary infrastructure for major expansion, proportionate distribution would allow these areas to develop and keep the settlements alive and to prosper.</p> <p>5.00 Sites that are Available Quorndon Parish Council supports the need to retain employment areas within the parish and appreciates the need for new employment land in order to release poorer quality sites for other uses.</p>	
TLP/22-23 Canal & River Trust	<p>2.16 Within Charnwood the Canal & River Trust owns and operates over 25km of the River Soar/Grand Union Canal Navigation. The Trust is a company limited by guarantee and registered as a charity. It is separate from government but still the recipient of a significant amount of government funding.</p> <p>The Trust has a range of charitable objects including: 1 To hold in trust or own and to operate and manage inland waterways for public benefit, use and enjoyment; 2 To protect and conserve objects and buildings of heritage interest; 3 To further the conservation, protection and improvement of the natural environment of inland waterways; and 4 To promote sustainable development in the vicinity of any inland waterways for the benefit of the public.</p> <p>Within Charnwood the Canal & River Trust own and operate over 25km of the River Soar/Grand Union Canal Navigation which is an important feature within the Borough, passing through both urban and rural areas. The waterway is a multi-functional resource, being a valuable 200 year- old historic asset forming part of the industrial heritage of the area as well as providing an important green infrastructure asset and wildlife habitat. The waterway also provides a valuable leisure and recreational resources for both local communities and visitors. The value and potential of the waterway should therefore be fully taken into account by the Local Plan.</p>	We note your comments on the River Soar/Grand Union Canal Navigation and its value as a recreational, heritage and leisure asset and the need to consider the impacts and opportunities from development close to the waterways. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.

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	<p>2.26 Within Charnwood the Canal & River Trust own and operate over 25km of the River Soar/Grand Union Canal Navigation which is an important reminder of the industrial heritage of the area and the wider canal network developed in the 17th and 18th centuries. The heritage value of this historic waterway network should be taken into account when considering development proposals close to it and should be protected from harm and wherever possible, opportunities to enhance this important asset should be taken.</p> <p>2.35 Within Charnwood the Canal & River Trust owns and operates over 25km of the River Soar/Grand Union Canal Navigation. We consider that new development proposals adjacent or near to canal towpaths should consider whether improvements to the waterway infrastructure in the form of the provision of new or improved access to the towpath or upgrades to the quality and durability of the towpath surface should be incorporated into proposals and be the subject of developer contributions.</p> <p>The River Soar/Grand Union Canal Navigation and its towpath are valuable leisure and recreational resources for both local communities and visitors. Canal towpaths can play an important role in providing a traffic-free environment for walkers and cyclists both for commuting and for leisure and recreation. The waterway itself is also a leisure resource, used for sporting activities such as rowing and canoeing. New development close to the waterway should take this into account- ease of access to the waterway is important in encouraging local communities to utilise this valuable resource, which can contribute positively towards improving health and wellbeing in the wider population of the Borough.</p> <p>Increased use of towpaths also increases maintenance liabilities, and this needs to be acknowledged when new development is proposed close to the waterway if the towpath is to fully realise its potential as a sustainable walking and cycling route, as well as encouraging healthier lifestyles. The Trust maintains towpaths according to their current levels of usage, and where new development is likely to result in increased use of the towpath, the Trust expects developers to contribute towards any improvements required.</p> <p>5.4 Consideration of any housing sites located in proximity to the River Soar/Grand Union Canal Navigation should include the potential impact that they may have on the waterway, whether this is a direct effect on the physical structure of the waterway (for example from imposing loadings on the canal wall or associated structures from building close to it, or increasing vehicle use over canal bridges) or impacts on the character, appearance, biodiversity or heritage value of the waterway.</p> <p>5.5 Consideration of any employment sites located in proximity to the River Soar/Grand Union Canal Navigation should include the potential impact that they may have on the waterway, whether this is a direct effect on the physical structure of the waterway (for example from imposing loadings on the canal wall or associated structures from building close to it, or increasing vehicle use over canal bridges) or impacts on the character, appearance, biodiversity or heritage value of the waterway.</p>	

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<p>TLP/24-25 Nanpantan Ward Residents Group</p>	<p>Chapter 2 1. We need an area of local separation bounded as follows</p> <p>Nanpantan Road, Loughborough The Outwoods Woodhouse Lane, Loughborough Bramcote Road Woodhouse village</p> <p>This area approximately equates to the areas covered by PSH 172, PSH 284, PSH106.</p> <p>The area of local separation would be consistent with the views of HM Planning Inspector at the inquiry.</p> <p>Ref: APP/X2410/W/15/3028159 Land south of Nanpantan Road, Loughborough, Leicestershire</p> <p>He said...</p> <p>..., I find that the loss of BMV agricultural land here is a consideration that would be at odds with the aims of relevant national and local policy, and falls on the negative side of the planning and ... I find that the proposed development would harm the character and appearance of the area, and would conflict with relevant development plan policies. This harm and policy conflict weighs heavily against the proposal.</p> <p>2. We need a area of local separation equating to area PSH 133 - Land off Snells Nook Lane This are would prevent [more] development adjacent to the ancient Burleigh Wood and would provide a barrier between residential homes and the proposed Science and Enterprise Park</p> <p>3. We need an area of local separation at the end of Leconfield Road This are would prevent [more] development adjacent to the ancient Burleigh Wood.</p> <p>Appendix A The recommendation made by The National Association of Residents' Associations to the recent NPPF Consultation is that...</p> <p>"the Strategic Plans of [relevant] LPAs should be obliged to include cogent plans for student accommodation in their areas of control and defined plans to manage HMO and PBSA development."</p> <p>Charnwood would release many family homes back onto the market by reducing the number of HMOs in Loughborough This could be achieved by working strategically with the University and developers of Purpose Built Student Accommodation (PBSA) to provide more student-bedrooms and drive-down the demand for student-lets in former family homes that have been converted to C4 Use Class.</p>	<p>We note your comments relating to areas of separation and student accommodation. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will include policies on a range of issues including Houses in Multiple Occupation and Purpose Built Student Accommodation and be published for consultation.</p>

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	<p>As a start point, the objective should be that no more than 10% of total undergraduates and postgraduates should be accommodated in student lets. This would mean that approximately 1500 students would reside in student-lets at any given time; the balance would be split between the University (60% of total) and PBSA (30% of total) Towards a Local Plan for Charnwood.</p>	
<p>TLP/27-28 Barrow upon soar Parish Council</p>	<p>Barrow upon Soar is an overdeveloped village service centre. The road infrastructure cannot support further traffic generated by extra housing. Traffic problems are further exacerbated when Slash Lane floods and the village becomes a through route from Sileby. The road transport survey conducted in 2016 by LCC supports this. Other facilities that are necessary to support a service centre such as schools, doctors, and adult recreational services are grossly inadequate. Barrow has no secular youth services, no indoor sports facilities, and limited outdoor sports facilities. The village car park is also not adequate to support the use of existing core facilities. The village cannot support appendix D which shows Barrow as having a capacity for a further 1,055 homes.</p> <p>Further development should be limited to those which address specific needs of the community as identified in the 2018 Barrow upon Soar Neighbourhood Plan for example housing for the elderly and infirm.</p>	<p>We note your comments and concerns regarding infrastructure and meeting local housing needs. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>
<p>TLP/29-32 Marrons on behalf of William Davis</p>	<p>The new Local Plan's Proposed Settlement Hierarchy represents a departure from the Council's adopted Core Strategy, which identified settlements on the outskirts of Leicester as part of the Principal Urban Area, and recognised Loughborough and Shepshed as a combined urban area. Instead, the Local Plan Hierarchy identifies Loughborough as the Urban Centre and Birstall, Shepshed, Syston and Thurmaston as Urban Settlements. The Local Plan recognises that urban settlements function as part of the Loughborough Urban Area in Shepshed's case or the Leicester Urban Area for the other Urban Settlements. It is suggested that this spatial relationship is recognised in the settlement hierarchy. In particular, because the subsequent broad spatial options conjoin the respective settlements with either Loughborough or Leicester to form part of the Urban Area in which all options are framed.</p> <p>The Towards a Local Plan for Charnwood discussion paper (the Local Plan) recognises that in order to meet the housing needs of the Borough, land for at least 8,100 homes that can be completed by 2036 must be found. However, the Local Plan notes that this would not provide any flexibility in order to meet changing circumstances. Furthermore, it does not take account of the potential requirement to meet some of the unmet housing needs from elsewhere. On this basis, the Council's evidence suggests that providing land for up to 15,700 would maximise the potential for the Council to maintain a housing land supply. Clearly, whilst this higher level of growth may have a greater overall impact on the environment, the evidence suggest that this level of growth can be delivered and could contribute to meeting unmet needs elsewhere. Overall, it is welcome that the Council recognises its housing requirement may need to be greater than its objectively assessed need. However, there is currently no certainty regarding when an agreement over unmet housing needs will be met or how it will be distributed. Hence 15,700 homes should not necessarily be seen as a maximum figure until matters progress with the other authorities.</p>	<p>We note your comments regarding the settlement hierarchy, housing needs and site proposal at Shepshed. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation. The Council will continue to work with the other Leicester and Leicestershire Housing Market Area authorities under the duty to cooperate.</p>

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	<p>In addition to the above, it is recommended that the Council consider the likelihood that the Borough's OAN and that of the HMA may change from the figures identified in the HEDNA 2017, in particular when the proposed Standard Methodology is applied. Enclosed with these representations is evidence prepared by Pegasus on behalf of William Davis Limited and others which was submitted in response to the recent Strategic Growth Plan consultation. It is recommended that the Council takes into account the findings of this report in determining its OAN and preparing its Local Plan.</p> <p>It is noted that Shepshed is the largest of the Urban Settlements. It is a sustainable location in which to direct further growth, with a range of services and facilities to meet day-to-day needs; sustainable travel options; a strong relationship with Loughborough (as recognised in the Settlement Hierarchy Assessment, March 2018) and the opportunity to improve areas such as the town centre or provide greater access to the natural environment. Therefore, Shepshed is well placed to play a part in any spatial strategy. Given the relatively low level of existing commitments in the town compared to the potential level of growth proposed in the Local Plan, Shepshed should attract a significant level of growth due to its position in the Settlement Hierarchy as one of the more sustainable settlements.</p> <p>In terms of potential growth options around the town, these are primarily either to the west or the south. To the west, it is considered that the Black Brook is the natural defensible barrier to Shepshed and it is noted that a number developments have already crossed Tickow Lane / Oakley Road towards this boundary.</p> <p>William Davis control land in Shepshed that the Council has identified as suitable and available in the SHLAA 2017, namely Site PSH404, Land West of Tickow Lane (the Site). The SHLAA states that the onus is on the promoter to demonstrate the site is achievable against the SHLAA criteria. A Vision document for Land West of Tickow Lane, is currently in preparation which can demonstrate that there are no overriding constraints to development, including infrastructure capacity, and an appropriate masterplan can deliver approximately 450 units within the plan period. It is William Davis' intention to share this Vision document with the Council in the coming weeks in order to assist with refinement of the Local Plan evidence base.</p> <p>It is noted that there have been several planning permissions that have lapsed in recent years in Shepshed, amounting to approximately 300 dwellings, and capacity estimations for suitable sites elsewhere has been reduced. This has been down to a mixture of land being no longer available and planning and delivery issues. As land to the West of Tickow Land is being promoted by an established house builder with a strong track record of delivering homes, if the site is allocated, there is much greater certainty of delivery.</p> <p>Furthermore, the Charnwood Borough Housing Delivery Scenarios (December, 2017) report notes that there is likely to be demand in the Shepshed Sub Market housing area for more aspirational housing with an increase in employment opportunities and the ongoing regeneration of Shepshed Town Centre.</p>	

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	<p>Whilst it is accepted that this study is a desk based exercise focussing on housing delivery, it is noted that Land West of Tickow Lane appears in each development scenario.</p> <p>A design framework is proposed for the site which would create an attractive residential development. In addition it is considered that there are additional benefits in planning for a comprehensive development with land the north, if this is deemed suitable for allocation. This would provide for a scale of development sufficient to justify provision of a primary school. It would also provide for an effective bypass and downgrading of Tickow Lane. The key benefits of the Site are as follows:</p> <ol style="list-style-type: none"> 1 The allocation would be consistent with the existing Development Strategy for Charnwood in supporting the regeneration of Shepshed; 2 Further residential development could help deliver the strategy of the Shepshed Masterplan and Delivery Framework. Whilst committed development has made section 106 contributions towards town centre improvements there is still capacity for further enhancements. 3 Development would benefit from good pedestrian, cycle, and bus connectivity to the town centre, as well as having access to the A512 (Ashby Road) and the M1 Corridor avoiding existing residential areas and the town centre; 4 In landscape and visual terms, the land is well contained and does not impact on distant views of the town from the wider countryside; 5 Development would represent a seamless extension to the town, and would tie into the transport network and green infrastructure established by Buttercup Fields; 6 Existing and future residents of Buttercup Fields and other nearby residential areas would benefit from new community facilities, including a potential primary school, and improved connections to the Black Brook, Disused Railway, and countryside beyond; 7 Increasing the population in this area would improve the viability of proposed bus services within Buttercup Fields; 8 Potential for restoration and enhancement of the Shepshed Cutting SSSI, and enhancement of the ecological value of the land as a whole; and, 9 There is potential to provide greater access to accessible natural greenspace and support the delivery of the Black Brook environmental improvement zone (GIEZ4). <p>The Local Plan sets out a range of different spatial options to meet potential housing requirements. Much will depend on the overall housing requirement in determining the most suitable option. It must be recognised that the most sustainable development options are those which concentrate growth at existing settlements, due to the services and facilities already available. Crucially, the broad locations for housing development should take account of the ability of chosen areas to realistically deliver homes within the plan period.</p> <p>Further documents/information submitted with representation ref: TLP/29 to 32</p>	

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<p>TLP/33-38 Ruben Bellamy on behalf of Sturdee Poultry Farms Ltd</p>	<p>CHAPTER 2 This Section asks for comments on the update Vision for Charnwood set out in Appendix A.</p> <p>It is considered that the Core Strategy Vision 2011-2028 does not include a positive vision for the future of Charnwood's rural areas and communities. Charnwood is a largely rural District. There are only two brief mentions of rural areas in the Vision; in relation to maintaining the distinctiveness of villages and a reference to affordable housing.</p> <p>One of the core planning principles set out in the NPPF at paragraph 17 is that planning should take account of the differing roles and character of different areas. Not only does this include the character and beauty of the countryside, matters that are addressed in the Vision but also the need to support thriving rural communities, something that is not. The NPPF at paragraph 28 set out the need to support economic growth in rural areas to create jobs and prosperity by taking a positive approach to sustainable new development. Paragraph 55 sets out the policy of promoting sustainable rural development by locating housing where it would enhance or maintain the vitality of rural communities.</p> <p>The Practice Guidance states that; "It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements." and; "A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship." (ID: 50-001-20160519).</p> <p>Therefore, there should be a specific reference in the Vision to retaining local services and facilities in villages in order to maintain and enhance the vitality of rural communities enabling them to thrive.</p> <p>Paragraph 2.34 asks for views on the Settlement Hierarchy and Development Limits.</p> <p>Settlement Hierarchy The settlement hierarchy and its scoring takes no account of Government policy for rural areas as set out in the NPPF. At paragraph 29 the NPPF states that, "However, the Government recognises the different policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas." This policy is also reflect in the Planning Practice Guidance at ID: 50-001-20160519. It states; "The National Planning Policy Framework also recognises that different sustainable transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas"</p> <p>There is no assessment of what a sustainable transport solution might be in the rural areas of the District and how that should be reflected in the scoring for the settlement hierarchy. This is probably the reason why very small villages such as Swithland are scored the same as large villages such as Burton</p>	<p>We note your comments regarding rural areas, the settlement hierarchy and limits to development, housing need, housing strategy options and sites at Burton on the Wolds. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>on the Wolds due to an urban scoring for transport accessibility (see below).</p> <p>The settlement hierarchy sets out essential services as those that are defined as being needed to meet day to day needs. However, as shop is further defined as one that would allow for a 'weekly shop'. A weekly shop is not, by definition, a day to day need. For this reason this part of the methodology should be redefined. Burton on the Wolds contains a shop that is open 7 days a week that contains the range of products that one would expect to be found within a village shop. It is also a petrol station. It is important that villages with typical village shops accommodate growth to help support and maintain them.</p> <p>The settlement hierarchy methodology take not account of settlement size. Burton on the Wolds had a population (at 2011) of 1,218. Cossington had 598, Thrussington 581, Seagrave 546, Barkby 316 and Swithland 217. It cannot be correct that these 5 small villages are classified as 'Other Settlements' along with villages such as Wymeswold and Burton. To be within the same settlement hierarchy suggests that they would be able to accommodate the same level of growth which would not be the case.</p> <p>Development Limits Boundaries</p> <p>The criteria for a settlement boundary automatically excludes agricultural buildings; this blanket exclusion of agricultural buildings takes no account of the nature of those buildings and their relationship to the form of the settlement. Whether or not agricultural buildings should be included within the development limits boundary should be made on a case by case basis based on the form of those buildings (e.g. do they appear as industrial buildings or as traditional agricultural buildings) and how closely these are linked with the settlement.</p> <p>Specific objection is made to the changes made to the boundary limits of Burton on the Wolds. Currently, site PSH182 Sturdee Poultry is partly within the development limits boundary and it is proposed to remove it altogether. The site has an industrial appearance and is surround by existing housing to the north and north east and by a car repair garage to the south. It is clearly a part of the settlement and cannot be construed as open countryside.</p> <p>The whole site should be within the settlement limits.</p> <p>CHAPTER 3</p> <p>The figures set out in Table 2 are confusing as it is not made clear that the 6,451 figure is not the residual requirement for the plan period. The table should only include as commitment those number of homes that can be delivered in the plan period.</p> <p>Reference is made to the new standard methodology for calculating housing need that will be introduced shortly by the Government. Work undertaken by Barton Wilmore and available on their website suggests that the annual housing requirement will be 1045 dwellings per annum under the</p>	

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	<p>standard methodology set against the local plan figure of 994 DPA. This is a significant difference of 5%. Over the 25 year period of the plan it would equate to an extra 1,275 dwellings required.</p> <p>CHAPTER 5 We write in support of SHLAA site PSH182 Sturdee Poultry, Sowter's Lane, Burton on the Wolds for housing.</p> <p>The site is categorised as brownfield and capable of accommodating 60 dwellings. The SHLAA has asked that clear evidence is provided that the site is achievable against the SHLAA combined methodology criteria. This is set out below.</p> <p>Suitable – As the SHLAA concludes there are no physical or environmental constraints that would prevent development. There are no physical limitations such a flood risk. The site contains no heritage assets nor does it lie within the setting of any heritage asset. There would be no adverse landscape impact but a positive one, given the site is already developed with industrial style buildings. There would be an environmental and amenity improvement for surrounding residents. Approximately half of the site currently lies within the settlement boundary of Burton. Burton is classified as an 'Other settlement' and will experience growth in the future. The site is actively being considered for allocation by the Neighbourhood Planning Group. The site has good access to a primary school, a shop and petrol station, and a bus stop on Melton Road. The whole village has super fast broadband. Therefore, the site has good access to services and facilities for a rural area.</p> <p>Available - These comments are made on behalf of the site owner. The site is available for development and the landowner has entered into a promotion agreement with a Promoter to bring the site forward for housing development.</p> <p>Achievable - There is clearly a reasonable prospect of the site being delivered within the first 5 years of the plan. The Housing Delivery Study identified Burton as being within the 'Prime Charnwood' housing market area which is characterised by high sales values and good sales rates. Taking into account the demolition and remediation needed to redevelop the site, it is anticipated that the lead in time for site start to be in the region of 6 months and completion of the first dwelling some 9 months after that. In such a strong housing market and with 40% affordable housing, it is expected that the site will be able to deliver 40 dwellings per year.</p> <p>Within Burton on the Wolds there are a total of 4 sites shown on the map, including Sturdee Poultry.</p> <p>It is submitted that PSH182 is the most appropriate site to meet the future needs of the village.</p> <p>1 The poultry business has been operational on the site for some 50 years. 2 The site is almost completely covered by either buildings or hard standing. The buildings are large and</p>	

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	<p>industrial in character, with the very expansive roofscape so typical of industrial buildings but untypical of a traditional village. This has resulted in the site being classified as brownfield within the SHLAA and being entered on Part 1 of the Brownfield Register.</p> <p>3 The redevelopment of the site will have a beneficial impact on the character and appearance of the landscape. It is an obvious point but one worth making - any redevelopment of such a site will inevitably have less impact than the development of a greenfield. However,, in this case the removal of the unsightly buildings described above have a beneficial impact.</p> <p>4 The redevelopment of the site for housing will have a beneficial impact on the amenity of the whole of the village as the odour that is an inevitable by product of this type of use, would disappear. Surrounding residents are would also benefit from the reduction in noise.</p> <p>5 The site does not encroach into the open countryside surprising the village. The site is very integrated into the villages physical form. The northern half of the site sits within the Limits to Development boundary as this part lies between houses in St Philips Road and development fronting Sowters Lane. The southern part of the site is adjoined to the south and east by Turvy Motors car repair yard.</p> <p>Site PSH289 Land off Loughborough Road is a greenfield site. The SHLAA makes reference to part of the site being in Flood Zone 3:</p> <p>1 There is no reference to the agricultural land quality grade of the site. The site could be within the best and most versatile grade range (1 - 3a) given it is in arable use.</p> <p>2 Development of the site would clearly have a negative landscape impact, as an open greenfield would be replaced by development.</p> <p>3 development of the site would result in encroachment into the open countryside as the site extends well beyond the current edge of the settlement, particularly that create by Springfield Close.</p> <p>4 The site is the setting for a designated heritage asset - numbers 32 and 34 Seymour Road. These are Grade II listed buildings which were originally a single large house from the late 18th century which was subsequently divided.</p> <p>5 The site is the setting for an undesignated heritage asset - Seymour House and its associated barn complex</p> <p>Site PSH13 Land near Fishpond Plantation is a greenfield site. Our observations on Site PSH13 are;</p> <p>1 There is no reference to the agricultural land quality grade of the site. The site could be within the best and most versatile grade range (1 - 3a) given it is in arable use.</p> <p>2 Development of the site would clearly have a negative landscape impact, as an open green field would be replaced by development,</p> <p>3 Development of the site would result in encroachment into the open countryside as the site lies well beyond Springfield Close, and Towles Field and the playing field.</p> <p>4 The site boundary is an irregular share and has no frontage to Loughborough Road. As a result any development would be out of character with the village.</p>	

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	<p>Site PSH163 land adjacent to 6 St Mary's Close is a greenfield site. Our observations on Site PSH163 are:</p> <p>1 The site is crucial to the setting of a designated heritage asset - Burton Hall. Burton Hall is a Grade II listed building from the late 18th century. Any development of this site is highly likely to cause substantial harm to the setting of this listed building.</p> <p>2 There is no reference to the agricultural land quality grade of the site, albeit the site is in pasture.</p> <p>3 Development of the site would clearly have a negative landscape impact, as an open green field would be replaced by development</p> <p>4 The site is an important green open space that extends into the centre of the village, the development of this open land would adversely affect the character of the village.</p> <p>Site PSH97 Land adjacent 79 Melton Road. The SHLAA makes reference to part of being within Flood Zone 3. Our observations on site PSH97 are;</p> <p>1 The site is Ridge and Furrow and, therefore, a heritage asset would be totally destroyed by development on this site.</p> <p>2 Development of the site would clearly have a negative landscape impact, as an open greenfield would be replaced by development.</p> <p>3 Development of the site would result in encroachment into the open countryside. Notwithstanding the Seal's Close estate, the perceived settlement edge from Melton Road, is Sowter's Lane. The site extends well beyond this.</p> <p>4 There is no reference to the agricultural land quality grade of the site, albeit the site is in pasture.</p> <p>5 Development of the site would clearly have a negative landscape impact, as an open green field would be replaced by development.</p> <p>Our conclusion is that Site PSH182 Sturdee Poultry Sowter's Lane performs much better in terms of impact that the alternative sites available.</p> <p>As set out in the NPPF and the Planning Practice Guidance, it is important to recognise the particular issues facing rural areas in terms of housing supply and affordability. Burton in the Wolds is described as 'Prime Rural' by the 'Housing Delivery Study and experiences the well documented social issues affecting desirable rural areas. And, as noted in the Planning Practice Guidance, a thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities.</p> <p>All of the options put forward will have the positive impact of providing the much needed housing for the village. This would include downsize housing for the elderly, starter homes and larger family homes that would enable the elderly, the young and grown families to stay in the village. However, it is the case that the green field options all have significant negative environmental impacts that would have to be</p>	

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	<p>balanced against the positive social and economic impact of new housing. Only site PSH182 - Sturdee Poultry can demonstrate a series of positive environmental impacts. As a result it clearly represents the best option to meet village's future needs. It is our understanding that there is considerable support for the redevelopment of the site locally, particularly to enable the environmental and amenity enhancements outlined above to be achieved to the benefit of the whole village.</p> <p>HOUSING STRATEGY OPTIONS</p> <p>Paragraph 4.8 asks for views on the amount of housing to provide the right balance of meeting needs, flexibility and control whilst protecting the environment. There is a very real danger that, in planning for the minimum 8,100 dwellings - a figure that would be below the standard methodology figure by 5%, the LPA would simply put itself into a position, in a very short space of time, whereby it would not be able to demonstrate a 5 year supply of housing land. This gap in delivery would be met by speculative planning applications assessed under the tilted balance test in paragraph 14 of the NPPF and, more importantly, the housing needs of the District not being met with the consequent impact on peoples' lives. This is particularly the case if the housing strategy option eventually promulgated by the local plan is one which provides for the majority of the delivery from urban extensions at Leicester and Loughborough. This means the housing supply chain will be made primarily of very similar large sites, built out by the mainstream large house builders. It is an 'eggs in one basket' approach which delivers a very similar product, from very similar sites by very similar house builders, all of which results in slower delivery.</p> <p>The Housing Delivery Study (2017) found that, despite the apparent attractions of the market and area, the sales values and sales rates of Loughborough and the Leicester Fringe market areas do not reflect these attractions (see Figure 10). The report speculates that this may be due to a lack of 'place making'. Our speculation is that offering the same products, from a limited range of builders in very similar locations is perhaps an important factor, given that Loughborough and Leicester already exists as places. The Letwin Review has already highlighted, via the interim findings, that market absorption rates on such large sites is at the root of the apparent gap between planning permissions granted and houses delivered.</p> <p>Therefore, it is important that the higher range is planned for but also that this higher figure must be made up of a variety of sites; sites that vary, size and location and consequently product and purchaser. This will ensure that the housing delivery target is met. Therefore, of the two options presented, the local plan should seek to accommodate the higher 15,700 housing figure.</p> <p>Paragraph 4.9 asks for views on the related issue of site size. The Government's White Paper and the proposed changes to the NPPF identify that Local Authorities are not allocating the range of sites necessary to enable and encourage Small and Medium Enterprise house builders (SME). There are SME house builders that look to build sites of 10 dwellings or fewer, others are in the market place for 10 - 40 dwelling sites, others in the range of 20 - 80 dwellings. Above 80 units sites become attractive to the major house builders. It is also the case that small to medium sized sites are attractive to Self and</p>	

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	<p>Custom Build Houses. Therefore, it will be important to allocate enough sites within each range in order that delivery targets are met.</p> <p>The text suggest that smaller and medium sized sites do not deliver infrastructure. This is not the case; via Cil or Section 106 or a combination of both, contributions can be taken from small sites and pooled. This is especially the case as it seems likely that the restrictions against pooling Section 106 agreement contributions will be lifted.</p> <p>In terms of the 7 suggested growth options, it should be noted that all options will have their advantages and disadvantages and that all options will have negative environmental impacts to one degree or another. Past experience in Charnwood and emerging national evidence on delivery rates suggest that an over reliance on large urban extension sites around Loughborough and Leicester, and, or in combination with, a new settlement will not deliver the necessary housing within the plan period. Therefore, Options 1, 5, 6 and 7 are not supported.</p> <p>Option 2 concentrates growth at Leicester and Loughborough but also include Service Centres. This approach would conflict with the approach to sustainable development in rural areas set out in the NPPF (see below).</p> <p>This leaves 'Option 3 - Settlement Hierarchy Distribution' and 'Option 4 - Proportionate Distribution'. Both of these options would enable Charnwood to meets its housing target in a sustainable way within the plan period. The key will be making sure that the correct range of sites is allocated and that the rural parts of the District, namely, the Service Villages and Other Settlements so that they can play a full role in meeting these needs. One of the Core Planning Principles of the NPPF (paragraph 17) is that plan making should support thriving rural communities in the countryside. The NPPF also requires that planning policies support economic growth in rural areas and promotes a strong rural economy (paragraph 28). To promote sustainable developing rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. The Planning Practice Guidance states at ID: 50-001-20160519;</p> <p>1 It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. This is clearly set out in the National Planning Policy Framework, in the core planning principles, the section on supporting a prosperous rural economy and the section on housing.</p> <p>2 A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities.</p> <p>3 Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in</p>	

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	<p>some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence.</p> <p>APPENDIX A It is considered that the Core Strategy Vision 2011-2028 does not include a positive vision for the future of Charnwood's rural areas and communities. Charnwood is a largely rural District. There are only two brief mentions of rural areas in the Vision; in relation to maintaining the distinctiveness of villages and a reference to affordable housing.</p> <p>One of the core planning principles set out in the NPPF at paragraph 17 is that planning should take account of the differing roles and character of affront areas. Not only does this include the character and beauty of the countryside, matters that are addressed in the Vision but also the need to support thriving rural communities, something that is not. The NPPF at paragraph 28 sets out the need to support economic growth in rural areas to create jobs and prosperity by taking a positive approach to sustainable new development. Paragraph 55 sets out the policy of promoting sustainable rural development by locating housing where it would enhance or maintain the vitality of rural communities.</p> <p>The Practice Guidance states that; "It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements." and; "A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship." ID: 50-001-20160519).</p> <p>Therefore, there should be a specific reference in the Vision to retaining local services and facilities in villages in order to maintain and enhance the vitality of rural communities enabling them to thrive.</p> <p>APPENDIX D The Appendix D table refers to 'Table 3' for a settlement list of the "Other Settlements and 'Small Villages'. However, Table 3 is a Housing Supply table showing housing completions and commitments for the whole district. It does not set out the capacity of each settlement with the 'Other Settlement' and 'Small Villages' categories.</p>	
TLP/39	<p>As residents of Shepshed [REDACTED]</p> <p>[REDACTED] YOU QUITE OBVIOUSLY DON'T GIVE A STUFF about our views. If you did you would not be forcing us to move house & stop our hobby. [REDACTED]</p> <p>[REDACTED] We will be glad to be leaving the area as soon as we can. YOUR PATHETIC ATTEMPT AT CONSULTATION IS AN INSULT TO ALL RESIDENTS.</p>	We note your comments.
TLP/40	<p>The plan proposes another 1500 plus houses for Syston, is this in addition to the sites that have already been developed or are in the process of seeking planning permission? At this rate the town will become an urban sprawl as it merges with Thurmaston and Queniborough. I presume that in all areas of</p>	We note your concerns regarding development at Syston. The responses

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	<p>proposed development there will be the provision of more school places as most schools are at capacity. The infra structure would need to be overhauled as the centre of Syston is difficult to negotiate, as no one seems to know what to do at the roundabout and lorries are hard pressed to turn. There is also the problem of flooding both in Syston and Thurmaston. Some building has already impinged on the flood plain for example in Mountsorrel. As more and more of farm land is obtained by developers, how will we manage to sustain food production because people need food as well as houses.</p>	<p>received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p> <p>The Towards a Local Plan Consultation sought views on the broad development strategy options for the future development of Charnwood up to 2036. No decisions have been made at this stage about the preferred approach.</p>
<p>TLP/41 Marine Management Organisation</p>	<p>The Marine Management Organisation (MMO) is a non-departmental public body responsible for the management of England's marine area on behalf of the UK government. The MMO's delivery functions are; marine planning, marine licensing, wildlife licensing and enforcement, marine protected area management, marine emergencies, fisheries management and issuing European grants.</p> <p>Marine Licensing Activities taking place below the mean high water mark may require a marine licence in accordance with the Marine and Coastal Access Act (MCAA) 2009. Such activities include the construction, alteration or improvement of any works, dredging, or a deposit or removal of a substance or object below the mean high water springs mark or in any tidal river to the extent of the tidal influence. You can also apply to the MMO for consent under the Electricity Act 1989 (as amended) for offshore generating stations between 1 and 100 megawatts in England and parts of Wales. The MMO is also the authority responsible for processing and determining harbour orders in England, and for some ports in Wales, and for granting consent under various local Acts and orders regarding harbours. A wildlife licence is also required for activities that that would affect a UK or European protected marine species.</p> <p>Marine Planning As the marine planning authority for England the MMO is responsible for preparing marine plans for English inshore and offshore waters. At its landward extent, a marine plan will apply up to the mean high water springs mark, which includes the tidal extent of any rivers. As marine plan boundaries extend up to the level of the mean high water spring tides mark, there will be an overlap with terrestrial plans which generally extend to the mean low water springs mark. Marine plans will inform and guide decision makers on development in marine and coastal areas. On 2 April 2014 the East Inshore and Offshore marine plans were published, becoming a material consideration for public authorities with decision making functions. The East Inshore and East Offshore Marine Plans cover the coast and seas from Flamborough Head to Felixstowe. For further information on how to apply the East Inshore and Offshore</p>	<p>We note your comments regarding the marine area. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>Plans please visit our Marine Information System. The MMO is currently in the process of developing marine plans for the South Inshore and Offshore Plan Areas and has a requirement to develop plans for the remaining 7 marine plan areas by 2021.</p> <p>Planning documents for areas with a coastal influence may wish to make reference to the MMO's licensing requirements and any relevant marine plans to ensure that necessary regulations are adhered to. For marine and coastal areas where a marine plan is not currently in place, we advise local authorities to refer to the Marine Policy Statement for guidance on any planning activity that includes a section of coastline or tidal river. All public authorities taking authorisation or enforcement decisions that affect or might affect the UK marine area must do so in accordance with the Marine and Coastal Access Act and the UK Marine Policy Statement unless relevant considerations indicate otherwise. Local authorities may also wish to refer to our online guidance and the Planning Advisory Service soundness self-assessment checklist.</p> <p>Minerals and waste plans and local aggregate assessments</p> <p>If you are consulting on a mineral/waste plan or local aggregate assessment, the MMO recommend reference to marine aggregates is included and reference to be made to the documents below:</p> <ul style="list-style-type: none"> • The Marine Policy Statement (MPS), section 3.5 which highlights the importance of marine aggregates and its supply to England's (and the UK) construction industry. • The National Planning Policy Framework (NPPF) which sets out policies for national (England) construction minerals supply. • The Managed Aggregate Supply System (MASS) which includes specific references to the role of marine aggregates in the wider portfolio of supply. • The National and regional guidelines for aggregates provision in England 2005-2020 predict likely aggregate demand over this period including marine supply. <p>The NPPF informed MASS guidance requires local mineral planning authorities to prepare Local Aggregate Assessments, these assessments have to consider the opportunities and constraints of all mineral supplies into their planning regions – including marine. This means that even land-locked counties, may have to consider the role that marine sourced supplies (delivered by rail or river) play – particularly where land based resources are becoming increasingly constrained.</p>	
TLP/42	<p>I note the number of new housing quoted as being needed and the list of sites but would support Option 7 New Settlement.</p> <p>The current situation has seen new housing being built unequally across Loughborough and Charnwood. Some having very few built. Those with large scale building such as Shepshed lose their identity and the lack of improved infrastructure means enormous problems and resentment against house building.</p>	<p>We note your comments regarding the location of new housing and your support for a new settlement. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be</p>

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	<p>I feel the Borough can no longer extend these villages/Town anymore and it's now the time for a strategic standalone settlement – 8/10k houses to be agreed instead.</p> <p>I would also like to see within this settlement new council housing included of a large scale. I do not mean affordable housing which is not to most but council housing. Other Councils are doing this with Right to Buy period being extended and by forming cooperatives</p>	published for consultation.
TLP/43 National Farmers' Union (NFU)	<p>Thank you for consulting the NFU about the Charnwood local plan. Our general comments on the proposed plan are as follows:-</p> <p>The NFU has 4,800 farmer members out of the 6,000 farmers in the East Midlands region who are commercial farmers. About 70 per cent of land within this part of Leicestershire is farmed. The viability and success of farmers in Charnwood is crucial to the local economy and the environment. Farmers need local plan policies which enable:-</p> <ul style="list-style-type: none"> - New farm buildings needed by the business. This could be for regulatory reasons (e.g. new slurry stores) or because new or more crops and livestock are being farmed (grain stores, barns, livestock housing etc). - Farm and rural diversification. Some farmers will be in a good position to diversify into equine businesses, on farm leisure and tourism and in other sectors which will help boost the local economy and support the farm business. - On farm renewable energy. Farms can be ideal places for wind turbines, pv, solar, anaerobic digestion, biomass and biofuels plant provided they do not cause nuisance to others. The UK must meet a target of 15% renewables by 2020. Currently we are not meeting this target but on farm renewables can help us to meet it. - Conversion of vernacular buildings on farms into new business use or residential use. This enables parts of older buildings to be preserved whilst helping the economy and the farm business. <p>Fast broadband and mobile connectivity. Rural businesses depend on these but so often these are not provided and planning can be an obstacle to their provision rather than the enabler that it should be.</p> <p>The NFU will be looking to see that the plan has policies which positively encourage the above and do not deter them because of, for example, restrictive landscape designations and sustainable transport policies which imply that all development needs to be by a bus stop. There can also be issues about new buildings being sited too close to noisy or smelly farm buildings which cause nuisance to new householders and lead to abatement notices being served on longstanding businesses. We would urge the local planning authority to be especially careful before granting permission to residential development near to bad neighbour uses.</p>	We note your comments relating to farming and agriculture. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.
TLP/44	<p>What is the point of this out of date survey when thousands of houses have been built in Sileby and the other surrounding villages since 2011. Everything about these villages is out of date. If you go on the figures of 2011 nothing will be relevant. What a waste of time and our money.</p>	The consultation document takes account of the developments which have been

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		completed and permitted since 2011 and invites views to inform the Draft Local Plan which will cover a plan period up to 2036. Consultation responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be accompanied by an appropriate range of up to date evidence, and supporting documents including housing numbers.
TLP/45	<p>We are appalled at the way the local people here are being disregarded in any say how we are being made to change our way of life [REDACTED] we are country folk not townies [REDACTED] NO ONE WOULD LISTEN TO ENOCK POWEL being overrun & we are, we don't want light pollution, our horses & cattle being frightened to death [REDACTED], all the rubbish being dumped in hedges & gateways from the these estates, no one gives a stuff for the local population any more in this now 3RD WORLD country dirty dangerous drugged up it seems lawless place, other countries put there own FIRST before outsiders, there are thousands of EMPTY council houses & private that should be forced by the government to be renovated then rented or sold, doesn't anybody have any common-sense anymore in this country! [REDACTED] [REDACTED] this area will be gridlocked with traffic as Barkby & Barkbythorpe is a mega RAT RUN now, hedges being smashed down on a regular basis railings broken through idiot drunk drugged up irresponsible so called drivers . So NO NOT SUSTAINABLE the roads here are a joke never properly resurfaced & maintained just bodged now & then worst roads in Europe and the joke road TAX being ramped up . FARMING COMMUNITY tractors large machinery & hundreds of cars DO NOT MIX. We know no one takes any notice of what we think we are dictated to by a few who they think they know better than everyone else & that's what I think like a lot of other people.</p>	We note your concerns. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.
TLP/46	Well my Mum has just received your letter regarding local future planning, would there really be any point to putting our views forward, what about keeping the street lights on for a start, instead we are plunged into darkness from midnight which in turn is a perfect setting for house break ins, still as long as it saves money for you!	We note your comments and will pass them to the relevant department.
TLP/47 Thurcaston & Cropston Parish Council	<p>Within the Settlement Hierarchy Assessment document, Thurcaston Services and Facilities criteria, there is an error.</p> <p>Formal Sports Provision - Sandham Bridge Road Sports Fields – This does not exist, Sandham Bridge</p>	We note your comments identifying an error in the services and facilities audit for Thurcaston/Cropston, this will

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	<p>Road is situated in Cropston. Could you please delete this from the document.</p> <p>Within Cropston Services and Facilities there should be Jubilee Park which includes a playground and it situated off Latimer Road/Sandham Bridge Road, Cropston.</p>	<p>be considered during preparation of the Draft Local Plan.</p>
<p>TLP/48 Sport England</p>	<p>It is noted that one of the Council's key corporate priorities is:</p> <p>“encouraging healthy lifestyles for all our residents through physical activity programmes and the provision of sports facilities and green spaces”.</p> <p>In reading the consultation document this priority did not apparently become evident, whilst there are references to health in a number of sections, there was no headline section which covers the health and wellbeing of residents. Sport England considers that there should be a section which covers this issue. Including such items as</p> <p>Active Travel Active Environments</p> <p>Active design - Sport England, in conjunction with Public Health England, has produced ‘Active Design’ (October 2015), a guide to planning new developments that create the right environment to help people get more active, more often in the interests of health and wellbeing. The guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The Active Design principles are aimed at contributing towards the Government's desire for the planning system to promote healthy communities through good urban design. Sport England would commend the use of the guidance in the master planning process for new residential developments. The document can be downloaded via the following link:</p> <p>http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/active-design/</p> <p>Evidence Base</p> <p>It is noted and understood that as Emerging documents the councils Playing Pitch Strategy and Indoor Sports Facilities Strategy are not yet listed as part of the evidence base. Clearly going forward these documents will have an important role in understand the needs of the existing population and proposed population. The need for new sites/facilities Para 70 2012 NPPF (positive planning) and the need to protect sites para 73/74 NPPF 2012)</p> <p>It is noted that the site allocations plan and the SHLAA list a number of sites (I have not checked everyone) which are identified as playing fields.</p> <p>PSH 241 Meadow Lane PSH/E 251 Sport Ground off Leicester Road</p>	<p>We note your comments regarding health and well-being, playing pitches and incidental open space. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p> <p>The Draft Local Plan which will be accompanied by an appropriate range of evidence, and supporting documents including the open space, sport and recreation underway.</p>

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	<p>PSH 68 Beacon Road – Cannot find ref to this site in the PPS – ref by another name</p> <p>Clearly the suitability of these site for development has not yet been assessed Sport England would expect that the evidence for protection, upgrade or need replacement raised in the PPS will feature as a high priority part of the assessment. Sport England would object to the loss of any site which does not meet the requirements of our policy and para74 of NPPF.</p> <p>Impact on playing fields from adjacent development Some sites if developed, whilst not in themselves result in the loss of playing field, could be subject to prejudicial impact from the adjacent development - so for example building adjacent to school sites or sites with cricket facilities or existing artificial grass pitches. This could result in a statutory objection from Sport England.</p> <p>Incidental open space Sport England does not have a statutory planning remit to protect open space but we are concerned regarding the loss of incidental open space within residential areas or the ability to create incidental open space if sites are vacant with urban areas. Sport England’s strategy (Towards and Active Nation) seeks to move the inactive to active. Our evidence suggests that access to open space near to where people live is a strong factor to moving people from inactive to active particularly in areas of deprivation. https://www.sportengland.org/active-nation/our-strategy/</p> <p>Positive planning para 70 NPPF 2012 Number of site are identified for development these site may prove to be the right location for new or relocated sports facilities/sports pitches as identified in the PPS. A full assessment of the potential future uses for these site should be undertaken before they are allocated and ultimately redeveloped.</p>	
<p>TLP/49 Barkby and Barkby Thorpe Action Group (BABTAG)</p>	<p>1 For the villages of Barkby and Barkby Thorpe and the eastern edge of Thurmaston none of the options for locating the houses purported to be needed by 2036 is in anyway attractive. The villages face a future of encroaching housing estates which will downgrade the rural nature of the community, deal a blow to the farming community, add to congestion on local roads and put pressure on local services.</p> <p>2 In the many meetings with planners and Charnwood councillors over the existing Local Plan the huge housing scheme of the North East of Leicester SUE was sold to local residents on the premise that the green fields around their villages would be spared piecemeal development. The expectation was that the planners and the council would reject opportunistic planning applications because the SUE would meet local housing needs. This “contract” has already been broken with permissions for hundreds of houses being granted in nearby Queniborough since the adoption of the current Local Plan and appears to have been forgotten in the thrust of the new Local Plan particularly with regard to the inclusion of the SHLAA options of PHS7 (land west of Barkby 111 houses) PSH8 (land east of Barkby 690 houses) and PSH 69 (land SE of Syston (1200 house). Should any of these options be adopted in the Local Plan</p>	<p>We note your concerns regarding future development close to Barkby and Barkby Thorpe and surrounding villages, green infrastructure, the Strategic Growth Plan and housing need. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>BABTAG will regard their inclusion as a breach of trust between the council and the local community.</p> <p>3 Option 5 and 6 of the discussion paper's so-called "reasonable development strategy options" propose concentrating development in four new stand-alone settlement areas in Charnwood, one of which may well be the 690 houses either side of Holt Lane (PSH8 land east of Barkby). If indeed this land has been identified as one of the four new settlements BABTAG vehemently opposes it. The intrusion of a large new urban settlement on a ridge visible for miles would degrade the landscape of this quiet rural area. Moreover the traffic generated by its up to 2000 residents would add to congestion of traffic through Barkby as the only obvious access would be via Holt Lane to the Beeby Road.</p> <p>4 A more positive aspect of the discussion paper are the proposals for amending areas of separation and green wedges. However, it seems a contradiction to be considering some of these very sites for new housing. The council cannot have its cake and eat it. BABTAG strongly supports retaining and enhancing all the areas of separation that maintain the integrity of Barkby and Barkby Thorpe as villages surrounded by countryside.</p> <p>5 The discussion paper claims that it has taken into account the Leicester and Leicestershire Strategic Growth Plan but beyond this mention it is silent about the LSG. Seeing that the new A46 expressway will cut a swathe through the district's countryside as it skirts Syston, Barkby, Beeby and Keyham on its way south this omission is extraordinary as the four lane highway's impact on the landscape, the environment and the rural nature of these villages will be immense. And this is before any consideration of the proportion of the 40,000 new homes along its route that will fall within Charnwood.</p> <p>6 The discussion paper is honest that there is as yet no agreed methodology for predicting population growth but then nearly doubles the doubtful number of houses (8100) needed to 15700 in case building delays cause a shortfall. BABTAG asks whether the despoiling of the landscape, the destruction of our countryside, the damage to our villages and the congestion of our roads should be permitted on such questionable premises.</p>	
<p>TLP/51 Barkby & Barkby Thorpe Parish Council</p>	<p>1) For the villages of Barkby and Barkby Thorpe and the eastern edge of Thurmaston none of the options for locating the houses purported to be needed by 2036 is in anyway attractive. The villages face a future of encroaching housing estates which will downgrade the rural nature of the community, deal a blow to the farming community, add to congestion on local roads and put pressure on local services.</p> <p>2) In the many meetings with planners and Charnwood councillors over the existing Local Plan the huge housing scheme of the North East of Leicester SUE was sold to local residents on the premise that the green fields around their villages would be spared piecemeal development. The expectation was that the planners and the council would reject opportunistic planning applications because the SUE would meet local housing needs. This "contract" has already been broken with permissions for hundreds of houses being granted in nearby Queniborough since the adoption of the current Local Plan and appears</p>	<p>We note your concerns regarding the rural areas and allocation of sites, housing strategy options, the Strategic Growth Plan and housing need. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>to have been forgotten in the thrust of the new Local Plan particularly with regard to the inclusion of the SHLAA options of PHS7 (land west of Barkby 111 houses) PSH8 (land east of Barkby 690 houses) and PSH 69 (land SE of Syston (1200 house). Should any of these options be adopted in the Local Plan BABTAG will regard their inclusion as a breach of trust between the council and the local community.</p> <p>3) Option 5 and 6 of the discussion paper’s so-called “reasonable development strategy options” propose concentrating development in four new stand-alone settlement areas in Charnwood, one of which may well be the 690 houses either side of Holt Lane (PSH8 land east of Barkby). If indeed this land has been identified as one of the four new settlements BABTAG vehemently opposes it. The intrusion of a large new urban settlement on a ridge visible for miles would degrade the landscape of this quiet rural area. Moreover the traffic generated by its up to 2000 residents would add to congestion of traffic through Barkby as the only obvious access would be via Holt Lane to the Beeby Road.</p> <p>4) A more positive aspect of the discussion paper are the proposals for amending areas of separation and green wedges. However, it seems a contradiction to be considering some of these very sites for new housing. The council cannot have its cake and eat it. Barkby & Barkby Thorpe Parish Council strongly supports retaining and enhancing all the areas of separation that maintain the integrity of Barkby and Barkby Thorpe as villages surrounded by countryside.</p> <p>5) The discussion paper claims that it has taken into account the Leicester and Leicestershire Strategic Growth Plan but beyond this mention it is silent about the LSG. Seeing that the new A46 expressway will cut a swathe through the district’s countryside as it skirts Syston, Barkby, Beeby and Keyham on its way south this omission is extraordinary as the four lane highway’s impact on the landscape, the environment and the rural nature of these villages will be immense. And this is before any consideration of the proportion of the 40,000 new homes along its route that will fall within Charnwood.</p> <p>6) The discussion paper is honest that there is as yet no agreed methodology for predicting population growth but then nearly doubles the doubtful number of houses (8100) needed to 15700 in case building delays cause a shortfall. Barkby & Barkby Thorpe Parish Council asks whether the despoiling of the landscape, the destruction of our countryside, the damage to our villages and the congestion of our roads should be permitted on such questionable premises.</p>	
TLP/52	<p>I am a resident in Wanlip, a small local village in the Charnwood Borough. I have read the above plan, alongside the associated “Green Wedges and Separation” paper and appendix, and the “Interim Sustainability Appraisal”. Please find below my feedback on the above plan, as part of the consultation process.</p> <p>This will be discussed in three sections, firstly by generically considering the housing proposals under discussion. This will be followed by a more specific discussion around issues to be considered in relation to the village itself, and associated proposed local land available for building purposes, ending with specific additional considerations around individual proposals.</p>	<p>We note your comments regarding Wanlip, areas of separation and the SHLAA sites. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>GENERIC :-</p> <p>1. I support the contextual statement in 2.5 (in the Local Plan) , noting that Charnwood is a desirable place to live, due to ...(amongst others)...”our picturesque villages have retained their sense of identity” , and hope this is a key feature of future considerations.</p> <p>2. My understanding is that there is an identified need for a minimal additional 8,100 homes, and that you are also considering the ability to expand to 15,100 homes. To meet this demand you have provided 7 options.</p> <p>3. My feedback is regarding the negative impact of option 4 , “Proportionate distribution”:-</p> <ul style="list-style-type: none"> • This includes identification of development sites across all settlements , including existing hamlets and small villages. • In the Sustainability paper Option paper A4 (Lower growth/ option 4), the paper states “Option A4 is predicted to have the most negative effects on balance, and is also unlikely to generate significant positive effects. Consequently, this option is considered to perform the poorest under scenario A” <p>https://www.charnwood.gov.uk/files/documents/charnwood_interim_sa_report_april_2018/Charnwood%20Interim%20SA%20Report%20-%20April%202018.pdf</p> <ul style="list-style-type: none"> • In the higher growth scenario, the Local plan acknowledges that in option 4, “there could be negative effects on biodiversity, flood risk and air quality, and other environmental factors , including impacts for historic environment and water quality.” • This could also impact on the capacity to maintain Local Areas of Separation (as per the “Green Wedges and Separation Review paper ”), and result in a loss of local identity. (this as discussed further below making specific links to Wanlip). <p>I would suggest therefore that Option 4 (the proportionate option, which includes small villages and hamlets), should be the least favoured option , and not considered a viable option.</p> <p>WANLIP GENERIC:-</p> <p>1. Area of separation and maintaining the Wanlip Village Boundaries.</p> <p>The March 2016 Assessment of Areas of Local Separation states that :- (Page 115)</p> <p>“The gap between Birstall and Wanlip is judged to be very small in scale and particularly sensitive to change. ALS-G thus provides an essential gap between the two settlements; if encroached upon further, it is judged that the two would effectively coalesce. The area is subject to development pressures which might result in the merging of the settlements, and the AoLS helps to maintain a narrow band of land which physically separates the two and maintains their unique, contrasting characteristics. Furthermore, the wider AoLS maintains an important area of open land which provides a physical break between the two settlements, which have a strong visual relationship. Overall, ALS-G is judged to meet the purpose strongly in its entirety.” The reports goes on to say ... “ALS-G is deemed to meet the strategic role by providing an important physical separation between Birstall and Wanlip.”</p>	

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	<p>https://www.charnwood.gov.uk/files/documents/annex_a_assessment_pro_formas_march_2016/Annex%20A%20-%20Assessment%20Pro%20Formas%20%20-%20March%202016.pdf</p> <p>This is supported in the overall Charnwood Local Plan, where The Wanlip/Birstall area is still recommended as a Local Area of Separation.</p> <p>2. Any proposed further development lands are outside the 'Village Envelope', on green fields which erode the 'Area of Separation' between Wanlip and Birstall. This would set a precedent to build more houses between the two villages, which would ultimately remove the individuality and identity of an established village community. These proposals are therefore contrary to Charnwood's core strategy relating to small hamlet protection and maintaining areas of separation.</p> <p>3. Wanlip has been declared an unsustainable settlement i.e. it has no shops, schools, employment doctors surgery etc and is therefore considered unsuitable for further development. Access to public amenities such as local shops, schools etc is at least one mile from the location. There is therefore already a heavy reliance on private transport</p> <p>4. As stated within the LCC Highways objection in previous planning applications, there is no public transport, a limited number of footpaths and inadequate, accessible roads, further development would result in a significant increase in the volume of traffic in a limited area, making the village unsuitable for building further houses.</p> <p>6. It is recognised that the river Soar is prone to flooding, and some of the adjacent fields to Wanlip are classed as within the flood plain. Further building in this area is likely to increase the risk of further flooding within surrounding areas . As the LGA website states "Urbanisation has reduced the ability of land to absorb rainfall through the introduction of hard, impermeable surfaces. This results in an increase in the volume and rate of surface run-off as less water infiltrates into the ground". - See more at: http://www.local.gov.uk/flood-and-coastal-erosion-risk-management/-/journal_content/56/10180/3491683/ARTICLE#sthash.6lk0osu3.dpuf</p> <p>WANLIP SPECIFIC PROPOSALS (re building land available)</p> <p>PSH 80 – Butchers Lane Wanlip</p> <p>PSH 79 -Rectory Rd Wanlip</p> <p>PSH 72 – Wanlip Lane</p> <p>The generic issues regarding Wanlip, raised above, relate to all named 3 proposals above.</p> <p>Specifically :-</p> <p>PSH 80 – Butchers Lane:- Potential flood risk, Impact on village envelope and Local Area of Separation. Previous LCC highways objection. Lack of access to facilities. Impact on local ecology.</p> <p>PSH 79 – Rectory Rd Wanlip:- Impact on village envelope (would more than double current number of houses from 60 to 160). Lack of access to facilities. Traffic. Impact on local ecology.</p> <p>PSH 72 – Wanlip Lane Impact on expanding Birstall settlement and reducing Area of Local Separation, flood risk, traffic.</p>	

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	<p>PSH 1110 – North of Birstall (? Broadnook) I have no specific objections, as there is a need to build new houses within the area, and this will provide potentially a new settlement area. At a recent Wanlip parish council meeting we proposed that Broadnook was taken out of the Wanlip parish, which I think has been agreed (?) The only concerns I have, are regarding the increase in traffic flow and how this will impact.</p>	
<p>TLP/53 Leicestershire Local Access Forum</p>	<p>The Leicestershire Local Access Forum (LLAF) has advised numerous authorities on their plans and feels it can contribute to your present exercise. The LLAF is an independent statutory body, set up as a result of the Countryside and Rights of Way Act (CROW) 2000, and exists to represent the interests of everyone concerned with access to the countryside and the public rights of way network including footpaths, bridleways and byways, cycleways and areas of open access. We take access to include the adequate provision of sustainable and public transport and travel opportunities.</p> <p>Section 94 of the CROW act makes it a statutory function of the forum to give advice to a range of bodies, including local authorities, on access issues in respect of land use planning matters. The Secretary of State advised that in particular forums were to focus on the impact and options for minimising possible adverse effects of planning policies and development proposals, in respect of future public access to land. Forums are tasked with identifying and expressing support for opportunities to improve public access, or associated infrastructure, which might be delivered through planning policies or new developments.</p> <p>We will only be commenting on those aspects which fall within our remit or have an impact of our areas of involvement.</p> <p>We would first make some general observations. All authorities have not only to satisfy their housing needs but to also have a plan in place which demonstrates the availability of land to meet targets for the future. Without this not only do you fall down on provision but you can have developments imposed upon you where you would deem them inappropriate.</p> <p>Charnwood does have some particular problems. The area is cut by major roads (M1, A512, A6, A46 etc) and the Leicester and Leicestershire 'Strategic Growth Plan' advocates an infrastructure led approach to development with anew A46 proposed eastern distributor road to connect the A46 to the north east of Leicester to the M1 at a new junction to the south of the city which will also impact on part of the borough. The area is also cut by the river valleys and associated flood plains and has the historic Charnwood Forest Regional Park at its heart. The Park and the watercourses do need protection and give the authority challenges but they also give you the opportunity to make Charnwood a very desirable place to live, work and visit. Planning to meet the housing need will not be easy while at the same time protecting the in places unique environment</p> <p>Open spaces are invaluable for many reasons and whilst grass pitches are needed for organised sport e.g. for Rugby, Hockey, Soccer, and Cricket etc., you must provide green space which can be enjoyed for general recreation. Allotments, golf courses and school playing fields can offer wildlife oases and</p>	<p>We note your comments regarding the road network, watercourses, open spaces, the importance of footpaths and cycleways, sustainable travel, the design of neighbourhoods and the development strategy. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>improve the visual aspect from nearby paths or indeed paths crossing them. Similarly cemeteries and graveyards can provide pleasant environments for taking quiet relaxation and as such open space needs to be viewed in all its entirety.</p> <p>From our experience informal natural and semi natural green spaces serve the needs of more of the population than organised parks and of course cost far less to maintain. To enjoy these there must be an adequate network of paths and cycleways and many paths themselves provide linear open access land especially when fringed by natural growth. Green spaces of whatever designation also help to provide wildlife corridors improving the general biodiversity in the area.</p> <p>Green wedges and Area of Local Separation afford many opportunities for such considerations. They also help keep distinct communities rather than urban sprawl</p> <p>Improving the rights of way network to ensure that there are appropriate linkages between key open space sites and settlements in the district would improve access and promote more sustainable forms of transport. You cannot create new land and the only privately owned land which might become available as amenity land invariably only happens as part of a large development which itself usually means a loss of farmland. The best way to get more benefit from what is already there is to improve access and links and to an extent, public transport.</p> <p>We are firmly of the view that housing needs should be satisfied by major schemes with all the needed infrastructure rather than constantly bolting a few more properties onto the edge of small communities whose services are already badly stretched. Charnwood has many picturesque villages which have retained their strong sense of identity and these must not be subsumed into larger conurbations. In addition given that the rivers systems flood regularly impeding traffic flows badly, we are against small piecemeal developments as they do not have the scope and scale to make the needed improvements to the low lying roads</p> <p>One final consideration but a very important one is that of air quality. Many parts of Leicestershire have problems with this and any new housing being considered should whenever possible not be downwind of major traffic junctions or industrial units. One benefit of large schemes is that they afford space to plant trees to act as a buffer against pollutants but also space to create off road routes well away from motorised traffic.</p> <p>LOUGHBOROUGH – in looking at Charnwood we feel that Loughborough needs to be treated as a standalone situation without decrying its importance to the larger area as the main shopping and service centre. A vibrant and diverse economy provides many employment opportunities for local people which help keep communities together. With the strength of the science and education sectors in Loughborough these jobs include higher skilled, better paid jobs. That does mean people need housing and adequate transport and leisure areas which will impact on the nearby Soar Valley and Forest Park</p>	

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	<p>and we would like to see an enhanced off road network of routes giving access to these. We also feel a lot of the potential housing should be centred in or on the edge of Loughborough as it does have the services to support this growth. There appear to be several brown field sites available. Expansion is probably most justified to the west, towards the M1 and Shepshed although some green separation should be maintained in addition to the M1. There is also a need to accommodate the growing student numbers although we do feel these should be spread throughout the community rather than creating student areas.</p> <p>SOAR VALLEY - Thurmaston and the Watermead Regeneration Corridor offers another opportunity for a good contribution to the housing requirement. It would involve some loss of countryside and the extension of the urban area, which will make non-motorised access to the remaining countryside more difficult for existing residents and must increase the need and temptation to take the car to reach a pleasant walk, or just exercise the dog. Watermead Country Park should however never be far away and we would suggest more access points over the canal/river. Thurmaston itself is rather 'tired' and badly cut by road and rail but old warehousing units and other brown field sites could be replaced by a well balanced range of housing facing towards the park and making Thurmaston a more attractive place with a more balanced community. Economic and commercial sites would have to be provided to replace these older units and that presumably would mean in the nearby countryside.</p> <p>OTHER LARGE CENTRES – Charnwood's other larger settlements; Shepshed, Birstall and Syston have services and facilities that could support some additional housing but Syston in particular has roads close to capacity. Anstey similarly has a distinct services and retail heart but is currently seeing major housing addition and the centre has roads that are highly congested. There seems little scope for expansion here as it almost conjoins Cropston now and you have approved housing on the edge of Glenfield. Barrow upon Soar is not as well served but could possibly see a little expansion but with all these distinct communities we would wish to see green separation zones to maintain their independent identities and a network of off road routes allowing passage between them without using vehicles. Sileby is a smaller community without the services to sustain much growth but we would wish to see this kept separate from Barrow.</p> <p>The old A6 corridor is seeing infill and there is the real risk that Rothley, Mountsorrel and Quorn will lose their separate identities</p> <p>LEICESTER – Some housing could be located on the edge of the city to rely on that city for services etc. At the same time this should not effectively bridge existing communities leading to a loss of their identities. The area between Leicester and Thurmaston may offer opportunities but we would not like to see Barkby with Barkby Thorpe lose identity</p> <p>HOUSING – Looking beyond the boundaries of the borough the cities of Leicester, Derby and Nottingham add to the pressure for development. Even discounting any need for Charnwood to help</p>	

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	<p>neighbouring authorities who are struggling to meet their targets it would seem the borough needs close to 1000 new homes a year for the period under review.</p> <p>We think that evidence elsewhere suggests that the needs should be met by major 'new' developments giving the authority a chance to develop those communities holistically. We have already commented on the proposals for Garendon and Broadnook and in general we support those sorts of projects whilst having issues with some detail. The smaller villages have few services available and we see no real benefit in moiré housing in these other than to fill gaps in the provision</p> <p>Places like Barkby, Burton, Hathern, Queniborough, Rearsby, Cossington, Seagrave, Wymeswold and Thrussington might need a few smaller homes for people to retire into or start up from, to keep the communities together. The families of residents in Newtown Linford and Swithland would struggle to find start up homes to remain near their relatives. We feel that Woodhouse and Woodhouse Eaves could be viewed as one community and properties there are a bit more mixed but there are gaps in the balance. There is a need for affordable homes, both social housing for people that cannot access housing through the open market and small properties for purchase because of a growing older population and more single people.</p> <p>OPEN AREAS – Wherever housing is to be located will determine where the green separation zones will be and our prime interest is in the protection of those and the maximising of public and environmental benefit which can be had from them. To the east you have Wolds and the Wreake Valley; through the centre the Soar and to its south, Watermead; and two the west the Forest Park and it its southern edge the Rothley Brook. These are a wonderful areas; ecologically and environmentally valuable and for reasons of their topography, little developed and therefore of historic interest.</p> <p>We are not entirely sure how you define an Area of Local Separation as opposed to green wedge but we are generally supportive of any protected separation zones. We certainly would wish to see a gap between Loughborough and Quorn, Syston and Queniborough and Barrow and Sileby and do think there should be a gap between Rothley and Birstall but should that not be between Wanlip and Rothley and Wanlip and Birstall as we take Broadnook to be part of Wanlip</p> <p>SUMMARY - When considering new developments, the design of our neighbourhoods is key to promoting healthy travel habits, with local facilities such as shops, doctors, schools and other services being located to encourage routine walking and cycling. The benefits of the footpath, bridleway and cycleway networks are multi-dimensional and have impacts on sustainable travel, green infrastructure, recreation, tourism, local economies, health and general well-being. They are an essential mechanism for linking communities and facilities if we are to reduce motorised transport and the carbon emissions that ensue and they play a major part in the development of the recreational potential of any area. These benefits have to be balanced against the need to protect and enhance the ecology and landscape and enable regeneration and economic growth. These should not be viewed simply as</p>	

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	<p>competing demands but as a challenge to use best practice and/or innovative approaches to achieve good quality outcomes to meet each of the aspirations.</p> <p>We need to ensure that in the planning of our communities, access to basic amenities and services is not dependent on car ownership but is always available to those on foot, bicycle, wheelchair and public transport.</p> <p>If we are to encourage walking we need attractive places to visit. Green open spaces are great for wildlife and provide an outlet for residents to enjoy. If trees feature they are also 'lungs' helping counteract air pollution. The presence of, and access to, green areas and the natural environment can help increase activity and reduce obesity. Daily physical activity is essential for maintaining health; inactivity directly contributes to 15% of deaths in the UK.</p> <p>Larger developments are required to leave green oases but these are often overly manicured. Sewn and fertilised 'parks' are good at absorbing rainwater but rough grassland is over four times more effective and trees improve things further. Such wilder 'semi-natural' areas are also much better for wildlife. We must plan for more absorbent habitats especially in the flood plains. Wetlands and woodlands are ideal at holding back floodwaters and also provide a varied landscape for residents to access and enjoy.</p> <p>It can be a win-win situation. If we create wetland and woodland areas and green corridors linking them, we can help wildlife to migrate between populations keeping them healthier and introducing them to our gardens; can create ideal walking possibilities for the health and general wellbeing of the population and cut down the risk of flooding all at the same time.</p> <p>We would just broadly summarise our take on the issues by saying that whatever direction future housing development takes it must ensure appropriate provision of facilities such as schools, local shops, public amenity / recreation spaces and adequate off road routes between them. In as far as you can encourage private enterprises you must facilitate adequate transport facilities and opportunities of employment as close to residential areas as possible</p>	
<p>TLP/54 East Leicestershire & Rutland Clinical Commissioning Group</p>	<p>I've just had a look at this and am staggered by the amount of building plots that are in the plan in our practice area. If even a fraction are built, we will not cope.</p> <p>Our practice list size has gone up by 90 since 1st April this year and we are now at 12021 patients as of yesterday.</p> <p>[REDACTED]</p> <p>The 106 funding will help make more space to see patients but won't provide the doctors on the ground</p>	<p>We note your concerns regarding local health services. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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<p>TLP/55 Woodbrook Vale School</p>	<p>- where are they going to come from?</p> <p>Please object to the Charnwood Local Plan on the grounds that the local health services will not cope.</p> <p>I would like to raise and concern about future development of the school site.</p> <p>On the link below (see page 3) The new proposed line around our school site is next to our school buildings and the school playing fields etc are outside of the proposed new boundary.</p> <p>The concern is that we would be prevented from developing the existing school site. I am unsure as to the purpose/use of the assessment maps and assume it is for "Housing and Commercial" developments only? If that is the case then our existing lease agreement would not be affected. For your information, I have attached a map of the land within our 125 year lease with LCC.</p> <p>Can we request that the new boundary be drawn in-line with the lease map</p> <p>Can you also please confirm that if we wished to, with an appropriate planning application and approval we can further develop the site in the future within the boundary identified in our lease agreement.</p> <p>Please contact me if you would like to discuss further</p> <p>https://www.charnwood.gov.uk/files/documents/settlement_limits_to_development_assessment_maps_2018/Settlement%20Limits%20to%20Development%20Assessment%20Maps%20-%202018.pdf</p> <p>Further documents/information submitted with representation ref: TLP/55</p>	<p>We note your concerns regarding settlement limits and school expansion. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>
<p>TLP/56 Woodhouse Parish Council & King George's Charity</p>	<p>There are two issues of concern in the papers. For both parish villages there is an indication that there is 'good' access to secondary schools. However, in Woodhouse this is means a restricted MOD boarding college for 16-18 year olds; and in Woodhouse Eaves it is Maplewell Hall special school. So neither village has access to a secondary school by any standard definition. The young people at these institutions are not from this community [not that we don't love them]. Do they get counted anyway?</p> <p>Secondly, because of the MOD college, Woodhouse is listed as having recreational facilities, but these are not available to the villagers.</p> <p>I am aware that parish population figures are somewhat skewed by the errors with Woodthorpe residents noticed during the recent boundary consultation, and by the inclusion of the term-time residents at the MOD college.</p> <p>These issues crop up from time to time and it would be helpful to have them amended in the Local Plan, or perhaps an understanding of why they appear as they do.</p>	<p>We note the additional information provided regarding facilities and population. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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TLP/57	<p>1. The AECOM Non-Technical Summary</p> <p>In my middle years, I was employed in a consultancy and can recognise many of the practices appearing in the AECOM as typical of what used to appear in the reports we produced:</p> <ul style="list-style-type: none"> • Stock phrases from what in those days was a word-processor library, but adapted to fit the current project – [REDACTED] • Majoring on long, impressive – sounding words which look wonderful, but could just as easily give the intended information using everyday English. <p>It is interesting to see that such practices still give rise to “howlers”!</p> <p>Page 17 lower chart, last line shows “uncertain significant positive effect”, which is identical to the chart’s top line.</p> <p>It should read “negative”.</p> <p>Because of the “cut and paste” system page 25 upper chart repeats the “howler”.</p> <p>Apart from a brief mention at 1.2.5 page 1, and on page 6 mentioning the pressure placed on Loughborough’s permanent residents, the “plague” of students, so highly valued by C.B.C, is not considered.</p> <p>The Soar Valley floods are similarly given little mention, despite the disruption these (& the students) cause.</p> <p>2. Towards a Local Plan for Charnwood</p> <p>Congratulations on producing a well-written & understandable report.</p> <p>Concentrating as it does on how to get more houses into Charnwood it does miss some critical issues out:</p> <p>2.14 sadly ignores the “congestion & significantly delays” within Loughborough itself, which again (especially in central areas of the town where students reside in H.M.O’s) comes down to the “plague” of their cars turning many streets into one-way arteries for much of the day, & especially at the start & end of the day (plus school start/finish), with frequent collisions.</p> <p>A further horror is that such parking congestion enables a £50 charge to be imposed on ordinary residents just to park outside their own property...</p>	<p>Sustainability Appraisal</p> <p>We note your concerns about the language, presentation and robustness of the Sustainability Appraisal report.</p> <p>The responses received to this consultation will be considered and used to inform the preparation of the next sustainability appraisal report which will accompany the Draft Local.</p> <p>We note your comments regarding the sustainability appraisal, HMOs, traffic congestion and flooding. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>...which imposition would be totally unacceptable anywhere else in Europe & elsewhere, & would cause riots.</p> <p>2.25 gives scant regard to the floods which regularly occur in Charnwood, not just in the country areas, but within the town itself (e.g. Browns Lane at John Storer House, Southfield Road, even in the town centre itself where drainage is inadequate). Even Queen's Park walkways flood.</p> <p>[REDACTED]</p> <p>Loughborough has an enormous stock of H.M.O's, mainly terraced houses in the near or centre part of town all within walking distance of employment (e.g. 'C.B.C'), shops, recreation etc.</p> <p>Yet nowhere in this report is there any sign of getting the University to expand their accommodation for students, releasing housing back to residents.</p> <p>Financially these H.M.O's bring nothing to C.B.C, being exempt from Council Tax. So, if you get residents, not H.M.O's...</p> <ul style="list-style-type: none"> • Huge increase in Council Tax revenue, [REDACTED] Reduction in Council Tax rate...? • Huge reduction in traffic congestion, wonderful easing of resident parking problems (like when University on holiday)... Abolition of £50 charge to park at own house...? Reduction in No of [REDACTED] street wardens. • The release of H.M.O's. Back to the "real" residents of properties in the lower price ranges should reduce the workload of the C.B.C. Planning Dept, as the need for new developments is drastically reduced – staff could be kept at a reduced level/cost. <p>The reduced level of new developments should have beneficial results on the level of flooding in the areas currently affected.</p> <p>Despite the 2036 requirements, it is to be hoped the PP&PM Team will always remember that their priority should be to ensure Loughborough residents get a fair deal. [REDACTED]</p> <p>[REDACTED]</p>	
<p>TLP/58 GAMMA Telcom Ltd</p>	<p>Thank you for your Letter regarding the above.</p> <p>Having examined our records, I can confirm that Gamma has no owned apparatus within the search area of your proposed Works & No Objections.</p>	<p>Noted.</p>

