

Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation

RESPONSES FROM	CHAPTER	PAGE NO	COMMENT
Environment	2	10	Section on Environment – Include the % of Rights of Way with Ease of Access.
ENV	3	12	Key Challenges - there is not just the challenge from the impacts of climate change there is also the challenge of taking the actions needed to avoid the worst effects of climate change (ie, by reducing emissions, increasing carbon sequestration etc) by reducing energy demand, changing to renewable forms of energy, low / zero carbon transport / mobility solutions, increasing energy efficiency etc. Addressing this challenge will reduce the need to put time, money and effort into dealing with the impacts of climate change. Taking action on this should also create new economic and employment opportunities for the area. Plan needs to reference the full challenge of climate change.
ENV	3	12	Vision – ‘Development will have been managed to improve the economy, quality of life and the environment.’  Putting the environment last can imply that it is the least important of the list. Increasing recognition that unless we address the environmental issues (climate change, biodiversity loss, resource scarcity) there won’t be an economy to develop or much in the way of a quality of life. If CBC has declared a climate emergency, then it would make sense to put this at the fore of the vision.
ENV	3	12	Vision - delivering growth to a high design quality that benefits our communities.’  May be picked up elsewhere but could include reference to low/zero carbon, more environmentally sustainable development. Or add ‘that benefits our communities and the environment.’  Also opportunity when talking about the types of homes to reference that all new homes will be low carbon in line with forthcoming Future Homes Standard and proposed changes to the NPPF.
ENV	3	12	Change the sentence to ‘Regeneration capitalises on industrial heritage including the Great Central Railway and the Grand Union Canal’
ENV	3	13	Vision – planting trees will only have a small effect on reducing Charnwood’s GHG emissions. Will need more fundamental changes to local economy, energy systems,

**Leicestershire County Council Response to Charnwood Borough Council's Draft Charnwood Local Plan (2019-36)**  
**Preferred Option consultation**

			housing, transport and industry. Bit disingenuous to imply that it can be particularly addressed by planting trees and maintaining woodlands.
ENV	3	13	Development Strategy – opportunity to mention Ultra Low and Low carbon transport / mobility solutions.
ENV	3	13	Development Strategy – will need to go beyond ‘seeking high environmental standards in new development’ – will need to require it – at least to level of Future Homes Standard and future NPPF.
ENV	3	13	Next to attractive opportunity to mention the word ‘green’. This would cover aspirations to ensure that the town is green, addresses any considerations of air quality and opportunities for biodiversity and combat climate change such as the likelihood of urban heating and flooding.
ENV	3	13	Society – doesn’t make reference to the health impacts from pollution caused by vehicles, housing, businesses and industry – addressing pollution should also be crucial for supporting healthy communities.
ENV	3	14	Add improve permeability of landscape for species.
ENV	3	14	Environment – is it enough to just ‘seek to deliver biodiversity gain’? It is a legal requirement of development
ENV	3	14	Economy – possible opportunity to make reference to ‘green / low carbon industry’ as a sector to encourage in the area
ENV	3	15	Item 5 add in the word ‘appropriate’ tree planting
ENV	3	15	Item 6 protect the Borough’s soil resources by encouraging appropriate management of soil by encouraging biodiverse landscapes in new development and management of land such as open spaces.
ENV	3	15	Economy: Helping build a strong responsive and competitive economy. Item 3 ‘green’
ENV	3	16	Economy: helping build a strong responsive and competitive economy. Items 7 add in the words Biodiverse farming that achieves net zero in carbon emissions.
ENV	4	17	Paragraph 3 mentions protecting our most environmentally sensitive locations but perhaps should include the word ‘enhance’-this reflects the ambition outlined in the Environment Bill.

**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

ENV	4	17	Last Sentence penultimate paragraph should read ‘good natural environment’
Transport Strategy	3 (Vision and Objectives)	18	<p><b>Q: Do you have any comments on the vision and objectives or think we have missed something?</b></p> <p>The scattered and relatively small-scale nature of the development locations around the borough means that it will be especially important for the local plan to have strong policies around the identification of cumulative impacts and the securing of mitigation to offset those impacts to achieve the stated vision and objectives.</p> <p>The Vision refers to “...excellent connections by <u>bus</u>...”. This, along with any other references to bus services (or similar) throughout the document (e.g. within draft policy LP33), should be widened out to refer more generally to “passenger transport” to reflect the County Council’s Passenger Transport Policy and Strategy (PTPS). The distinction is important given that the PTPS recognises the increasing financial challenges of supporting non-commercial, traditional bus services and the need for alternative solutions such as demand responsive transport or community initiatives.</p>
TSAP	4 (Development Strategy)	22	<p><b>Q: Do you agree that we should pursue a low growth rather than a high growth scenario?</b></p> <p>The initial transport evidence undertaken by Charnwood Borough Council helpfully highlighted the magnitude of transport impacts of differing growth options, both in terms of quantum and spatial focus. The evidence suggests that, in overall terms, the levels of housing growth proposed in the draft local plan should be capable of being accommodated on the transport system over the plan period, subject to appropriate mitigation.</p> <p>However, with regards to the pattern and scale of development proposed, it will be important for the local plan to have strong policies around the identification of cumulative impacts and the securing of mitigation to offset those impacts to achieve the stated vision and objectives.</p>
ENV	4	24	Should Public Health not also be a consideration for the Development Strategy

**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

ENV	4	27	Paragraph 1 the regeneration corridor should also support maximising the potential of other open space assets such as the Grand Union Canal and River Soar.
ENV	4	27	Should there not also be reference to Public Health in considering what types of development proposals will be supported.  Could it not also refer to encouraging Low / Ultra low forms of vehicles eg EV’s, LEV’s
ENV	4	28	protect and enhance most environmentally sensitive areas.
ENV	4	28	contribute to mitigating, <i>resilient</i> and adapting to climate change Under protect and enhance the intrinsic character of the countryside.
TSAP	4 (Development Strategy)	29	<p><b>Q: Do you agree with our preferred development strategy and the way it allocates development to different parts of the Borough?</b></p> <p>In comparison to the existing core strategy, the proposed distribution of new homes in the draft local plan contains a greater number of relatively smaller sites, more widely spatially distributed. This being the case, it will be important for the local plan to have strong policies around the identification of cumulative impacts and the securing of mitigation to offset those impacts to achieve the stated vision and objectives.</p> <p>With regard to specific locations, the identification of Shepshed as forming part of the Strategic Growth Plan’s “Leicestershire International Gateway” suggests that it will be necessary to revisit transport connectivity assumptions for this area, for example in respect of where people may choose to work in future. It may be necessary to consider joint work with North West Leicestershire District Council to develop supporting transport evidence in relation to this.</p> <p>Notwithstanding growth being relatively more scattered than the existing core strategy, Charnwood Borough Council’s transport evidence suggests that the draft Local Plan proposals are nonetheless likely to place considerable additional pressure on Loughborough’s transport system, which will require a coordinated strategy for mitigation.</p> <p>Equally, the proposed concentration of further growth around the north and west edges of</p>

