

APPENDIX 2

RSS Options Consultation Stakeholder Responses

Authority	HMA Option Preference	Key Comments
• Leicester Shire Local Authorities		
Blaby	Option 2 (although text appears to suggest more option 1)	<ul style="list-style-type: none"> • Current Regional plan targets are challenging, need evidence that any increase would not exceed environmental and infrastructure capacity of district. • Although Option 2 is chosen, the justification appears to suggest option 1. • Raised transport concerns: linking SUEs; deliverability of proposals; funding of mitigation measures.
Ch'nwood	None suitable	<ul style="list-style-type: none"> • Given that fundamental spatial strategy is not to be reviewed, options are fairly limited. • Supports urban concentration and regeneration as a principle but explains how difficult it will be to follow HMA option 1 due to environmental and infrastructure constraints; options 2 and 3 are increasingly difficult. • None of the HMA options is suitable and the Assembly should reconsider them taking account of the constraints in each district and the feasibility of them being overcome. • Propose an alternative HMA Option which promotes a tailored evidence-led approach focusing first on the PUA then SRCs and finally considering the potential of smaller towns on public transport nodes to become SRCs.
H'borough	Option 3	<ul style="list-style-type: none"> • Option 3 supported as this reassesses PUA and SRC capacities. • Option 1 is only rejected as it doesn't recognise the variable capacity of SRCs. • No LDF evidence to support option 4, also difficult to evaluate without scale. • No option to consider an additional SRC (Lutterworth). As not an option council took no view on this.
Hinckley and Bosworth	Option 1	<ul style="list-style-type: none"> • Option 1 consolidates existing proposals and assists in the longer term objectives of investments, regeneration and meeting local need. • Question how option 4 (new settlement) can be consistent with the overarching strategy of urban concentration and regeneration.
Leicester City	Option 1 in the medium term. Combination of Option 1 and 4 in the medium to long term	<ul style="list-style-type: none"> • Concern about increased commuting for options 2 and 3, particularly with Coalville as no rail link. • Support for option 4 and suggested location in or adjoining PUA. • Need to consider employment balance to avoid increased commuting and regeneration impact of options. • Difficult to assess fully without scale and distribution.
Melton	Option 1	<ul style="list-style-type: none"> • Option 2 and 4 rejected as shifts emphasis from Leicester. • Option 3 no particular objections, expects Coalville and Loughborough are towns for development.
NW Leics	Option 1	<ul style="list-style-type: none"> • Option 1 provides certainty for development, avoids changing tack. • Option 3 should clarify whether highlighting Coalville and Loughborough is illustrative or indicative of firm commitment to these settlements. • Ability to deliver option 4 is questioned, even by 2031. Consider looking into new settlement locations for post 2031, considering timescales required to plan and deliver.