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<p>TLP/59 Thurmaston Parish Council</p>	<p>Should you require any additional information please contact me Please see following response including comments from Thurmaston Parish Council in blue:</p> <p>National and Strategic Policy Framework Transport: <i>2.14: parts of the road network are congested and significant delays can be experienced at the Hobby Horse Roundabout in Syston.</i> It is difficult to comment in detail on the transport proposals without a detailed assessment of local impacts.</p> <p>A new A46 expressway is proposed which would connect the A46 to the north east of Leicester to the M1, encouraging strategic scale developments in the North East of the City. Given that growth is focused along major new infrastructure, the dominant mode of travel is likely to be by private car, therefore significant growth in close proximity to Thurmaston could generate increased traffic and congestion through Thurmaston.</p> <p>Areas of Local Separation and Green Wedges: There is little or no separation between Thurmaston and surrounding villages and most major new developments would take place on greenfield land.</p> <p>Access to facilities and services: <i>2.31 Thurmaston is found to function as 'Urban Settlement' with a range of services that meet day to day needs as well as excellent transport links and close relationship to Leicester and Loughborough.</i></p> <p>The above statement is wholly inaccurate - Public transport links in Thurmaston are poor. There is no railway station and the bus services serving Thurmaston are not supported by Leicestershire County Council. Arriva bus has recently withdrawn the service which previously served the 'Dales' area of the village. Additionally, there is not a regular service to Loughborough. Facilities: Doctors surgeries and Thurmaston Schools are oversubscribed.</p> <p><i>3.3 The Charnwood Core Strategy identified a regeneration corridor at Watermead to support the regeneration of Thurmaston help meet our need for jobs and maximise the potential of the Country Park.</i></p> <p>This scheme has not progressed to date, lack of funding means the proposals for a Visitors Centre on Watermead park have been withdrawn.</p> <p>Councillors raised concern about Environmental impact – Pollution and Climate Change.</p> <p>Councillors supported the following statement from CPRE:</p>	<p>We note your concerns regarding traffic impacts, areas of local separation and green wedges, availability and capacity of community services, Watermead and development strategy. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation. The Local Plan will be accompanied by an appropriate range of evidence, and supporting documents including transport assessments.</p>

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	<p>Environmentally destructive, car dependent, low density greenfield sprawl, with large dormitory suburbs and with a lack of adequate sustainable transport infrastructure.</p> <p>Your attention to the above comments would be appreciated.</p>	
<p>TLP/60 Nottinghamshire County Council</p>	<p>Thank you for consulting Nottinghamshire County Council on the Charnwood Local Plan, we have the following observation to make:</p> <p>In relation to Chapter 4 and the various housing and employment growth distribution strategy options. In order to minimise additional car traffic generated by new development and thereby reduce the amount of longer distance trips, including trips to and from Nottinghamshire, and through Nottinghamshire and beyond it is strongly recommended that Option 1 (Leicester and Loughborough urban areas) is chosen so that the existing urban areas would be the focus for new development. This option focuses development on the key urban areas with good access to jobs, services and public transport with the potential to reduce the need for long car trips viz a viz other more dispersed options for distributing growth.</p>	<p>We note your comments on the development strategy options. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>
<p>TLP/61</p>	<p>Thank you for your letter of April 2018 giving me the opportunity to express my views of Planning for Charnwood.</p> <p>It is my opinion that it is essential that villages in the County should be allowed to keep their own identity and not be over developed and consequently lose their identity.</p> <p>In Queniborough where I have lived for sixty years we have all the facilities to be self-sufficient well balanced community.</p> <p>I consider that opportunities for “first Time buyers” should be provided in areas of Loughborough where job opportunities exist and that the large demand for housing should be in new large developments in rural areas.</p> <p>It is most essential that we do not allow developments to spread from Leicester to engulf the existing County villages.</p>	<p>We note your comments regarding village identity and development. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>
<p>TLP/62 Persimmons on behalf of Charles Church</p>	<p>2.6 ‘We are therefore interested to hear your views on the vision for Charnwood in 2036.’</p> <p>The current Vision’s (Core Strategy 2011-28 – in Appendix A of the consultation document) key aspects are appropriate, in terms of meeting development (housing and employment) and infrastructure needs, encouraging new investment, as well as retaining the character of Charnwood. However, the vision does not go into enough detail on other constituent areas outside of the Leicester and Loughborough Urban Areas. As such this emphasis on these Urban Areas is somewhat restrictive on the potential new growth options (not yet decided), and provides a contradiction with regards to affordable housing provision. Paragraph 10 of the current 2028 Vision states that ‘...there will be a good provision of affordable housing particularly in rural communities,’ however there is no mention of housing provision</p>	<p>We note your comments on the Vision, Area of Local Separation, housing need, areas of local separation and the housing strategy options. We also note the suggested clarifications for the Settlement Hierarchy Assessment.</p> <p>The suitability of all sites for</p>

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	<p>focused in rural areas. Therefore, this part needs to be amended to reflect the Plan's spatial aspirations. Furthermore, policies that are drafted in the new Local Plan should be drafted in a positive manner to ensure that the visions and associated objectives are met.</p> <p>2.21 'We would like to hear your views on the proposed amendments to the Areas of Local Separation and Green Wedges, the findings of the stuffy, and the influence these areas should have on development strategy.'</p> <p>Our comments are focused on PALS-3 that proposes an Area of Local Separation (AoLS) between Birstall and Rothley, by reviewing the Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation Methodology and Assessment Findings Report 2016 (informed by the Landscape Character Assessment 2012), as well as current adopted Local Policy. An Area of Local Separation does not form part of the NPPF, and is purely a planning designation at a local level. Currently, the only adopted policy in relation to this designation is TR/12 of the 2004 adopted Charnwood Local Plan which states;</p> <p>'Planning permission will not be granted for development on land along the Great Central Railway corridor where this would prejudice its operation as a railway, or its ability to provide additional transport routes and facilities in the future.'</p> <p>The adopted Core Strategy briefly mentions AoLS in policy CS11, stating that;</p> <p>'We will protect the predominantly open and undeveloped character of Areas of Local Separation unless new development clearly maintains the separation between the built-up areas of these settlements.'</p> <p>This is not restrictive in nature and we believe any future AoLS designations should reflect this. As such, PALS-3 should be reduced in order to accommodate potential future development (PSH400 site in SHELAA 2017) in Rothley up to 2036 – see Appendix 1 – Proposed amendment to PALS-3 designation.</p> <p>The reasoning supporting the amendment is as follows;</p> <ol style="list-style-type: none"> 1. The Green Wedge and AoLS Review 2016 (mentioned previously) acknowledges that the northern area of the AoLS' rurality diminishes northwards. The removed area (PSH400) proposed adjoins the zone of weakness to the north (built form of Hallfields Lane) which the Review concludes should be excluded from the AoLS – the addition of the removed area would not change the overall principles of PALS-3. Furthermore, the proposed area itself is bounded by plantation; creating a sense of enclosure. 2. The proposed area for removal is minimal when considered against PALS-3 as a whole, which the Review itself acknowledges as being 'fairly large scale' that provides a large physical gap between Rothley and Birstall. 3. The views from the PALS-3 would not be affected by the removal of the land as per Appendix 1, due 	<p>inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>to the fact that the Review finds that no more than one key settlement is in view from the centre of the PALS-3 – as well as no key views from neighbouring land. Furthermore, it is acknowledged that as there are limited restricted views from neighbouring settlements, there is room for the PALS-3 to be reduced without affecting the efficacy of the AoLS.</p> <p>2.34 ‘We would like to hear your views on the findings of the Settlement Hierarchy and Settlement Limits to Development Assessments.’</p> <p>Settlement Hierarchy Assessment We agree with the way in which each settlement has been assessed in the sense that it has used up-to-date and information. However, we find it disappointing that there is no clear identification of the ‘edge of Leicester’ which has been used subsequently in Appendix D’s Categories. Therefore, identification of specific sites/areas where for the ‘edge of Leicester’ would have been a useful addition.</p> <p>Another helpful addition within this assessment would have been clearer methodology – in section 9 – in relation to scoring of areas in relation to the services they provide. There appears to be lack of clarity – for example in Figure 10, Rothley has a score of 10, yet the total of all services equates to 20. This is the same for all other areas.</p> <p>Settlement Limits to Development Assessment Whilst we acknowledge the need to maintain the character of settlements and the role of ‘limits to development’, we disagree with the methodology employed within this assessment. The principles which form the assessment criteria are somewhat restrictive in the sense that existing and planned allocations are taken into account. It is important that when limits to development are reviewed, the Council should ensure that they are drawn to allow for the potential growth of settlements to meet local needs, as well as ensuring that the overall housing requirement is being met. As such the assessment does not consider promoted sites that could be included in the new Local Plan in order to meet (what we deem as) the preferred higher housing delivery figure of 15,700 homes. Furthermore, the Council should consider the benefits of long term certainty for local communities and development industry when reviewing settlement boundaries, through providing opportunities for development beyond 2036 or as potential contingency sites if development does not occur as expected elsewhere in the Borough.</p> <p>4.3 ‘We want to hear your views on the options, how they have been assessed and how they should combine to provide a development strategy for the Borough to cover the period to 2036.’</p> <p>Firstly, when viewing the various options proposed for growth to cover the period to 2036, we have examined them on the basis of the higher housing delivery figure of 15,700 homes. We are in favour of this figure as it increases the potential for meeting housing need, as well as maintaining a sufficient supply of land.</p>	

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	<p>Option 1 We do not believe this option is feasible as the proposed growth areas do not have enough capacity to support the higher growth scenario – of which we are in favour of. Furthermore, as expressed in the Sustainability Appraisal (SA), the benefits in relation to housing are uncertain.</p> <p>Option 2 Based on the higher growth option (2B in SA) overall for the Borough, option 2 is logical in the sense that growth is focused in the most sustainable locations that have good access to jobs, services and public transport; as well as supporting key employment locations.</p> <p>Option 3 As with option 2, it too has a logical thought process for growth using the higher growth option to 2036; with the exception of allocations within Other Settlements. By providing a dispersed approach it ensures that there is flexibility in the choice of sites – and in turn site size – in order for housing need to be met. Furthermore, unlike option 2B, this approach would provide a reduced impact on flood risk.</p> <p>Option 4 Proportionate distribution of new housing in relation to the population of each settlement hierarchy tier would not be beneficial to the Borough through B4 in the SA as it would not be sustainable as housing would be allocated in areas where the sites proposed would not be able to contribute sufficiently to the upgrading required of infrastructure. Overall the assessment found the benefits of options 2 & 3 which we support.</p> <p>Option 5 We do not support this option as it does not support the higher growth option, and benefits of such development would be minor. Furthermore, the promotion of four large sites which would need to be combined with other sites to form a development strategy for the Borough, are not as sustainable as the other options proposed, depending on new infrastructure (funding of which is not necessarily guaranteed).</p> <p>Option 6 We do not disagree with this option as a balanced mixture of different sized sites can be accommodated to ensure various needs are met – as long as the higher growth option is selected. Again, the concern is the sustainability of the new settlements and the assurance that the necessary infrastructure can be achieved.</p> <p>Option 7 We agree with the findings – in particular the fact that the housing needs will not be delivered within the plan period and potential effects are not able to be determined.</p>	

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	<p>4.9 'We also want to hear your views about the right mix of sites to facilitate delivery whilst supporting the provision of infrastructure.'</p> <p>We believe that in order to increase delivery across the whole of the Local Plan area, a wide range of sites should be provided – both in terms of size and location. It can ensure that these sites appeal to a wide cross section of the development industry and housing market, avoiding saturation effects. However, it is important that proposed growth and the right mix of sites are accommodated in areas where people choose to live/aspire to live even more so. In this sense we believe that a balance should be made of both larger and smaller sites in the Plan.</p>	
TLP/63	<p>Reference your 'Charnwood Settlement Limits Assessment' document. I refer to Rearsby only.</p> <p>Your new proposed limits to development, cuts across part of existing property boundaries. This is a undefined line that has no natural / existing boundary markers eg an existing boundary at the end of a garden. This makes it very difficult for householders and CBC to understand where development may take place.</p> <p>I suggest that you should use existing Land Registry boundaries as to the limits to development</p>	<p>We note your concerns regarding settlement limits at Rearsby. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>
TLP/64	<p>Issues of concern Traffic - congestion and plans to mitigate it</p> <p>Sense of Place and quality life. Large communities cannot work. People need to be able to relate to people they recognise or know. Therefore towns need to be made up of 'village' communities each with their own services, character and facilities.</p> <p>Areas of separation - Loughborough/Woodthorpe - but add:</p> <p>Loughborough/Woodhouse Loughborough/Woodhouse Eaves Loughborough/Outwoods Woodhouse/Woodhouse Eaves</p> <p>Definition of 'Charnwood'. What is its boundaries, key features, assets and vulnerabilities? Outwoods, for example, should be visible from Loughborough and wider areas of Leicestershire and not hidden by development. Boundaries need to consider elevation as well as footprint.</p> <p>Historic Environment The Great Central Railway is mentioned in the document and seems to be valued, however although the existing facilities are well established, being largely volunteer based development is necessarily slow but has successfully engaged local communities. Unfortunately this has meant that development opportunities have been missed. For example connections back to the centres of Leicester and</p>	<p>We note your concerns regarding traffic congestion, communities, areas of separation, heritage, services and facilities and viability. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>Nottingham are now unlikely and even the area adjacent to the station in Loughborough has been developed for housing which has restricted visitor access by removing car parking potential.</p> <p>Now connection with GCR North is being restricted by the existing engine shed which should be relocated (still close to Loughborough centre) to somewhere more appropriate such as the old Brush facilities perhaps. Planning vision is needed to develop potential in the future.</p> <p>Services and Facilities People need services and facilities locally, but they are not being provided because of developer's profit lines.</p> <p>For example a Community Centre on Highland Drive has been proposed through planning, but is very unlikely to be commercially viable. By contrast Aldi and Costa are able to develop on Ling Road with no concern for major housing development close by which has no community facilities.</p> <p>If Loughborough is to be our 'Main Urban Centre' why can we not get there except by car? And why are facilities there so limited? With the academic centre of Loughborough university so important to the plan where is the 'cafe culture' and high-class facilities that might be expected to attract the intelligent staff and students of a successful institution?</p> <p>Proposal Categories These are all well and good but too simplistic. An Urban Centre cannot provide all Service Centre services to all its residents because many will be too remote. What services are needed for easy daily access on foot, regular access via some form of travel (perhaps cycle), and less frequent access by more distant travel perhaps by car?</p> <p>For example milk and papers may be needed by less than a 10 minute walk, Doctors, chemist and a community meeting point perhaps a 15 minute walk and a food shop. entertainment and religious centre may need a short bus ride whereas a weekly shop may need a car ride (or delivery).</p> <p>Schools Given the National Curriculum why is the local school not best?</p> <p>Why were local schools closed and busses introduced to 'centres'?</p> <p>Given more recent cooperation between schools why can't 'outposts' be built so that schools can locate near to population rather children being 'bussed' to big schools where their identity and sense of community is lost. Imagine the reduction in bus and car travel if schools were local again! This would reduce peak time travel, parking and congestion. If travel costs and parent time were to be factored into finances I am sure the priorities would change. People incurring these costs are the very tax payers who</p>	

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	<p>pay development costs anyway!</p> <p>Health Care These same arguments apply to health care, Care homes and other services. If new areas of housing are to be built then services must be brought to them not vice versa.</p> <p>There seems to be a policy to build new facilities on existing sites as this should be more efficient. However, the commissioning groups' role is to provide support to the local communities. It is not the role of the communities to support the commissioning groups whilst some specialist services will not have the demand to justify a distributed service and therefore need to be located centrally, many services are sufficiently generalised to justify being offered on a distributed basis. Doctors and support staff can move to centres on a daily basis removing the need for local people to travel and the admin and management can be provided centrally since people do not need to visit them.</p> <p>Affordability to Developers Developers build houses, but somehow they become homes. If the developers cannot afford to provide the 'development support', then it will fall to the local government or other organisations to supply them. If they in turn cannot afford them then the community itself becomes unviable. Facts need to be faced at the beginning. Perhaps the Community Centre on Highland way is an example of this - yes the centre was planned, but the community is really in no position to make a success of it (if for no other reason than that a community does not yet exist) so it may well revert to a further profit opportunity for the developer.</p> <p>Appendices In Appendix B it would help to show : Major routes The GCR Redeveloped The location boundary of Charnwood conservation, The National Forest and the Parkland Appendix C The image is too small and therefore not legible.</p>	
TLP/65	<p>I would be grateful if my comments are recorded within this consultation.</p> <p>May I bring to your attention my concern about the Parish of Newtown Linford being placed in the 'Other Settlements' within the hierarchy. At this time the two hourly bus service that runs between Leicester and Coalville, through the village is out to consultation by Leicestershire County Council. I believe this is at risk, therefore if this ceases to operate or is reduced, It will have an impact on the sustainability of the village. The impact being that residents will have much less potential to access services by public transport. I also note, there is now limited access to services such as a convenience shop in the centre of the village. Subject to the outcome of the County Council consultation I believe there is a case to place Newtown Linford within the 'Small Villages' category.</p>	<p>We note your concerns regarding Newtown Linford's position in the settlement hierarchy. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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<p>TLP/66 Geoffrey Prince Associates Ltd on behalf of obo Cawrey Ltd</p>	<p>These representations are submitted by Geoffrey Prince Associates Ltd on behalf of Cawrey Ltd, a local family run house-building company which has been building high quality, sustainable homes in the Leicester area for over 50 years.</p> <p>Chapter 1 Introduction No comments</p> <p>Chapter 2 Context for preparing a development strategy for Charnwood No comments</p> <p>Chapter 3 How much development is needed? We consider that the HEDNA provides a reasonable assessment of the objectively assessed housing needs (OAHN) for Charnwood for the period 2011-2036. However we consider that the OAHN will need to be updated at regular intervals to take into account changing circumstances relating to migration trends, economic activity, commuting patterns, birth rates, life expectancy, and changes in household size.</p> <p>We consider that the net requirement for sites of 6,451 additional dwelling units after taking into account completions to date and commitments is a minimum net additional requirement for the same reasons as set out in para 3.6 (ie that not all sites with planning permission and commitments will come forward or not achieve their target capacities). To provide flexibility we therefore propose that the net additional requirement be increased by at least 10% of the total net requirement for 2011 – 2036 (ie 10% of 6,451 = 645).</p> <p>We also consider that Charnwood will need to make an additional provision to meet a proportion of the unmet housing requirements of Leicester City. The OAHN for Leicester City has been estimated at 41,700 (2011-2036), but that it only has a theoretical capacity only 26,230 homes (including completions to date and commitments), thus leaving a shortfall 15,470 homes. This shortfall could be considerably higher if not all commitments are delivered by 2036 and the theoretical capacity of Leicester City proves to be over optimistic. To allow for this shortfall in supply we therefore propose that a 10% flexibility allowance be added to the shortfall making a total unmet requirement of 17,017 (ie 15,470 + 1,547). Thus, provision will need to be made in the Districts adjoining Leicester City to meet an unmet requirement totalling 17,000 (rounded). We consider that somewhere between 20% and 40% of this requirement will need to be met in Charnwood. If we assume 30% , then the overall housing requirement for Charnwood will need to be increased by 5,100 (rounded).</p> <p>Table 1 below summarises our adjusted estimate of Charnwood's overall housing requirements including the unmet need from Leicester City. Overall total requirement is for sites for 30,600 new homes to be provided between 2011 and 2036. Of these sites for 12,200 net additional new homes need to be found through the Local Plan process.</p>	<p>Sustainability Appraisal We note your concerns about the presentation and robustness of the Sustainability Appraisal report.</p> <p>The responses received to this consultation will be considered and used to inform the preparation of the next sustainability appraisal report which will accompany the Draft Local.</p> <p>We note your comments regarding housing need, green wedges, settlement limits, sustainability appraisal, housing strategy options and sites. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p> <p>The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>The Council will continue to work with the other Leicester and Leicestershire Housing Market Area authorities under the duty to cooperate.</p>

Table 1 Estimates of Charnwood’s Overall Housing Requirements 2011-2036

	Dwelling Requirement
Charnwood OAHN 2011-2036	24,850
Completions and Commitments to date	18,400
Net Requirement	6,450
10% Flexibility Allowance	650
Charnwood Net Additional Housing Requirement 2011-2036	7,100
Unmet Housing Needs from Leicester City	5,100
Total Additional Requirement 2011-2036	12,200

Chapter 4 What are the reasonable development strategy options?

Broad Locations for Housing Development

- Option 1 Leicester and Loughborough Urban Areas
We do **not** support this option.
 - This option will result in an over-concentration of new homes around the main urban areas and undermine the sustainability of the Service Centres and other smaller settlements.
 - This option would not provide sufficient choice of locations for new homes and where people choose to live.
 - This option will require large sites capable of accommodating several thousand houses each (like the SUEs at NE Thurmaston, West of Loughborough and North of Birstall). Given the environmental constraints around these urban areas, there are likely to be significant land supply issues and thus there is a high risk that this option will not be delivered within the plan period.
 - Under this option Charnwood would have difficulty maintaining a 5 year housing land supply due to delays in bringing forward large schemes. This will result in unplanned development on appeal at other locations throughout the Borough.
- Option 2 Leicester and Loughborough Urban Areas and Service Centres
We **support** this option.
 - This option will enable the Service Centres (6 identified in Table 3) to be properly planned for rather than being subject to unplanned development.
 - To counter-balance technological and other challenges facing the retail sector this option will also enable the town centres of the Service Centres to be enhanced and made more attractive and viable, as well a supporting other local services;
 - New housing can be provided within walking/cycling distance of most local services, thus reducing pressure on the use of motorised modes of transport;
 - There are a large number of small-medium sized sites around these settlements which are deliverable and viable, and which can avoid areas of environmental importance.

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	<ul style="list-style-type: none"> - Overall this option represents a much lower risk option to Option 1 with identified local benefits. ▪ Option 3 Settlement Hierarchy Distribution We also support this option. <ul style="list-style-type: none"> - We support this option for the same reasons as we support 2, except that the benefits will be shared by a greater number of settlements. This will ensure the sustainability and rejuvenate the populations of these other settlements (14 identified in Table 3), where the populations will continue to age and some local primary schools and other local services will be threatened with closure without some growth and development. - The other settlements have the capacity to absorb some additional development without it having a negative impact on the environment. ▪ Option 4 Proportionate Distribution. We do not support this option. <ul style="list-style-type: none"> - This option will lead to too dispersed pattern of development which is likely to result in longer commuting distances and the use of motorised forms of transport to reach local services found in the larger settlements and service centres. ▪ Option 5 Leicester and Loughborough Urban Area and New Settlements We do not support this option. <ul style="list-style-type: none"> - New settlements require long lead in times and it is likely that under this option Charnwood would have difficulty in maintaining a 5 year housing land supply which will result in unplanned development on appeal at other locations throughout the Borough. - This option will require several large sites capable of accommodating several thousand houses each (like the SUEs at NE Thurmaston, West of Loughborough and North of Birstall). Given the environmental constraints around the urban areas and elsewhere in the District in identifying locations for free-standing settlements, there are likely to be significant land supply issues - High upfront infrastructure and land acquisition costs will be incurred in developing new settlements and thus there is a high risk that this option will not be delivered within the plan period. - The long term sustainability of the Service Centres and Other Settlements would be undermined with this option. ▪ Option 6 Leicester and Loughborough Urban Areas and Service Centres and new Settlements We do not support this option for similar reasons given for opposing Option 5. ▪ Option 7 New Settlements We do not support this option for similar reasons given for not supporting Options 5 and 6. <p>Chapter 5 Sites that are available My client, Cawrey Ltd, is promoting land west of Gorse Hill, Anstey (SHLAA Ref PSH2). The site area is approximately 4.5 ha, and it has a net capacity for around 90 dwellings. It is bounded by the A46, Anstey Lane and Gorse Hill. The SHLAA concluded that the site is a suitable location for development,</p>	

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	<p>noting:</p> <p>‘Suitable location for development in terms of its walkable connectivity to Anstey and Beaumont Leys. There are no known irresolvable physical/environmental constraints preventing development, the site is in a suitable location for development adjacent to a service centre and a suitable access can be achieved.’</p> <p>With regards to achievability the SHLAA stated: <i>‘It is essential that the applicant provides clear evidence that the site is also achievable against the criteria set out in the SHLAA document. This will establish whether the site has a reasonable prospect of being delivered.’</i></p> <p>On behalf of my client I can now confirm that [REDACTED] [REDACTED] the site is achievable and deliverable in the short term.</p> <p>Although the site currently forms part of a Green Wedge we note that the recent Green Wedge and Areas of Local Separation Review has recommended that this site be removed from the Green Wedge as it does not meet the overall purpose of the Green Wedge and represents an area of weakness. Specifically it states:</p> <p><i>‘The area bounded by Anstey Lane, Gorse Hill and the A46 is physically isolated from the wider GW-1(A) area and the boundary should be aligned with defensible highway features’</i></p> <p>My client has commissioned his own Landscape and Visual Impact Assessment which endorses this recommendation. In its conclusions and recommendations this report states:</p> <ul style="list-style-type: none"> ▪ Impact on Landscape Character: The site abuts an existing residential area and the development of part of the site for residential use would be entirely in keeping with the landscape character of the surrounding area which is described as being influenced by urban fringe elements with impact from large urban settlements. However, due to the confined nature of the site and the visual screening of the site from all directions the development proposals would not further detrimentally impact local landscape character. In addition, the creation of a pedestrian link through an area of open space provides an opportunity to create a biologically diverse landscape, diversifying and enhancing the character of the local landscape over the current open grass field. ▪ Impact on Visual Amenity: Following a detailed survey and appraisal of the surrounding area it is considered that the development of the site for residential use would not adversely affect the visual amenity of the local area. The site is visually well contained from all near and middle distance viewpoints due to the presence of mature boundary vegetation that will be retained as part of the development proposals. Any potential longer distance views of the development will appear as a natural extension of the urban form and will be consistent with the existing landscape 	

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	<p>character. These views will also be comparatively distant compared to other parts of the urban area.</p> <ul style="list-style-type: none"> ▪ Impact on Green Wedge: The Core Strategy Policy CS12 identifies Green Wedges as performing a number of important functions, including acting as green lungs for our urban areas, providing areas for recreation and protecting individual identity for some settlements by safeguarding them from merging together. The existing site at present fails or is limited in its ability to provide any of the above functions proscribed to Green Wedge. The site provides little additional value in terms of separating the greater Leicester urban area from Anstey, as this is achieved in most part by the restriction of the A46 Leicester Western Bypass and more significantly the landscape valley and flood plain of Rothley Brook, which has far more significance in both landscape and visual impact terms due to its attractiveness, visibility and public accessibility. <p>Chapter 6 What happens next No comment.</p> <p>Appendices A-E No comments</p> <p>Evidence Base Documents Interim Sustainability Appraisal As usual the SA is confusing, difficult to comprehend and difficult to allow comparison of options as it involves an assessment of a myriad of factors based on limited information and often based on subjective views.</p> <p>At the end of the day a common sense approach resulting in a balanced approach to new housing and employment development which is viable and deliverable within the timescales will prevail and which avoids locations with potential 'red cards' such as significant environmental, heritage and flood risk constraints.</p> <p>Settlement Hierarchy Assessment We broadly agree with the findings of this assessment, and have no further comments.</p> <p>Settlement Limits to Development Assessment In determining the proposed limits to development these limits should take into account the recommendations of the Green Wedge and Areas of Local Separation Review.</p> <p>For example at Anstey the area bounded by Anstey Lane, Gorse Hill and the A46 which is physically isolated from the wider GW-1(A) area should be aligned with defensible highway features and this area included within the proposed development limits of Anstey (refer also comments on Chapter 5 of</p>	

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	<p>Towards a Local Plan for Charnwood).</p> <p>Green Wedge and Areas of Local Separation Review We broadly concur with the methodology used in the Green Wedge and Areas of Local Separation Review, and the recommendations of this Review.</p> <p>Specifically we agree with the recommendation to remove the area of land bounded by Anstey Lane, Gorse Hill and the A46 from the Green Wedge as it provides little additional value in terms of separating the greater Leicester urban area from Anstey, as this is achieved in most part by the restriction of the A46 Leicester Western Bypass and more significantly the landscape valley and flood plain of Rothley Brook, which has far more significance in both landscape and visual impact terms due to its attractiveness, visibility and public accessibility.</p>	
<p>TLP/67 Woodbrook Vale School (Governor)</p>	<p>We've been looking at the recent Local Plan Consultation and have some concerns we wish to flag to you about its impact on Woodbrook Vale School (WBV).</p> <p>The stated purpose of the Settlement Limits is to "define the extent of the cohesive built form of a settlement. The reason for defining Settlement Limits is to give some clarity and certainty to areas and prevent unnecessary encroachment into the countryside". (Email from Clare Clarke, Principal Planning Officer, Charnwood Borough Council 24/5/2018). There does not seem to be a stated purpose to protect school playing fields (which already have significant legislative protection above and beyond the normal need for planning permission).</p> <p>Clare Clarke in her email goes on to say, "The proposed limits we are consulting on have been assessed using a clear methodology which is intended to be objective and transparent. The assessment methodology explains that the boundary will tightly define the settlement by enclosing the established, cohesive built form and include Community Buildings which are adjacent to the main built form of the settlement such as schools but exclude playing fields or other open spaces and outlying or isolated buildings or structures."</p> <p>We support the stated purpose of the Settlement Limits but we believe the assessment methodology chosen (while objective, transparent and straightforward to implement) is unnecessarily stringent in this case, goes beyond what is necessary to achieve the stated purpose, and will restrict (perhaps unintentionally) Woodbrook Vale School's ability to add buildings (classrooms, science labs...) beyond the footprint of our current buildings. Such development would not "encroach into the countryside" under a reasonable understanding of the phrase. It seems to us that the real boundaries of the "countryside" are actually those along the boundaries of Woodbrook Vale School stretching from the new Beck Crescent development to the west and the houses on Rosewood Way to the south.</p> <p>Our preferred "Settlement Limit" is therefore a line from the Beck Crescent development to our west, along our boundary, to the nearest house on Rosewood Way to the south of WBV.</p>	<p>We note your concerns regarding settlement limits and school expansion. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>Whilst we have no specific plans to do so at the moment WBV governors would be very reluctant for WBV to be denied the opportunity to expand should we wish to at some future time or to improve our current facilities. We currently have c. 800 students (and buildings to match this number but not expand it) but this September we are heavily oversubscribed by a significant degree (with resulting large numbers of extremely disappointed local children and parents). With continued housing development within our catchment we can't see how this demand won't continue, and indeed the pressure for more secondary school places locally will surely increase over the next few years. We wish to serve our community and provide an outstanding education for the children in our local community as defined by our catchment area.</p> <p>We would in reality be very happy with any plan that prevented us from selling off playing fields / building houses etc around the edges of our playing fields but yet allowed us to build classrooms / improve facilities nearer to our current buildings if we needed them (and we would anyway need to go through the normal planning process for this). Governors and staff at WBV have no desire to build on our playing fields, nor to see Loughborough expanding beyond its current limits to our west and south.</p>	
TLP/68	<p>Thank you for your letter dated April 18 inviting views on the issues that will influence how new homes are planned for as part of the new Charnwood Local Plan to 2036.</p> <p>I understand the need for new homes and the challenges this raise, however my concerns are with any future housing development in Shepshed. Most of the options suggest that the remainder of any unfulfilled development will be focussed in the Loughborough Urban Area which includes Shepshed.</p> <p>Shepshed is unable to cope with such a big increase in population, particularly in terms of traffic, landscapes and flood risk. The town has poor roads and narrow pavements to the centre of the town. It will require improved roads, new schools and health facilities to support any new developments.</p> <p>In particular I am most concerned with any future housing development around Ticklow Lane, Shepshed.</p> <p>Ticklow Lane is a narrow winding country lane, difficult to navigate safely. The junctions at both ends can be dangerous. In addition at times, there are surface water problems along the lane due to debris and silt build up.</p> <p>Currently local builders Jelson and William Davis have put forward planning applications to build a further 860 new houses that will have access directly onto Tickow Lane. We are yet to experience what additional congestion, delays and highway issues these developments will cause.</p> <p>As construction is taking place to the already permitted housing applications along Tickow Lane, there has been a significant increase to the number of HGVs and other commercial vehicles travelling back and forth from the A512 along Tickow Lane to access and exit the building sites.</p>	<p>We note your concerns with development at Shepshed especially in relation to flood risk and transport issues. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>These vehicles all pass over a narrow railway bridge with a weight limit restriction of 7.5 tonne as they rightfully have access if delivering to construction sites in the area. There is no speed limit restriction in place except the national speed limit. At present no serious accidents have occurred, but time will tell.</p> <p>Almost all traffic from these additional 860 proposed new homes will use the A512, entering and exiting from 3 junctions- Tickow Lane, Charnwood Road and Leicester Road. This will increase traffic on an already congested road. Both Charnwood and Leicester roads have street parking making it difficult to navigate in places.</p> <p>In addition to this, an interest has been logged for a further large development - Ref PSH291 Phase 2. This is land on the south west side edging Tickow Lane and bordering the Black Brook river.</p> <p>If this proposal is passed the site would adversely affect local highway safety and give rise to a road safety hazard. It may also require a flood risk assessment as the land may be affected by flooding from the Black Brook Reservoir.</p> <p>The reservoir has a high risk to flooding. Although it is recognised that whilst the chance of reservoir failure is remote, the consequences are potentially catastrophic and could affect areas several kilometres from the dam itself. Some flood risks are high along the Black Brook river and the maximum extent of flooding extends over a large area of this site (PSH291) extending over Tickow Lane in part. The dam at Black Brook Reservoir is known to overflow.</p> <p>You stated that understanding flood risk is important but if site PSH291 is given permission to build on, these plains could flood. This means any drains on the site for example will become inoperable. Drains and sewers will be washed out onto the surrounding streets. Houses could flood and toilets will not flush. Any buildings in the way of a burst reservoir will act as an obstruction forcing water up to the roads. The earth will continually be waterlogged. Even low levels of flooding can pose a risk to people in situ, because there may be the presence of contaminants in floodwater, or the risk that people may require medical attention.</p> <p>Consideration will need to be given to fire and rescue and police and ambulance services in the town.</p> <p>County council resources are already stretched and this raises further concerns for the future vision for looking after Shepshed's green spaces.</p> <p>It was also mentioned there should be relationship between development and the environment. However there will be a major adverse impact on the environment along Tickow Lane with the current proposals, not taking into consideration any further planned developments. This will affect air quality. Landscape west of Tickow Lane would be ruined and there will be a further impact to existing wildlife.</p>	

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TLP/69	<p>Charnwood's vision is for enjoyment of a cleaner and greener environment, but if the planned proposals go ahead Shepshed would not be one of the most desirable places to live in.</p> <p>In the past myself and other parishioners of Wanlip have written in response to consultation processes on various planning related subjects. Rather than abstract specific arguments from these documents I have copied them for your information as the views expressed in them are largely relevant to your current consultation.</p> <p>The papers enclosed are as follows:</p> <ol style="list-style-type: none"> 1) Wanlip village considerations, 11 June 2013. 2) Charnwood Local Plan 2006-2028 Site Allocations and Development Management Policies, March 2014. 3) Letter to Sarah Driscoll, Charnwood Local Plan 2006 to 2028 Core Strategy. 4) Overview of Charnwood B C's Green Space Planning Policy <p>I have not highlighted any particular comments in these documents because together they represent how strongly the residents of Wanlip feel and the number of sound reasons why development round the village should not be permitted.</p> <p>Furthermore, I wish to make a more radical point concerning Areas of Separation as they are the key to maintaining Wanlip village as a separate entity. I would like to suggest that with respect to villages like Wanlip that are close to urban areas, Charnwood should have a positive policy which prevents any form of built development taking place within the areas of separation.</p> <p>In todays economic environment it is all too easy for landowners to offer their land for development without having first considered other uses. I am convinced that, with imagination, uses for the land that are consistent with green areas can be found, although of course not as lucrative to the landowner.</p> <p>The land round Wanlip is currently either in pasture to support rare breed cattle and pasture for hay. The rest is rotated for arable purposes, which one assumes are financially worthwhile.</p> <p>I would make the following suggestions to the acceptable use list within areas of separation:</p> <ol style="list-style-type: none"> 1) To meet policies like the National Forest, planted with trees but accessible to the public. This use would presumably need subsidy from the government. 2) Orchards, with the produce being offered on an arrangement with local grocers on the basis that they do the picking or available to the public on a self-pick basis. 3) Recreational purposes. There is currently a planning consent application by the Cedars school to extend its physical activity provision. Also, there could, in the future, be sports pitch needs related to Birstall. 4) Whilst the Country Park is defined by the previous mineral workings and flood plain, it is not 	<p>We note your concerns regarding areas of separation and appropriate land uses, urban sprawl and green space. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>inconceivable that some of the land could be needed to extend the park as it is developed in the future. For example, the flood plain land being managed by the Wildlife Trust has had Dartmoor ponies on it.</p> <p>I appreciate that not all of these uses would stack up financially for current owners but things can often be made to work by either selling on or moving forward by developing new skills by tapping into specialist advice and finance.</p> <p>It is my view that if Charnwood does not have a mandatory policy to prevent built development on the land surrounding Wanlip then it will not be long before it is swallowed up by developers who are insensitive to the value of safeguarding our historic villages.</p> <p>Further documents/information submitted with representation ref: TLP/69</p>	
<p>TLP/70 Cossington Parish Council</p>	<p>The Parish Councils of the Soar Valley Liaison Group trust that the following concerns are considered:</p> <ul style="list-style-type: none"> -Development without sufficient infrastructure, mainly road capacity - Impact on existing services including shops, medical facilities, recreation and education - Lack of car parking within settlements - Public transport - Possible loss of separation between settlements and green wedges - Quality of development, should be imaginative and well designed - Affordable and social housing 	<p>We note your comments and concerns regarding infrastructure, services and facilities, car parking, public transport, areas of separation, design and affordable housing. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>
<p>TLP/71 Theatre Trust</p>	<p>The Trust makes no comment on the provision of homes and jobs in Charnwood, nor whether there are other reasonable alternatives to accommodate such needs.</p> <p>We are keen though that the emphasis on supporting Loughborough as the borough's cultural heart remains within the vision, and that the plan provides adequate protection for the borough's theatres and other arts, community and cultural facilities. We recommend that saved policies CF/1 and CF/2 are retained within the new Local Plan with some revisions. This would include broadening the explicit remit of the policy to include cultural uses for alignment with the NPPF, and revising the wording to ensure that need is considered alongside viability rather than judging applications on one or the other. Within that we would also recommend that evidence of robust marketing effort is required over a period of at least twelve months, at a sale or rental value appropriate to the facility's existing use and condition. This is to ensure that facilities are genuinely redundant and to limit scope for applicants to undermine facilities and manipulate unviability.</p> <p>The Trust has expertise in drafting policies relating to cultural and community facilities and would gladly assist the Council should it be required. We otherwise look forward to further engagement on the new</p>	<p>We note your comments and offer of assistance regarding cultural and community facilities and the need for policies. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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TLP/72 Forestry Commission	<p>Local Plan as it is developed.</p> <p>The Forestry Commission is a non-statutory consultee on developments in or within 500m of ancient woodland. Ancient woodland is an irreplaceable habitat. National Planning Policy Framework paragraph 118 states:</p> <p>‘planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss’</p> <p>We do not have the capacity to examine all the proposed development sites within the plans for impact on Ancient Woodland. We would however expect that you will have done your own assessments and that that assessment criteria would have eliminated such proposals early on in the process and if not would point you towards the joint standing advice prepared with Natural England on ancient woodland and veteran trees. This standing advice has been updated recently to clarify certain elements and it should be taken into account by planning authorities where relevant when determining planning applications and by developers preparing plans. On the same page there are links to Natural England’s Ancient Woodland Inventory, assessment guides and other tools to assist you in assessing potential impacts.</p> <p>In the majority of cases this will provide the advice you need to help you make your decision about a development proposal or any master planning.</p>	<p>We note your comments regarding Ancient Woodland. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be accompanied by an appropriate range of evidence, and supporting documents.</p>
TLP/73 Woodbrook Vale School (Headteacher)	<p>I am writing to you as Headteacher of Woodbrook Vale School, Loughborough.</p> <p>The potential long term impact of your recent Local Plan Consultation on Woodbrook Vale School has raised significant and, in our view, justifiable concerns. I write to you at this juncture to highlight our anxieties and to request further discussion to clarify a number of points contained within the Local Plan.</p> <p>We agree with your stated reason for defining the Settlement Limits and certainly have no desire or intention to encroach unnecessarily into the countryside. We are also fully committed to protecting our school playing fields and as a former Physical Education specialist, I feel particularly strongly that fields should never be sold off for commercial or other purposes.</p> <p>Your assessment methodology explains that the proposed boundary tightly defines the settlement by enclosing established buildings (the “cohesive built form” of the settlement). Playing fields and other open spaces are however excluded from this boundary definition. As an established and popular secondary school which has generated significant waiting lists for school places over many years, we find this tight definition restrictive and potentially problematic in the future.</p> <p>We are extremely committed to serving our community to the best of our ability. As you may be aware,</p>	<p>We note your concerns regarding settlement limits and school expansion. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>we are a very popular school both within and beyond our catchment area. Demand for places at Woodbrook Vale is anticipated to grow considerably, both from factors related to parental/student choice and also from the additional planned housing development in the local area. Although we have no immediate plans to expand, this projected increased demand may present a future need to add additional classrooms beyond the footprint of our current buildings. Additional building of this nature would not be in conflict with your key reason for defining Settlement Limits.</p> <p>We do not believe that a decision to restrict potential future building on the Woodbrook Vale site or to improve existing buildings would be in the best interests of our local community. A decision such as this would be particularly detrimental to the young people we have so successfully served over many years.</p> <p>We look forward to you responding to our concerns in the near future.</p>	
<p>TLP/74 East Midlands Airport</p>	<p>Thank you for consulting East Midlands Airport on the discussion paper that is part of the process to prepare a new Local Plan for the Borough. We have some observations and comments that we hope are helpful at this stage of the plan-making process.</p> <p>East Midlands Airport is a significant UK airport and in 2017 handled some 4.8 million passengers. It is also a nationally important cargo airport (second only to London Heathrow) handling 350,000 tonnes of cargo in 2017. East Midlands is the UK base for global express freight carriers DHL and UPS who rely on its available airport capacity, the central local and direct access to the Strategic Road Network. Both DHL and UPS are making significant investments in new facilities at the Airport.</p> <p>The Airport site and the immediate East Midlands Enterprise Gateway area is an important national and regional economic and employment asset. Recent studies have estimated that the Airport generates some £440m of regional direct, indirect and induced GVA and in 2017 there were 7,954 people working on the Airport site. The Airport is a significant employer for Charnwood residents. The 2017 survey showed that 572 on-site employees live in the Borough, many living in Shepshed and Loughborough.</p> <p>The Airport provides important international connectivity for passengers and cargo, it generates significant economic value and it is a major employer both regionally and locally. The Airport is forecast to grow and this growth and opportunity should be reflected in local planning, economic and transport policy. The Airport is also an important enabler of economic growth and contributes to the economic attractiveness of Charnwood, particularly the knowledge and technology cluster in Loughborough.</p> <p>The opportunities for growth and development are set out in the Airport's Sustainable Development Plan (2015). The overall aim is to deepen the role that the Airport plays in the East Midlands by driving growth through better connectivity; creating jobs; attracting investment; and widening the range of services and destinations that are operated by the passenger and cargo airlines.</p>	<p>We note your comments regarding East Midlands Airport, its economic importance, transport connectivity and concerns about safeguarding. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>The Sustainable Development Plan sets out the ambition and capability to grow to handle 10 million passengers a year and 1 million tonnes of cargo over the period up to 2035 - 2040. Its development will also reinforce and further strengthen the Airport and the surrounding area as an economic powerhouse for the whole East Midlands region. Government are in the process of reviewing national aviation policy (Beyond the horizon. The future of UK aviation. DfT July 2017). This 'call for evidence' recognises that aviation has a key role in helping to build a global Britain with a strong and internationally connected economy. It shows that there is an increasing demand for air transport services and it also seeks to ensure that the best use is made of existing airport capacity.</p> <p>Local and regional transport links to the Airport and surrounding communities are important in terms of passenger access, for the distribution of cargo and to access on-site employment. Skylink bus connections currently provide links to Shepshed and Loughborough, but there is an opportunity to strengthen the connectivity to the local area, including improved rail services and facilities at East Midlands Parkway.</p> <p>East Midlands Airport is an officially safeguarded under the requirements of ODPM Circular 1 /2003. The objective of this Circular is to protect the safe operation of the airport and its surrounding airspace from developments that may compromise aircraft and passenger safety. The safeguarded area is shown on the safeguarding map that is issued to local authorities and this defines the areas and the types of development for which the Airport is a statutory consultee. Consultation with the Airport is required for development proposals that are; a) buildings, structures, erections and works that exceed the heights specified on the safeguarding map; b) any proposed development that may have the potential to interfere with the operation of navigational aids, radio aids and telecommunication systems; c) lighting or large-scale solar arrays that may have the potential to distract pilots particularly in the immediate vicinity and beneath aircraft departure and arrival routes; d) proposals for any aviation use within 13km of the Airport; e) any proposal within a 13km circle centred on East Midlands Airport that has the potential to attract large numbers of birds - such proposals include significant areas of landscaping or tree planting, minerals extraction or quarrying, waste disposal or management, reservoirs or significant waterbodies, land restoration schemes, sewage works, nature reserves or bird sanctuaries; f) any proposals for any wind turbines within a 30km circle that is centred on East Midlands Airport.</p> <p>Much of Charnwood is within the Airport safeguarded area, and some of the particularly sensitive areas include parts of Charnwood Forest. It is therefore appropriate that the aerodrome safeguarding requirements for East Midlands Airport are included as a Local Plan policy. This policy could be; 'within the safeguarded areas shown on the Policy Map, new development which would adversely affect the operational integrity of East Midlands Airport, aircraft operations or radar and navigation systems will not be permitted.'</p> <p>Thank you again for consulting us. We trust that these comments are helpful at this stage of the Local</p>	

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<p>TLP/75 Hoton Parish Council</p>	<p>Plan process, but should you require any additional information or wish to discuss the Airport's aerodrome safeguarding requirements, then please contact me directly.</p> <p>Hoton Parish Council would like to make the following comments on the Charnwood Local Plan Consultation Towards a Local Plan for Charnwood:</p> <p>Hoton Parish Council does not support option four of the 'Housing Strategy Options'; proportionate distribution is not a strategic way to plan development - it would create housing without the provision of infrastructure. In addition, Hoton Parish Council support the retention of the hamlets, which proportionate distribution would not deliver.</p>	<p>We note your concerns regarding the housing strategy. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>
<p>TLP/76</p>	<p>As residents of Thurmaston we are worried about the effect your future plans will have on the next generations living here and in our surrounding villages who will face, the loss of our rural amenity, the tragic loss of our precious farmland and the increased traffic congestion on our local 'Lanes' and Roads as well as added pressure on local schools and services.</p> <p>We are already facing the existing huge plans to build 4500 houses on the east of our village, add to this the extra houses being built in Queniborough with applications in for even more in our area and now your new local plan showing : PSH 69 (land east of Syston 1200 houses) PSH 189 (Land off Barkby Thorpe Lane 224 houses) PSH294 (Land south of Barkby lane 105 houses) PSH 57 (Part of the SUE 225 houses) PSH314 (Land off Barkby Thorpe Lane 150 houses) PSH 360 (100 Colby Drive 8 houses) SH162 (Rear of 36-46 Colby road 11 houses) SH156 (Humberstone lane 92 houses) SH166 (Warehouse premises Humberstone road 18 houses) over 2000 more!</p> <p>We who fought against the SUE from the start thought that the planners would reject any further large applications in this area due to the fact that our local lanes that are already heavily congested would become gridlocked.</p> <p>Add to all this the Horrific plan to build the A46 express way a four lane monstrosity cutting its way through our beautiful and productive farmland, starting from the Hobby Horse island in Syston running close to Barkby, Beeby, and Keyham on its way to the new M1 junction, added to this is a plan to build 40000 more homes along its route! How do the planners know what is going to happen between now and 2050?</p> <p>Where are all these people in these new houses going to work? Leicestershire has lost all of its manufacturing industries that employed thousands of workers :- The huge Textile industry, the Textile machine manufacturers, The shoe industry and The shoe machinery manufactures and many others. Now we seem to have just large warehouses and service jobs, Even today we read that there are over 9000 people on job seekers allowance.</p> <p>So we ask the Councils and their Planners to think again before our "Green and Pleasant" land, the</p>	<p>We note your concerns regarding future development, traffic congestion, the loss of farmland and the lack of jobs. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>damage to our village communities, the congestion of our roads and lanes, the destruction of our of our farmland together with the loss of Farmers and their workers, is decided on a guess in a fast changing future.</p>	
<p>TLP/77 Highways England</p>	<p>Highways England welcomes the opportunity to comment on Charnwood Borough Council's "Towards a Local Plan for Charnwood Discussion Paper" for the Charnwood Local Plan to 2036. We understand that the purpose of the discussion paper is to explore the scale of development needed in the borough, the key issues and opportunities that need to be taken into account and consider the overall strategy for delivering the growth needed.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the new Charnwood Local Plan, our principal interest is safeguarding the operation of the A46 and M1 which route through the Plan area.</p> <p>We understand that the Charnwood Core Strategy was adopted in November 2015 and provides a development strategy to 2028. However the new Local Plan will cover the period up to 2036 taking into account the Leicester and Leicestershire Strategic Growth Plan and new evidence on the needs for homes and jobs.</p> <p>We note that some progress has been made since our last consultation on the preparatory work for the new Local Plan, namely the Infrastructure Assessment in January 2017. We understand that the new Plan is expected to make provision for 24,850 dwellings and 76ha of employment land with the allocations being informed by the Leicester and Leicestershire Housing and Economic Development Needs Assessment (2017) and Charnwood Employment Land Review (2018).</p> <p>Based on latest figures, there remains a requirement to find sites for 6,451 dwellings. However, there is an over allocation of employment land by 3.46ha. With regard to housing we understand that this is made up of completions between 2011 and 2017 (4,259 dwellings), planning permissions as of 31 March 2017 (9,280 dwellings) and the Adopted 2015 Core Strategy Allocations (4,860 dwellings). However, not all of the housing sites allocated in the Adopted Core Strategy and with planning permission will be built by 2036 and, therefore, land for a minimum of 8,100 homes will need to be identified to meet the needs within the extended plan period. In respect of employment completions between 2011 and 2017, these account for 7.95ha, planning permissions as of 31 March 2017 account for 12.21ha and the Adopted 2015 Core Strategy Allocations account for 58.30ha.</p> <p>We note that seven development strategy options for the distribution of growth across the Borough are set out and we consider that all of the options plan for a significant amount of development growth to the north and north-west of Leicester (including Birstall, Thurmaston, Syston and Anstey) and in the</p>	<p>We note your comments on housing and employment requirements, development options, the strategic road network and transport impacts and welcome on-going engagement with Highways England. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>Loughborough and Shepshed areas. This is further supported by the capacity for housing development by the proposed settlement hierarchy as set out in Appendix D. Here we can see that housing capacities in Loughborough (5,509 dwellings), Shepshed (2,765 dwellings), Syston (1,055 dwellings), Sileby (1,145 dwellings) and Anstey (952 dwellings) are particularly high. New settlement allocations are also high and, cumulatively with proposed growth previously mentioned and across the wider borough, we consider that there could be implications for the operation of the A46 and the M1, specifically between M1 J21A and J24 and the A46 Hobby Horse junction.</p> <p>As previously commented, in January 2017, we are aware of a number of road improvements that are planned for the area. These include improvements to the A46/A5630 Anstey Lane junction to mitigate the impacts of the Ashton Green development site in north west Leicester and improvements to M1 J23 / A512 to support future developments at the University of Loughborough and Shepshed. These two schemes were granted funding through the Highways England Growth and Housing Fund (GHF) in 2017. The M1 is also being upgraded to Smart Motorway between M1 J23A and J25.</p> <p>However, there remain considerable development pressures on the SRN within Charnwood and, therefore, we would expect the new Local Plan to set out the need for large development sites to be supported by a Transport Assessment to understand likely traffic implications upon the operation of the SRN. We have noted that under the 'Key Issues' section of the Discussion Paper that consideration is given to the impact of growth on the road network and we welcome this. Specifically we note that the Plan will aim to locate new homes and jobs in locations which minimise the need to travel; that further investigative work will be done to understand the impacts on the road network generated by new traffic and identify potential mitigation; and that new and improved infrastructure, including roads, will be required to support new developments with developers potentially being required to fund such improvements. We have no further comments to provide at this stage but would welcome ongoing engagement with Charnwood Borough Council as the new Local Plan progresses.</p>	
<p>TLP/78 Wallace Land Investments</p>	<p>Wallace Land Investments ("Wallace") specialise in the promotion and subsequent delivery of strategic land for residential and mixed use development across England and Scotland. These schemes range from 50 to 2,500 new homes and involve a mixture of uses such as employment land and community facilities and infrastructure. From this experience Wallace understands the need for local plans to deliver the right amount of homes and jobs in the right locations in aid of facilitating thriving but sustainable local places the country needs. To do this, every effort should be made to objectively identify and meet the full housing and economic needs of an area, whilst responding positively to the wider opportunities for growth.</p> <p>This submission provides Wallace's representations to Charnwood Local Plan Discussions Paper. Wallace support the preparation of a Plan to cover the extended period to 2036 and welcome the acknowledge from the LPA that its location in the heart of the three cities of Leicester, Derby and Nottingham brings with it great pressure for development.</p>	<p>We note your comments regarding housing requirements, development strategy options, green wedges and strategic gaps and housing land supply. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation. The Council will continue to work with the other Leicester and Leicestershire Housing Market Area authorities</p>

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	<p>Amount of Growth Required</p> <p>The National Planning Policy Framework (NPPF) seeks to significantly boost the supply of housing to meet identified needs. The Council should plan for its Objectively Assessed Housing Needs (OAHN) as a minimum as is consistent with the NPPF. The Housing White Paper “Fixing The Broken Housing Market” also emphasises that the Council should be planning for the right homes in the right places by making enough land available to meet assessed housing requirements.</p> <p>The adopted Charnwood Core Strategy (November 2015) set out a housing requirement of 13,490 dwellings/820 per annum over the plan period 2011-2028. The new Local Plan will set out a proposed minimum housing requirement of 24,850 dwellings (994 dwellings per annum) for the extended plan period of 2011 – 2036.</p> <p>The National Planning Practice Guidance (NPPG) currently advises that OAHN should be unconstrained (ID 2a-004) and assessed in relation to the relevant functional area known as the Housing Market Area (HMA) (ID 2a-008). The NPPG defines a HMA as a geographical area reflecting the key functional linkages between places where people live and work. Charnwood Borough Council is part of the Leicester & Leicestershire HMA together with Leicester, Oadby & Wigston, Melton, North West Leicestershire and Hinckley & Bosworth. The NPPG methodology is a three stage process comprising:</p> <ul style="list-style-type: none"> • Demographic (based on past population change and Household Formation Rates (HFR)) (ID 2a-015 – 017); • Economic (to accommodate and not jeopardise future job growth) (ID 2a-018); • Market signals (to counter-act worsening affordability caused by undersupply relative to demand) (ID 2a-019 & 020); • Affordable housing need is separately assessed (ID 2a-022 – 028) however the delivery of affordable housing can be a consideration for increasing planned housing provision (ID 2a-029). <p>The Housing & Economic Development Needs Assessment (HEDNA) 2017 by GL Hearn calculates OAHN of 117,900 dwellings (4,716 dwellings per annum) for the HMA between 2011 – 2036 and 24,850 dwellings (994 dwellings per annum) for Charnwood. The OAHN of 994 dwellings per annum for Charnwood comprises of:</p> <ul style="list-style-type: none"> • Demographic need of 947 dwellings per annum based on 10 year migration trend; • Plus an affordability adjustment of 47 dwellings per annum. <p>However, the Government has been critical that honest assessments of housing needs have not been undertaken. The Government has set out proposals for a standard methodology for the calculation of OAHN. This methodology is summarised as:</p>	<p>under the duty to cooperate.</p>

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	<ul style="list-style-type: none"> • Demographic baseline based on annual average household growth over a 10 year period; • Workplace-based median house price to median earnings ratio; • Adjustment factor = Local affordability ratio – 4 x 0.25;/4 • Local Housing Need = (1 + adjustment factor) x projected household growth. <p>By the time of the submission of the Charnwood Local Plan for Examination the Government’s standard methodology will have been implemented. Using the proposed methodology the minimum OAHN (SOAHN) for the Leicester & Leicestershire HMA is estimated as 4,743 dwellings per annum and for Charnwood 1,047 dwellings per annum.</p> <p>The council must clearly justify its proposed housing requirement which is less than the SOAHN. Furthermore, the SOAHN is intended as a starting point, i.e. it is a minimum so there should be no reason to have a housing requirement below this.</p> <p>In addition, the Council must consider their Duty to Co-operate and the commitments it has made through this to engage on a constructive on-going and active basis with the other Leicester and Leicestershire HMA authorities to maximise the effectiveness of place-making. To date the Leicester & Leicestershire HMA authorities have failed to determine where in the HMA the declared unmet housing needs from Leicester City will be met. The non-statutory Draft Leicester & Leicestershire Strategic Growth Plan (SGP) states that “The agreed distribution for the period 2011 – 2036 will be set out in a Memorandum of Understanding (MoU) which will be published in early 2018. This will be used as the basis for preparing or reviewing Local Plans with 2036 as an end date”. It was understood that the authorities would be signing this MoU in January 2018 now it is understood that the MoU will not be signed until after the publication of a Draft Local Plan for Leicester which is not anticipated until late 2018. The proposed housing requirement for Charnwood for the plan period ending 2036 should include provision for unmet needs from Leicester city.</p> <p>Development Strategy Options</p> <p>First and foremost, the new Local Plan should be aligned with the spatial distribution strategy of the non-statutory Leicester & Leicestershire SGP. The Draft SGP proposes to deliver a step change in growth by focusing additional housing needs in strategic locations and less on non-strategic sites thereby reducing the amount of development in existing towns, villages & rural areas.</p> <p>The Draft SGP proposes that Charnwood meets its own housing needs via an infrastructure led approach to development. Three strategic locations are identified in Charnwood namely North East of Leicester city as part of the Primary Growth Area for circa 40,000 dwellings, the Northern Gateway as part of the Secondary Growth Areas for circa 10,000 dwellings and in Loughborough as an Area of Managed Growth. Although the Draft SGP proposals occur beyond the new Local Plan end date given the long lead in times associated with strategic developments such proposals should be given due consideration during current plan preparation.</p>	

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	<p>The Council's discussion paper identifies 7 Options for Development, we do not repeat them here but comment that Options 1 and 5 both requirement a focus of development in the Urban Areas of Leicester and Loughborough where the Discussion Paper itself acknowledges there is insufficient land to meet the growth scenario needs, thus these two options should be ruled out.</p> <p>Option 7 solely relies on the creation of new settlements. It is a well known fact within the industry that new settlements and significant urban extensions take a notoriously long time to come to fruition. There is recent evidence and research to demonstrate that large scale sites have significant lead in times and delivery is therefore affected. Research by NLP (November 2016) confirms that on average the lead in time for large sites prior to the submission of even the first planning application is 3.9 years, with the planning approval period on average being 6.1 years for schemes of 2,000+ dwellings. This NLP report follows on from a national study in February 2014, commissioned by Gladman Developments Limited, which was based upon nationwide empirical evidence from LPAs that an 8-year period should be allowed for the delivery of homes on Strategic Urban Extension sites to allow for local plans to be in place and adopted. Research and evidence like this must be considered by the Local Plan and is material to devising the appropriate strategy. Delays to delivery and significant lead in times will affect how strategic allocation sites come forward and therefore how the infrastructure is delivered, and how and when funding can be made available by the various developments.</p> <p>On this basis Option 7 should be ruled out as a stand alone option.</p> <p>This leaves options 2, 3, 4 and 6. It is considered that the best option would in fact be an amalgamation of the four remaining growth options.</p> <p>It is also noted that the Council are proposing to continue to propose Green Wedges and Strategic Gaps, there is no national policy for the provision of such gaps or wedges designations. The NPPF and NPPG make no reference to them and provide no advice on the detailed definition of boundaries, as such these designations should be reviewed and reconsidered by the Council.</p> <p>In terms of planning for a housing land supply contingency, it is considered that a minimum of 20% contingency should be planned for. It is acknowledged there can be no numerical formula to determine the appropriate quantum of such a flexibility contingency however where a Local Plan or a particular settlement or locality is highly dependent upon one, or relatively few, large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified.</p> <p>As identified in Sir Oliver Letwin's interim findings large housing sites may be held back by numerous constraints including discharge of pre-commencement planning conditions, limited availability of skilled labour, limited supplies of building materials, limited availability of capital, constrained logistics of sites, slow speed of installation by utility companies, difficulties of land remediation, provision of local transport infrastructure, absorption sales rates of open market housing and limitations on open market</p>	

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	<p>housing receipts to cross subsidise affordable housing.</p> <p>For the Council to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets whilst large strategic sites may have multiple outlets usually increasing the number of sales outlets available inevitably means increasing the number of housing site allocations in the case of Charnwood large existing strategic sites should be complimented by smaller scale non-strategic sites.</p> <p>Conclusions Wallace appreciate the opportunity to assist the Council in informing the next stages of the Charnwood Borough Local Plan. Wallace would very much welcome the opportunity for further discussion/consultation with the LPA and would welcome the opportunity to partake in the Local Plan Examination in due course.</p>	
<p>TLP/79 Anstey Parish Council</p>	<p>Introduction</p> <ol style="list-style-type: none"> 1. CBC have published their document 'Towards a Local Plan for Charnwood' which will form the basis about where future housing and employment development should be accommodated within the Borough. 2. The draft Plan is suggesting that a minimum of 994 new homes will be required in the Borough each year up to 2036. Whilst it is difficult to argue against this figure, this report sets out how best to minimise the impact of this development on Anstey. 3. In terms of employment, the picture is a bit clearer in that much of the required employment development area has been identified and approved in the previous Local Plan. The only exception is the B8 large warehousing requirement. As this is specifically targeted at an area NE of J23 on the M1, it is unlikely to impact on Anstey. Hence, this aspect of the draft plan should be supported. <p>Housing Mix</p> <ol style="list-style-type: none"> 4. CBC's document states that affordable housing is needed as well as smaller homes for older residents to 'down-size' into. This has been one of Anstey PC's aspirations for some years now and should be supported. <p>Environment and Landscape</p> <ol style="list-style-type: none"> 5. Whilst the document 'highly values' the environment and landscape in Charnwood, there appears to be no mention of protection of this highly-valued resource. Hence, APC propose that strongly-worded protective policies should be included in the draft plan. <p>Green Wedges and Areas of Separation</p> <ol style="list-style-type: none"> 6. The document proposes to keep <ol style="list-style-type: none"> a) The Area of Local Separation between Anstey and Newtown Linford; and b) The green wedge described as 'Leicester (Beaumont Leys)/Birstall/Thurcaston/Cropston/Anstey/Glenfrith/Groby.' 	<p>We note your comments on green wedge and area of local separation and the limits to development for Anstey. We also note your comments on a number of topics including housing requirements, environmental and landscape protection, flood risk, employment, housing mix and community facilities. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>APC should strongly support the retention of these 2 areas. (Although the exact boundary of the Green Wedge should be double-checked). APC should also support the proposed Limits of Development for the village.</p> <p>Flood Risk</p> <p>7. Whilst the document refers to concerns about flooding associated with the River Soar and the River Wreake, it makes no mention of similar flood risks relating to the Rothley Brook and APC propose that this omission should be rectified.</p> <p>Anstey as one of the 6 Service Centres</p> <p>8. APC acknowledges its role as a Service Centre and accepts the settlement hierarchy proposed. However, the Council would like to see more support for the businesses in the centre of the village by the adoption of some sort of Economic Development policy to specifically support service centres.</p> <p>Infrastructure and Services</p> <p>9. APC supports the need for improved transport networks, health and education facilities and other related enhancements necessitated by proposed developments. In light of Charnwood's evidence that 37% of Anstey residents travel to work in Leicester, reliable public transport is required to reduce the impact of additional traffic on the roads locally. The report also makes no reference to the impact of the Ashton Green development in North Leicester. APC would ask Charnwood Borough Council to use their best endeavours to protect transport routes to Loughborough and Coalville.</p> <p>Viability and Deliverability</p> <p>10. The document appears to suggest that the policies approved by CBC and included in their adopted Local Plan are not achievable in the original Local Plan period, (up to 2028). This appears to be a serious short-coming in the adopted Local Plan that is likely to lead to residential development over and above the originally approved number of homes to be provided. This may lead to development in other areas not included in the plan and APC object to this approach.</p> <p>Housing Requirements</p> <p>11. This issue is linked to paragraph 10 above. Table 2 in the document states that sites for 6,451 new need to be found up to 2036. However, paragraph 4.4 then states that a minimum of 8,100 homes will be needed; (an increase of 1,649). The discrepancy in these 2 figures is not clear, although an explanation of sorts is given. The assumption that 'not all homes allocated in the core strategy and with planning permission will be built by 2036' needs to be robustly challenged. Additionally, many of the Housing Sites promoted or suggested in Appendix C are outside the proposed Limits of Development for the village and are in Areas of Local Separation or Green Wedge. In this case APC do not support their inclusion and do not believe that they could be delivered without disregarding key principles of the local plan.</p> <p>Housing Options</p> <p>12. CBC puts forward 7 options for the distribution of the required, as follows:</p> <ul style="list-style-type: none">) Leicester and Loughborough Urban Areas.) Leicester and Loughborough Urban Areas and Service Centres. 	

