

### CHARNWOOD CORE STRATEGY (FURTHER CONSULTATION)

#### LEICESTERSHIRE COUNTY COUNCIL RESPONSE

##### Questions

#### **4.1 Do you agree that Shepshed should be considered as part of the Loughborough Sub Regional Centre?**

Yes.

Because of the proximity of the two settlements, and the physical links between them, it is logical to consider them as part of one functional urban area. However, this should not detract from the separate identity and needs of Shepshed. The Leicestershire Sustainable Community Strategy recognises this and identifies the following priority outcome for Shepshed:

*“Shepshed Town Centre is improved with better range of shops, improved cleanliness and less antisocial behaviour in the evening”.*

If Shepshed is to remain part of the Sub-Regional Centre, it should not be excluded from any benefits that arise through the SUE and associated funding.

#### **4.2 Which settlement do you live in and what sort of place would you like it to be in twenty years time?**

The Leicestershire Sustainable Community Strategy sets out priority outcomes for places in Charnwood, and these outcomes are intended to inform delivery plans to show how they will be delivered at a “place” level.

#### **4.3 Any Other Comments?**

No

#### **4.4 Do you agree that housing development in Other Settlements should be restricted to affordable housing to meet an identified local need?**

Yes.

Whilst it is appropriate to restrict the amount of new housing development in small rural settlements, where additional housing in locations without services and facilities will lead to unsustainable travel patterns, this should not prevent small-scale housing to meet identified needs for affordable housing.

#### **4.5 Do you agree that the settlement limits should be removed from all Small Villages and Hamlets?**

Yes.

This is an appropriate policy approach to prevent inappropriate development in unsustainable locations.

#### **4.6 Do you think the settlement limits should be removed for the Other Settlements? (This would restrict future development to affordable housing only).**

No.

The settlements are of a size where it would be appropriate to allow small-scale development to meet the needs of the local community. This will help to make these communities more sustainable.

**4.7 Do you agree that further development in Service Centres could help to address local issues or improve service provision?**

Yes.

This may be a way of either ensuring local services are maintained or providing additional services where there is a deficiency. Significant new development that is not tied to maintaining or improving services should not be allowed.

The Leicestershire Rural Partnership and County Council's Better Places Team is conducting research to categorise settlements as Market Towns, Rural Centres or Village Centres, based on services available within settlements. Those services identified as essential for a Village Centre are primary school, post office, food shop, GP surgery, library, and pub.

The settlements identified by Charnwood as Service Centres align well with those identified those coming forward through research. The only anomaly is Rothley, where research has identified that there is not a GP surgery. Despite this it is accepted that Rothley performs the function of a Service Centre.

**4.8 Any Other Comments?**

No.

**4.9 Do you agree with identifying sustainable urban extensions rather than a large number of smaller extensions to urban areas?**

Yes.

This approach is consistent with the East Midlands Regional Plan (Proposed Changes) which sets out the Sub-Regional Strategic Context in para 3.1.5, and provision for new housing in Policy Three Cities SRS 3 and para 4.2.29. SUEs give the opportunity to create sustainable new communities, linked to existing urban areas by ensuring provision of a range of services and infrastructure.

**4.10 Do you agree that future growth of Loughborough and Shepshed should be focused west of Loughborough/north of Garendon Park?**

No.

There are two concerns about the Preferred Option:

Underpinning transport evidence

It is disappointing that the County Council as highway authority was excluded from the transport study underpinning the work to assess the transport element of the alternative options. It is also regrettable that the County Council's transport assessments which informed its advice to EMRA for the Regional Plan was not used as the basis for the further assessments.

The more simplistic approach adopted by the Charnwood study has produced results that underplay current traffic conditions and that bear little or no relation to the outcomes of other traffic modelling work for Loughborough; we question their soundness and robustness. Furthermore, whilst some mitigating measures are suggested, no regard is given to the actual practicalities of delivering improvements to public transport, walking and cycling facilities given prevailing traffic conditions and Loughborough's highly constrained road network. It is not safe to assume that the attractiveness of such modes can be improved significantly given current road network conditions and failure to achieve mode shift to date.

Based on the outcomes of its own extensive modelling of options for SUEs and mitigating measures, the County Council remains of the view that as part of an overall package of transport measures a Loughborough eastern distributor road offers the best prospect of delivering sustainable growth, reducing congestion and improving public transport in the town. To date, no evidence has been produced to change that. At its meeting on 1<sup>st</sup> October, the County Council's Cabinet agreed that:

*“taking account of the proposed overall increase in housing provision, the Cabinet regrets the decision of Charnwood Borough Council not to include in further consultation on its Local Development Framework Core Strategy preferred options for development to the east of Loughborough, since the inclusion of those options would give greater certainty to the development of a Loughborough Eastern Distributor Road as part of an overall package of transport measures required to deliver sustainable growth, reduce congestion and improve public transport in the town.”*

#### Future Flexibility

There is no easy option for growth at Loughborough. There are considerable environmental and other concerns associated with all the rejected alternative options, as listed in the Core Strategy. However, the County Council has highlighted considerable transport concerns about the preferred option location for the SUE west of Loughborough, which are underplayed by the Borough Council. In addition it is constrained by the M1 to the west, Hathern to the north and Garendon Park to the south so there is therefore little scope for further expansion at this location.

It is possible that there will be a significant increase in housing requirements in Leicestershire to 2031, arising from the Partial Review of the Regional Plan, which has already commenced.

The strategic choice facing the Borough Council is whether to proceed with a short term option at this stage, with the likelihood of having to go through a further selection process when an additional housing requirement is identified, or whether to proceed with a longer term option at this stage. There is no evidence that this longer term view has been considered.