**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

			<p>the Leicester Urban Area, when combined with growth within the City and Blaby District, means that a coordinated strategy will similarly be needed to develop and underpin delivery of transport mitigation measures in this area.</p> <p>Additionally, the proposed further growth in settlements in and around the Soar Valley is likely to put pressure on a highway network which is subject to significant resilience issues (i.e. regular flooding, limited cross-river connectivity). As above, this will need to be considered as part of strategies for mitigation in this area.</p>
ENV	4	30	<p>ADD</p> <ul style="list-style-type: none"> <li>• Create places that work for both people and wildlife</li> </ul>
ENV	4	30	<p>Note: high quality design and materials is to be commended but it is also important to consider ongoing / long-term maintenance. As non-standard materials can be costlier to maintain, suitable resource should be secured to fund ongoing long-term maintenance</p>
ENV	4	32	<p>ADD</p> <p>We will require new developments to make a positive contribution to Charnwood, by.....and provide attractive and functional places <u>that meet the current and future needs of the stakeholders</u>, where people will want to live.</p>
ENV	4	33	<p>LP2 the word biodiversity should be added into the sentence on respect and enhance the character of the area, having due regard to ‘biodiversity’</p>
TSAP	4 (Development Strategy)	35	<p><b>Q: Do you have any comments on draft policy LP2 (High quality design)?</b></p> <p>The County Highway Authority (CHA) supports the principle that developments should contribute towards the quality of the area and for that to be over the lifetime of the development. Either through additions or amendments to the draft policy, or through supporting text, the CHA would expect the Local Plan to set out how this is expected to be achieved in practice, in terms of the use of any non-standard materials or items proposed to be used within the public highway (e.g. through the use of commuted sums).</p>
Highway Development		39	<p>Birstall, Glenfield, Syston and Thurmaston are, in principle, potentially appropriate locations for growth in the district, given the range of facilities these locations provide; proximity to</p>

**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

Management			<p>Leicester; and public transport provision.</p> <p>Specific proposals in these areas should be taken forward in a comprehensively master planned approach, one that reflects any existing development proposals (including as relevant in neighbouring authorities) and other growth options with which this might interact, and that establishes the overall package of infrastructure measures (highways, transportation and otherwise) required to enable the growth and the approach to delivery / funding.</p>
HDM		39	<p><b>Land off Birstall Meadow Road/ Long Meadow Way, Birstall (10 dwellings):</b> Birstall Meadow Road/ Long Meadow Way are subject to Section 38 agreements / part publicly maintained. S38 (unadopted) fronting the proposed site and access works required to be approved by LHA plus developer/s who maintain the road.</p>
HDM		39	<p><b>Land at Gynsill Lane and Anstey Lane, Glenfield - Two parcels (120 dwellings):</b> Eastern parcel abuts Leicester City boundary and is located on A5630 Leicester Road (50mph section) – the Anstey Lane corridor is a key route into/ out of Leicester and connects to the Strategic Road Network (A46 to M1 to M69). Western parcel to the south of C3201 Gynsill Lane (60mph section). Has limited or no shared boundary with the public highway. There are very likely to be cross-boundary implications that would need to be considered, for example impacts on roads for which Leicester City Council and/or Highways England is the highway authority. The A46 around the west and north of Leicester and the M1 between Junction 21a and Junction 21 experience significant congestion, accident and journey time unreliability problems, and this would need to be reflected / considered in any transport assessment work. Whilst it is within the boundaries of Leicester City, the delays and congestion on A563 outer distributor road can have knock on affects for roads within the County (e.g. through Anstey) as drivers divert to less congested (and less appropriate) routes. This too will need to be reflected / considered in any transport assessment work. A5630 is an A-class road with a speed limit over 40mph thus may be restricted by policy IN5 of the LHDG.</p>
HDM		39	<p><b>Land south east of Syston - Two parcels (747 dwellings):</b></p>

**Leicestershire County Council Response to Charnwood Borough Council's Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

			<p>Eastern parcel: Does not abut public highway although wider strategic landscaping/ open space within proposed allocations seems to abut C4301 Barkby Road.</p> <p>Western larger parcel: Abuts residential cul-de-sacs only - St Pauls Drive, Pine Drive and Cedar Drive. Potential question of suitability of existing roads to carry the additional traffic from a development of 500+ dwellings (Policy IN5). This will need to be reflected / considered in any transport assessment work.</p>
HDM		39	<p><b>Land north of Barkby Road, Syston (157 dwellings)</b>  <b>Barkby Road, Syston (208 dwellings):</b></p>
HDM		39	<p><b>Rear of 36-46 Colby Road, Thurmaston (12 dwellings):</b>          Has no shared boundary with the public highway – land to rear of existing properties.</p>
HDM		39	<p><b>Rear of Manor Medical Centre, Melton Road, Thurmaston (20 dwellings):</b>          Does not abut the public highway. Located off A607 Melton Road on the Melton Road Service Road, less than 150m to Leicester City boundary. A607 is a key route into/ out of Leicester and connects to the Strategic Road Network (A46 to M1 and Newark).</p>
HDM		39-40	<p>Loughborough is, in principle, a potentially suitable location for growth in the district, given the range of facilities it provides; connections to Leicester and the M1; and public transport provision.</p> <p>Specific proposals within Loughborough should be taken forward in a comprehensively master planned approach, one that reflects any existing development proposals (including as relevant in neighbouring authorities) and other growth options with which this might interact, and that establishes the overall package of infrastructure measures (highways, transportation and otherwise) required to enable the growth and the approach to delivery / funding.</p>
HDM		39	<p><b>Land off Beacon Road, Loughborough (54 dwellings):</b>          Does not abut the public highway – only BOTAT K56 (known as Cross Hill Lane)</p>
HDM		39	<p><b>Sital House, 3-6 Cattlemarket, Loughborough (15 dwellings):</b>          Whilst adopted highway, Cattlemarket is pedestrianised.</p>
HDM		39	<p><b>Devonshire Square Opportunity Site, Loughborough (252 dwellings):</b>          Devonshire Square through to Granby Street, and Forest Road to Browns Lane are both one of a number of key routes that provides orbital traffic movements around Loughborough</p>