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	<ul style="list-style-type: none">) Leicester and Loughborough Urban Areas and Service Centres and other settlements.) Proportionate Distribution based on existing populations.) Leicester and Loughborough Urban Areas and new settlements.) Leicester and Loughborough Urban Areas and Service Centres and new settlements.) New Settlements. <p>13. The options with the least impact upon Anstey are the first, fifth and seventh. Of these, it is likely that Option 1 will be considered 'most practical' as easiest to implement. APC would also support and urge Charnwood Borough Council to use new settlements to ease new housing pressures within existing settlements.</p> <p>14. It is therefore proposed that APC should support Option 1 in that:</p> <ul style="list-style-type: none"> a) The infrastructure should be completed (for earlier phases of the 3 urban extension) and should be more easily extendable; b) Additional homes in these areas will more strongly support services provided to sustain these new developments; and c) It is the most sustainable option. <p>Employment Options</p> <p>15. As indicated in paragraph 3 above, employment needs, with the exception of large-scale B8 Warehousing, have been met and hence it is proposed that APC makes no comments on this aspect of the draft plan.</p>	
TLP/80	<p>We wish to oppose the inclusion of the following areas of land for housing development in the Charnwood Local Plan, PSH79, PSH80, PSH72 and PSH110.</p> <p>The proposed developments would mean a large increase in housing around Wanlip to such an extent that the present village would disappear. The areas of separation would disappear and Wanlip village would just become part of Birstall. We don't want such an ancient village to be consumed by the urban sprawl. A village envelope was created for Wanlip when it was popular to promote such a policy and all these proposed sites are outside the envelope. Why are we intent, as a country, on destroying our ancient heritage?</p> <p>The areas identified are all good arable land which will be lost forever (like so many other fields) if they are built on.</p> <p>Where is the infrastructure to support so many new Homes? There will be a massive increase in traffic with which the roads could not cope, leading to jams and frustrations for motorists and residents alike. Rectory Road through Wanlip would become a 'rat run' for motorists trying to avoid the queues. New roads would not solve the problems just take up more countryside and move the problems elsewhere. This is not progress. Also, at the moment there isn't a bus service through Wanlip so there is no alternative to the motor car.</p> <p>Medical facilities are already stretched. At least one new GP practice would be necessary to cope with</p>	<p>The Towards a Local Plan consultation has been informed by the Strategic Housing Land Availability Assessment which included sites which developers would like to promote for residential development. No decisions have been made at this stage about any of these sites and their suitability for allocation in the Draft Local Plan as residential sites.</p> <p>We note your concerns about any future development at Wanlip. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation and</p>

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	<p>the increase in patients.</p> <p>At the moment there are about 60 houses in Wanlip with a good village spirit and a simple structure (the Village Meeting) to enable matters to be discussed by all of the villagers if they so wish. This is a democratic structure that has stood the test of time and allowed decisions to be made by the whole village. Increasing the houses by 179 + 1650 for Broadnook will destroy this simple and effective system for ever.</p> <p>Specific points re: PSH80 (Land off Butchers Lane) Building on this land has already been refused due to the difficult access via Butchers Lane. Sixty houses are proposed in the Local Plan giving a potential of more than 120 additional motor cars entering and exiting via Butchers Lane and through the village. The South Eastern corner is subject to flooding and the whole area is very close to Wanlip Meadows so development could affect the wildlife which, at the moment, has a tranquil existence. Building on this site would considerably reduce the separation between Wanlip and Birstall which, as already stated, is to the detriment of our ancient village structure.</p> <p>Specific points re: PSH 72 (Land off Wanlip Lane) This land is an integral part of the area of separation between Wanlip and Birstall. Any development would erode this separation and in time with further development lead to Wanlip being joined with Birstall. Also, the cars would enter and exit opposite or very near to the Cedars Academy, not very safe for the children. More traffic again for which the roads are not suitable.</p>	<p>be accompanied by an appropriate range of evidence, and supporting documents.</p>
TLP/81	<p>I would like to make comment on the strategic housing land availability plan 2036 with sites listed in and around Wanlip village.</p> <p>Wanlip is a village with two Grade II listed buildings; St Nicholas and our Lady CofE Church and the Ice house, both dating from the 14th Century with unique architectural heritage, a church and community hall, and eighty two residential properties.</p> <p>To the south of the village is Wan lip Meadows Nature Reserve which lies next to the River Soar. The wetlands are home to a large number of wildfowl, including Lapwing, Wood Sandpipers and Herons.</p> <p>Land off of Butchers Lane, Wanlip This land has been considered for planning previously and rejected. The main access to this site is via Church Road, turning onto Butchers Lane via a blind corner which would not be at all suitable for the volume of traffic that could be introduced to the village should this land be built upon. This land is also part of wan lip villages green envelope of separation from Birstall. Since moving to the village in 1982, I have seen a considerable change in the water table on this site. This field never used to flood in 1982, however now after just one day of heavy rain, it floods in the south East corner, adjoining to the Wan lip Meadows Nature Reserve. The Nature Reserve is also part of the River Soar flood plain. The field is</p>	<p>The Towards a Local Plan consultation has been informed by the Strategic Housing Land Availability Assessment which included sites which developers would like to promote for residential development. No decisions have been made at this stage about any of these sites and their suitability for allocation in the Draft Local Plan as residential sites.</p> <p>We note your concerns about any future development at Wanlip. The responses received to this consultation will be considered and used to</p>

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	<p>also situated above a large sewer pipe, put in by Seaford Betty; surely it is not safe to build homes above such a large sewer!</p> <p>Land off of Wan lip Lane This is also part of the Wanlip green envelope and if allowed to be developed would impact with an increase in the volume of traffic through Wanlip village. It will also create increased surface water runoff into the village. Building homes upon this land will also open up the entire green envelope for building potential which is unacceptable to Wanlip village.</p> <p>Land off of Rectory Road, Wanlip This is the land which Manor Farm is built upon. The site would greatly increase the volume of the traffic in the village which it would not be able to cope with. Again, it would increase the surface water runoff into the village, threatening homes within the village. Wan lip village has no amenities, being required to use neighbouring villages for services. These are already overstretched and could not cope with an increase in the local population.</p> <p>Wanlip residents are very proud of rural village environment. Residents know each well, and keep it a safe, happy and caring community. If any development was allowed, this would change the village dynamic, increasing negative behaviour, and putting pressure on the already stretched infrastructure of the village.</p> <p>Charnwood Borough Council are encouraging villages to take pride in their environment, keeping it clear of litter and a beautiful place to live. Increasing the traffic throughout the village through the addition of new homes would create monumental increases in pollution, and would require major improvements to the road systems in and around Wanlip, and improvements to the drains and sewers. This is unlikely to take place, and would impact on the village in a detrimental way.</p> <p>I therefore implore you to prevent further building work taking place within Wanlip village; the village would not be able to cope with the increased population, traffic and pressures on the infrastructure.</p>	<p>inform the preparation of the Draft Local Plan which will be published for consultation and be accompanied by an appropriate range of evidence, and supporting documents.</p>
TLP/82	<p>With reference to the strategic housing land availability assessment for Charnwood up to 2036.</p> <p>As a resident of Wanlip I would like to object to the inclusion of several areas of proposed development on the planning assessment around the village.</p> <p>Wan lip is an historic village dating back many hundreds of years and is mentioned in the doomsday book. It is a beautiful rural enclave and to maintain our identity as a village, we have given away 70% of our land to Birstall and have requested a boundary change to remove the Broadnook site (PSH110) from Wanlip land.</p> <p>The proposal of development around the village would increase the housing by a staggering 250%</p>	<p>The Towards a Local Plan consultation has been informed by the Strategic Housing Land Availability Assessment which included sites which developers would like to promote for residential development. No decisions have been made at this stage about any of these sites and their suitability for allocation in the Draft Local Plan</p>

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	<p>destroying the village and its environment and that is before you take into account the land included in PSH110 east of the A6 which has a commercial development planned.</p> <p>I was disappointed to see the proposal still included a potential bypass from the A46 to Rectory road across PSH79. This has already been shown to be unsuitable from previous plans.</p> <p>The land south of Wan lip is required as a green wedge between Wanlip and Birstall and some of this land is a flood plain area.</p> <p>The site of PSH80 dips towards this flood plain and is liable to flooding, also this site has already been rejected for development by the highways authority as the access is considered dangerous.</p> <p>There are limited pavements around the village and any increase in traffic would be a health risk and a danger to everyone.</p> <p>There is also a sewer pipe that runs under this site from Seven Trent and an inspection chamber in the field.</p> <p>The area of PSH80 is on the edge of the watermead park and the ecology of the area would be drastically altered by any development.</p> <p>The village has a village envelope in place so no building should take place beyond that envelope and in discussions over the core strategy with councillors, the village was told by councillors they would honour that envelope.</p> <p>May I also draw your attention to the strategic planning identity ref: number 9 concerning small hamlet protection. The area is also classed as an unsustainable settlement and unsuitable for development.</p> <p>The removal of the proposed sites PSH79 and PSH80 is essential to the life, health and protection of the village of Wanlip.</p> <p>The area of proposed site PSH72 next to Birstall, while only a small development would set a precedent for future development on this area of green wedge and should not be included on the proposed land development.</p>	<p>as residential sites.</p> <p>We note your concerns about any future development at Wanlip. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation and be accompanied by an appropriate range of evidence, and supporting documents.</p>
TLP/83	<p>With reference to the strategic housing land availability assessment for Charnwood up to 2036.</p> <p>As a resident of Wanlip I would like to object to the inclusion of several areas of proposed development on the planning assessment around the village.</p> <p>Wanlip is an historic village dating back many hundreds of years and is mentioned in the doomsday</p>	<p>The Towards a Local Plan consultation has been informed by the Strategic Housing Land Availability Assessment which included sites which developers would like to promote for</p>

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	<p>book. It is a beautiful rural enclave and to maintain our identity as a village, we have given away 70% of our land to Birstall and have requested a boundary change to remove the Broadnook site (PSH110) from Wanlip land.</p> <p>The proposal of development around the village would increase the housing by a staggering 250% destroying the village and its environment and that is before you take into account the land included in PSH110 east of the A6 which has a commercial development planned.</p> <p>I was disappointed to see the proposal still included a potential bypass from the A46 to Rectory road across PSH79. This has already been shown to be unsuitable from previous plans.</p> <p>The land south of Wanlip is required as a green wedge between Wanlip and Birstall and some of this land is a flood plain area.</p> <p>The site of PSH80 dips towards this flood plain and is liable to flooding, also this site has already been rejected for development by the highways authority as the access is considered dangerous.</p> <p>There are limited pavements around the village and any increase in traffic would be a health risk and a danger to everyone.</p> <p>There is also a sewer pipe that runs under this site from Seven Trent and an inspection chamber in the field.</p> <p>The area of PSH80 is on the edge of the watermead park and the ecology of the area would be drastically altered by any development.</p> <p>The village has a village envelope in place so no building should take place beyond that envelope and in discussions over the core strategy with councillors, the village was told by councillors they would honour that envelope.</p> <p>May I also draw your attention to the strategic planning identity ref: number 9 concerning small hamlet protection. The area is also classed as an unsustainable settlement and unsuitable for development.</p> <p>The removal of the proposed sites PSH79 and PSH80 is essential to the life, health and protection of the village of Wanlip.</p> <p>The area of proposed site PSH72 next to Birstall, while only a small development would set a precedent for future development on this area of green wedge and should not be included on the proposed land development.</p>	<p>residential development. No decisions have been made at this stage about any of these sites and their suitability for allocation in the Draft Local Plan as residential sites.</p> <p>We note your concerns about any future development at Wanlip. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation and be accompanied by an appropriate range of evidence, and supporting documents.</p>

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<p>TLP/84 Harborough District Council</p>	<p>Harborough District Council notes the progress made on the Charnwood Local Plan and welcomes the opportunity to comment. The reference to Joint Working through the Strategic Growth Plan is welcomed and it is important that the Charnwood Local Plan has regard to the Strategic Growth Plan and any Memorandum of Understanding/Statement of Common Ground on Strategic Planning matters.</p> <p>We look forward to continued Joint Working with Charnwood and other HMA partners on a range of strategic planning matters, including the distribution of housing and the Logistics & Strategic Distribution sector in Leicester & Leicestershire.</p>	<p>We note your comments on the importance of joint working. The Borough Council has worked closely with our local authority partners in Leicester and Leicestershire in the preparation of the Strategic Growth Plan and parts of the evidence base which will inform our policies. We welcome ongoing cooperation in developing our policies.</p>
<p>TLP/85 Marrons on behalf of Hallam Land Management</p>	<p>Introduction</p> <p>1.1 These representations have been prepared by Marrons Planning on behalf of Hallam Land Management (HLM), in respect of their land interests at Melton Road, Queniborough (SHLAA reference PSH42). The site extends to 10.2 hectares, and is currently the subject of a pending outline planning application for up to 220 homes (application reference P/18/0611/2).</p> <p>1.2 Comments in relation to the proposals for Areas of Separation, settlement hierarchy, scale and distribution of growth are set out below, together with support in relation to the allocation of HLM's site at Melton Road Queniborough.</p> <p>Areas of Separation</p> <p>1.3 The Council is seeking views on its Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation Study (2016) as part of the current Local Plan consultation.</p> <p>1.4 HLM's site at Melton Road, Queniborough is located within the Queniborough/East Goscote Area of Local Separation. In the Council's Study, the Melton Road site forms a comparatively small component of the wider ALSJ, which covers some 120 ha of land.</p> <p>1.5 A Landscape and Visual Appraisal has been prepared as part of the current outline planning application submission at Melton Road, Queniborough. The Appraisal deals with the site's impact upon the ALS in detail (Section 9), an extract of which is set out below (paragraphs 9.1-9.4):</p> <p>“Through the fieldwork it is evident that that there is already a strong sense of visual and physical separation between Queniborough and East Goscote on account of natural features and the road corridor of the A607. The southern edge of East Goscote is characterised by largely continuous mature vegetation along Queniborough Brook, whilst the tree lined corridor of embanked A607, that sits above the valley, adds a further layer of containment. These elements, alongside vegetation on the settlement</p>	<p>We note your comments with respect to Queniborough, and in particular, land at Melton Road, Queniborough. No decisions have been made at this stage about the preferred approach. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>The Council will continue to work with the other Leicester and Leicestershire Housing Market Area authorities under the duty to cooperate.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p>

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	<p>edge of Queniborough, provides separation between East Goscote and Queniborough. The Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation (2016) concludes that:</p> <p>“The A607, which has a dense planting buffer and elevated position for much of its length, increases the perceived distance between Queniborough and East Goscote in the north-west of the AoLS and, to an extent, restricts the settlements from coalescing (though the northeast is much more open and the gap feels narrower).”</p> <p>It is considered that the masterplanning approach adopted by the new development would be in accordance with Policy CS11 of the Local Plan, in that it would “maintain the separation between the built-up areas of these settlements” and that the “narrow gap” would not be reduced. Firstly, the built development would not extend the settlement any further north than the current built edge at New Zealand Lane, and no further east than Queniborough’s eastern most built edge. Secondly, tree planting around the site’s northern and eastern boundaries would reinforce the containment and separation that already exists. And, thirdly, there would be no impact or reduction upon the gap between Syston and Queniborough as new housing would effectively be contained by the existing building line at New Zealand Lane. There would, in conclusion, continue to be separation between Queniborough and East Goscote and Queniborough and Syston such that the purpose of the ‘Area of Local Separation’ would continue to function.”</p> <p>1.6 On the basis of this assessment, HLM’s site could be removed from the Area of Separation without impacting upon its overall purpose and function. As part of the review of the Borough’s settlement limits, there is a strong case for enabling additional development to come forward at Queniborough, and comments in relation to the settlement hierarchy, scale and distribution of planned growth for Charnwood are set out below.</p> <p>Settlement Hierarchy</p> <p>1.7 Table 1 of the consultation paper sets out a proposed settlement hierarchy for Charnwood. It is proposed that Queniborough is located within the fourth tier of the settlement hierarchy as an ‘Other Settlement’. ‘Other Settlements’ are defined as those which have “some of the services and facilities to meet the day to day needs of the community.” The Council’s justification for the proposed settlement hierarchy is provided by the Settlement Hierarchy Assessment (SHA) (March 2018).</p> <p>1.8 The SHA concludes that Queniborough has all four of the ‘essential’ facilities and services (food shop, primary school, good access to employment and high speed broadband) and four of the ‘desirable’ services and facilities (access to secondary school, range of recreation, leisure and community facilities, post office and pre-school provision) (Figure 10 refers). A comparison of the Council’s assessment of the Service Centres and Other Settlements has been undertaken below:</p>	

Settlement	Proposed Tier in Settlement Hierarchy	Number of Essential Facilities (/4)	Number of Desirable Facilities (/7)	Total (/11)
Anstey	Service Centres	4	7	11
Barrow upon Soar	Service Centres	4	7	11
Mountsorrel	Service Centres	4	7	11
Quorn	Service Centres	4	7	11
Sileby	Service Centres	4	7	11
Rothley	Service Centres	4	6	10
Queniborough	Other Settlement	4	4	8
Hathern	Other Settlement	3	6	9
Woodhouse Eaves	Other Settlement	3	6	9
East Goscote	Other Settlement	3	5	8
Cossington	Other Settlement	3	3	6
Rearsby	Other Settlement	3	2	5
Wymeswold	Other Settlement	2	3	5
Barkby	Other Settlement	2	2	4
Burton on the Wolds	Other Settlement	2	2	4
Newtown Linford	Other Settlement	2	2	4
Seagrave	Other Settlement	2	2	4
Swithland	Other Settlement	2	2	4
Thrussington	Other Settlement	2	2	4
Thurcaston	Other Settlement	2	2	4

1.9 Queniborough has all of the identified essential facilities and is therefore comparable with the Service Centres. Whilst the consultation paper states that the relationship each settlement has with the urban centres of Loughborough and Leicester has been assessed, the relationship between smaller settlements (such as Queniborough and Syston) has not, in our opinion, been adequately assessed. Paragraph 55 of the NPPF emphasises the importance of groups of smaller settlements stating that they may support one other and that “to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities.”

1.10 Within the above context, HLM has the following points in relation to the SHA:

- Higher order services access – Queniborough has a frequent (every 20 minutes) bus service to Leicester. However, because the journey takes 37 minutes this is deemed to be insufficient to achieve a score in the assessment. Aside from Hathern and Cossington, the journey time to either Leicester or Loughborough is the fastest of all the ‘Other Settlements’ and is the most frequent. The journey time is only 7 minutes from achieving a ‘very good’ score, which should be taken into account when considered

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	<p>alongside the availability of all other services and facilities in the village/nearby.</p> <ul style="list-style-type: none"> • Secondary School access – whilst Queniborough receives a score within this category, access is assessed as being ‘good’. ‘Good’ is defined in Annex A as being “accessible via a bus or train service.” Whilst Wreake Academy is in Syston, this assessment does not take account of the close proximity of the school to Queniborough – it is within approximately 750 m of the Melton Road site. • Doctor’s Surgery – whilst there is no surgery in Queniborough, there is a GP practice in Syston which is within 1.10 km of the Melton Road site and accessible by bus. • Pharmacy – whilst there is no pharmacy in Queniborough, there is a pharmacy in Syston which is within 1.10 km of the Melton Road site and accessible by bus. <p>1.11 In the case of Queniborough, the Council’s conclusion that the ‘Other Settlements’ “have [only] some of the services and facilities needed to meet resident’s day to day needs” (paragraph 9.14) is not considered to be wholly accurate when considering the village’s relationship with nearby Syston, which is accessible on foot, by bike and by bus. We therefore conclude that Queniborough should be categorised as a Service Centre in the settlement hierarchy.</p> <p>Housing Need</p> <p>1.12 The consultation paper is relying on evidence presented in the Housing and Economic Development Needs Assessment (2017) which found a need for 994 dwellings per annum (dpa) between 2011 and 2036 (24,850 in total). Taking into account 18,399 completions and commitments, it is the Borough Council’s position that sites for 6,451 homes need to be found. Taking into account sites that will be delivered after 2036, a minimum of 8,100 homes are required.</p> <p>1.13 Some caution should be taken with the above proposed figure. The 994 dpa figure does not take into account the fact that Leicester City Council and Oadby and Wigston Borough Council are unable to meet their housing need within their own boundaries and would need to accommodate their unmet need within other local planning authority areas.</p> <p>1.14 In addition, the Council should be mindful that the government is proposing a new standardised approach to housing need, which will be expected to take effect when plans are submitted six months after the publication of the new NPPF. It is understood that the NPPF is expected to be published later this year, with the new standardised approach to take effect from around March 2019. Figures produced by the government last year suggested Charnwood would be required to plan for 1,045 dpa (2016-2026), although a new set of figures based upon updated population projections are expected by the time the standardised approach is due to take effect. The standardised figure may also need to be adapted to meet unmet needs from neighbouring authorities.</p> <p>1.15 Finally, Local Plans should incorporate sufficient flexibility to adapt to rapid change and ensure that authorities can boost significantly the supply of housing. This is particularly important with regards to the requirement for authorities to identify a five year supply of deliverable housing sites, especially as</p>	

RESPONSE NO/ CONSULTEE	RESPONSES	OFFICER COMMENTS
	<p>the definition of what constitutes deliverable is due to change with the publication of the new NPPF:</p> <p>“Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”</p> <p>1.16 As planning permissions and allocations make up 14,140 of the 18,399 completed/committed dwellings (76%) set out in Table 2 of the consultation document, it would be advisable for Charnwood to plan for a higher number of dwellings. As there is evidence to suggest that planning for 15,700 new homes would provide sufficient flexibility to take account of changing circumstances, it would be advisable to plan for this higher amount.</p> <p>Growth Scenarios</p> <p>1.17 When considering the proposed growth scenarios, Hallam Land Management considers that the following paragraphs of the NPPF should be taken into account:</p> <ul style="list-style-type: none"> • Paragraph 17 – which recognises the intrinsic character and beauty of the countryside and seeks to support the thriving rural communities within it; • Paragraph 29 – which recognises that different transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas; • Paragraph 54 – which directs local authorities to be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing in rural areas and to also consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs; • Paragraph 55 –to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. <p>1.18 The Planning Practice Guidance (PPG) provides further advice on how local authorities should support sustainable rural communities (Paragraph: 001 Reference ID: 50-001-20160519):</p> <ul style="list-style-type: none"> • The government believes it is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. • A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities. • All settlements can play a role in delivering sustainable development in rural areas, and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided. 	

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	<p>1.19 Within the above context, Hallam Land Management supports Options 3 and 4, which would enable the delivery of housing in the Borough's villages (Service Centres and Other Settlements). This would have the benefit of meeting local housing need in rural areas, including affordable housing, whilst helping to sustain and enhance local services and facilities.</p> <p>1.20 It is recommended that a further detailed assessment of sites is carried out in rural areas to identify an appropriate level of housing within the Borough's villages. However it is worth noting that a proportionate distribution approach in the rural areas, supported by detailed site assessments and allocations, has been adopted in Melton Borough. The Local Plan has undergone examination, and the approach to distribution on this basis has been broadly accepted by the Local Plan Inspector.</p> <p>Housing Sites</p> <p>1.21 It is Hallam Land Management's position that the site at Melton Road Queniborough is a sustainable site for housing. In addition to the arguments presented above in respect of the Area of Separation designation, the application is accompanied by a suite of supporting documents which demonstrate that the proposed development would:</p> <ul style="list-style-type: none"> • Provide 40% affordable housing (equivalent to 88 homes); • Provide a large amount (far in excess of the Council's policy requirements) of public open space including a new Locally Equipped Area of Play (LEAP) in a settlement which has a deficit in most of the open space typologies (as concluded in the Charnwood Open Space Assessment); • Make financial contributions to education and healthcare where the proposed development would have a negative impact on the capacity of these facilities; • Retain the majority of existing trees and hedgerows as well as provide new tree planting and landscaping. Large areas of green infrastructure and an surface water attenuation pond will be provided which could provide ecological enhancements; • Provide economic benefits to the local area (via the provision of construction jobs, indirect jobs in the housebuilding supply chain, increased expenditure in the local area associated with the furnishing of new homes, as well as revenue for Charnwood Borough Council via council tax payments and New Homes Bonus payments. The local economy should also benefit from increased footfall and expenditure at local shops and businesses); • Not result in the loss of best and most versatile agricultural land (the site is predominantly grade 3b agricultural land. Areas of grade 3a are recorded in the east and west of the site, but these are considered to be subgrade); • Deliver a safe and suitable access and would not have a severe impact on offsite junctions (a suitable access arrangement is currently being discussed with the LHA after initial comments made); • Not result in the loss of important ecological habitat (the majority of the site comprises grassland of limited value and would retain all mature trees and dry ditch as well as provide new areas of wildlife habitat); • Not impact any designated heritage assets in the surrounding area; 	

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	<ul style="list-style-type: none"> • Is suitable in flood risk terms (all built development would be within Flood Zone 1), would incorporate a sustainable drainage strategy which demonstrates that the site can be successfully drained without increasing the risk of flood risk elsewhere. <p>1.22 Whilst the application is still pending, to date the following statutory consultees have no objections to the proposals outright; subject to appropriate planning conditions; or subject to appropriate planning obligations being made via a S106 agreement:</p> <ul style="list-style-type: none"> • CBC Environmental Health • Historic England • Leicestershire County Council as Lead Local Flood Authority • Leicestershire County Council S106 • Leicestershire County Council as Minerals Planning Authority <p>1.23 In addition it is worth noting that the site is being promoted by Hallam Land Management Limited, a company with an outstanding record of delivering residential schemes across the country. Thus the site would be readily available straight away if approved planning permission which is especially important when considered in the context of footnote 11 to paragraph 49 of the current NPPF.</p> <p>Summary and Conclusions</p> <p>1.24 The above representations can be summarised as follows:</p> <ul style="list-style-type: none"> • To ensure the Local Plan is sufficiently flexible, Charnwood Borough Council should plan for a higher amount of housing than the 8,100 proposed at paragraph 4.4 of the consultation document; • The Council should plan for development in rural areas, which is supported by government policy; • Queniborough should be identified as a Service Centre, and/or a higher level of growth should be planned for in the village than in the majority of the 'Other Settlements' based upon the availability of services and facilities both in the village and in close proximity in Syston; • Land at Melton Road, Queniborough should be allocated as a housing site. An application is pending determination meaning there are a suite of technical reports which support the allocation; • Melton Road Queniborough can be removed from the Area of Separation without adversely impacting the function of the wider Queniborough/East Goscote AoS. <p>Further documents/information submitted with representation ref: TLP/85</p>	
<p>TLP/86 Marrons on behalf of Mather Jamie</p>	<p>Introduction</p> <p>1.1 These representations have been prepared by Marrons Planning on behalf of Mather Jamie in respect of their land interests at East Road, Wymeswold. The site extends to approximately 5 hectares and has been assessed in the Council's 2017 SHLAA (site reference PSH296). A site plan is enclosed with these representations.</p>	<p>We note your comments with respect to the proposed settlement hierarchy and the scale and distribution of growth, with specific reference to land at East Road, Wymeswold.</p>

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	<p>1.2 Comments in relation to the proposed settlement hierarchy, scale and distribution of growth are set out below, together with support in relation to the allocation of the site at East Road, Wymeswold.</p> <p>Settlement Hierarchy</p> <p>1.3 Table 1 of the consultation paper sets out a proposed settlement hierarchy for Charnwood. It is proposed that Wymeswold is located within the fourth tier of the settlement hierarchy as an 'Other Settlement'. 'Other Settlements' are defined as those which have "some of the services and facilities to meet the day to day needs of the community." The Council's justification for the proposed settlement hierarchy is provided by the Settlement Hierarchy Assessment (SHA) (March 2018).</p> <p>1.4 The SHA concludes that Wymeswold has two of the 'essential' facilities and services (primary school and high speed broadband) and three of the 'desirable' services and facilities (access to secondary school, range of recreation, leisure and community facilities and a pharmacy).</p> <p>1.5 The Council's assessment of Wymeswold is not considered to fully reflect its sustainability credentials. The following matters should be taken into account when the Council is considering an appropriate scale of development for Wymeswold:</p> <ul style="list-style-type: none"> • There is an hourly bus service to Loughborough (journey time 31 minutes at peak times and 17 minutes at non-peak times) and to Melton Mowbray (journey time 29 minutes at peak times and 17 minutes at non-peak times) which offers access to employment opportunities and higher order facilities and services. The NPPF (paragraph 29 recognises that different transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas); • Wymeswold has a convenience store (Granvilles) which is open 7 days a week and stocks day to day essentials including bread, milk, fruit and vegetables, household supplies, newspapers etc. • Wymeswold has an outreach post office located at the Wymeswold Memorial Hall and which is open on Monday, Wednesday and Friday afternoons; • There are 2 public houses, a restaurant, village hall, sports field, pavilion and scout hut, play areas and bowling green, allotments which could be sustained and enhanced by an appropriate level of housing development in the village. <p>Housing Need</p> <p>1.6 The consultation paper is relying on evidence presented in the Housing and Economic Development Needs Assessment (2017) which found a need for 994 dwellings per annum (dpa) between 2011 and 2036 (24,850 in total). Taking into account 18,399 completions and commitments, it is the Borough Council's position that sites for 6,451 homes need to be found. Taking into account sites that will be delivered after 2036, a minimum of 8,100 homes are required. 1.7 Some caution should be taken with the above proposed figure. The 994 dpa figure does not take into account the fact that Leicester City Council and Oadby and Wigston Borough Council are unable to meet their housing need within their</p>	<p>No decisions have been made at this stage about the preferred approach. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p>

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	<p>own boundaries and would need to accommodate their unmet need within other local planning authority areas.</p> <p>1.8 In addition, the Council should be mindful that the government is proposing a new standardised approach to housing need, which will be expected to take effect when plans are submitted six months after the publication of the new NPPF. It is understood that the NPPF is expected to be published later this year, with the new standardised approach to take effect from around March 2019. Figures produced by the government last year suggested Charnwood would be required to plan for 1,045 dpa (2016-2026), although a new set of figures based upon updated population projections are expected by the time the standardised approach is due to take effect. The standardised figure may also need to be adapted to meet unmet needs from neighbouring authorities.</p> <p>1.9 Finally, Local Plans should incorporate sufficient flexibility to adapt to rapid change and ensure that authorities can boost significantly the supply of housing. This is particularly important with regards to the requirement for authorities to identify a five year supply of deliverable housing sites, especially as the definition of what constitutes deliverable is due to change with the publication of the new NPPF:</p> <p>“Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that housing completions will begin on site within five years”</p> <p>1.10 As planning permissions and allocations make up 14,140 of the 18,399 completed/committed dwellings (76%) set out in Table 2 of the consultation document, it would be advisable for Charnwood to plan for a higher number of dwellings. As there is evidence to suggest that planning for 15,700 new homes would provide sufficient flexibility to take account of changing circumstances, it would be advisable to plan for this higher amount.</p> <p>Growth Scenarios</p> <p>1.11 When considering the proposed growth scenarios, the following paragraphs of the NPPF should be taken into account:</p> <ul style="list-style-type: none"> • Paragraph 17 – which recognises the intrinsic character and beauty of the countryside and seeks to support the thriving rural communities within it; • Paragraph 29 – which recognises that different transport policies and measures will be required in different communities and opportunities to maximise sustainable transport solutions will vary from urban to rural areas; • Paragraph 54 – which directs local authorities to be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing in rural areas and to also consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs; 	

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	<ul style="list-style-type: none"> • Paragraph 55 –to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. For example, where there are groups of smaller settlements, development in one village may support services in a village nearby. <p>1.12 The Planning Practice Guidance (PPG) provides further advice on how local authorities should support sustainable rural communities (Paragraph: 001 Reference ID: 50-001-20160519):</p> <ul style="list-style-type: none"> • The government believes it is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements. • A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. Rural housing is essential to ensure viable use of these local facilities. • All settlements can play a role in delivering sustainable development in rural areas, and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided. <p>1.13 Within the above context, Mather Jamie supports Options 3 and 4, which would enable the delivery of housing in the Borough’s villages (Service Centres and Other Settlements). This would have the benefit of meeting local housing need in rural areas, including affordable housing, whilst helping to sustain and enhance local services and facilities.</p> <p>1.14 It is recommended that a further detailed assessment of sites is carried out in rural areas to identify an appropriate level of housing within the Borough’s villages. However it is worth noting that a proportionate distribution approach in the rural areas, supported by detailed site assessments and allocations, has been adopted in Melton Borough. The Local Plan has undergone examination, and the approach to distribution on this basis has been broadly accepted by the Local Plan Inspector.</p> <p>Housing Sites</p> <p>1.15 It is Mather Jamie’s position that the site at East Road, Wymeswold is a sustainable site for housing and should be considered for allocation.</p> <p>1.16 The site is assessed in the Council’s SHLAA, where it is stated that “there are no known irresolvable physical/environmental constraints preventing development.” The SHLAA goes on to state that the site does not have good access to facilities and services. However, Wymeswold has a good level of facilities and services for a village of its size and a footpath could be provided along the southern side of East Road could be provided to connect pedestrians with the remainder of the village.</p>	

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	<p>1.17 In addition:</p> <ul style="list-style-type: none"> • The site is in Flood Zone 1 so is suitable for residential development in sequential flood risk terms; • Access to the site could be taken from East Road; • Development which is sympathetic to the surrounding area including the nearby Conservation Area is possible. <p>1.18 The site is predominantly agricultural grassland, so there is the potential for ecological betterment as part of a housing development.</p> <p>1.19 The site is currently being promoted by the owner of the site. It is being marketed to developers by Mather Jamie, and has received a good level of interest from a number of bidders. In accordance with footnote 11 of the NPPF, the site should therefore be regarded as developable at the present time, although this could change to deliverable during the Local Plan preparation process.</p> <p>Summary and Conclusions</p> <p>1.20 The above representations can be summarised as follows:</p> <ul style="list-style-type: none"> • To ensure the Local Plan is sufficiently flexible, Charnwood Borough Council should plan for a higher amount of housing than the 8,100 proposed at paragraph 4.4 of the consultation document; • The Council should plan for development in rural areas, which is supported by government policy; • It is appropriate for Wymeswold to be designated as an 'Other Settlement', however additional weight should be given to the fact that the village has a convenience store catering for day-to-day essentials, has an outreach post office and is approximately 30 minutes by bus to the centres of Loughborough and Melton Mowbray. An hourly service should be regarded as a regular service for a rural location in line with paragraph 29 of the NPPF; • Land at East Road, Wymeswold should be considered as a potential housing allocation. <p>Further documents/information submitted with representation ref: TLP/86</p>	
TLP/87	<p>PSH 80 - Land off Church Road (Formerly known as Butchers Lane) - up to 56 Houses</p> <p>I am sure that you will have received many generic responses to this consultation but I would ask that you consider the following comments which I presented in April 2015 with reference to a planning application to build nine dwellings in the area covered by PSH 80. All the objections raised then are still applicable today, indeed they are exacerbated by the proposal to build six times as many dwellings (56).</p> <p>Planning Application P/14/2382/2 – Outline Planning Permission for 9 dwellings off Church Road (Butchers Lane) Wanlip</p> <p>REASONS FOR OBJECTION</p> <p>General – Wanlip is an ancient settlement, a rural enclave, mentioned in the Domesday Book which has</p>	<p>We note your comments with respect to the land off Church Road, Wanlip.</p> <p>No decisions have been made at this stage about the preferred approach. No decisions have been made at this stage about any sites and their suitability for allocation in the Draft Local Plan as residential sites.</p>

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	<p>been declared an unsustainable settlement – i.e. unable to support further development i.e. no schools, shops, doctors in the village etc.</p> <p>Note: Where Church Road turns south into the lane leading to the proposed site of this planning application, this lane was formerly known as Butchers Lane, a term still appearing in other planning documents and in common speech amongst local residents. The planning application and supporting documents can be viewed at: http://pap.charnwood.gov.uk/PAP/index.asp and then type in: P/14/2382/22</p> <p>SUMMARY OF KEY POINTS</p> <ul style="list-style-type: none"> • If this application to build alongside Church Road/Butchers Lane is successful, it has woeful implications for residents in all parts of the village • There are currently just 70 houses in the village (73 in the whole parish). Nine new properties would represent more than a 10% increase. • Site lies outside the Village Envelope – any breach of the envelope will set a precedent for further inappropriate development • Proposal contrary to the aims outlined in Charnwood’s Core Strategy <ul style="list-style-type: none"> · Village Envelopes – site outside envelope · Areas of separation (between settlements – Wanlip & Birstall) · Small Hamlet Protection – protecting identity · Development in the Countryside · Development in sustainable locations identity • Butchers Lane cannot provide adequate access - too narrow, parked cars, dangerous corner • Increasing Flood Risk – too close to flooding line; loss of area of soakaway. • Sewage Inspection Hatch/Ventilation point adjacent to the site • Loss of high grade agricultural land and wildlife Habitat <p>1. NATIONAL POLICY</p> <p>Meeting the nationally defined need for more housing & pressure on Charnwood to provide</p> <ol style="list-style-type: none"> a. There are still houses for sale from the Hallam Fields site b. The proposal to build a further 1650 houses on the Wanlip Hill site (Bentley’s Sheds) is already featured in Charnwood’s Core Strategy. c. Adding a further nine houses would be both insignificant and unjustified d. Wanlip has already contributed significantly to new development, largely to provide services for the wider community: <ol style="list-style-type: none"> i. Sewage works for Leicester ii Schools for Birstall iii. Park & Ride for Charnwood/Leicester iv. A46/Western By-pass for Leicester 	<p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation which will be published for consultation and be accompanied by an appropriate range of evidence, and supporting documents.</p>

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	<p>v. Hallam Fields vi. Wind Turbine for Severn Trent vii. Proposed 1500 houses at Wanlip Hill (Bentley's sheds quadrant)</p> <p>See Appendix A – Enough is Enough</p> <p>2. BOROUGH-LEVEL POLICY Charnwood's Core Strategy statements The village has been protected by the planning policies of Charnwood including statements in the Charnwood Local Plan 2006 to 2028 Core Strategy as follows:</p> <p>a. Village Envelopes This is a line drawn around the boundaries of the gardens within the village. See Appendix B – Wanlip Village Envelope</p> <ul style="list-style-type: none"> i It has declining strength under planning legislation but nevertheless, currently defines the planning boundaries for the village. ii. Wanlip village is surrounded by largely absentee landowners eager to develop. See below Point 3 below. Strategic Housing Land Availability Assessment iii. Any settlement outside the envelope will set precedent attracting applications all around the village <p>b. Areas of Separation.</p> <ul style="list-style-type: none"> i. The proposed site lies in the area of separation between Wanlip & Birstall ii. Already a planning precedent in relation refusing planning permission to build in this area of separation i.e. the plans to build a bungalow in the paddock adjacent to Rectory Fields Nursery. iii. Provides a green walking area for the adjacent dense residential area in Birstall. <p>c. Small hamlet protection. (Strategic Objective 9, to protect the historic environment and identity of the Borough's locally distinctive town, villages and neighbourhoods.) Wanlip is recognised as a unique semi-rural settlement.</p> <p>d. Development in the countryside</p> <ul style="list-style-type: none"> i The proposed site lies in open countryside where planning permission is rarely granted except for: ii. Housing for agricultural workers - One exception for development in the countryside is to meet local demand for housing for agricultural workers. This need was tested recently when the owner of the bungalow on the site of Rectory Fields Nursery (which has an agricultural tie upon the bungalow) was required to test the market by offering the property for sale, for a whole year, to establish if there was any current need for housing for an agricultural worker. There were no 	

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	<p>buyers for this property.</p> <p>iii. Small Schemes of affordable housing</p> <p>1. Given the proximity of affordable housing existing and proposed in Hallam Field and 'North of Birstall', such a development could not be justified off Butchers Lane.</p> <p>2 The type of houses in the outline proposal are unlikely to be deliverable at affordable prices.</p> <p>e. Development in sustainable locations.</p> <p>i. Wanlip has been declared an unsustainable settlement i.e. it has no shops, schools, employment doctors surgery etc and is therefore considered unsuitable for further development.</p> <p>ii. The planning applicants refer to the original Wanlip Parish Plan 2005 as out of date but a recent 2014/15 review of this plan has been prepared. This adds recent up-dates but also reaffirms the validity and currency of much of the 2005 document.</p> <p>iii. To claim that the village is well supported by local services, without the dependence upon a car e.g. by using Supermarket grocery deliveries this suddenly makes the settlement sustainable is a nonsense.</p> <p>iv. Also, to claim that the village is served by 10 primary schools when they are as far afield as Thurmaston & Syston is equally ridiculous.</p> <p>3. SHLAA – Strategic Housing Land Availability Assessment for land in the Parish – See attached Wanlip SHLAA & Wanlip SHLAA Plans</p> <p>a. Annually, Charnwood Borough Council are required to contact owners of land adjacent to existing settlements to assess their willingness to develop their land. Any proposed land is assessed for it's development potential and this is published in SHLAA. It is important to stress that this is only a nominal, preliminary assessment and does not automatically mean that it will lead to development</p> <p>b. However, SHLAA does provide an important alert and the context for reviewing individual planning applications, particularly ones which are sited outside the Village Envelope, where the granting of planning permission could set undesirable planning precedent.</p> <p>c. It states that a potential site is assessed according to Suitability, Availability and Achievability – See criteria in attached document SHLAA 2012 – Main Report Pt. 4.11</p> <p>4. SITE SPECIFIC</p> <p>a. Vehicular access – no capacity, no potential for widening and potentially very dangerous</p> <p>i. The proposed site abuts an ancient right of way that formerly connected Rothley to Leicester via Wanlip & Birstall</p> <p>ii. There is a blind corner (by number 17 - Phil & Monica Walling's) where the former Butchers Lane meets Church Road</p> <p>iii. There has already been one accident of sufficient impact for a car bumper to fall off – the next could involve a child on a bicycle</p>	

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	<p>iv. The access road is too narrow with & further reduced by parked cars due to:</p> <ol style="list-style-type: none"> 1. already short drives to properties in that part of Church Road , formerly known as Butcher's Lane 2. people working from home <p>v. There is no scope to widen between existing properties</p> <p>vi. After the tarmac area the lane is single track to the south, adjacent to the proposed site and road widening scheme would result in loss of ancient hedgerow</p> <p>vii. The lane is in common and frequent use by pedestrians and horse riders accessing Wanlip Meadows and Watermead Country Park.</p> <p>b. Loss of Amenity for adjacent residents</p> <ol style="list-style-type: none"> i. Dangerous – not room to create a visibility splay at the entrance to existing drives ii. Increased noise and congestion from a potential 18 additional cars plus those of visitors iii. Loss of existing sight-lines over open countryside iv. Diminishing the non-estate street view of the existing linear development of mainly detached houses <p>c. Flood plain/area of flooding.</p> <ol style="list-style-type: none"> i. The site lies within metres of a zone defined by the Environment Agency as likely to flood ii. Any additional concrete, tarmac, building development would increase run-off in an already sensitive area. iii. There is photographic evidence of standing water in large areas of the field. <p>d. Severn Trent Sewage inspection hatch/ventilation shaft</p> <ol style="list-style-type: none"> i. This is located in the field adjacent to the proposed site. There is a requirement to maintain access to this hatch and an area of easement (no building allowed above this area) five metres either side of the centre of the associated pipes. The pipe passes close-to/under the proposed site. <p>e. Environmental issues</p> <ol style="list-style-type: none"> i The whole field is an important area for bird life and ground feeding birds ii. There is a well-established, solo ash tree, immediately adjacent to the proposed site – important in view of incidence of ash die-back disease; extensive roots into site iii. Close proximity to Wanlip Meadows and provides additional, important habitat for badgers etc feeding for House Martins, Swallows & partridges and bats. <p>f. High grade agricultural land</p> <ol style="list-style-type: none"> i. The field formerly provided grazing for a large milking herd; currently arable. ii. Offers great potential for growing bio-mass - renewable energy <p>I also attach a plan illustrating how much of the parish of Wanlip has already been taken out of agriculture to support developments, largely benefiting the wider community. Since the early 1960s, this represents more than 50%the land area. When Broad Nook, 'North of Birstall', is approved and fully implemented, this will represent 75% of the Parish of Wanlip.</p>	

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	<p>I therefore ask that this and other objections on file relating to this recent, specific planning application be considered when reviewing proposals for future development in the Parish of Wanlip.</p> <p>Further documents/information submitted with representation ref: TLP/87</p>	
<p>TLP/88 Hinckley & Bosworth Borough Council</p>	<p>Status HBBC note that the status of the primary document being consulted on is as a discussion paper, not a draft Local Plan and as such HBBC look forward to continued dialogue and consultation as the Local Plan work develops. Notwithstanding this, it is noted that emerging evidence base documents which will directly impact on future Local Plan documents also form part of this consultation and a such HBBC have reviewed those of relevance in formulating the below comments.</p> <p>Duty to Co-Operate HBBC would like to confirm there are no concerns in relation to Charnwood Borough Council (CBC) meeting the Duty to Co-Operate with ourselves. In particular, HBBC welcomes the opportunity to engage at this discussion stage of Local Plan work and consider it to be a productive and positive approach.</p> <p>Plan period and objectively assessed housing needs The discussion paper makes clear that a new Local Plan will deal with the period up to 2036. It also acknowledges the need for 994 dwellings within the borough per annum. Both of these key elements are in alignment with the emerging Strategic Growth Plan (SGP) for Leicester and Leicestershire and informed by the shared evidence base document Housing and Economic Development Needs Assessment 2017. In view of this and the fact that the SGP, once completed, will amount to a shared and agreed statement of broad development intentions across the County, HBBC are pleased to see alignment at this early stage.</p> <p>Spatial strategy The discussion paper presents a good range of options for further investigation and testing in evidence. Those included appear to present a broad and varied set of approaches and thus a range of reasonable alternatives are available for consideration as part of the Local Plan production. In terms of selecting the most sustainable and justified approach to take forward in the new Local Plan, this will be a matter for evidence to inform. We note that the Interim Sustainability Appraisal (SA) finds that all of the options within the discussion paper are 'reasonable' options. Notwithstanding this, of key focus to HBBC will be the potential impact on infrastructure – including on services supporting existing settlements and the strategic road network (specifically the M1, A46 and A50).</p> <p>Green Wedge The Rothley Brook Meadow Green Wedge designation crosses between Hinckley & Bosworth, Charnwood, Blaby and Leicester City authority areas. It is important therefore to consider implications of potential changes to the Green Wedge arising from individual reviews on the designation as a whole.</p>	<p>We note your response and welcome ongoing cooperation in developing our policies. The Council will continue to work with the other Leicester and Leicestershire Housing Market Area authorities under the duty to cooperate. We welcome ongoing cooperation in developing our policies.</p> <p>We note your comments on the adopted Site Allocations and Development Management Policies DPD and the Green Wedge Review.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation</p> <p>Sustainability Appraisal We note that Hinckley and Bosworth Borough Council considers development options presented for consultation and for sustainability appraisal represent a broad and varied set of approaches and thus a range of reasonable alternatives are available for consideration as part of the Local Plan production.</p>

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	<p>HBBC note that in 2016 CBC carried out a Green Wedges and Areas of Local Separation Review, and that this will form part of the evidence base for the new Local Plan. The review indicates that the Green Wedge within Charnwood authority area will be largely retained. In exception to this, the review recommends the removal of zones of weakness to the south and east of the A46. In determining the designation in the new Local Plan and interpreting recommendations from the review, HBBC consider it imperative that the integrity of the wider Green Wedge designation is not undermined, particularly in relation to the area around Groby, Glenfield and south of Anstey. We note that the review document itself recognises the importance of this and therefore at this time HBBC support the approach.</p> <p>We note that the Methodology and Assessment Findings Report references HBBC's 'emerging' site allocations document and that the latest Green Wedge Review referred to is the one carried out in 2011. Whilst we recognise an evidence document must take a point in time, it is important to note that the Site Allocations and Development Management Policies DPD was successfully adopted in July 2016. In addition to this, a new Green Wedge Review is currently being undertaken. For the purposes of clarity and cross-boundary working, it will be important that recognition for these updated positions are reflected in some form as the new Local Plan is developed. Indeed updated recommendations which might emerge from our own Green Wedge Review may have implications for the wider designation.</p>	
<p>TLP/89 Leicester City Council</p>	<p>Thank you for consulting the City Council on the Local Plan Discussion Paper. The City Council supports the commencement of work on a new local plan for the borough, and we look forward to assisting you through the development of the plan. We have the following comments to make at this stage.</p> <p>Cross-boundary planning The City Council welcomes the reference to the Strategic Growth Plan and joint working across the housing market and functional economic area of Leicester and Leicestershire. The City Council is fully supportive of effective, co-operative joint working across the sub-region to assist and manage the delivery of planned growth across the Leicester and Leicestershire area.</p> <p>We support the general principles in paragraph 2.3, set out below, however the remainder of the document as a whole makes limited other reference to addressing the housing and economic growth of the wider Housing Market Area (HMA).</p> <p>'The Charnwood Local Plan will take account of the Strategic Growth Plan. The role Charnwood plays in delivering the wider vision for Leicester and Leicestershire and helping to meet the needs of the wider housing market will be considered with our partners and the options tested through the sustainability appraisal process.'</p> <p>As you are aware Leicester City Council has formally declared an unmet housing need arising within its administrative area. The tightly drawn administrative boundary of the City, and lack of suitable and available land for housing within it means that it will not be possible to fully accommodate all of the</p>	<p>We note your response and welcome ongoing cooperation in developing our policies.</p> <p>We note your comments on unmet housing and employment need and cross boundary infrastructure provision. The Council will continue to work with the other Leicester and Leicestershire Housing Market Area authorities under the duty to cooperate.</p> <p>The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be accompanied by an appropriate range of evidence, and supporting documents including an update to the retail assessment,</p>

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	<p>housing need set out in the joint Housing and Economic Development Needs Assessment 2017 HEDNA (or through the proposed standard methodology as set out in the draft NPPF).</p> <p>While the scale of the unmet need has yet to be formally quantified it is expected to be significant. This will be refined as the development of the City's own local plan progresses.</p> <p>Therefore the City Council will expect emerging local plans within the HMA to respond positively to addressing unmet need arising within the HMA, in line with the proposed Memorandum of Understanding on housing needs currently being prepared jointly by the Leicester and Leicestershire authorities.</p> <p>Employment land The Paper, at paragraphs 3.7 and 4.51-4.60 confirms that there 'is sufficient land with planning permission or committed in the Core Strategy to meet the overall quantitative need for employment land' (based on the 2018 Employment Land Review).</p> <p>However it is the view of the City Council that this statement is somewhat misleading, as the underlying reason for the sufficient supply of employment land has not been fully explained through either the 2018 Employment Land Review or the discussion paper.</p> <p>The Leicester City Council 2006 Employment Land Study, and the subsequent HMA employment land study (PACEC 2012/2013), identified that there was insufficient employment land supply within the administrative boundary of Leicester City, particularly for B2 use (specifically to replace the oldest of the City's stock).</p> <p>It was concluded that 50ha of B2 employment land should therefore be provided elsewhere in the HMA, located close to the City's boundaries, to meet the City's unmet employment land needs. The PACEC report set out that Blaby and Charnwood should provide an additional 25ha each to address this need. This was then subsequently included within the 2013 Blaby Core Strategy and 2015 Charnwood Core Strategy.</p> <p>This explains why the Borough has a large supply of employment land allocated, and does not need to allocate significant new land, as it is proposed to 'utilise' the additional 25ha supply (which was designated to supply the City's needs) to meet its own needs until 2036.</p> <p>The land in Charnwood (North East of Leicester SUE) is not expected to be developed until the latter stages of the plan period) whilst the land in Blaby has now mainly been taken up for strategic B8. Therefore no provision for the City's unmet employment needs has actually been developed out for B2 uses in either Blaby or Charnwood.</p>	<p>transport assessments and open space and recreation assessments.</p>

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	<p>The City Council are considering allocating new employment land through its new Local Plan. Consultation has recently ended on an 'Emerging options' document however the Local Plan is not yet sufficiently advanced to be in a position to declare a formal unmet need for employment. The City's evidence base (2017 Employment Land Study) recommends that 45ha of new employment land will be needed in the City, and that there is strong current demand for employment buildings - the City has a vacancy rate of only 3% of floorspace in 2016 (not just of units; see section 3.5.3, page 38 of Leicester's 2017 ELS). This is considerably lower than the 13.8 % vacancy of floorspace identified in para 4.110 of Charnwood's Employment Land Review. It is strongly recommended that an additional potential 4th option is included for Charnwood's employment strategy, that:</p> <ul style="list-style-type: none"> • An additional 25ha of employment land is designated, over and above Charnwood's employment land need; which can be demonstrated to be deliverable in the early part of the plan (in the next 5 years); and which is close to the city's boundaries; to supply for B2 uses which provide for the City's employment needs. <p>Infrastructure</p> <p>Chapter 4 sets out the potential development strategy options for the plan. Paragraph 4.11 states that 'Most of the potential strategy options seek to maximise capacity on the edge of Leicester in recognition of the City's focus for jobs, and higher order facilities within Leicester and Leicestershire'.</p> <p>Paragraphs 2.2 to 2.3 note the role of the Strategic Growth Plan which supports an infrastructure led approach to development, and that the Charnwood Local Plan will take account of the Growth Plan. Given the range of sites being proposed/assessed in this document, in particular the focus on the edge of Leicester, it is important that a key theme should be the assessment of cross boundary infrastructure, and that this is prioritised as a key partnership objective with the City Council. Particular consideration will need to be given to educational facilities required to support new development.</p> <p>The Housing Delivery Study, which forms part of the evidence base supporting the emerging local plan, contains a chapter on Strategic Infrastructure Deliverability. There is no reference to working with the City Council. Appendix C should not focus specifically on site specific infrastructure and the eventual Local Plan should seek to identify key cross boundary issues and mitigations.</p> <p>We would wish to work closely with Charnwood on development proposals on or close to the city boundary, not only to ensure appropriate infrastructure and facilities etc are provided, but also that any proposed development would integrate effectively with existing and potential future planned development in the area.</p> <p>Other issues</p> <p>A number of the documents in the evidence base, such as the Retail Study are becoming dated and will need to be updated to inform the emerging local plan.</p>	

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	<p>We would expect that the plan (and supporting evidence base) will consider the broader range of cross boundary implications for planning. For example, the City Council's adopted Playing Pitch Strategy shows that there is an undersupply of high quality cricket pitches in the City. It also shows that some clubs originating from Leicester City are currently using cricket pitches in Charnwood. Therefore the City Council requests that the provision of sporting facilities and the associated cross boundary implications are fully considered during the Local Plan process.</p> <p>Highways The following comments represent Leicester City Council as the Local Highway Authority.</p> <p>In principle, we support development of concentrated urban expansion which contributes towards the delivery of major transport infrastructure that will transport people coming into Leicester.</p> <p>We are keen to understand any wider transport impacts of the Local Plan by using robust transport modelling. This will need to include modelling on the City's highway network. Any adverse impacts identified on the city's highway network may be subject to mitigation measures required to support this new growth. For example:</p> <ul style="list-style-type: none"> • Contribution towards improvements to strengthen and enhance existing public transport links and infrastructure (including park and ride and rail services) that will provide sustainable services and to reduce the reliance on car journeys • Contribution towards SMART technological transport improvements and highway infrastructure improvements along Leicester's radial corridors. These areas may include A6 (Abbey Lane), A607 Melton Road, Anstey Lane, A50 Groby Road and the A46. <p>Mitigation measures may be required, based on robust evidence, to prevent any rat running and alleviate any flooding related issues along the Soar Valley flood plain area that could impact the performance of the A6 corridor. Alternative routes may carry an increased volume of traffic (when this route is flooded) and this will have impact on the A46 corridor, particularly with traffic entering Leicester on already congested routes.</p> <p>Draft proposals have been put forward in Strategic Growth Plan which includes major infrastructure improvements. This includes a new link road to the south and east of Leicester connecting to the A46 north. This proposal will be an important theme to consider in the development of the transport evidence base. Alongside this, Midlands Connect is currently undertaking a study to look at the role of the A46. Again, it would be useful to consider the outcomes of the study as part of the development of the transport evidence base.</p> <p>We would also encourage discussions with Highways England (if not already done so) due to their role in managing and maintaining the A46 as well as the M1 if a site for new employment land is identified</p>	

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	<p>for large warehousing. It is important to note that the M1 is heavily congested at peak times, which restricts access to Leicester. An assessment of the impact of HGV movement from the development site may be required as part of the development of the transport evidence base.</p> <p>Finally, we recognise the early stage of development of the Local Plan and we will provide, where necessary, more detailed comments as the plan develops. The City Council look forward to working with the Borough to progress their plan, and address HMA wide planning issues.</p>	
TLP/90	<p>At the N.W. Leics. local plan examination I raised - & got virtually nowhere w/ - the notion of if development occurs then to mitigate countryside aesthetics - pluses re biodiversity and carbon-savings too - look to de-'urban'ize elsewhere through decreasing lighting. To this; I remember Leicestershire in the 1970s when places like Quorn /Mountsorrel /Rothley were, it seemed, pretty villages (- and on from that most of my schooling was at Loughborough). Presently, for seven years now, my somewhat-sustainable work-journey to Leics takes me back through Charnwood, and North West Leicestershire; unnecessary, o.t.t. and insensitive lighting is noted, examples: the stretch on the Fosse Way [near Park Hill Lane Seagrave], the stretch north of Junction 23 [M1], the stretch near Quorn Lodge [A6]; also at Charnwood Edge Business Pk [- Northgate' -] an example of obtrusive lighting that mars a wider countryside (fringe) area. You'll say that some of this is down to Highways England or County Council highways; conversely however there are examples en route where it appears lighting is able to be minimized instead. In planning, sometimes sadly, there'll be change (- though e.g. at Birstall and Wanlip it's not difficult to see the pieces of planning used to blemish). A safety-balanced, local planning policy written-in approach on lighting with regard to the above should also include local planning authorities exerting environmental pressure on, challenging, the highways authorities, when endeavouring to protect 'the heart of rural England'. On suggested PSH123 & PSE123 I'm opposed.</p>	<p>We note your concerns with respect to the provision of lighting at various locations in Charnwood. This will be considered as we prepare the Draft Local Plan which will be published for consultation.</p>
TLP/91	<p>I thank you for the latest iteration of the local plan, which compared to the previous one seems to recognise the need for new house-building outside the main urban areas.</p> <p>My remaining concerns are that it still does not adequately address the needs of young people and people on low incomes. In this long and painful age of austerity, with no end in sight, the big inescapable costs are housing, energy and transport. To this end I implore you to add these features to your local plan:</p> <ol style="list-style-type: none"> 1. Please remove all restriction to HMOs. Let the market decide how many and where they are. In the past, HMOs in Loughborough were usually occupied by students. Now Loughborough University has a lot more accommodation on the campus and I do not expect any more 'taking over' of areas of town by students. Going forward, I would expect HMOs to be occupied mainly by non-students. 2. The plan says nothing about the type of housing. Most new housing that gets built at the moment is mock Georgian or Victorian. It is all built brick-by-brick and still fails to meet Passive House standards of insulation and energy efficiency. There are very few solar panels on their roofs either. Why is housing design stuck in the 20th century? Or from the point of view of style it is stuck in about 1840! Anyway, my 	<p>We note your comments on the needs of young people and people on low incomes, HMOs, housing design and sustainable transport.</p> <p>Although the Local Plan is a spatial plan which is concerned with the use of land we recognise that our policies and proposals impact directly on the lives of sectors of the community. To this end an Equality Impact Assessment will be undertaken as part of the plan preparation process.</p>

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	<p>point is there are much better ways of building houses. For example: https://www.dezeen.com/2018/04/30/tv-presenter-george-clarke-tdo-prefabricated-fab-houses/ (By the way, they do not have to be grey. They can be any colour you like) https://www.bbc.co.uk/news/uk-wales-38523043 And some people like living in Tiny houses, or even trailer parks, and other cost-effective housing solutions. https://en.wikipedia.org/wiki/Tiny_house_movement Let's not have a one-size-fits-all housing policy (ref ' Little Boxes', https://www.youtube.com/watch?v=2_2IGkEU4Xs) even though, ironically, the little boxes we have are not boxes but faux-Georgian houses.</p> <p>3. There just are not enough safe cycle routes, anywhere outside of the Western side of Loughborough. On the East side of Loughborough I see the Nottingham Road has recently been resurfaced with loose stone chips that get fired up at my face by passing cars. The painting of bicycle symbols on the road does not make it a safe cycle route! Much more is needed: More off-road cycle routes and bridges / crossings linking back-road areas. We also need a lot more rural cycle routes. Deaths-per-million-miles-of-cycling are much higher on rural roads than urban roads, and higher on urban main roads than back roads or off-road routes. Cycling on rural roads just feels incredibly dangerous at night. Many rural roads don't even have a footpath. Come on! Spend more on walking and cycling routes. Rural roads need an off-road cycle way and an off-road footway.</p> <p>4. Build a bus station with free-of-charge public toilets like we used to have. Why oh why did you build the Rushes shopping centre? Or the Cineworld complex? You can see by the dozens of empty shops in our town centres that there is a surplus of retail space. I know from experience that visitors to Loughborough have a terrible job knowing which bus stand to wait at to catch a bus anywhere. The planned housing areas are all well but they need to be connected by usable bus and cycle routes.</p>	<p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p>
<p>TLP/92 GVA Grimley Ltd on behalf of St Philips</p>	<p>1. Introduction</p> <p>1.1 GVA is instructed by St Philips to make representations to Charnwood Borough Council's ('the Council')</p> <p>'Towards a Local Plan for Charnwood' Issues and Options consultation document ('the consultation').</p> <p>1.2 St Philips has interest in the land at Cotes Road, Barrow-upon-Soar ('the site') shown on the Location Plan appended as Appendix I.</p> <p>1.3 The existing Charnwood Core Strategy covers the period 2011 to 2028 and requires a review to, amongst other things, identify additional land for housing to meet the needs of a growing population.</p> <p>1.4 The Leicester and Leicestershire Draft Strategic Growth Plan (SGP) (2018) alongside the Leicester and Leicestershire Housing and Economic Development Needs Assessment (HEDNA) (2017) considers</p>	<p>Sustainability Appraisal</p> <p>We note your references to the Sustainability Appraisal and your question about how air quality has been assessed at the higher level of growth.</p> <p>We note your comments with respect to land at Cotes Road, Barrow upon Soar and the need to provide for housing. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having</p>

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	<p>housing needs across the wider Housing Market Area (HMA), and identifies a requirement of 117,900 dwellings through the period 2011 to 2036, of which 24,850 are to be provided in Charnwood.</p> <p>1.5 Notwithstanding this, Leicester City Council and Oadby & Wigston Borough Council have declared that they will be unable to accommodate their future development needs within this period, and it is our understanding that there is a collective shortfall across the HMA of circa 25,000 dwellings. Therefore, additional land will be required. It is in this context which the land at Barrow-upon-Soar is promoted for residential allocation through this consultation.</p> <p>1.6 In reviewing the existing spatial strategy through this consultation, the Council are considering several options to accommodate this future growth. These representations respond to these options along with other subjects raised within the consultation. Responses are only provided to the subject matters which St Philips feels are the most critical issues, and are most relevant to their interest in the land at Cotes Road.</p> <p>1.7 These representations are considered to present a robust case for the inclusion of the land at Cotes Road as a residential allocation in the emerging Local Plan.</p> <p>2. Site Context Strategic Housing and Employment Land Availability Assessment (SHELAA) (2017)</p> <p>2.4 The Council will be aware that the site has been the subject of promotion in order to secure its allocation for residential development. The site was included as site PHS280 in the Council's latest SHELAA in 2017, following their 'Call for Site' process.</p> <p>2.5 The SHELAA identified the site as being suitable to accommodate up to 56 dwellings, with strong developer interest in the site.</p> <p>2.6 The assessment stated that there are no known irresolvable physical or environmental constraints that prevent the development of the site and that a suitable access could be achieved.</p> <p>2.7 A Vision Document providing further environmental and technical information regarding the potential development of the site will be submitted following these representations.</p> <p>3. Duty to Co-operate 3.1 Paragraph 178 of the National Planning Policy Framework (NPPF) states "public bodies have a duty to cooperate on planning issues that cross administrative boundaries". It requires cooperation between local planning authorities to "ensure that strategic priorities across local boundaries are properly co-ordinated and clearly reflected in individual Local Plans" (paragraph 179). The Local Plan examination</p>	<p>regard to the full range of planning considerations.</p> <p>These comments will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>will test whether a local planning authority has complied with the duty to cooperate and expect them to “demonstrate evidence of having effectively cooperated to plan issues with cross-boundary impact” (paragraph 181).</p> <p>3.2 In the absence of such effective collaborations, the Local Plan may be found unsound as it would not be “positively prepared” in accordance with the requirements of paragraph 182.</p> <p>3.3 The SGP states that Leicester City Council has declared that it will be unable to meet its housing needs to 2031 and has assumed that neither Leicester nor Oadby & Wigston Borough Council will be able to accommodate their needs to 2036. Whilst much of the need for new homes during this period can be met through development that has been built, has planning permission or is allocated in adopted or emerging local plans, there is likely to be a collective shortfall across the HMA of circa 25,000 dwellings.</p> <p>3.4 The SGP notes that any shortfall can be met through Local Plan allocations in other areas and the distribution of development will need to be agreed between the authorities in Leicester and Leicestershire as a whole. The agreed distribution for the period 2011-2036 will be set out in a Memorandum of Understanding (MoU), expected to be published in summer 2018.</p> <p>3.5 The HEDNA identifies a need for a total of 24,850 new homes in Charnwood between 2011 to 2036, equating to an annual requirement of 994 dwellings. Table 2 of the consultation states that 18,399 homes have been built, granted planning permission or committed through allocations within the Core Strategy, and therefore the Council conclude that an additional 6,451 homes are required to meet the needs for the longer plan period up to 2036.</p> <p>3.6 The Council’s delivery evidence shows that not all homes allocated in the Core Strategy or with planning permission will be built by 2036, meaning they require a minimum of 8,100 homes over this period to meet need. Taking into account changing circumstances and the need to maintain flexibility in their housing supply, the Council suggest that a maximum of 15,700 additional homes will be required.</p> <p>3.7 Whilst the Council have acknowledged that changing circumstances may require them to provide additional housing within their own administrative boundary, there is no acknowledgment of the need for the Council to provide additional housing to address unmet requirements identified across the HMA. We are concerned by the lack of recognition from the Council to accommodate an appropriate proportion of the identified wider HMA shortfall in their housing requirement calculations, as required by the NPPF (paragraph 179).</p> <p>3.8 Unless this is achieved, it is highly likely that the new Local Plan will be found unsound and the Duty to Cooperate will not be met. It is also a risk that, if the Council continues with this approach, the level of housing growth required will not be met, which will have significant adverse impacts across the wider</p>	

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	<p>HMA.</p> <p>3.9 We recommend that the Council amend their growth scenarios to accommodate an appropriate proportion of the wider HMA housing shortfall, to satisfy the Duty to Cooperate test as set out in the NPPF.</p> <p>4. Development Strategy Options</p> <p>4.1 Through the consultation, the Council have proposed a minimum and maximum growth scenario to accommodate their additional housing need over the plan period, ranging from a minimum of 8,100 dwellings to a maximum of 15,700 dwellings. They have set out a range of development strategy options to deliver this future growth.</p> <p>4.2 The view is taken that the Council should aim to provide enough land to accommodate the maximum growth scenario to provide for their own housing needs. The reasoning behind this is set out below.</p> <p>Standard Methodology</p> <p>4.3 In February 2017, the Government published the Housing White Paper “Fixing our broken housing market” (HWP) that sets out its intention to introduce a standard method for assessing housing need. Options for a Standardised Objectively Assessed Need (SOAN) were published in September 2017 in “Planning for the Right Homes in the Right Places” and a consultation was undertaken from September to November 2017. The HWP indicated that the standard methodology would be incorporated into a revised NPPF which is due to be formally adopted in summer 2018. It sets out that plans submitted for examination after 31st March 2018 will need to use the new standard methodology for calculating housing need. This position was confirmed in the letter dated 30 January 2018 from Steve Quartermain, Chief Planner at the Ministry for Housing, Communities and Local Government (MHCLG), sent to Chief Planning Officers at all Local Planning Authorities in England.</p> <p>4.4 Following this, the government published a draft version of the NPPF in March 2018. Whilst this document is still within the draft stages, it is highly unlikely that the final adopted document will defer from the policies set out in the draft version. Paragraph 6.1 states “in determining the minimum number of homes needed, strategic plans should be based upon a local housing need assessment, conducted using the standard method in national planning guidance – unless there are exceptional circumstances that justify an alternative approach which also reflects current and future demographic trends and market signals.” Any deviation from the method which results in a lower housing need figure than the standard approach will be subject to the tests of soundness and will be tested thoroughly by the Planning Inspectorate at examination.</p> <p>4.5 The housing need identified within the consultation is based on data from the HEDNA (2017) which states that 24,850 homes will be required between 2011 and 2036, equating to an annual requirement</p>	

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	<p>of 994 dwellings. The Council recognises that the government intend to adopt a standardised method for calculating housing need, but “do not expect the need for homes to change significantly” [paragraph 3.1].</p> <p>4.6 However, the standard methodology for Charnwood illustrates an uplift in housing need, with a requirement of 1,045 dwellings per annum over the period 2016 to 2026.</p> <p>4.7 The Council have not clearly stated why they should divert from this method and adopt an alternative approach to calculating housing need. Therefore, the new Local Plan for Charnwood will be required to adopt this methodology when establishing their housing need.</p> <p>4.8 The Council have neither chosen to adopt the government’s standard methodology for calculating housing need, nor clarified why this should not be the case, as required by emerging national planning policy. If the Council continue with this strategy, the level of housing growth required in Charnwood will not be met which may result in a chronic housing need and compound affordability issues. In addition, the new Local Plan will be at risk of being found unsound by the Planning Inspectorate during examination, should the Council not be able to justify their proposed housing need over the Plan period.</p> <p>4.9 We recommend that the Council revise their housing need targets to reflect the annual requirements as set out in the government’s Standard Methodology, to ensure that the Plan is based on the most up to date Objectively Assessed Need (OAN).</p> <p>Five Year Housing Land Supply</p> <p>4.10 As of March 2017, the Council is unable to demonstrate a five year land supply and states that approximately 4.6 years supply is available. However, this position does not take into account the most up to date Objectively Assessed Need set out in the standard methodology, nor any agreed Duty to Cooperate allocation intended to meet the needs of the City of Leicester or Oadby & Wigston, which may be agreed in the coming months.</p> <p>4.11 We have estimated the Council’s five-year housing land supply based on the OAN set out in the standard methodology (see Table 4.2 below). This calculation demonstrates that the Council have approximately 3.6 years supply available.</p>	

Table 4.2: Charnwood Borough Council 5 Year Housing Land Supply, including standard methodology

Housing Supply Estimate as at 31 st March 2017	Total
Total completions (2011-2017)	4,259
Housing Requirement Completions (2011 to 31 st March 2017)	$(820 \times 5) + 1,045 = 5,145$
Surplus / shortfall	-886
Sedgefield Requirement for 5 years (2017-2022)	$(5 \times 1,045) + 886 = 6,111$
Requirement for 5 years plus 20% buffer	7,333
Expected supply of deliverable sites	5,350
Surplus over requirement	-1,983
Number of years supply	3.6 years

4.12 This amplifies the Council's need to provide additional housing land, and supports the view that the maximum growth scenario should be adopted going forward.

Environmental Constraints

4.13 It has been established through these representations that there are concerns Charnwood has underestimated its housing need over the plan period. It is recommended the Council amend their housing requirements to take into account the need identified within the SOAN, reflect the Council's responsibility to accommodate unmet housing need from the wider HMA and satisfy the Duty to Cooperate.

4.14 Notwithstanding this, the consultation outlines the challenge in balancing the impacts of additional housing on the environment, with the ability to provide flexibility in the supply of land. Paragraph 4.12 of the consultation goes on to state that the Council have not been able to "consider an option which meets housing need purely through development on brownfield land due to a lack of sites. For that reason, all the options for housing development would have significant negative effects on soil resources and a negative effect on mineral resources in the Borough."

4.15 Whilst St Philips fully understands that there may be negative impacts resulting from development, it is contended that there are no major environmental constraints that prevent Charnwood from delivering the maximum growth scenario.

4.16 Table 4.3 shows a revised 'Housing Need and Land Supply', taking into account figures from the SOAN.

Table 4.3: Charnwood Housing Need and Land Supply 2011-2016 (with standard methodology)

	Number of dwellings
Housing Need (2011 - 2015)	4,970
Housing Need (2016 - 2036)	20,900
Total housing need	25,870
Completions (2011-2017)	4,259
Planning Permissions (at 31 st March 2017)	9,280
Allocations (Core Strategy)	4,860
Total housing supply	18,399
To be found	7,471

4.17 This calculation shows a need of an additional 1,020 dwellings to be found over the plan period, equating to an additional 51 dwellings to be found per year up to 2036. Whilst this uplift will require additional sites to be found, it is contended that this increase will not be so sharp as to cause detrimental effects to the environment and landscape character of the Borough.

Sustainability Appraisal (April 2018)

4.18 The Council commissioned a Sustainability Appraisal (SA) to predict what effects a plan could have on the environment, the economy and on communities. This SA has assessed the potential impacts of the two proposed levels of housing delivery identified in the consultation, 8,100 dwellings (Scenario A) and 15,700 dwellings (Scenario B), and the Council's approaches to distribution. A further Scenario C was identified to explore the potential for a large standalone settlement.

4.19 A summary of the results of the SA are detailed below:

Landscape

4.20 The SA raised concerns that at Barrow-upon-Soar, development could encroach into the surrounding countryside. However, it notes that it would be possible to accommodate modest growth and avoid significant effects for some of the service centres under Scenario B, given the availability of less sensitive land.

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	<p>Biodiversity and Nature Conservation</p> <p>4.21 Whilst there would be unlikely to be direct effects on designated sites in and around any of the service centres, growth along the Soar Valley (within which the site is located) could potentially disturb species movement and impact the wildlife corridor function of this area of the Borough.</p> <p>4.22 The potential for significant negative effects therefore exists, but “it ought to be possible to mitigate effects by ensuring that growth implements green infrastructure” [page 61].</p> <p>Water Quality</p> <p>4.23 Growth in service centres could exacerbate potential effects on water quality, particularly during construction. In the longer term, however, the effects are unlikely to be significant as water infrastructure would need to be upgraded.</p> <p>4.24 In addition, where actively used agricultural land is changed to residential uses, this could have positive effects upon water quality due to less run-off nitrates. Implementing sustainable drainage systems should also help to ensure that increased hardstanding does not lead to more surface water pollution.</p> <p>Flooding</p> <p>4.25 Within Scenario B, the likelihood of sites being within areas at risk of flooding does increase substantially, however, this could be more difficult to manage in terms of surface water drainage.</p> <p>Oil Resources</p> <p>4.26 Scenario B would result in a loss in agricultural land, which is considered to be negative from a soil resources perspective.</p> <p>Air Quality</p> <p>4.27 Under Scenario B air quality is not anticipated to be significantly affected in the service centres themselves, however it would lead to an overall increased in car trips which could contribute to air quality issues in more sensitive areas.</p> <p>4.28 It is unclear whether the higher level of growth would have a significantly worsening effect on air quality.</p> <p>Climate Change</p> <p>4.29 The increased amount of growth under Scenario B at Service Centres in particular, could help to create a critical mass to support new facilities that improve accessibility and reduce the need to travel, thus helping to lessen the effects of climate change.</p> <p>Historic Environment</p>	

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	<p>4.30 Growth throughout the Soar Valley is likely to have greater potential to affect areas of potential archaeological importance. At Barrow-upon-Soar, however, none of the site development options are in locations that would lead to significant effects upon the character of the settlement or any historic assets.</p> <p>4.31 However, it is important to acknowledge that mitigation, avoidance and enhancement could be secured through accompanying plan policies. Therefore, Scenario B is not inherently significant with regards to historic environment.</p> <p>Minerals</p> <p>4.32 Scenario B would require a greater release of land at each Service Centre. This may result in an uncertain negative effect, as it may still be possible to avoid some areas. Whilst the effects of Scenario B are undoubtedly more negative than those under Scenario A, the effects are still not predicted to be significant, given the total amount of mineral resources available.</p> <p>Population</p> <p>4.33 Whilst the increased level of growth in Scenario B would bring with it higher levels of traffic and potential amenity issues for existing communities, it should also bring more affordable housing and greater contributions to community infrastructure improvements that can help to tackle deprivations.</p> <p>4.34 At the scale of growth under Scenario A, there may not be a critical mass to support the development of new facilities, meaning residents may need to travel further to access services resulting in an uncertain negative effect. Conversely, a higher level of growth could present opportunities to secure local improvements to green infrastructure and open space provision. Consequently, a significant positive effect is predicted in the long term.</p> <p>4.35 Higher growth as part of Scenario B will have significant positive effects in terms of housing delivery, helping to increase the supply of much-needed homes and address affordability issues. Growth at this higher level should provide greater flexibility in the choice of sites, making it more likely that housing need would be met over the plan period. The greater number and types of sites should also ensure that the needs of a variety of communities could be met.</p> <p>4.36 Growth at the level under Scenario B would help to generate jobs for the construction of homes in these locations, whilst also placing new development in settlements with relatively good access to jobs in the larger centres of Leicester and Loughborough. This scenario is more likely to support economic growth, therefore, significant positive effects are predicted.</p> <p>4.37 Scenario B is more likely to have a significant positive effect on accessibility, particularly in Service Centres such as Barrow-upon-Soar.</p>	

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	<p>Overall Assessment</p> <p>4.38 This analysis demonstrates that, whilst the Council are right to consider the impacts of future growth on the environmental and landscape characteristics of the Borough, there are no severe or adverse impacts predicted from the maximum growth scenario to prevent this option from being adopted going forward.</p> <p>4.39 The SA has made it clear that, should any negative impacts arise from this scenario, these could be mitigated through the implementation of various development features such as sustainable drainage systems and green infrastructure.</p> <p>4.40 The SA has also demonstrated that Scenario B is more likely to deliver significant positive impacts to the area, in addition to new housing, such as improved community infrastructure, accessibility and increased economic growth, compared with that expected in Scenario A.</p> <p>4.41 Only 4% of Charnwood land area is covered by Green Belt, National Parks, Areas of Outstanding Natural Beauty or Sites of Specific Scientific Interest, demonstrating that there are no significant exceptional circumstances that should warrant a reduced or minimum housing growth target. It is the view that the benefits associated with the maximum growth scenario will outweigh the minimal impacts on the environmental and landscape characteristics of the Borough.</p> <p>Recommended Option and Growth Distribution</p> <p>4.42 St Philips fully recommends the Council adopt the maximum growth scenario of 15,700 dwellings over the plan period. This will assist in meeting the additional housing need required through the SOAN. It will be critical, however, that the Council also fully commit to accommodating a proportion of the unmet need from the wider HMA, where this is agreed through the MoU, and ensure the plan is compliant with the Duty to Cooperate test, as set out in the NPPF.</p> <p>4.43 St Philips is of the view that there are no major environmental constraints that inhibit this scenario being carried forward, as demonstrated in the SA.</p> <p>4.44 In terms of distribution of this future growth, the Council have set out a range of development options. For clarity, all options are summarised in Table 4.4 overleaf.</p>	

Table 4.4: Development Strategy Options

Option	Summary
Option 1: Leicester and Loughborough Urban Areas	This option would focus development on the key Urban Areas i.e. urban centres and urban settlements within the Settlement Hierarchy.
Option 2: Leicester and Loughborough Urban Areas and Service Centres	This option would focus development on the Urban Areas with a smaller proportion of development focused on the Service Centres.
Option 3: Settlement Hierarchy Distribution	This option would focus development on the Urban Areas and then Service Centres, with the remainder of development directed to the Other Settlements.
Option 4: Proportionate Distribution	This option would distribute new housing in proportion to the population of each settlement hierarchy tier and would be a more dispersed pattern of development.
Option 5: Leicester and Loughborough Urban Areas and New Settlements	This option includes development of the Leicester Urban Area along with four large sites promoted to the Council which have been categorised as new settlements. The remainder of development would be focused on the Loughborough Urban Area.
Option 6: Leicester and Loughborough Urban Areas, Service Centres and New Settlements	The proposed new settlements do not have sufficient capacity to meet the Council's housing needs. Therefore, this option includes development at Leicester Urban Area, along with Loughborough Urban Area and Service Centres.
Option 7: New Settlements	This option would focus development on a single standalone new settlement with 8,000 to 10,000 new homes.

4.45 St Philips have no objection to the new Local Plan continuing to support new development in and around urban centres (as in Options 1 and 5), given their sustainability credentials. However, as stated within the consultation, these have a finite capacity and will not be capable of releasing all additional land required to address the maximum housing growth scenario.

4.46 This is also apparent through Option 7 (New Settlements) and it is considered that a single standalone new settlement will be unable to provide sufficient capacity to accommodate housing need within the plan period.

4.47 Therefore, a significant proportion of growth will need to be directed towards larger settlements such as Service Centres, which will be able to accommodate additional housing whilst providing sustainable access to key services and facilities.

4.48 Service Centres, such as Barrow-upon-Soar, with good transport links and a good range of services/facilities, will be able to supplement the growth focussed in the Borough's urban centres and will be able to accommodate appropriately sized extensions, mindful of the scale of housing need over the plan period.