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Oadby & Wigston	Option 3	<ul style="list-style-type: none"> • Option 2 and 4 rejected as not in conformity with overall strategy as shifts focus away from Leicester to SRCs or new settlement. • Option 1 is not opposed, but it is likely that some SRCs will have reached capacity for growth by 2026. • Option 3 supported as it focuses growth on Leicester and the SRCs that are most suitable to accommodate future growth.
• Government / Statutory Bodies		
The Gov't Office	N/A	<ul style="list-style-type: none"> • GOEM have not commented on the specific HMA spatial options as at this stage it is more appropriate to gather local views. • Stress that in identifying general areas for growth the most sustainable locations should be identified. This should include a preference for development within existing built up areas, particularly re-using previously developed sites, and sustainable urban extensions related to main urban areas where accessibility to services and facilities is good and sustainable patterns of transport can be achieved. • If a distribution of development is essentially different from that set out in Policy 3 in the current East Midlands Regional Plan this will have to be supported by very robust evidence, including a sustainability appraisal, that shows that such a pattern would meet the principles of sustainable development.
HCA (East Midlands)	N/A	<ul style="list-style-type: none"> • HCA does not wish to comment on specific options for HMA areas but has the following general comment on the options: HCA supports the Regional Plan strategy of 'urban concentration and regeneration' and notes the increase in housing provision required. • Whilst inevitably focussing on large scale and strategic housing provision, to meet targets, it seems that the contribution of Brownfield regeneration sites outside of PUAs and in smaller centres has been overlooked. Where these exist they are likely to contribute to sustaining smaller centres and the rural economy and in dealing with economic restructuring and decline.
English Heritage	None of the options are suitable	<ul style="list-style-type: none"> • All of the options involve some growth at all of the settlements currently identified to receive growth. • The existing strategy is already putting pressure on nationally and regionally important assets and further growth would exacerbate this situation, as pointed out in the Sustainability Appraisal (SA). • The expansion of Leicester is increasingly constrained by environmental constraints, including designated heritage assets, particularly to the north and east, so careful assessment of the potential for the area to accommodate further growth is required. • Existing concerns about the options for growth around Loughborough and within Charnwood itself and the existing strategy is likely to have adverse impacts on designated heritage assets. Loughborough is surrounded by many environmental constraints, including designated sites - historic and natural; the floodplain of the River Soar and Charnwood Forest. There is little potential for major urban extensions if these assets are not going to be further compromised. • Melton Mowbray and Market Harborough are both historic market towns with attractive town centres and there may be a capacity issue if their historic and strong local character is not going to be eroded. • Hinckley, the issue of coalescence with adjacent settlements, including Nuneaton might be an issue. • Coalville could probably accommodate further growth, but there is a strong

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		<p>local feeling about the loss of local identity of the settlements that about the town. However, it could help the regeneration of the area if sensitively carried out.</p> <ul style="list-style-type: none"> • Might be potential for a new settlement west of Leicester, but this would require further study; there are likely to be more disadvantages than advantages in such an option. • None of the options seem to work well for the historic environment.
Natural England	N/A	<ul style="list-style-type: none"> • Environmental limitations on growth in the River Mease SAC catchment. • Avoid increase housing delivery in or around Ashby-de-la-Zouch. • Water quality in the head waters of Charnwood is particularly good and this should not be compromised by development proposals. • Consideration of environmental capacity should be considered at the outset • SSSIs in the vicinity of Loughborough and Coalville • Advise that Loughborough's ability to take large amounts of growth is likely to be constrained by the river valley and that concentration of SSSIs within and around them. • Concentrations of development in and around Loughborough may exceed local environmental capacity to accommodate that growth and alternative approaches should be prioritised or clearer indications of quanta and distribution developed so that assessment of likely consequences can be made and mitigation or appropriate restrictions can be put in place. • Strategic growth to the eastern side of Melton Mowbray, which is a possible consequence of Options 1, 2 and 3 for the HMA could be likely to present significant problems in terms of water quality into the sensitive River Eye catchment. • Leicester is subject to a Flood Alleviation Scheme and future development should try not to further constrain the floodplain.
Env't Agency		<ul style="list-style-type: none"> • Not commented on a preferred option for growth in any HMA but would stress the importance of taking all the previous environmental issues into consideration as well as those specific to each HMA. • Leicester is at significant risk of flooding both from the River Soar and its tributaries, and from surface water • Large areas of Loughborough are at high risk of flooding from the River Soar on the edge of the town and from Wood Brook and Black Brook through the town centre. • The proposed growth should be a driver for change by seeking opportunities to move development away from floodplains and create green river corridors through parts of Leicester. • Melton Mowbray is protected from flooding from the River Wreake by an upstream flood storage area. • In more rural areas of Leicestershire runoff from farmland and arable farming practices is likely to lead to an increased risk of surface water flooding in future unless land use and farming practices change in order to reduce runoff rates and soil erosion. This could have an impact on Option 4 depending on the location. • Parts of Coalville are at significant risk of flooding from Grace Dieu Brook due to the under capacity of the channel, therefore surface water runoff will need to be investigate and appropriate attenuation measures implemented. • Hinckley is at a generally low fluvial flood risk.