**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

			urban centre. This will need to be reflected / considered in any transport assessment work.
HDM		39	<b>Former Petrol Station, Pinfold Gate, Loughborough (25 dwellings):</b> Pinfold Gate is intersected by A6 Jubilee Way (Loughborough Inner Relief Road). Section of Pinfold Gate on which the site is located can only be accessed via Sparrow Hill (to the north) and not off A6. Exit from Pinfold Gate via Sparrow Hill or right turn only onto A6. A6 forms part of the County’s proposed Major Road Network and is a key orbital route that provides traffic movements around Loughborough urban centre. It experiences congestion and delays in peak periods.
HDM		39	<b>Part of Baxter Gate Opportunity Site, Loughborough (210 dwellings):</b> Site located on High Street and Pinfold Gate. There is pedestrian only access from Pinfold Gate onto A6 Jubilee Way (A6 vehicular access via B5350 Leicester Road and Baxter Gate). The A6 forms part of the County’s proposed Major Road Network and is a key route that provides orbital traffic movements around Loughborough urban centre. It experiences congestion and delays in peak periods; this will need to be reflected / considered in any transport assessment work. Site within 100m of pedestrianised Market Place (former A6).
HDM		40	<b>Retail Warehouse Car Park, Regent Place, Loughborough (37 dwellings):</b> Site abuts A6 Derby Road. A6 forms part of the County’s proposed Major Road Network and is a key route that provides traffic movements around Loughborough urban centre. It experiences congestion and delays in peak periods.
HDM		40	<b>Beacon House, Forest Road, Loughborough (9 dwellings):</b> B5360 Forest Road fronting Beacon House is a one-way street in the direction of Loughborough urban centre. It forms a key route that provides orbital traffic movements into and around Loughborough urban centre.
HDM		40	<b>31-32, Market Place, Loughborough (5 dwellings):</b> Whilst adopted highway, Market Place is pedestrianised.
HDM		40	<b>Former Main Post Office, Sparrow Hill, Loughborough (16 dwellings):</b> Site bordered by B589 The Coneries, Sparrow Hill and Cradock Street; and within 120m of A6 Jubilee Way. A6 forms part of the County’s proposed Major Road Network and is a key route that provides orbital traffic movements around Loughborough urban centre. It experiences congestion and delays in peak periods. B589 is a key route between the A6 / Loughborough urban centre and Loughborough train station/ A60 (wider Charnwood)/ A6004 (part of the County’s proposed Major Road Network



**Leicestershire County Council Response to Charnwood Borough Council's Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

			around Loughborough).
HDM		40	<b>Carillon Court Shopping Centre, Derby Square, Loughborough (43 dwellings):</b> A512 Derby Square fronting the site is a one-way street in a westerly direction (towards the A512 Ashby Road and subsequently the A6004 Epinal Way (part of the County's proposed Major Road Network around Loughborough)). Vehicular access to Derby Square via the northern section of C6006 Swan Street (southern section forms part of Loughborough urban centre pedestrianised zone).
HDM		40	<b>Land off Highland Drive and Knox Road, Loughborough (24 dwellings):</b> Highland Drive/ Knox Road are subject to Section 38 agreements. Access works required to be approved by LHA plus developer/s who maintain the road.
HDM		40	<b>30 Meadow Lane, Loughborough (52 dwellings):</b> The site is located on C6205 Meadow Lane and is within 300m of the A6 and 450m of the A6004. The C6205 is a key route between the A6 / Loughborough urban centre and Loughborough train station/ A6204 (wider Charnwood)/ A6004 (part of the County's proposed Major Road Network around Loughborough); this will need to be reflected / considered in any transport assessment work.
HDM		40	<b>Land Rear of Snell's Nook Lane, Loughborough (Nanpantan) (120 Dwellings):</b> C7205 Snell's Nook Lane forms part of a key route from Nanpantan, south Loughborough and Woodhouse to the A512 and M1. The A512 between Loughborough urban centre and the M1 Junction 23 can experience congestion and delays especially during peak hours (major works/S278 has commenced); this will need to be reflected / considered in any transport assessment work.
HDM		40	<b>Land at Woodthorpe, east and west of A6004 Epinal Way, Loughborough – two parcels (334 dwellings):</b> Eastern parcel abuts A6004 Terry Yardley Way (50mph) and Main Street, Woodthorpe. A6004 is part of the County's proposed Major Road Network around Loughborough and leads to the A6 towards Leicester; this will need to be reflected / considered in any transport assessment work. A6004 is an A-class road with a speed limit over 40mph thus any proposed new access on the A6004 may be restricted by policy IN5 of the LHDG. Western parcel does not abut public highway and is segregated from the nearest adopted highway by designated open space / outdoor sport pitches; this will need to be reflected / considered in any transport assessment work.

**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

HDM		40	<p><b>Nanpantan Grange, Land south west of Loughborough (544 dwellings):</b> Does not abut the public highway; the nearest adopted highway is a cul-de-sac which serves a hospice. Given the number of dwellings proposed consideration should be given to the suitability of the route to the site to carry the additional traffic; this will need to be reflected / considered in any transport assessment work.</p>
HDM		40	<p>Shepshed is, in principle, a potentially suitable location for growth in the district, given the range of facilities it provides; proximity to Loughborough and the M1; and public transport provision. Those parts of the settlement to the north of the A512 benefit most greatly from sustainable access to Shepshed District Centre.</p>
HDM		40	<p><b>Land off Fairway Road, Shepshed (378 dwellings):</b> The site is bordered by Fairway Road and the M1. Fairway Road leads to the A512 Ashby Road East part of the County’s proposed Major Road Network and then leads to the wider Strategic Road Network (M1 junction 23). The A512 between Shepshed and the M1 Junction 23 can experience congestion and delays especially during peak hours (major works/S278 has commenced in the area). The C3211 Leicester Road (off Fairway Road) leads into Shepshed District Centre. This will need to be reflected / considered in any transport assessment work.</p>
HDM		40	<p><b>32 Charnwood Road, Shepshed (15 dwellings):</b> C3212 Charnwood Road is a key route into Shepshed District Centre and the site abuts the designated District Centre boundary.</p>
HDM		40	<p><b>Land west of the B591/Ingleberry Road and north of Iveshead Road, Shepshed (174 dwellings):</b> B591 Ingleberry Road (60mph) leads to the A512 Ashby Road East part of the County’s proposed Major Road Network and then leads to the wider Strategic Road Network (M1 junction 23). The A512 between Shepshed and the M1 Junction 23 can experience congestion and delays especially during peak hours (major works/S278 has commenced in the area). Access to a range of facilities, including schools, public transport and Shepshed District Centre are on the opposite site (to the north) of the A512. As it is more remote from Shepshed than other locations, it is likely to be a challenge in terms of walking, cycling and public transport connectivity. This will need to be reflected / considered in any transport</p>