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	<p>4.49 Whilst the principle of expanding smaller villages and settlements is supported, the Council must recognise that significant expansions will inevitably be required to the larger settlements, with limited extensions to small villages with poor accessibility and a poor range of services/facilities.</p> <p>4.50 St Philips therefore fully supports the adoption of Options 2 or 3 and believe these to be the most appropriate options which are capable of delivering the Borough's (and wider HMA's) need over the plan period. However, the view is taken that a portfolio of more strategic development sites will be required rather than focussing development in the form of a specific type within a single location.</p> <p>5. Settlement Hierarchy</p> <p>5.1 The consultation outlines the Council's proposed settlement hierarchy. This hierarchy has been based upon the 'Charnwood Settlement Hierarchy Assessment' (2018), published alongside the consultation.</p> <p>5.2 Loughborough remains the social and economic focus towards the north of the Borough and is identified as the 'Urban Centre'. Settlements such as Syston and Thurmaston are identified as 'Urban Settlements', forming part of a wider urban area with Loughborough or Leicester. These settlements benefit from a full range of services and facilities that meet day to day needs, as well as excellent transport links.</p> <p>5.3 Barrow-upon-Soar has been identified as a 'Service Centre', with a good range of services and facilities and good public transport links to Loughborough and Leicester.</p> <p>5.4 Whilst Barrow-upon-Soar has a smaller population than those defined as 'Urban Settlements', it is contended that it has well established foundations of an urban settlement, including access to key services such as a Doctors Surgery, Post Office and a pharmacy, as well as high speed broadband and excellent secondary school access. Crucially, Barrow-upon-Soar benefits from a train station, providing links to surrounding urban centres such as Leicester, Loughborough and centres further afield such as Lincoln and Nottingham.</p> <p>5.5 Further residential development in Barrow will provide additional expenditure into the settlement's economy and may lead to the provision of additional key infrastructure such as schools, local services or improved public transport links.</p> <p>5.6 We recommend the Council recognise the potential impact that future development in Barrow-upon-Soar may have on its settlement status and revise their Settlement Hierarchy to include Barrow-upon-Soar as an 'Urban Settlement' to reflect its potential future growth.</p> <p>6. Settlement Boundary</p> <p>6.1 As part of this consultation, a review has been undertaken of the limits to development for the</p>	

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	<p>settlements in the Borough. This review has established a proposed settlement boundary for Barrow-upon-Soar</p> <p>6.2 As established through these representations, St Philips is of the view that the maximum growth scenario of 15,700 dwellings should be accommodated over the plan period, with a proportion of this growth focussed on Service Centres such as Barrow-upon-Soar. This, therefore, will require the provision of a variety of mixed sized sites, to ensure there is enough flexibility to maintain supply.</p> <p>6.3 The amendment of the settlement boundary to include the site at Cotes Road alone would be impractical and would not be a natural extension to Barrow-upon-Soar. Therefore, it is suggested that the boundary be amended to include the site and the land to the south east (shown in Figure 6.1) to create a natural extension to the settlement and create an opportunity for potential further expansion.</p> <p>6.4 This site, along with land to the south east, is located adjacent to the existing settlement boundary of Barrow-upon-Soar and will therefore provide a sustainable extension to existing parameters. They are not located within the Green Belt and therefore exceptional circumstances will not need to be demonstrated to allow the boundary to be amended.</p> <p>6.5 We recommend that the settlement boundary for Barrow-upon-Soar be amended to include the site at Cotes Road and the land to the south east.</p> <p>7. Development Potential</p> <p>8. Conclusion</p> <p>8.1 These representations contained within this report and submitted on behalf of St Philips seek to support the allocation of land at Cotes Road for residential development. This is subject to a number of observations and recommendations:</p> <ul style="list-style-type: none"> • The Council have neither chosen to adopt the SOAN, nor justify the exceptional circumstances as to why this should not be the case. If the Council continue with this strategy, the level of housing growth required in Charnwood will not be met, and the new Local Plan will be at risk of being found unsound during examination. It is our understanding that there are no exceptional circumstances preventing the Council from adopting this methodology. Therefore, we recommend that the Council revise their housing need targets to reflect the requirements as set out in the SOAN to ensure that the Plan is based on the most up to date Objectively Assessed Need. • There is no acknowledgement within the consultation of the need for the Council to provide additional land for housing to address unmet requirements identified across the HMA, as required by the Duty to Cooperate (paragraph 179 of the NPPF). Unless this is achieved, it is highly likely that the new Local Plan will be found unsound and the level of housing growth across the HMA will not be met. We recommend that the Council amend their growth scenarios to accommodate an 	

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	<p>appropriate proportion of the wider HMA housing shortfall.</p> <ul style="list-style-type: none"> • The Council have proposed a minimum and maximum growth scenario to accommodate their additional housing need over the plan period. It has been established through these representations that the Council should aim to provide enough land to accommodate their own housing needs and fully commit to accommodating unmet need from the wider HMA. There are no significant exceptional circumstances or environmental constraints that should warrant a reduced or minimum housing growth target. It is recommended that Council move forward with the maximum growth scenario. • St Philips have no objection to the new Local Plan continuing to support new development in and around urban centres, however, there is a need for Service Centres, such as Barrow-upon-Soar, to supplement this focussed growth due to the finite capacity of urban centres. Whilst the principle of expanding smaller villages and settlements is supported, the Council must recognise that these will be limited due to their poor accessibility and poor range of services. St Philips fully supports the adoption of Development Strategy Options 2 or 3 to deliver the Borough's (and wider HMA's) need over the plan period. • The consultation outlines the Council's proposed settlement hierarchy which defines Barrow-upon-Soar as a Service Centre. It is contended that Barrow-upon-Soar has well established foundations of an urban settlement, including access to key services and good public transport link. We recommend that the settlement hierarchy be revised to include Barrow-upon-Soar as an Urban Settlement, to reflect its potential future growth. • The Council will need to provide a variety of mixed sized sites to ensure there is enough housing land to accommodate their OAN and to maintain flexibility in their supply. Whilst the site at Cotes Road is located outside the proposed settlement boundary for Barrow-upon-Soar, it can, along with land to the south-east, provide a natural, sustainable extension to the existing parameters, whilst requiring no exceptional circumstances to be demonstrated to allow the boundary to be amended. We recommend the settlement boundary for Barrow-upon-Soar be amended to include the site at Cotes Road and land to the south east. <p>8.2 These representations have highlighted the opportunity offered by the site at Cotes Road, and St Philips is of the view that the site should be allocated for residential development in the new Local Plan. The site at Cotes Road represents a sustainable development opportunity which is able to deliver a wide choice of high quality homes, included much-needed affordable housing for the Borough. The ability to deliver the site within 5 years will help to ensure the Borough is able to meet its objectively assessed housing needs and help to address any shortfall within the wider HMA, in accordance with the requirements of the NPPF.</p> <p>8.3 St Philips hopes that the Council will review the submission and carefully consider the opportunity provided by this site. St Philips wish to be notified of any developments in the preparation of the new Local Plan and of any future opportunities to make representations, or to discuss the Cotes Road site with relevant Charnwood Borough Council officers.</p>	

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<p>TLP/93 Burton, Cotes & Prestwold Parish Council</p>	<p>Further documents/information submitted with representation ref : TLP/92</p> <p>Burton on the Wolds, Cotes and Prestwold Parish Council supports in general terms the Borough Council's "Vision for Charnwood 2028" which builds on recently permitted developments and certain new proposals.</p> <p>However, it is quite clear that considerable weight must be given to the provision of essential infrastructure and services and how they will be funded. These would include roads/pavements, drainage/sewerage, broadband/telecommunications, adequate affordable public transport and healthcare in all its forms.</p> <p>The numbers of homes proposed, as outlined in Appendix D causes us great concern. 2966 homes in "Other Settlements" which includes Burton on the Wolds with 975 specified for a New Settlement in Cotes (Land East of Loughborough PSE 123) and 770 in a New Settlement near Wymeswold in the plan period are considered wildly optimistic and would require major increases in infrastructure to the detriment of the Wolds and existing settlements. Our objections to the previous application for Cotes remain and addressing them would be very challenging.</p> <p>When considering any new significant development to the East of Loughborough a major obstacle will always be the inadequate road system including the restricted entrance to the town via the narrow A60. Furthermore, the roads through Burton on the Wolds and Wymeswold are already totally inappropriate and inadequate for existing traffic, let alone any increase in volume.</p> <p>These comments need to be considered alongside emerging Wolds Villages Neighbourhood Plan which will be going out to public consultation within the next two months.</p> <p>We look forward to being consulted at the next stage of your deliberations.</p>	<p>We note your comments on housing and the need to ensure sufficient infrastructure is in place to service the development. the responses to the consultation will inform the Draft Local Plan which will be published for consultation</p> <p>We welcome the reference to the Parish Council's emerging Wolds Neighbourhood Plan which will set out the community's aspirations for development</p>
<p>TLP/94 Mountsorrel Parish Council</p>	<p>The Parish Council considered the above consultation document at a recent meeting of its Planning and Highways Committee and respond as follows:</p> <ol style="list-style-type: none"> 1. The Charnwood Local Plan Review is to take account of the Leicester and Leicestershire Growth Plan. 2. The Strategic Growth Plan adopts a "Vision for Growth" which is based on what it calls "Shifting the Focus of Development". It identifies strategic growth points. 3. One primary reason for identifying strategic development proposals is explained in the following way: <p>"To date, the majority of new housing in Leicester and Leicestershire has been built on small and medium-sized sites in the City, market towns, villages and rural areas. Some of this development has been unplanned. Often these developments make little or no contribution to infrastructure or services and, instead, rely on existing facilities. This has created significant problems. Some communities feel overwhelmed by the speed and scale of change. Others are disadvantaged by pressures on local</p>	<p>We note the Parish Council's comments about the Strategic Growth Plan, development pressures and the housing growth options. We also note your concern about the capacity of the Soar Valley villages to accommodate housing growth and comments on infrastructure and separation.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be</p>

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	<p>schools, health centres and recreation facilities. Congestion on local roads and private transport is a frequent cause of complaint"</p> <p>4. That statement, made on behalf of Leicestershire's planning authorities is especially relevant to the experience of Mountsorrel and its neighbours in the Soar Valley part of Charnwood. Here there are five "Service Centres" - Barrow-upon-Soar, Quorn, Mountsorrel, Rothley and Sileby in close proximity.</p> <p>5. The common cry over the last decade and more is that these villages have experienced relentless pressure for development and change - some of it planned following the appropriate processes; much of it ad hoc, unplanned growth. Local citizens do "feel overwhelmed by the speed and scale of change"</p> <p>6. There are genuine and widespread concerns that this threatens the identity and separation of the respective settlements; it places too much strain on the social, physical and green infrastructure and in the end it will unacceptably diminish the very virtues which make this part of Charnwood an attractive place in which to live. In this Parish Council's view, therefore the point has arrived where the Soar Valley area should now be the subject of relative restraint and any further growth should only take place where the individual community is convinced that it will constitute beneficial change.</p> <p>7. To that end the Parish Council has suggested to the other Soar Valley Parish Councils that a joint discussion should take place on these important matters to see if there is a common perspective on the balance to be struck.</p> <p>8. In view of the above the Parish Council is very surprised by and very much opposed to the new Local Plan contemplating a "higher growth scenario" (i.e. 15,700 homes in addition to those committed) instead of the 8,100 required to satisfy its own needs. The new Local Plan should be one of controlled, base level growth whilst the County-wide focus of development has "shifted" under the Strategic Growth Plan.</p> <p>9. The consultation document expresses "Broad Options for Charnwood". It is very difficult to assess these without knowing scale, location and respective merits including positive infrastructure change. However, an emphasis on the Leicester and Loughborough urban areas must be the most logical and sustainable. That is where the economic development potential is greatest and therefore where the homes-jobs balance will be maximised.</p>	published for consultation
<p>TLP/95 Lichfields on behalf of Commercial Estates Group (CEG)</p>	<p>Lichfields is advising CEG on the North East of Leicester Sustainable Urban Extension (the NEoL SUE). Planning permissions for development were granted by Charnwood Borough Council (CBC) and Leicester City Council (LCiC) in July 2016. The NEoL SUE is a strategic allocation which will help to meet local housing needs over the current plan period and beyond. CEG is therefore interested in the Towards a Local Plan for Charnwood Discussion Paper and supporting evidence base documents, particularly where draft options or potential development sites may affect the delivery of the NEoL SUE. Vision for Charnwood</p> <p>The Vision to 2028 is considered 'fit for purpose' to guide a new local plan to 2036, in particular in relation to the demand and focus for new housing development. The edge of the existing urban area continues to be the most sustainable location for development and the vision should therefore maintain this spatial approach.</p>	We note your comments related to the delivery of the North East of Leicester Sustainable Urban Extension. The responses to the consultation will inform the Draft Local Plan which will be published for consultation

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	<p>Areas of Local Separation and Green Wedges CEG supports the continued identification of Areas of Local Separation and Green Wedges, including the Syston/Barkby Area of Local Separation and the Leicester Hamilton Green Wedge. These allocations help to identify important areas of green infrastructure which are necessary to maintain the local environment and promote sustainable patterns of development.</p> <p>In the Green Wedge and Areas of Local Separation Review (March 2016; Arup), the land which makes up NEoL SUE falls within PGW-1 (potential green wedge), which is adjoined by GW3 located to the north of Barkby Lane. CEG notes that review refers to the importance of the GW3 being increased because of the development. GW3 will make a substantial contribution in maintaining the physical separation between Syston and Thurmaston and CEG would like to see this maintained in the emerging Local Plan.</p> <p>The approved illustrative masterplan for NEoL SUE includes provision of substantial areas of landscape and green infrastructure, and through the site towards the urban edge of Thurmaston.</p> <p>Settlement Hierarchy The proposed settlement hierarchy provides a helpful basis for considering development options. If it is included in the emerging local plan, it should however recognise the emerging new 'settlements' including the NEoL SUE as an 'urban settlement'. These SUEs will be related to existing urban areas but have a distinct character and function as sustainable settlements in their own right.</p> <p>Regarding comments in the Settlement Hierarchy Assessment (March 2018; CBC) and the Charnwood Settlement Draft Limits Assessment (March 2018; CBC), the extent of the NEoL SUE is clearly defined in the approved parameter plans, and consequently the limit of development for a NEoL SUE 'urban settlement' can be identified now (see attached parameter plan: 1. Development Extent).</p> <p>Housing Strategy Options and Sites that are Available Growth Scenarios The Council has identified a need for 994 homes a year to 2036 (Leicester and Leicestershire Housing and Economic Development Needs Assessment, 2017) as well as a further 66ha of employment land (Charnwood Employment Land Review, 2018). The discussion document sets out two potential growth scenarios for the Borough to meet the identified housing and employment land need within the borough. CEG welcomes the Council's acknowledgement, in paragraph 2.42, that there is a point where adding more sites does not increase the rate of housing delivery. It is therefore important to set a level of growth and allocate sites which can be delivered within the plan period, and to ensure the new plan supports the delivery of existing allocations.</p> <p>Additionally, CEG acknowledges the reference to NEoL SUE in Chapter 3 as the largest of the three Sustainable Urban Extensions in the borough. The NEoL SUE continues to have a significant role in</p>	

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	<p>meeting housing needs up to 2036, and CEG welcomes the acknowledgement of this contribution to meeting the needs at paragraph 3.4.</p> <p><i>Broad Locations for Housing Development</i> The discussion paper outlines seven options for delivering the most homes, including, but not limited to, urban extensions, new homes being dispersed throughout the Borough and the potential for new settlements in the countryside. This is considered to be a reasonable range of options.</p> <p>CEG would support a continuing positive policy context surrounding large-scale housing delivery and associated infrastructure by the Borough, and encourages the Council to maintain sustainable urban extensions as the principal growth option to meet housing need. The deliverability of already committed sites including NEoL SUE will support this long-term strategic objective. It will be important to consider the impact of any additional development in terms of timing and location if allocating additional large-scale housing allocations in the area to the north of Leicester, to avoid an adverse impact on existing and upgraded infrastructure and services in the area, and to support the delivery of already permitted new homes.</p> <p>CEG favours Option 2 (Leicester and Loughborough Urban Areas and Service Centres), in order to ensure new housing development is in sustainable locations with good access to existing services, infrastructure, and jobs. This option would provide a range of type and sizes of sites and ensure flexibility for delivery as well as an opportunity to deliver improved and new infrastructure and affordable housing benefits throughout the Borough in a sustainable development pattern, and could also include additional provision on the edge of Leicester to meet longer term needs.</p> <p>Employment Strategy Options The discussion paper considers three options to accommodate employment growth: relying on existing employment allocations; identifying new employment land to facilitate regeneration; identifying new employment land for large warehousing.</p> <p>CEG favours Option 1 (Rely on Existing Employment Allocations), with the new Local Plan supporting existing employment allocations, including those at NEoL SUE, to meet the overall need for employment land in the Borough and support long term positive effects on the local economy.</p> <p>CEG notes that Option 2 (Identify New Employment Land to Facilitate Regeneration) suggests several sites in Thurmaston have a poor relationship with surrounding uses and some are constrained by poor access. The document states that 10ha of new employment land could be identified in northern Leicester to enable the release of these sites for housing. CEG recognises the benefits of this approach and the potential economic impact of strengthening employment provision in this area, but the timing of any release should take into account of the need to deliver new homes and employment opportunities within the NEoL SUE.</p>	

In summary, CEG welcomes this early consultation and acknowledges that the Council are in the early stages of setting a planning policy framework for future development. CEG supports growth within Charnwood Borough, but careful consideration is required to ensure additional new development sites do not adversely impact on the delivery of committed developments and strategic allocations within the area.

As a key stakeholder involved in the delivery of the NEoL SUE, CEG would welcome the opportunity to discuss any of the matters raised with the Council if our further input would support the plan preparation process.

Land Use	Use Class	Site Area
Approximately 4,500 residential units (including affordable housing) and specialist housing	C3 and C2	Approximately 133.2 ha
Employment Land	B1, B2 and B8	Up to 13.0 ha
District Centre	A1-A5, B1, C1, D1, D2 and C3	Including up to 17,000 sqm of A Class uses which includes: a foodstore of up to 4,500 sq.m, small convenience stores of up to 1,200 sq.m, comparison stores of up to 6,000 sq.m and service of 5,300 sq.m)
Two Local Centres	A1-A5, B1, C1, D1, D2 and C3	Combined area of 1.2 ha comprising: small convenience stores of up to 1,600 sq.m, comparison stores of up to 700 sq.m and service of 700 sq.m
Up to 3 no. Primary schools	D1	Total site area of 6.2 ha (including playing fields)
A reserve site for a secondary school	D1	Site area of minimum 7.8 ha
A reserve site for gypsies and travellers	Sui Generis	Site area of 1.1 ha

1. The Extent of Development

The area in yellow denotes the maximum extent of built development within the NEoLSUE for the uses as set out in the

table opposite and associated engineering and landscaping works, including SuDS.

Outside of this area and within the site boundary, features and ‘development’ that may take place within the open land will include:

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	<ol style="list-style-type: none"> 1. cycleways 2. footpaths 3. lighting 4. roads/bridges, (e.g. link to A607) 5. street furniture 6. changing rooms 7. infrastructure 8. SuDS 9. allotments 10.fencing 11.sports pitches <p>In effect, the physical features required to serve the development and implement the green infrastructure strategy.</p> <p>Further documents/information submitted with representation ref : TLP/95</p>	
<p>TLP/96 Tetlow King Planning on behalf of Rentplus UK</p>	<p>Introduction</p> <p>1.1 This report has been prepared by Lichfields on behalf of Rentplus, and it accompanies representations being made by Rentplus on the Government’s proposed new standard housing need methodology. The report provides a proposed approach for assessing the need for a new housing tenure known as “affordable rent to buy” at a local authority level.</p> <p>1.2 “Affordable rent to buy” housing provides a route to home ownership for people who are currently unable to purchase a property on the open market but are not considered a priority for social or affordable rented accommodation.</p> <p>1.3 The proposed methodology within this report is based upon the housing product offered by Rentplus but its principles are applicable to the affordable rent to buy tenure as a whole.</p> <p>The Rentplus affordable rent to buy model</p> <p>1.4 The Rentplus model provides an accessible route to home ownership for those who cannot currently purchase a house on the open market for a variety of reasons, including the inability to provide a deposit¹, but who would otherwise not be considered a priority, or qualify for social or affordable rented homes.</p> <p>1.5 Rentplus has provided the following details regarding its affordable rent to buy product:</p> <p>1 Rentplus homes are made available on five year renewable assured shorthold tenancies (AST) at an affordable rent and are managed by a housing association, which also provide a full repair and maintenance service. Prospective tenants/purchasers are assessed for eligibility for a Rentplus home</p>	<p>We note the additional information provided on housing tenure. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

RESPONSE NO/ CONSULTEE	RESPONSES	OFFICER COMMENTS
	<p>based on their current income and future prospects. This is also used to determine when they will have the opportunity to buy their home at either 5, 10, 15 or 20 years at which time it is expected the home will be purchased by the tenant at open market value with a benefit of a 10% gifted deposit from Rentplus to add to their own savings.</p> <p>2 The Rentplus model aims to assist purchasers in saving for their purchase costs and to add to the Rentplus deposit as well as improving the credit rating by paying a reduced (affordable) rent rather than a private market rent for the duration of the tenancy. The rent charged on a Rentplus property is an Affordable Rent and is set at the lower of 80% open market rent or LHA and includes services charges. Tenants have no repair or maintenance responsibilities whilst they are renting the property.</p> <p>3 If the tenant is not able to buy their home at the date agreed at the start of the tenancy arrangements are in place to manage this. Either Rentplus will substitute the planned purchase with that of a tenant who originally planned to buy their home at a later date but is able to bring forward the purchase of their own home. This allows the first tenant to remain in their home with a further five year AST and more time to prepare for their purchase. If this is not possible, Rentplus will offer the property for sale to the managing housing association with a 10% discount on the open market value. The housing association will then determine the most suitable use for the property as an affordable home, which could be to continue to rent to the current tenant or to offer the home under a shared ownership model. If neither the tenant nor the housing association purchases the property, the property will be sold on the open market and 10% of the sales proceeds net of Rentplus' costs will be paid to the local authority to reinvest in new affordable housing provision.</p> <p>¹ Rentplus website, FAQs</p> <p>Policy context</p> <p>1.6 Paragraph 50 of the National Planning Policy Framework (NPPF) requires local planning authorities to, inter alia:</p> <p>1 Widen opportunities for home ownership; 2 Plan for a mix of housing based on factors such as demographic and market trends ; and, 3 Identify the tenure of housing that is required in particular locations, reflecting local demand.</p> <p>1.7 The Planning Practice Guidance (PPG) further emphasises the importance of planning for a mix of housing types and tenures that reflects local demand (ID: 2a-021):</p> <p>“Plan makers should look at the household types, tenure and size in the current stock and in recent supply, and assess whether continuation of these trends would meet future needs.”</p> <p>1.8 Affordable rent to buy housing can contribute towards these NPPF requirements by offering an additional route to home ownership, a type of housing that responds to demographic and market trends, and a new tenure option that reflects local demand.</p>	

2.0 Methodology

PART A: Current situation

2.1 Affordable rent to buy housing is likely to be particularly attractive to those aged 25-34, given that the majority of first-time buyers are within this cohort.

2.2 An analysis of the average age of tenants at six Rentplus affordable rent to buy developments within the south of England² indicates the following age distribution:

Table 2.1 Demographic profile of tenants at six Rentplus developments: age of oldest household member

Table 2.1 Demographic profile of tenants at six Rentplus developments: age of oldest household member

Age group	% of total households
18-24	7%
25-34	64%
35+	26%
Unknown	2%
Average age	32.6 years

Source: Lichfields analysis of Rentplus data (provided October 2017)

2.3 This analysis indicates that 71% of tenants at the identified affordable rent to buy developments were aged below 34, with 64% falling into the 25-34 age cohort which is known to have been most severely affected by affordability constraints.

2.4 The problem of declining affordability for younger households is acknowledged within the Explanatory Notes supporting the new Housing and Planning Act 2016 (paragraphs 7 and 8):

“Although now abated, the long-term downward trend in owner occupation has disproportionately affected younger households. Of those households that do own their home 75% are over the age of 45 and nearly half (46%) of households in the 25-34 age group live in the private rented sector (only 21% were renting privately in 2003-04). Over the last twenty years, the proportion of under 40 year olds who own their home has fallen by over a third from 61% to 38% and, in 2014, the Office for National Statistics (ONS) reported that 3.3 million people between the ages of 20 and 34 were still living with their parents (accounting for 26% of the age group).

“The number of first-time buyers since the financial crash of 2007-08, as measured by the number of mortgages issued to first-time buyers, has fallen significantly. Throughout the 1980s and 1990s the number of mortgages to this group averaged over 400,000 per year but between 2008 and 2014 the average annual number of loans has been fewer than 300,000”.

2.5 This evidence reflects that set out in the English Housing Survey which notes that the average age

of a first-time buyer in England was 32 in 2015/16. Nearly two thirds (64%) of first-time buyers were aged 25-34 and 29% were older (aged 35+)³. Although it would be too simplistic to suggest that the number of young people (and households) can be taken to reflect the need for affordable rent to buy housing in an area, it is likely that the need will be greater in an area with more young adults and where the existing housing supply is oriented towards larger and more expensive properties.

² Palmerston Heights, Plymouth; Corelli Estate, Sherbourne, Dorset; Moorgate, Lechlade; Flanders Close, Bicester; Saxon Fields, Cullompton; and Knighton Road, Wembury.

³ English Housing Survey 2015/16, Table AT1.8

2.6 The English Housing Survey indicates that the average (mean) deposit for first-time buyers in England was £48,831 in 2015/16, and two thirds (65%) of first time buyers were earning in the top 40% of all households⁴. Whilst house prices and hence the level of deposit required varies across the country, it is notable that households living at five Rentplus developments⁵ had average savings of just over £2,000, demonstrating that saving for a deposit represents a major barrier to home ownership for many people.

Demographic and household profile

2.7 An assessment of need for any type of affordable rent to buy housing should commence with an overview of the current situation within the local area in respect of the demographic profile, housing stock and market signals. Consideration of existing and projected future population levels and household need and composition provides a baseline through which key pressure points can be identified and drawn out by further research. The key metrics that should be considered are summarised below:

Table 2.2 Demographic and housing profile metrics

Metric	Issues to consider	Data sources
Population by age cohort	<ul style="list-style-type: none"> Total population in local authority Number of persons by age cohort Proportion of total population within different age cohorts 	ONS Mid-Year Population Estimates
Population projections	<ul style="list-style-type: none"> Projected level (and proportion) of future population change Projected level (and proportion) of future change in different age cohorts 	ONS Sub National Population Projections
Household composition	<ul style="list-style-type: none"> Profile of households by type (e.g. single person, couple, family with dependent children, family with non-dependent children, other) Profile of households by age of head of household 	2011 Census data
Household occupancy	<ul style="list-style-type: none"> Level of over and under-occupancy of housing within local authority, in terms of number of spare bedrooms within property) 	2011 Census data
Projected household growth	<ul style="list-style-type: none"> Projected number of additional households expected in next 20-25 years Projected change in household composition (age and occupancy structure) 	CLG Household projections

Housing stock

2.8 The current stock of housing will influence the ability of newly forming households to access a suitable property. Indicators such as the overall housing stock, number of new completions, and the size, type and average cost of housing will all be relevant and should be considered by way of background to the assessment of need for affordable rent to buy housing. The key metrics that should be considered are summarised below:

⁴ English Housing Survey 2015/16, Table AT1.8 and AT1.9

⁵ Palmerston Heights, Plymouth; Corelli Estate, Sherbourne, Dorset; Flanders Close, Bicester; Saxon Fields, Cullompton; and Knighton Road, Wembury. No household savings information is available for the scheme at Moorgate, Lechlade.

Table 2.3 Housing stock metrics

Metric	Issues to consider	Data sources
Dwelling stock	<ul style="list-style-type: none"> Number of houses in local authority Number of recent housing completions 	CLG Live Tables 100 and 253 Local Authority Annual Monitoring Report
Housing Type and size	<ul style="list-style-type: none"> Profile of dwelling stock (e.g. detached, semi-detached, terraced, flats) Profile of dwelling stock by number of bedrooms and number of habitable rooms 	2011 Census data 2001 Census data (to provide comparison of change over time)
House Prices	<ul style="list-style-type: none"> Median and lower quartile house prices Change in house prices over time Median and lower quartile house prices per type of dwelling 	HM Land Registry Data ONS House Price Statistics for Small Areas
Sales Turnover	<ul style="list-style-type: none"> Number of transactions in local authority by year and type of dwellings 	HM Land Registry Data
Affordability	<ul style="list-style-type: none"> Ratio of median income to median house prices 	CLG Live Table 576
Rental Levels	<ul style="list-style-type: none"> Average rental value for different house sizes 	VOA Private Market Rental Statistics

PART B: Assessment of need

2.9 The assessment of the need for all types of affordable rent to buy home should be undertaken within the context of the full objectively assessed housing need (FOAN) for the relevant local authority area. The identification of the FOAN is therefore the starting point when calculating the need for this tenure. This position will not change following any revision to the NPPF and PPG in response to the Government's new standardised housing need methodology.

Full objectively assessed housing need

2.10 The current process for calculating FOAN is established within the NPPF and PPG. The FOAN represents a level of housing delivery that meets the needs associated with population and household growth, addresses the needs for all types of housing, including affordable housing, and caters for housing demand (NPPF 159). Plan makers should not apply constraints to the overall assessment of need (PPG ID: 2a-004).

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	<p>2.11 The starting point is for Local Plans to meet the FOAN of their area in full (NPPF 16, 17, 47, 156 and 158). The assessment should be viewed within the context of the NPPF requirement for local planning authorities to “boost significantly the supply of housing” (NPPF 47).</p> <p>2.12 The current versions of the NPPF and PPG require the following key steps to be taken in order to arrive at a robustly evidenced and objective assessment of housing need:</p> <p>1 The most recent housing projections published by DCLG should provide the starting point for any estimation of housing need but adjustments should be made to reflect local demography, household formation rates, market signals and the need for affordable housing (PPG ID: 2a-015, 2a-020 and 2a-029).</p> <p>2 Consideration should also be given to the likely level of future growth in employment. Particular consideration should be given to the scale and location of new housing where the labour force supply is less than projected job growth (PPG ID: 2a-018).</p> <p>3 Where an authority is unable to meet its objectively assessed development needs, it must be demonstrated under the statutory duty-to-cooperate that the unmet need will be met by other local authorities in order to fully meet development requirements across housing market areas (NPPF 179 and 182).</p> <p>2.13 In addition, High Court and appeal decisions have determined that:</p> <p>1 A distinction exists between FOAN (“policy-off”) and housing requirements (“policy-on”)⁶.</p> <p>2 The FOAN should not be constrained. Consideration of constraints is only acceptable when assessing the ability of an area to satisfy the FOAN, but this should be dealt with through the Local Plan process⁷.</p> <p>3 The “policy-on” exercise that is undertaken as part of the assessment of housing requirements does not have any bearing upon the FOAN but rather upon the extent to which this need can be satisfied⁸.</p> <p>4 In assessing the FOAN for any area, economic considerations, migration trends, second homes and vacancy rates should all be taken into account. Judgment is required in respect of these matters but such judgment does not constitute a policy-on decision⁹.</p> <p>5 Rather than the inclusion of employment trends within the FOAN calculation being policy- on, quite the opposite is true, such that failing to accommodate the additional workers drawn to an area by increased employment opportunities would be a policy-on decision which would affect adjoining authorities¹⁰.</p> <p>6 Consideration should be given to the need for affordable housing in seeking to ascertain the FOAN¹¹.</p> <p>2.14 The appropriate process that should be followed when seeking to determine the FOAN can be summarised as follows.</p> <p>⁶ (1) Gallagher Homes Limited and (2) Lioncourt Homes Limited v Solihull Metropolitan Borough Council [2014] EWHC 1283.</p> <p>⁷ Hunston Properties v Secretary of State for CLG and St Albans City and District Council (2013) EWHC 2678, and R v City and District of St Albans (2013) EWCA Civ 1610.</p>	

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⁸ Ibid.

⁹ Land at Pulley Lane, Newland Road and Primslan Way, Droitwich Spa (APP/H1840/A/13/2199085) and Land north of Pulley Lane, Newland Road and Primslan Way, Droitwich Spa (APP/H1840/A/13/2199426) (2 July 2014).

¹⁰ Oadby and Wigston Borough Council v Secretary of State for Communities and Local Government and Bloor Homes Ltd (2015). EWHC 1879.

¹¹ Borough Council of Kings Lynn and West Norfolk v Secretary of State for Communities and Local Government and Elm Park Holdings Ltd. (2015). EWHC 2464.

Figure 2.1 NPPF and PPG Approach to Objectively Assessing Housing Need



Source: Lichfields based on NPPF / PPG

2.15 The Government's new proposed methodology for the assessment of housing need is summarised below in figure 2.2. This approach is substantially simplified. It also starts with the latest official household projections, then considers whether an uplift should be applied based on local levels of affordability.

Figure 2.2 Department for Communities and Local Government: Proposed new housing need methodology



Source: Lichfields

Need for affordable rent to buy

2.17 Once the FOAN has been established, the PPG requires local planning authorities to provide a breakdown of total housing need by tenure (ID: 2a-002). The determination of need for affordable rent to buy housing would therefore form a part of this assessment. The assessment should be performed at a local authority level, in order to align with the FOAN, as a reasonable proxy for the number of newly-forming households in the area.

2.18 The consultation document that accompanies the standardised methodology for assessing housing need also requires consideration to be given to disaggregate the total need for housing to different types and tenures in the area, including affordable housing. Accordingly, the need to have a robust approach to assessing the need for affordable rent to buy housing (and other housing products) will remain even following the introduction of the standard methodology. This proposed methodology is reliant upon available data sources containing information at a local authority level. Further refinement of this approach may be appropriate if additional data becomes available in order to better reflect local circumstances and the needs of first-time buyers.

Newly-forming households able to afford open market housing

2.19 Affordable rent to buy housing is aimed at households that are unable to purchase a home on the open market. Those that are already able to buy an open market property should not be included in the assessed need for this tenure. Therefore, it is first necessary to identify the number of households in

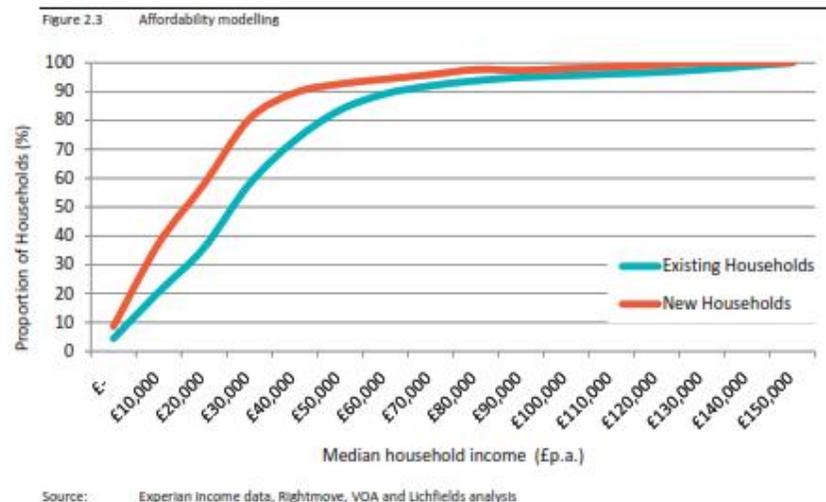
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	<p>this category in order that they can be removed from the need figure.</p> <p>Step 1: Identify median house price</p> <p>2.20 Whilst the PPG details the process for assessing the number of households specifically in need of affordable housing, there is no standardised approach for assessing the number of households that can afford to access property on the open market. One of the tests for affordable housing need is to set household income against lower quartile house prices (ID: 2a-25). However, it should not be assumed that all households with the necessary incomes to support the purchase of a lower quartile priced home will be able or willing to do so. There is a general correlation between house prices and sizes, the implication of which is that the cheapest properties that might be within the reach of those on lower incomes may be too small to meet the needs of some households (e.g. those with families), and many will require refurbishment, which a large proportion of first-time buyers will be unable to finance.</p> <p>2.21 In the light of this, for an affordable rent to buy assessment, it is more appropriate to assess the ability of a first-time buyer household to purchase a property on the open market against the median house price for the area. Median house prices can be identified from ONS's ratio of house price to residence-based earnings data. This data is provided at a local authority level.</p> <p>2.22 This approach in testing affordability against median house prices is also consistent with DCLG's proposed standard housing need methodology, which applies an affordability ratio based on median earnings and median house prices.</p> <p>Step 2: Gross household income required for open market purchase</p> <p>2.23 This stage undertakes an affordability test for those able to purchase a home on the open market at the median price for the local authority area. In order to understand what income would be required to sustain ownership or occupation of such properties, it is necessary to consider how much households can afford to spend on their housing.</p> <p>2.24 The former CLG SHMA Guidance (2007; now revoked) sets out that a household can be considered able to afford to buy a home if it costs 3.5 times the gross household income for a single earner or 2.9 times the gross household income for a dual-income household. In December 2016, the Council of Mortgage Lenders identified that the average income to loan multiple for purchases was 3.57. Given that this is a more up-to-date source, it is considered to be preferable.</p> <p>2.25 Using this figure, it is possible to calculate the gross household income required to support the purchase of a property at the median house price identified in Step 1. In so doing, an assumption would need to be applied regarding the scale of deposit that such households might have, and this could be subject to sensitivity testing. We would suggest that a range of figures between 10% and 25% should be applied.</p>	

Step 3: Gross household income distribution analysis (open market purchase)

2.26 In order to calculate the number of newly-forming households that are in receipt of the minimum gross household income identified in Step 2, it is necessary to analyse the gross income distribution for households in the relevant local authority area.

2.27 Whilst data on individual incomes can be obtained from the ONS Annual Survey of Hours and Earnings (ASHE), household income figures are not currently freely available. However, this data can be purchased from economic forecasting companies, such as Experian. It may also be feasible to estimate gross household income using ASHE data on individual earnings, through the application of appropriate assumptions on the number of earners per household¹².

2.28 It is important to note that the income distribution of newly-forming households is different to that for all households, with earnings approximately 33% below those for existing households¹³. Therefore, the gross household income distribution should be adjusted to account for this difference. This can be illustrated on a graph that shows the proportion of new and existing households earning different amounts. An example graph is shown below.



2.29 Step 4: Remove newly-forming households able to purchase open market housing

2.30 Following on from the previous steps, it will be possible to identify the proportion of newly-forming households that earn enough to access a house on the private market and that would therefore not require affordable rent to buy housing. This number of households should be removed from the total FOAN in order to focus on the target market for the affordable rent to buy tenure.

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	<p>Rental affordability</p> <p>2.31 Affordable rent to buy housing is not suitable for every household that cannot afford to purchase its own home on the open market, and it does not replace the need for social rented homes, not least because it will be unaffordable for a proportion of households.</p> <p>2.32 The next step in assessing the need for affordable rent to buy is therefore to undertake an affordability test, similar to that which is conducted in the calculation of affordable housing need outlined in the PPG (ID: 2a-025). This step identifies the minimum level of household income needed in order to support an affordable rent to buy home.</p> <p>¹² Shelter Private Rent Watch Report one: Analysis of local rent levels and affordability (October 2011). ¹³ This comes from the 2004/05 English Housing Survey published in October 2006. This data is no longer collated but represents a buoyant point in the economy, there is no newer evidence and there is nothing to suggest that the situation for newly forming households has improved.</p> <p>Step 5: Average annual rent for an affordable rent to buy home</p> <p>2.33 In the case of the Rentplus product, the rent charged is set at “80% of the local market rents or the Local Housing Allowance (Housing Benefit) level whichever is the lower.” (Rentplus website FAQs). This level of rent could be taken as a proxy across the affordable rent to buy tenure.</p> <p>2.34 In making this assumption, the affordable rent to buy assessment should first identify the annual median market rent for the relevant local authority, using Valuation Office Agency (VOA) Private Rental Market Statistics and then calculate 80% of this rent. This figure represents the approximate annual rent that could be charged for an affordable rent to buy property in the local area.</p> <p>2.35 For the purposes of the assessment of need, it is more appropriate to apply 80% of the market rent than identifying an average level of Local Housing Allowance (LHA) within a local authority area, given that this allowance varies depending upon the size of the property and the Broad Rental Market Area in which the property is located.</p> <p>Step 6: Gross household income required for affordable rent to buy</p> <p>2.36 The next step is to calculate the level of household income required in order to access an affordable rent to buy home.</p> <p>2.37 The 2015/16 English Housing Survey found that the national average proportion of gross household income (including state assistance) spent on rent was:</p> <p>1 35% for the private rented sector; 2 27.6% for those living in local authority housing; and, 3 28.6% for those living in housing association properties¹⁴.</p>	

RESPONSE NO/ CONSULTEE	RESPONSES	OFFICER COMMENTS
	<p>2.38 Other sources also suggest broad rules of thumb between 25% and 35% of gross income as being the appropriate threshold¹⁵.</p> <p>2.39 The issue of how much households should be expected to pay for their housing as a proportion of their average income has also been considered by two recent Local Plan Inspectors. Whilst the focus of this consideration has been upon affordable housing need it is directly relevant to the determination of need for affordable rent to buy properties.</p> <p>2.40 In paragraphs 17 and 18 of his report, the Inspector into the East Hampshire Joint Local Plan stated:</p> <p><i>“17. National guidance advises that, in assessing the need for affordable housing, plan makers should identify the minimum household income required to access lower quartile housing. The SHMA assumes that households will spend 25% of their income on renting a house, an assumption it says ‘draws upon widely established and utilised benchmarks’. The SHMA goes on to say that; ‘In some cases it may be that in the face of acute housing affordability pressures, households choose to stretch their finances in order to access housing. This may reduce the level of affordable housing need, suggesting affordable needs may be fully met even at lower levels of housing delivery.....albeit with adverse consequences for those households in terms of discretionary income’. The SHMA then goes on to recommend that a 30% income threshold would appear reasonable based on data that indicates that households are actually spending more than that on rent.</i></p> <p><i>18. So, instead of planning positively to help assuage acute housing affordability pressures by, say increasing supply, the SHMA appears to advocate an approach which down plays demand. It may well be that, in order to live in a decent home; people are forced to spend more. However, it is not right, in my view, to plan on the basis that it is acceptable for those in need to have their already limited incomes squeezed just so they can live in a decent home (and the need for affordable housing reduced for the purposes of plan making). (Lichfields emphasis)</i></p> <p>2.41 This issue was addressed by the Eastleigh Local Plan Examination Inspector’s report which states at paragraphs 32 and 33 that:</p> <p><i>“The PUSH SHMA assumes (EBC/H4A, 8.6) 30% of gross income spent on housing is the threshold for households in need of affordable housing. Many developer interests consider that this is too high and highlight the reference to a 25% threshold in the 2007 DCLG SHMA Guidance. But that document has been cancelled. National Policy Guidance (the Guidance) does not specify a threshold. I note that 30% of the estimated income required to access market housing in Eastleigh would be (just) insufficient to rent an entry level two bedroom property. Three bedrooms would be out of reach. Thus a proportion of families would not be able to secure accommodation of adequate size when spending 30% of income on housing (SHMA Appendices, Table 23, p73 and Figure 18, p70). A 30% threshold should thus be seen as the upper end of a possible</i></p>	

RESPONSE NO/ CONSULTEE	RESPONSES	OFFICER COMMENTS
	<p>range.</p> <p><i>“Using the SHMA methodology, a 25% income threshold would increase the identified need for affordable housing to about 624 dpa for Eastleigh (prior to any role assigned to the PRS). This highlights the sensitivity of the threshold used. Accordingly, the figure in the SHMA of 509 dpa should be seen as a baseline, with actual needs recognised as potentially greater. In this context, <u>I see no justification for the Council assuming that more than 30% of income could reasonably be spent on housing. Some households may be forced to do so, but that does not make it a justified approach to assessing need</u>” (Lichfields emphasis).</i></p> <p>¹⁴ CLG English Housing Survey 2015/16, Annex Table 1.13 ¹⁵ Shelter Private Rent Watch Report one: Analysis of local rent levels and affordability (October 2011).</p> <p>2.42 A number of local authorities have sought to argue that a higher proportion (35%) should be applied but it is worth noting that 35% of gross income would represent an even more significant proportion of net income which households actually receive, likely getting close to 50%. In the light of this, and on the basis of the above remarks, it is considered that 30% would be an appropriate starting point upon which to base the assessment of the ability of local people to access the housing market, although the precise figure should be selected on a case-by-case basis, taking account of local affordability issues. Indeed, eligible households may opt to “stretch” themselves to take advantage of the opportunity to secure a home that they will eventually own.</p> <p>2.43 This threshold should be applied to the annual rent for an affordable rent to buy property in the local authority area (calculated in Step 5) in order to identify the gross household income required in order to access an affordable rent to buy home.</p> <p>Step 7: Proportion of remaining newly-forming households able to access affordable rent to buy</p> <p>2.44 Using the same gross household income data and approach applied in Steps 2 and 3, it is possible to identify the proportion of remaining¹⁶ newly-forming households that are in receipt of the required gross household income identified in Step 5. These households would therefore be able to access an affordable rent to buy home in the relevant local authority area. Any households earning less than this figure would not be able to afford a rent to buy home and so would not be included within the identified need.</p> <p>Affordable rent to buy eligibility</p> <p>Step 8: Remove any newly-forming households earning £80,000 pa or more</p> <p>2.45 The Government’s Help to Buy Shared Ownership eligibility criteria should be used as a proxy for eligibility for affordable rent to buy homes. Based on this criteria, any newly-forming households earning £80,000 pa or more (or £90,000 or more in London) should be removed from the total affordable rent to buy housing need figure. However, depending upon the location, it is not anticipated that there will be a</p>	

large number of households that pass through Step 4 that would achieve this level of income.

2.46 The principle of this eligibility criteria is considered to be appropriate for all affordable rent to buy homes, given that the tenure is aimed at those households that are in need of financial support in order to access home ownership.

Summary

2.47 Table 2.4 provides a summary of the steps required in order to assess the need for affordable rent to buy housing in any given local authority area.

Table 2.4 Assessment of need for affordable rent to buy housing

Assessment stages
Starting point: FOAN
Newly-forming households able to afford open market housing
1. Identify median house price
2. Gross household income required for open market purchase
3. Gross household income distribution analysis (open market purchase)
4. Remove newly-forming households able to afford open market housing
Rental affordability
5. Average annual rent for an affordable rent to buy home
6. Gross household income required for rent to buy
7. Proportion of remaining newly-forming households able to afford rent to buy
Affordable rent to buy eligibility
8. Remove any newly-forming households earning £80,000 pa or more

¹⁶ Following the removal of those that can afford open market housing in Step 4

2.48 The approach therefore starts with the determination of FOAN for the area (using the relevant approved methodology), before then identifying the number of households that can afford to access housing on the open market, and the proportion of households that could not afford an affordable rent to buy property and those that are ineligible for the tenure. The remaining number of households (that can access affordable rent to buy but cannot compete on the open market) represents the need that exists in the local area for an affordable rent to buy property.

2.49 This calculation can be summarised as follows:

Table 2.5 Assessment of need for affordable rent to buy housing (equation)

FOAN <i>minus</i> newly-forming households able to afford open market housing <i>multiplied by</i> % of remaining newly-forming households able to access affordable rent to buy <i>minus</i> Newly-forming households earning £80,000 pa or more

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	<p>3.0 Conclusion</p> <p>3.1 In the foreword to the Housing White Paper, the Prime Minister stated:</p> <p><i>“Our broken housing market is one of the greatest barriers to progress in Britain today. Whether buying or renting, the fact is that housing is increasingly unaffordable – particularly for ordinary working class people who are struggling to get by.</i></p> <p><i>“Today the average house costs almost eight times average earnings – an all-time record. As a result, it is difficult to get on the housing ladder, and the proportion of people living in the private rented sector has doubled since 2000.</i></p> <p><i>“These high housing costs hurt ordinary working people the most. In total more than 2.2 million working households with below-average incomes spend a third or more of their disposable incomes on housing.</i></p> <p>...</p> <p><i>“I want to fix this broken market so that housing is more affordable and people have the security they need to plan for the future.</i></p> <p><i>“The starting point is to build more homes...</i></p> <p><i>“We need to build many more homes, of the type people want, in the places they want to live. To do so requires a comprehensive approach that tackles failure at every point in the system.”</i></p> <p>3.2 Following on from this recognition of the need to provide more homes, the DCLG’s consultation paper, “Planning for the right homes in the right places” highlights the importance of providing an appropriate housing mix at paragraph 88:</p> <p><i>“It is important that local planning authorities do not just plan for the right number of homes, but also the different size, type, tenure and range of housing that is required in their area.”</i></p> <p>3.3 The affordable rent to buy tenure provides an innovative solution to the challenges that faces the housing market in this country. By focusing upon aspiring home owners that are currently unable to compete within the open market and unable to save for a mortgage, it provides an alternative to the private rental sector which is characterised by high rents, an insecurity of tenure and below-average living conditions. Crucially, the model also provides an opportunity for households that would not qualify for affordable housing. Accordingly, it provides a response to recognised pressures at a number of points in the system in a way that is not otherwise being provided.</p> <p>3.4 The potential contribution of affordable rent to buy can be most effectively understood through a demonstration of the level of need that exists for the product. This report has set out a robust methodological approach to undertake such an assessment of need. This approach draws upon the policy contained within the NPPF and guidance set out in the PPG, together with the conclusions of relevant High Court and Court of Appeal judgments and appeal decisions, and Lichfields’ considerable experience in assessing the overall need for housing in local authority areas (FOAN) and affordable housing need. It is an approach that draws upon readily available data sources and which benefits from</p>	

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	<p>transparency and clarity.</p> <p>3.5 By demonstrating that a need exists for affordable rent to buy properties, and that this represents a distinct component of the overall housing need for an area, it will be possible to build a strong case in support of any planning application for development. This will be supplemented by an explanation of the economic and social benefits of this type of development, which can be very significant to a local area and the people that will benefit from this innovative form of housing tenure.</p> <p>3.6 The assessment of the need for affordable rent to buy housing should be undertaken within the context of the FOAN for each local authority area and should contribute towards meeting this overall need. In particular, affordable rent to buy homes are helping to address the specific needs of a given section of the population whose needs are currently not being met by the traditional housing tenures.</p> <p style="text-align: center;">Appendix 1: Data sources</p> <table border="1" data-bbox="723 616 1368 1011"> <thead> <tr> <th>Information</th> <th>Data sources</th> </tr> </thead> <tbody> <tr> <td>Population by age cohort</td> <td>ONS Mid-Year Population Estimates</td> </tr> <tr> <td>Population projections</td> <td>ONS Sub National Population Projections</td> </tr> <tr> <td>Household composition</td> <td>2011 Census data</td> </tr> <tr> <td>Household occupancy</td> <td>2011 Census data</td> </tr> <tr> <td>Projected household growth</td> <td>CLG Household projections</td> </tr> <tr> <td>Dwelling stock</td> <td>CLG Live Tables 100 and 253 Local Authority Annual Monitoring Report</td> </tr> <tr> <td>Housing type and size</td> <td>2011 Census data 2001 Census data (to provide comparison of change over time)</td> </tr> <tr> <td>House prices</td> <td>HM Land Registry Data ONS House Price Statistics for Small Areas ONS ratio of house price to residence-based earnings data</td> </tr> <tr> <td>Sales turnover</td> <td>HM Land Registry Data</td> </tr> <tr> <td>Affordability</td> <td>CLG Live Table 576</td> </tr> <tr> <td>Rental levels</td> <td>Valuation Office Agency (VOA) Private Market Rental Statistics</td> </tr> <tr> <td>Gross household income distribution</td> <td>Economic forecasting companies, e.g. Experian ONS Annual Survey of Hours and Earnings (ASHE)</td> </tr> </tbody> </table>	Information	Data sources	Population by age cohort	ONS Mid-Year Population Estimates	Population projections	ONS Sub National Population Projections	Household composition	2011 Census data	Household occupancy	2011 Census data	Projected household growth	CLG Household projections	Dwelling stock	CLG Live Tables 100 and 253 Local Authority Annual Monitoring Report	Housing type and size	2011 Census data 2001 Census data (to provide comparison of change over time)	House prices	HM Land Registry Data ONS House Price Statistics for Small Areas ONS ratio of house price to residence-based earnings data	Sales turnover	HM Land Registry Data	Affordability	CLG Live Table 576	Rental levels	Valuation Office Agency (VOA) Private Market Rental Statistics	Gross household income distribution	Economic forecasting companies, e.g. Experian ONS Annual Survey of Hours and Earnings (ASHE)	
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<p>TLP/97 House Builders Federation</p>	<p>Introduction Thank you for consulting with the Home Builders Federation (HBF) on the above mentioned consultation. The HBF is the principal representative body of the house-building industry in England and Wales. Our representations reflect the views of our membership, which includes multi-national PLC's, regional developers and small, local builders. In any one year, our members account for over 80% of all new "for sale" market housing built in England and Wales as well as a large proportion of newly built affordable housing. This response answers specific questions set out in the Council's "Towards a Local Plan for Charnwood" consultation document.</p> <p>How much Development is Needed? As currently set out in the National Planning Policy Framework (NPPF) the Council should be proactively supporting sustainable development to deliver a significant boost to the supply of housing to</p>	<p>We note your comments on the scale and distribution of development, the need to have regard to urban and rural housing needs and the types of sites which the Local Plan should bring forward. The responses to the consultation will inform the Draft Local Plan which will be published for consultation</p>																										

RESPONSE NO/ CONSULTEE	RESPONSES	OFFICER COMMENTS
	<p>meet identified housing needs. The Council should ensure that its Local Plan meets Objectively Assessed Housing Needs (OAHN) in full as far as is consistent with the NPPF including identifying key sites critical to the delivery of the housing strategy over the plan period. The Housing White Paper (HWP) "Fixing The Broken Housing Market" also emphasises that the Council should be planning for the right homes in the right places by making enough land available to meet assessed housing requirements.</p> <p>The Charnwood Core Strategy adopted in November 2015 sets out a housing requirement of 13,940 dwellings (820 dwellings per annum) for the plan period of 2011 – 2028. The new Local Plan will set out a proposed minimum housing requirement of 24,850 dwellings (994 dwellings per annum) for the extended plan period of 2011 – 2036.</p> <p>The National Planning Practice Guidance (NPPG) currently advises that OAHN should be unconstrained (ID 2a-004) and assessed in relation to the relevant functional area known as the Housing Market Area (HMA) (ID 2a-008). The NPPG defines a HMA as a geographical area reflecting the key functional linkages between places where people live and work. Charnwood Borough Council is part of the Leicester & Leicestershire HMA together with Leicester, Oadby & Wigston, Melton, North West Leicestershire and Hinckley & Bosworth. The NPPG methodology is a three stage process comprising :-</p> <ul style="list-style-type: none"> · Demographic (based on past population change and Household Formation Rates (HFR)) (ID 2a-015 – 017) ; · Economic (to accommodate and not jeopardise future job growth) (ID 2a-018) ; · Market signals (to counter-act worsening affordability caused by undersupply relative to demand) (ID 2a-019 & 020) ; · Affordable housing need is separately assessed (ID 2a-022 – 028) however the delivery of affordable housing can be a consideration for increasing planned housing provision (ID 2a-029). <p>The Housing & Economic Development Needs Assessment (HEDNA) 2017 by GL Hearn calculates OAHN of 117,900 dwellings (4,716 dwellings per annum) for the HMA between 2011 – 2036 and 24,850 dwellings (994 dwellings per annum) for Charnwood. The OAHN of 994 dwellings per annum for Charnwood comprises of :-</p> <ul style="list-style-type: none"> · Demographic need of 947 dwellings per annum based on 10 year migration trend ; · Plus an affordability adjustment of 47 dwellings per annum. <p>However the Government has been critical that honest assessments of housing needs have not been undertaken. The Government has set out proposals for a standard methodology for the calculation of OAHN. This methodology is summarised as :-</p>	

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	<ul style="list-style-type: none"> · Demographic baseline based on annual average household growth over a 10 year period ; · Workplace-based median house price to median earnings ratio ; · Adjustment factor = Local affordability ratio – 4 x 0.25 ; · 4 · Local Housing Need = (1 + adjustment factor) x projected household growth. <p>By the time of the submission of the Charnwood Local Plan for Examination the Government’s standard methodology will have been implemented. Using the proposed methodology the minimum OAHN for the Leicester & Leicestershire HMA is estimated as 4,743 dwellings per annum and for Charnwood 1,047 dwellings per annum.</p> <p>The Council should fully justify its proposed housing requirement which is less than the standard methodology OAHN. It should also be remembered that the standard methodology is only a minimum starting point. Any ambitions to support economic growth, to deliver affordable housing and to meet unmet housing needs from elsewhere are not negated by this figure. The Government’s objective of significantly boosting the supply of homes remains. The HEDNA identifies a notional housing requirement of 1,280 dwellings per annum to deliver affordable housing in Charnwood. It is important that the Council does not under-estimate the housing needs of the Borough.</p> <p>To fully meet the legal requirements of the Duty to Co-operate the Council should engage on a constructive, active and on-going basis with the other Leicester & Leicestershire HMA authorities to maximise the effectiveness of plan making. One key outcome from co-operation between the Leicester & Leicestershire HMA authorities should be the meeting OAHN in full across the HMA. In the Leicester & Leicestershire HMA there is a declared unmet housing need in Leicester city. The NPPG states that a key element of examination is ensuring that there is sufficient certainty through formal agreements that an effective strategy will be in place to deal with strategic matters such as unmet housing needs when Local Plans are adopted (ID 9-017). To date the Leicester & Leicestershire HMA authorities have failed to determine where in the HMA the declared unmet housing needs from Leicester City will be met. The non-statutory Draft Leicester & Leicestershire Strategic Growth Plan (SGP) states that “The agreed distribution for the period 2011 – 2036 will be set out in a Memorandum of Understanding (MoU) which will be published in early 2018. This will be used as the basis for preparing or reviewing Local Plans with 2036 as an end date”. It was understood that the authorities would be signing this MoU in January 2018 now it is understood that the MoU will not be signed until after the publication of a Draft Local Plan for Leicester which is not anticipated until late 2018. The proposed housing requirement for Charnwood for the plan period ending 2036 should include provision for unmet needs from Leicester city.</p> <p>What are the reasonable Development Strategy Options? In this consultation the Council has identified seven Options for Development. There are associated risks with an over reliance on brownfield and infill sites because as a finite resource the availability of</p>	

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	<p>such sites will decline over time. Furthermore the artificial constraint of housing on greenfield sites will not ensure delivery of unviable brownfield sites nor will it assist with the delivery of affordable housing meaning that not all housing needs can be met. Similarly large urban extensions and / or new settlements may be a sustainable way to deliver housing but such sites can take a long time to develop and cannot meet OAHN in full nor sustain rural communities. Therefore a combination of the all identified Options for Development should be considered in order to meet future housing needs.</p> <p>The inter-relationship between the new Local Plan and the non-statutory Leicester & Leicestershire SGP should also be set out. The Draft SGP focuses on strategic locations for housing growth including along transport corridors and important employment centres so homes and jobs are located in close proximity. Three strategic locations are identified in Charnwood namely North East of Leicester city as part of the Primary Growth Area for circa 40,000 dwellings, the Northern Gateway as part of the Secondary Growth Areas for circa 10,000 dwellings and in Loughborough as an Area of Managed Growth. Post 2036 the SGP will form the framework for Local Plan preparation. Although the Draft SGP proposals occur beyond the new Local Plan end date given the long lead in times associated with such strategic development proposals this should be considered during current plan preparation.</p> <p>The new Local Plan also provides the opportunity for the Council to re- consider the principle of continuing with the designation of Areas of Local Separation and Green Wedges. It is also noted that there is no national policy for the provision of strategic gaps or encouragement in Government policy to have such designations. The NPPF and NPPG make no reference to such designations and provide no advice on the detailed definition of boundaries.</p> <p>Since the start of the plan period 18,500 dwellings have been built and / or consented leaving a residual housing requirement for 6,451 dwellings. The Council is proposing a Housing Land Supply (HLS) including a flexibility contingency of 8,100 dwellings. It is agreed that a flexibility contingency should be applied to the overall HLS in order that the new Local Plan is responsive to changing circumstances and the proposed housing requirement is treated as a minimum rather than a maximum ceiling on overall HLS. It is acknowledged there can be no numerical formula to determine the appropriate quantum of such a flexibility contingency however where a Local Plan or a particular settlement or locality is highly dependent upon one or relatively few large strategic sites greater numerical flexibility is necessary than in cases where supply is more diversified. As identified in Sir Oliver Letwin's interim findings large housing sites may be held back by numerous constraints including discharge of pre-commencement planning conditions, limited availability of skilled labour, limited supplies of building materials, limited availability of capital, constrained logistics of sites, slow speed of installation by utility companies, difficulties of land remediation, provision of local transport infrastructure, absorption sales rates of open market housing and limitations on open market housing receipts to cross subsidise affordable housing. The HBF always suggests as large a contingency as possible of at least 20%. If any of the Council's assumptions on lapse rates, windfall allowances and delivery rates were to be adjusted or any proposed housing site allocations were to be found unsound</p>	

then the Council's contingency would be eroded. The smaller the Council's contingency becomes so the built in flexibility of the Local Plan reduces. The DCLG presentation slide from the HBF Planning Conference September 2015 (see below) illustrates a 10 – 20% non-implementation gap together with 15 – 20% lapse rate. The slide also suggests “the need to plan for permissions on more units than the housing start / completions ambition”.



Extract from slide presentation “DCLG Planning Update” by Ruth Stanier Director of Planning - HBF Planning Conference Sept 2015

The Council should re-consider the settlement hierarchy and the assessment of settlement limits to development in order to provide additional flexibility. It is important that the Council's proposed housing distribution recognises the difficulties facing rural communities in particular housing supply and affordability issues. The NPPG emphasises that all settlements can play a role in delivering sustainable development so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided. One of the core planning principles of the NPPF is to “take account of the different roles and character of different areas... recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it” (para 17) and “to promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities” (para 55). The proposed distribution of housing should meet the housing needs of both urban and rural communities. The Council should consider permitting development adjacent to as well as within settlement boundaries.

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	<p>Available Sites The HBF submit no comments on the merits or otherwise of individual strategic / non-strategic sites so our representations are submitted without prejudice to any comments made by other parties. For the Council to maximize housing supply the widest possible range of sites, by size and market location are required so that house builders of all types and sizes have access to suitable land in order to offer the widest possible range of products. The key to increased housing supply is the number of sales outlets whilst large strategic sites may have multiple outlets usually increasing the number of sales outlets available inevitably means increasing the number of housing site allocations in the case of Charnwood large existing strategic sites should be complimented by smaller scale non-strategic sites. The maximum delivery is achieved not just because there are more sales outlets but because the widest possible range of products and locations are available to meet the widest possible range of demand. This approach is also advocated in the HWP because a good mix of sites provides choice for consumers, allows places to grow in sustainable ways and creates opportunities to diversify the construction sector.</p> <p>The new Local Plan should also deliver new housing to meet the full range of local needs including affordable housing and specialist housing. The HBF recognise that all households should have access to different types of dwellings to meet their housing needs. When planning for an acceptable mix of dwellings types to meet people's housing needs the Council should focus on ensuring that there are appropriate sites allocated to meet the needs of specifically identified groups of households such as self / custom builders and the elderly without seeking a specific housing mix on individual sites. Indeed the housing needs of older people is a diverse sector so the new Local Plan should be ensuring that suitable sites are available for a wide range of developments across a wide choice of appropriate locations.</p> <p>Conclusion It is hoped that these representations are of assistance in informing the next stages of the Charnwood Local Plan. If any further information or assistance is required please contact the undersigned.</p>	
TLP/98	<p>Here are my views on the land identified for potential development in and around the village of Wanlip. Specifically: PSH72, PSH79 and PSH80. As a resident of the village I have seen the traffic through Wanlip Lane increase year on year as a result of increasing traffic volumes and this is without Broadnook. By building around the village, it will lose its unique historical identity, it will become a token separation between Birstall, Wanlip and Rothley, the community will become less tight knit and the ecology of the area will also be affected. Wanlip is a small village of about 60 homes and adding another 160 would change the community forever. I can see that the land is enjoyed by many walkers and should be continued to be used for this purpose.</p> <p>The village is also not served with a bus service and the nearest amenities are 15-20 mins walk away, making it less sustainable than other areas.</p>	<p>We note your concerns about any future development at Wanlip. No decisions have been made at this stage about any of these sites and their suitability for allocation in the Draft Local Plan as residential sites.</p> <p>The responses received to this consultation will be considered and used to inform the preparation of the Draft Local</p>

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		Plan which will be published for consultation and be accompanied by an appropriate range of evidence, and supporting documents.
<p>TLP/99 IRM Planning on behalf of William Davis and Parker Strategic Land</p>	<p>1. Introduction 1.1 These representations have been prepared on behalf of William Davis and Parker Strategic Land. These companies are working together to bring forward an urban extension to the south of Loughborough on land west of the A4006 Epinal Way, south east of Woodthorpe¹.</p> <p>Scope of Representation 2.1 Our representations cover four specific areas as follows:</p> <ul style="list-style-type: none"> a. The scale of new housing for the Borough; b. The distribution strategy; c. The suitability of Loughborough as a focus for future development and potential future directions for growth; and d. The proposed Local Area of Separation between Loughborough and Quorn. <p>Supplementary Information 1.2 To supplement these representations, and to build upon submissions made to the SHLAA previously, we are submitting a document entitled South Loughborough: A Strategy for Future Development. This provides contextual information, presents an illustrative masterplan and summarises technical assessments prepared by William Davis and Parker</p> <p>¹ In various of the Council's Evidence Base documents this is identified under different references: Alternative Option A in the Core Strategy Sustainability Appraisal, PSH255 in the Market Impact Assessment, Zone 5 in the Landscape Sensitivity and Capacity Assessment.</p> <p>2. The Amount of New Housing to be Provided Housing Requirement 2.1 The Leicestershire Housing and Economic Development Needs Assessment (HEDNA) identifies the level of Objectively Assessed Need (OAN) for housing across the Housing Market Area (HMA).</p> <p>2.2 For the Housing Market Area as a whole, this identifies a requirement of 4716 new dwellings each year between 2011 and 2036. This is derived from the 2014-Sub National Population Projections adjusted to take account of a 10 year migration trend and with the addition of a market signal adjustment to reflect evidence of Affordable Housing Need.</p> <p>2.3 We are aware of representations concerning the HEDNA submitted in respect of the Leicester and</p>	<p>Sustainability Appraisal We note your references to the Sustainability Appraisal in support of your representations on the options for the distribution of future development.</p> <p>We note the additional information provided and your representation relating to land south of Loughborough and the scale and distribution of housing, the suitability of Loughborough and the proposed Local Area of Separation between Loughborough and Quorn. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation</p>

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	<p>Leicestershire Strategic Growth Plan which identified that, in terms of the planned employment growth for the period to 2036, the evidence presented underestimates this likely growth and that there is a mismatch between the aspirations of the LEP and the figures for housing and employment growth presented in the Draft Plan. Moreover, a review of the assumptions on housing growth also indicates a strong case for uplifting the OAN figure. Key issues include that fact that the HEDNA did not consider longer term migration trends over a</p> <p>15-year period and that the affordability and market signal uplifts set out are not sufficiently ambitious. On this basis is it possible that the overall strategic housing requirement for the Housing Market Area will in fact be greater.</p> <p>2.4 Without prejudice to the above, for Charnwood, the demographic based figure is 947 new dwellings each year, to which a 5% adjustment is added to reflect evidence of Affordable Housing Need. This gives rise to an overall requirement of 994 additional dwellings per annum between 2011-2036. For this Plan period, the housing requirement would be 24,850 additional dwellings if the OAN is to be met. This figure is carried forward into the Consultation Document at paragraph 3.1.</p> <p>2.5 It is instructive to note that the (then) DCLG Standardised Methodology for calculating Objectively Assessed Need suggests a housing requirement of 1045 dwellings per annum between 2016-2026 for Charnwood. Whilst this is broadly comparable, over the ten year period referred to, this would amount to an additional 500 dwellings.</p> <p>2.6 Moreover, the HEDNA leaves aside factors related to land availability. This is significant in understanding how the overall housing requirement for the HMA might be accommodated. The Joint Position Statement produced by Leicestershire authorities in March 2018 illustrates an anticipated shortage of housing land in the City of Leicester; estimated to be a third of its OAN. On this basis there will be a need for some 10,000 new homes to be provided in other local authority areas through the Duty to Co-operate. It had been anticipated that an agreed distribution across the HMA would be available earlier in the year but to date this has not been published. It is very possible, therefore, that in addition to its own OAN requirement, additional housing land will need to be identified in Charnwood to meet unmet need from Leicester City.</p> <p>2.7 As such, and for the present time, the housing requirement of 24,850 dwellings must be seen as a minimum. Indeed, this would be consistent with how the draft National Planning Policy Framework expresses the Presumption in Favour of Sustainable Development in the context of plan making.²</p> <p>² Paragraphs 11, 36, 61</p> <p>Housing Supply</p> <p>2.8 Table 2 of the Consultation Document identifies the various components of housing supply over the plan period.</p>	

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	<p>2.9 In the first instance, it is noteworthy that between 2011-17, 4,259 dwellings were completed. This averages a little over 700 dwellings per annum and amounts to a shortfall of 1700 new homes over this six year period. The effect of this is that the requirement increases for the remaining years of the plan period and Government advice is that is backlog should be cleared as soon as possible.</p> <p>2.10 Using the Liverpool methodology, the per annum requirement would increase to 1,337 dwellings per annum for the 5 year period 2017 – 2022. Whereas, under the Sedgefield methodology, the per annum requirement for the remainder of the plan period would be 1,083 dwellings per annum.</p> <p>2.11 Either way, a “step change” is required in housing delivery over the plan period. This is acknowledged as necessary in the BBP Regeneration Study ‘Housing Delivery Scenarios – Market Impact Assessment’. Residual Requirement</p> <p>2.12 Table 2 concludes by identifying that land for 6,451 new homes needs to be found, once completions and commitments are taken in to account. This is known as the residual requirement.</p> <p>2.13 Rightly, reflecting the findings of the BBP Regeneration Study, the Consultation Document accepts that not all of the supply identified will be delivered within the plan period. Accordingly, in defining the residual requirement, the Consultation Document states that land for a minimum of 8,100 new homes will be needed if the OAN is to be met.</p> <p>2.14 However, we welcome the fact that Consultation Document identifies the option of providing a greater supply of land for housing - up to 15,700 new homes - in order to provide greater surety that the housing requirement will be met by providing flexibility to take account of changing circumstances. This is entirely consistent with the importance of improving housing delivery, and as a principle, we support this.</p> <p>2.15 It is instructive to note that even with the higher housing supply estimates set out in this Study, backlog is not cleared until 2026/27. Only where the Council adopts “intervention measures” does the backlog clear earlier, but even then, this is only reduced by one year.</p> <p>2.16 There is no equivalent assessment for how the lower 8,100 residual requirement would address backlog; one can surmise that backlog would only be met at the very end of the plan period, if at all.</p> <p>2.17 On this basis, the higher the residual land supply figure is set, the greater the benefit in terms of meeting the housing requirement in the Borough.</p> <p>2.18 The BBP Regeneration Study also considers potential delivery scenarios. These vary to some extents depending on the distribution strategy assumed, as shown in Figure 43, but in overall terms this demonstrates the main components of housing supply to meet the residual requirement over the period 2017-2036. Each of these scenarios include new strategic sites on the edge of Loughborough,</p>	

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	<p>principally PSH255 at Woodthorpe to the south east of Loughborough, which is the land controlled by William Davis and Parker Strategic Land, and also PSH106 Nanpantan Grange to the south west of Loughborough. It is clear that additional Urban Extensions at Loughborough is central to meeting the housing requirement.</p> <p>3. Distribution of Future Development</p> <p>3.1 The Consultation Document sets out seven potential options for how development might be distributed in the future. These range from an urban focus at Leicester and Loughborough, through more dispersed patterns of distribution and new settlement options.</p> <p>3.2 Option 1 - Leicester and Loughborough Urban Areas: This option would focus development on the key Urban Areas, firstly at the Leicester Urban Area (edge of Leicester, Birstall, Thurmaston and Syston) and then Loughborough Urban Area (Loughborough and Shepshed). The Interim Sustainability Appraisal refers to the SHLAA Capacity at the 'Edge of Leicester' Area to be in the region of 3,350 new homes and for Loughborough (including Shepshed) the capacity is said to be 8,274 new homes. We support the focus of development at Loughborough and expand upon its suitability as a location for development in the following section.</p> <p>3.3 Option 2 - Leicester and Loughborough Urban Areas and Service Centres: This option would focus development on the Urban Areas with a smaller proportion of development focused on the Service Centres. Whilst this is said to focus development at the Urban Areas in the first instance the SA in fact illustrates the distribution moves some of the growth that would occur at Loughborough under the urban concentration option to the Service Centres. We do not support the reduction in provision of Loughborough as part of this approach.</p> <p>3.4 Option 3 - Settlement Hierarchy Distribution: This option would focus development on the Urban Areas and then Service Centres with the remainder of development directed to the Other Settlements. As with Option 2, this approach is based upon reducing development at Loughborough and at the Service Centres in order to accommodate development at other settlements. We do not support the reduction in provision of Loughborough as part of this approach.</p> <p>3.5 Option 4 - Proportionate Distribution: This option would distribute new housing in proportion to the population of each settlement hierarchy tier and would be a more dispersed pattern of development. This reduces the amount of development at the edge of Leicester because proportionately these settlements are smaller and accordingly the SA refers to this as the worst option because of this. We do not support this Option in its present form.</p> <p>3.6 Option 5 - Leicester and Loughborough Urban Areas and New Settlements: Taken together the four new settlements option do not have the capacity to meet the housing requirement, and would need to be combined with other sites to form a development strategy for the Borough. Option 5, therefore,</p>	

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	<p>includes development at Leicester Urban Area and maximising the potential for development of new settlements. The remainder of development would be focussed at Loughborough Urban Area. Here the new settlements(s) are given primacy over development at Loughborough and other settlements. The risk associated with new settlements and their limited material contribution to housing land supply in the plan period must be recognised and we do not support this approach.</p> <p>3.7 Option 6 - Leicester and Loughborough Urban Areas and Service Centres and New Settlements: Similar to option 5 the remainder of development after the Leicester Urban Edge and the new settlement(s) would be distributed between Loughborough Urban Area and Service Centres. For the reasons set out in para 3.6, we do not support this approach.</p> <p>3.8 Option 7 - New Settlements: This option would focus development on a single standalone new settlement with 8,000 to 10,000 new homes, the location of which would be identified through the Local Plan. It is instructive to note that the Sustainability Appraisal considers that a focus on a large standalone new settlement is unlikely to deliver housing before 2030 and therefore unlikely to meet housing need in the period covered by the new Local Plan. The Sustainability Appraisal does not consider this to be a reasonable alternative and may only represent a longer-term strategy for Charnwood's development needs beyond 2036. We do not support this approach.</p> <p>3.9 The Sustainability Appraisal illustrates in general terms that the greater the scale and concentration of development at the urban areas the greater the significant positive benefits. Conversely, the more dispersed the pattern of development the lower the potential environmental effects and the less positive social and economic benefits occur. This requires balanced judgement to be exercised in determining a development strategy.</p> <p>3.10 The extent to which these effects are in fact likely will depend on firstly the scale of development chosen that the extent of concentration / dispersal contained within a spatial strategy.</p> <p>3.11 In this regard, the BBP Regeneration Study describes the Loughborough sub-market area as follows:</p> <p>"[it] offers highly convenient access to quality of life attractions (cultural, leisure, and/or natural assets), and highly convenient access to employment, education and or/amenities....in future, housing demand may increase in line with new employment opportunities there may be demand for more aspirational housing offer relative to the current submarket area"</p> <p>3.12 In broad terms, housing need by share of households indicates that a third of future housing provision should be provided at Loughborough (excluding Shepshed). This equates to between 300-350 new homes each year – which is over twice as many as built over recent (Figure 11). Significantly, the 'Assumed Market Absorption Capacity' is considered to be greater than this, at between 350-400 new</p>	