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		<ul style="list-style-type: none"> The River Mease is a significant issue within NWLDC and presents a greater problem to development than that posed in South Derbyshire. Currently working with NWL to produce a water cycle study to ensure that this issue is suitably addressed as part of the LDF process. Suggest that the comments on the River Mease in the Partial Review Options paper are strengthened to reflect the current situation, referred to on page 29. The position described above can be supported through the Review of Consents report that has been produced as part of the Habitats Directive.
Highways Agency	Option 1, 2 or 3	<ul style="list-style-type: none"> Option 1 may help to minimise any increase in travel demand and continued focus of growth in these areas may support the provision of new locally accessible employment, retail and leisure uses further reducing need to travel. A risk that option 1 could produce adverse impacts, particularly on the M1 and at local pressure points on the network close to each of the sub-regional centres. Investigations are required to assess these risks. For option 2 Some SRCs may be better able to accommodate growth than others. Market Harborough and Melton Mowbray are felt to have limited capacity to grow. Whereas Loughborough has a wider range of employment, retail, other service opportunities, good public transport services and links. Likewise, Hinckley may also be a suitable location for additional growth. However, both areas experience significant local transport problems which could be compounded by additional growth. In particular, severe congestion on the A5 in the Hinckley area requires mitigating measures to be implemented prior to significant growth occurring in the area. With option 3, see comments for Option 2. More flexible than option 2 and could result in growth being directed to the most sustainable centres. For option 4 the impact is unclear without a location or size being identified. However in principle, it is unlikely to be the most appropriate approach to securing sustainable growth and reducing the need to travel. Problematic delivering employment, retail and recreational facilities on time and prohibitive costs of new infrastructure. Option 1, 2 or 3 all present potentially sustainable and deliverable ways forward for accommodating future growth within the HMA. SRCs could support sustainability in transport terms through access to employment, services and public transport, and through opportunities to fund the delivery of appropriate transport interventions in conjunction with development. Improved self containment of SRCs may help to reduce the overall need to travel especially by car, and disperse the impacts of growth on the strategic road network. The areas of greatest risk relate to impacts on the M1 and its junctions within the area. Principally to future development in the Blaby and wider Leicester area, Coalville and Loughborough. Growth related to East Midlands Airport may also present demands on the M1 and A453 to the north of the HMA. Junction specific issues also need to be considered and resolved on the A5 (Hinckley), the A42 (Ashby and Coalville) and on the A46 (Leicester).
West Midlands Regional Assembly		<ul style="list-style-type: none"> Growth in the Hinckley area will put additional pressure on the A5/A47 junction. The cumulative impacts of future housing and employment growth in the A5 corridor will necessitate the continued co-operation of regional bodies, the Highways Agency, Network Rail and local authorities