**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

			assessment work. The B591 is a B-class road with a speed limit over 40mph, thus any proposed new access on the B591 may be restricted by policy IN5 of the LHDG.
HDM		40	<b>Land North of Hallamford Road and west of Shepshed, Shepshed (250 dwellings):</b> Outside of ‘Limit to Development including Commitments’ and separated from developed Shepshed. Any proposal for a possible local plan strategy that envisages distributing significant levels of growth to more rural areas should be informed by a cumulative impact assessment and by consideration of the approach to securing mitigation for such impacts. This location is relatively more remote from Shepshed than other locations, which is likely to be a challenge in terms of walking, cycling and public transport connectivity.
HDM		40	<b>20 Moscow Lane, Shepshed (49 dwellings):</b> Moscow Lane is located off the A512 Ashby Road West (part of the County’s proposed Major Road Network) and then leads to the wider Strategic Road Network (M1 junction 23). Moscow Lane appears rural in nature (no footways/kerbing). Consideration should be given to the suitability of the route to the site to carry the additional traffic or mitigation measures. Access to a range of facilities, including schools, public transport and Shepshed District Centre are on the opposite site (to the north) of the A512. Consideration needs to be given to walking, cycling and public transport connectivity.
HDM		40	<b>Land rear of 62 Iveshead Road, Shepshed (76 dwellings):</b> C7207 Iveshead Road leads to the A512 Ashby Road Central part of the County’s proposed Major Road Network and then leads to the wider Strategic Road Network (M1 junction 23). The A512 between Shepshed and the M1 Junction 23 can experience congestion and delays especially during peak hours. This will need to be reflected / considered in any transport assessment work. Access to a range of facilities, including schools, public transport and Shepshed District Centre are on the opposite site (to the north) of the A512. Consideration needs to be given to walking, cycling and public transport connectivity.
HDM		40	<b>Land at Tickow Lane, Shepshed (243 dwellings):</b> The site is bordered by Tickow Lane and A512 Ashby Road West (60mph). The A512 Ashby Road West forms part of the County’s proposed Major Road Network and then leads to the wider Strategic Road Network (M1 junction 23). The A512 between Shepshed and the M1 Junction 23 can experience congestion and delays especially during peak hours. This will

**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

			need to be reflected / considered in any transport assessment work. The A512 is an A-class road with a speed limit over 40mph thus any proposed new access on the A512 may be restricted by policy IN5 of the LHDG.
HDM		40	<b>Land at Ashby Road West, Shepshed (27 dwellings):</b> The A512 Ashby Road West (60mph) leads to the wider Strategic Road Network (M1 junction 23). The A512 between Shepshed and the M1 Junction 23 can experience congestion and delays especially during peak hours. A512 is an A-class road with a speed limit over 40mph thus any proposed new access on the A512 may be restricted by policy IN5 of the LHDG.
HDM		41	Of the relatively less urban/ more rural settlements in the district, Anstey, Barrow upon Soar, Mountsorrel, Quorn, Rothley and Sileby are, in principle, potentially suitable locations for providing for some growth, given their range of facilities, that they are served by public transport and have good accessibility to services not available within the settlement. Piecemeal additions to relatively more rural settlements can provide challenges insofar as they can result in widespread cumulative impacts on infrastructure (highways, transportation or otherwise), but it is not possible for a particular site alone to mitigate those impacts. Thus, should the proposed draft local plan strategy be taken forward as envisaged; distributing significant levels of growth to these areas; any specific development proposals should be informed by a cumulative impact assessment for each settlement and by consideration of the approach to securing mitigation for such impacts.
HDM		41	<b>High Leys Farm/ Manor Farm, Anstey (110 dwellings):</b> The site is located on Bradgate Road (Service Road). This leads on to the C3206 Bradgate Road and The Nook, and subsequently connects to the wider Strategic Road Network (A46, to M1 to M69). C3206 provides orbital traffic movements around Anstey. This will need to be reflected / considered in any transport assessment work.
HDM		41	<b>Leicester Road, Mountsorrel (10 dwellings):</b> Has no shared boundary with the public highway – land to rear of existing properties.
HDM		41	<b>Loughborough Road, Quorn (75 dwellings):</b> The site is bordered by the C5214 Loughborough Road (50mph) and the A6 (70mph). The A6 is part of the County’s proposed Major Road Network around Loughborough and connects through to Leicester; this will need to be reflected / considered in any transport assessment work. The A6 is an A-class road with a speed limit over 40mph thus any

**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

			<p>proposed new access on the A6 may be restricted by policy IN5 of the LHDG. The site also abuts a 4-arm roundabout serving the two roads detailed above, plus the A6004 Terry Yardley Way (50mph) and the A6 Loughborough Road (50mph) which is a direct route into Loughborough urban centre. This area can experience congestion and delays in peak hours; this will need to be reflected / considered in any transport assessment work. The A6/ A6004 leads to the wider Strategic Road Network (A512 to M1 junction 23).</p>
HDM		41	<p><b>Land at Woodcock Farm, Rothley (107 dwellings):</b> Both sites are adjacent to the A6 which is part of the County’s proposed Major Road Network and connects Loughborough through to Leicester. It leads to the wider Strategic Road Network (A46 and M1); this will need to be reflected / considered in any transport assessment work.</p>
HDM		41	<p><b>Kendal Road, Sileby (32 dwellings)</b> <b>Land off Barnards Drive, Sileby (228 dwellings):</b> HS63 Kendal Road, Sileby and HS64 land off Barnards Drive, Sileby do not abut adopted highway.</p>
HDM		41	<p>Of the relatively more rural settlements in the district, Cossington, East Goscote, Hathern, Queniborough and Rearsby are, in principle, potentially suitable locations for providing for some small-scale growth, given they only have some (not all) local facilities and that they have lower service levels of public transport. Piecemeal additions to relatively more rural settlements can provide challenges insofar as they can result in widespread cumulative impacts on infrastructure (highways, transportation or otherwise), but it is not possible for a particular site alone to mitigate those impacts. Thus, should the proposed draft local plan strategy be taken forward as envisaged; distributing significant levels of growth to these areas; any specific development proposals should be informed by a cumulative impact assessment for each settlement and by consideration of the approach to securing mitigation for such impacts.</p>
HDM		41	<p><b>Land west of Main Street and north of Syston Road, Cossington (54 dwellings)</b> <b>Land rear of Derry’s Garden Centre, Cossington (70 dwellings):</b> The sites are likely to present challenges in terms of walking, cycling and public transport connectivity. This will need to be reflected / considered in any transport assessment work. The land to the rear of Derry’s Garden Centre does not abut adopted highway.</p>
HDM		41	<p><b>Land off Melton Road, East Goscote (223 dwellings):</b></p>