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	<p>homes each year. The 'Residual Market Absorption Capacity' for the period 2017/18 to 2035/36 is said to be almost 8,000 new homes at Loughborough (excluding Shepshed). This illustrates that Loughborough is able to absorb additional development over the plan period.</p> <p>3.13 On this basis, a version of the distribution strategy that maximises development at both the 'edge of Leicester' and 'Loughborough/Shepshed' and then distributes balanced development based on a proportionate approach to 'Service Centre' and 'Others' would appear appropriate. Taking the housing capacities for these locations together, the overall scale of housing provision would be in the region of 15,000 new homes</p> <p>4. Role and Function of Loughborough</p> <p>4.1 Loughborough is the largest and most significant settlement in Charnwood Borough owing to its wide employment and retail offering and the range of transport modes. Together with the smaller town of Shepshed, Loughborough forms part of a wider urban area acting as a social and economic hub in the north of the Borough. The town is also home to Loughborough University which is one of the highest ranking universities in the UK.</p> <p>4.2 Loughborough benefits from excellent rail links and vehicular access, located to the eastern side of the M1, connecting north to Nottingham and south to Leicester. Significant investment is planned for this area up to 2031, including improvements to Junction 23 of the M1. Furthermore, the majority of Loughborough's catchment benefits from bus links of hourly frequency or more during the day, midweek. In addition, the town includes three economic growth areas (Loughborough & Leicester Enterprise Zone, Loughborough University and Life Sciences Opportunity Zone) as outlined in the Midlands Engine Strategy.</p> <p>4.3 Loughborough serves as an existing social and economic focus in the wider region, is located in close proximity to significant existing and planned infrastructure along the M1 and has strong ties to Leicester.</p> <p>4.4 It has consistently been identified in successive development plan strategies as a focus for development within the Borough on the basis that it is a sustainable location for new development. The Inspector who conducted the Examination into the Core Strategy noted that the development strategy rightly seeks to steer the majority of new development to the larger urban areas (the fringe of Leicester and Loughborough and Shepshed) which provide the best access to jobs, services and public transport. Plainly this role should continue.</p> <p>Directions of Growth</p> <p>4.5 The majority of growth which is currently planned for Loughborough is located to the north west of the town in the form of the Strategic Urban Extension which will provide new housing, further services and facilities to compliment the town and a new Science and Enterprise Park. Development here has</p>	

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	<p>yet to commence and the Housing Trajectory at Appendix D of the BBP Regeneration Study refers to development commencing in 2019.</p> <p>4.6 Development in this location will, because of the scale of the strategic urban extension, extend throughout and beyond the plan period; the BBP Regeneration Study itself assumes the build period extends beyond 2036. Because of this, there is no meaningful opportunity for additional development to be located on the north west sector of the town within the plan period.</p> <p>4.7 Other locations around the town as options for future development were considered during the process of preparing the Core Strategy. It is instructive to note that land to the east and west of Loughborough both performed poorly in the Sustainability Appraisal; both are considered to have adverse landscape and ecological effects. The Inspector who conducted the Examination into the Core Strategy drew similar conclusions about the effects of development in these locations.</p> <p>4.8 In contrast the Sustainability Appraisal identifies the relative positive advantages of development to the south of Loughborough due to its proximity to the town centre. Consistent with the Core Strategy Inspector's view, the principal issue is the scale of development that can be accommodated in this location due to the proximity of Quorn. In the context of the up to date assessment by Arup³, the potential area for development without causing coalescence is now defined and better understood.</p> <p>4.9 In landscape terms, we note that the earlier Landscape Character Assessment identified Zone 5 corresponds with the land promoted by William Davis and Parker Strategic Land and is considered to have Medium High capacity to accommodate development. Clearly this location is now further influenced by the residential development at Grange Park and Trinity Gardens and also the retail uses under construction off Woodthorpe Roundabout.</p> <p>4.10 In the Strategic Housing Land Availability Assessment, the land concerned is identified as Site PSH255. The Proforma Response records the following:</p> <p>Suitability -There are no known irresolvable physical/environmental constraints preventing development, the site is in a suitable location for development adjacent to Loughborough and a suitable access can be achieved.</p> <p>Availability -The site does not have planning permission but has strong developer interest.</p> <p>Achievability -It is essential that the applicant provides clear evidence that the site is also achievable against the criteria set out in the SHLAA document. This will establish whether the site has a reasonable prospect of being delivered.</p> <p>4.11 The accompanying Submission demonstrates how the development opportunity in this location is achievable.</p>	

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	<p>4.12 Each of the Delivery Scenarios in the BBP Regeneration Study include development at PSH255 Land at Woodthorpe, East and West of A6004 Epinal Way with an estimated capacity of 1140 dwellings. Appendix D of that Study refers to a housing trajectory with development commencing in 2023/24 and built out by 2032/33.</p> <p>4.13 For each of the reasons above, we support the inclusion of land in this location as an allocation in the Local Plan Review.</p> <p>³ Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation</p> <p>5. Proposed Area of Local Separation</p> <p>5.1 The Consultation Document proposes a new Area of Local Separation between Loughborough and Quorn. We do not support this as delineated in the Consultation Document for the reasons given in the following paragraphs.</p> <p>5.2 The 2004 Local Plan identified an area of Green Wedge between Loughborough and Quorn derived from criteria in the earlier Structure Plans.</p> <p>5.3 A review of Green Wedges was undertaken in 2011 to inform the then emerging Core Strategy in the context of more relevant up to date criteria. This found that the designation in this location was no longer justified. Accordingly, the 2015 Core Strategy does not designate land between Loughborough and Quorn as a Green Wedge.</p> <p>5.4 In 2016, the Council commissioned further research in the form of a Study entitled ‘Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation’. In respect of Areas of Local Separation this designation is referred to in the following manner:</p> <p>“An area of open countryside that separates two neighbouring settlements, whose main purpose is preserving settlement identity, and which is based on landscape character and visual appearance of the area” (Section 3.1.2, page 5).</p> <p>5.5 The Study further explains that this designation typically applies to small areas of countryside which prevent coalescence of settlements, maintaining their unique character and identity and their remit is narrower than Green Wedges.</p> <p>5.6 The area between Loughborough and Quorn was considered in this assessment – referred to as PALS -1. The assessment focused on whether the area physically separates settlements and the extent to which this separation is at risk of being compromised.</p>	

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	<p>5.7 For PALS-1, the Key Findings shown on Page 45 record the contribution as WEAK, setting out the following conclusions:</p> <ul style="list-style-type: none"> • provides a less critical gap between Loughborough and Quorn and between Quorn and Woodthorpe due to the area's extensive scale and the lack of intervisibility between settlements; • the central part of the gap between Quorn and Loughborough/Woodhouse (around the A6/A6004) would be more at risk of compromise; • the northern and south-western parts of PALS-1, have limited visual and functional connectivity within the surrounding settlements and greater linkage with the wider countryside; and • although these areas effectively form part of the physical gap between Loughborough and Quorn, they play a lesser role in preventing coalescence between the settlements. <p>5.8 Section 5.1.2 of the Study explains that the Zones of Weakness make a lesser contribution to maintaining the separation between settlements. It goes on to state: "the proposed scale of PALS-1 was narrowed through the assessment process to focus on a particular corridor where the gap between Loughborough and Quorn would be more sensitive to compromise".</p> <p>5.9 These findings are shown pictorially in Appendix 1 of the Study on Drawing 5.1a entitled 'Assessment Findings'. This shows the Zone of Weakness and the Proposed Area of Local Separation. The recommended area for Proposed Area of Separation is shown again on Drawing 5.1a entitled 'Recommended Designation'. The Assessment Proforma on Page 78 of the Study is consistent with this.</p> <p>5.10 In contrast with this, Appendix B of the Consultation Document proposes that an extensive tract of land between Loughborough and Quorn is designated as an Area of Local Separation. Although this is not on an OS base, when compared with the Arup Study, it is clear that this is proposed to cover a larger area of land that this considered to be the important gap between these settlements.</p> <p>5.11 Moreover, in establishing the extents of an area of separation the Study defines criteria that each area needs to meet. The methodology relating to Areas of Local Separation notes, on page 24, that an area of separation should take consideration of 'landscape scale/pattern, topography, development patterns and views'. Section 4.4 goes on to note that "Identifying durable, clearly identifiable physical boundaries which may be used to clearly define designations is an important consideration for the ability of those designations to perform in the context of a sustainable development strategy."</p> <p>5.12 Section 4.4 goes on to identify features that constitute a 'durable' boundary, namely infrastructure such as motorways, public and made roads, rail lines, natural systems such as watercourses, woodland, historic field boundaries and existing development. It states that poorly defined field boundaries are examples lacking durability.</p>	

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	<p>5.13 As such, to accord with the criterion established above, the Area of weakness identified for PALS-1 should be extended north to the line of the A6004. The A6004 in combination with the Great Central Railway provide a more 'durable' boundary for the southern and western extents of the area of separation as defined by the study. Indeed page 78 of the study notes that the current boundary has been aligned with "...a small hedge – lined track towards main street." It is our view that in context with the A6004 and the Great Central Rail Line this 'small hedge' boundary does not in comparison provide a 'durable' boundary.</p> <p>5.14 The A6004 and rail line mark clearly identifiable physical boundaries and will continue to enable the Local Area of Separation to perform its role in the context of a sustainable development strategy.</p> <p>5.15 The current gap between Quorn and Loughborough measures circa 1000m at its narrowest point. The intervening land comprises of gently rolling arable fields with hedged field boundaries containing a modest number of hedgerow trees. To the immediate west of Quorn, the existing playing fields in use by Loughborough Grammar School mark a clear boundary to the settlement. The boundary of the playing fields and Woodhouse Road includes a strong belt of trees which effectively limit inter-visibility west towards Loughborough. Views between the two settlements open up marginally as one moves south towards the Manor House at Quorn and to the north along Loughborough Road. In addition to the planting along Woodhouse Road a low ridge running south west to north east through the intervening land further limits views towards the edge of Loughborough. To a similar extent planting along the Great Central Railway, which bisects the intervening land in a north to south direction provides further screening. Cutting as it does through the landscape the Great Central Railway provides a strong physical feature providing a perceptual sense of separation between the two settlements.</p> <p>5.16 There are few places where the public can experience the sense of separation between settlements. Those opportunities that exist include Public Rights of Way 17/2 and 35/2 which pass between Loughborough and Quorn and to a lesser extent from A6004 to the north. Views from the A6004 are in a large part screened by roadside vegetation however a few locations such as the rail overbridge afford more open views.</p> <p>5.17 It is our view that development to the south of Loughborough could be accommodated on land up to the edge of the great Central Railway whilst maintaining a strong sense of separation between Loughborough and Quorn. Whilst development would narrow the physical gap to circa 600m a sense of separation between the two settlements would remain. In particular, walkers passing between the two settlements along PROWs and motorists and walkers along the A6004 will continue to experience a sense of separation. They will pass from one settlement through a 'countryside gap' before entering another. It is our contention that the Great Central Railway naturally defines and contains Loughborough. Moreover, additional woodland and screen planting implemented as part of the development would add further intervening layers of screen vegetation between the two settlements and in doing so will reinforce existing screen planting and visual separation.</p>	

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	<p>5.18 Finally, it is not necessary for the existing Area of Local Separation to the north of Woodthorpe to be contiguous with a new Proposed Area of Local Separation.</p> <p>5.19 For these reasons this aspect of the Consultation Document is not justified.</p> <p>6. Summary and Conclusions</p> <p>6.1 These representations have been prepared on behalf of William Davis and Parker Strategic Land who are working together to bring forward an urban extension to the south of Loughborough on land west of the A4006 Epinal Way, south east of Woodthorpe.</p> <p>6.2 The Consultation Document has adopted the figure of Objectively Assessed Need derived from the Leicestershire Housing and Economic Development Needs Assessment, namely 24,850 additional dwellings between 2011 and 2036.</p> <p>6.3 However, it remains necessary for the unmet need from the City of Leicester to be determined and distributed amongst adjoining local authority areas. It is very possible that the amount of housing to be provided within Charnwood will need to be greater.</p> <p>6.4 The Consultation Document identifies that, as a minimum, land is required for at least 8,100 new homes, but the Charnwood Delivery Evidence suggests that the Local Plan consider providing land for up to 15,000 new homes to ensure flexibility to take account of changing circumstances. We support this principle to ensure surety that the future land supply will meet the strategic housing requirement.</p> <p>6.5 Within the context of this higher growth strategy, given the merits and advantages of focusing development at Loughborough/Shepshed, the distribution strategy that is taken forward should maximise development capacity in this location in the first instance, as is proposed in Option 1. However, to provide additional land and surety referred to above, the strategy can also direct further development on a proportionate scale to Service Centres (Option 3) and Other Settlements. This blended distribution would represent a sustainable and appropriate distribution strategy.</p> <p>6.6 To contribute towards this strategy, we are proposing that land south east of Woodthorpe, west of A6004 Epinal Way is allocated as a strategic urban extension. The accompanying Submission illustrates how development can be accommodated in this location.</p> <p>6.7 It follows that we do not agree that the proposed Area of Local Separation identified at Appendix B of the Consultation Document is appropriate. The evidence base associated with this in fact identifies an area of land that could be developed without leading to coalescence between Loughborough and Quorn. In this location, the railway line represents a physical boundary that should form the basis of any such designation after future development needs have been taken into account.</p>	

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<p>TLP/100 Carter Jonas LLP on behalf of Leicestershire County Council</p>	<p>Further documents/information submitted with representation ref: TLP/99</p> <p>1. INTRODUCTION</p> <p>1.1 This representation is made on behalf of Leicestershire County Council (LCC) as the owner of property interests at Quorn and in support of the promotion of a 2.2 hectare potential employment site at Barrow Road and Poole Farm. They have been prepared by Carter Jonas LLP on behalf of LCC in response to the “Towards a Local Plan for Charnwood Consultation.” The consultation has been undertaken to explore the scale of development needed in the Borough as well as key issues and opportunities which need to inform the overall development strategy. Charnwood Borough Council (CBC) is also seeking the views of stakeholders on key aspects of the evidence base which have helped formulate the issues and options identified in the “Towards a Local Plan for Charnwood – Discussion Paper” (April 2018). This contains a number of questions to be considered in responses to the consultation, including:</p> <p>Are there any reasonable alternatives that can accommodate the need for homes and jobs?</p> <ul style="list-style-type: none"> • Do you have any comments on how the reasonable options have been sustainability appraised? • Can you put forward any additional land that has not been identified by the Council? • Do you think that the Council’s vision is correct? Are there parts of it that need to change or could be added to? • What evidence do you think the Council needs in order to identify its development strategy to 2036? <p>1.2 LCC owns approximately 2.22 hectares of land at Poole Farm and Barrow Road in Quorn north of the A6. These sites are edged red in the attached site location plan (Appendix 1). They are available now, offer a suitable location for development now, and can be viably developed now. Appendix 2 contains proposed site layout plans which shows how the land parcels could deliver new commercial development in use classes B1(c) (light industrial), B2 (general industrial), and B8 (storage and distribution). The land has not been previously promoted and was not included in previous land availability assessments carried out CBC. Accordingly, and noting the invitation in paragraph 2.10 of the Discussion Paper, Leicestershire County Council would request that Charnwood Borough Council considers this site for commercial development as a preferred location for new employment growth.</p> <p>1.2 This document contains responses on behalf of Leicestershire County Council to the relevant topics raised in the consultation documents. Specifically, comment will be offered on the level of employment need (both quantitative and qualitative), the proposed options for the distribution of new employment development over the plan period, the settlement hierarchy, settlement boundaries, and the planning merits of the subject site.</p> <p>1.3 For the avoidance of doubt Leicestershire County Council provides these comments in its capacity as a landowner and in no other.</p>	<p>We note your comments in support of a potential employment site at Barrow Road and Poole Farm. The responses to the consultation will inform the Draft Local Plan which will be published for consultation</p>

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	<p>2. THE DEVELOPMENT STRATEGY</p> <p>2.1 Chapter 3 of the Discussion Paper sets out comments on employment need and supply. Paragraph 3.7 states that the Charnwood Employment Land Review (2018) (ELR 2018) recommends that 66 hectares of employment land is provided over the next plan period to meet market demand. Table 3 assesses employment need and supply in Charnwood from 2011 to 2036. Overall, it measures employment need against sources of supply including completions, outstanding commitments, and “allocations” in the adopted Core Strategy.¹ Table 3 reports a surplus of 3.46ha of employment land overall and a surplus of 10.14ha against requirements, although these are rather counterintuitively expressed as negative figures.</p> <p>2.2 This shows that, having regard to the findings of the ELR 2018, there is sufficient land from outstanding commitments and locations for growth identified in the Core Strategy as well as completions between 2011 and 2017 to provide for identified needs over the next plan period. As the Discussion Paper notes, however, there are qualitative issues such as type and location to consider as well as quantitative issues. The ELR 2018 furthermore only provides a “policy-off” minimum figure. It is both possible and appropriate for the Council to plan for additional employment land as part of the plan-making process.</p> <p>2.3 The Charnwood Local Plan Core Strategy (2015) contains a policy on Rural Economic Development (Policy CS 10). This does not allocate land for commercial use, but it plans for approximately 7ha of employment land to be distributed between designated Service Centres (including Barrow and Quorn) up to 2028. Policy CS 10 is silent as to the distribution of this land between the various Service Centres. It is noted that in the proposed settlement hierarchy both Quorn and Barrow retain their status as Service Centres in the Settlement Hierarchy Assessment (2018), which is supported and can be robustly justified having regard to the evidence base. This higher order status in the settlement hierarchy underlines the need for these settlements to continue to provide a role in supporting employment growth in Charnwood.</p> <p>2.4 Paragraph 28 of the National Planning Policy Framework (2012) states that planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. It also states that to promote a strong rural economy, local plans should support the sustainable growth and expansion of all types of business and enterprise in rural areas as well as promoting retention and development of local services and community facilities in rural locations.</p> <p>2.5 The ELR 2018 identifies a total of two employment sites in Quorn both totalling approximately 4ha. Some 3.3ha of this land is a site at Farley Way, Quorn which has been promoted through the local plan process for employment use and at present has no planning status. The Farley Way site lies to the south of the A6 and is abutted by a dense pattern of residential development on two sides. An outline planning application for up to 48 dwellings has been submitted by LCC on this site and is currently</p>	

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	<p>pending determination under local planning authority reference number P/17/1851/2. Given the prevalence of existing residential development in close quarters, this would be a more logical use of this site than for an industrial purposes and means that it is unlikely in the current circumstances the site at Farley Way will be delivered for commercial development.</p> <p>¹It is our understanding that the Core Strategy did does not allocate land per se and this was intended to be picked up in subsequent Site Allocations Document the preparation of which has been rolled into work on the emerging Local Plan</p> <p>2.6 Approximately 0.7ha of land in Quorn is occupied by an existing single-use B1(c) tenant in the built-up area of the settlement. In terms of attractiveness to future users and compatibility with surrounding uses this site is ranked as “poor” by the ELR 2018. The ELR 2018 records no existing planning permissions in Quorn. The only substantial commercial use is noted as a single-use B1(c) premises which, due to its poor quality, is anticipated by the ELR to be unattractive to any subsequent occupier. The ELR refers to no other existing or planned employment sites in Quorn. In terms of other Service Centres, it does not appear to refer to any forthcoming supply of employment land either by way of allocations or planning permissions.</p> <p>2.7 From the appraisal in the ELR 2018, it is evident that a number of the employment sites in Service Centres are existing premises. The ELR 2018 ranks many of these as “poor quality” and some are suggested for release to other uses. CBC’s Annual Monitoring Report (AMR) 2016/17 projects the delivery of 7ha of employment land in Service Centres (the 2015 Core Strategy’s target) up to 2028 but makes no references to the sources of the supply. It is important to note that the Core Strategy (2015) does not identify or allocate employment sites in the Service Centres beyond making provision for approximately 7ha of land over the plan period to 2028. It is not clear how these are to be delivered in the current policy context given that most potential sites, as with LCC’s site in Quorn, are subject to the countryside protection policies of the Charnwood Local Plan (2004) the settlement boundaries of which have not been adjusted to accommodate the needs identified in the Core Strategy. It is evident from the information published to the Council that employment land is not quick to come forward in Service Centres and there is a trend towards these sites failing to sustain market interest and being released for other uses. Allocating new suitably-located land in Service Centres for employment is an expeditious way to offset this negative trend which will increase incidences of outward commuting. Making provision for new employment land in Service Centres will encourage rural economic development in line with the aims and objectives of paragraph 28 of the NPPF 2012 as well as the principles of sustainable development.</p> <p>Employment Strategy Options</p> <p>2.8 In terms of paragraph 4.51 of the Discussion Paper, it is wrong to suggest that there are employment sites “committed” by virtue of the existing Core Strategy (2015). The Core Strategy (2015) does not allocate sites. In the case of Service Centres in particular, it merely makes provision for 7ha of</p>	

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	<p>employment land in these locations but clearly this amount of land will not be delivered whilst settlement boundaries designed by the Charnwood Local Plan 2004 remain in effect. If 7ha of employment land is to be delivered in Service Centres thereby creating sustainable and proportionate economic growth in rural areas, it is essential the existing Core Strategy's target of approximately 7ha be carried through to the new local plan and be translated into allocations which are clearly identified. None of the options set out in the Discussion Paper achieve this outcome.</p> <p>2.9 Option 1 ("rely on existing employment allocations in the Core Strategy and the 2004 Local Plan") is based on the false premise that the Core Strategy allocates sites. The adopted CS does not allocate sites in respect of Service Centres but only introduced a general target of 7ha up to 2028 and identifies no land to meet this target. In order to plan for a sustainable amount of employment growth in Service Centres over the next plan period it is necessary to plan and allocate sufficient employment sites in Service Centres. As a result, relying on existing employment allocations is not a viable or sustainable option to deliver balanced growth across the Borough which would promote local employment and sustainable communities. Paragraph 37 of the NPPF states that:</p> <p>Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.</p> <p>2.10 Option 2 relates to identifying new employment land to facilitate regeneration. The premise of this option is to release poorer quality employment sites for alternative uses and to bring forward 10ha of employment land north of Leicester in compensation. As mentioned above and reflected in the ELR 2018, many existing employment sites in the Borough's Service Centres are not competitive and are poor quality. This situation is leading to a trend of employment uses diminishing in such locations which has led the ELR 2018 to recommend safeguarding a number of existing employment sites in and around Service Centres. It has recommended that some employment sites be released for other uses. However, even safeguarded sites cannot be retained in the long-term if there is a lack of market demand. LCC's site at Quorn is ideally situated in relation to the strategic road network (namely the A6) and sits apart from residential and other sensitive uses. It is possible to invest in high quality premises which will attract occupiers thus generating local jobs and economic growth in a sustainable location.</p> <p>2.11 Option 2 fails to make compensatory provision for the loss of low quality employment uses in Service Centres and would rather concentrate new provision on the northern fringe of Leicester. This approach would demonstrably fail to support the rural economy and rural job growth contrary to the principles of sustainable development and paragraphs 28 and 37 of the NPPF. It would also lead to increased outward commuting and fail to plan for a balance of land uses in rural settlements, contrary to the general principles of sustainable development. It is not debated that the Service Centres have a number of poor quality industrial premises as per the findings of the ELR 2018, but options should be explored to release new land in Service Centres to compensate for the loss of these sites to other uses.</p>	

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	<p>In the context of Quorn which generally has low quality employment provision, LCC's site represents an ideal opportunity to increase the general quality and amount of employment provision in Charnwood's rural area.</p> <p>2.12 Option 3 involves not planning for any further employment land except for 10ha of large warehousing. Whilst it is noted that the Council considers at this stage that it has a sufficient supply of small-scale industrial uses over the current and the next plan period, the Discussion Paper correctly notes that qualitative issues also need to be explored. One such qualitative issue is location. The Core Strategy (2015) recognised the importance of planning for employment uses in Charnwood's Service Centres and rural areas to reflect the aims and objectives of the NPPF by supporting rural economy and providing local jobs. This approach should be carried forward into formulating the new local plan. Some 10ha of largescale warehousing development delivered in one location on the strategic highway network will be more likely to cater to and attract employees and employers from locations outside of the Borough rather than providing a source of local employment and space for local businesses to establish and expand.</p> <p>2.13 In recognition of the above, the options set out in respect of the distribution of employment development need to take full account of supporting rural employment and plan for a proportionate level of growth on the edge of Service Centres. Not to do so would be inconsistent with the NPPF and the principles of sustainable development. As a result, Leicestershire County Council does not support any of the options for meeting employment needs set out in the Discussion Paper. It requests that when formulating its preferred options that CBC consider the importance of making allocations for new employment development on the edges of Service Centres for the purposes of promoting rural employment and promoting balanced development in Charnwood's rural area. Whilst the evidence base suggests that quantitative employment need can be met, this should be understood as a minimum amount and not a ceiling. Employment provision in rural areas can have positive economic, social, and environmental effects and was planned for in the adopted CS. It is appropriate to continue this strategy in the emerging Local Plan through identifying new allocations of land for employment use in and on the edge of the Service Centres.</p> <p>2.14 Referring to the Settlement Hierarchy Assessment 2018 Quorn's designation as a Service Centre is contingent on the settlement having good accessibility to employment. Some of the housing options out in the Discussion Paper would see Service Centres play a key role in meeting housing need over the plan period and Appendix D to the Discussion Paper suggests that land is available for 674 new dwellings in Quorn alone. In order for the Service Centres including Quorn to meet the need for new homes over the next plan period (it is clear that some housing growth will need to be permitted in Service Centres to maintain the viability and vitality of these settlements) it is necessary to retain and deliver a balance of land uses in these locations and provide the conditions that will allow new and existing commercial uses to thrive. Additionally, given the potential for Service Centres to accommodate new housing growth, it is appropriate to consider bringing forward employment allocations in these</p>	

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	<p>areas which would underpin new residential growth over the plan period by reducing outward commuting and providing locally-accessible services and employment opportunities. As mentioned above, the adopted CS makes provision for 7ha of employment land in Service Centres up to 2028 and similar opportunities to encourage new employment uses in Service Centres should be taken up when formulating the preferred options for the emerging Local Plan.</p> <p>3. SITE ASSESSMENT</p> <p>3.1 A completed Strategic Housing / Employment Land Availability Assessment Site Suggestion Proforma 2018 is contained in Appendix 3. The planning merits of the subject site are explored in more detail below.</p> <p>3.2 The site is considered to have negligible landscape value. The Poole Farm site is occupied by unsightly and dilapidated outbuildings. The larger Barrow Road site is surrounded by large roads and visually severed from the wider rural landscape by these physical features. Both sites offer the potential for the introduction of further screening along the boundaries. In addition to this, the site is not subject to any local, national, or statutory landscape designations. It is noted that the Council's evidence base has suggested the introduction of a "Local Area of Separation" between Loughborough and Quorn. This extends to include the treed area of the Poole Farm site but not the site itself nor does it include the Barrow Road sites. There are no natural or ecological designations on either the Barrow Road or Poole Farm sites.</p> <p>3.3 The Poole Farm site lies within Flood Zone 2 and 3 although predominantly in Flood Zone 2. A Flood Risk Assessment (FRA) has been carried out and demonstrates that it would be straightforward to mitigate the effects on the development in this regard through setting the finished floor level a minimum of 600 mm above the average site level and maintaining a Flood Management Plan once the site is occupied.</p> <p>3.4 The subject site is located some 1.2km to the north of Quorn centre, and accessed by way of either the A6 off-slip from the eastbound carriageway from Quorn and the A6 westbound carriageway by way of the A6 overbridge, or from Barrow Road which routes from the east and Barrow Road itself, the centre of which is just over 1.5km from the sites. The sites are located 1.5km from the centre of the adjoining settlements and as such distances may be assessed against the consent of Manual for Streets which states that walking offers the greatest potential to replace short car trips, particularly those under 2km. In location terms, the sites are within reasonable walking and particular cycling distance of both Quorn and Barrow. Reduction in future car bound trips can also be provided and secured by way of a Travel Plan.</p> <p>3.5 Some infrastructure improvements will need to be made to accommodate pedestrian access, but this is possible to do within land owned by Leicestershire County Council or the public highway. The access drawings in Appendix 4 demonstrate how this can be accomplished through the provision of new</p>	

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	<p>footway links and pedestrian crossings along Barrow Road and up to Poole Farm. There is a slight discrepancy between the access drawing and the site layout plans with regard to the larger Barrow Road site. In terms of access arrangements, the access drawing for this land attached in Appendix 4 takes precedence.</p> <p>3.6 The site's agricultural land grade, according to the high level maps published by Natural England, is either "good" or "poor." Further site-specific technical work is needed to inform this, however, it should be noted that the NPPF 2012 does not require local planning authorities to consider the "best and most versatile" agricultural land to represent an absolute constraint. Rather, it requires local planning authorities to "take account of the economic and other benefits" of the best and most versatile agricultural land. Clearly the scheme that is being promoted will bring its own, countervailing economic benefits which should be weighed against the need to retain the "best and most versatile" agricultural land should this apply to the subject site.</p> <p>3.7 In terms of delivery, the site is in a single ownership and controlled by Leicestershire County Council, who will be the developer. The site is deliverable within the next five years and is available now. Leicestershire County Council has undertaken due diligence work and established the scheme's viability which will be supported by the strong demand for small to medium sized industrial units along the A6 corridor. The site would generate numerous sustainability benefits including the delivery of new jobs in a sustainable location resulting in a net economic benefit to the surrounding area and providing a local source of employment to support the existing and future residents of Quorn, Barrow, and the surrounding hinterland.</p> <p>Further documents/information submitted with representation ref : TLP/100</p>	
<p>TLP/101 Peter Bretts on behalf of Barwood Development Securities Ltd (Sileby)</p>	<p>On behalf of our client Barwood Development Securities Ltd., we wish to make the following representations in respect of the above consultation document. Our client has an interest in land at Peashill Farm, Sileby, shown outlined in red on the attached plan. We consider this land to be eminently suitable, achievable and deliverable for sustainable residential development of approximately 150 dwellings, as a second phase of development following the grant of planning permission earlier in 2018 for Phase 1, comprising 170 dwellings.</p> <p>Proposed Settlement Hierarchy (Table 1, page 10, Discussion Paper) We agree with the inclusion of Sileby as one of six Service Centres, with only Loughborough (an 'Urban Centre') and Birstall, Shepshed, Syston and Thurmaston ('Urban Settlements') above them in the hierarchy.</p> <p>Housing Strategy Options (Paragraphs 4.4 – 4.9, Discussion Paper) We support the position in paragraphs 4.5 – 4.7 of the Paper where a higher growth scenario, providing for an additional 15,700 homes up to 2036 (over and above existing commitments), is proposed. We do not support the alternative, minimum provision of an additional 8,100 homes described in paragraph 4.4.</p>	<p>We note your comments in relation to land at Peashill Farm, Sileby and on the settlement hierarchy and housing strategy options. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>We also note the additional information provided.</p> <p>The responses to the consultation will inform the Draft</p>

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	<p>The higher growth scenario would provide the right balance to meet needs and ensure flexibility and control, thereby avoiding the Plan becoming out of date whilst also protecting Charnwood's environment.</p> <p>We also note that the Government's new standard methodology for calculating housing need, when adopted, is likely to result in increased housing need for Charnwood and for the city of Leicester. Future consultation on growth options in the emerging Local Plan will need to provide for such increased needs.</p> <p>Broad Locations for Housing Development (Paragraphs 4.10 – 4.50, Discussion Paper) We comment as follows on the seven options described:</p> <p>Option 1: Leicester and Loughborough Urban Areas We do not support this option, as relying on these areas alone will not be sufficient to accommodate the higher growth scenario described above.</p> <p>Option 2: Leicester and Loughborough Urban Areas and Service Centres We support this option as it would provide for sustainable development at Sileby, including our client's site, as well as accommodating the higher growth scenario.</p> <p>Option 3: Settlement Hierarchy Distribution As with option 2, this option would provide for sustainable development at Sileby, but in smaller settlements (the 'Other Settlements' within the proposed hierarchy) it may result in development without the critical mass needed in order to improve infrastructure.</p> <p>Option 4: Proportionate Distribution As with option 2, this option would provide for sustainable development at Sileby, but allowing for development in 'Small Villages and Hamlets' is unlikely to be the most sustainable development option.</p> <p>Option 5: Leicester and Loughborough Urban Areas and New Settlements Reliance on new settlements adds considerable uncertainty about delivery and delay as no location for a new settlement has been identified to date and new settlements do not benefit from existing infrastructure. This option would also fail to accommodate the higher growth scenario and we do not support it therefore.</p> <p>Option 6: Leicester and Loughborough Urban Areas and Service Centres and New Settlements As with option 2, this option would provide for sustainable development at Sileby, but reliance on new settlements adds considerable uncertainty about delivery and delay as no location for a new settlement has been identified to date and new settlements do not benefit from existing infrastructure. This option would also fail to accommodate the higher growth scenario and we do not support it therefore.</p> <p>Option 7: New Settlements Reliance on new settlements adds considerable uncertainty about delivery and delay as no location for a new settlement has been identified to date and new settlements do not benefit from existing infrastructure. This option would also fail to accommodate the higher growth scenario and we do not support it therefore.</p>	<p>Local Plan which will be published for consultation.</p>

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	<p>SHLAA 2018 We attach an updated 2018 SHLAA form relating to the site, to reflect the latest site conditions and circumstances. The Peashill Farm land is sustainably located and well related to the existing form and character of Sileby, as follows:</p> <ul style="list-style-type: none"> . our client already has planning permission for residential development (170 dwellings) of Peashill Farm Phase 1 which lies immediately adjoining the site; . the principle of developing in this locality has previously been accepted therefore and our client has shown a commitment to delivering high quality development in Sileby; . as well as Phase 1 to the west, there are also strong defensible boundaries to the north (Ratcliffe Road), east (an existing watercourse and field boundary) and south (existing development and field boundary); . the site has good accessibility in terms of the highway network, via Ratcliffe Road and the A46; . bus services provide connections from the site to the rest of Sileby and beyond to Leicester; . a new pedestrian and cycle access is being provided through Phase 1, reducing the walking and cycling distance to the centre of Sileby; and . the site is therefore within easy reach of the employment, retail and other services provided in Sileby, other nearby settlements and further afield in Leicester and Loughborough. <p>The SHLAA form also confirms there are no overriding technical, environmental or ownership constraints which would preclude residential development of the site and that such development is suitable, achievable and deliverable within the next 5 years, thereby helping to meet Charnwood's short term housing needs and sustainable growth aspirations.</p> <p>Settlement Limit For all the reasons set out above, our client's site at Peashill Farm Phase 2 should be included within any defined settlement limit of Sileby.</p> <p>We trust these representations are helpful at this stage and we look forward to further involvement in the consultation process over the next few months.</p>	
<p>TLP/102 Pegasus on behalf of Davidsons Developments</p>	<p>1. INTRODUCTION 1.1 These submissions are prepared on behalf of Davidsons Developments Limited who have interest in land at East Road, Wymeswold. The site is related to the SHLAA site reference PSH167 and has a developable area to provide approximately 45 dwellings.</p> <p>2. VISION FOR CHARNWOOD IN 2036 2.1 The Core Strategy Vision for Charnwood 2011-2028 outlines that the demand for housing will be focussed on Loughborough and the edge of Leicester. The vision highlights Loughborough as the main economic, social and cultural heart of the Charnwood Borough. The focus on Loughborough as the</p>	<p>We note your comments in relation to land at Wymeswold on Vision for Charnwood, Areas of Local Separation and Green Wedges, the Settlement Hierarchy and Settlement Limits and the Housing Strategy Options. The suitability of all sites for inclusion in the Draft</p>

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	<p>most sustainable location for further growth in the Borough should still be supported, however, other areas that can support growth in the Borough are not specifically acknowledged.</p> <p>2.2 Paragraph 2.6 states 'having a clear vision is important for plan making as it provides the basis for prioritising competing issues and understanding impact'. Although evidence has been produced to recognise the Borough's challenges these cannot yet be translated into an updated Vision for Charnwood until the most appropriate locational strategy to deliver sustainable development has been identified.</p> <p>2.3 Other settlements in Charnwood have been identified as being able to provide sustainable development in the Borough in the Settlement Hierarchy Assessment (2018). These opportunities for development are not fully acknowledged in the Core Strategy Vision for Charnwood and the Local Plan Review should provide the opportunity for further consideration of reasonable alternatives to be carried out by the Council, and therefore the Vision will need to be updated to reflect the findings of an up to date evidence base.</p> <p>3. AREAS OF SEPARATION AND GREEN WEDGES</p> <p>3.1 It has been a longstanding policy for the Charnwood area to identify structurally important areas of open land between settlements to ensure the identity of towns and villages are protected.</p> <p>3.2 The Green Wedge and Areas of Local Separation Review, dated March 2016, provides evidence of how different areas perform against the purposes of the respective designations set out in local policy. There are no designations for Areas of Separation or Green Wedges which would affect development at Wymeswold</p> <p>4. SETTLEMENT HIERARCHY AND SETTLEMENT LIMITS TO DEVELOPMENT</p> <p>4.1 The Settlement Hierarchy contained within the Discussion Paper has been informed by a Settlement Hierarchy Assessment (2018). The assessment informs the Council's Local Plan for the Borough up to 2036 as to where new development should be located to achieve sustainable patterns of movement and how local services and facilities can be supported.</p> <p>4.2 Wymeswold has been identified as an 'Other Settlement' in the Settlement Hierarchy Assessment (2018). This is defined as a settlement that has some of the services and facilities to meet the day to day needs of the community. We do not consider that the assessment in respect of Wymeswold provides an accurate reflection of the available services and facilities and the sustainability of the settlement.</p> <p>4.3 An appeal decision for Land North of Rempstone Road, Wymeswold (Ref: APP/X2410/A/13/2194622) states that whilst Wymeswold may perform poorly in the context of accessibility to services, when compared to many settlements, including some more urban ones, it</p>	<p>Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p>

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	<p>performs well in terms of access to jobs; Wymeswold Industrial Park and The Defence and National Rehabilitation Centre are both in close proximity to the settlement, and there is a bus route to Melton Mowbray. This resulted in the Inspector taking the view that on balance development at Wymeswold is at least neutral in the context of sustainable development within the overall meaning of Paragraph 7 of the NPPF.</p> <p>4.4 Wymeswold is a very sustainable settlement when considered against the 'Other Settlements' identified in the Settlement Hierarchy Assessment. In line with the Inspector's decision, the Council's assessment does not take into account the same considerations in the planning balance to gauge the level or potential level of sustainable development which may be achievable in settlements in line with Paragraph 7 of the NPPF.</p> <p>4.5 In terms of future growth opportunities, some Service Centres such as Barrow upon Soar and Mountsorrel have physical constraints to development that will restrict the scope to accommodate significant levels of further growth. This a further reason why the most appropriate strategy will include the provision for additional limited growth in the more sustainable 'other settlements' such as Wymeswold.</p> <p>4.6 The Council should give full consideration to assessing sustainable locations for development for the period up to 2036 in Charnwood; as such we suggest that another tier in the hierarchy should be created to allow for limited growth in those 'Other Settlements' that have an opportunity to enhance existing social and economic aspects through sustainable development and would therefore meet the future needs of the settlement. Melton Borough Council in their Local Plan have set out a settlement hierarchy including 'Rural Hubs' as the more sustainable rural settlements below Service Centres. A similar approach should be considered for Charnwood. With the range of services and facilities available and access to local employment, Wymeswold would qualify as a Rural Hub.</p> <p>5. HOUSING STRATEGY OPTIONS</p> <p>5.1 In terms of housing need and supply, the discussion paper states that a minimum of 8,100 homes are needed to flexibly meet the needs in the Borough to 2036 over the commitment outlined in the adopted Core Strategy. Paragraph 4.5 of the Discussion Paper indicates a greater supply of land, for up to 15,700 homes, would maximise the potential for maintaining housing supply. We support this approach as this would provide necessary flexibility to take account of changing circumstances.</p> <p>5.2 Option 6 of the Strategy Options allows for development to be directed to Urban Centres, Urban Settlements and Service Centres and New Settlements. This would ensure maximum capacity at locations which are most accessible to jobs, services, facilities and public transport, whilst development at new settlements would be supported by new infrastructure without putting strain on existing infrastructure in the Borough.</p>	

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	<p>5.3 Wymeswold does not fall into the settlement hierarchy as a Service Centre. As suggested in Paragraph 3.7 above, another tier should be introduced into hierarchy which acknowledges Wymeswold as a sustainable growth area for housing development to ensure the future provision of facilities and services for its community.</p> <p>5.4 We would therefore support a variation of Option 6 to include a new tier to include Wymeswold as the Housing Strategy for Charnwood to take forward in the Local Plan Review.</p> <p>5.5 A planning application seeking outline consent for 45 dwellings at East Road, Wymeswold has been submitted to Charnwood Borough Council by Davidsons Developments Limited. This application is currently pending consideration (reference P/18/0081/2).</p>	
<p>TLP/103 Peter Bretts on behalf of Barwood Dev Securities Ltd (Shepshed)</p>	<p>On behalf of our client Barwood Development Securities Limited, we wish to make the following representations in respect of the above consultation document. Our client has an interest in land (owned by the Garendon Estate) at Paradise Farm, Shepshed, some 10.85 hectares in area and shown outlined in red on the attached plan. We consider this land to be eminently suitable, achievable and deliverable for sustainable residential development of approximately 250 dwellings.</p> <p>Proposed Settlement Hierarchy (Table 1, page 10, Discussion Paper) We agree with the inclusion of Shepshed as one of four Urban Settlements, with only Loughborough (an 'Urban Centre') above them in the hierarchy.</p> <p>Housing Strategy Options (Paragraphs 4.4 – 4.9, Discussion Paper) We support the position in paragraphs 4.5 – 4.7 of the Paper where a higher growth scenario, providing for an additional 15,700 homes up to 2036 (over and above existing commitments), is proposed. We do not support the alternative, minimum provision of an additional 8,100 homes described in paragraph 4.4. The higher growth scenario would provide the right balance to meet needs and ensure flexibility and control, thereby avoiding the Plan becoming out of date whilst also protecting Charnwood's environment. We also note that the Government's new standard methodology for calculating housing need, when adopted, is likely to result in increased housing need for Charnwood and for the city of Leicester. Future consultation on growth options in the emerging Local Plan will need to provide for such increased needs.</p> <p>Broad Locations for Housing Development (Paragraphs 4.10 – 4.50, Discussion Paper) We comment as follows on the seven options described:</p> <p>Option 1: Leicester and Loughborough Urban Areas Shepshed is an Urban Settlement within the proposed settlement hierarchy and is also part of the Loughborough Urban Area, as defined in the Paper. However, we do not support this option in isolation, as relying on these areas alone will not be sufficient to accommodate the higher growth scenario described above.</p> <p>Option 2: Leicester and Loughborough Urban Areas and Service Centres. We support this option as it</p>	<p>We note your comments in relation to land at Paradise Farm, Shepshed on the settlement hierarchy and housing strategy options. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>We also note the additional information provided.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p>

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	<p>would provide for sustainable development at Shepshed, including our client’s site, as well as accommodating the higher growth scenario.</p> <p>Option 3: Settlement Hierarchy Distribution As with option 2, this option would provide for sustainable development at Shepshed, but in smaller settlements (the ‘Other Settlements’ within the proposed hierarchy) it may result in development without the critical mass needed in order to improve infrastructure.</p> <p>Option 4: Proportionate Distribution As with option 2, this option would provide for sustainable development at Shepshed, but allowing for development in ‘Small Villages and Hamlets’ is unlikely to be the most sustainable development option.</p> <p>Option 5: Leicester and Loughborough Urban Areas and New Settlements As with option 2, this option would provide for sustainable development at Shepshed, but reliance on new settlements adds considerable uncertainty about delivery and delay as no location for a new settlement has been identified to date and new settlements do not benefit from existing infrastructure. This option would also fail to accommodate the higher growth scenario and we do not support it therefore.</p> <p>Option 6: Leicester and Loughborough Urban Areas and Service Centres and New Settlements As with option 2, this option would provide for sustainable development at Shepshed, but reliance on new settlements adds considerable uncertainty about delivery and delay as no location for a new settlement has been identified to date and new settlements do not benefit from existing infrastructure. This option would also fail to accommodate the higher growth scenario and we do not support it therefore.</p> <p>Option 7: New Settlements Reliance on new settlements adds considerable uncertainty about delivery and delay as no location for a new settlement has been identified to date and new settlements do not benefit from existing infrastructure. This option would also fail to accommodate the higher growth scenario and we do not support it therefore.</p> <p>SHLAA 2018 We attach an updated 2018 SHLAA form relating to the site, to reflect the latest site conditions and circumstances. The Paradise Farm land is sustainably located and well related to the existing form and character of Shepshed, as follows:</p> <ul style="list-style-type: none"> • it has good accessibility in terms of the highway network (Tickow Lane, the A512 and the M1 at junction 23); • it is well connected by bus, with the Arriva 126 service serving the site frontage and additional services to be provided as part of the approved development immediately north of the site; • for pedestrians, it has direct access to the Jubilee Way foot/cyclepath which runs along the northern site boundary and connects with adjoining residential areas and beyond towards the town centre; • it is within a mile of the significant employment, retail and other services provided in and adjoining Shepshed town centre; • residential development is currently underway on the land immediately north of the site, therefore the 	

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	<p>principle of developing in this locality has previously been accepted; and</p> <ul style="list-style-type: none"> • there are also strong defensible boundaries to the west (Tickow Lane), south (the A512) and east (White Horse Wood). <p>The SHLAA form also confirms there are no overriding technical, environmental or ownership constraints which would preclude residential development of the site and that such development is suitable, achievable and deliverable within the next 5 years, thereby helping to meet Charnwood's short term housing needs and sustainable growth aspirations.</p> <p>Settlement Limit For all the reasons set out above, our client's site at Paradise Farm, Shepshed should be included within any defined settlement limit of Shepshed. We trust these representations are helpful at this stage and we look forward to further involvement in the consultation process over the next few months.</p>	
<p>TLP/104 Pegasus on behalf of Hallam Land Management Ltd</p>	<p>1. INTRODUCTION 1.1 These submissions have been prepared on behalf of Hallam Land Management Limited who have interests in land off Seagrave Road, Sileby. We have previously made submissions to the Council on the opportunity for sustainable growth in this location, including identifying the site in the Strategic Housing Land Availability Assessment (SHLAA)(ref PSH076).</p> <p>2. VISION FOR CHARNWOOD IN 2036 2.1 The Discussion Paper refers to the adopted Core Strategy which sets out the vision for Charnwood up to 2028. The Paper invites views on whether the current development strategy should be extended or whether something different should happen.</p> <p>2.2 The Charnwood Core Strategy Vision sets out an urban focused approach with development directed towards Loughborough and the edge of Leicester City, with a more limited amount of development directed to the more sustainable Service Centres, including Sileby.</p> <p>2.3 In the context of future growth in Charnwood, it is considered that there remain opportunities for sustainable growth in Service Centres such as Sileby which offer a wide range of local services and facilities and good public transport connectivity to Loughborough and Leicester. Indeed, Sileby is one of the more sustainable locations for growth outside the identified urban centres, providing a range of local services and facilities and public transport access to major centres by both bus and train. It is therefore considered that the overall vision set out in the Core Strategy, reflecting an urban focused approach to development recognising the important role to be played by the more sustainable Service Centre villages, is a generally appropriate vision to take forward over the period to 2036.</p> <p>2.4 We comment below on the settlement hierarchy and the identified reasonable development strategy options.</p>	<p>We note your comments in relation to land at Seagrave Road, Sileby on Vision for Charnwood, Areas of Local Separation and Green Wedges, the Settlement Hierarchy and Settlement Limits and the Housing Strategy Options. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p>

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	<p>3. AREAS OF SEPARATIONS AND GREEN WEDGES</p> <p>3.1 The Discussion Paper refers to the Green Wedge and Local Separation Review, 2016 which has informed proposals to amend existing Areas of Green Wedge and Local Separation.</p> <p>3.2 The land off Seagrave Road, Sileby is not identified as an area proposed for safeguarding as either Green Wedge or an Area of Local Separation.</p> <p>4. SETTLEMENT HIERARCHY AND SETTLEMENT LIMITS TO DEVELOPMENT</p> <p>4.1 The Settlement Hierarchy contained within the Discussion Paper has been informed by a Settlement Hierarchy Assessment (2018). The assessment informs the proposed Settlement Hierarchy as set out in Table 1 to the Discussion Paper.</p> <p>4.2 The proposed settlement hierarchy largely reflects the hierarchy as set out in the adopted Core Strategy, other than the upgrading of Syston to an 'urban settlement', which, along with Birstall and Thurmaston, physically or functionally forms part of a wider Leicester Urban Area.</p> <p>4.3 Sileby is identified as a Service Centre reflecting the range of services and facilities available in the village and to good public transport connectivity to both Loughborough and Leicester.</p> <p>4.4 The Settlement Hierarchy Assessment recognises that Sileby has a full range of services and facilities and good transport connections to Leicester with a 30 minute bus service with a travel time to the city of some 30 minutes. The summary assessment in the report should also recognise the availability of train services connecting Sileby with Loughborough and Leicester with a 15 minute journey time to Leicester and 11 minutes to Loughborough. The Settlement Hierarchy Assessment should acknowledge that those Service Centres with both rail and bus access provide more sustainable opportunities in terms of the location of new development.</p> <p>4.5 It is important that the new Local Plan properly recognises the sustainability credentials of the Service Centres and the opportunities for some further growth to help meet the overall housing requirement. Land off Seagrave Road, Sileby provides an opportunity for further growth to help meet future housing requirements.</p> <p>5. HOUSING STRATEGY OPTIONS Housing Strategy Options – Growth Scenarios</p> <p>5.1 In terms of housing need and supply, the Discussion Paper states that a minimum of 8,100 homes are needed to flexibly meet the needs in the Borough to 2036 over the commitments outlined in the adopted Core Strategy. This reflects evidence as set out in the Housing and Economic Development Needs Assessment. Paragraph 4.5 of the Discussion Paper indicates a greater supply of land, for up to 15,700 homes, would maximise the potential for maintaining housing supply by providing flexibility to take account of changing circumstances. We support this approach as this would provide necessary</p>	

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	<p>flexibility to take account of changing circumstances. The approach reflects advice from the Local Plans Expert Group which encourages authorities to build flexibility into their plans.</p> <p>5.2 A critical issue that the Discussion Paper fails to address is the extent to which the Council will need to make provision for Leicester's unmet needs. It is understood that a Memorandum of Understanding is being prepared that will establish the extent of the unmet need and the distribution between adjoining local authorities. Evidence available to the Oadby and Wigston Examination indicates that the shortfall could be at least 9,800 dwellings to 2031. This level of unmet need is substantial and so far, the Councils have failed in the Duty to Cooperate to clearly agree a strategy for meeting the level of growth required to 2031 and 2036.</p> <p>5.3 The Councils now need to work with some urgency to reach an agreement on the strategy for accommodating Leicester's unmet needs so that this requirement can be properly factored in to the next stages in the preparation of the new Charnwood Local Plan.</p> <p>Broad Locations for Development</p> <p>5.4 The Discussion Paper outlines seven broad options for growth ranging from a focus on Leicester and Loughborough to a wider dispersed strategy with growth distributed across the settlement hierarchy. The option for a single standalone new settlement is also considered.</p> <p>5.5 The current spatial strategy as set out in the Core Strategy is one of urban concentration and regeneration. This has generally been successful in directing development to the sustainable locations adjoining Leicester and Loughborough and the more sustainable larger Service Centres.</p> <p>5.6 Given the scale of growth Charnwood will need to accommodate over the plan period to 2036 even without any provision for Leicester's unmet needs, the locational strategy will need to take full advantage of opportunities available for sustainable growth. It is considered that the most deliverable option is likely to include a mix of development focused on the existing urban areas of Leicester and Loughborough, development in smaller new settlements and growth directed to the Service Centres and also the more sustainable rural settlements. Option 6 sets out an approach focusing on Loughborough and Leicester, new settlements and Service Centres. In our view the option should also consider options for growth in the more sustainable 'other settlements'. This 'hybrid' of Option 6 is considered to represent the most sustainable strategy for the Borough.</p> <p>5.7 Development at Seagrave Road, Sileby would logically form part of this strategy and represent a sustainable growth opportunity to deliver some 195 dwellings. An outline application for development on the site is the subject of an ongoing appeal following a successful legal challenge. The original Inspector's decision recognises that the site is sustainably located and that there would be limited to minimal landscape and visual impact arising from the proposals. Reconvened inquiry sessions in early June will consider issues relating to the potential impacts of noise and odour from the nearby poultry</p>	

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	<p>farm. The detailed assessments presented on behalf of Hallam Land Management demonstrate that these matters do not represent an overriding constraint to development in this location.</p> <p>5.8 The proposals for development at Seagrave Road, Sileby should be included as a proposed allocation in the next stages of the Local Plan to help meet identified housing needs over the plan period.</p>	
<p>TLP/105 Pegasus on behalf of Taylor Wimpey</p>	<p>1. INTRODUCTION</p> <p>1.1 These submissions have been prepared on behalf of Taylor Wimpey Strategic Land (Eastern) who have interests in land to the north of Barkby Road, Syston. Submissions have previously been made to the Council on the opportunity for sustainable growth in this location.</p> <p>2. VISION FOR CHARNWOOD IN 2036</p> <p>2.1 The Discussion Paper refers to the adopted Core Strategy which sets out the vision for Charnwood up to 2028. The Paper invites views on whether the current development strategy should be extended or whether something different should happen.</p> <p>2.2 The Charnwood Core Strategy Vision sets out an urban focused approach with development directed towards Loughborough and the edge of Leicester City, with a more limited amount of development directed to the more sustainable Service Centres, including Syston.</p> <p>2.3 In the context of future growth in Charnwood, it is considered that there remain opportunities for sustainable growth in Service Centres that offer a wide range of local services and facilities and good public transport connectivity to Loughborough and Leicester. It is noted that the Discussion Paper proposes the promotion of Syston up the settlement hierarchy to an urban settlement as part of the wider Leicester urban area. This amendment to the settlement hierarchy is fully supported. It is therefore considered that the overall vision set out in the Core Strategy, reflecting an urban focused approach to development recognising the important role to be played by the sustainable settlements adjoining Leicester, including Syston, is a generally appropriate vision to take forward over the period to 2036.</p> <p>2.4 We comment below on the settlement hierarchy and the identified reasonable development strategy options.</p> <p>3. AREAS OF SEPARATION AND GREEN WEDGES</p> <p>3.1 The Discussion Paper refers to the Green Wedge and Local Separation Review, 2016 which has informed proposals to amend existing Areas of Green Wedge and Local Separation.</p> <p>3.2 For the land to north of Barkby Road, Syston, the Areas of Separation and Green Wedge Study does not identify the land as either performing the function of a Green Wedge or Area of Local Separation. This is supported as the land adjoins existing development to the north and south and does</p>	<p>We note your comments in relation to land north of Barkby Road, Syston on Vision for Charnwood, Areas of Local Separation and Green Wedges, the Settlement Hierarchy and Settlement Limits and the Housing Strategy Options. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>We also note the additional information provided.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p>

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	<p>not play a strategic function as a structurally important area of open land and does not play an important role in separating settlements. In separate representations Taylor Wimpey comment on the Study's proposals for land to the South of Barkby Road.</p> <p>4. SETTLEMENT HIERARCHY AND SETTLEMENT LIMITS TO DEVELOPMENT</p> <p>4.1 The Settlement Hierarchy contained within the Discussion Paper has been informed by a Settlement Hierarchy Assessment (2018). The assessment informs the proposed Settlement Hierarchy as set out in Table 1 to the Discussion Paper.</p> <p>4.2 The proposed settlement hierarchy largely reflects the hierarchy as set out in the adopted Core Strategy, other than the upgrading of Syston to an 'urban settlement', which, along with Birstall and Thurmaston, physically or functionally forms part of a wider Leicester Urban Area.</p> <p>4.3 This amendment to the settlement hierarchy is fully supported and reflects Syston's strong relationship with the Leicester urban area and the wide range of services and facilities available in the settlement.</p> <p>4.4 The Settlement Hierarchy recognises that Syston has a full range of services and facilities including a secondary school, a range of employment opportunities and a choice of services within the settlement. The Assessment notes that Syston has a strong relationship with Leicester City, with 34% of the economically active residents in Syston working in Leicester. The very good transport connections are also referred to. The summary refers to the 20 minute frequency bus service available. It is also important to recognise that Syston has a railway station with a park and ride facility, providing quick connections by rail to both Leicester and Loughborough. The Settlement Hierarchy Assessment conclusions for Syston should be amended to refer to the availability of both bus and rail connections, making the settlement one of the more sustainable locations for further growth on the edge of the Leicester urban area.</p> <p>4.5 Land to the north of Barkby Road provides an opportunity to provide further development in a highly sustainable location to help meet future housing requirements.</p> <p>5. HOUSING STRATEGY OPTIONS</p> <p>Housing Strategy Options – Growth Scenarios</p> <p>5.1 In terms of housing need and supply, the Discussion Paper states that a minimum of 8,100 homes are needed to flexibly meet the needs in the Borough to 2036 over the commitments outlined in the adopted Core Strategy. This reflects evidence as set out in the Housing and Economic Development Needs Assessment. Paragraph 4.5 of the Discussion Paper indicates a greater supply of land, for up to 15,700 homes, would maximise the potential for maintaining housing supply by providing flexibility to take account of changing circumstances. We support this approach as this would provide necessary flexibility to take account of changing circumstances. The approach reflects advice from the Local Plans</p>	

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	<p>Expert Group which encourages authorities to build flexibility into their plans.</p> <p>5.2 A critical issue that the Discussion Paper fails to address is the extent to which the Council will need to make provision for Leicester's unmet needs. It is understood that a Memorandum of Understanding is being prepared that will establish the extent of the unmet need and the distribution between adjoining local authorities. Evidence available to the Oadby and Wigston Examination indicates that the shortfall could be at least 9,800 dwellings to 2031. This level of unmet need is substantial and so far, the Councils have failed in the Duty to Cooperate to clearly agree a strategy for meeting the level of growth required to 2031 and 2036.</p> <p>5.3 Charnwood is well placed to help meet the City's unmet needs. Given Syston's strong relationship with the City, development to the north of Barkby Road represents a highly sustainable opportunity to help accommodate future growth requirements including any identified unmet needs from Leicester.</p> <p>5.4 The Councils now need to work with some urgency to reach an agreement on the strategy for accommodating Leicester's unmet needs so that this requirement can be properly factored in to the next stages in the preparation of the new Charnwood Local Plan.</p> <p>Broad Locations for Development</p> <p>5.5 The Discussion Paper outlines seven broad options for growth ranging from a focus on Leicester and Loughborough to a wider dispersed strategy with growth distributed across the settlement hierarchy. The option for a single standalone new settlement is also considered.</p> <p>5.6 The current spatial strategy as set out in the Core Strategy is one of urban concentration and regeneration. This has generally been successful in directing development to the sustainable locations adjoining Leicester and Loughborough and the more sustainable larger Service Centres.</p> <p>5.7 Given the scale of growth Charnwood will need to accommodate over the plan period to 2036 even without any provision for Leicester's unmet needs, the locational strategy will need to take full advantage of opportunities available for sustainable growth. It is considered that the most deliverable option is likely to include a mix of development focused on the existing urban areas of Leicester (including Syston) and Loughborough, development in smaller new settlements and growth directed to the Service Centres and also the more sustainable rural settlements. Option 6 sets out an approach focusing on Loughborough and Leicester, new settlements and Service Centres and this is generally supported.</p> <p>5.8 Development to the north of Barkby Road, Syston would logically form part of this strategy and represent a sustainable growth opportunity to deliver some 195 dwellings. As part of these submissions we have included an indicative masterplan showing how the site could be developed.</p>	

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	<p>5.9 An outline application for the proposed development is about to be submitted. The application will be supported by a suite of supporting technical reports that demonstrate that there are no overriding constraints to development in this location. As part of the pre-application work, a public exhibition was held giving the opportunity to view and comment on the proposals. Taylor Wimpey has also engaged with both the Borough Council and Syston Town Council, keeping them informed of the emerging proposals for the site.</p> <p>5.10 The proposals for development to the north of Syston should be included as a proposed allocation in the next stages of the Local Plan to help meet identified housing needs over the plan period.</p> <p>Further documents/information submitted with representation ref : TLP/105</p>	
<p>TLP/106 Pegasus on behalf of David Wilson Homes</p>	<p>1. INTRODUCTION</p> <p>1.1 These submissions are prepared on behalf of David Wilson Homes who have interests in land west of Barkby Road, Queniborough. Previous submissions have been made in relation to the site at earlier stages of the plan preparation process, including a submission on the Strategic Housing Land Availability Assessment (SHLAA – ref PSH221).</p> <p>2. VISION FOR CHARNWOOD IN 2036</p> <p>2.1 The Core Strategy Vision for Charnwood 2011-2028 outlines that the demand for housing will be focussed on Loughborough and the edge of Leicester. The urban focused strategy directing development to locations well related to the main urban centre of Leicester remains an appropriate strategy for the new Local Plan.</p> <p>2.2 Other settlements in Charnwood have been identified as being able to provide sustainable development in the Borough in the Settlement Hierarchy Assessment (2018). These opportunities for development are not fully acknowledged in the Core Strategy Vision for Charnwood and the Local Plan Review should provide the opportunity for further consideration of reasonable alternatives to be carried out by the Council, and therefore the Vision will need to be updated to reflect the findings of an up to date evidence base.</p> <p>3. AREAS OF SEPARATION AND GREEN WEDGES</p> <p>3.1 It has been a longstanding policy for the Charnwood area to identify structurally important areas of open land between settlements to ensure the identity of towns and villages are protected.</p> <p>3.2 The Green Wedge and Areas of Local Separation Review, dated March 2016, provides evidence of how different areas perform against the purposes of the respective designations set out in local policy.</p> <p>3.3 The Review identifies the land to the west of Barkby Road, Queniborough as part of a wider Area of Local Separation (ALS-J) between Queniborough and Syston. The assessment does not provide a sufficiently fine grained assessment of land making up this proposed Area of Local Separation. With the</p>	<p>We note your comments in relation to land north of Barkby Road, Queniborough on Vision for Charnwood, Areas of Local Separation and Green Wedges, the Settlement Hierarchy and Settlement Limits and the Housing Strategy Options. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>We also note the additional information provided.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p>

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	<p>Davidsons Homes development to the east, land to the west of Barkby Road is now edged by development on two sides and relates closely to the existing built form of the settlement. Development on the land would not threaten the separate identities of Queniborough and Syston. As part of the recent planning application for the site, a supporting Landscape Assessment was submitted demonstrating how development in this location could be accommodated without unacceptable landscape impacts and without threatening the separate identities of the settlements. The assessment should be revisited on the basis of this evidence and the land to the west of Barkby Road removed from the designation.</p> <p>4. SETTLEMENT HIERARCHY AND SETTLEMENT LIMITS TO DEVELOPMENT</p> <p>4.1 The Settlement Hierarchy contained within the Discussion Paper has been informed by a Settlement Hierarchy Assessment (2018). The assessment informs the Council's Local Plan for the Borough up to 2036 as to where new development should be located to achieve sustainable patterns of movement and how local services and facilities can be supported.</p> <p>4.2 Queniborough has been identified as an 'Other Settlement' in the Settlement Hierarchy Assessment (2018). This is defined as a settlement that has some of the services and facilities to meet the day to day needs of the community. We do not consider that the assessment in respect of Queniborough provides an accurate reflection of the available services and facilities and the sustainability of the settlement.</p> <p>4.3 The settlement has a good range of services and facilities and is close to Syston with the wider range of services and facilities it offers, including secondary education in the nearby Wreake Valley College and leisure facilities at Wreak Valley Leisure Centre.</p> <p>4.4 The settlement is in a location well related to the Leicester urban area to the south and offers the opportunity to provide for growth to help meet identified unmet needs from the City.</p> <p>4.5 The Council should give full consideration to assessing sustainable locations for development for the period up to 2036 in Charnwood; as such we suggest that another tier in the hierarchy should be created to allow for limited growth in those 'Other Settlements' that have an opportunity to enhance existing social and economic aspects through sustainable development and would therefore meet the future needs of the settlement. Melton Borough Council in their Local Plan have set out a settlement hierarchy including 'Rural Hubs' as the more sustainable rural settlements below Service Centres. A similar approach should be considered for Charnwood. With the range of services and facilities available and access to local employment, Queniborough would qualify as a Rural Hub.</p> <p>5. HOUSING STRATEGY OPTIONS</p> <p>5.1 In terms of housing need and supply, the discussion paper states that a minimum of 8,100 homes are needed to flexibly meet the needs in the Borough to 2036 over the commitment outlined in the</p>	

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	<p>adopted Core Strategy. Paragraph 4.5 of the Discussion Paper indicates a greater supply of land, for up to 15,700 homes, would maximise the potential for maintaining housing supply. We support this approach as this would provide necessary flexibility to take account of changing circumstances.</p> <p>5.2 Option 6 of the Strategy Options allows for development to be directed to Urban Centres, Urban Settlements and Service Centres and New Settlements. This would ensure maximum capacity at locations which are most accessible to jobs, services, facilities and public transport, whilst development at new settlements would be supported by new infrastructure without putting strain on existing infrastructure in the Borough.</p> <p>5.3 Queniborough does not fall into the settlement hierarchy as a Service Centre. As suggested in Paragraph 3.7 above, another tier should be introduced into hierarchy which acknowledges Queniborough as a sustainable growth area for housing development to ensure the future provision of facilities and services for its community and to help meet future housing needs including unmet needs from Leicester.</p> <p>5.4 We would therefore support a variation of Option 6 to include a new tier to include Queniborough as a Rural Hub and a sustainable location for growth as part of the Local Plan review.</p> <p>5.5 A planning application for the development of some 150 homes on the site has recently been refused by the Council and will be the subject of a planning appeal. The application masterplan has been included as part of these submissions to demonstrate how the site could be sustainably developed.</p> <p>5.6 In the next stages of the Plan preparation, Queniborough should be identified as a sustainable Rural Hub well related to the Leicester urban area and the land west of Barkby Road should be allocated to provide some 150 homes to help meet future housing needs.</p> <p>Further documents/information submitted with representation ref: TLP/106</p>	
<p>TLP/107 Wanlip Parish Meeting</p>	<p>This letter is sent on behalf of Wanlip Parish Meeting which welcomes the opportunity to input to the development of 'Towards a plan for Charnwood (2036)'. It outlines why Wanlip Parish should be protected from any further housing development adjacent to the Wanlip Village Envelope or in the Area of Separation with Birstall (PSH 79, 80 and 72).</p> <p>Individual residents have already submitted, thoughtful and compelling statements outlining why the potential sites for development around Wanlip Village should be turned down. This document does not summarise them; it is an overview of the potential impact on the village and the community and the contribution that Wanlip has made to the Charnwood and Leicestershire communities.</p> <p>Wanlip a picturesque Charnwood village</p>	<p>The Towards a Local Plan consultation has been informed by the Strategic Housing Land Availability Assessment which included sites which developers would like to promote for residential development. No decisions have been made at this stage about any of these sites and their suitability for allocation in the Draft Local Plan</p>

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CONSULTEE**

RESPONSES

OFFICER COMMENTS

Wanlip is an ancient settlement, a rural enclave, mentioned in the Domesday Book.

It consists of around 70 houses (160 residents) sited along two roads which do not have complete pavements. It is classified as a ‘small village and hamlet’ (Charnwood Settlement Hierarchy Assessment March 2018) with ‘poor accessibility to employment and higher order services but access to a secondary school, high speed broadband and a range of recreation, leisure and community facilities.’ Note: - the recreation facilities are a church and hall.

Wanlip has both a designated Village Envelope and Area of Land Separation which is ‘recommended for designation in the new local plan’, (Towards a plan for Charnwood 2036) which we support.

Sites PSH 79 and 80 lie adjacent to the Village Envelope and PSH 72 lies outside the Village Envelope but within the Area of Separation. The field boundaries of area PSH80 borders land that should it be developed upon, could trigger dwellings to Birstall i.e. total in-fill of the Area of Separation.

Any breach of these areas will set a precedent for further inappropriate development and would be contrary to Charnwood’s intent to ‘Maintain settlement identity and prevent coalescence.’ (Charnwood Local Plan Sustainability Appraisal: Housing and employment strategy).

Each of the sites are examples of ‘Good quality agricultural land (that) is at risk from development.’ (Charnwood Local Plan Sustainability Appraisal: Housing and employment strategy).

The potential impact on the village from the sites PSH 79, 80 and 72 in ‘Land of Potential Development’ has been estimated in the table below. Should everything take place the number of houses in the village would increase nearly four-fold, the population increase quadruple and likewise the number of cars.

Village	Impact of: -	Cumulative Total Houses	~ Cumulative estimated population (actual and est)	Est. Total Cars*
Today	-	71	160 (actual)	132
PSH 79 – within the envelope	100 houses and 370* people	171	530	317
PSH 80 – within the envelope	60 houses and 222* people	231	687	428
PSH 72– within the area of separation	19 houses and 71* people	250	748	463

*Based on based on a survey by the Chair of the Parish meeting, which shows ~85% of houses with 2+ people and 2 cars and 15% with 2 people and 1 car.

as residential sites.

We note your concerns about any future development at Wanlip. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation and be accompanied by an appropriate range of evidence, and supporting documents.