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		<p>to ensure the most effective transport interventions are identified.</p> <ul style="list-style-type: none"> In relation to the mitigation of transport impacts within the Leicester and Leicestershire HMA, EMRA is advised that the Government's response to the West Midlands Regional Funding Advice submission (February 2009) includes the A5/A444 Redgate junction improvement as major scheme proposal, with an anticipated start in spring 2012 and completion before 2014.
Advantage West Midlands	N/A	<ul style="list-style-type: none"> Nuneaton and Hinckley are proximate and share common infrastructure in terms of the A5. Any growth either side of the regional boundary should be accompanied by infrastructure investment.
<p>• Other Key Organisations</p>		
TCPA	Option 1	<ul style="list-style-type: none"> Option 1 appears sensible. Option 2 would probably direct too much growth to the four sub-centres, although an expansion of Market Harborough and Rugby (West Midlands) could help relieve growth pressures in West Northamptonshire especially if the Northampton to Market Harborough railway line was re-opened (which would then link Northampton with Leicester with onward travel possible to Derby and Nottingham). Option 4 might also be worthy of more detailed consideration. Recent research from the TCPA's East Midlands regional representative UCL indicates that it is more desirable to build a new town, such as Milton Keynes, rather than trying to expand an existing large town, such as Northampton from 120,000 to 250,000 people, although experience indicates that expanding a smaller town, such as Peterborough, from 75,000 to 150,000 can be reasonably successfully. A difficulty presented by another new town, of the size on MK, is its likely impact on Leicester and Northampton, the latter of which is already undermined by the success of MK.
National Trust	Option 3	<ul style="list-style-type: none"> An Option primarily based upon the PUA, with the majority of additional growth focussed in the main settlements remains the appropriate approach for this HMA. In terms of meeting likely housing needs Option 3 is the most suitable.
East Midlands Airport	Option 1	<ul style="list-style-type: none"> It would seem sensible to continue with the current strategy of focusing development in the Principal Urban Area of Leicester, and the Sub-Regional Centres of Coalville, Hinckley, Loughborough, Market Harborough, and Melton Mowbray (Option1) to avoid uncertainty in the housing market. Whilst not directly related to the question, the airport disagrees with the statement "Highway capacity constrains surface access to East Midlands Airport" in the summary of the area on page 29 of the document. This appears to be giving the airport undue prominence for the congestion on the M1 J23a to J24a and surrounds. Most of the congestion on the M1 J23a to J24a is largely due to matters outside the operation of the airport and will be as a result of increasing car ownership etc leading to more cars generally on the M1, A42, A50, A6 and A453.
Campaign to Protect Rural England (CPRE) East	Option 1	<ul style="list-style-type: none"> CPRE supports option 1 on condition that there is significant improvement to transport challenges, particularly traffic congestion, that exists in Leicester City and some SRCs. Any additional development to the north-west of the city should also be conditional on the opening of a passenger rail line from Leicester to Burton.

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Midlands		<ul style="list-style-type: none"> • Existing green wedges should also be protected to maintain the identity of neighbouring rural settlements and provide green lungs for the city. • Need study to consider the point at which high employment/self containment ratios in some of the market towns will be reduced which should limit further housing development in those areas.
East Midlands Transport Activists Roundtable	Option 1	<ul style="list-style-type: none"> • Representative at workshop does not support option 2 and 4 • Consider “cons” discussed under option 3 make it undeliverable in the medium term. • Problems with transport infrastructure in Loughborough are obvious to any visitor arriving by rail or road. • Significant development around Coalville would require a passenger rail service on the National Forest Line.
The Co-operative Group	Option 1	<ul style="list-style-type: none"> • Underpinning the above vision there is a need for decision making on spatial development options to be based on a thorough and fully transparent assessment process, to include comprehensive sustainability appraisal and viability assessments of the sort already carried out by The Co-operative Group in relation to their landholdings in Leicestershire. • Of the broad spatial development options set out in section 3 of the document, we consider the appropriate strategic approach for the RSS review is to continue to concentrate new development within and adjoining the region’s Five Principal Urban Areas (PUAs). This would maintain the broad thrust of policy 3 of the existing RSS and also, in the context of the Three Cities Sub-area, policy 12.
The Wildlife Trusts, East Midlands	Option 3 (avoid Loughborough & Coalville)	<ul style="list-style-type: none"> • Continuing with Option 1, resulting in development around Loughborough, could compromise a number of wildlife sites and also block potential wildlife corridors, such as the Soar valley. • Coalville also has some good wildlife habitat around it. • Leicestershire’s other market towns are not set in such a rich environment. • Option 3 would therefore appear to be a better one than Option 1, provided that development is not focused into Loughborough and Coalville.
East Midlands Env’t Link	Option 1	<ul style="list-style-type: none"> • Quote CPRE and EMTAR comments
HBF	Option 1 combined with a more dispersed pattern of development	<ul style="list-style-type: none"> • For each Housing Market Area (HMA) the HBF supports a hybrid option: one that continues with the current strategy of urban concentration and regeneration (option 1), combined with promoting a more dispersed development pattern across the towns and villages (not offered as an option for the L&L HMA).