**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

			The site does not abut Melton Road nor any adopted highway. It is bordered to the east by the A607 Rearsby Bypass (60mph) which is a key route between Melton and Leicester; any proposed new access on the A607 may be restricted by policy IN5 of the LHDG. The A607 leads to the wider Strategic Road Network (A46 and M1); this will need to be reflected / considered in any transport assessment work.
HDM		41	<b>Land rear of 89 Loughborough Road, Hathern (35 dwellings):</b> The site connects to A6 Loughborough Road in two locations between existing dwellings. These routes into the site would appear to be sub-standard in terms of geometry and potential visibility thus this would need to be considered in any proposal.
HDM		41	<b>Land off Zouch Road, Hathern (50 dwellings):</b> The site is located on the A6006 Zouch Road (60mph); any proposed new access on the A6006 may be restricted by policy IN5 of the LHDG. The site is adjacent (within 150m) to the A6 part of the County’s proposed Major Road Network between Loughborough and Kegworth, and then subsequently to the Strategic Road Network (M1, A50 and A42); this will need to be reflected / considered in any transport assessment work.
HDM		41	<b>Land off Melton Road, Queniborough (55 dwellings)</b> <b>Land at Threeways Farm, Queniborough (100 dwellings):</b> The sites are located on the C3308 Melton Road. This leads directly into Syston District Centre or to the A607, which is a key route to Melton/Leicester. The A607 also connects to the wider Strategic Road Network (A46 and M1); this will need to be reflected / considered in any transport assessment work.
HDM		41	<b>Land off Gaddesby Lane, Rearsby (47 dwellings):</b> The site has no direct vehicular access onto the A607 Rearsby Bypass, and is only connected by Bridleway I116.
TSAP	5 (Housing)	42	<b>Q: Do you think the sites allocated for housing set out in draft policy LP3 are the right sites? If not, what changes or alternative sites would you propose?</b>  The scattered and relatively small-scale nature of the development locations around the borough means that it will be especially important for the local plan to have strong policies

**Leicestershire County Council Response to Charnwood Borough Council's Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

			<p>around the identification of cumulative impacts and the securing of mitigation to offset those impacts to achieve the stated vision and objectives.</p> <p>In locations where there are clusters of allocated sites in proximity (e.g. Syston, Shepshed), proposals should be taken forward in a comprehensively master planned approach, which reflects any existing development proposals (including as relevant in neighbouring authorities) and other growth options with which this might interact, and establishes the overall package of infrastructure measures (highways, transportation and otherwise) required to enable the growth and the approach to delivery/funding. There could be cross-boundary implications that would need to be considered, for example impacts on roads for which Leicester City Council is the highway authority.</p> <p>In the context of comprehensive masterplanning, the proposal for two separate, relatively small scale housing sites through allocation HS5 (Land at Gynsill Lane and Anstey Lane, Glenfield) is not especially helpful in transport terms, particularly in the context of potential adjoining growth opportunities in Leicester City and Blaby District. The CHA would prefer to see coordinated, joint working between the three authorities to deliver a single, comprehensively master planned development in this area.</p> <p>Whilst sites HS43 and HS44 are allocated as part of the growth proposed for Shepshed, they do not adjoin the wider urban area and are therefore likely to be relatively isolated from the town in transport terms, and more challenging to provide good quality sustainable travel connections to and from. The Local Plan will need to have strong policies in place to overcome this.</p> <p>Development within the “south east Charnwood” area (i.e. Syston, East Goscote etc.) should have due regard to the potential longer-term strategic growth and transport infrastructure requirements for this area as part of the Strategic Growth Plan’s “A46 Priority Growth Corridor”. Particular consideration may be required in relation to proposed allocation sites HS8, HS9, HS11 and HS67 within the draft Local Plan.</p>
TSAP	5	42	<b>Q: For some of the larger sites, we have shown on the Policies Map an indication of</b>

Leicestershire County Council Response to Charnwood Borough Council's Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation

	(Housing)		<p><b>the potential division of the site between the extent of the built form and the area for landscaping and green infrastructure. Do you think this potential division should be used to inform development at those locations?</b></p> <p>The delineation (and associated status) of potential landscaping and green infrastructure areas within allocated sites needs to be sufficiently flexible to ensure that this does not prevent the delivery of essential transport infrastructure required to facilitate these sites.</p>
TSAP	5 (Housing)	49	<p><b>Q: Do you have any comments on draft policy LP6 (Housing Mix)?</b></p> <p>With regards to new housing and specialist accommodation for older and disabled people across the Borough, it will be important to ensure that, as far as possible, these are situated in locations with satisfactory access to essential services and existing transport provision, to minimise potential additional transport requirements.</p>
HDM		61	<p><b>Employment land at Watermead Business Park, Syston (12.34 hectares):</b> The site is located on the Strategic Road Network, the A46 Leicester Western Bypass (70mph) and the A607 Syston Western Bypass (70mph). These are key routes into/ out of Leicester and connect to the wider Strategic Road Network (A46 Newark, to M1 to M69). There are to be cross-boundary implications that would need to be considered, for example impacts on roads for which Highways England is the highway authority. The site also borders and includes the C3306 Wanlip Road, which leads onto the A46 westbound. The A46 around the west and north of Leicester and the M1 between Junction 21a and Junction 21 experience significant congestion, accident and journey time unreliability problems, and this would need to be reflected / considered in any transport assessment work. The A607 and A46 are A-class roads with speed limits over 40mph thus may be restricted by policy IN5 of the LHDG.</p>
ENV	6	66	Assume any rural economic development would also need to meet requirements on not damaging the environment, meeting net biodiversity gain, mitigating and adapting to climate change etc?
ENV	6	71	Should it not also refer to providing infrastructure that encourages the use of electric vehicles



**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

			be that private vehicles, taxis, buses etc
ENV	7	75	We recognise the intrinsic value of the natural environment, its value as natural capital and the range of ecosystem services that it provides.  This is not so evident within the document. Still feels as if the environment is secondary to economic growth and housing development.
ENV	7	77	ADD <ul style="list-style-type: none"> <li>• Protecting landscape character and biodiversity</li> </ul>
ENV	7	77	Further to comment on the intrinsic value of the environment and natural capital LP19 does not include ref to this and instead pics out the intrinsic character and beauty of the countryside – which is not the same thing. This needs to be addressed
ENV	7	80	LP19 protect landscape character and biodiversity
TSAP	7 (Environment)	82	<b>Q: Do you have any comments on draft policy LP19 (Landscape, Countryside, Green Wedges and Areas of Local Separation)?</b>  It would be helpful if the final version of Policy LP19 made clear that it would be acceptable for essential infrastructure (including for transport) to be provided across green wedges and areas of separation where necessary to facilitate the development. An example where this might apply is the proposed allocation site HS5.
ENV	7	82	Tree and hedge planting
ENV	7	83	Not sure LP22 adequately recognises the intrinsic value of the natural environment, its value as natural capital and the range of ecosystem services that it provides and therefore is unlikely to protect it.
ENV	7	85	Note: Need to be mindful about the amount of tree planting in the highway and potential maintenance/safety implications. Significant underground services in the public highway will restrict where certain features including trees can be sited.