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	<p>Traffic flow through the village is already very heavy, particularly at the beginning and end of the working day. The reason for this is partly covered in the statement in Towards a Plan for Charnwood 'There is also congestion on the A6 at ... Birstall, and at the Hobby Horse Roundabout in Syston', with the village being used as a rat-run for those trying to avoid these areas.</p> <p>Preservation of the village needs traffic to be reduced not increased. Any potential increase in houses, population and traffic would undoubtedly change the village appearance, character and infrastructure forever. It is hard to reconcile this potential outcome with the Charnwood vision of 'Our picturesque villages will have retained their strong sense of identity' (Towards a Plan for Charnwood (2036) and Charnwood Local Plan Sustainability Appraisal: Housing and employment strategy).</p> <p>Wanlip Village cares about housing needs Please note that the village residents recognised the pressure on the local authority to meet a housing quota when PSE 110 North of Birstall Direction of Growth* was first presented as 'Broadnook' and concluded, after consultation within the village, that it was inappropriate to oppose it.</p> <p>PSE 110 currently has an associated planning application for ~1650 houses. When this was first proposed, Wanlip Parish did not oppose the application, as the villagers conceded that new homes are required. Indeed, residents were involved in numerous meetings with the land agent, local authority and County Council Transport Department to discuss how the development could be progressed.</p> <p>We did however, present a well-founded opposition to a proposed, so-called Wanlip by-pass, which would have in practice, brought additional traffic towards the village and onwards into a densely populated area of Birstall. We also opposed the development of land for commercial use on the side of the A6 adjacent to the village.</p> <p>Our opposition remains towards a 'by-pass' and commercial development close to the village. We continue to support housing on the land north-west of the A6/A46 Interchange.</p> <p>*Note: although described as 'Birstall', the designated area actually lies within the Parish of Wanlip.</p> <p>Wanlip Village cares about its environment Our size is our strength. It means that we have a strong sense of ownership for the village and its environment. This would undoubtedly change should the size and population of the village change as estimated.</p> <p>We manage our neighbourhood through a Parish Meeting which meets twice a year (Note: -we would no longer qualify to be a Parish Meeting should the village grow as predicted in the table). The quality of our governance was endorsed by the 2017 Local Governance Review when a proposal for Wanlip to</p>	

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	<p>merge with Birstall PC was rejected.</p> <p>Communication amongst residents is enabled through, mail shots, an email distribution list and a village produced and maintained website.</p> <p>The upkeep of the village is funded through the precept which is £2,000 and a twice yearly fair held in partnership with the church which raises around £1,500.</p> <p>In the last 5 years our community spirit has meant that we have:-</p> <ol style="list-style-type: none"> 1. Restored a finger post dating back, in part, to 1864, 2. Purchased signage for the Church and Community Hall, 3. Purchased an English oak, hand-carved noticed board for the village centre and landscaped the surrounding area, 4. In conjunction with St James and St Nicholas church, the village hall kitchen has been refitted and the toilet facilities upgraded. We are currently raising funds to replace the floor in the main room of the hall., 5. Placed planters at the entrances to the village which are replenished at least twice a year, and 6. Planted around 1000 spring bulbs <p>Wanlip Village cares about Nature Conservation and historic monuments We seek to protect the wildlife and monuments in our area. As pointed out when PSH 80 was proposed several years ago the site lies within 20m of The Wildlife Trust Wanlip Meadows and development so close, would impact on the ecology of the meadow and the village.</p> <p>Out of concern for the effect dog-fouling on Wanlip Meadows and the Spinney off Rectory Road we successfully worked with a local councillor to procure and site dog waste bins at the entrances to these sites.</p> <p>PSH 79 is close to an Ice House which has been neglected for many years. Wanlip Parish Meeting has sought help/guidance from Charnwood Borough Council. In the absence of this we are seeking to secure funds through a national scheme to restore ice houses and if successful will seek to work with all interested parties to secure this historic monument. This is consistent with the aim re to 'Conserve and enhance the historic environment, heritage assets and their settings.'</p> <p>Wanlip Parish's contribution to the needs of Charnwood and Leicester City Wanlip Parish has made and continues to make a significant contribution to the needs of Charnwood and Leicester. In recent years, land from Wanlip Parish has already been used for building:</p> <ol style="list-style-type: none"> 1. Severn Trent Sewage works serving all of Leicester City and beyond, 2. Longslade & Stonehill School (Cedars Academy), 	

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	<p>3. The A46 Western By-pass, 4. The Hallam Fields housing development which has delivered over 900 houses, and 5. The Birstall Park & Ride.</p> <p>Together, these effectively reduced the land area of the parish by half.</p> <p>Development North of Birstall will potentially provide a further 1650 houses of the Charnwood housing target but will eliminate a further quarter of the pre-1960s Parish of Wanlip. And in turn, each of these developments have diminished the amenity of the village.</p> <p>Nevertheless, the village remains small and historic, with a uniquely rural character rare in settlements so close to large urban developments. Is it unreasonable for residents to resist any further development or indeed to share a sense of custodianship of our place to live - in line with the Charnwood Vision of 'Our picturesque villages will have retained their strong sense of identity.'</p> <p>We therefore request that PSH 79, 80 and 72 are withdrawn from the register of sites of potential development.</p>	
TLP/108	<p>I would like to register my opposition to PSH 79, 80 and 72 being considered as sites for potential development.</p> <p>Wanlip is a small hamlet of historic interest. It is unique in being a rural enclave within 15 mins of Leicester City Centre. Siting potentially 179 houses either on the boundary of the village envelope and/or all within the Area of Land Separation would irreparably change and damage the village character for ever. Not to mention the effect of the significant changes to the road infrastructure that would have to take place to accommodate the associated traffic. Any development on these sites would set precedent for future development and could lead to complete infill between Wanlip and Birstall</p> <p>PSH 79 has been proposed several times by the landowner. Each time it has been declined by Highways on the basis for access reasons (via Church Road, which is double parked and generally single track, around a tight/blind right necking down to a single track road). Yet the proposer on the application states 'There are no known irresolvable physical/environmental constraints preventing development' yet nothing has changed to the road system. The site is also within 20 m of Wanlip Meadows which is owned by the Leicestershire and Rutland Wildlife Trust. Introducing 60 houses and at least that number of vehicles into the area would cause damage to the local ecology. Further the land is prone to flooding.</p> <p>We should protect and maintain Leicestershire's hamlet in line with the Charnwood Vision of 'Our picturesque villages will have retained their strong sense of identity.'</p>	<p>The Towards a Local Plan consultation has been informed by the Strategic Housing Land Availability Assessment which included sites which developers would like to promote for residential development. No decisions have been made at this stage about any of these sites and their suitability for allocation in the Draft Local Plan as residential sites.</p> <p>We note your concerns about any future development at Wanlip. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation and be accompanied by an appropriate range of evidence,</p>

RESPONSE NO/ CONSULTEE	RESPONSES	OFFICER COMMENTS
<p>TLP/109 Pegasus on behalf of Jelson Homes</p>	<p>We would like to have PSH 79, 80 and 72 withdrawn from the register of sites of potential development</p> <p>1. INTRODUCTION</p> <p>1.1 These submissions have been prepared on behalf of Jelson Homes Limited who have interest in land located within and near to a number of settlements in the Borough of Charnwood.</p> <p>2. VISION FOR CHARNWOOD IN 2036</p> <p>2.1 The Discussion Paper refers to the adopted Core Strategy which sets out the vision for Charnwood up to 2028. The Paper invites views on whether the current development strategy should be extended or whether something different should happen.</p> <p>2.2 The Charnwood Core Strategy Vision sets out an urban focused approach with development directed towards Loughborough and the edge of Leicester City. The recently published Consultation Draft of the Leicester and Leicestershire Strategic Growth Plan suggests a strategy that directs growth to support key infrastructure provision, including a proposed A46 Expressway around the east and south of Leicester.</p> <p>2.3 In the context of future growth in Charnwood, it is considered that there are opportunities for sustainable growth in the identified Service Centres and also the more sustainable other settlements, where there are opportunities to help meet future housing requirements over the period to 2036 and provide for local housing needs. The overall vision set out in the Core Strategy reflects an urban focused approach to development; it should be acknowledged in an updated Vision for Charnwood, that opportunities exist for smaller scale sustainable development in Other Settlements (as defined in the Council's Settlement Hierarchy (2018)).</p> <p>2.4 We comment in more detail below on the settlement hierarchy and the identified reasonable development strategy options.</p> <p>3. AREAS OF SEPARATION AND GREEN WEDGES</p> <p>3.1 The Discussion Paper refers to the Green Wedge and Local Separation Review, 2016 which has informed proposals to amend existing Areas of Green Wedge and Local Separation.</p> <p>3.2 The Review provides evidence of how different areas perform against the purposes of the respective designations set out in local policy. The Charnwood Borough Core Strategy outlines that the main purpose of Areas of Local Separation is to preserve settlement identity based on landscape character and visual appearance of the area. Green Wedges are designated to guide development form, provide a 'green lung' into urban areas, provide a recreational resource as well as to prevent the merging of settlements.</p> <p>3.3 Development of smaller sites in rural settlements can make a key contribution to the delivery of much needed housing. There is scope to accommodate further growth adjoining Service Centres and</p>	<p>and supporting documents.</p> <p>We note your comments on Vision for Charnwood, Areas of Local Separation and Green Wedges, the Settlement Hierarchy and Settlement Limits and the Housing Strategy Options. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p>

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	<p>Other Settlements without prejudicing the strategic function of proposed areas of Green Wedge and Areas of Local Separation. The function of Green Wedges is as structurally important areas of open land influencing the form and direction of urban development. The definition of these areas should therefore be considered in tandem with assessment of opportunities for the allocation of land to meet future development requirements. Green Wedges are not Green Belt and should not be treated as an outright constraint to development. Similarly, Areas of Local Separation should not preclude suitable development opportunities adjoining settlements that would not threaten the separate identity of settlements. In taking the new Local Plan forward, the Council should consider the opportunities for sustainable growth in arriving at the final definition of areas of Green Wedge and Local Separation.</p> <p>4. SETTLEMENT HIERARCHY AND SETTLEMENT LIMITS TO DEVELOPMENT</p> <p>4.1 The Settlement Hierarchy contained within the Discussion Paper has been informed by a Settlement Hierarchy Assessment (2018). The assessment informs the Council's Local Plan for the Borough up to 2036 as to where new development should be located to achieve sustainable patterns of movement and how local services and facilities can be supported.</p> <p>4.2 The Discussion Paper sets out a five level settlement hierarchy with Loughborough identified as an Urban Centre, Birstall, Shepshed, Syston and Thurmaston as Urban Settlements, then six Service Centre settlements, fourteen Other Settlements and thirteen Small Villages or Hamlets. The Urban Centre of Loughborough, and those settlements listed under Urban Settlements and Service Centres are indicated to be the most sustainable areas for development due to the range, choice and accessibility of services and facilities available for residents.</p> <p>4.3 It is important that the new Local Plan for Charnwood properly recognises the sustainability credentials and development needs of all settlements, including the identified Other Settlements. The localism agenda places a clear emphasis on identifying and responding to locally identified need; needs which may apply in all settlements, not just those at the notional 'upper end' of the settlement hierarchy.</p> <p>4.4 The new Local Plan should recognise that those settlements defined as Other Settlements may have identifiable housing needs and the capacity to meet those needs through smaller scale development.</p> <p>4.5 Indeed, the NPPG is clear in its advice that policies that seek to restrain development in certain settlements on a blanket basis will not be acceptable;</p> <p>"Assessing housing need and allocating sites should be considered at a strategic level and through the Local Plan and/or neighbourhood plan process. However, all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence." (Reference ID: 50-001-20160519)</p>	

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	<p>4.6 An assessment of Settlement Limits to Development has also been carried out by the Council. In most cases of the review of the limits to development in the 'Other Settlements', the boundaries have been reduced to create a tighter perimeter around the built form of the settlement. This restricts the availability of land at these settlements for small scale residential development which therefore inhibits potential sustainable development in rural settlements and their ability to grow, contrary to the NPPG advice. The final definition of settlement limits should respond to assessment of local need and reflect opportunities for the allocation of land for new residential development in the Other Settlements.</p> <p>5. HOUSING STRATEGY OPTIONS Housing Strategy Options – Growth Scenarios</p> <p>5.1 In terms of housing need and supply, the Discussion Paper states that a minimum of 8,100 homes are needed to flexibly meet the needs in the Borough to 2036 over the commitments outlined in the adopted Core Strategy. This reflects evidence as set out in the Housing and Economic Development Needs Assessment. Paragraph 4.5 of the Discussion Paper indicates a greater supply of land, for up to 15,700 homes, would maximise the potential for maintaining housing supply by providing flexibility to take account of changing circumstances. We support this approach as this would provide necessary flexibility to take account of changing circumstances.</p> <p>5.2 A critical issue that the Discussion Paper fails to address is the extent to which the Council will need to make provision for Leicester's unmet needs. It is understood that a Memorandum of Understanding is being prepared that will establish the extent of the unmet need and the distribution between adjoining local authorities. Evidence available to the Oadby and Wigston Examination indicates that the shortfall could be at least 9,800 dwellings to 2031. This level of unmet need is substantial and so far, the Councils have failed in the Duty to Cooperate to clearly agree a strategy for meeting the level of growth required to 2031 and 2036.</p> <p>5.3 Charnwood is well placed to help meet the City's unmet needs. As well as larger urban areas including Loughborough and edge of Leicester, a number of the Other Settlements offer the opportunity to help accommodate future growth requirements including any identified unmet needs from Leicester.</p> <p>5.4 The Councils now need to work with some urgency to reach an agreement on the strategy for accommodating Leicester's unmet needs so that this requirement can be properly factored in to the next stages in the preparation of the new Charnwood Local Plan.</p> <p>Broad Locations for Development</p> <p>5.5 The Discussion Paper outlines seven broad options for growth ranging from a focus on Leicester and Loughborough to a wider dispersed strategy with growth distributed across the settlement hierarchy. The option for a single standalone new settlement is also considered.</p> <p>5.6 The current spatial strategy as set out in the Core Strategy is one of urban concentration and</p>	

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	<p>regeneration. This has generally been successful in directing development to the sustainable locations adjoining Leicester and Loughborough and the more sustainable larger Service Centres.</p> <p>5.7 Given the scale of growth Charnwood will need to accommodate over the plan period to 2036 even without any provision for Leicester's unmet needs, the locational strategy will need to take full advantage of opportunities available for sustainable growth. It is considered that the most deliverable option is likely to include a mix of development focused on the existing urban areas of Leicester and Loughborough, development in smaller new settlements and growth directed to the Service Centres and Other Settlements. Option 6 as set out in the Discussion Paper, outlines a spatial approach focusing development on Loughborough, identified Urban Settlements and Service Centres along with new settlement options. It should also be acknowledged by the Council that smaller scale development may be appropriate in the Other Settlements. In our view Option 6 should be amended to consider opportunities for growth at 'Other Settlements'.</p> <p>5.8 The identification of sites at the Other Settlements should be included as proposed allocations in the next stages of the Local Plan to help meet the housing need in Charnwood Borough over the plan period.</p>	
<p>TLP/110 Pegasus on behalf of Jelson Homes & Davidsons Developments Ltd</p>	<p>1. INTRODUCTION</p> <p>1.1 These submissions are prepared on behalf of Jelson Homes and Davidsons Developments Limited who have interest in land to the east of Loughborough near to Cotes. The development is for a sustainable new settlement, Riggets Green to provide some 1,500 homes, 5.5 hectares of employment land, a new primary school and supporting services and facilities. The site is related to the SHLAA site reference PSH123.</p> <p>2. VISION FOR CHARNWOOD IN 2036</p> <p>2.1 The Core Strategy Vision for Charnwood 2011-2028 outlines that the demand for housing will be focussed on Loughborough and the edge of Leicester. The vision highlights Loughborough as the main economic, social and cultural heart of the Charnwood Borough. The focus on Loughborough as the most sustainable location for further growth in the Borough should still be supported. This is an accurate reflection of the role played by the town as the most sustainable location for growth in the Borough.</p> <p>2.2 It is noted that the Leicestershire Authorities have also published the Draft Leicester and Leicestershire Strategic Growth Plan which sets out a strategic vision for growth in the area up to 2050. As part of a consortium of developers, Jelson Homes and Davidsons Developments Limited made submissions to the Strategic Growth Plan consultation. That submission is relevant to the preparation of Charnwood's new local plan and should be taken into account by officers. For convenience, a copy of the response to the Strategic Growth Plan is attached to these representations.</p> <p>2.3 Paragraph 2.6 states 'having a clear vision is important for plan making as it provides the basis for</p>	<p>We note your comments in relation to land at Cotes on Vision for Charnwood, Areas of Local Separation and Green Wedges, the Settlement Hierarchy and Settlement Limits and the Housing Strategy Options. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>We also note the additional information provided.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p>

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	<p>prioritising competing issues and understanding impact'. Although evidence has been produced to recognise the Borough's challenges these cannot yet be translated into an updated Vision for Charnwood until the most appropriate locational strategy to deliver sustainable development has been identified.</p> <p>2.4 Sustainable Urban Extensions to the West of Loughborough and Thurmaston were promoted within the Core Strategy. These two sites are specifically mentioned in the Vision, however, we consider that it should be acknowledged in an updated Vision for Charnwood that opportunities exist for other reasonable alternatives for sustainable development, including the creation of a new settlement east of Loughborough.</p> <p>3. AREAS OF SEPARATION AND GREEN WEDGES</p> <p>3.1 It has been a longstanding policy for the Charnwood area to identify structurally important areas of open land between Loughborough and the adjoining settlements of Shepshed, Hathern and Quorn, and safeguard these areas. The green wedge to protect the area between Loughborough and Shepshed was designated in the 2004 Charnwood Local Plan, but was removed in the adopted Core Strategy to allow for the allocation of a Sustainable Urban Extension to the west of Loughborough.</p> <p>3.2 The Green Wedge and Areas of Local Separation Review, dated March 2016, provides evidence of how different areas perform against the purposes of the respective designations set out in local policy.</p> <p>3.3 This report also identified land East of Loughborough as an Urban Fringe Green Infrastructure Enhancement Zones (GIEZ-5). The report states there currently are a number of weaknesses of the land East of Loughborough in terms of green infrastructure, including; existing GI assets and PRow disconnected from Loughborough, greenspaces unsuitable for recreation due to industrial or agricultural influences, key gateways are poorly defined or celebrated, and a lack of accessible natural open space.</p> <p>3.4 The report also identifies that the land East of Loughborough has opportunity to enhance the green infrastructure at this location. This can be done through integrating GI enhancements with new development, increasing provision or recreational open space along the eastern edge of Loughborough, integrating public accessibility with existing assets, strengthening the PRow network, diversifying land along the River Soar to create opportunity for biodiversity and forming a new 'green corridor'.</p> <p>3.5 The allocation of Riggets Green would support enhancement opportunities for the land east of Loughborough through infrastructure improvements and accessibility for the public.</p> <p>4. SETTLEMENT HIERARCHY AND SETTLEMENT LIMITS TO DEVELOPMENT</p> <p>4.1 The Settlement Hierarchy contained within the Discussion Paper has been informed by a Settlement Hierarchy Assessment (2018). The assessment informs the Council's Local Plan up to 2036 as to where new development should be located in the Borough to achieve sustainable patterns of movement and</p>	

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	<p>how local services and facilities can be supported.</p> <p>4.2 The site known as Riggets Green which is being promoted by Jelson Homes and Davidsons Developments Limited is a greenfield site to the east of Loughborough. The site is an available opportunity to create a new sustainable settlement within close proximity to the Urban Centre of Loughborough which would allow accessibility to the existing range of employment opportunities and higher order services that meet all of the day to day needs of residents. The nearest settlement to the proposed development site is Cotes, which is defined as a Small Village or Hamlet; a settlement that has limited services and facilities to meet the day to day needs of the residents, but it is acknowledged that Cotes has a good level of access to employment, higher order services and secondary schools in Loughborough.</p> <p>4.3 The Urban Centre of Loughborough is also described in the Settlement Hierarchy Assessment as being accessible to the surrounding area. The creation of a new settlement would not increase pressure on existing facilities and services at Loughborough or the nearest settlement (Cotes) as the scheme would include a new local centre, schools and sustainable transport routes. Employment land would also form part of the scheme. For further details of the proposed new settlement, refer to the Riggets Green Promotional Document enclosed.</p> <p>5. HOUSING STRATEGY OPTIONS</p> <p>5.1 In terms of housing need and supply, the discussion paper states that a minimum of 8,100 homes are needed to flexibly meet the needs in the Borough to 2036 over the commitment outlined in the adopted Core Strategy. Paragraph 4.5 of the Discussion Paper indicates a greater supply of land, for up to 15,700 homes, would maximise the potential for maintaining housing supply. We support this approach as this would provide necessary flexibility to take account of changing circumstances.</p> <p>5.2 Jelson Homes and Davidsons Developments Limited are promoting land at East of Loughborough for a residential development of around 1,500 dwellings. The site is suitable for the development of a sustainable new settlement, and is viable and deliverable. It is therefore important that the site should be considered as a reasonable option to be considered for allocation.</p> <p>5.3 Option 6 of the Strategy Options allows for development to be directed to Urban Centres, Urban Settlements and Service Centres and New Settlements. This would ensure maximum capacity at locations which are most accessible to jobs, services, facilities and public transport, whilst development at new settlements would be supported by new infrastructure without putting strain on existing infrastructure in the Borough. The land east of Loughborough is identified in the Discussion Paper as one of four potential locations for new settlements (SHLAA ref PSH123).</p> <p>5.4 As stated at Paragraph 4.40, the combination of development at the urban areas and new settlements has the potential to have less impact on environmental factors such as biodiversity, flood</p>	

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	<p>risk, water quality and the historic environment. The enclosed Promotional Document for Riggets Green demonstrates how the development works with the constraints of the site and would ensure that there is no impact to historic assets and there are opportunities to enhance the natural environment.</p> <p>5.5 We would therefore support Option 6 as the Housing Strategy for Charnwood to take forward in the Local Plan Review.</p> <p>Further documents/information submitted with representation ref: TLP/110</p>	
<p>TLP/111 Leicestershire County Council</p>	<p>Economic Growth and Strategic Planning Note consultation on the draft Local Plan will take place in October 2018, and the purpose of this consultation is to explore the evidence and the development strategy options available for the new local plan.</p> <p>Pleased to see references to the emerging L&L Strategic Growth Plan throughout the document. We would wish to see the emerging L&L Strategic Growth Plan forming a strong context for the content of the draft Local Plan in October 2018.</p> <p>Reference also needs to be made to the emerging Local Industrial Strategy being prepared by the LLEP.</p> <p>From an economic growth and strategic planning perspective options 1, 2, 5, 6 and 7 are preferred, or a combination of spatial elements drawn from these options. In relation to new settlements the proximity and relationship to existing settlements, within and adjacent to the Borough, will be an important factor as this will shape how the new settlement is likely to function and inform how it is likely to impact on existing communities.</p> <p>The Areas of Local Separation and Green Wedges Review is supported given the form and identity they can give to existing and the formation of future communities.</p> <p>Children and Family Services</p>	<p>We notes your comments related to a range of different service areas including Economic Growth and Strategic Planning, Children and Family Services (Education), Transport Strategy and Policy, Environment and Strategic Property.</p> <p>We note your comments on the Area of Local Separation and Green Wedges, housing strategy options and the Strategic Growth Plan and Local Industrial Strategy. The Council will continue to work with the other Leicester and Leicestershire Housing Market Area authorities under the duty to cooperate.</p> <p>The Towards a Local Plan consultation has been informed by the Strategic Housing Land Availability Assessment which included sites which developers would like to promote for residential development. No decisions have been made at this stage about any of these sites and their suitability for</p>

Pupil Places generated by Proposed Settlement Category

PROPOSED SETTLEMENT CATEGORY	SETTLEMENT	CAPACITY	Primary	Secondary	Post 16
		(Number of Homes)	4-10 yrs	11-16yrs	
Urban Centre	Loughborough	5,509	1653	920	29
Urban Settlement	Shepshed	2,765	830	462	15
	Birstall	45	14	8	0
	Thurmaston	925	278	154	5
	System	1,684	505	281	9
	Edge of Leicester	692	208	116	4
Service Centre	Anstey	952	286	159	5
	Barrow Upon Soar	1,055	317	176	6
	Mountsorrel	67	20	11	0
	Quorn	674	202	113	4
	Rothley	686	206	115	4
	Sileby	1,145	344	191	6
Other Settlement	See Table 3 for settlement list	2,966	890	495	16
Small Village or Hamlet	See Table 3 for settlement list	735	221	123	4
New Settlement	Near Barkby	690	207	115	4
	Near Thurmaston	576	173	97	3
	Near Cotes	975	293	163	5
	Near Wymeswold	770	231	129	4

Education Requirements

Urban Centre

) Loughborough 1653 yield Primary Places = 2x 3FE primary schools of 630 places each and a site area of 2.9 hectares and 1 x 2FE primary school of 420 places and a site area of 2 hectares. 920 yield secondary places = 1 secondary school with a site area of 6.8 hectares.

Urban Settlement

) Shepshed 830 yield primary places = 2x 2FE primary schools of 420 places each and 2 hectares per site. 462 yield secondary places – extend the secondary school taking pupils from the development.

) Birstall 45 yield primary places = 14 primary places would look to remodel/expand an existing school. 8 yield of secondary places would look to accommodation at secondary school taking pupils from the development.

) Thurmaston 278 yield of primary places = 1.5 FE school 278 places but the infrastructure for 315 places and a site of 1.6 hectares. Or could add to new school provision on North East of Leicester SUE (LA has land reserved on the development to expand 1 FE school). 154 yield secondary places – extend the secondary school taking pupils from the development.

) System 505 yield Primary Places = 1x 2.5FE primary school of 525 places and a site area of 2.4 hectares. 281 yield secondary places would look to accommodation at secondary school taking pupils from the development.

) Edge of Leicester 208 yield Primary Places = 1x 1FE primary school of 210 places and a site area of 1.1 hectares. 116 yield secondary places would look to accommodation at secondary school taking pupils from the development.

allocation in the Draft Local Plan as residential sites. We welcome ongoing cooperation in developing our policies.

The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be accompanied by an appropriate range of evidence, and supporting documents.

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	<p>Service Centre</p> <p>) Anstey 286 yield Primary Places = 1.5 FE school 286 places but the infrastructure for 315 places and a site of 1.6 hectares. 159 yield secondary places – extend the secondary school taking pupils from the development.</p> <p>) Barrow Upon Soar 317 yield primary places = 1.5 school 315 places and a site of 1.6 hectares. 176 yield secondary places would look to extend the secondary school taking pupils from the development.</p> <p>) Mountsorrel 67 yield primary places = 20 primary places would look to remodel/expand an existing school. 11 yield of secondary places would look to accommodation at secondary school taking pupils from the development.</p> <p>) Quorn 202 yield Primary Places = 1 FE school 210 places and a site of 1.1 hectares. 113 yield secondary places would look to extend the secondary school taking pupils from the development.</p> <p>) Rothley 206 yield Primary Places = 1 FE school 210 places and a site of 1.1 hectares. 115 yield secondary places would look to extend the secondary school taking pupils from the development.</p> <p>) Sileby 344 yield primary places = 1.5 school 315 places and a site of 1.6 hectares and look to provide the remaining 29 places at an existing school. 191 yield secondary places would look to extend the secondary school taking pupils from the development.</p> <p>Other Settlement</p> <p>) See table 3 for settlement list? 890 yield primary places = 2x 2FE primary schools of 420 places each and 2 hectares per site and look to provide the remaining 50 places at an existing school. 495 yield secondary places would look to extend the secondary school taking pupils from the development.</p> <p>Small Village or Hamlet</p> <p>) See table 3 for settlement list? 221 yield primary places = 1x 1FE primary schools of 210 places and 1.1hectares and look to provide the remaining 11places at an existing school. 123 yield secondary places would look to extend the secondary school taking pupils from the development.</p> <p>New Settlement</p> <p>) Near Barkby 207 yield Primary Places = 1 FE school 210 places and a site of 1.1 hectares. 115 yield secondary places would look to extend the secondary school taking pupils from the development.</p> <p>) Near Thurcaston 173 yield Primary Places = 1FE school 173 places but the infrastructure for 210 places and a site of 1.1 hectares. 97 yield secondary places would look to extend the secondary school taking pupils from the development.</p> <p>) Near Cotes 293 yield Primary Places = 1.5 FE school 293 places but the infrastructure for 315 places and a site of 1.6 hectares. 163 yield secondary places would look to extend the secondary school taking pupils from the development.</p> <p>) Near Wymeswold 231 yield primary places = 1FE school 210 places and a site of 1.1 hectares and look to provide the remaining 21 places at an existing school. 129 yield secondary places would look to extend the secondary school taking pupils from the development.</p>	

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	<p>The above response is based on the additional houses being proposed in the table entitled 'Pupil Places generated by Proposed Settlement Category'. It is understood that this is in addition to the housing developments stated in the current local plan e.g. North of Birstall, West of Loughborough and North East of Leicester etc. I have been unable to locate Table 3 to view the settlement list to provide a more specific response regarding the following categories: Other Settlement or Small Village or Hamlet.</p> <p>It is also important to note that for Charnwood Borough Council to deliver some of the options, in some instances, it may be necessary for the Local Authority to have additional land to meet educational requirements. This requirement will be more specific to smaller developments that are scattered across an area e.g. Sileby with several developers involved. In this instance the LA would expect the developers within the vicinity to either make available the land free of charge or contribute towards the purchase of the land.</p> <p>Transport Strategy and Policy Consultation response of Leicestershire County Council as Local Highway Authority</p> <p>NB: All headings, paragraph references, etc. are as per the Consultation document.</p> <p>Chapter 1: Introduction No comments.</p> <p>Chapter 2: Context for Preparing a Development Strategy for Charnwood National and Strategic Policy Framework Paras 2.2-2.3: Noting the stated intention that '<i>The Charnwood Local Plan will take account of the Strategic Growth Plan</i>' and moreover that the early years of the SGP (2031-36) overlap with the latter stages of the proposed Local Plan period, the Local Highway Authority (LHA) is keen to understand at an early stage how the Borough Council are planning to reflect this in their vision for Charnwood in 2036, as well as through the approach taken to developing the spatial strategy for the proposed Local Plan.</p> <p>Vision for Charnwood Paras 2.4-2.6: The LHA remains supportive of the existing vision, but extending from the points made in relation to paragraphs 2.2-2.3, it is keen to understand at an early stage how this may evolve through to 2036 to take account of the emerging Strategic Growth Plan proposals as a basis for considering the associated transport implications.</p> <p>Key Issues and Evidence Para 2.8 (the balance of homes and jobs): Fully support the principle of locating homes and jobs in locations which minimise the need to travel, albeit noting the key challenge that those locations which</p>	

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	<p>have the greatest scope to achieve this (namely the edge of Leicester and Loughborough) are also amongst the most challenging locations in the Borough in terms of wider transport considerations and the potential infrastructure required to address this.</p> <p>Paras 2.13-2.14 (Transport – travel to work, congestion, capacity): Agree with all the points raised but would seek to amplify/reiterate some key additional issues raised previously as follows:</p> <ul style="list-style-type: none">) Existing pressure along the length of the A46 Leicester Western Bypass and other key corridors in and around the north side of the Leicester Principal Urban Area (PUA), with substantial strategic growth already committed to this area, most notably Ashton Green, Broadnook and North East of Leicester SUEs. This is complicated by the fact that much of this growth and resulting impacts are cross-boundary in nature (i.e. overlapping with Leicester City and neighbouring Leicestershire Districts) and will require a coordinated approach with the relevant highway and planning authorities to address.) Flood resilience issues on key transport corridors within the Soar Valley, meaning overall connectivity in this area is less reliable than other areas of the Borough and could require strategic-level mitigation to address.) The M1 and A512 remain both a physical and congestion/capacity barrier between Loughborough and Shepshed, notwithstanding planned improvements to M1J23 and the A512 corridor to accommodate already committed growth in the area.) The need to preserve and where possible enhance the existing strong commercial public transport network across the Borough.) The potentially transformational implications of HS2 as well as Midlands Connect and Strategic Growth Plan transport proposals (i.e. A46 expressway) for wider connectivity to/from the Borough.) The emerging concept on the Major Route Network (MRN) – although the details around government’s plans for the MRN are still to be confirmed the function of the most important and highest-quality routes maintained by the LHA within the Borough, such as the A6, will likely be an important theme to consider in the development of the plan and transport evidence base. <p>Given the likelihood of implications for the strategic road network, early engagement with Highways England is strongly recommended if not taking place already.</p> <p>Paras 2.28-2.34 (access to facilities and services): Broadly concur with the proposed settlement hierarchy from a transport/accessibility perspective based on the <i>current situation</i>. (Will the Local Plan development process be giving any consideration to as to how some of the current settlement designations may evolve as a consequence of already committed growth and/or some of the proposed spatial options, in particular smaller settlements in the vicinity of the ‘edge of Leicester’ and/or possible new settlement options?)</p> <p>No comments on the Settlement Limits to Development Assessment.</p>	

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	<p>Paras 2.35-2.38 (the need for infrastructure): Subject to the development of necessary evidence, it could be possible that further significant transport infrastructure investment (i.e. beyond that already identified in the current Local Plan) could be required to enable/support growth. (See also comments on Development Strategy Options.)</p> <p>Chapter 3: How Much Development is Needed? No comments.</p> <p>Chapter 4: What are the Reasonable Development Strategy Options? Housing Strategy Options General comment: The proposed development of a new A46 expressway passing through the south-eastern corner of Charnwood District (as per the proposals currently being promoted as part of the Midlands Connect/Engine agenda), has the potential to open up substantial new opportunities for growth within the Borough. It is recognised that its full delivery will require a very large scale investment over a sustained period, but nevertheless to what extent is the A46 Express Way likely to figure in respect of the new Local Plan taking into account the Strategic Growth Plan, especially in respect of spatial options considerations?</p> <p>Paras 4.4-4.8 (Growth Scenarios): At this point in time there is insufficient evidence for the Local Highway Authority to advise whether (or not) any specific growth scenario can be accommodated in transport terms and what (if any) specific transport measures are required to achieve this. This will ultimately need to be picked up as part of the transport evidence base work for the Plan.</p> <p>Para 4.9 (We also want to hear your views about the right mix of site sizes to facilitate delivery whilst supporting the provision of infrastructure): Experience shows that concentrating growth at larger SUE-type sites provide greater scope to secure significant transport infrastructure/mitigation than spreading growth across a range of smaller sites; noting, however, the counterbalance that delivery timescales for such sites and infrastructure are normally longer.</p> <p>Where growth in a specific location/area is to be dispersed across a number of smaller sites, the ability to pick up the full impact and secure necessary mitigation accordingly through the normal development management process is reduced. In such circumstances, further proactive work by the LHA and LPA may be required to identify the necessary mitigation as a basis for securing contributions towards this mitigation through the development management process (e.g. through the joint development of particular Transport Strategies).</p> <p>Para 4.11 (Broad Locations for Housing Development): Noting that most of the strategy options seek to maximise housing growth on the edge of Leicester in the first instance, this has the potential to ensure the best possible access to/from jobs and services/facilities via sustainable modes of travel. However, given the distance of most potential locations for new residential development from the city</p>	

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	<p>centre (as the primary centre for jobs and services within the Leicester PUA) means that securing high-quality public transport links into the city centre and other key locations (as appropriate) it will be essential to ensure that the sustainable credentials of an 'edge of Leicester first' approach are fully realised.</p> <p>It is also noted that the existing traffic issues and challenges (as highlighted previously) around the northern side of the PUA means that significant new infrastructure (over and above that already planned) may be required to support further strategic growth in this area.</p> <p>Paras 4.13-4.30 (Options 1-4): Noting that options 1-4 propose increasing levels of dispersal of growth based on the settlement hierarchy, the LHA supports the general principle of concentrating new growth in the principle urban areas of the Borough in the first instance, given that these locations provide the greatest opportunities for sustainable travel to/from jobs and facilities (conversely, the smaller settlements at the bottom end of the settlement hierarchy are likely to provide very limited opportunities at best in this respect).</p> <p>However, LHA is also aware that the principle urban locations tend to have the greatest existing traffic pressures and challenges within the Borough and that potentially significant new transport infrastructure may therefore be required to facilitate this additional growth (added to which, noting that in the case of option 1, i.e. Edge of Leicester and Loughborough/Shepshed only, there is insufficient land capacity to accommodate the higher growth scenario).</p> <p>Given the above, the LHA recognises that a balance will likely need to be struck between maximum concentration and dispersal of growth across the Borough based on both transport and wider considerations, and that a transport evidence base, proportionate to its overall importance as a factor, will need to be developed to support this process.</p> <p>Paras 4.31-4.43 (Options 5 and 6): The same principles set out in our comments for options 1-4 are applicable to options 5 and 6 as well.</p> <p>Additionally however, with regards to new settlements; unless these sites are of a scale to incorporate sufficient levels of onsite jobs, services and facilities, in practice they are unlikely to operate as genuine standalone, self-contained settlements and are likely to generate a high proportion of external trips. If this is the case here, an understanding of the proximity and relationship to other, existing settlements/service centres within and adjacent to the Borough will be critical to establishing whether the 'new settlement' options can be made sustainable in transport terms.</p> <p>Paras 4.44-4.49 (Option 7): In principle, a major new settlement of 8,000-10,000 dwellings could theoretically provide the opportunity to create a genuinely self-contained urban area with good opportunities for sustainable travel to/from jobs and facilities (although the proximity to and relationship</p>	

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	<p>with other, existing settlements will be a crucial factor in this). It could also potentially provide scope to proactively plan and deliver the transport infrastructure required to support development in a more integrated fashion than possible for extensions to existing urban areas.</p> <p>It is noted, however, that no specific proposals currently exist for this particular option. In the absence of this information, it is not possible to comment on the potential suitability (in transport terms) of particular locations for a major new settlement at this stage.</p> <p>Employment</p> <p>4.53 Option 1: No comments</p> <p>4.55-4.57 Option 2: Whilst the net implications of this option may not be significant (because the overall level of employment land in the Borough would remain the same), specific changes arising from any proposals for newly allocated employment land or for reuse of existing employment land would need to be subject to appropriate transport assessments. This may need to be addressed as part of the Local Plan evidence work and/or through the development management process.</p> <p>4.58-4.60 Option 3: Any proposals for newly allocated employment land would need to be subject to appropriate transport assessments. This may need to be addressed as part of the Local Plan evidence work and/or through the development management process.</p> <p>Chapter 5: Sites that are Available</p> <p>General comment: The LHA has not reviewed the sites. It reserves the right to make comments on/further comment on specific sites both through the Local Plan development process and through the development management process as necessary. .</p> <p>Chapter 6: What Happens Next</p> <p>Para 6.1: No specific comments to raise on the wider evidence documents listed.</p> <p>Para 6.4 (specific questions to consider when responding to the consultation):</p> <ul style="list-style-type: none">) Are there any other reasonable alternatives that can accommodate the need for homes and jobs? No comments.) Do you have any comments on how the reasonable options have been sustainability appraised? No comments.) Can you put forward any additional land that is available for development that has not been identified in the Council's Strategic Housing Land Availability Assessment? No comments.) Do you think that the Council's vision is correct? Are there parts of it that need to change or could be added to? See previous comments in relation to paragraphs 2.4-2.6.) What evidence do you think the Council needs in order to identify its development strategy to 2036? At the local plan stage the LHA would seek to understand the following from the evidence 	

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	<p>base:</p> <ul style="list-style-type: none">) The impact of the planned growth on the highway network and any other transport factors) The nature of the mitigation required as a result) If it is reasonable to suppose it can be delivered as necessary (within the plan period) <p>It is anticipated that this evidence base would be informed by some strategic modelling undertaken using LLITM. The level of transport evidence ultimately required will depend on the level of importance attributed to transport as a determining factor for developing the Local Plan at various stages. Again the LHA has found that a transport evidence base that considers planned growth of both housing and employment provides the most comprehensive basis for comment and allows the fullest answers to the questions set out above.</p> <p>Early engagement with other key highway authorities (in this case Highways England, Leicester City and Nottinghamshire) is advised.</p> <p>The LHA would expect the Local Plan to provide a clear approach to funding of and delivery arrangements for transport infrastructure.</p> <p>Environment</p> <p>Please note that due to the tight timescale for reviewing the information, we have not been able to fully comment at this stage.</p> <p><i>It would be expected by LCC environment and waste staff that the development of the Plan would be in accordance with the guidance set out in the “Landscape Sensitivity and green infrastructure study for Leicester and Leicestershire” Oct 2017 -prepared by Land Use Consultants for LCC (in particular, the Northern Gateway Strategic Opportunity Assessment Zone (SOAZ) and the Eastern Growth Corridor - North SOAZ).</i></p> <p>Strategic Property</p> <p>Perspective of the County Council as a landowner with property interests in the Borough:-</p> <ol style="list-style-type: none"> 1. <u>Settlement Hierarchy</u> – The settlement hierarchy appears to mirror that within the Core Strategy and is supported in that it recognises the level of services and community facilities available to support the community and the transport links to major settlements and the wider area. 2. <u>Housing</u> <ol style="list-style-type: none"> a. The methodology of determining the OAN by reference to the HEDNA is supported. However, in addition account has to be taken of the duty to co-operate. It is widely recognised that Leicester City will have a significant shortfall in land supply in the period to 2036 and this will need to be absorbed elsewhere within the HMA. Equally, some of Charnwood’s housing needs may be 	

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	<p>capable of being met outside the borough.</p> <ul style="list-style-type: none"> b. Housing mix should take account of the needs of the community in particular the unfulfilled requirements for affordable and starter homes, including exception site provision in smaller settlements, and recognise the impacts of the ageing population. c. Option 2 is seen as the preferred housing option as it allows a co-ordinated approach to infrastructure delivery and supports existing services and facilities thereby maintaining the sustainability of all key settlements across the borough. It also concentrates development along existing major transport corridors enhancing the potential for greater connectivity. d. In addition, the plan needs to recognise the ability of smaller settlements to deliver small windfall sites within limits of development to further boost housing supply. <p>3. <u>Employment</u> –</p> <ul style="list-style-type: none"> a. The retention of the existing allocations within the Core Strategy, particularly LUSEP, is strongly supported. b. The additional land required to fulfil the needs of the Borough should, as far as possible be located within key settlements or co-located with major housing allocations to reduce the need for car use. c. The mix both in terms of employment use and unit size should match the latest employment needs survey which identified areas of under provision /market failure within the borough. d. A detailed submission will be made in respect of sites at Quorn that are actively being promoted for employment uses. 	
<p>TLP/112 William Davis</p>	<p>Consultants on behalf of William Davis Ltd have made separate representations on the above consultation document in respect of the Company’s land interests adjacent to the Black Brook/West of Tickow Lane (Marrons Planning) and at South Loughborough (LRM Planning Ltd – the latter site being promoted in consortium with Parker Strategic Land). This further representation should be read in conjunction with these separate submissions, as it deals with the Company’s further land interests in the Borough.</p> <p>Development Strategy Options</p> <p>William Davis support the Broad Location for Housing development described as Option 3- Settlement Hierarchy Distribution. We consider that a strategy of more dispersed growth will be best able to ensure effective delivery of the required housing numbers over the Plan period. To ensure effective delivery it essential that a mixed portfolio of large, medium and smaller sites is provided in areas of high demand, and with good access to facilities and employment. The Urban Areas, and Service Centre’s are the most sustainable locations for development but certain of the ‘Other Villages’ are also capable of providing for small/medium scale development in a sustainable manner. We do consider, however, that there is merit in considering a further refinement of the settlement hierarchy to further define what constitute ‘Key’ other villages; reflecting both the range of facilities, recent/committed development and/or capacity/suitability for further growth. We would recommend</p>	<p>We note your comments on the development strategy options, the settlement hierarchy, settlement limits to development and areas of local separation. We also note the information provided on sites available. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p>

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	<p>putting the following villages into this category:</p> <p>Woodhouse Eaves Hathern Queniborough East Goscote Cossington Wymeswold Rearsby Burton on the Wolds</p> <p>These villages all come into the top ranked 'other' villages in the Council's Settlement Hierarchy Assessment (Figure 10: Settlement Audit Summary) with the exception of Burton on the Wolds which is shown ranked below the village of Barkby. This appears to be due to the approach taken towards 'access to employment' in the Assessment; which is based wholly upon bus frequency. We take issue with this approach, as where there are substantial employment opportunities locally we consider that the issue of bus access should not be an overriding consideration.</p> <p>Burton on the Wolds benefits from close proximity to both the Wymeswold Industrial Estate and the Cooper Bussman Electrical Engineering plant; both of which are considered within easy reach (under 800m) of the settlement. A successful appeal for 32 dwellings in Wymeswold was granted based on the sites' access in relation to the former of these employment locations (APP/X2410/A/13/2194622); where the Inspector noted Wymeswold "performs well in terms of access to jobs" and "has an industrial estate where the only objective evidence suggests that there may be up to 400 jobs." Burton on the Wolds benefits from even closer proximity to these job opportunities than Wymeswold itself, and this provides justification, in our view, for both settlements being ranked comparably in terms of sustainability.</p> <p>We consider that this approach is more closely aligned to the positive policy stance taken towards sustainable development in the rural areas by virtue of para 54 and 55 of the NPPF and paragraphs 79 and 80 of the recently published draft replacement Framework.</p> <p>Settlement Limits to Development Assessment. William Davis Ltd are concerned with the notion of proposing new detailed settlement limits for all settlements within Charnwood in advance of final decisions being made on the overall housing distribution strategy and choices being made on what specific sites are required to be allocated. The whole exercise appears pointless and will require further major review once the Local Plan is progressed to preferred sites and proposed allocations. It will also thoroughly confuse the public who may consider the suggested limits to now be fixed.</p>	

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	<p>We also consider that there is a strong case for the new Local Plan not progressing detailed settlement limits in any event as they are essentially restrictive and contrary to the positive approach towards development management advocated by the NPPF. Numerous local planning authorities have abandoned the whole principle of development limits because of these considerations, e.g. Harborough District Council. It is also arguably a task that should be delegated to Neighbourhood Plans if Parishes wish to pursue this approach.</p> <p>Sites that are Available</p> <p>In addition to land West of Tickow Lane and Land South of Loughborough (referred to above) William Davis has an interest in the following sites that are currently recorded in the Consultation Document as 'Sites Promoted/Suggested for Development:</p> <p><u>Land to the Rear of Snells Nook Lane PSH133</u></p> <p>This site is currently allocated as part of the Science Park but emerging masterplan's have indicated that the land would be planned as part of the green infrastructure setting of the development rather than part of the key development cells. In our view better use can be made of the land for residential development with access off Snells Nook Lane without prejudice to the Science Park. The site extends to 7.7ha hectares and could yield circa 140 dwellings.</p> <p><u>Land off Melton Road, Burton on the Wolds PSH97</u></p> <p>We have already submitted a detailed site assessment and development framework for this site which demonstrated how the site could be developed and its relationship to the built form of the village. This provided for vehicular access from Melton Road and would have the benefit of creating the potential for a safe pedestrian link to existing properties in the Seals Close/Sowters Lane area. We have recently commenced pre-application discussions on this site with capacity now assumed to be circa 70 dwellings (see further Concept Plan attached).</p> <p><u>Land at Buddon Lane, Quorn PSH44</u></p> <p>This site owned by William Davis Ltd. It relates well to the surrounding built up area and is not subject to any environmental or technical constraints that limit the prospects for it coming forward for development. We have recently met with the Quorn Neighbourhood Plan Working Party to discuss development of the site in the context of the Neighbourhood Plan. We have secured an access solution to the site which avoids using Buddon Lane itself but this is confidential at this stage. We will endeavour to the make the details of this known to the Borough Council, and Neighbourhood Plan Working group, as soon as possible. We, consider that the capacity of the site is circa 50 units.</p> <p>Other Available Sites</p> <p>We would like to put forward some further additional sites for consideration in response to the 'call for sites' as part of this consultation. Separate SHLAA proforma's attached:</p>	

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	<p><u>Land off Homefield Lane/Loughborough Road (old A6)</u> These land parcels lie adjacent to PSH 135/PSH 299 which are presently being developed (Rothley Meadow development – 250 dwellings). We agree with the conclusions of the Areas of Local Separation and Green Wedges Review that the Local Area of Separation (ALS) in this area should be realigned to take into account the committed development; with the ALS restricted to open land associated with the new link road between Mountsorrel Lane and Loughborough Road delivered by this development. These proposed changes to the ALS open up land adjacent to Loughborough Road and Homefield Lane with potential for development. The former land parcel (currently occupied by the Nursery/Garden Centre) is owned by William Davis. The latter land parcel, on Homefield Lane, is owned by others but these parties are supportive of development. The two parcels could together yield circa 225 dwellings.</p> <p><u>Land off Zouch Road, Hathern</u> William Davis own 3ha of land to the north of the recent Daisy Bank development in Hathern. Vehicular access would be proposed from the Zouch Road but with potential for direct pedestrian/cycle access into Hathern from within the Daisy Bank development and Green Hill Rise. The site is capable of accommodating circa 60 dwellings.</p> <p>Further documents/information submitted with representation ref: TLP/112</p>	
<p>TLP/113 Savills on behalf of Taylor Wimpey</p>	<p>1. Introduction 1.1. Savills is instructed to act on behalf of Taylor Wimpey UK Ltd to provide a response to the matters raised in the Charnwood Borough Council document “Towards a Local Plan for Charnwood – Charnwood Local Plan to 2036”. This response is submitted as part of Taylor Wimpey’s ongoing land interest on the site known as “South East of Syston”. This land has been submitted for consideration previously, most recently in response to the Charnwood Borough Council “Call for Sites” in 2017. In the Council’s most recent Strategic Housing Land Availability Assessment (SHLAA), the site was given the reference “PSH69” and the site is included, using that reference, at Appendix C of the current consultation document.</p> <p>1.2. The site amounts to around 80 hectares of agricultural land on the southeastern edge of Syston. The site lies to the south of Barkby Road and existing residential development at St Paul’s Drive, Pine Drive and Cedar Drive, all of which are located within Syston. The western boundary of the site is defined largely by the railway line that links Syston to Leicester. To the north lies existing residential development and Merton Primary school. Further fields lie beyond the site to the east.</p> <p>1.3. Most recently, in May 2018, representations by Taylor Wimpey in respect of this site were made to the Consultation Draft of the Leicester and Leicestershire Growth Strategy. Those representations were supported by an Indicative Site Concept (Drawing No: SK05 Revision A) which is attached as Appendix 1 of this Statement.</p>	<p>We note your comments which relate to land south east of Syston. No decisions have been made at this stage about the preferred approach and the individual sites which would deliver the approach. The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p> <p>We also note the additional information provided. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p>

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	<p>1.4. The site concept plan shows that, of the 80 hectares within the site, 49.21 hectares would be provided as green open space. Residential areas would total 29 hectares and, even if built out at a relatively low density of 30 dwellings to the hectare, circa 870 dwellings could be achieved. It is likely that, through a detailed masterplanning exercise, this site could deliver closer to 1,000 dwellings.</p> <p>1.5. The primary means of vehicular access will be proposed from St Paul's Drive and Pine Drive. The site has potential to provide an extended site for the existing primary school to accommodate future demand if so required or alternatively this land could be used for District Centre/Community Facilities.</p> <p>1.6. The site is extremely well located to make a meaningful contribution to the housing need of Charnwood as it looks forward to 2036 to allocate sufficient housing to meet its Objectively Assessed Need (OAN). It is noted that the consultation document indicates that land for nearly 6,500 houses still needs to be found. However, in meetings between Taylor Wimpey and Richard Brown in the Charnwood Borough Council Planning Policy team, it has been suggested that land for around 8,000 homes needs to be found. This Statement will demonstrate that this site is exceptionally well located to make a meaningful contribution to that housing requirement in line with the majority of growth strategies outlined in the consultation document.</p> <p>1.7. As per the site concept plan, the development would also provide nearly 50 hectares of open space, which would also help to retain a buffer between Syston and the "North East of Leicester" strategic urban extension which is a cornerstone of the current growth strategy contained within the Charnwood Core Strategy 2028. This would help to create a highly attractive extension to Syston that would help to protect the environment of the area by creating a new landscape "edge" that clearly defines the boundary of the town.</p> <p>1.8. Through new tree and woodland planting, this development would better integrate the settlement into its surrounding countryside. The open space will enhance the local landscape, offering improvements to boundary hedgerows and providing new habitats.</p> <p>1.9. There is also clear potential that this approach will support the designated Area of Local Separation, through retaining a significant area of undeveloped landscape, improving public access and contributing to an improved green network. Through the development management process, these enhancements can all be secured by Charnwood Borough Council in perpetuity. A Landscape and Visual Impact Appraisal (LVIA) from EDP, the client's Landscape Architect, is attached as Appendix 2 and is discussed in more detail later in this Statement.</p> <p>1.10. The site is extremely well located in terms of offering a location that could provide benefits for the wider community. Whilst the Indicative Site Concept shows the potential to provide additional land to extend the adjacent primary school, the site could offer a range of facilities that will benefit the town, dependant on local needs.</p>	

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	<p>1.11. The site has the potential to link into public highway to the immediate northwest of the site. From here, Syston railway station is approximately a five minute walk from the site and so this site should be considered highly sustainable particularly given the focus on improving rail travel in the Midlands Connect Strategy which confirms that the improvement of Birmingham to Leicester rail services is an early priority for the Strategy. The aim is to reduce the journey time to around 36 minutes. From Birmingham, commuters will be able to connect with the HS2 services that will link the Midlands to London via high speed rail. The Strategy also seeks to improve the journey time into Nottingham to less than 25 minutes.</p> <p>1.12. Given the existing concerns over traffic congestion in the area, we consider that our clients' site should be considered favourably given its proximity to Syston railway station. It is likely that a significant proportion of trips from the site would be on foot as commuters walk to the railway station to take advantage of the improved train services available in the local area.</p> <p>1.13. Overall, it is clear that this site continues to offer an extremely sustainable location for new housing in one of the most sustainable settlements in Charnwood. Indeed, the Settlement Hierarchy Assessment that has been published in support of this consultation shows that the sustainable credentials of Syston have increased since the Core Strategy was adopted in 2015. Previously listed as a Service Centre, Syston is now considered an Urban Settlement.</p> <p>1.14. Therefore, we consider that it is abundantly clear that this site should be favourably considered as a potential allocation in the emerging Local Plan 2026.</p> <p>1.15. The remainder of this statement will focus on the questions posed and issues raised in the consultation document with particular reference to this site where relevant. These questions are not numbered, and not all of them are relevant to our client's land interests in Charnwood, but those that are will be considered in order on a chapter-by-chapter basis.</p> <p>2. Response to questions within Chapter 2 Vision for Charnwood – Paragraph 2.6 of consultation document</p> <p>2.1. The consultation document references the Vision for Charnwood that formed the basis of the 2011-2028 Core Strategy document. The vision is based on five key points as follows:</p> <ul style="list-style-type: none"> · Loughborough's role in the knowledge based economy being recognised; · The landscape, ecology and heritage being in a good state; · The picturesque villages being retained for their strong sense of identity; · The demand for housing being focussed on Loughborough and the edge of Leicester; and · The community having access to jobs and services to suit their needs <p>2.2. The consultation document goes on to ask whether this vision is suitable looking forward for the</p>	

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	<p>period up to 2036 or whether it needs to evolve to reflect the updated competing pressures on the district.</p> <p>2.3. It is clear that the demand for housing is continuing to increase in Leicestershire. Whilst the Council is currently only looking up to 2036, the Leicester and Leicestershire Growth Strategy, recently out to public consultation itself, is already looking forward to 2050.</p> <p>2.4. The January 2017 Leicester and Leicestershire Housing and Economic Needs Assessment (HEDNA) concludes that across the area covered by the Growth Plan, 96,580 homes and 367-423 hectares of employment are needed in the period 2011 – 2031. Through the process of updating the relevant Development Plans for each local authority area, it is accepted that most of the necessary housing and employment land needed up until 2031 has now been identified. This does require an element of Leicester City Council’s housing need being addressed as unmet need in areas outside its boundaries.</p> <p>2.5. By looking forward to 2050, the Growth Strategy is working on the notional target that 90,500 homes will be needed for the period 2031-2050. This additional growth will build on the existing settlement pattern with Leicester remaining the central focus surrounded by a ring of market towns. We support this approach.</p> <p>2.6. The consultation draft of the Growth Strategy states, “To date, the majority of new housing...has been built on small and medium-sized sites in the City, market towns, villages and rural areas...Often these developments make little or no contribution to infrastructure or services and, instead, rely on existing facilities. This has created significant problems.”</p> <p>2.7. As a consequence of this, the draft strategy proposes to focus, post 2031, on more development in “major strategic locations” that will, “allow us to plan for new housing and employment together with new and improved roads, public transport, schools, health services, local shops and open space.”</p> <p>2.8. The primary growth area in the Consultation Draft is the A46 growth corridor, intended as a new expressway to alleviate congestion to the south and east of the city of Leicester. This would extend from a revised junction 1 on the M69 to the southwest of Leicester, linking up with a new junction 20a over the M1 and continue around the south and east of the city . It is intended that the carriageway will re-join the existing A46 near Syston. This would combine with a number of other improvements to road and rail services to create a growth corridor that has the potential to accommodate about 40,000 new homes and additional new jobs.</p> <p>2.9. It is clear that the Growth Strategy represents a major “step-change” in how the future demands for housing and employment will be addressed by the ten organisations supporting the Strategy. We consider that the Vision for Charnwood needs to be updated to reflect this step-change in housing and</p>	

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	<p>infrastructure delivery.</p> <p>2.10. In particular, the current vision indicates that housing growth will be focussed on Loughborough and the edge of Leicester and a number of allocations and subsequent planning permissions have been made and granted in line with that spatial strategy. However, some of these allocations, such as Land to the North East of Leicester are yet to deliver housing at all. We understand that the North East of Leicester Strategic Urban Extension (SUE) may benefit from an outline planning permission but is currently unviable and is not proceeding.</p> <p>2.11. Therefore, we consider that a more wide reaching and ambitious vision for delivering housing in Charnwood is needed and that this updated vision should include a focus on the new opportunities for providing housing that the A46 growth corridor will unlock within the boundaries of the borough and should allow for that housing to be provided at major strategic locations.</p> <p>Areas of Local Separation and Green Wedges – Paragraph 2.21</p> <p>2.12. The current Core Strategy identifies 13 Areas of Local Separation to guide development and maintain the character of individual settlements. The Core Strategy also identifies Green Wedges that aim to maintain the network of gaps between settlements and provide dense corridors of valuable, publicly accessible green infrastructure.</p> <p>2.13. As part of the ongoing work on the Local Plan Review, the Council has reviewed the existing Areas of Local Separation and Green Wedges and proposes a number of amendments to them. It also proposes three new Areas of Local Separation. The consultation document asks for respondent's views on the proposed amendments, the findings of the study itself and how influential these areas should be on the overall development strategy.</p> <p>2.14. Firstly, it should be noted that this report is already two years out of date and this is the first opportunity to comment upon it. As such, it is not clear if the conclusions in the report are accurate today, given that development has continued in the two year period since the analysis was undertaken. Furthermore, as a general point, it should be noted that there is no national policy that would support nor encourage the provision of a policy that designates Green Wedges or Areas of Local Separation.</p> <p>2.15. Turning to the details of the Arup report, Site PSH69 sits partly within the proposed "Syston/Thurmaston" Area of Local Separation (ALS-L) and also a Green Wedge (GW-3). In broad terms, the western part of the site, where the majority of the housing would be located as per the Site Concept Plan, falls within GW - 3, and the smaller parcel of housing in the northeastern corner falls within ALS-L. The substantial areas of retained public open space fall within both areas.</p> <p>2.16. On behalf of Charnwood, Arup undertook an updated Assessment of the Green Wedges and Areas of Local Separation in March 2016. Each Green Wedge was assessed against four key purposes as follows:</p>	

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	<ul style="list-style-type: none"> · Merging of Settlements · Guiding Development Form · “Green Lung” · Recreational resource <p>2.17. The report concluded that the previous area covered by GW-3 had been permanently affected by the North East Leicester Strategic Urban Extension and that what remained met only one of the four purposes, “Merging of Settlements.” A potential realignment of the Green Wedge, known as PGW -1, was also considered and also found to only meet one of the four purposes. Therefore, the report recommends that the GW-3 should be removed from the new Local Plan.</p> <p>2.18. In more detail, the report concludes, “The area to the north of Barkby Lane, and the area to the west of the Midland Main Line, is not adjudged to meet three of the four Green Wedge purposes and is identified as a Zone of Weakness. As a whole, it restricts development (as opposed to guiding its form); aligns more with the open countryside than the adjacent settlement, failing to ‘penetrate’ it; and provides no formal and limited informal recreational opportunities (with no clear opportunities for enhancement). While there is more potential for the area to the west of the Midland Main Line to contribute to Purposes 3 and 4, it is physically severed from the wider Green Wedge by the development pattern proposed through the NE Leicester SUE.”</p> <p>2.19. We do not necessarily seek to contest the proposed removal of GW-3 from the Local Plan, particularly as there is no national policy support for a Green Wedge policy. Nonetheless, EDP have considered the Arup report in some detail and have outlined some issues with the methodology. As noted at Paragraph 5.6 of the EDP LVIA, “...the revised southern boundary of GW-3 still retains an area of weakness in terms of the existing landscape, where the boundary extends diagonally across a field from Barkby Lane towards the railway. This section of the boundary aligns with the boundary of the SUE.” The EDP report continues to outline how the prominent and unmitigated appearance of the settlement edge, and the detracting urbanising influence it has on the open landside character of GW - 3, has not been properly assessed in the Arup Assessment.</p> <p>2.20. Accordingly, EDP contend that, “...the Charnwood review appears to have focused on providing strong and defensible edges to the detriment of the protection of landscape character and principles of good design, stating (in terms of examples of boundary features lacking in durability) that “‘irregular’ or ‘inconsistent’ built form comprised of imprecise or ‘softer edges’, which would not restrict outward growth into a Green Wedge or [ALS]”. This is a key point which can be addressed by redevelopment of the site and design of a landscape strategy that creates an appropriate soft edge.”</p> <p>2.21. Careful consideration of the development layout and the interface between the built edge of the development and the open space beyond would clearly help to create a softer edge to the settlement that would result in a much better relationship between this part of Syston and its</p>	

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	<p>surrounding landscape.</p> <p>2.22. The EDP LVIA also considers the Green infrastructure benefits of this proposal, stating, “Furthermore, in terms of the enhancement of green infrastructure, as required by Local Plan Policy CS 12, development of the site..., offers the opportunity to not only retain open space with an open and undeveloped character, and retain existing tree and hedgerow features where appropriate, but also introduce public access within a site which currently has no public access. The proposed open space would increase overall public access within the landscape between Barkby and Syston, including providing access to Barkby Brook. Furthermore, the proximity of the SUE open space proposals to the south of Barkby Lane offers the opportunity to provide linkages and integrated open space, public access and green networks.”</p> <p>2.23. As the EDP LVIA explains, the Arup report is, somewhat by definition, not a report that necessarily provides a full and even-handed landscape assessment. Therefore, the potential landscape benefits of allocations within Green Wedges or Areas of Local Separation must be considered positively as part of the overall balancing exercise.</p> <p>2.24. The Arup report continues to consider the Areas of Local Separation and ALS-L is found to be performing strongly. Accordingly, the report concludes that ALS-L should be extended to include the remaining land of GW-3 to the west. This will mean that all of site PSH69 will fall within an Area of Local Separation.</p> <p>2.25. As per the LVIA, EDP considers, “...that this would seem a logical change to the designations, noting that the proposed development offers the opportunity to create a substantial area of green open space that would maintain the open character of the landscape within the [ALS], together with additional enhancement in terms of landscape, habitat and recreation.”</p> <p>2.26. Given the above, it is obviously important to consider how influential the Area of Local Separation should be when Charnwood progresses its Development Strategy in the new Local Plan. We are strongly of the opinion that it should not be used as a tool to restrict all development in the designated areas. This is particularly the case given the increasing need for new housing in Charnwood, both up to 2036 and looking forward to 2050. The impact of developing a site within an Area of Local Separation will need to be weighed against its benefits when the overall desire to promote sustainable development is considered as a whole.</p> <p>2.27. By their very nature, Areas of Local Separation are likely to be found on the edge of settlements and mostly consist of greenfield sites. As such, the need for housing and for the Council to maintain a healthy land supply means that the pressure to develop greenfield sites on the edge of settlements will continue. Thus, what is critical will be whether the purposes of including a piece of land within an Area of Local Separation would be unduly compromised by proposed development.</p>	

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	<p>2.28. To demonstrate this, and turning specifically to Syston, the sustainable credentials of the settlement to accommodate further housing development are clear. Furthermore, as this document will continue to demonstrate, other constraints such as floodplain are significant barriers to significant housing growth in Syston and how the Council chooses to balance these constraints when choosing which sites to allocate will be important.</p> <p>2.29. Currently, site PSH69 consists of agricultural fields with public access limited to a single footpath in the southeastern part of the site. It is accepted that the development of the northwestern and northeastern corners will run contrary to the aims of the Area of Local Separation. However, we consider that there are also clear benefits to be obtained from development of this site.</p> <p>2.30. As demonstrated by the Indicative Site Concept drawing, this proposal will have significant public benefits through the opening up of this site as publicly accessible green space and provide substantial new planting to better define the built and undeveloped areas of the site. Through the development management process, the Council can make arrangements, likely via a Section 106 agreement, to retain these areas in perpetuity as open, publicly accessible, amenity space. This will secure the long-term future of this site and give the Council control over one of its most important Areas of Local Separation. Furthermore, a bespoke landscaping scheme can be prepared that will better define the built edge of this part of Syston and provide for clear definition between this edge and the northern edge of the North East Leicester urban extension.</p> <p>2.31. Overall, it is accepted that this site falls wholly within the proposed Area of Local Separation, and that designation has a sound basis in landscape terms. However, we are strongly of the opinion that these designations are not used to restrict development. We have explained that we consider a more ambitious approach to housing growth is required if the Council is to meet local demand and it is important that a pragmatic approach should be taken, weighing the benefits of each potential allocation against any harm and how that harm can be mitigated.</p> <p>2.32. Given the above, the EDP LVIA offers a comprehensive appraisal of this site, the landscape in which it sits and how the allocation of PSH69 could be designed to improve that landscape given the hard urban edge of Syston identified above.</p> <p>2.33. The Charnwood Landscape Character Assessment confirms the site lies within the “Wreake Valley” landscape character area (LCA) and adjacent to the High Leicestershire LCA, which extends south and east of the site. The key characteristics of the Wreake Valley LCA that can be seen in the context of this site are:</p> <ul style="list-style-type: none"> · A flat bottomed river valley with gently sloping sides · Syston is a urbanising influence · An area of mixed arable and pasture farming 	

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	<ul style="list-style-type: none"> · Settlements are located on valley slopes. <p>2.34. The Wreake Valley LCA propose a strategy of conserving and enhancing the landscape, with the following guidelines particularly relevant:</p> <ul style="list-style-type: none"> · New development should preserve the open character of the valley and views across it · Enhancement through increasing tree cover · Seek opportunities for natural water management storage within the floodplain · Create new habitats – wetland habitats, riverside trees and hedgerows <p>2.35. The Council also has a Charnwood Landscape Capacity and Sensitive Appraisal. The majority of the site forms the northern part of Zone 29 in this Appraisal. The Appraisal reads, “[Zone 29] is considered to have Medium capacity to accommodate development. This is due to its openness to public view, lack of vegetation cover and the need to avoid coalescence. It is however a simple landscape in moderate condition, and the western and northern areas have close associations with the existing urban edge. Development could be appropriate on the lower land adjacent to the urban edge, subject to mitigation measures.” It should be noted that this Appraisal pre-dates the North Leicester SUE.</p> <p>2.36. The northeastern part of the site falls within Zone 22, which the Appraisal indicates has a “medium high” capacity for development.</p> <p>2.37. Using this appraisal as a base, the LVIA continues to consider this site in more detail and concludes that it has the potential to accommodate development that respects the Area of Local Separation discussed above. At Paragraph 3.38, the LVIA states, “...there is no reason to conclude that the site has any elevated landscape value or importance above the rest of the Wreake Valley LCA. Furthermore, there is no evidence to suggest that the local community place special weight on the site, meaning overall the site is considered to be of no more than local value.”</p> <p>2.38. The LVIA continues on at Section 4 to demonstrate the visibility of the site from a number of local viewpoints. From the north, the existing built form of Syston limits views of the site to the south. From the east, the rising topography and existing woodland limits views to within 500 metres of the site. The distance the site can be seen from increases to the northeast. From the west, views are blocked by existing planting along the railway corridor. Thus, it is from the south that the site is most prominent due to the open nature of the landscape.</p> <p>2.39. Given the above, the LVIA continues to propose a range of landscape mitigation measures that reflect the value of the site to the local and wider landscape and also from where built development would be most prominent. The main measures, proposed at Section 6 of the LVIA, can be summarised thus:</p>	

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	<ul style="list-style-type: none"> · Retention of existing landscape features · Significant replacement and new planting to compensate for any loss of trees and hedgerows · Creation of substantial open green space that links to existing open space to the north and the proposed open space associated with the North Leicester SUE · Provision of natural green space that incorporates SuDS features and provides new wetland habitats · Provision of pathways to increase public access linkages between Syston, the SUE and the wider countryside · Substantial new tree planting and strengthening of existing hedgerow boundaries to provide a green edge to the development · Retain a sense of openness and incorporate new public views across the valley <p>2.40. Overall, it is clear that, through the careful design of the proposals, the allocation of this site can offer substantial landscape advantages that would comfortably outweigh any nominal harm caused by the fact it falls within a proposed extension to the ALS-L.</p> <p>Settlement Hierarchy and Settlement Limits to Development Assessments</p> <p>2.41. The consultation is supported by a new Settlement Hierarchy Assessment that takes into consideration the services and facilities within each settlement and also considers the relationship each settlement has with the urban centres of Leicester and Loughborough. We support this comprehensive approach to the Settlement Hierarchy that recognises the importance of Leicester in particular in understanding where the most sustainable and suitable locations for new housing and employment growth should be located.</p> <p>2.42. We are satisfied that the assessment is based on a sound methodology that draws on a comprehensive range of data and evidence, including the 2011 Census and the Leicester and Leicestershire HEDNA. At the time of the 2011 Census, Syston was the third largest settlement in terms of population in the Borough, being second only to Loughborough and Shepshed, but larger than Birstall and Thurmaston. Syston, Birstall and Thurmaston also have the clear advantage of being largely already conjoined with Leicester.</p> <p>2.43. The Settlement Hierarchy states, “Loughborough, Shepshed, Syston and Birstall all have a population of 10,000 people or more and therefore fall within the government’s definition of an urban settlement (Rural Urban Classification, DCLG 2011). Thurmaston is very close to falling into this definition with a population of 9,668 people at the 2011 Census and estimated to exceed 10,000 before by the next census in 2021.”</p> <p>2.44. The HEDNA reveals that just over 50% of employed people who live in Syston either work in the town or commute to Leicester or Thurmaston. PSH69 is extremely well located in this regard, being on the southern side of Syston, close to Thurmaston and only a short walk from the local train station,</p>	

which allows easy and quick commuting into Leicester.

2.45. The Settlement Hierarchy Assessment outlines a number of essential and desirable facilities that are needed to meet people’s day to day needs, as follows:

Essential	Desirable
Food shop	Higher order services access
Primary school	Secondary school access
Employment access	Doctors surgery
High speed broadband	Range of recreation, leisure and community facilities
	Post office
	Pharmacy
	Pre-school care provision

2.46. As outlined in the Settlement Hierarchy, Syston scores extremely well when its facilities are assessed against the above criteria. The town can offer three food shops, two primary schools, two doctor’s surgeries, a post office, three pharmacies and a pre-school. It also has “excellent” access to employment and “very good” access to higher order services.

2.47. The Settlement Hierarchy confirms that Shepshed, Birstall, Thurmaston and Syston all rank as an “Urban Settlement” which is defined as, “A settlement that has a range and choice of services and facilities that meet the day to day needs of residents and physically or functionally forms part of a wider urban area.” It is clear that Syston deserves to be considered at least the equal of these settlements and this makes it an excellent location for new housing.

2.48. The strength of Syston as a location for new housing will only be increased once the A46 Expressway is implemented as that will bring further strategic transport links and employment growth into the town.

2.49. Within Syston itself, it is clear that site PSH69 enjoys extremely good access to the services and facilities that make the town one of the most sustainable locations for growth in the Borough. This site has the potential to offer land for community facilities such as a local centre or an expansion of the primary school site if required. The proximity to Syston train station has also been highlighted and this effectively links this site to Leicester in an extremely sustainable manner.

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	<p>2.50. Furthermore, easy pedestrian access to Melton Road is possible from the site. This means that, within a ten minute walk, a resident could get to two supermarkets, Central Park, the Post Office and many other retail stores. Therefore, the inherently sustainable location of this site is further borne out by its relationship with the key facilities of Syston that allow the Council to designate the town as an Urban Settlement.</p> <p>2.51. Charnwood Borough Council has used the current “limits to development” approach since the Local Plan was adopted in 2004. This approach was carried forward through the Core Strategy and has been used as the basis for determining planning applications. Whilst we accept that policies defining the limits of development (or settlement boundaries) are well established in planning, we consider that the proposed review is well overdue.</p> <p>2.52. The boundary review makes some relatively minor changes to Syston that reflect new developments that have been permitted. As before, the boundary is almost wholly defined by existing built form and therefore PSH69 lies wholly outside the proposed area.</p> <p>2.53. We acknowledge that settlement boundaries are a useful tool for defining where new development will be acceptable. We also accept that such boundaries need to be well-related to built form to provide clarity over how the associated policy will be applied.</p> <p>2.54. However, it is clear that for Charnwood to meet its OAN, significant new allocations outside the proposed settlement boundaries will be needed, particularly in towns such as Syston. Thus, this representation is based on the assumption that allocations could be made outside the proposed settlement limits through the usual Local Plan process.</p> <p>2.55. At this stage, it is not clear how the new allocations in the Local Plan will interact with the new settlement limits. Clearly, it would make sense for those allocations on the edge of settlements to be included within the new settlement limits. In doing so, there is a need to be clear about which parts of allocated sites fall within the proposed amended settlement limits and which do not. For example, if PSH69 were allocated in the new Local Plan, we would propose that the limits should incorporate the entirety of the site and it would be for the development management process to hold detailed discussions on the land uses within the allocation site, in line with the Local Plan policy that makes the allocation itself. It will be important to retain this flexibility within the Local Plan to ensure that the relationship between new allocations and settlement limits does not inadvertently prevent the Borough achieving its OAN.</p> <p>2.56. This flexibility will also be important as we intend to review the potential of redefining the extent of the floodplain currently designated in the southern part of the site, in line with the Council’s previous considerations of our SHLAA submissions for this site.</p>	

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	<p>2.57. To summarise the above, we are supportive of the comprehensive approach taken to reviewing the Settlement Hierarchy and endorse its findings. However, we consider further work is needed to demonstrate how the reviews to the Settlement limits will not conflict with the overall need for the Local Plan 2036 to deliver large scale housing growth to meet its OAN.</p> <p>3. Response to issues raised within Chapter 3</p> <p>3.1. We note that Chapter 3 does not pose any specific questions on housing need and supply for respondent's to address. However, we feel that these are critical issues that the Council needs to think about more carefully than it has done to date.</p> <p>3.2. As noted in Paragraph 3.1 of the consultation document, national planning policy is clear that Local Plans should meet the objectively assessed need for homes and jobs in its area. The housing numbers for the Borough have been derived from the Leicester and Leicestershire HEDNA, which outlines an Objectively Assessed Need (OAN) for 24,850 homes for the period 2011-2036, at a rate of 994 homes a year. Of this requirement, the source of potentially up to around 8,000 homes remain unidentified with the remainder now built or committed through the Core Strategy and the granting of planning permissions. It is noted and supported that the consultation document accepts that not all of the existing commitments will be completed in full by 2036 and so additional sites are now needed to ensure flexibility and robustness in the housing strategy of the new Local Plan.</p> <p>3.3. However, we remain unconvinced that the OAN that the Council is working towards is accurate or sufficient. The consultation documents states, "The government expects to adopt a new standard methodology for calculating housing needs. Whilst the standard methodology has not yet been put in place, we do not expect the need for homes to change significantly."</p> <p>3.4. We would contest this assertion. As noted by the Home Builders Federation in their consultation response, when the Government's standard methodology applied, the annual requirement for Charnwood increases to 1,047 dwellings per annum. Across the 25 year plan period, this means the Council need to find land for a further 1,325 dwellings. This is not an inconsequential increase.</p> <p>3.5. Furthermore, the results of the standardised methodology are expected to be seen as a minimum starting point. Additional ambitions that a local authority may have around economic growth and affordable housing would need to be met in addition to the standardised methodology result. Crucially, the HEDNA indicates that Charnwood would need to build at a rate of 1,280 dwellings a year to ensure that it delivers sufficient affordable housing to meet local need. On top of that is the Leicester and Leicestershire Growth Strategy referenced elsewhere in this document.</p> <p>3.6. This regional growth strategy is seeking to unlock further development potential in the area, with the A46 Expressway growth corridor passing through Charnwood. Again, this economic driven growth will generate the need for further housing over and above the current target against which the Local Plan</p>	

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	<p>2036 is being progressed, albeit it some of that need will be triggered beyond the plan period.</p> <p>3.7. The consultation document does not talk in any specific terms about cross-boundary working. Fulfilling the duty to cooperate is a key part of preparing any Local Plan. Charnwood will have to play its role in ensuring that the full OAN across all Leicestershire housing authorities are met. The consultation draft of Leicester and Leicestershire Growth Plan outlined that Leicester City will struggle to meet its OAN within its own boundaries and will need to push some of that housing into its neighbouring boroughs, of which Charnwood is one. We understand there has been a delay in issuing a Memorandum of Understanding that would outline how this unmet need will be met.</p> <p>3.8. Overall, we consider that it is quite clear that there is a realistic chance that the OAN that the Council are currently working towards will not supply sufficient housing for local demand and a more ambitious housing target is needed. Furthermore, the OAN that the Plan does work towards should include any unmet need from Leicester City.</p> <p>3.9. We would also highlight that the Council's approach to delivering housing in the current plan period is heavily dependent on three large-scale strategic urban extensions. This includes the North East Leicester SUE which is already falling behind its anticipated delivery trajectory and so is unlikely to meet expectations within the Plan period. We would question whether sufficient flexibility is being allowed for when the Council indicates that only just over 8,000 homes need to be accounted for.</p> <p>3.10. The delays in delivering the North East Leicester SUE means that the Council will need to carefully consider the appropriate lapse rate that needs to be accounted for when confirming the total capacity of its allocations. We consider a lapse rate of 15-20% should be applied to allow for those planning permissions that, for a variety of reasons, will not be completed as the Council predicts.</p> <p>3.11. This lapse rate is quite reasonable, being supported by DCLG research. Within the November 2016 study by Nathaniel Lichfield and partners "Start to Finish: How quickly do large scale housing sites deliver" it is acknowledged that planning permissions could lapse for a number of reasons including land assembly issues, delays in discharging pre-commencement conditions and, as with the North East Leicester SUE, an unduly onerous Section 106 requirement rendering a proposal unviable.</p> <p>3.12. Within the same study (page 12) it was noted that the DCLG had identified (as part of a presentation to the HBF Planning Conference in September 2015) a 30- 40% gap between planning permissions being granted for housing and housing starts on site. Further, it was noted that the DCLG analysis suggested that 10 - 20% of permissions do not materialise into a start date on site at all and in addition 15-20% of permissions are re - engineered through a fresh application which will not only push back delivery but also potentially alter the number and type of dwellings permitted.</p> <p>3.13. It is not clear whether, at this stage, if the Borough Council is making sufficient allowance for lapse</p>	

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	<p>rates in its deliberations on the total amount of allocations it will need to make in the Local Plan 2036 to ensure the spatial strategy is suitably robust.</p> <p>3.14. The highly sustainable location enjoyed by Site PSH69 has been highlighted elsewhere in this response and it is clear that this site has the ability to make a meaningful contribution to whatever OAN the Council seeks to meet through the new Local Plan. Furthermore, the site is available and will be deliverable early in the Plan period.</p> <p>3.15. However, it should also be noted that this site could play an important role in helping Charnwood meet its agreed share of Leicester City's unmet need. The amount of commuting from Syston to Leicester has been discussed elsewhere in this document and the interrelationship between the two settlements is clear. This site, as referenced above is extremely well located for access to Syston train station, which connects with Leicester train station with only a 10 minute journey time.</p> <p>3.16. Given the above concerns in response to the Council's approach to determining the level of development it needs to accommodate, we would strongly commend this site to the Council as a "quick win" that will make a meaningful contribution to local housing requirements early in the Plan period.</p> <p>4. Responses to questions raised within Chapter 4 What are the reasonable Development Strategy Options</p> <p>4.1. The consultation document summarises seven main growth scenarios that could be followed to help the Council achieve its housing and employment requirements for the Plan period. It is acknowledged that a combination of these options will ultimately be needed to achieve the overall target.</p> <p>4.2. The seven scenarios can be summarised thus:</p> <ul style="list-style-type: none"> · Leicester and Loughborough Urban Areas – Focus development on the Leicester Urban Area and the Loughborough Urban Area · Leicester and Loughborough Urban Areas and Service Centres – As above, with a smaller proportion of development at Service Centres (Anstey, Barrow Upon Soar, Mountsorrel, Quorn, Rothley and Sileby) · Settlement Hierarchy Distribution – As above, with a remainder of development directed to the Other settlements · Proportionate Distribution – All settlements to accommodate growth on a proportionate basis based on the population of each · Leicester and Loughborough Urban Areas and New Settlements – Four new settlements have been promoted to the Council that could combine with the two Urban Areas · Leicester and Loughborough Urban Areas, Services Centres and New Settlements 	

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	<p data-bbox="376 113 645 140">· New Settlements</p> <p data-bbox="376 181 1720 480">4.3. As a starting point, we strongly welcome the fact that six of the seven growth scenarios would incorporate new development at Syston. As this response has demonstrated, Syston is one of the most sustainable locations for new development at Charnwood and it is almost inconceivable that the Council will be able to meet its OAN without providing new housing at Syston. Furthermore, throughout this response, we have demonstrated that site PSH69 is extremely well located to provide a meaningful contribution to the housing requirements of Charnwood early on in the Plan period. Regardless of the growth strategy ultimately chosen, ensuring that sites such as PSH69 that can deliver early on in the Plan period are chosen will be critical in allowing the Council to retain a five year supply of housing land and accordingly retain control of the chosen growth strategy.</p> <p data-bbox="376 520 1688 719">4.4. The consultation document asks whether there are other “reasonable” options that should be considered by the Council. We consider there is another option that should be considered carefully, which would be to align the growth of the Local Plan with the Leicester and Leicestershire Growth Strategy. This Strategy represents a significant change in approach as it seeks to focus large-scale housing developments at strategic locations linked to the employment and infrastructure growth being promoted for the area.</p> <p data-bbox="376 759 1715 922">4.5. As discussed in this document, the A46 Expressway growth corridor passes through Charnwood, with its northern terminus likely to be at Syston (based on the consultation draft of the Growth Strategy). There is a clear opportunity for Charnwood to consider an additional growth scenario that focusses development on the new transport corridor and employment areas so that homes and jobs are located in close proximity.</p> <p data-bbox="376 962 1720 1161">4.6. The consultation document continues to ask about what the right mix of site sizes will be to facilitate delivery, whilst also supporting the provision of infrastructure. This question also has a common link with the consultation draft of the Leicester and Leicestershire Growth Strategy. That document states, “To date, the majority of new housing...has been built on small and medium-sized sites in the City, market towns, villages and rural areas...Often these developments make little or no contribution to infrastructure or services and, instead, rely on existing facilities. This has created significant problems.”</p> <p data-bbox="376 1201 1720 1294">4.7. As a consequence of this, the draft strategy proposes to focus, post 2031, on more development in “major strategic locations” that will, “allow us to plan for new housing and employment together with new and improved roads, public transport, schools, health services, local shops and open space.”</p> <p data-bbox="376 1334 1688 1463">4.8. Ensuring that new housing growth is supported by adequate infrastructure is a critical part of any Local Plan growth strategy and the evidence underpinning the Growth Strategy would suggest that recent Local Plans in the Leicestershire area have not delivered infrastructure alongside new housing growth. By switching focus to large scale allocations that will deliver infrastructure alongside the</p>	

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	<p>housing and employment land, the Council would ensure a comprehensively planned approach to development that focusses on strategic urban extensions in sustainable locations.</p> <p>4.9. Site PSH69 would be an excellent example of how the focus on strategic development could ensure that the necessary infrastructure is delivered alongside significant housing growth. The land holding in totality would be of a sufficient size that it would be able to provide land for community facilities for the benefit of Syston as a whole. This could include an extension to the primary school site immediately adjacent to our clients site should there be a capacity issue or alternatively the land could be used for a district centre with associated shops, meeting place or treatment rooms.</p> <p>4.10. It is clear that there is a strong economic case for focussing strategic levels of housing growth along the A46 Expressway corridor. Syston will enjoy a strategically important location at the northern terminus of the Expressway and appears an obvious location for further expansion to meet the housing that is planned up to 2050.</p> <p>4.11. We understand that one of the “problems” that the previous reliance on small and medium scale sites has been the associated impact on traffic congestion. Accordingly, this representation is accompanied by a Transport and Highways Summary Note, attached as Appendix 3, that considers the potential benefits of allocating site PSH69 for housing.</p> <p>4.12. This Summary Note highlights the various walking routes from the site towards the facilities of Syston. It confirms that continuous footpaths exist from the proposed entrances to the site to these facilities, which, as highlighted, are all within a reasonable walking distance. The Note also highlights the excellent bus services available in Syston that, in particular, provide services to Leicester and Melton Mowbray at least 20 minute frequencies.</p> <p>4.13. A review of local travel patterns shows the majority of existing residents are employed within areas of Charnwood and Leicester. A high proportion of local work related trips (88% within Syston) are made on foot and residents make use of the existing frequent bus and rail services to and from Leicester/ Nottingham.</p> <p>4.14. Overall, the Note is clear that this site is extremely well located in terms of sustainable travel to ensure that the previous issues of new housing exacerbating existing traffic congestion problems discussed above can be avoided through allocating PSH69 for residential development.</p> <p>4.15. Turning to the seven growth scenarios, we welcome the fact that the Council recognise that there is no single solution to delivering the high level of housing and employment growth that will be needed in the Borough up to 2036. As referenced above, we strongly support the fact that six of the seven growth scenarios propose new housing in Syston.</p>	

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	<p>4.16. The potential of Syston to accommodate significant levels of new housing growth has been outlined in detail in this response. However, it is also important to consider where in Syston that housing could be located. The current flood mapping indicates that Flood Zones 2 and 3 wrap tightly around the built limits of the town to its west and north. By contrast, for this site, the Council has identified in its most recent SHLAA that its Strategic Flood Risk Assessment (SFRA) indicates that more of the site may lie outside of the flood plain and thus be available for development than previously thought. Further modelling of the channel in question will be done to demonstrate the extent of the flood plain for this site and how much of the site is suitable for development. It is entirely possible the developable area will increase, further boosting the credentials of this site as a new allocation in the Local Plan.</p> <p>4.17. The town has already extended quite substantially in a northeastern and eastern direction and so further allocations on this edge of the town would be at least 10, if not 15 minutes' walk from the key facilities. As outlined elsewhere in this response, site PSH69 lies within 10 minutes' walk of nearly all of the key facilities offered in Syston. Therefore, it is clear that this site should be considered favourably as making a meaningful, and early, contribution to achieving six of the seven growth scenarios under consideration.</p> <p>4.18. Turning to the growth scenarios in more detail, we would strongly argue against Option 7, which is a single new settlement of at least 8,000 homes that will accommodate all of the housing need currently unidentified. However, the consultation document indicates that there is yet to be a site promoted that is large enough or available to provide such a settlement. The length of time that it takes to assemble the land and associated infrastructure to allow the building of new houses is also likely to make this option unviable, likely pushing the majority of housing completions outside the Plan period. Furthermore, the landscape impacts of an entire new settlement of this size are likely to be significant. Thus, we consider that Option 7 will have to be discounted early in the process.</p> <p>4.19. Therefore, the only realistic options for growth all include the provision of new housing at Syston. We consider that limiting development to just the Urban Areas is unlikely to provide sufficient land to meet the OAN of the district and so the best way to meet the OAN will be a combination of Options 2-5.</p> <p>5. Conclusions in respect of Site PSH69</p> <p>5.1. Overall, we consider that site PSH69 is an exceptionally well located site that should be allocated in the emerging Local Plan for Charnwood.</p> <p>5.2. This response has shown that Charnwood is experiencing a step change in the level of housing and employment that the Borough will need to deliver up to 2036. Thereafter, further ambitious plans for the period up to 2050 are already being drawn up as part of the Leicester and Leicestershire Growth Strategy. As we have explained, the current vision for Charnwood within the Core Strategy is no longer fit for purpose and needs to be amended to reflect the agenda for growth for which Charnwood will play a</p>	

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	<p>key role given its proximity to Leicester.</p> <p>5.3. As we have outlined, we have concerns that the housing target that the Council appear to be working to is not sufficient to meet the needs of the district looking forward to 2036 and beyond. We recommend that further work is undertaken to ascertain what the correct level of growth for the district is. This should include research on whether the current OAN would deliver sufficient levels of affordable housing, consideration of the fact that the Government's forthcoming standard methodology will increase numbers further and should be seen as a minimum regardless and finally that Charnwood will need to accommodate some of Leicester City's unmet housing need.</p> <p>5.4. Given this, we consider that Syston will have a key role in meeting the housing requirements of Charnwood Borough. The Council's own evidence shows that it is an increasingly sustainable location for new housing and its proximity to Leicester will be particularly pertinent given the above point about unmet need.</p> <p>5.5. Within Syston itself, this site's proximity to the facilities of the town is hugely important and is one of the key reasons why this site should be allocated. Furthermore, allocating this site will offer the opportunity to provide additional land for the benefit of the town as a whole, be that through allowing an expansion of the adjacent primary school or providing new community facilities to address the current needs of Syston's residents.</p> <p>5.6. As this response has explained, whilst the site will fall within an Area of Local Separation, this should not be seen as a reason to resist its allocation. When the wider landscape context is considered, including the currently unattractive urban edge of this part of Syston, the allocation of this site will allow for significant landscape benefits that will enhance the edge of the town and increase public access to the countryside.</p> <p>5.7. Therefore, we strongly recommend that the Council looks at the potential allocation of this site favourably and would be delighted to provide more information about the site, and enter into further discussions about it, if the Council consider it necessary.</p> <p>Further documents/information submitted with representation ref : TLP/113</p>	
TLP/114	<p>Firstly I should like to question why the HEDNA figures are being used when these were collated prior to the EU referendum. Is there any evidence to suggest that this level of new housing will be needed in a post-Brexit environment? The HEDNA states that anticipated growth of 28% in Charnwood is derived from ONS data and is based upon international migration being the significant driver of population trends in the borough. It is impossible to know the impact that Brexit will have on migration, but current indications are that net migration will fall, which could significantly reduce the number of houses needed. The HEDNA is also based upon the 2014 life expectancy projections, but, following higher than anticipated rates of mortality in 2015 and 2016, the most recent figures released in Dec 2017 show a</p>	<p>We note your comments on the population and migration assumptions in the Housing and Economic Development Needs Assessment, infrastructure and the environment.</p> <p>The responses to the</p>

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	<p>reduction in the life expectancy, particularly over the next 25 years. Would the HEDNA figures be considered as up-to-date by an inspector?</p> <p>Secondly, it impossible to understand how any more houses can be built in the borough without massive improvements to the road network and other infrastructure. Loughborough suffers from chronic congestion because the public transport system is, quite frankly, inadequate. The document 'Charnwood Borough housing delivery scenarios' published in December 2017 states that there are no significant projects planned locally in terms of cycling infrastructure or the bus network which means that the conditions are likely to become worse and make Loughborough an unattractive place to work or shop in.</p> <p>My greatest concern, however, is our beautiful landscape being covered in houses. How long will it be before the triangle between Leicester, Nottingham and Derby is completely filled with concrete?</p> <p>The Vision for Charnwood in 2036 I believe that the current 'Vision of Charnwood in 2028' should be extended to 2036. The vision to 2028 was implemented only three years ago following a decade of consultations and to make any radical changes so soon is unnecessary. Furthermore, the current vision is aligned with the draft Leicester and Leicestershire 2050 vision for growth.</p> <p>It is vital that our rural landscape, the rich and diverse ecology and our cultural heritage are protected and improved (the phrase 'in a good state' is rather weak and meaningless).</p> <p>The reduction of traffic and congestion on Charnwood's roads should be a priority in the vision, as should real alternatives to using the private car.</p> <p>My personal vision for Charnwood is one where you can hop on a bus to get to wherever you wish, people walk to the shops, cycling on quite pollution-free roads and being able to get from A to B without sitting in traffic for hours on end. It is also one where the countryside remains just that – countryside and not covered in housing.</p> <p>Settlement Hierarchy I agree with the settlement hierarchy list, although I am surprised that Anstey cannot meet the day- to-day needs of its residents and would class it as an urban settlement.</p> <p>In the Charnwood Settlements Hierarchy document, some of the 'counts' of facilities are a bit misleading, and in some cases wrong. For example formal indoor/outdoor sports facilities implies to most something such as a gym or swimming pool where there is an organised activity available for members of the public, whereas in reality there are many places counted as formal sports facilities where there no activities for general members of the public. One example is Towles field in Burton on</p>	<p>consultation will inform the Draft Local Plan which will be published for consultation</p>

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	<p>the Wolds which is used by football and cricket clubs from outside of the village but these are 'member only' clubs and there are no organisations providing sports for children or youths at all.</p> <p>Other settlements appear to have far less facilities recognised in fig. 10 of the Settlement Hierarchy Assessment than there are. Take Wymeswold, for example, it has two places of worship, a village hall, three pubs, playing fields and a Scout hut yet it only scores '2' in the 'range of recreational facilities column'. How inaccurate is the data in the rest of this document?</p> <p>Limits to development I agree with the principles used in redrawing the settlement boundaries and the removal of large gardens from the limits to development is welcomed.</p> <p>Key Issues and Evidence Most of the key issues are accompanied by the phrase 'needs to be understood'. Until these key issues are understood there seems little point in finalising a strategy. It is obvious, however, that the greatest limiting factor is congestion and unless it is ascertained why so many people drive to work, drive to take/collect children to and from school and drive to buy their morning paper this will not change.</p> <p>Transport As recognised, a large proportion of the trips people do are between home and work. It is vital, therefore, that homes are placed within walking distance of where people work or be accessible by a reliable, affordable and frequent public transport distance. Cycling networks should also be provided.</p> <p>The data from the 2011 census shows that 63.5% of people living in Charnwood drive to work compared with just 4.9% travelling by bus and 1.5% by train. (9.9% walk). It is clear that travelling by public transport is not currently an attractive mode for travelling to work and the reason for this needs to be investigated and a serious attempt to reduce the number of trips by car must be prioritised when considering where to site new development.</p> <p>Housing – mix of sizes, types and tenures The statement at 2.12 is too wishy washy. More specific details are needed to ensure an appropriate range of housing is provided. For example, a primary reason given for needing additional housing in the borough is to cater for our aging population yet there is no mention the need for bungalows. Why not? The decision William Davis Ltd & Ors v Charnwood Borough Council last November will have taught the council why it is important for this type of information to be embedded in the local plan rather than in supplementary documents. The HEDNA states that 'providing an element of bungalows should be given strong consideration on appropriate sites, allowing older households to downsize while freeing up family accommodation for younger households'. How will this be achieved? Where will retirement homes and sheltered accommodation be located?</p>	

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	<p>The need for infrastructure There would appear to be a conflict between the preferences where on one hand ‘infrastructure partners highlight that it is not always possible to increase capacity at existing accommodation’ whilst on the other the Clinical Commissioning Groups have ‘a preference for funding to improve existing practices’.</p> <p>As the Leicestershire Vision for 2050 points out smaller developments ‘make little or no contribution to infrastructure or services and, instead, rely on existing facilities. This has created significant problems. Some communities feel overwhelmed by the speed and scale of change. Others are disadvantaged by pressures on local schools, health centres and recreation facilities’.</p> <p>The following is an extract from a letter of an objection to a recent planning application in the Wolds area which I feel expresses the point that the county council is making in their strategy.</p> <p>Currently schools get a new classroom built on the playground, but the other accommodation within the school becomes over-burdened. I’m not sure how the NHS spend their allocation but quite clearly the vast majority of residents in this village feel that the surgery in Barrow has not been able to cope with the increased demand – and that is before the 300 Jelson homes in Melton Road have been built. If all the speculative applications within North Charnwood had been taken together, a new community leisure centre for all ages could have been built rather than a token contribution towards existing facilities with no guarantee of expansion or improvement.</p> <p>I would hope that larger developments will bring new schools, health services and recreational amenities; smaller proposals would only provide a formulaic donation towards such facilities. If it is decided to pursue an option which results in a number of smaller developments then it is vital that the infrastructure for the wider community is planned alongside these.</p> <p>Viability What does ‘planning obligations should not be so high that developers cannot afford to pay for them’ actually mean? Does it mean not so high that they would make a loss, or is it just that they wouldn’t make such huge profits as they would like? (Look at the balance sheets of major developers!) If developers continue to stall/refuse to contribute to the major infrastructure needed then Charnwood Borough Council should consider building homes suitable for the needs of our communities.</p> <p>The Charnwood Housing Delivery Scenarios Market Impact Assessment document concludes ‘we recommend that the Council considers viability separately and in more detail at a later stage in the plan-making process – particularly for those large sites that were not assessed as part of the 2014 viability study’. It is particularly important that this is done considering the current economic climate and uncertainty of the future.</p>	

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	<p>Ability to deliver What does 'the market cannot absorb them' mean in 2.42? Does it mean that developers cannot build them fast enough, or does it mean the homes are not needed so not sold?</p> <p>Employment strategy options Option 1 and Option 2 are both reasonable strategies, but whichever route is taken it is vital that employment zones are positioned alongside housing to reduce the need to travel by car – and they need to be easily accessible by bus and cycle routes.</p> <p>Option 3 – although I have read the Employment Land Review which suggested this option, I would argue that it is not appropriate to provide large warehousing given the close proximity of the East Midlands Gateway which would be more attractive to businesses. Although this is not in Charnwood, what is the point in allocating land 'just for the sake of it' as would appear to be the case. If it is concluded that a 10ha site for large warehousing should be provided it is vital that this is close to either the M1 or the new A46 expressway so that HGVs are not routed through settlements. It should also not be provided unless there is a proven need – which is unlikely considering the abundance of similar facilities at Mountpark Bardon.</p> <p>Housing Strategy Options I strongly believe that only the minimum number of houses should be planned for. Having read the Charnwood Delivery Evidence (delivery scenarios and market impact assessment) it is clear that the developers control the number of houses reaching the market and even if 50,000 homes were planned for, the build rate will be at whatever rate the developers consider appropriate to maximise profits rather than seeing it as their duty to provide the housing needed. The borough has already seen a slowdown in delivery since the two large developments at Thurmaston and Garendon were granted permission because the landowners and unscrupulous developers are greedy – knowing that if the delivery falls below the 5 year supply they can force through applications in unsustainable small village locations without needing to provide any infrastructure. Building work on these sites always seems to take priority over those that are in the local plan.</p> <p>A further argument would be that, there are only a certain number of developers in the region and on past evidence they are not capable of building houses at the rate in the region of circa 1,400 per annum required to clear the backlog (housing delivery study appendix F). Or is it that, in reality, they do not want to build at this rate because it would decrease house prices and their profits?</p> <p>A third case scenario is that there is simply not the demand for further housing and that the reduction in build rate is justified.</p> <p>Does it matter if there is no flexibility in the supply of land? We already have the situation where developers are deliberately slowing the build rate to create 'less than five year housing supply' in order</p>	

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	<p>to get access to the more profitable ‘desirable village’ location plots. There is not a village in Charnwood that has been spared this unscrupulous approach. The threat of the revised plan becoming out of date if the circumstances change is irrelevant – provided that regular reviews such as this one are made, there will be sufficient time to adjust. The greatest danger is if developers continue to behave as they are.</p> <p>I believe that it is more important to protect our green and pleasant land for our children and future generations than to cover it in an endless number of brick boxes.</p> <p>Option 1 The Charnwood Settlement Hierarchy assessment shows that, of the economically active people in the borough 20% work in Leicester and 25% in Loughborough. In fact, Loughborough has 50% of the jobs available in the borough. In addition, the most popular destinations for comparison shopping are Leicester and Loughborough. The bulk of food shopping is done in South Loughborough, Syston and Thurmaston. It makes sense, therefore, to continue with a strategy of focussing housing around these areas.</p> <p>Furthermore, 26% of residents commute outside the borough for work, with 13% travelling to Leicester and 7% into NW Leicester. To reduce levels of commuting housing developments should be sited close to these locations and within close proximity to the new A46 expressway and the East Midlands Gateway.</p> <p>Option 2 The service centres have already taken a large amount of new housing within the current plan period over and above the original planned amount with the consequence that services in these locations are now at bursting point. This option would only be appropriate in a higher growth scenario but the cumulative impact of development must be considered. There have been a number of developments in the range of 50 – 300 homes in the Barrow upon Soar area which, taken together, would have meant a new primary school and doctor’s surgery could have been provided, but the ‘drop by drop’ approach has meant that the existing facilities are now inadequate for the population they serve.</p> <p>Option 3 In the past 10 years ‘Other settlements’ have suffered a large amount of unplanned development. These locations have generally been assessed as unsuitable for development and they remain so. The consequence of building in the rural settlements has added to the congestion on the roads because most do not have a usable bus service.</p> <p>2.3 states that the Charnwood Local Plan will take account of the Strategic Growth Plan. The Strategic Growth Plan states that ‘in recent years, our villages and rural areas have been under intense pressure for growth. The draft strategy proposes that, in future, there will be limited growth in these areas,</p>	

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	<p>consistent with providing for local needs'</p> <p>This Leicestershire-wide draft strategy proposes to focus development along transportation corridors and close to important employment centres. It proposes to build more development in major strategic locations and to reduce the amount that takes place in existing towns, villages and rural areas. This will allow us to plan for new housing and employment together with new and improved roads, public transport, schools, health services.</p> <p>Option 3 would be contrary to that strategy.</p> <p>Option 4 This option may seem 'fair' but where will the infrastructure come from? The comments under option 3 apply to this option.</p> <p>Option 5 This option has been poorly presented. The four large sites in question should have been listed under this option rather than hidden elsewhere in the document. In addition 'Near Wymeswold' is extremely misleading because, in fact, the proposal is for the land at Hoton, several miles from Wymeswold.</p> <p>Each new settlement would need to be taken on a case by case basis – it would be inappropriate to include all four locations within the local plan as this implies that they are suitable for development. Largescale development at Cotes has already been rejected once and has many problems associated with it – not least because it would be destroying the setting of a scheduled ancient monument.</p> <p>I am not against the principle of creating new settlements provided that adequate infrastructure was provided. It is not clear that this would be the case though given the preferences of the Clinical Commissioning Group. (1,000 homes at Cotes, 770 in Hoton on top of the 300 with planning permission in Barrow upon Soar means and extra 2,000 households wanting to use the surgery in Barrow – exactly how are they going to expand on that site?)</p> <p>The 2011 Census showed that 13% of those living in the Wolds villages travelled to Nottingham, Derby Melton or North West Leicestershire to work and a large number shop in Nottingham. Creating new settlements in the Wolds at Cotes and Hoton would not necessarily be of benefit to the borough if the residents are working and spending their money in adjacent boroughs.</p> <p>The new settlement locations are all set in the countryside and, in the case of Cotes Hotona and Barkby adjacent to hamlets or a very small village and away from any major road networks. It is unclear why these are considered to have less environmental impact.</p> <p>The viability assessment has assumed that the transport infrastructure capacity for a development at</p>	

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	<p>Cotes is currently good – how bizarre. Clearly the authors have never been to Cotes in the morning rush hour, tried to catch a bus in the evenings or had to walk back from the station in the dark.</p> <p>The viability of a development at Hoton appears to rely on an employment park at Cotes.</p> <p>Option 6 The comments under option 2 and option 5 are relevant to this option.</p> <p>Option 7 As there is currently no site available for a single standalone new settlement this is not a viable option. As to whether or not it should be considered as part of a longer term strategy would depend on whether or not there is actually any suitable land left to build on by 2036; a settlement of 8 – 10,000 homes would be about 1½ times the size of Shepshed and require an enormous expanse of land and major roads. The only places where there is that area of land currently undeveloped are all in the National Forest, undulating countryside or flood plains. It simply is not practical and at some stage it has to be accepted that Charnwood has exceeded capacity and, like the City of Leicester, has no more developable land. I.e. it is full!</p> <p>I believe that this option is misleading as there are some that may think that the title refers to the new settlements listed in Appendix D.</p> <p>In answer to the question ‘What evidence do you think the council needs in order to identify its development strategy? I would day that it needs new evidence to support the number of homes required over the plan period in a post Brexit environment.</p> <p>The forecast figures suggest that there will be an increase in population of **** over the plan period. Some of this will be due to older people living longer, but the rest will be due to migration into Charnwood. Why is it that Charnwood’s population rise is predicted to be so much greater than the other borough’s in Leicestershire? Where are these people coming from and what is bringing them here?</p> <p>Towards a sustainable environment I also believe that the minimum number of houses should be built to minimise the already catastrophic effect that development is having on the environment. All of the options put forward will have a negative effect on the historic environment, biodiversity, water quality, air quality and flood risk, particularly in the higher growth scenarios. This all indicates that only the lower growth should be planned for.</p> <p>Brownfield sites should be prioritised in all options. Continual intrusion into the countryside is destroying the ecological networks and corridors for all species of wildlife – not just those that are currently protected by law.</p>	

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	<p>Policies for protecting the environment in the local plan must be much clearer, and the full impact of development upon the environment taken seriously.</p> <p>Housing delivery study Whilst the Housing Delivery Study (Charnwood Borough housing delivery scenarios Dec 2017) is not part of the consultation, it is a document that has been used to shape the local plan revisions and I have two comments on the contents of this document:</p> <p>Why are Burton on the Wolds and Walton on the Wolds considered as 'Prime Charnwood' with a notional housing needs of 119 per annum based upon current households but Wymewold, a village with more facilities a population greater in size than the former two villages added together classes as 'North East Rural' with a notional housing needs of just 27? Furthermore, the study goes on to conclude in Fig. 10 that 'in future, housing demand may increase as a result of transport improvements in the local area, and be sustained by new employment opportunities in the local area'. As far as I am aware, there are no planned transport improvements in this area, nor any new employment opportunities. The current bus service is poor (not moderate as 'assumed' in the document). The classification of 'Very High' reflects the currently high residential sales value in the area and does, therefore, indicate that these are not suitable locations for development if the general need borough wide is for lower cost housing.</p> <p>Further points on infrastructure The following are all examples of how overburdened facilities have become in our village. I am sure that there are a number of similar problems in other settlements.</p> <p>My village 'ticks the box' in the sustainability appraisal for having a village hall – but that was built over 100 years ago when the population was just 300. The population is now over 1,200 and I can recall one meeting (hosted by the parish council on planning matters) where residents were turned away because the hall had reached capacity. Small-scale development in the village will not provide a new village hall.</p> <p>Similarly the village primary school was built in 1966 and was designed for 100 children. There are now 165 children on the roll. In 2006 a temporary mobile classroom was installed on the sports field in 2006 to accommodate the extra children from a 60 house development in the village. Twelve years on and it is still there. This was, however, insufficient to cater for the influx of children resulting from development in nearby Barrow upon Soar and two additional classrooms have been added which caused the loss of a large area of the playground, including a netball court.</p> <p>This may have provided sufficient accommodation in the classroom but the communal facilities have not been expanded. The school hall was only designed for 100 children and now that the number of children has increased by more than 150% it is no longer possible for all children to dine at lunchtime in one sitting. Those having a packed lunch eat in the classrooms! When all the children and staff at the school have assembly there are about 185 people in the school hall. The health and safety capacity of</p>	

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	<p>the school hall is 200 so if any extra children join the school there is the danger that this capacity would be exceeded during assemblies, particularly if there are visitors in school, as there frequently are. There has been at least one incident reported to me where children were turned away from a performance in the hall because it was full – as a consequence not all of the children were able to perform in front of their friends – and the children missed an opportunity to be inspired by their peers. This appalling situation is the direct result of poorly planned infrastructure.</p> <p>Further comments on transport</p> <p>Only 1.5% of travel to work is done by train; this is unlikely to alter until the cost of rail transport is significantly reduced. For the four mile journey into Loughborough from Burton on the Wolds it now costs £5.50 for an adult return and £4.10 for a child. As a parent of four children living in Burton on the Wolds I am faced with the following transport issues:</p> <ul style="list-style-type: none"> • To catch the bus into Loughborough is costly. Although on a Saturday we could purchase a ‘Tango’ ticket, these are only available if two adults travel together so for myself and the children the cost is a massive £21.90 – for a journey of just 4 miles!! Some kind drivers would treat my eldest as an adult, enabling two children to travel free, reducing the price to £12.35 – but still more than the cost of school dinners for a whole week and almost three times the amount it would cost to drive into Loughborough and park in the Granby Street car park. It does not make economic sense to catch the bus when it is cheaper to travel by taxi. • The last bus into Loughborough is at 18.16 and from Loughborough at 18.32. There is no Sunday service. It is not possible, therefore to use the bus for any evening activities such as swimming club and Sunday rugby training. • There are no clubs for children and young people in Burton on the Wolds. The nearest Guide and Scout troops are in Wymeswold, sports clubs are either in East Leake, Barrow upon Soar or Loughborough, church youth activities are in Wymeswold or Barrow and orchestras in Loughborough. It is, therefore, necessary for me to drive my children to any of the normal activities that children participate in. <p>My youngest daughter catches the 7.58 no.8 bus to school. It is frequently late, often standing room only and sometimes just stops to say “sorry, we are full”. The next bus is not until 9.20 – over an hour and twenty minutes later!</p> <ul style="list-style-type: none"> • My husband works in Leicester. The 7.58 bus service cannot be guaranteed to arrive in Loughborough in time to catch the 8.21 train to Leicester (the latest train that would get him to work on time). To get to Leicester for a 9 o’clock start would mean catching the 7.13 bus from Burton on the Wolds to connect with at train a cost of £12.50 return (£5.50 bus, £7.00 train). Alternatively, he can leave at 8.15 p.m. and drive straight to his office for a cost of about £5.00, no waiting at a cold bus stop or freezing train station and having an extra hour to spend with his family at breakfast time. It is not surprising that he drives into Leicester to work. • One of my children studies at a college which is a 10 minute walk from the train station in Leicester, but like my husband she would need to leave the house at 7 a.m. to be in lessons by 9 o’clock. Many 	

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	<p>days she gets a lift in with my husband, but when he has meetings further afield I have to drive her to the station. Returning on the 4.30 train, she has a 50 minute wait for a bus at Loughborough Station. Consequently, I get in the car to go and pick her up too.</p> <ul style="list-style-type: none"> • Our doctor's surgery is in East Leake, there is no public transport from Burton on the Wolds to East Leake. Transferring to the surgery in Barrow upon Soar would have a similar problem. • Taking my children to the Queen's Medical Centre for appointments requires a change of bus in Hoton and Nottingham city centre and I would have to set off the day before for some early morning appointments. <p>The reality is, very few people living in Burton on the Wolds catch the bus. My children are one of those few, so we know at first hand some of the problems there are. As outlined above these include:</p> <ul style="list-style-type: none"> . It is costly . It is unreliable . It does not run in the evenings . There is no service on a Sunday . Onward connections are difficult . It does not go to the where the medical services are . At peak times it can be standing room only . Sometimes it is too full to pick up passengers at Springfield Close . Occasionally when the driver is late he misses out Hoton (for onward travel to Nottingham) <p>The consequence of living in a village like Burton on the Wolds is that anyone without a car is isolated. In the 2011 Census only 5% of households in the Wolds were without a car compared with 41% in the Loughborough Hastings Ward. This high level of car ownership is because it is necessary to travel for work, leisure and social activities by car.</p> <p>The above situation will apply to many rural locations and the lack of adequate public transport means that any large scale development would fail the requirement in Para 34 of the NPPF whereby development should be in locations where the need to travel will be minimised and the use of sustainable modes of transport can be maximised.</p> <p>Congestion</p> <p>We had a new car in January which has been primarily used to travel from Burton on the Wolds into Leicester for work and into Loughborough to the shops. In the first five months we have travelled 7,000 miles at an average of just 20 mph. That equates to 750 hours driving or over six days per month sat in the car – and in reality over an hour a day sat in stationary traffic. There can be no more development unless something is done to reduce congestion.</p> <p>Further documents/information submitted with representation ref : TLP/114</p>	

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<p>TLP/115 Melton Borough Council</p>	<p>Please treat this as a consultation response from Melton Borough Council to the 'Towards a Local Plan for Charnwood Consultation' closing on 07/06/2018 at 5pm.</p> <p>Melton Borough Council recognises that only limited information is available at this very early stage of Local Plan preparation. However, there are a two points the Council would like to comment on:</p> <p>1) The Council would expect the housing numbers that eventually appear in the draft Charnwood Local Plan to reflect the Objectively Assessed Need for Housing, as reflected in any update to the Leicester and Leicestershire Joint Statement of Co-operation relating to the Objectively Assessed Need for Housing, and any housing numbers finalised in the emerging Strategic Growth Plan.</p> <p>2) The level of growth proposed by most of the options in the Birstall and Syston areas will increase the level of traffic on the A607 and A46, key routes for traffic coming from Melton Borough to Leicester. The Strategic Growth Plan proposes an A46 expressway to alleviate traffic problems arising from the development of the area. However, taking into account that the Strategic Growth Plan goes beyond 2036, it would be beneficial to match the delivery times of both infrastructure and housing and employment, to avoid major and unnecessarily prolonged traffic congestion in the area. The Council requests that any transport modelling that is undertaken to understand the impact of traffic arising from the new development proposed in this area through the emerging Charnwood Local Plan include consideration of impacts and any mitigations that might be necessary beyond the CBC boundary, and that the results of the modelling are shared with the Council.</p>	<p>We note your comments on housing need, the Strategic Growth Plan and traffic impacts. The Council will continue to work with the other Leicester and Leicestershire Housing Market Area authorities under the duty to cooperate.</p> <p>The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be accompanied by an appropriate range of evidence, and supporting documents including transport modelling. We welcome ongoing cooperation in developing our policies.</p>
<p>TLP/116 Savills on behalf of Trustees of The Grace Dieu and Longliffe Estates</p>	<p>Savills (UK) Ltd are instructed by our clients the Trustees of The Grace Dieu and Longliffe Estates to submit representations in response to the current consultation 'Towards a Local Plan for Charnwood' discussion paper.</p> <p>The Site - PSH 291 'Land at Tickow Lane, Shepshed'</p> <p>Savills has previously promoted the site referenced PSH 291 'Land at Tickow Lane, Shepshed' (informally referred to as Watery Lane, Shepshed) for residential allocation. As part of these representations we reiterate that residential development at this site is considered to be suitable, available and achievable in the short term (Years 1-5).</p> <p>Savills is instructed by our clients to prepare and submit an outline application for up to 300 new homes at this site. In July 2017 we sought pre-application advice from Planning Officers (LPA Ref: P/17/0982/2). The response received dated 61" July 2017 confirmed at that time the Council could demonstrate a five year housing land supply but recommended that we continue to promote the site for allocation within the emerging Local Plan.</p> <p>In March 2018 Charnwood Council confirmed that the application for up to 300 dwellings would not need to be accompanied by an Environmental Statement (LPA Ref: P/18/0460/2).</p> <p>Most recently have arranged a public exhibition of the proposals for the site to be held on Tuesday 12th</p>	<p>We note your comments in relation to land at Tickow Lane, Shepshed on the settlement hierarchy, housing need and development strategy options. No decisions have been made at this stage about the preferred approach and the individual sites which would deliver the approach. The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p> <p>We also note the additional information provided. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having</p>

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	<p>June 2018, between 3:30pm & 7:30pm at the Chamwood Road Community Centre, Shepshed, LE12 9QE.</p> <p>I have enclosed for your reference the 'Pre-Application Document' (May 2017) which provides some technical background to the site and the initial concept masterplan. Work is currently underway to prepare the application documentation and we are working towards submission later this summer 2018.</p> <p>Response to 'Towards a Local Plan for Charnwood' Discussion Paper</p> <ul style="list-style-type: none"> • 2.34 - Settlement Hierarchy In respect of Shepshed support is given to its identification of the town as an 'Urban Settlement', a second tier settlement within the settlement hierarchy as stated at Table 1 of the discussion paper. Paragraph 2.31 recognises that Shepshed benefits from a full range of services and facilities that meet day to day needs as well as excellent transport links and a close relationship with Loughborough or Leicester. There is a choice of services e.g. a range of food stores to choose from and a range of employment opportunities. <p>We request Charnwood Borough Council allocates PSH 291 'Land at Tickow Lane, Shepshed' for residential development. We consider development of this site to be a logical extension to the north western boundary of the Town. The settlement boundaries within the emerging Local Plan should reflect development at this site.</p> <ul style="list-style-type: none"> • Chapter 3 - Housing Need As acknowledged within the Discussion Paper, the Government has recently consulted upon a number of possible changes to Planning Policy. A key consideration for the preparation of the emerging Charnwood Local Plan will be the policy endorsed approach for the identification of housing need. The recent consultation suggested a move towards a standardised methodology. We anticipate that the Government will publish its new policy in Summer 2018, this will confirm the requirements going forward. We recommend that Charnwood Council complies with the relevant policy and guidance. In addition it should plan to meet its needs within the emerging plan period. • Chapter 4 - Housing Strategy Options The Council has identified various options for growth within the emerging Local Plan. All of the following options would direct growth to Shepshed. <ul style="list-style-type: none"> • Option 1 - Leicester and Loughborough Urban Areas • Option 2 - Leicester and Loughborough Urban Areas and Service Centres • Option 3 - Settlement Hierarchy Distribution • Option 4 - Proportionate Distribution • Option 5 - Leicester and Loughborough Urban Areas and New Settlements • Option 6 - Leicester and Loughborough Urban Areas and Service Centres and New Settlements 	<p>regard to the full range of planning considerations.</p>

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	<p>We would specifically support options which would direct larger scale development to the larger more sustainable settlements, in particular to Shepshed (Options 1, 2, 3, 5 and 6).</p> <p>I would be grateful if you could please keep me up to date about the progress of the emerging Local Plan. If you require additional information to assist you with your assessment of this site please do not hesitate to contact me on the details provided.</p> <p>Further documents/information submitted with representation ref: TLP/116</p>	
<p>TLP/117 Pegasus on behalf of Strata Homes Ltd</p>	<p>1. INTRODUCTION</p> <p>1.1 These submissions have been prepared on behalf of Strata Homes Ltd who have interests in land to the rear of 62 Iveshead Road, Shepshed. Submissions have previously been made to the Council on the opportunity for sustainable growth in this location, including identifying the site in the Strategic Housing Land Availability Assessment as part of the development options in Shepshed (SHLAA ref: PSH322).</p> <p>2. VISION FOR CHARNWOOD IN 2036</p> <p>2.1 The Discussion Paper refers to the adopted Core Strategy which sets out the vision for Charnwood up to 2028. The Paper invites views on whether the current development strategy should be extended or whether something different should happen.</p> <p>2.2 The Charnwood Core Strategy Vision sets out an urban focused approach with development directed towards the towns of Loughborough and Shepshed after the edge of Leicester City. It is therefore considered that the overall vision set out in the Core Strategy, reflecting an urban focused approach to development recognising the important role to be played by the sustainable settlements, including Shepshed, is a generally appropriate vision to take forward over the period to 2036.</p> <p>2.3 We comment below on the settlement hierarchy and the identified reasonable development strategy options.</p> <p>3. SETTLEMENT HIERARCHY AND SETTLEMENT LIMITS TO DEVELOPMENT</p> <p>3.1 The Settlement Hierarchy contained within the Discussion Paper has been informed by a Settlement Hierarchy Assessment (2018). The assessment informs the proposed Settlement Hierarchy as set out in Table 1 to the Discussion Paper.</p> <p>3.2 The proposed settlement hierarchy largely reflects the hierarchy as set out in the adopted Core Strategy, with Shepshed defined as an ‘urban settlement’, which reinforces its status as the second largest settlement in the Borough. The settlement hierarchy is therefore fully supported and Shepshed’s status as ‘urban settlement’ reflects the wide range of services and facilities available in the settlement.</p>	<p>We note your comments in relation to land at land at the rear of 62 Iveshead Road, Shepshed on Vision for Charnwood, Areas of Local Separation and Green Wedges, the Settlement Hierarchy and Settlement Limits and the Housing Strategy Options. No decisions have been made at this stage about the preferred approach. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p>

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	<p>3.3 The Settlement Hierarchy recognises that Shepshed has a full range of services and facilities including a secondary school, a range of employment opportunities and a choice of services within the settlement. The Assessment notes that Shepshed has a strong relationship with Loughborough, with 27% of the economically active residents in Shepshed working in Loughborough. The very good transport connections are also referred to with excellent higher order services access and employment access. The summary refers to the 15 minute frequency bus service available between Leicester and Loughborough through Shepshed.</p> <p>3.4 Land to the rear of 62 Iveshead Road provides an opportunity to provide further development in a highly sustainable location to help meet future housing requirements.</p> <p>4. HOUSING STRATEGY OPTIONS Housing Strategy Options – Growth Scenarios</p> <p>4.1 In terms of housing need and supply, the Discussion Paper states that a minimum of 8,100 homes are needed to flexibly meet the needs in the Borough to 2036 over the commitments outlined in the adopted Core Strategy. This reflects evidence as set out in the Housing and Economic Development Needs Assessment. Paragraph 4.5 of the Discussion Paper indicates a greater supply of land, for up to 15,700 homes, would maximise the potential for maintaining housing supply by providing flexibility to take account of changing circumstances. We support this approach as this would provide necessary flexibility to take account of changing circumstances. The approach reflects advice from the Local Plans Expert Group which encourages authorities to build flexibility into their plans.</p> <p>4.2 A critical issue that the Discussion Paper fails to address is the extent to which the Council will need to make provision for Leicester’s unmet needs. It is understood that a Memorandum of Understanding is being prepared that will establish the extent of the unmet need and the distribution between adjoining local authorities. Evidence available to the Oadby and Wigston Examination indicates that the shortfall in Leicester City could be at least 9,800 dwellings to 2031. This level of unmet need is substantial and so far, the Councils have failed in the Duty to Cooperate to clearly agree a strategy for meeting the level of growth required to 2031 and 2036.</p> <p>4.3 Charnwood is well placed to help meet the City’s unmet needs and therefore further development within the higher order settlements such as Shepshed is supported to help accommodate future growth requirements including any identified unmet needs from Leicester.</p> <p>4.4 The Leicestershire Councils now need to work with some urgency to reach an agreement on the strategy for accommodating Leicester’s unmet needs so that this requirement can be properly factored in to the next stages in the preparation of the new Charnwood Local Plan.</p> <p>Broad Locations for Development</p> <p>4.5 The Discussion Paper outlines seven broad options for growth ranging from a focus on Leicester</p>	

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	<p>and Loughborough to a wider dispersed strategy with growth distributed across the settlement hierarchy. The option for a single standalone new settlement is also considered.</p> <p>4.6 The current spatial strategy as set out in the Core Strategy is one of urban concentration and regeneration. This has generally been successful in directing development to the sustainable locations adjoining Leicester and Loughborough and the more sustainable larger settlements such as Shepshed.</p> <p>4.7 Given the scale of growth Charnwood will need to accommodate over the plan period to 2036 even without any provision for Leicester's unmet needs, the locational strategy will need to take full advantage of opportunities available for sustainable growth. It is considered that the most deliverable option is likely to include a mix of development focused on the Leicester Urban Area and Loughborough Urban Area (including Shepshed), development in smaller new settlements and growth directed to the Service Centres and also the more sustainable rural settlements. Option 6 sets out an approach focusing on Loughborough and Leicester, new settlements and Service Centres and this is generally supported.</p> <p>4.8 Development on land to the rear of 62 Iveshead Road would logically form part of this strategy and represent a sustainable growth opportunity to deliver some 60-70 dwellings. Proposals on the site are currently being determined as part of planning application P/17/1935/2 however, the principle of residential development on the site originally established by appeal decision APP/X2410/W/15/3007980.</p> <p>4.9 The proposals for development to the rear of 62 Iveshead Road should therefore be included as a proposed allocation in the next stages of the Local Plan to help meet identified housing needs over the plan period.</p>	
<p>TLP/118 Natural England</p>	<p>We note that this document poses a number of questions within the text and we have tried to address those which are of particular relevance to our interests in the natural environment.</p> <p>2.21 Amendments to Areas of Local Separation and Green Wedges We have provided separate comments below on the Green Wedges and Areas of Local Separation Review.</p> <p>4.50 Strategy Options Natural England does not have a particular preference for the housing growth scenarios that have been set out but would wish to ensure that the chosen approach results in no adverse impact on any designated nature conservation sites or protected landscapes. We would also advise that housing development should avoid Best & Most Versatile Land (BMV) where possible. We refer back to our previous response to the Regulation 18 consultation of 23 August 2016 (our reference 190436).</p> <p>Similarly we do not have a particular preference for the employment growth scenarios that have been</p>	<p>Sustainability Appraisal We note your references to the Sustainability Appraisal in support of your suggestion that net gain should be applied to future developments.</p> <p>We note the comments on areas of local separation and green wedges, strategy options, biodiversity and nature conservation and sites promoted or suggested for development.</p> <p>The responses to the</p>

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	<p>set out but again would wish to ensure that the chosen approach results in no adverse impact on any designated nature conservation sites or protected landscapes and avoids BMV land.</p> <p>We note that the interim Sustainability Appraisal has assessed the various strategy options and alternatives. According to the assessment all the housing options have a negative effect on landscape character, biodiversity and soil resources. We also note that the employment options 2 and 3 have a negative effect on biodiversity and soil resources whilst option 1 scores more positively. We would therefore suggest that it is of great importance that the concept of net gain is applied to any future developments at these potential sites and we have provided further information on this topic below. We would also advise that Green Infrastructure is fully integrated within any future development sites at the earliest possible stages to ensure that impacts on environmental assets are mitigated and ecological links maintained and strengthened.</p> <p>Net gain</p> <p>We would take this opportunity to draw attention to the importance of incorporating the concept of net gain within the Local Plan particularly within the sections on Biodiversity and Nature Conservation. Whilst this is an approach that has been promoted for some time and is referenced in the NPPF, it has also now been included within the government's 25 year plan "A Green Future" where the principle of embedding "environmental net gain" is prominently featured. Please see the gov.uk website for further details: (https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/673203/25-year-environment-plan.pdf)</p> <p>A useful definition of biodiversity net gain is as follows: <i>"Biodiversity Net gain is about using the development process to leave the environment in a measurably better state than it was in beforehand and create a legacy of more or better quality biodiversity. Net gain can be delivered at any stage of the mitigation hierarchy and developers would be encouraged to look for opportunities to deliver net gain on site. Offsetting, or off-site solutions for achieving net gain, should only be considered when on-site solutions are not possible. Biodiversity net gain can be sought in a proportionate manner for most types of development and should be a consideration at each step in the mitigation hierarchy. The use of a calculation tool to value biodiversity is a means of making clear where gains have been made and provides a clear, transparent and evidence-based approach to assessing a project's biodiversity impacts."</i></p> <p>Your authority may therefore wish to consider including advice within the local plan or in a Supplementary Planning Document on how net gain can be demonstrated when a planning application is submitted including reference to the Defra metrics (please see attached link). Natural England would be happy to advise further on this approach. (https://www.gov.uk/government/collections/biodiversity-offsetting)</p>	<p>consultation will inform the Draft Local Plan which will be published for consultation. We welcome ongoing cooperation in developing our policies.</p>

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	<p>Sites Promoted or Suggested for Development (Appendix C) From the map provided a number of sites are in close proximity to Sites of Special Scientific Interest (SSSI):</p> <p>PSH123 is in close proximity to Loughborough Meadows SSSI PSH106 is in close proximity to Beacon Hill, Hangingstone and Out Woods SSSIs</p> <p>Any future allocations on these sites would need to provide sufficient information to provide evidence that any proposed development would not damage or destroy the interest features for which the SSSI's have been notified. There may potentially be adverse impacts from increased visitor numbers from the additional housing, possible sources of water or air pollution or impacts from the construction process. We would require evidence and suitable mitigation proposals to show that any development would have no significant impacts on the SSSIs. Further information about designated sites is available at: https://designatedsites.naturalengland.org.uk/SearchCounty.aspx</p> <p>Green Wedges and Areas of Local Separation Review Natural England generally welcomes this Review which provides a useful update of the Green Wedges (GW), Areas of Local Separation (AoLS) and Urban Fringe Green Infrastructure Enhancement Zones (GIEZ) within Charnwood District as part of the evidence base for the emerging site allocations document.</p> <p>We are pleased to note that the review considered the role that GW areas play in supporting wider green infrastructure, and that one of the criterion used to assess the purpose of GW was that it should form “<i>a strongly connected corridor or network of green infrastructure which penetrates into existing or planned areas of built form.</i>” We note that the GIEZ provide opportunities to enhance the provision of existing and new areas of green infrastructure at the fringes of urban areas, embedding high quality green space into future urban extensions, which is welcome. We are also pleased that the criteria used to assess these areas has included its role as a “nature reserve” i.e. strengthening biodiversity, geological and geomorphological conservation management and as an “outdoor classroom”.</p> <p>Whilst the information in this review is valuable evidence we suggest that the local plan would benefit from a wider strategy for green infrastructure to meet the requirements of paragraph 114 of the NPPF i.e.</p> <p><i>“114. Local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure”</i></p>	

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	<p>A Green Infrastructure Strategy for the whole Borough would provide further opportunities to enhance the natural environment together with the delivery of other multiple benefits. This could possibly build on the 6C's Green Infrastructure Strategy (2010) which we note has been referenced in this review. We would be happy to discuss this further if this would be of assistance.</p>	
<p>TLP/119 Hollins Strategic Land</p>	<p>Further to the ongoing consultation on the emerging Local Plan for Charnwood, please see attached a location plan for a site at Melton Road, Queniborough.</p> <p>The site is under the control of Hollins Strategic Land, a developer with national coverage and a track record of delivering housing and Charnwood. We consider it to be appropriate for a residential allocation in the emerging local plan.</p> <p>Further documents/information submitted with representation ref: TLP/119</p>	<p>We note the additional information you have provided for the site at Melton Road, Queniborough. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>
<p>TLP/120 Education & Skills Funding Agency</p>	<p>1. The Education and Skills Funding Agency (ESFA) welcomes the opportunity to contribute to the development of planning policy at the local level.</p> <p>2. The ESFA launched on 1st April 2017, brings together the existing responsibilities of the Education Funding Agency (EFA) and the Skills Funding Agency (SFA), to create a single funding agency accountable for funding education and training for children, young people and adults. The ESFA are accountable for £61 billion of funding a year for the education and training sector, including support for all state-provided education for 8 million children aged 3 to 16, and 1.6 million young people aged 16 to 19.</p> <p>3. Under the provisions of the Education Act 2011 and the Academies Act 2010, all new state schools are now academies/free schools and the ESFA is the delivery body for many of these, rather than local education authorities. As such, we aim to work closely with local authority education departments and planning authorities to meet the demand for new school places and new schools. We do this through a variety of means, including by supporting the adoption of sound local plan policies, site allocations and guidance (all based on robust evidence) that facilitate the delivery of education infrastructure where and when it is needed and maximise developer contributions for schools. In this capacity, we would like to offer the following comments in response to the proposals outlined in the above consultation document.</p> <p>General Comments on the Local Plan Approach to New Schools</p> <p>The ESFA notes that some growth in housing stock is expected in the borough; the document Towards a Local Plan for Charnwood (April 2018) confirms that a minimum of 8,100 new homes will be required during the plan period up to 2036.</p> <p>This will place additional pressure on social infrastructure such as education facilities. The Local Plan will need to be 'positively prepared' to meet the objectively assessed development needs and infrastructure requirements.</p>	<p>We note your comments relating to planning for schools development and we welcome ongoing cooperation in developing our policies. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation.</p>

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	<p>5. The ESFA welcomes reference within the plan (paragraph 2.35) to support the development of appropriate social and community infrastructure including the provision of new schools. In light of the requirement for all Local Plans to be consistent with national policy, you will have no doubt taken account of key national policies relating to the provision of new school places, but it would be helpful if they were explicitly referenced or signposted within the document. In particular:</p> <ul style="list-style-type: none"> - The National Planning Policy Framework (NPPF) advises that local planning authorities (LPAs) should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 72). - The ESFA supports the principle of Charnwood Borough Council safeguarding land for the provision of new schools to meet government planning policy objectives as set out in paragraph 72 of the NPPF. When new schools are developed, local authorities should also seek to safeguard land for any future expansion of new schools where demand indicates this might be necessary. - Charnwood Borough Council should also have regard to the Joint Policy Statement from the Secretary of State for Communities and Local Government and the Secretary of State for Education on 'Planning for Schools Development' (2011) which sets out the Government's commitment to support the development of state-funded schools and their delivery through the planning system.¹ <p>6. In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure (NPPF para 156) , the ESFA encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places. The ESFA note your Statement of Community Involvement (2014) is published. Please add the ESFA to your list of relevant organisations with which you engage in preparation of the plan.²</p> <p>7. In this respect, the ESFA commends, for example, the approach taken by the London Borough of Ealing in producing a Planning for Schools Development Plan Document (DPD) . We are not suggesting that Charnwood produces a separate DPD as Ealing have done, but we do believe that the systematic approach they have taken is informative for local plans. The DPD provides policy direction and establishes the Council's approach to providing primary and secondary school places and helps to identify sites which may be suitable for providing them (including, where necessary and justified, on Green Belt/MOL), whether by extension to existing schools or on new sites. The DPD includes site allocations as well as policies to safeguard the sites and assist implementation and was adopted in May 2016 as part of the Local Plan. The DPD may provide useful guidance with respect to an evidence based approach to planning for new schools in the emerging Charnwood Local Plan, securing site allocations for schools as well as providing example policies to aid delivery through Development Management policies.³</p>	

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	<p>https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/6316/1966097.pdf²</p> <p>NPPF paragraph 180 specifies that this collaborative working should include infrastructure providers.</p> <p>³ https://www.ealing.gov.uk/info/201164/local_plans/1961/planning_for_schools_dpd</p> <p>8. Ensuring there is an adequate supply of sites for schools is essential and will ensure that Charnwood can swiftly and flexibly respond to the existing and future need for school places to meet the needs of the borough over the plan period.</p> <p>Towards a Local Plan for Charnwood (Discussion Paper)</p> <p>9. We note that paragraph 2.36 of the Towards a Local Plan for Charnwood document highlights the challenges of planning for new school provision within the academy system. We encourage the allocation of land specifically for the provision of new schools, as part of large housing allocations, within the local plans as this helps to encourage the development of new schools in the locations where they are most needed whilst also increasing the range of schools available.</p> <p>10. In relation to Chapter 4 (Development Strategy Options) which sets out a range of development options for the borough ranging from 8,100 new homes up to a maximum of 15,700 homes during the plan period, the ESFA does not favour one particular strategy over another. We would, however, highlight the benefits of planning for new schools at an early stage in the planning process and where needed allocating land for new schools. The ESFA would like to be included in discussions on potential site allocations, as there may be pipeline school projects in Charnwood which may be appropriate for specific designation.</p> <p>Site Allocations</p> <p>11. At this early stage of the emerging Local Plan site allocations have not yet been drafted. The next version of the Local Plan should seek to identify specific sites (existing or new) which can deliver the school places needed to support growth, based on the latest evidence of identified need and demand in the Infrastructure Delivery Plan (2013). The site allocations or associated safeguarding policies should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary. For an example of the latter, see draft policy CC7 in Milton Keynes's Plan:MK Preferred Option draft from March 2017⁴</p> <p>12. While it is important to provide clarity and certainty to developers, retaining a degree of flexibility about site specific requirements for schools is also necessary given that the need for school places can vary over time due to the many variables affecting it. The EFSA therefore recommend the Council consider highlighting in the next version of the Local Plan that:</p>	

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	<p>- specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that - requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.</p> <p>13. The local planning authority should note that there are two routes available for establishing a new school. Firstly, where a local authority thinks a new school needs to be established, section 6A of EIA 2006 places the local authority under a duty to seek proposals from new school proposers (academy trusts) to establish an academy (free school) and to specify a date by which proposals must be submitted to the local authority. In this 'local authority presumption route' the local authority is responsible for finding the site, providing the capital and pre-/post-opening funding and managing the build process. Secondly, an academy trust can apply directly to the Department for Education during an application round or 'wave' to set up a free school. The local authority is less involved in this route but may support groups in pre-opening and/or may provide a site for basic need. For further details please see: https://www.gov.uk/government/publications/establishing-a-new-school-free-school-presumption 4 https://www.milton-keynes.gov.uk/planning-and-building/planning-policy/plan-mk</p> <p>Forward Funding</p> <p>14. In light of the options outlined in Towards a Local Plan for Charnwood, emerging ESFA proposals for forward funding schools as part of large residential developments may be relevant, for example if viability becomes an issue. The ESFA aims to be able to clarify forward funding options for schools in 2018. We would be happy to meet to discuss this opportunity further once the options have been finalised and if/when relevant. Any offer of forward funding would seek to maximise developer contributions to education infrastructure provision while supporting delivery of schools where and when they are needed.</p> <p>Developer Contributions and CIL</p> <p>15. One of the tests of soundness is that a Local Plan is 'effective' i.e. the plan should be deliverable over its period. In this context and with specific regard to planning for schools, there is a need to ensure that education contributions made by developers are sufficient to deliver the additional school places required to meet the increase in demand generated by new developments. The ESFA note that Charnwood Borough Council is considering whether CIL is necessary to deliver the proposals set out in the new Local Plan but that substantive work is not currently planned.</p> <p>16. The ESFA would be particularly interested in responding to any update to the Infrastructure Delivery Plan or review of infrastructure requirements, which will inform any future work on CIL. As such, please add the ESFA to the database for future CIL consultations.</p>	

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	<p>Conclusion 17. Finally, I hope the above comments are helpful in shaping Charnwood's Local Plan, with specific regard to the provision of land for new schools. Please advise the ESFA of any proposed changes to the emerging Local Plan policies, supporting text, site allocations and/or evidence base arising from these comments.</p>	
<p>TLP/121 Haddon Way Residents Association</p>	<p>HWRA's area has grown since inception in 2006 from the houses off Haddon Way and the old "Fairmeadows Estate" to encompass the new homes built by William Davis and Jelsons on the Grange Park Estate. We believe we now cover and represent around 2000 homes.</p> <p>We've seen houses tacked on to the entrance of the Grange Park estate (c.68 on the Chimes estate PSH246) and we've seen houses proposed just off our estate, (PSH26 Bramcote Road, which has since been built, and PSH21 Extend Park Grange Farm)</p> <p>We recognise we live in a lovely part of the borough, and that there is a housing shortage. We know it's an area where developers are keen to build. We have had feedback from residents that they are opposed to any further development in this area, but as a resident's association we know that the council have aggressive housing targets to meet. We wish to work with the council so that new parts of our estate reflect what our resident's needs are and to consider some key aspects, if this area is to be looked at again in the future.</p> <p>Area South of Woodthorpe and Grange Park Estate We notice that it has been suggested to Charnwood that they may like to ear mark the following plots for future development:</p> <ul style="list-style-type: none"> • PSH255: Land at Woodthorpe, East and West of A6004 Epinal Way [681] • PSH248: Land South of Woodthorpe and off the A6004, South of Loughborough [394] <p>We believe there should be an area of separation between the Grange Park Estate, Woodthorpe and any future development. We would also like to see an area of separation from the Great Central Railway and any future development as many people enjoy walking around the many footpaths and the railway attracts many train spotters and creates noise.</p> <p>We are concerned how the developers would access these proposed sites as the access would be off a 50mph single carriage way straight road that peaks on a bridge over the Great Central Railway. There is a park down the side of Grange Park causing a soft boundary between the development the fields, and in the distance Woodhouse. With the railway bisecting the 2 areas we are concerned about how residents and the developer would access the site, as safety and security of all should be high on the list of importance with at least 2 entry and exit points for the development.</p> <p>Area to the West of Loughborough and the Grange Park Estate We are aware that there is a proposed 3000 major home development between the edge of Loughborough and the Outwoods. As detailed in the following plots:</p>	<p>The Towards a Local Plan consultation has been informed by the Strategic Housing Land Availability Assessment which included sites which developers would like to promote for residential development. No decisions have been made at this stage about any of these sites and their suitability for allocation in the Draft Local Plan as residential sites.</p> <p>We note your concerns about any future development, the need for infrastructure, comprehensive planning and suggested areas of separation and green wedge. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation and be accompanied by an appropriate range of evidence, and supporting documents.</p>

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	<ul style="list-style-type: none"> • (PSH172: Land to the south of Nanpantan Road, Loughborough - which looks to be classified now as PSH106) • PSH284: Land south of Nanpantan Road, Loughborough [74] • PSH106: Nanpantan Grange, Land south west of Loughborough, Loughborough [1000] • PSH25: Moat Farm, Loughborough (within PSH106 area and dwellings discounted) • PSH21: Extend Park Grange Farm [100] <p>We would urge the council to consider an area of green wedge, if not an area of green separation at the very least from the Outwoods to the rest of Loughborough. The Outwoods consist of 110 acres of ancient woodland and is one of the oldest surviving woodland sites in Charnwood. It was gifted to the people of Loughborough in 1946 by two local benefactors, Allan Moss and George Harry Bowl, we think it should be protected for our children and their children to enjoy much like we have.</p> <p>Whilst we note that currently this area does not form part of a plan for major growth in the near future, it is highlighted as an area for substantial growth, should the need arise in the future. We would ask that the needs of the overall area are considered as a whole.</p> <p>Bloor homes have previously tried to develop 100 dwellings on the area PSH21: Extend Park Grange Farm. This was seen in planning application P/14/0641/2 which was rejected at Plans Committee Meeting on 14 August 2014. Bloor resubmitted and subsequently withdrew a further application P/14/2471/2, which included additional information and further clarification in relation to accessibility and proposed enhancements to bus and cycle routes. As well as further detail to the proposed landscape design and the sites relationship to the wider area and associated public open spaces. Public opinion was quite strong on this application. Residents wanted to protect features of the area for the future and were concerned about the sustainability of the site.</p> <p>By seeing this site in isolation, we have been concerned as to how it could fit in not only with our existing estate, but also this proposed 3000 area of substantial growth.</p> <p>We would like the council to consider all the areas together as a whole rather than as separate plots.</p> <p>In doing this we urge the council to ensure any development for the whole area is infrastructure led. In that access roads, ring roads, shops, schools, play parks and other amenities/facilities are all built first before dwellings are considered and built. This would enable the homes to be built with everything they need ready and waiting for them when they moved in. By doing this, the dependence on cars could be reduced and that everything a resident could need would be within walking distance. As shopping patterns and habits establish early on it is imperative that the council make sure these happen first.</p> <p>We would also advocate that the council engage with bus companies at an early stage to ensure that a</p>	

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	<p>bus route would be there from the outset.</p> <p>We hope the council take note of our desire to have an area of separation between Loughborough and other local settlements including the Great Central Railway and the Outwoods. As well as ensure any further major development is infrastructure led. We are happy to discuss with the council our experience of our “new” estate and to work with the council to ensure future development of Charnwood especially round the south of Loughborough is fitting for the surrounding existing development.</p>	
<p>TLP/122 Heaton Planning Ltd on behalf of Swithland Homes</p>	<p>Swithland Homes Swithland Homes (herein referred to as the Company) is a privately-owned house builder specialising in offering high-quality residential developments. The Company were established in 2014 and are based in Hinckley, Leicestershire. Since incorporation, the Company have grown and continue to grow, with the aim of delivering further bespoke residential solutions for a range of sites.</p> <p>The Company are able to build out multiple sites concurrently and have a range of land interests which are focused predominantly in and around Charnwood Borough. The Company specialise in the development of smaller sites, typically from single-dwellings up to developments of 10 units.</p> <p>Although the Company are a relatively young organisation its Directors are highly experienced in the development industry. It is considered by Swithland Homes that within the plan period the Company will be able to significantly increase their capacity and will be able to contribute greatly to the delivery of residential development across Charnwood through a steady supply of new dwellings.</p> <p>Need, Supply and Delivery Firstly, it is acknowledged within the <i>Towards a Local Plan for Charnwood</i> publication at paragraph 3.6 that not all of the sites contributing to the supply of new residential development in the adopted Core Strategy (and those with planning permission) will be built by 2036. This acknowledgment is in addition to the estimates of additional need for homes contained within the Leicester and Leicestershire Housing and Economic Development Needs Assessment (HEDNA).</p> <p>The Charnwood Housing Delivery Study (2017) acts as the evidence of housing delivery on which the <i>Towards a Local Plan for Charnwood</i> publication is based. The Study states at paragraph 1.7 that housing delivery rates will be “insufficient to address the undersupply from previous years, and meet new housing need annually, and without proactive intervention there will remain an undersupply of housing probably into the mid to late 2020s.”</p> <p>The Company are suited to the delivery of a range of smaller residential developments (in greater detail below) which can assist in addressing the shortfall of housing delivery across the Borough. Swithland Homes can offer fast, bespoke residential development completions across the Borough throughout the emerging plan period to meet identified need for high quality family homes.</p>	<p>We note your comments relating to locations for housing growth, the role of smaller sites and settlement limits to development. The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p>

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	<p>Importance of Smaller Sites – Local Guidance</p> <p>The Housing Delivery Study specifically outlines that the Borough has a “shortfall in short-term land supply ... primarily due to the lead-in times associated with bringing forward large sites.” Proactive engagement with local house building enterprises such as Swithland Homes can contribute towards finding a solution to resolving the shortfall in the delivery of residential completions across Charnwood.</p> <p>The Company are able to offer a range of smaller-scale development sites which together would contribute towards meeting the housing needs of the Borough across the plan period to 2036. Well known delays associated with large housing developers delivering sites, in particular those with interests in multiple large sites with large infrastructure demands (which in Charnwood include Barwood Homes, Davidsons Homes, David Wilson Homes, Persimmon, Taylor Wimpey and William Davis), can lead to unnecessary housing delivery risks should any of the large housebuilders with multiple interests fail to deliver on their consented sites.</p> <p>The Housing Delivery Study emphasises the risks associated with a small number of scheme promoters controlling multiple sites. It is noted at paragraph 12.4 that a small number of promoters with interests in a significant proportion of the units to be delivered across the Borough “may reduce incentives to deliver at pace, especially in times of lower demand when prices are stagnant or falling.”</p> <p>Future versions of the emerging Charnwood Local Plan should not only emphasise the important contribution that smaller sites will make to meeting the housing targets for the Borough, but should also modify and standardise the definition of ‘large’ and ‘small and medium’ sites. The terminology and methodology used to determine what comprises a ‘small’ site should be brought in line with that contained within the emerging draft NPPF (discussed in further detail below).</p> <p>At present, the Housing Delivery Study for Charnwood has classed residential schemes under 500 units as ‘small and medium’ sites with no further differentiation. The methodology used to date is unsatisfactory in its characterisation of large, wide-spanning residential developments and very small schemes for a small number of units on physically-limited plots.</p> <p>Importance of Smaller Sites – National Guidance</p> <p>The importance of the contribution of small sites to meeting housing delivery targets is paramount, as has been emphasised by recent national policy publications such as the Government Housing White Paper titled ‘Fixing Our Broken Housing Market’.</p> <p>The White Paper has confirmed the Government acknowledges the role of small housebuilders such as Swithland Homes and intends to amend national planning policy to ensure that the planning system delivers sufficient opportunities for small housebuilders to contribute to a broadening of the housing market and prosper. The Housing White Paper identifies small housing sites as those which are capable of accommodating 10 units or fewer, or which are smaller than 0.5 ha. As noted previously,</p>	

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	<p>Swithland Homes have an excellent track record of delivering successful developments on such sites.</p> <p>Paragraph 1.29 of the white paper states that “Policies in plans should allow a good mix of sites to come forward for development, so that there is choice for consumers, places can grow in ways that are sustainable, and there are opportunities for a diverse construction sector. Small sites create particular opportunities for custom builders and smaller developers. They can also help to meet rural housing needs in ways that are sensitive to their setting while allowing villages to thrive”.</p> <p>Furthermore, the draft revised National Planning Policy Framework (March 2018) contains measures to encourage the greater use of small sites to help diversify opportunities for builders. The proposed text at paragraph 69 states that local planning authorities should ensure that <u>at least 20%</u> of sites identified for housing within local plans are of half a hectare or less. Paragraph 69 also refers to measures to provide greater guidance in designing for small sites.</p> <p>Paragraph 70 also emphasises that Neighbourhood Planning Groups should consider the opportunities for allocating small sites for housing in their area. The Local Plan has an important role to play in devising requirements for Neighbourhood Plan Groups to work within and ensuring sufficient support is available to ensure a positive approach to the benefits of development are acknowledged in policies.</p> <p>It is likely that the final version of the revised NPPF is to be published shortly and given the strength of Government support signalled within the White Paper it is anticipated that the support for small sites will continue.</p> <p>It is considered that in preparing the Local Plan, the Council should ensure that the role of small sites and developers such as Swithland Homes are appropriately recognised within the policies and associated land allocations.</p> <p>Housing Strategy Options Chapter 4 of <i>Towards a Local Plan for Charnwood</i> ‘What are the Reasonable Development Strategy Options’ considers the environmental, social and economic effects of a range of ‘options’ that are put forward within the document to form the Borough’s housing strategy to 2036.</p> <p>It is considered that the points within paragraph 4.6 of <i>Towards a Local Plan for Charnwood</i> whereby it is stated that providing a ‘minimum requirement’ of land needed for housing would result in a lack of flexibility over the Plan period and could result in the Plan becoming quickly out of date. This is a particular risk due to the Borough’s historic failure to meet completion targets. It is important for the Borough that this emerging Local Plan provides for sufficient housing land to minimise the risk of falling below a five-year supply of housing land and applications being considered under the national presumption in favour of sustainable development. Swithland Homes are capable of quickly</p>	