**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

ENV	7	85	L)22LCC would welcome involvement in the production the SPD on Biodiversity Net Gain recognising that habitat networks are cross district and therefore a strategic approach to the production of the SPD is essential.
ENV	7	87	LCC would be keen to ensure our Tree Implementation Plan is connected to Charnwood Tree Strategy
TSAP	7 (Environment)	90	<p><b>Q: How do you think we can best achieve our aspiration of significantly increasing the number of new trees that are planted in the Borough?</b></p> <p>The CHA acknowledges the role that trees can play in enhancing the quality of the area and helping to tackle climate change, including those planted as part of new developments. However, for these benefits to be realised in practice, it is vital that any newly planted trees that are likely to interact with the public highway are covered by effective management and funding arrangements for the lifetime of the development. Either through additions or amendments to the draft policy, or through supporting text, the CHA would expect the Local Plan to set out how this is expected to be achieved (e.g. through commuted sums and management companies/trusts).</p>
ENV	7	91	Feel policy does not sufficiently take into account the wider health issues. Open space in itself will not support people’s health and wellbeing. The quality of that open space and the available facilities is also an important factor as is the environment within which it is set especially in terms of air quality.
ENV	7	92	<ul style="list-style-type: none"> <li>● <del>Providing appropriate landscaping and a landscape scheme</del></li> </ul> <p>REPLACE WITH</p> <ul style="list-style-type: none"> <li>● Providing appropriate and practical landscape design solutions that reflect the identity and quality of place whilst meeting the current and future needs of the stakeholders in a sustainable and creative way.</li> </ul>
TSAP	7 (Environment)	93	<p><b>Q: Do you have any comments on draft policy LP24 (Heritage)?</b></p> <p>The CHA supports the principle that developments should contribute towards the quality of the area over the lifetime of the development. Either through additions or amendments to the draft policy, or through supporting text, the CHA would expect the Local Plan to set out how</p>

**Leicestershire County Council Response to Charnwood Borough Council's Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

			this is expected to be achieved in terms of the use of any non-standard materials or items proposed to be used within the public highway (e.g. through commuted sums).
ENV	7	104	Reduce impacts for areas of habitat that are vulnerable to climate change as per the Natural England Climate Change Vulnerability Mapping. Ensure that habitats vulnerable are in the best condition, to allow resilience to the negative impacts of climate change. Not referred to within the section.
ENV	7	104	LP33 requiring new developments to provide well-lit, safe and attractive walking and cycle routes that also offer connectivity for people and nature.
TSAP	7 (Environment)	108	<b>Q: Do you have any comments on draft policy LP30 (Sustainable Construction)?</b>  We would expect to see specific reference within Policy LP30 to incorporating electric vehicle charging infrastructure within the design of new homes/developments.
WASTE	8	109	Could LP 33 go further and seek to reduce dependency on the private motor vehicle. This will be critical to meeting climate change and air quality / health targets. Also relevant for LP 35
WASTE	3	14	In response to point 1 it is felt that there should be reference to the reduction of waste in addition to the minimisation and recycling of waste. In line with the revised waste hierarchy of 2008, prevention should be given the greatest priority.
ENV	8	102	Policy is good
HDM		115	The Sustainability policy LP33 quantifies 400m from a bus stop. This probably exceeds our PT policy.
HDM		115	"We will also work with infrastructure providers to trial new technologies such as street lamppost charging points and rapid charging hubs." Think Policy colleagues were waiting on government guidance on this. Lamppost / street charging, licensing and potential public liability isn't at all straightforward.
TSAP	7 (Environment)	116	<b>Q: Do you have any comments on draft policy LP33 (Sustainable Transport)?</b>  The CHA is proactive in supporting sustainable modes of travel. In October 2018, the County

**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

			<p>Council adopted its new Passenger Transport Policy and Strategy and is currently undertaking service reviews to consider affordable solutions to meet communities’ needs. In the context of the PTPS, it should be noted that the CHA is increasingly looking to put the onus on site promoters to come forward with passenger transport proposals appropriate to the scale and nature of their development as opposed to seeking financial payments through S106 agreements. It would be useful if the supporting text to the policy could reflect this.</p> <p>The commitment to pursuing walking and cycling initiatives in conjunction with the Local Plan is welcomed. With regards to the preparation of Local Cycling and Walking Infrastructure Plans, it is important that these are developed around appropriate geographical areas, in conjunction with relevant wider strategies in planning/development, and in partnership with the CHA and other bodies (e.g. Leicester City Council) where applicable. It is important that any LCWIPs produced across the housing market area follow a consistent, robust approach/methodology to ensure that these are best placed to secure funding for delivery of proposals identified. In practice this may require several geographically focussed LCWIPs rather than a single LCWIP for the district as a whole and it would be helpful if the wording within the policy/supporting text could be tweaked to provide flexibility in respect of this.</p>
TSAP	9 (Infrastructure and Delivery)	117-121	<p><b>General Comment:</b></p> <p>The lack of any reference to rail within this chapter is surprising given the importance of Loughborough Railway Station and the key supporting role to the quarrying industry within the borough.</p>
TSAP	9 (Infrastructure and Delivery)	118	<p><b>Q: Do you have any comments on draft policy LP34 (Local and Strategic Road Network)?</b></p> <p>Noting the potential interactions of growth proposed through the draft Local Plan with neighbouring Districts (including Leicester City, Blaby and North West Leicestershire) and the potential resulting cumulative impacts within and without the Borough, it would be helpful</p>

**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

			<p>if some supporting text could be added to policy LP34 to reflect this and provide a basis for cross-boundary contributions and mitigation (it may be considered more appropriate to embed this in the policy to ensure it has a sufficiently robust basis).</p> <p>The third bullet point of the proposed policy refers to “ensuring that any <u>road improvements</u> are supported by a robust transport assessment” – should the underlined portion actually be “development”?</p>
HDM		118	<p>“We will reduce congestion...” Not sure that wording is in line with the NPPF.</p>
HDM		119	<p>“Leicestershire County Council, as the local Highway Authority, has prepared a Leicestershire Highway Design Guide which provides advice on highway design, including parking standards. It makes recommendations on the levels of car, cycle, motorcycle, <i>electric car charging</i> and disabled parking that should be provided.”</p>
TSAP		121	<p><b>Q: What more should the Council and its partners do to ensure that there are robust plans in place for providing the infrastructure that is necessary to support new development in Charnwood?</b></p> <p>The Local Plan should provide a robust policy framework for ensuring that the cumulative impacts of growth (both within and without the borough) are properly understood, the approach to mitigation is clearly identified and the costs and approach to funding for supporting infrastructure and mitigation is also clear. This may include the need for comprehensive masterplanning across sites, the development of supporting strategies and the development of an agreed approach to the funding and cash-flowing of mitigation/supporting infrastructure.</p> <p>The Local Plan should also have due regard to the potential longer-term strategic growth and infrastructure requirements (including transport) within the “south east Charnwood” area (i.e. Syston, East Goscote etc.) as part of the Strategic Growth Plan’s “A46 Priority Growth Corridor”.</p>
TSAP		121	<p><b>Q: What steps could the Council and its partners take to ensure that a comprehensive</b></p>

**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

			<p><b>network of public transport services remains available?</b></p> <p>In October 2018, the County Council adopted its new Passenger Transport Policy and Strategy, and service reviews are currently taking place under this policy to consider affordable solutions to meet communities’ needs. In the context of the PTPS, it should be noted that the CHA is increasingly looking to put the onus on site promoters to come forward with passenger transport proposals appropriate to the scale and nature of their development as opposed to seeking financial payments through S106 agreements. This approach recognises the increasing financial challenges of supporting non-commercial, traditional bus services and potentially requires alternative solutions such as demand responsive transport or community initiatives to be explored. As such, the CHA would look to work with the Borough Council through the planning process to ensure that new development is appropriately supported by passenger transport services.</p>
HDM		138	<p><b>Burial Ground (yellow) – south west Loughborough</b> Does not abut the public highway – only BOTAT K59 (off Nanpantan Road – C3210) and PROW footpath K58 (off Cricket Lane).</p>
			<p>Not much mention of Park and Ride. Comes up in the Broadnook allocation but not in Sustainability or Parking.</p>
Strategic Planning			<p>Strongly welcome the emphasis on strategic sites in the ‘right’ locations; clearly expressed through saving the policies from the current Core Strategy regarding the North East of Leicester at Thurmaston SUE and west of Loughborough SUE, and the draft Local Plan which contains updated policies for the north of Birstall (confirming as a SUE allocation), and the Watermead Regeneration Corridor (confirming as an allocation as a regeneration corridor to support the regeneration of Thurmaston, help meet the needs for jobs and maximise the potential of the Country Park).</p> <p>Note Charnwood Borough Council’s preferred strategy, based on evidence (including the use of the new national standard methodology for calculating housing need) is to plan for a low growth scenario with a significant element of flexibility to take account of changing circumstances. This translates into Charnwood Borough needing to provide a further 5,930 homes to meet needs for the longer plan period once commitments are taken into</p>

**Leicestershire County Council Response to Charnwood Borough Council's Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

		<p>account, and a further 1,300 additional homes intended to provide sufficient flexibility to maintain a supply of housing land.</p> <p>The County Council supports an evidence-based approach to arriving at the preferred scale of housing provision, but expresses caution and concern this may be too low for the following three reasons:</p> <ul style="list-style-type: none"> <li>• Firstly, the Local Plan provision figure ideally needs to incorporate a buffer of 20% to enable sufficient flexibility, and to provide Charnwood Borough with the ability to maintain a five-year land supply of deliverable sites. It appears that this is not the case.</li> <li>• Secondly, partners are now in a position where the scale of unmet housing need for Leicester City is becoming clearer and although the redistribution of this unmet need is likely to be zero towards Charnwood Borough due to the strategy of the SGP, it is suggested that sufficient scope needs to be incorporated in emerging plan making to increase provision if informed through the Statement of Common Ground that this should be the case.</li> <li>• Thirdly, a low growth option does not appear to chime well with the Government's national ambition to achieve the delivery of 300,000 new homes each year, although it is noted that the low growth option would still require a step change in housing delivery in Charnwood Borough compared to its current Core Strategy requirement (820 homes a year).</li> </ul> <p>As such it is considered that the proposed further housing provision figure of 7,252 homes should be increased or regarded as a minimum and that further consideration is given to increasing the figure on the finalisation of the Statement of Common Ground.</p> <p>It would be helpful for the housing supply information to be set out more fully and with more clarity, so the 'step change' towards the SGP strategy can be seen more clearly.</p> <p>With regard to employment land the County Council strongly supports the development and further expansion of the Loughborough University Science and Enterprise Park, and notes</p>
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**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

		<p>the continued support for this in the draft Local Plan, recognising the scope to be one of the largest science parks in the UK with a diverse range of businesses within the knowledge-based and high technology manufacturing sectors.</p> <p>Reference is made to the wider needs for larger strategic distribution units in Leicestershire and the current study being undertaken at a Housing Market Area level to ensure a combined approach is taken to address the needs of this sector. The County Council supports this approach and understands the results will inform the Pre-Submission Draft Plan.</p> <p>Charnwood Borough Council has reviewed existing employment commitments and considers these continue to meet its needs and deliver its preferred strategy for economic growth. These commitments include employment provision as part of the SUEs at the North East of Leicester, West of Loughborough and North of Birstall as well as part of the Watermead Regeneration Corridor.</p> <p>It is considered that this approach, together with the continued focus of employment uses in Loughborough and Leicester, is appropriate; however, should further housing provision be made this should be balanced with the further identification of employment land to provide the opportunity for the co-location of jobs and homes.</p> <p>Welcome the opportunity to work with Charnwood Borough, North West Leicestershire District and the LLEP to further develop the vision and delivery of the Leicestershire International Gateway.</p> <p>Also wish to see commitment to comprehensive masterplanning within the draft Local Plan to aid the co-ordination and delivery of strategic sites and specific smaller sites; particularly where there is likely to be a cumulative impact from several related sites.</p>
<p>Economic Growth</p>		<p>Question 1 - Profile of Charnwood could be expanded to include town centre leakage figures and a list of key tourism assets</p> <p>Query the need for even the remaining non-food allocation given the move to on-line sales and the number of empty units – is there a way of encouraging use of existing empty units</p>



**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

		<p>before new ones are built?                  Question 7 – Draft Policy LP 2 omits any mention of new design to mitigate against climate change – ground source heat pumps, rainwater harvesting , green roofs wind turbines etc.                  Question 8 – good to see references in there around increasing biodiversity as this could be bottom of the pile in asks from any developer contributions.                  Question 10 - Support Draft Policy LP 5 as it backs up work of the Rural Housing Enabler through the Leicestershire Rural Partnership.                  Section 6.7 employment talks of the importance of the service sector but there is little on the University /college as an important employer in the area – are there any figures that could be included?                  Question 23 – how is the plan going to address issues around charity shops and betting shops?</p>
<p>Superfast Broadband</p>		<p>The support for the provision of superfast broadband networks for all homes and businesses is a welcome inclusion.                  As part of this support, it is advised that Charnwood Borough Council consider creating incentives for future investment in digital infrastructure within the Local Plan. This could include outlining how planning policies will facilitate the rollout of both fixed full fibre and mobile infrastructure.                  For example, Charnwood Borough Council may look to incorporate policies that enable the future of mobile connectivity and the rollout of small cells for 5G which will become increasingly important within urban areas. The Local Plan could also seek to ensure that all new developments have sufficient ducting space for full fibre connectivity. It could further support the effective use of rooftops and street furniture to accommodate mobile digital infrastructure including new 5G technologies.                  A ‘dig once’ approach could be prioritised and consideration given to mandating ‘open access’ full fibre provision to all new developments regardless of size.</p>
<p>Minerals and Waste Planning</p>		<p>Please be aware that on page 148 of the document, Draft Policy LP36 (North of Birstall Sustainable Urban Extension), the policy refers to the Leicestershire Minerals Development Framework but this has now been replaced by the Leicestershire Minerals and Waste Local Plan up to 2031 which was formally adopted on the 25<sup>th</sup> September 2019. Regard should be given to the Mineral and Waste Safeguarding Charnwood Borough Document S2/2015 which forms part of the plan and lists the areas of the borough which are safeguarded for</p>