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	<p>addressing shortfalls in supply of land for housing, with a plethora of smaller residential site opportunities situated across the Borough.</p> <p>Whilst it is acknowledged that going forward the Council's housing strategy will be a hybrid of the options presented in the <i>Towards a Local Plan for Charnwood</i> publication, it is appropriate for Swithland Homes to show support for a dispersed distribution of new residential sites across the Borough. This approach is best represented within the housing strategy options in <i>Towards a Local Plan for Charnwood</i> by Options 3 and 4.</p> <p>In addition, the smaller residential developments built-out by the Company are also likely to often be less environmentally constrained when compared with larger developments spanning several hectares. Options 3 and 4 of the housing strategy options will lessen the potential for concentrated environmental impacts on a specific location.</p> <p>A dispersed pattern of residential development across the Borough will support the economic and social viability of smaller settlements and the Company are positioned to offer bespoke housing solutions sympathetic to the requirements of each site on an individual basis.</p> <p>The high-quality developments produced by Swithland Homes would make an important positive contribution, where required, to settlements across Charnwood in terms of design, form, and contribution to the character and functions of the surrounding landscape.</p> <p>Settlement Limits to Development Comments have been invited on the key evidence that has informed the <i>Towards a Local Plan for Charnwood</i> publication, including the Settlement Limits to Development Assessment undertaken. Two principles are listed in the Methodology chapter of the Settlement Limits to Development Assessment. In defining settlement boundaries/limits to development, 'Principle 1' "tightly defines the settlement by enclosing the established, cohesive built form."</p> <p>To prepare settlement limits based on such a criteria, <u>prior</u> to undertaking an updated SHLAA process is, in our view, an illogical approach. It is notable from comparison of the adopted settlement limits and those shown at Annex A to the Settlement Limits to Development Assessment that boundaries have been tightened around existing built development seemingly wherever possible. In some instances, settlement limits have been tightened to exclude sites that have previously been promoted to the Council as potential residential developments that are able to be completed well within the plan period.</p> <p>Furthermore, the tightening of settlement limits effectively acts as a hurdle to the deliverability of residential development, in particular at sustainable edge-of-settlement or infill locations. It is considered that this approach is at odds with the evidence informing the emerging Charnwood Local</p>	

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	<p>Plan which emphasises the poor delivery rates across the Borough and the urgent requirement for new homes.</p> <p>Conclusions As a stable and growing private housebuilder, Swithland Homes would grasp the opportunity to assist in delivering high-quality developments across a range of sites. The Company have no desire to delay the delivery of new homes and once planning permission can be realised aim to build-out projects as soon as possible.</p> <p>Recently-published and emerging national policy guidance contains support for the contribution of smaller residential developments in meeting unmet supply of housing land. This national emphasis should be reflected in future versions of the emerging Charnwood Local Plan.</p> <p>Swithland Homes look forward to the opportunity to submit potential housing sites for inclusion within the Charnwood SHLAA and look forward to working with Charnwood Borough Council across the emerging plan period to 2036. It is hoped that future versions of the emerging Plan will fully reflect the importance of housing delivery and reflect this in written policy and through greater flexibility for settlement limits.</p>	
<p>TLP/123 West Leicestershire Clinical Commissioning Group</p>	<p>At present, we hear from practices on a daily basis that they are struggling to manage patient demand and increasing list sizes. Shortages of GP and Nursing staff and difficulties in recruiting are putting increasing pressure on practices. In addition there is huge variation in the size and quality of GP practice premises which places constraints on the delivery of services – this is not often taken into account when housing developments are planned.</p> <p>West Leicestershire CCG has worked hard to develop relationships with local councils since gaining delegated commissioning responsibilities from NHS England. By doing so we have maximised opportunities to get investment in primary care premises through Section 106 monies. At present, large scale capital investment in premises is limited and only a small number of practices benefit from this; therefore Section 106 contributions provide an important funding stream for improvement work. Any significant housing development and population growth will therefore put additional pressure onto a system which is already struggling and needs to be planned for and funded appropriately, and in a timely manner.</p> <p>Each of the proposed settlement categories will impact the practices whose boundary includes these areas, for a variety of reasons. For example;</p> <ul style="list-style-type: none"> • Barrow Health Centre would pick up patients not only from proposed developments in Barrow Upon soar, but also from Cotes and Wymeswold – placing a huge burden on an already overstretched practice. • Quorn Medical Centre is situated in a land locked location and has experienced difficulty in 	<p>We note your comments on capacity of infrastructure and no current plans for additional practices. We welcome ongoing cooperation in developing our policies. The responses received to this consultation will be considered and used to inform the preparation of the Draft Local Plan which will be published for consultation which will be accompanied by an appropriate range of evidence, and supporting documents.</p>

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	<p>obtaining planning permission to extend the premises to accommodate patients from existing developments; a further development of 674 homes would be create an unmanageable demand on the practice.</p> <ul style="list-style-type: none"> • Forest House Surgery in Shepshed is already struggling to cope with demand from housing development. The practice is located in a listed building and therefore is restricted in terms of extension/expansion options to increase capacity. • There is currently no primary healthcare facility located in Rothley. New patients would have to register in practices located in Mountsorrel; which are already overstretched in terms of capacity. <p>Local healthcare commissioners are developing a Leicester, Leicestershire & Rutland Strategic Estates Plan to plan and prioritise healthcare estates across the whole area. At this time there is no strategic plan to commission any new primary medical health care facilities or general practice contracts; meaning existing practices would be required to meet the demand of the increased population. The CCG therefore would urge the council to consult with NHS commissioners prior to agreeing land 'gifts' from developers in lieu of section 106 healthcare contributions.</p> <p>The CCG would also like the council to consider occupancy trigger points detailed within the section 106 agreements and the impact they can have on general practice. The majority of WLCCG practices are working at capacity and would require funding to increase their capacity <u>before</u> new patients start to register. Currently there are many agreements with either protracted phasing of the development and/or of the occupancy trigger points. This places additional pressure on overstretched resources until such time as funding is released. Large scale schemes such as the ones proposed in the local plan would require significant capital premises investment before homes are occupied to create the much needed additional capacity.</p>	
<p>TLP/124 Fisher German on behalf of Rearsby Trust</p>	<p>INTRODUCTION These representations are made on behalf of the Rearsby Trust in respect of its land interests at Gaddesby Lane, Rearsby and at Rearsby Business Park.</p> <p>The land at Gaddesby Lane is identified by reference number PSH100 in Appendix C of the consultation document 'Towards a Local Plan for Charnwood', April 2018. Figure 1 below illustrates the site location. Rearsby Business Park is referred to in Appendix E of the document as PSE349, land beyond the business park is referred to as PSE268, as illustrated in Figure 2 below.</p> <p>Figure 1. Land promoted for residential development at Gaddesby Lane, Rearsby. Figure 2. Rearsby Business Park,</p> <p>HOW MUCH DEVELOPMENT IS NEEDED? The review proposes a minimum housing requirement of 24,850 dwellings (944 dwellings per annum) for the Plan period 2011 to 2036. However, the Government has recently consulted on a standardised methodology for the calculation of Objectively Assessed Housing Need (OAHN). By the time the</p>	<p>We note your comments related to land at Gaddesby Lane, Rearsby and Rearsby Business Park on housing need and housing and employment options. No decisions have been made at this stage about the preferred approach. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>We also note the additional information provided.</p>

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	<p>Charnwood Local Plan is submitted for Examination, the Governments standard methodology will have been implemented. Using the proposed methodology, the minimum OAHN for the Leicester and Leicestershire Housing Market Area (HMA) is estimated as 4,743 dwellings per annum and for Charnwood 1,047 dwellings per annum. An increase of 103 dwellings per annum on that currently being proposed. The Plan needs to be amended to reflect this and to ensure that the housing needs of the Borough are met. In so doing it needs to be recognised that the standard methodology is only a minimum starting point; the Governments objective of significantly boosting the supply of homes remains.</p> <p>HOUSING STRATEGY OPTIONS</p> <p>Whilst it is recognised that the new Plan needs to be aligned with the spatial distribution strategy of the non-statutory Leicester and Leicestershire SGP (which proposes to deliver growth in strategic locations and less on non-strategic sites) it needs to be recognised that large, strategic sites can take a long time to develop and as such are unlikely to meet the OAHN over the Plan period. In addition, such an approach will not sustain rural communities. Many of the rural communities have aging populations. Directing growth only to strategic sites will risk the vitality and viability of the services and facilities in the rural areas; for example, an aging population will not support village Primary Schools, new development is needed to enable young families to move into these settlements and support the services they offer.</p> <p>Growth Option 3, Settlement Hierarchy Distribution, or Option 4, Proportionate Distribution are therefore considered the most appropriate strategies to distribute housing over the Plan period. Focusing development in accordance with the settlement hierarchy, or proportional distribution will ensure that whilst the majority of development is directed to the most sustainable settlements and strategic sites, rural settlements (down to 'Other Settlement' level) will continue to thrive.</p> <p>Settlements such as Rearsby (identified as an 'Other Settlement') are sustainable and can meet the day to day needs of residents. Small scale development in these settlements will ensure that services such as the village Primary School are able to thrive and will ensure that the Borough is able to meet its OAHN over the Plan period. Small sites, in settlements such as Rearsby can deliver quickly. Sites of approximately 50 dwellings attract a range of housebuilders and can from planning being granted, be built out within two years, immediately making a positive contribution to the Councils housing land supply. Strategic sites cannot deliver at this pace. In addition, and as the consultation document rightly identifies (para 4.25) distribution of housing across the Settlement Hierarchy will provide flexibility and a choice of sites an is more likely to ensure that the housing needs are met over the Plan period, and that the needs of communities are also met.</p> <p>Sites such as land at Gaddesby Lane, Rearsby should be allocated for development. The site could deliver up to 50 dwellings. The site is within walking distance of services and facilities in the village as well as employment opportunities at Reabsy Bussiness Park to the east. The site is Suitable, Available and Achievable:</p>	<p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p>

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	<p>Suitable – There are no known irresolvable physical/environmental constraints preventing development of the land off Gaddesby Lane, Rearsby. The site is in a suitable location for development directly adjacent to a village with a good range of services and facilities. Access to the site can be achieved without constraint from Gaddesby Lane.</p> <p>Available – The site is privately owned. The landowner is committed to the delivery of the site and will continue to promote the site and bring forward a planning application at the most appropriate point in time. There is good developer interest in the site.</p> <p>Achievable – The site can be delivered within 5 years. There are no irresolvable market factors affecting the development of the site, indeed, there is developer interest in the site. There are no irresolvable cost factors affecting the development of the site, nor are there any irresolvable delivery factors affecting development.</p> <p>EMPLOYMENT STRATEGY OPTIONS A combination of all of the options is supported. However, whichever option is progressed, the Plan has to recognise the need of existing sites to be able to grow. At present none of the options presented provide for this. Thriving employment sites, such as the Rearsby Business Park need the opportunity and flexibility to expand to meet the needs of both the existing occupiers of the site and to meet the needs of new businesses. It is considered that additional land, adjacent to the Business Park should be allocated for employment uses, to provide flexibility and support the local economy in this area. Figure 3 below illustrates the land proposed for allocation for employment use (referred to as PSE268 in Appendix E of the consultation document.</p> <p>Figure 3. Rearsby Business Park expansion land</p> <p>Further documents/information submitted with representation ref: TLP/124</p>	
<p>TLP/125 Rearsby Parish Council</p>	<p>1) Local Plan Sustainability Appraisal The need to ensure that development for both housing and employment happens in a sustainable way is supported by the Parish Council and we welcome this document. As a very small village in the Wolds with limited facilities any significant development in the village would lead to additional car journeys. We recognise the need for small appropriate development and infill of less than twelve houses but need to protect the village's identity. As a Parish council more time is being spent on planning matters with some speculative planning applications by developers in the village which are not appropriate forms of development. Clear direction from the Borough Council on where development should be undertaken is welcomed by the Parish Council.</p> <p>2) Settlement Hierarchy Assessment The analysis of facilities required is comprehensive and reflects modern life. The audit of facilities at each location leads to clear identification of the areas that can better sustain future development. As a</p>	<p>Sustainability Appraisal We note your welcome for the sustainability appraisal document.</p> <p>We note your comments on the location of development, the settlement hierarchy, settlement limits to development and area of separation.</p> <p>The responses to the consultation will inform the Draft</p>

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	<p>small village identified as an 'other settlement' suitable for small scale and infill development only we support the Borough Council in making clear where development is appropriate and the scale of such development.</p> <p>3) Settlement Limits to Development Assessment Rearsby has a clear centre to the village which is also a Conservation Area with many listed buildings. The proposed settlement limits include two recent planning applications which were previously outside the limits to development which we welcome. Through our Neighbourhood Plan work we have had a lot of feedback from residents on this issue identifying areas where the new settlement limits cut through gardens where previously the boundary followed the land ownership, therefore including all of the garden. Concern was raised about how this might impact possible house extensions in the future and any other land use. In other areas the new boundaries follow the line of open space around the Brook area and the paddocks excluding both the paddocks and Manor Farm from the settlement, which was welcomed by the residents. The new limits to development are more restrictive and leave very little opportunities for any future development in the village. We note that the Business Park in the Parish is not affected by this review.</p> <p>4) Green Wedge and Areas of Local Separation Review Rearsby has an Area of Local Separation identified by this document it is ALS –N between Rearsby and East Goscote. This is a very small gap at its narrowest it is just 230m wide and this area has been the subject of multiple planning applications by Developers. The two villages are very different East Goscote being a 1960's brownfield development as a new village and Rearsby being an old rural settlement dating back hundreds of years and being listed in the Domesday Book. The residents of both villages are very concerned that the separate identities would be lost if the ALS was developed and see this area as key to protecting the visual gap between the built up areas. We welcome this report and would add that this ALS should be categorised as Strong due to its importance in providing the visual separation between the villages.</p>	Local Plan which will be published for consultation.
TLP/126	I think it is important to maintain areas of separation between settlements so that each settlement retains a sense of identity, and to protect that separation by the most effective planning policies available.	We note your comments relating to the importance of retaining areas of local separation. The responses to the consultation will inform the Draft Local Plan which will be published for consultation.
TLP/127 Pegasus on behalf of Rothley Temple Estate	<p>1. INTRODUCTION</p> <p>1.1 These submissions have been prepared on behalf of Rothley Temple Estate Limited who have interests in land to the south-west of Rothley. We have previously made submissions to the Council on the opportunity for sustainable growth in this location, including identifying the site in the Strategic Housing Land Availability Assessment (SHLAA)(ref PSH400).</p>	We note your comments in relation to land at land south west of Rothley on Vision for Charnwood, Areas of Local Separation and Green Wedges, the Settlement Hierarchy and

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	<p>2. VISION FOR CHARNWOOD IN 2036</p> <p>2.1 The Discussion Paper refers to the adopted Core Strategy which sets out the vision for Charnwood up to 2028. The Paper invites views on whether the current development strategy should be extended or whether something different should happen.</p> <p>2.2 The Charnwood Core Strategy Vision sets out an urban focused approach with development directed towards Loughborough and the edge of Leicester City, with a more limited amount of development directed to the more sustainable Service Centres, including Rothley.</p> <p>2.3 In the context of future growth in Charnwood, it is considered that there remain opportunities for sustainable growth in Service Centres such as Rothley which offer a wide range of local services and facilities and good public transport connectivity to Loughborough and Leicester. It is therefore considered that the overall vision set out in the Core Strategy, reflecting an urban focused approach to development recognising the important role to be played by the more sustainable Service Centre villages, is a generally appropriate vision to take forward over the period to 2036.</p> <p>2.4 We comment below on the settlement hierarchy and the identified reasonable development strategy options.</p> <p>3. AREAS OF SEPARATION AND GREEN WEDGES</p> <p>3.1 The Discussion Paper refers to the Green Wedge and Local Separation Review, 2016 which has informed proposals to amend existing Areas of Green Wedge and Local Separation.</p> <p>3.2 For the land to the south-west of Rothley, the study proposes the identification of an Area of Local Separation between the southern edge of new development to the south of Rothley and the Local Plan Core Strategy Broadnook allocation north of Birstall.</p> <p>3.3 The Local Separation Review Paper does not provide a sufficiently fine grained assessment of the land to the south of Rothley to identify the potential for some additional growth without threatening the separation between Rothley and the Broadnook development north of Birstall.</p> <p>3.4 We have included as part of these submissions an indicative concept plan showing how some further development could take place to the south-west of the recent development by Charles Church Limited. Development could take place without prejudicing the separate identities of Rothley and Birstall.</p> <p>3.5 Additional development in this location could provide additional land for what is understood to be a required extension to the new Rothley Primary School. In association with the development of approximately 80 homes, contributions could be made to the provision of additional land for the extension of the new school facilities.</p>	<p>Settlement Limits and the Housing Strategy Options. No decisions have been made at this stage about the preferred approach. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>We also note the additional information provided.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation</p>

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	<p>4. SETTLEMENT HIERARCHY AND SETTLEMENT LIMITS TO DEVELOPMENT</p> <p>4.1 The Settlement Hierarchy contained within the Discussion Paper has been informed by a Settlement Hierarchy Assessment (2018). The assessment informs the proposed Settlement Hierarchy as set out in Table 1 to the Discussion Paper.</p> <p>4.2 The proposed settlement hierarchy largely reflects the hierarchy as set out in the adopted Core Strategy, other than the upgrading of Syston to an 'urban settlement', which, along with Birstall and Thurmaston, physically or functionally forms part of a wider Leicester Urban Area.</p> <p>4.3 Rothley is identified as a Service Centre reflecting the range of services and facilities available in the village and to good public transport connectivity to both Loughborough and Leicester.</p> <p>4.4 The Settlement Hierarchy recognises that Rothley has all the essential services and the majority of the identified desirable services, with excellent transport connections with a 15 minute frequency bus service to Loughborough and Leicester within a 30 minute travel time.</p> <p>4.5 It is important that the new Local Plan properly recognises the sustainability credentials of the Service Centres and the opportunities for some further limited growth to help meet the overall housing requirement. Land to the south-west of Rothley provides an opportunity for further growth to support the required expansion of newly created educational facilities for the wider benefit of the village.</p> <p>5. HOUSING STRATEGY OPTIONS Housing Strategy Options - Growth Scenarios</p> <p>5.1 In terms of housing need and supply, the Discussion Paper states that a minimum of 8,100 homes are needed to flexibly meet the needs in the Borough to 2036 over the commitments outlined in the adopted Core Strategy. This reflects evidence as set out in the Housing and Economic Development Needs Assessment. Paragraph 4.5 of the Discussion Paper indicates a greater supply of land, for up to 15,700 homes, would maximise the potential for maintaining housing supply by providing flexibility to take account of changing circumstances. We support this approach as this would provide necessary flexibility to take account of changing circumstances.</p> <p>The approach reflects advice from the Local Plans Expert Group which encourages authorities to build flexibility into their plans.</p> <p>5.2 A critical issue that the Discussion Paper fails to address is the extent to which the Council will need to make provision for Leicester's unmet needs. It is understood that a Memorandum of Understanding is being prepared that will establish the extent of the unmet need and the distribution between adjoining local authorities. Evidence available to the Oadby and Wigston Examination indicates that the shortfall could be at least 9,800 dwellings to 2031. This level of unmet need is substantial and so far, the Councils have failed in the Duty to Cooperate to clearly agree a strategy for meeting the level of growth</p>	

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	<p>required to 2031 and 2036.</p> <p>5.3 Charnwood is well placed to help meet the City's unmet needs. Given Rothley's relationship with the City, development to the south-west of the settlement represents a highly sustainable opportunity to help accommodate future growth requirements including any identified unmet needs from Leicester.</p> <p>5.4 The Councils now need to work with some urgency to reach an agreement on the strategy for accommodating Leicester's unmet needs so that this requirement can be properly factored in to the next stages in the preparation of the new Charnwood Local Plan.</p> <p>Broad Locations for Development</p> <p>5.5 The Discussion Paper outlines seven broad options for growth ranging from a focus on Leicester and Loughborough to a wider dispersed strategy with growth distributed across the settlement hierarchy. The option for a single standalone new settlement is also considered.</p> <p>5.6 The current spatial strategy as set out in the Core Strategy is one of urban concentration and regeneration. This has generally been successful in directing development to the sustainable locations adjoining Leicester and Loughborough and the more sustainable larger Service Centres.</p> <p>5.7 Given the scale of growth Charnwood will need to accommodate over the plan period to 2036 even without any provision for Leicester's unmet needs, the locational strategy will need to take full advantage of opportunities available for sustainable growth. It is considered that the most deliverable option is likely to include a mix of development focused on the existing urban areas of Leicester and Loughborough, development in smaller new settlements and growth directed to the Service Centres and also the more sustainable rural settlements. Option 6 sets out an approach focusing on Loughborough and Leicester, new settlements and Service Centres. In our view the option should also consider options for growth in the more sustainable 'other settlements'. This 'hybrid' of Option 6 is considered to represent the most sustainable strategy for the Borough.</p> <p>5.8 Development to the south-west of Rothley would logically form part of this strategy and represent a sustainable growth opportunity to deliver approximately 80 dwellings. As part of these submissions we have included an indicative masterplan showing how the site could be developed. The masterplan proposals include provision for the expansion of the new Rothley Primary School, reflecting requirements identified by the Head Teacher for new classrooms, a hall and staff parking. The proposal is a logical extension to recent southern growth to the settlement and would not result in the merging of Rothley and Birstall to the south.</p> <p>5.9 The proposals for a south-western extension at Rothley should be included as a proposed allocation in the next stages of the Local Plan to help meet identified housing needs over the plan period.</p>	

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<p>TLP/128 Pegasus on behalf of Wilson Enterprise Ltd</p>	<p>Further documents/information submitted with representation ref : TLP/127</p> <p>1. INTRODUCTION</p> <p>1.1 These submissions have been prepared on behalf of the Wilson Enterprises Limited who have interests in land to the north-east of Leicester Road, Thurgate. We have previously made submissions to the Council on the opportunity for sustainable growth in this location, including identifying the site in the Strategic Housing Land Availability Assessment (SHLAA) (ref PSH120).</p> <p>2. VISION FOR CHARNWOOD IN 2036</p> <p>2.1. The Discussion Paper refers to the adopted Core Strategy which sets out the vision for Charnwood up to 2028. The Paper invites views on whether the current development strategy should be extended or whether something different should happen.</p> <p>2.2 The Charnwood Core Strategy Vision sets out an urban focused approach with development directed towards Loughborough and the edge of Leicester City, with a more limited amount of development directed to the more sustainable Service Centres.</p> <p>2.3 In the context of future growth in Charnwood, it is considered there will continue to be a need to focus growth on the edge of Leicester City. Locations within Charnwood adjoining the wider Leicester urban area, offer some of the more sustainable locations, enjoying easy access to more local facilities available in nearby settlements and also easy access to the higher order facilities and services available in the City. It is therefore considered that the overall vision set out in the Core Strategy, reflecting an urban focused approach to development, is a generally appropriate vision to take forward over the period to 2036.</p> <p>2.4 We comment below on the settlement hierarchy and the identified reasonable development strategy options.</p> <p>3. AREAS OF SEPARATION AND GREEN WEDGES</p> <p>3.1 The Discussion Paper refers to the Green Wedge and Local Separation Review, 2016 which has informed proposals to amend existing Areas of Green Wedge and Local Separation.</p> <p>3.2 For the land to the north-east of Thurgate, the study does not identify the site as falling within any proposed Area of Local Separation. The study identifies land further to the north-east of the site, beyond the Great Central Railway, as a potential location for a new Area of Local Separation between Rothley and Birstall.</p> <p>3.3 We have included as part of these submissions an indicative concept plan showing how the development of a new sustainable neighbourhood could take place on land between Leicester Road and the Great Central Railway which would not prejudice the separate identities of Rothley and Birstall.</p>	<p>We note your comments relating to land to the north-east of Leicester Road on the Vision for Charnwood, Areas of Local Separation and Green Wedges, the Settlement Hierarchy and Settlement Limits and the Housing Strategy Options. No decisions have been made at this stage about the preferred approach. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>We also note the additional information provided.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation</p> <p>We note your comments on behalf of Wilson Enterprises Ltd. No decisions have been taken yet about the preferred approach or the allocation of sites to deliver the approach. All of the responses to the consultation will be considered during the preparation of the Draft Local Plan.</p>

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	<p>3.4 The development of a new settlement on the land to the north-east of Leicester Road could provide for some 620 dwellings along with a new primary school, offering a sustainable development solution to help meet future housing needs including unmet needs for Leicester.</p> <p>4. SETTLEMENT HIERARCHY AND SETTLEMENT LIMITS TO DEVELOPMENT</p> <p>4.1 The Settlement Hierarchy contained within the Discussion Paper has been informed by a Settlement Hierarchy Assessment (2018). The assessment informs the proposed Settlement Hierarchy as set out in Table 1 to the Discussion Paper.</p> <p>4.2 The proposed settlement hierarchy largely reflects the hierarchy as set out in the adopted Core Strategy, other than the upgrading of Syston to an ‘urban settlement’, which, along with Birstall and Thurmaston, physically or functionally forms part of a wider Leicester Urban Area.</p> <p>4.3 Land to the north-east of Leicester Road, Thurcaston adjoins the wider Leicester urban area. To the east of the site is the Broad nook development allocated in the Core Strategy and to the south is the Ashton Green development area within Leicester City.</p> <p>4.4 The supporting Sustainability Appraisal at Appendix A, identifies the edge of Leicester Urban area as encompassing land immediately adjacent to the boundary as well as the wider urban areas of Birstall, Thurmaston and Syston. This shows land to the north-east of Thurcaston as part of the Edge of Leicester area.</p> <p>4.5 It is important that the new Local Plan properly recognises the sustainability credentials of land adjoining the wider Leicester Urban Area. Land to the north• east of Thurcaston provides an opportunity for further growth well related to the Leicester urban area that can also provide new local services for the benefit of existing residents.</p> <p>5. HOUSING STRATEGY OPTIONS Housing Strategy Options - Growth Scenarios</p> <p>5.1 In terms of housing need and supply, the Discussion Paper states that a minimum of 8,100 homes are needed to flexibly meet the needs in the Borough to 2036 over the commitments outlined in the adopted Core Strategy. This reflects evidence as set out in the Housing and Economic Development Needs Assessment. Paragraph 4.5 of the Discussion Paper indicates a greater supply of land, for up to 15,700 homes, would maximise the potential for maintaining housing supply by providing flexibility to take account of changing circumstances. We support this approach as this would provide necessary flexibility to take account of changing circumstances. The approach reflects advice from the Local Plans Expert Group which encourages authorities to build flexibility into their plans.</p> <p>5.2 A critical issue that the Discussion Paper fails to address is the extent to which the Council will need to make provision for Leicester’s unmet needs. It is understood that a Memorandum of Understanding is</p>	

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	<p>being prepared that will establish the extent of the unmet need and the distribution between adjoining local authorities. Evidence available to the Oadby and Wigston Examination indicates that the shortfall could be at least 9,800 dwellings to 2031. This level of unmet need is substantial and so far, the Councils have failed in the Duty to Cooperate to clearly agree a strategy for meeting the level of growth required to 2031 and 2036.</p> <p>5.3 Charnwood is well placed to help meet the City's unmet needs. Given Thurcaston's relationship with the City, development to the north-east of the settlement represents a highly sustainable opportunity to help accommodate future growth requirements including any identified unmet needs from Leicester.</p> <p>5.4 The Councils now need to work with some urgency to reach an agreement on the strategy for accommodating Leicester's unmet needs so that this requirement can be properly factored in to the next stages in the preparation of the new Charnwood Local Plan.</p> <p>Broad Locations for Development</p> <p>5.5 The Discussion Paper outlines seven broad options for growth ranging from a focus on Leicester and Loughborough to a wider dispersed strategy with growth distributed across the settlement hierarchy. The option for a single standalone new settlement is also considered.</p> <p>5.6 The current spatial strategy as set out in the Core Strategy is one of urban concentration and regeneration. This has generally been successful in directing development to the sustainable locations adjoining Leicester and Loughborough and the more sustainable larger Service Centres.</p> <p>5.7 Given the scale of growth Charnwood will need to accommodate over the plan period to 2036 even without any provision for Leicester's unmet needs, the locational strategy will need to take full advantage of opportunities available for sustainable growth. It is considered that the most deliverable option is likely to include a mix of development focused on the existing urban areas of Leicester and Loughborough, development in smaller new settlements and growth directed to the Service Centres and also the more sustainable rural settlements. Option 6 sets out an approach focusing on Loughborough and Leicester, new settlements and Service Centres. In our view the option should also consider options for growth in the more sustainable 'other settlements'. This 'hybrid' of Option 6 is considered to represent the most sustainable strategy for the Borough.</p> <p>5.8 The development of a new settlement to the north-east of Thurcaston would logically form part of this strategy and represent a sustainable growth opportunity to deliver some 620 dwellings. As part of these submissions we have included a Promotional Document, including an indicative masterplan showing how the site could be developed. The masterplan proposals illustrate the opportunity to provide a small new settlement to provide some 620 dwellings along with a new primary school and areas of new children's play space and areas for informal recreation. The masterplan also includes land that could be made available for new or improved local community facilities.</p>	

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	<p>5. 9 The proposals for north-east Thurcaston should be included as a proposed allocation in the next stages of the Local Plan to help meet identified housing needs over the plan period.</p> <p>Further documents/information submitted with representation ref : TLP/128</p>	
<p>TLP/129 Pegasus on behalf of Davidsons Developments Ltd</p>	<p>1. INTRODUCTION</p> <p>1.1 These submissions have been prepared on behalf of Davidsons Developments Limited who have interests in land to the south of Anstey, north and south of Groby Road. We have previously made submissions to the Council on the opportunity for sustainable growth to the south of Anstey, including identifying the site in the Strategic Housing Land Availability Assessment (SHLAA) (ref PSH389).</p> <p>2. VISION FOR CHARNWOOD IN 2036</p> <p>2.1 The Discussion Paper refers to the adopted Core Strategy which sets out the vision for Charnwood up to 2028. The Paper invites views on whether the current development strategy should be extended or whether something different should happen.</p> <p>2.2 It is noted that the Leicestershire Authorities have also published the Draft Leicester and Leicestershire Strategic Growth Plan which sets out a strategic vision for growth in the area up to 2050. As part of a consortium of developers, Davidsons made submissions to the Strategic Growth Plan consultation. That submission is relevant to the preparation of Charnwood's new Local Plan and should be taken into account by officers. For convenience, a copy of the response to the Strategic Growth Plan is attached to these representations.</p> <p>2.3 The Charnwood Core Strategy Vision sets out an urban focused approach with development directed towards Loughborough and the edge of Leicester City. The Strategic Growth Plan suggests a strategy that directs growth to support key infrastructure provision, including a proposed A46 Expressway around the east and south of Leicester.</p> <p>2.4 In the context of future growth in Charnwood, it is considered that there remain opportunities for sustainable growth in settlements such as Anstey that are well related to the Leicester urban area. It is therefore considered that the overall vision set out in the Core Strategy, reflecting an urban focused approach to development is a generally appropriate vision to take forward over the period to 2036.</p> <p>2.5 We comment below on the settlement hierarchy and the identified reasonable development strategy options.</p> <p>3. AREAS OF SEPARATION AND GREEN WEDGES</p> <p>3.1 The Discussion Paper refers to the Green Wedge and Local Separation Review, 2016 which has informed proposals to amend existing Areas of Green Wedge and Local Separation.</p> <p>3.2 For the land to the south of Anstey, the study does not recommend any changes to the existing Green Wedge boundary, which extends south from Groby Road around the eastern edge of Anstey.</p>	<p>We note your comments in relation to land at land south of Anstey, north and south of Groby Road on the Vision for Charnwood, Areas of Local Separation and Green Wedges, the Settlement Hierarchy and Settlement Limits and the Housing Strategy Options. No decisions have been made at this stage about the preferred approach. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p> <p>We also note the additional information provided.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation.</p>

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	<p>3.3 With the development of St James Gate to the north of Groby Road, the landscape context on the southern edge of Anstey has changed. It is considered that there is scope to accommodate some further growth to the south of Groby Road, either side of the Cemetery without threatening the strategic function or integrity of the wider Green Wedge in this location.</p> <p>3.4 We have included as part of these submissions an indicative concept plan showing how some further development could take place south and north of Groby Road. There is the opportunity to reframe the existing Green Wedge to the south of Anstey to allow for some further growth as part of an urban focused growth strategy.</p> <p>4. SETTLEMENT HIERARCHY AND SETTLEMENT LIMITS TO DEVELOPMENT</p> <p>4.1 The Settlement Hierarchy contained within the Discussion Paper has been informed by a Settlement Hierarchy Assessment (2018). The assessment informs the proposed Settlement Hierarchy as set out in Table 1 to the Discussion Paper.</p> <p>4.2 The proposed settlement hierarchy largely reflects the hierarchy as set out in the adopted Core Strategy, other than the upgrading of Syston to an 'urban settlement', which, along with Birstall and Thurmaston, physically or functionally forms part of a wider Leicester Urban Area.</p> <p>4.3 We have previously made representations arguing that Anstey should more properly be identified as part of the 'Leicester Principal Urban Area', reflecting its strong functional connections with the City, including high quality public transport connectivity.</p> <p>4.4 The Settlement Hierarchy recognises that Anstey has the full range of services and facilities and a strong relationship to Leicester City, with 37% of economically active residents working in Leicester. This is comparable to the larger centres of Birstall, Thurmaston and Syston where between 34 and 44% of residents work in Leicester. The study also recognises the excellent public transport connections the settlement enjoys, with a 15 minute frequency service to Leicester and a 30 minute journey time by bus.</p> <p>4.5 In all these respects, Anstey is as well related to the Leicester urban area as the identified urban settlements of Birstall, Thurmaston and Syston. It appears that its identification as a Service Centre is mainly a reflection of the size of the settlement being similar to the other identified Service Centres.</p> <p>4.6 It is important that the new Local Plan properly recognises the sustainability credentials of settlements, which is largely a function of the services available in the settlement, and proximity to services and facilities in the higher order centres of Loughborough and Leicester.</p> <p>4.7 Due to its strong relationship with Leicester, Anstey represents a more sustainable location for growth than the other identified Service Centres. Whilst physically separate from the City, its functional relationships are as strong as Birstall, Thurmaston and Syston.</p>	

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	<p>4.8 The supporting Sustainability Appraisal recognises these advantages. At Appendix A, the plans illustrating the breakdown of housing alternatives, identifies the edge of Leicester Urban area as encompassing land immediately adjacent to the boundary as well as the wider urban areas of Birstall, Thurmaston and Syston. This shows land to the south of Anstey as part of the Edge of Leicester area.</p> <p>4.9 In reaching conclusions on the appropriate location for future growth, the Council needs to clearly recognise Anstey's strong sustainable credentials due to its connections to Leicester and that it represents a more sustainable location for growth than the other identified Service Centres.</p> <p>5. HOUSING STRATEGY OPTIONS Housing Strategy Options - Growth Scenarios</p> <p>5.1 In terms of housing need and supply, the Discussion Paper states that a minimum of 8,100 homes are needed to flexibly meet the needs in the Borough to 2036 over the commitments outlined in the adopted Core Strategy. This reflects evidence as set out in the Housing and Economic Development Needs Assessment. Paragraph 4.5 of the Discussion Paper indicates a greater supply of land, for up to 15,700 homes, would maximise the potential for maintaining housing supply by providing flexibility to take account of changing circumstances. We support this approach as this would provide necessary flexibility to take account of changing circumstances.</p> <p>5.2 A critical issue that the Discussion Paper fails to address is the extent to which the Council will need to make provision for Leicester's unmet needs. It is understood that a Memorandum of Understanding is being prepared that will establish the extent of the unmet need and the distribution between adjoining local authorities. Evidence available to the Oadby and Wigston Examination indicates that the shortfall could be at least 9,800 dwellings to 2031. This level of unmet need is substantial and so far, the Councils have failed in the Duty to Cooperate to clearly agree a strategy for meeting the level of growth required to 2031 and 2036.</p> <p>5.3 Charnwood is well placed to help meet the City's unmet needs. Given Anstey's strong connections with the City, development to the south of the settlement represents a highly sustainable opportunity to help accommodate future growth requirements including any identified unmet needs from Leicester.</p> <p>5.4 The Councils now need to work with some urgency to reach an agreement on the strategy for accommodating Leicester's unmet needs so that this requirement can be properly factored in to the next stages in the preparation of the new Charnwood Local Plan.</p> <p>Broad Locations for Development</p> <p>5.5 The Discussion Paper outlines seven broad options for growth ranging from a focus on Leicester and Loughborough to a wider dispersed strategy with growth distributed across the settlement hierarchy. The option for a single standalone new settlement is also considered.</p>	

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	<p>5.6 The current spatial strategy as set out in the Core Strategy is one of urban concentration and regeneration. This has generally been successful in directing development to the sustainable locations adjoining Leicester and Loughborough and the more sustainable larger Service Centres.</p> <p>5.7 Given the scale of growth Charnwood will need to accommodate over the plan period to 2036 even without any provision for Leicester's unmet needs, the locational strategy will need to take full advantage of opportunities available for sustainable growth. It is considered that the most deliverable option is likely to include a mix of development focused on the existing urban areas of Leicester and Loughborough, development in smaller new settlements and growth directed to the Service Centres and also the more sustainable rural settlements. Option 6 sets out this approach and is considered to be the most sustainable strategy for growth. In our view the option should also consider options for growth in the more sustainable 'other settlements'.</p> <p>5.8 Development to the south of Anstey would logically form part of this strategy and represent a sustainable growth opportunity adjoining the Leicester urban area to deliver some 420 dwellings. As part of these submissions we have included an indicative masterplan showing how the site could be developed. We have also included Transport Reports prepared by ADC Infrastructure showing how the proposals could deliver a new 'all movement' traffic light junction on the A50 at the Groby Road junction, offering a number of benefits for the local highway network by providing a second access and exit to the village from the A50. Discussions have been held with the Highways Agency and they would not object to the highway solutions proposed.</p> <p>5.9 Depending on the planning strategy selected by the Council, the Highway Authority has indicated that they would need to do further work to assess the potential impacts of the development proposals.</p> <p>5.10 The proposals for development to the south of Anstey should be included as a proposed allocation in the next stages of the Local Plan to help meet identified housing needs over the Plan period.</p> <p>Further documents/information submitted with representation ref: TLP/129</p>	
<p>TLP/130 NHS Property Services Ltd</p>	<p>NHSPS manages, maintains and improves NHS properties and facilities, working in partnership with NHS organisations to create safe, efficient, sustainable and modern healthcare and working environments. NHSPS has a clear mandate to provide a quality service to its tenants and minimise the cost of the NHS estate to those organisations using it. Any savings made are passed back to the NHS.</p> <p>Overview In principle NHSPS, who will henceforth be referred to as 'we' within this response, agree with the comments put forward by Charnwood Council in the 'Towards a Local Plan for Charnwood' document with regards to healthcare and support the document.</p> <p>Our representations: Health Facilities We acknowledge the comments put forward in paragraph 2.37 of the document which states:</p>	<p>We note your comments on NHS Properties and details of health care facilities in Charnwood. We welcome ongoing cooperation in developing our policies. The responses to the consultation will inform the Draft Local Plan which will be published for consultation</p>

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	<p>‘...The Clinical Commissioning Groups which oversee healthcare in the Borough have confirmed a preference for funding to improve existing practices rather than see new facilities as part of larger sites. We will work with the local education authority and the clinical commissioning group to understand the relationship growth has with their services and what this means for preparing a development strategy.’</p> <p>Healthcare facilities are essential infrastructure and where new or improved facilities are required, they should be delivered alongside additional housing units to mitigate the impact of population growth on existing infrastructure. The authority should continue to work with NHS commissioners and providers to consider the quantum and location of healthcare facilities that will be required to ensure that new housing growth is sustainable.</p> <p>Similarly, much surplus NHS property is outdated and no longer suitable for modern healthcare or other C2 or D1 uses without significant investment. Where NHS commissioners can demonstrate that healthcare facilities are no longer required for the provision of services, there should be a presumption that such sites are suitable for other appropriate uses (including housing), and should not be subject to restrictive policies or periods of marketing.</p> <p>Baxter Gate Opportunity Site NHS Property Services Ltd is the Freehold Owner of the Loughborough Health Centre Site off Pinfold Gate. We note that this site (known as Baxter Gate) was identified as a key opportunity site within the Loughborough Town Centre Masterplan 2017:</p> <p>“Baxter Gate: Deliver a mixed-use retail led scheme on this site delivering a combination of new retail units, residential, a health centre and a new town centre car park together with enhanced connectivity”</p> <p>All NHS organisations are looking to make more effective use of the health estate and support strategies to reconfigure healthcare services, improve the quality of care and ensure that the estate is managed sustainably and effectively. We are constantly reviewing our sites, and we would support further engagement with the Council on this matter as part of the Local Plan preparation.</p> <p>NHS PS would welcome any further discussion on these matters. We look forward to receiving confirmation that these representations have been received. Should you have any queries or require any further information on the enclosed, please don't hesitate to contact me.</p>	
<p>TLP/131 Andrew Hiorns Town Planning Ltd on behalf of Parker Strategic Ltd</p>	<p>In response to your publication of the above document, we are pleased to make this short representation in relation to an additional site which we consider suitable for development that has not been considered in the Local Plan review to date as far as we are aware. We provide details of the site below and we would be grateful if you would consider the site for development as the Local Plan Review process moves forward.</p> <p>The representation is made by Parker Strategic Land Limited. Further representations are made on</p>	<p>We note your comments and information in relation to land at Scraftoft. No decisions have been made at this stage about the preferred approach. The suitability of all sites for inclusion in the Draft Local Plan will be</p>

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	<p>behalf of Parkers in relation to the discussion document as a whole and other specific sites by others, and we ask for this representation be taken into account alongside those representations.</p> <p>Parkers are a family-owned company, whose original business is founded on farming some 5,200 hectares (13,000 acres) of land throughout the Midlands and the East of England. The company was formed in 1904 in Leicester and is now managed by the fourth generation of the family, with farming remaining a large part of the business. Parkers has in the past brought forward developments in and around Leicestershire, including sites in Aylestone, Braunstone, Thorpe Astley, Market Harborough and Loughborough together with several sites in Essex and Norfolk. Parker Strategic Land was established in 2016, to help manage potential development opportunities on Parker's own land and to acquire and promote other development. In Charnwood, Parker Strategic Land have promoted sites in South Loughborough at Ling Road and Allendale Road, which are currently being developed out.</p> <p>Land at Scraftoft</p> <p>The land we propose to be considered is located to the north of Scraftoft and the east of the existing urban area of the city. We have attached a site plan. The site currently forms an extension to the Scraftoft Golf Club (which is mostly within Harborough District) and forms two golf holes with strong boundary planting to the northern and eastern edges, with a less developed hedge to the west. The site slopes from west to east and from south to north and has a field drain along the eastern hedge boundary and an attenuation pond constructed as part of the golf course in the south-east corner of the site. The site is accessed through the existing golf course and has farm buildings (Lodge Farm) beyond the site along the eastern boundary. As the site has been developed as a golf course, it is largely mown grass and we are not aware of any major constraints affecting development. Surveys of the trees and ecology are currently underway and we can report the findings when we have these as far as they are relevant to this site.</p> <p>Harborough District Council has allocated the existing golf course land and further land to the south of the site for residential-led development as the Scraftoft North Strategic Development Area, in the Harborough Local Plan 2011-2031, Proposed Submission Version September 2017. We have attached the relevant Policy SC1 and an extract from the Proposals Plan showing the allocation. The allocation is for 1,200 new homes, a local centre, health centre, community facilities and a 2-form entry primary school. The Local Plan Hearing we understand, will be in October 2018.</p> <p>Parker Strategic Land are promoting the allocation site in conjunction with the Scraftoft Golf Club and Leicester City Council, who own part of the site. The Golf Club will relocate to a new course the Club are constructing on land alongside the village of Houghton-on-the Hill in Harborough, which is allocated for this use in the Submission Version Local Plan, also under Policy SC1. The existing club will relocate to the new course in 2022 and the site will then be redundant.</p> <p>Work is now well underway in assessing the development of the Strategic Development Area site and</p>	<p>assessed thoroughly, having regard to the full range of planning considerations.</p> <p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation</p>

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	<p>we are preparing the master plan and related detailed design work. The council's trajectory looks for houses to be delivered on the site by 2021/2022. In the studies to date, we have considered uses for the land including new homes, recreation and open space uses.</p> <p>The land we propose is contiguous with the allocated site and forms a parcel of some 5.2 hectares gross. The woodlands and pond area reduce the likely net developable area to approximately 3.3 hectares. In our view the site might accommodate lower density development and some open space uses associated with the wider development, and so might accommodate 60-80 new homes of various sizes, including bungalows. The site would be accessed through the redeveloped golf course with a connection to the proposed internal street system with a link back to Beeby Road with other links to Hamilton Lane/Keyham Lane West and to New Romney Crescent in the south. The proposed site would therefore form part of the wider development and be connected to shops and other local facilities including the new school. Shops are already available in the village and Hamilton College secondary school is alongside Hamilton Lane and within walking distance to the site.</p> <p>The site will be available from 2022 when the site is vacated by the golf club. The proposed phasing of the Strategic Development Area will see early phases of the site developed from the east and off Beeby Road. Development of this site would be possible from around 2024 onwards. We would expect the site to accommodate around 40-50 dwellings constructed each year, so around 2-3 years for development of the site.</p> <p>As the site currently forms part of the golf course and is contiguous with the proposed development area and largely free of constraints, we consider the site has good potential to accommodate a modest number of new dwellings brought forward as part of the comprehensive master plan for the allocated Strategic Development Area site, and we trust you will be able to consider the site in your deliberations as your Local Plan moves forward.</p> <p>Further documents/information submitted with representation ref: TLP/131</p>	
<p>TLP/132 Astil Planning on behalf of owners 55 Main Street, Ratcliffe on the Wreak</p>	<p>1.0 Introduction</p> <p>1.1 We are writing on behalf of our client, the owner of the above site, in response to Charnwood Borough Council's 'Towards a Local Plan for Charnwood Consultation'.</p> <p>1.2 One of the main questions that featured in the 'Towards a Local Plan for Charnwood Consultation' was:</p> <p><i>Can you put forward any additional land that is available for development that has not been identified in the Council's Strategic Housing Land Availability Assessment?</i></p> <p>1.3 The purpose of this written submission is to put forward the land adjacent to 55 Main Street, Ratcliffe on the Wreak for residential development.</p>	<p>We note your comments and information in relation to land at Ratcliffe on the Wreak. No decisions have been made at this stage about the preferred approach. The suitability of all sites for inclusion in the Draft Local Plan will be assessed thoroughly, having regard to the full range of planning considerations.</p>

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	<p>1.4 We are aware that the consultation ended on Thursday 7 June 2018. However, discussions with policy officers have suggested that the Council is still in a position to accept submissions to the consultation. Therefore, whilst we understand that the analysis of the consultation responses has already begun, we would appreciate it if you would factor these comments into the planmaking process.</p> <p>2.0 The Site</p> <p>2.1 The site is located immediately adjacent to the existing built form of Ratcliffe on the Wreake and measures 0.496 hectares in extent. It is bound by agricultural fields to the northeast, Main Street to the southeast, 55 Main Street and associated grounds to the southwest (in our client's ownership) and a field to the northwest west (also in our client's ownership). Drawing P/A1447/05/01 (Site Location) shows the site in its wider locational context.</p> <p>2.2 The site currently comprises of a grass field with hedgerows and trees along the northeast, southeast and southwest boundaries.</p> <p>2.3 Vehicular access to the site is currently provided to the site via a gated entrance located just off Main Street in the southern corner of the site.</p> <p>2.4 The Settlement Hierarchy Assessment identifies Ratcliffe on the Wreake as having access to several recreational, leisure and community facilities (village hall, St Botolph's Church and formal sports provision at Ratcliffe College) along with pre-school provision at Ratcliffe College Nursery. Additionally, the Settlement Hierarchy Assessment considered the village to have good secondary school access.</p> <p>2.5 Ratcliffe on the Wreake is located approximately 10.8 kilometres southeast of Loughborough Town Centre and 11 kilometres northeast of Leicester City Centre. The A46 runs in close proximity to the village and connects to the wider strategic road network which provides access to both these areas.</p> <p>2.6 With respect to public transport, the 128 bus service, which runs between Leicester and Melton Mowbray, stops in the village at two hourly intervals during the daytime (Monday to Saturday) and can be accessed from bus stops located approximately 450 metres from the site on Main Street.</p> <p>2.7 The southern corner of the site is located adjacent to the Ratcliffe on the Wreake Conservation Area. However, there are no listed buildings within the immediate vicinity of the site.</p> <p>2.8 The Environment Agency's Flood Map for Planning indicates that the site is situated within Flood Zone 1 and thus has a low probability of flooding.</p> <p>3.0 The Proposed Allocation</p> <p>3.1 It is proposed that the site is allocated for the development of up to 10 residential units. 3.2 A new vehicular access to the site would be provided directly from Main Street.</p>	<p>The responses to the consultation will inform the Draft Local Plan which will be published for consultation</p>

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	<p>4.0 The Housing Supply Context</p> <p>4.1 The Leicester and Leicestershire Housing & Economic Development Needs Assessment 2017 (HEDNA 2017) establishes an Objectively Assessed Housing Need of 994 dwellings per annum for Charnwood between 2011 and 2036, which equates to a total of 24,850 new homes over the plan period.</p> <p>4.2 In contrast, the Housing Delivery Study, which forms part of the evidence base for the new Charnwood Local Plan, reports that an average of 710 dwellings have been delivered per annum over the last six years within the Borough. There is therefore a significant disparity between the Objectively Assessed Housing Need for Charnwood and the current levels of delivery.</p> <p>4.3 The Housing Delivery Study also concludes that in order for the Borough to meet its Objectively Assessed Housing Need and address the backlog in housing delivery since 2011/12, 1,136 homes need to be delivered in Charnwood per annum. This equates to “an increase in the annual rate of housing delivery of approximately 60% over a sustained period”.</p> <p>4.4 It is therefore paramount that an adequate amount of additional sites, which have a good prospect of coming forward for residential development over the plan period, are allocated for housing in the new Local Plan.</p> <p>4.5 Additionally, given the complexity involved with delivering housing on large strategic sites, the Towards a Local Plan for Charnwood Discussion Paper highlights the importance of allocating a wider variety of sites to create flexibility in housing delivery and account for changing circumstances over the plan period.</p> <p>4.6 The Discussion Paper sets out that to achieve a rate of housing delivery that meets housing needs over the plan period, land will be required for between 8,100 homes (minimum) and 15,700 homes (higher growth scenario). It also points to the fact that there is a lack of capacity to meet this housing need on brownfield sites alone. Ultimately, this means that the new Local Plan will need to allocate greenfield sites for residential development.</p> <p>5.0 Justification</p> <p>5.1 This section will assess the proposed allocation of the site for residential development under the following headings:</p> <ol style="list-style-type: none"> 1. Sustainability 2. Emerging policy concerning small sites 3. Affordable housing 4. Location of the site in relation to the existing built form 5. Deliverability 6. Landscaping 	

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	<p>7. Access</p> <p>1) Sustainability 5.2 Developing the site for housing would make a positive contribution towards achieving the three dimensions of sustainable development as set out in paragraph 7 of the NPPF:</p> <p>Economic 5.3 Through increasing the number of residents living in the village, the proposed development will help to support local services and facilities. This also has the potential to create economic opportunities for local businesses.</p> <p>5.4 Additionally, construction jobs will be created during the development of the scheme, which is likely to create further opportunities for local firms.</p> <p>Social 5.5 The development of up to 10 dwellings on the site will make a positive contribution towards achieving the challenging housing delivery targets that Charnwood Borough Council will be required to meet over the plan period.</p> <p>5.6 The mix and type of the housing that is delivered on the site would help to meet local housing needs.</p> <p>Environmental 5.7 There is the potential to incorporate measures into the design of the scheme which could enhance the ecological value of the site and deliver a net gain to biodiversity.</p> <p>2) Emerging policy concerning small sites 5.8 In recognition of the important contribution that small sites can make towards meeting the housing requirements of an area, the Housing White Paper 2017 highlighted the Government's ambition to "bring more small sites forward for development". This policy aspiration was translated into paragraph 69(a) of the draft revised NPPF, which indicates the Government is likely to require local planning authorities to "ensure that at least 20% of the sites identified for housing in their plans are of half a hectare or less". The Consultation Proposals document that was published alongside the draft revised NPPF stated that paragraph 69 is designed to "encourage greater use of small sites, to help diversify opportunities for builders and increase the number of schemes that can be built-out quickly".</p> <p>5.9 As the site in question measures 0.496 hectares in extent, it would qualify as a small site based on the emerging definition published in the draft revised NPPF.</p> <p>5.10 The Housing Delivery Study also makes the following statements in support of allocating more</p>	

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	<p>small sites across Charnwood:</p> <ul style="list-style-type: none"> • <i>“...Releasing more large sites alongside a good mix of smaller and medium sized sites will be essential if the Borough is to have the best possible chance of meeting its housing need.”</i> (paragraph 1.4) • <i>“...we have identified a shortfall in short term land supply within the Borough, primarily due to the lead-in times associated with bringing forward large sites...”</i> (paragraph 1.7) • <i>“...small and medium sites are able to be brought forward quickly to fill in demand “gaps”. This reflects the inherently more dynamic and responsive nature of smaller sites compared with large sites with long lead in times and more significant infrastructure requirements”</i> (paragraph 8.10) • <i>“...recognising that there may be a shortfall of delivery from previous years, we assumed that developers of small and medium sites would cater for this backlog of demand, ensuring that they chose sites significantly different in location and specification to delivery at large sites at that time...”</i> (paragraph 8.11) <p>5.11 In response to these findings, the Discussion Paper highlights that allocating a wider variety of sites for housing will help to create flexibility in housing delivery; account for changing circumstances over the plan period; and ensure that the housing needs of a wider variety of residents are met. From this, it can be taken that allocating more small sites for residential development, such as the land adjacent to 55 Main Street, in the new Local Plan will play a significant role in boosting the Borough’s housing delivery in a manner that is more responsive to local housing needs. Given the pressing need to significantly boost housing supply in Charnwood, this weighs heavily in favour of allocating the site in question for housing.</p> <p>5.12 In light of the above factors, it is considered that allocating the land adjacent to 55 Main Street for residential development would accord with the general thrust of emerging national and local planning policies regarding housing development on small sites.</p> <p>3) Affordable housing</p> <p>5.13 The land adjacent to 55 Main Street is being put forward for the development of up to 10 dwellings. Thus, it may not need to make a contribution towards affordable housing based on the policy set out in the Written Ministerial Statement (WMS) of 28 November 2014. Notwithstanding this, there is the potential to incorporate an element of affordable housing.</p> <p>5.14 Additionally, if some affordable housing was provided on the site, this would set it apart from many of the other small sites that are being promoted for residential development in the Borough because the capacity of these alternative sites is likely to exempt them from being required to provide affordable housing. Therefore, the site in question could represent a rather unique opportunity to deliver some affordable housing on a small site.</p>	

RESPONSE NO/ CONSULTEE	RESPONSES	OFFICER COMMENTS
	<p>4) Location of the site in relation to the existing built form</p> <p>5.15 The site is situated immediately adjacent to the existing built form of Ratcliffe on the Wreake. It is therefore considered to represent a logical location for the expansion of the village. Additionally, the northwestern boundary of the site has been sensitively positioned to ensure that it does not extend beyond the footprint of the buildings located at 55 Main Street. As a result, the developed area of the site will not protrude beyond the existing line of built development in the northwest of the village. This will help to integrate the scheme into the local built and natural environment.</p> <p>5.16 Moreover, by virtue of its location immediately adjacent to 55 Main Street, the site is located in closer proximity to the concentration of development in the village compared to numbers 82 and 84 Main Street, which are located circa 250 metres away from the edge of the built form on the southern side of Main Street (54 Main Street) and 190 metres from the edge of the built form on the northern side of Main Street (55 Main Street). As a result, it is not considered that the residential development of the site would be out of character with the pattern of development in Ratcliffe on the Wreake.</p> <p>5) Deliverability</p> <p>5.17 The Discussion Paper highlights that there needs to be a “realistic prospect of housing sites identified for the first five years being built and a reasonable prospect that sites identified for six years onwards will come forward”.</p> <p>5.18 The importance of this is increased by the Government’s recent proposals for the Housing Delivery Test, which from 2020 is likely to result in the presumption in favour of sustainable development being applied where housing delivery is below 75% of the authority’s housing requirement over the previous three years.</p> <p>5.19 Footnote 11 of the NPPF states</p> <p><i>“To be considered deliverable, sites should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years and in particular that development of the site is viable”</i></p> <p>5.20 Table 1 assesses the site against the tests of suitability, availability and achievability in accordance with the criteria set out in the National Planning Practice Guidance and the Leicester and Leicestershire HMA Housing and Economic Land Availability Assessment Methodology Paper 2016. This demonstrates that the land adjacent to 55 Main Street has the potential to be deliverable within the 0-5 year timeframe, subject to its allocation in the new Local Plan. Given the pressing need to increase housing supply within the Borough, the deliverability of the site should be given significant weight in the plan-making process.</p>	

Table 1: Assessment of whether the land adjacent to 55 Main Street, Ratcliffe on the Wreake is deliverable

Deliverability Criteria	Assessment
Suitability	<p>The site is considered to be suitable because:</p> <ul style="list-style-type: none"> It is not subject to any known physical limitations in terms of access, infrastructure, ground conditions, flood risk, hazardous risks, pollution or contamination; The scheme could be sensitively designed to have a positive relationship with the surrounding landscape and the Ratcliffe on the Wreake Conservation Area; It is an appropriate and attractive location for residential development; It is not envisaged that the proposed residential development of the site would give rise to any adverse environmental or amenity impacts on future occupiers of neighbouring areas; and The <i>Settlements Hierarchy Assessment</i>, which forms part of the evidence base for the new local plan, identifies Ratcliffe on the Wreake as one of the highest scoring Small Villages or Hamlets in terms of the local service provision and facilities.
Availability	<p>The whole site is owned by our client and there are no known legal or ownership problems associated with the residential development of the land. Given the landowner's intentions for residential development to take place on the site, it is considered to be available for housing.</p>
Achievability	<p>The landowner intends to secure the delivery of a residential scheme on the site. Given the proposed capacity of the site (up to 10 dwellings), there is considered to be a realistic prospect of the site being built out for housing in the 0-5 year timeframe.</p>

6) Landscaping

5.21 The section of the field that lies beyond the developed footprint of 55 Main Street will remain undeveloped and does not form part of the proposed allocation. This will help to create a soft transition between the edge of the built development on the site and the countryside. Additionally, there is the scope to introduce additional tree planting along the boundaries of the site which will help to screen views of the development from the nearby fields. These design features should facilitate the successful integration of the proposed development into the natural environment by enabling the new properties to sit comfortably within their landscape setting.

5.22 High quality soft landscaping could also be integrated into the design of the scheme which would provide the opportunity to enhance the ecological value of the site and deliver a net gain in biodiversity.

7) Access

5.23 A new vehicular access to the site would be provided from Main Street. 5.24 By virtue of its location in Ratcliffe on the Wreake, the site also benefits from being well connected to the A46 and the strategic road network.

RESPONSE NO/ CONSULTEE	RESPONSES	OFFICER COMMENTS
	<p>6.0 Conclusion</p> <p>6.1 This written submission has been prepared in support of allocating the land adjacent to 55 Main Street, Ratcliffe on the Wreake for residential development in the new Local Plan for Charnwood.</p> <p>6.2 In summary, the following salient points have been raised in relation to the proposed allocation:</p> <ul style="list-style-type: none"> • The residential development of the site would make a positive contribution towards achieving the three dimensions of sustainable development • The site measures 0.496 hectares. Thus, it qualifies as small site based on the emerging definition of small sites published in the draft revised NPPF. The site would therefore help Charnwood to achieve the 20% small sites target set out in the draft revised NPPF, should it be carried forward into the revised NPPF later this year. • The Housing Delivery Study found that smaller sites are able to be brought forward more quickly for residential development as they are inherently more dynamic and responsive compared to larger sites. Additionally, the site is considered to be deliverable within the 0-5 year timeframe. Therefore, allocating it for housing would make a positive contribution towards addressing the Borough's shortfall in short term housing land supply that is identified in the Housing Delivery Study. • There is the potential to provide an element of affordable housing on the site. • The site is situated immediately adjacent to the existing built form of Ratcliffe on the Wreake and therefore represents a logical location for the expansion of the village. • The new housing could be developed in a sensitive manner to facilitate its successful integration into the natural environment and local landscape setting. • A new vehicular access to the site could be provided from Main Street. <p>6.3 In light of the above factors, it is concluded that the site should be allocated for residential development in the new Local Plan for Charnwood.</p> <p>Further documents/information submitted with representation ref: TLP/132</p>	

Next Steps

The responses will now be used to inform the evidence base studies and options development that will be undertaken as part of preparing a draft plan for further consultation later this year. This will include further engagement with infrastructure providers and key stakeholders.

APPENDIX A – LIST OF CONSULTEES INVITED TO COMMENT

Action Deafness
Action for a Better Charnwood
Action for Hearing Loss
Adlington
Advance Housing and Support Ltd
Affiniti Integrated Solutions Limited
Affinity Water Limited
Age UK, Leicester Shire & Rutland
Airband Community Internet Limited
Airwave Solutions Limited
All Saints Residents Association (Shepshed)
Andrew Granger & Co. LLP
Andrew Hiorns Town Planning
Andrew Martin Associates
Anglian Water Services Ltd
Anstey Library
Antony Aspbury Associates
AQ Ltd
Arcus Consulting Services Ltd
Arqiva Communications Ltd
Arriva Midlands
Arriva plc
Arts Council England (East Midlands Arts)
Ashby Road Estates Community Association
AT&T Global Network Services (UK) B.V.
Atlas Communications NI Ltd
Aylesbury Vale Broadband Ltd
Bangladesh Social Association
Bardon Parish Meeting
Barkby & Barkby Thorpe Action Group
Barkby & Beeby Womens Institute (WI)
Barratts
Barrow Library
Barrow Voice
Barton Willmore
BBC Radio Leicester
Bell Cornwell
Belton Parish Council
Bidwells
Birstall & Wanlip Neighbourhood Watch
Birstall Library
Birstall Post
Blaby District Council
Bloor Homes Midlands
BNP Paribas Real Estate UK
Bolt Pro Tem Ltd
Boundless Networks Ltd
Bovis Homes Ltd
Boyer Planning
Bristol Water Plc

British Democratic Party
British Geological Survey
British Telecommunications plc
Broadband for the Rural North Ltd
Broughton & Dalby Parish Council
Building Relationships
Burnett Planning
Bytel Networks Ltd
Cadent (Gas)
Calico Quays Ltd
Call Flow Solutions Ltd
Cambridge Fibre Networks Ltd
Canal & River Trust
Carter Jonas LLP
CEG
Central North Sea Fibre Telecommunications Ltd
Centric Telco Ltd
Cerda Planning Ltd
Charles Church (North Midlands) Limited
Charles Lowe and sons/Generations
Charley Parish Council
Charnwood Arts
Charnwood Bangladeshi Society
Charnwood Borough Council
Charnwood Carers
Charnwood Conservative Association
Charnwood Disability Forum
Charnwood Shelter Group
Charnwood Together
Charnwood Tree Trust
Chilton Strategic Land
Churches Together in Loughborough
City Screen Printers UK) Ltd
CityFibre Metro Networks Ltd
Citygrove Securities Plc
CityLink Telecommunications Ltd
Civil Aviation Authority
Cogent Communications UK Ltd
COLT Technology Services
Commercial Estates Group
Community Fibre Ltd
Concept Solutions People Ltd
Cornerstone Telecommunications Infrastructure Ltd
Costock Parish Council
County Broadband Ltd
CPRE - Charnwood District
CPRE Leicestershire
CTIL

Cyclist Touring Club
D J Deloitte
David Wilson Homes East Midlands
Davidsons Development Limited
De Montfort University
Define
Department for Communities and Local Government (DCLG)
Department for Work & Pensions
Department of Constitutional Affairs
Department of Transport
Derbyshire Gypsy Liaison Group
Derwent Living
Design Council - CABE
Dev Plan
Dialogue
DLP Planning Consultants
E A Lane & Sons
East Goscote Library
East Leake Parish Council
East Leicestershire & Rutland Clinical Commissioning Group
East Midlands Airport
Education & Skills Funding Agency
EE Ltd
Eircom UK Ltd
EMH Group
Emmanuel Church
Energis Communications Ltd
Environment Agency
Equality Action
Equality and Human Rights Commission
EU Networks Fiber UK Ltd
Euro Payphone Ltd
Eurobell Ltd
Fairhurst
Faulks, Perry, Culley & Rech
Fearon Community Association
FFR Ultrasonics Ltd
FibreSpeed Ltd
Fibrewave Networks
Firstplan
Fisher German LLP
Fisher Scientific UK Ltd
FLAG Atlantic UK Ltd
Forest Road North & Holywell Drive Area Residents Group (FRHARG)
Forestry Commission
Fox Bennett
Fox Strategic Land & Property
Foxpark Limited
Framptons
Friends of Charnwood Forest

Fujitsu Services Ltd
G R Planning Consultancy Ltd
G. Network Communications Ltd
Gaddesby Parish Council
Gamma Telecom Holdings Ltd
Garendon Park & Countryside Protection Group
Geeta Bhawan
GeneSYS Telecommunications Ltd
Geo Networks Ltd
Geoffrey Prince
Gerald Eve LLP
Gigaclear Plc
Gladmans Development
Glenfield Parish Council
Gorse Covert Community Association
Great Central Railway plc
Groby Parish Council
GVA
GVA Grimley
Haddon Way Residents Association
Hallam Land Management
Hamilton Community College
Hamilton Library
Hanover Housing Association
Hanson UK
Harborough District Council
Harris Lamb
Hastings Community Association
Hastings Residents Association
Hathern Library
Hawksmoor
Haydon Road Residents Association
Heaton Planning Ltd
Help the Aged
Henry Davidson Developments Ltd
Herrick Road Area Residents Group
Hibernia Express (UK) Ltd
Hickling Parish Council
Highlands and Islands Enterprise
Highways Agency
Highways England
Hinckley & Bosworth Borough Council
Historic England
Hoby with Rotherby Parish Council
Hollins Strategic Land LLP
Holmes Antill
Home Builders Federation Ltd
Homes England
Howkins & Harrison
Hungarton Parish Council
Hutchison 3G UK Ltd
HWRA (Haddon Way Residents' Association)

Hyperoptic Ltd
In Focus Public Networks Ltd
Independent Fibre Networks Ltd
Indigo Planning Ltd
Inland Waterways Association
Internet Central Ltd
Internet Connections Ltd
Interoute (i-21 Ltd)
IX Wireless Ltd
Jas. Martin & Co
Jelson Limited
John Martin & Associates
John Storer Charnwood
KCOM Group Plc
Kegworth Parish Council
Keyham Village Meeting
Kinchbus
King Sturge
Kingfisher Area Residents Group (KARG)
Kirkwells Town Planning Consultants
Knight Frank
KPN EuroRings B.V.
Lancaster University Network Services Ltd
Landesign
Landmark Planning Limited
LCPT
Leicester & Leicestershire Enterprise Council
Leicester Audi
Leicester City Council
Leicester Diocesan Board of Finance
Leicester-Shire & Rutland Sport
Leicestershire Bridleways Association
Leicestershire Campaign for Better Transport
Leicestershire Centre for Integrated Living
Leicestershire Constabulary
Leicestershire County Council
Leicestershire County Council
Leicestershire County Council - Environment & Transport
Leicestershire Fire & Rescue Service
Leicestershire Food Links Ltd
Leicestershire Footpaths Association
Leicestershire Local Access Forum
Leicestershire Waste Partnership
Leics & Rutland Assoc of Local Councils
Level 3 Communications UK Ltd
LHA-ASRA Group
Lib Dem Local Branch
Lichfields
Local Enterprise Partnership
Long Whatton & Diseworth Parish Council
Longhurst Group
Loughborough & District Cycle Users

Campaign
Loughborough Churches Partnership
Loughborough Conservative Association
Loughborough Conservatives
Loughborough Council of Faiths
Loughborough Echo Newspaper
Loughborough Endowed Schools
Loughborough Gospel Halls Trust
Loughborough Jansari Centre
Loughborough Library
Loughborough Mosque & Islamic Cultural Association
Loughborough Naturalists' Club
Loughborough South West Action Group
Loughborough Students Union
Loughborough Town Centre Partnership
Loughborough United Reformed Church
Loughborough University
Loughborough Urban Forum
Love Loughborough BID Company Ltd
Lowesby & Cold Newton Parish Meeting
LRRCC
LSWAG
M & S Solicitors
Manor Farm Community Group
Marcus Bates Ltd
Marine Management Organisation
Mariners Quay Residents Association
Markfield Parish Council
Marrons
Martin Robeson Planning Practice
Mather Jamie Ltd
Maximus Networks Ltd.
Melton Borough Council
Merton College
Metropolitan Development Services
Metropolitan Housing Trust
Midland Heart
Midlands Rural
Miller Homes
Ministry of Defence Estates
MLL Telecom Ltd
Montague Evans
Morris Homes
Mountsorrel Library
MS3 Networks Ltd
Nanpantan Residents' Network (NRN)
Nathaniel Lichfields & Partners
National Farmers' Union, (East Midlands)
National Federation of Gypsy Liaison Groups
National Forest Company
National Grid
National Trust

Natural England
Neighbourhood Watch (Thurmaston)
Neos Networks Ltd
Network Rail
Network Rail (Property)
Network Rail Infrastructure Ltd
Network Rail Property
NextGenAccess Ltd
NHS Leicestershire & Rutland
Normanton on Soar Parish Council
North West Leicestershire District Council
Northumbrian Water Ltd
Nottingham Community Housing Association
Nottinghamshire County Council
Npower Ltd
NWP Street Ltd
NWRG
O2 (UK) Ltd
Oadby & Wigston Borough Council
Open Network Systems Ltd
OPUN
Orange Personal Communication Services Ltd
Oxalis Planning
Parkers of Leicester Ltd
Peacock and Smith Ltd
Peatfield Associates
Pegasus Group
Pegasus Planning Group
Persimmon Homes
Persimmon Homes & Charles Church
Persimmon Homes Notts
Planinfo
Planning and Design Group
Planning Potential Ltd
Planware
Planware Ltd
Polish Community Centre
Powergen
Pro Vision Planning & Design
Protection of Wildlife in Charnwood
Queniborough Gazette
Quickline Communications Ltd
Quorn Library
Ramblers Association
Rawlins Academy
Reach Europe Ltd
Redrow Homes East Midlands Ltd
Reminiscences Group
Rempstone Parish Council
rg+p Ltd
Richborough Estates Ltd,
Riverside Housing

RNIB Vocational College
Road Haulage Association
Roger Tym & Partners
Rothley Conservative Party
Rothley Library
Roundabout Magazine
Royal Mail Estates Ltd
Royal Mail Properties
Royal National Institute for Deaf People
RPS Planning & Development
Rushcliffe Borough Council
Rutland County Council
Savills
Scott Brownrigg
Scottish Water
Scraptoft Parish Council
Sea Fibre Networks Ltd
Seagrave Parish Magazine
Sedgwick Associates
Serco UK&E Local Regional Government
Severn Trent Water Ltd
Shelthorpe Community Association
Shepshed Countryside Protection Group (SCPG)
Shepshed Library
Shree Ram Krishna Community Association
Sidings Park Residents Association
Signet Planning
Sikh Temple
Sileby Library
SIP (Industrial Products) Ltd
Sky Telecommunications Services Ltd
Smallworld Media Communications Ltd
Solway Communications Ltd
South East Water Plc
South Notts Bus Company Limited
South West Water Ltd
Sport England
Sprintlink UK Ltd
Spyder Facilities Ltd
Sri Niketan Cultural Association
SSA Planning Limited
SSE Telecommunications Ltd
St Michael's Church
St Peters Community Association
Stanford on Soar Parish Council
Stansgate Planning Consultancy
Stonewater Ltd
Straw & Pearce
Subtopia Ltd
Surf Telecoms Ltd
Sutton and East Surrey Water Plc
Sutton Bonington Parish Council

Syston & District Labour Party
Syston Library
TalkTalk Communications Ltd
Tata Communications (UK) Ltd
Taylor Wimpey
Telefonica UK Ltd
Telensa Ltd
Telewest Ltd
TeliaSonera International Carrier UK Ltd
TES (Shepshed) Ltd
Tetlow King Planning
Thames Water Utilities Ltd
The Abbeyfield Loughborough Society
The Bridge Housing Association
The Coal Authority
The Crown Estate
The Garden Centre Group
The Garden Trust
The Long Furrow Community Magazine
The Mobile Operators Associations (MOA)
The Planning Inspectorate
The Prince's Trust EM Regional Office
The Sirius Group
The Theatres Trust
The Wireless Infrastructure Company Ltd
The Woodland Trust
Three
Thruxington Life
Thurcaston Action Group (TAG)
Thurmaston Library
Thurmaston Park Trust
Thurmaston Times
Thus plc
TIBUS
Timico Partner Services Ltd
Tiscali UK Ltd
Transco Plc
Travis Baker Transport Planning Ltd
Trent Barton
Truespeed Communications Ltd.
Trustees - De Lisle Family Fund (Garendon Estate)

Turley Associates Ltd
Twyford and Thorpe Parish Council
UK Broadband Ltd
United Utilities Plc
Upper Broughton Parish Council
Urgo Ltd
Valuation Office Agency
Verizon UK Ltd
Viatel Infrastructure (UK) Ltd
Virgin Media Ltd
Vodafone and O2
Vodafone Ltd
Voneus Ltd
Vtesse Networks Ltd
WarwickNet Ltd
WDA Planning Ltd
Welbeck - The Defence Sixth Form College
Wessex Water Services Ltd
West Cross Lane Fields Residents Group
Western Power Distribution
Westleigh Developments Limited
Wifinity Ltd
Wightfibre Ltd
Wildcard UK Ltd
William Davis Ltd
Willoughby on the Wolds Parish Council
Woodthorpe Residents Association
Wyevale Garden Centres
Wysall & Thorpe in the Glebe Parish Council
Yorkshire Water Service Ltd
Zayo Group UK Ltd
All Borough Councillors
All Parish Councils
Members of the Public on Database