**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

		<p>mineral purposes. Please be aware that several of the allocations in the Draft Charnwood Local Plan lie in sand and gravel safeguarding areas and this should be considered.</p> <p>With regards to the proposed site allocations, please be aware that site allocation HS 43 is adjacent to two approved waste management sites; Newhurst Quarry where a large-scale energy recovery facility is being developed, and the nearby former roof tiles factory where a waste transfer station currently operates from, Ingleberry Road. These are safeguarded in the Mineral and Waste Safeguarding Charnwood borough Document S2/2015 which forms part of the recently adopted Leicestershire Minerals and Waste Local Plan.</p>
<p>Adults and Communities</p>		<p>There are a number of good and diverse museums in Charnwood (including Charnwood Museum) and it seems a shame that they are not referenced. Similiarly there is no reference to Loughborough Library, the largest in the County. These cultural institutions play a significant role in supporting Draft Policy LP14 and the priorities around protecting and enhancing heritage assets and encouraging greater tourism at attractions such as the Great Central Railway; Carillion, Charnwood Museum and Stoneywell.</p>
<p>Strategic Property</p>		<p><b>The comments of the Strategic Property Services, Corporate Resources Department in relation to Leicestershire County Council’s role as a Landowner with property interests within Charnwood Borough follow below.</b></p> <p><i>Vision and Objectives</i> The vision and objectives are generally welcomed and show strong links with the Strategic Growth Plan and the County Council’s Strategic Plan 2018 – 22. However, the Development Strategy at Paragraph 1 could be expanded by the following addition, namely, “<i>to maintain the role of Service Centres as vibrant sustainable communities by the allocation of appropriate levels of new development</i>”.</p> <p><i>Development Strategy</i> The approach of using the standard methodology as a baseline assessment is seen as sound and complies with the requirements of the NPPF. However, it is recognised that there will be substantial unmet needs within Leicester City which will need to be accommodated within neighbouring authorities; the distribution of which will be set out in a Statement of Common Ground (SOCG) to be agreed by all authorities across the HMA. It is therefore</p>

**Leicestershire County Council Response to Charnwood Borough Council's Draft Charnwood Local Plan (2019-36)**  
**Preferred Option consultation**

		<p>essential that the plan is flexible enough to take account of the both the unmet needs of the City and potential economic growth. It is therefore considered that the proposed allocation of 7252 homes be regarded as a <b>minimum</b> and that further consideration be given to increasing this allocation on the finalisation of the MoU.</p> <p>In relation to employment needs the strategy needs to address any potential areas of market failure particularly in relation to providing the ability for fledgling business to be established and thrive providing a ladder for expansion and business development.</p> <p>The Settlement Hierarchy is seen as sound and the distribution of new homes across the hierarchy as logical as it concentrates on larger urban sites that have the ability to deliver the infrastructure required to support the new communities. In addition, the allocation of housing to Service Centres is seen as essential to maintaining the sustainability of these communities. However, the allocation of specific sites removes the flexibility essential to good plan making by reducing the ability to bring forward sites on an opportunity basis to meet any shortfalls in supply. Further, the reliance on small sites to deliver 10% of the allocation is questioned as is their ability to deliver the infrastructure required to mitigate their impact on local services.</p> <p>The aspiration that development is of good design meets that of the Strategic Plan and Strategic Growth Plan and is therefore welcomed.</p> <p><i>Housing</i></p> <p>To reiterate, with the exception of the three sustainable urban extensions (sites HS1 – HS3) the allocation of specific sites reduces the opportunity for other sites in sustainable locations to be brought forward to meet shortfalls in 5-year supply. In relation to its own land interests within Charnwood Borough the County Council would seek to promote the following housing site as a potential alternative to that proposed in Policy LP3:-</p> <ul style="list-style-type: none"> <li>• <u>Land at Farley Way, Quorn</u> – The Council owns 8 acres of land at Farley Way, Quorn situated to the west of the A6 By-pass adjoining existing development. Whilst, the land had previously been considered as being located within a flood risk area,</li> </ul>
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**Leicestershire County Council Response to Charnwood Borough Council's Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

		<p>exhaustive survey and technical appraisals have been undertaken in consultation with the Environment Agency which clearly demonstrate that the current flood map is flawed and that the development of the site is not constrained. It is therefore considered that the site is capable of contributing at least 48 new homes towards the housing needs of the village in a sustainable location close to all existing services and within what would be the logical limits of development. By comparison the site at Loughborough Road, Quorn is situated in a less sustainable location more remote from the village centre and extends into the area of separation between Quorn and Loughborough. Further, the land at Farley Way is both available, with a willing landowner, and deliverable. Additional information addressing the perceived flood zoning constraints has already been presented to the Local Planning Authority to provide confidence that the site provides a deliverable development option.</p> <p><i>Affordable Housing</i> The delivery of affordable housing accords with the Council's strategic objectives and is therefore supported. The level of affordable housing proposed at 30%, as a maximum, reflects the overall needs of the Borough, however, the proposal that small sites be exempt from contributing towards the achievement of the overall need may act to constrain the delivery of required numbers. Recognition that the proportion of affordable housing can be reduced in circumstances where it can be demonstrated that the viability of a site cannot support the full 30% of affordable housing is seen as sound.</p> <p>Policy LP5 is seen as maintaining the vitality of smaller settlements and therefore welcomed.</p> <p><i>Employment and Regeneration</i> The development and further expansion of the Loughborough University Science and Enterprise Park is strongly supported.</p> <p>In common with the allocation of housing sites the policy constrains the potential of bringing forward sites on an opportunity basis in locations which meets the criteria set out in the remainder of Policy LP12. For example, the County Council owns a 2.5 acre site at Barrow Road, Quorn with the ability to deliver circa 45,000 square feet of employment space within</p>
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**Leicestershire County Council Response to Charnwood Borough Council’s Draft Charnwood Local Plan (2019-36)  
Preferred Option consultation**

		<p>easy reach of the village in a location that provides excellent access to the major road network at a scale that would be attractive to SMEs and capable of meeting the needs of the growing community. Further, the land, which is within flood zone 1, is both available and deliverable.</p> <p>In addition, by taking a more flexible approach the opportunity exists to make up any shortfall in land supply caused by any existing employment sites being redeveloped for alternative uses.</p> <p>Policy PL16 is supported as it provides the opportunity to stimulate economic growth through the diversification of rural farming businesses and the economic use of underutilised assets.</p> <p><i>Environment</i> Policies LP19 – LP28 are seen as sound and meeting the requirements of the NPPF in relation to the range of issues covered and seeks to protect and enhance the important landscape, geological and other natural features of the Borough whilst promoting its leisure and economic potential.</p>
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