The rejected option east of Loughborough (Option E) has the potential for further expansion, and also provides the best opportunity to tackle transport issues in Loughborough. The challenge with this location is to overcome the considerable constraints of transport linkages with Loughborough, impact on biodiversity and flood risk in the Soar Valley and loss of high quality agricultural land. These challenges, and potential mitigation measures, will need to be assessed through the LDF process.

**4.11 Do you agree that future growth of Leicester should be focused east of Thurmaston and north of Hamilton?**

Yes.

In general terms it is agreed that this is the most appropriate location, and it is consistent with the Regional Plan. It would have the least impact on nearby settlements and is of sufficient size to deliver the size of SUE required. However, para 4.24 should acknowledge that the development will also need to invest in a Green Infrastructure link to Watermead Country Park.

**4.12 Any Other Comments?**

No.

**4.13 Do you agree that there should be further employment land in the Borough and that it should be located at strategic urban extensions and at the science park?**

The proposal that new employment land is allocated to support the SUEs specifically for high value offices, industrial uses and small scale warehousing reflects advice in the Leicester and Leicestershire Housing Market Area Employment Land Study, recently completed by PASEC, and is supported.

New employment areas for the SUEs should not preclude the location of waste management sites within them. SUEs should contain provision for dealing with the waste arising within them (industrial/commercial and residential waste) and this is worth reflecting in the Core Strategy. This would accord with PPS10: Planning for Sustainable Waste Management which encourages communities to take more responsibility for their own waste and ensure that new development makes sufficient provision for waste management and promotes designs and layouts that secure the integration of waste management facilities without adverse impact on the street scene or the local landscape. The Regional Waste Strategy for the East Midlands states that consideration should be given to 'sustainable growth parks' which can lead to a coordinated approach to waste management preferably in conjunction with other forms of development.

**4.14 Do you agree that development at the Science Park should be restricted to research and development firms that complement the university's activities or other research and development firms in Loughborough?**

The Borough Council would need to be satisfied that this proposal is supported by the latest research including the PASEC study.

**4.15 Do you think the Council should consider alternative types of employment on the science park if a large single employer was interested in locating there?**

The Borough Council should take account of the PASEC study in this respect.

**4.16 Do you think we should seek to replace all the employment land lost since 2001 in addition to replacing the poor quality sites that are left in the Borough?**

Yes.

Retention of employment opportunities where people live is essential to delivery of a low carbon strategy and sustainable settlements.

**4.17 Any Other Comments?**

No.

**4.18 Do you agree with the approach to student housing in Loughborough?**

Yes.

**4.19 Any Other Comments?**

No.

**4.20 Do you agree with our approach to transport?**

Two studies were undertaken by the County Council and submitted in evidence to the Regional Spatial Strategy Examination in Public. The conclusions of this work broadly correlate with Charnwood's preferred option for an SUE at Thurmaston/Hamilton. But, in respect of Loughborough, the conclusion reached was that in order to deliver significant housing growth it will be necessary to remove a considerable amount of traffic from the town to be able to improve public transport walking and cycling to make the network function. It was further concluded that of all options tested, an eastern distributor road provided the best means to remove traffic.

In April 2008 the Congestion Management Study concluded that the Loughborough's network was one of the worst congested networks in Leicestershire, comparable with Leicester.

As part of the evidence base to underpin selection of the preferred option, Charnwood Borough Council commissioned a transport study, undertaken by consultants MVA. County officers have serious concerns about how the Charnwood transport study has been undertaken, its robustness and the soundness of the conclusions. These concerns are detailed in Appendix A. In summary:

- It is not based on use of either the Central Leicestershire or Loughborough traffic models.

- It very much underplays the extent of current traffic problems in Loughborough and contains no assessment of the impacts on Leicester.
- It assumes the development traffic can be catered for with the provision of walking, cycling and public transport, although makes no specific proposals as to how this can be delivered given the already congested and constrained road networks.
- No evidence has been provided to demonstrate the level of patronage/modal shift (to public transport, walking and cycling) that would be required to ensure sufficient mitigation of the traffic impacts.

County Council highway officers remain broadly supportive of an option for SUE at Thurmaston/Hamilton providing it is supported by transportation infrastructure. The Charnwood current preferred option for growth in Loughborough is in conflict with conclusions from previous studies undertaken by the County Council. While the primary concern is in respect to Loughborough, nevertheless the Charnwood transport evidence appears to lack robustness and it is questionable if any core strategy underpin by it would be considered sound.

#### **4.21 Any Other Comments?**

The Sustainability Appraisal appears to reject the idea of an eastern distributor relief road for Loughborough on the grounds of its impact on biodiversity, especially on the strategic river corridor. However, the section on transport (4.48 et seq) is rather vague, and is not explicit about road infrastructure. New roads often more disturbing to biodiversity than the development areas they serve, as they frequently sever biodiversity networks and bring about habitat fragmentation. It is important that the need for any major road infrastructure is identified at this stage.

#### **4.22 Have we identified the most important features of green infrastructure within the borough?**

Green infrastructure also includes the access network (rights of way, permissive paths, recreational routes, open access land, village greens etc.) and the National Forest (including access land).

The references to Charnwood Forest are supported, but there could be reference to the Climate Change risk to Charnwood Forest ecology.

#### **4.23 Do you agree that dealing with all the green infrastructure assets in a single approach is the most appropriate way of achieving a net improvement?**

There is concern about combining the different elements that make up Green Infrastructure assets into a single approach. There is a risk that biodiversity elements could be subsumed in this approach or forgotten about. It may also lead to compensating for the loss of a biodiversity asset by providing, for example, a recreational asset. It is important that to ensure that each element within the overall GI is given its appropriate status, whilst still acknowledging that there are advantages to a holistic approach.

#### **4.24 Any Other Comments?**

The Core Strategy contains a very sensitive and positive approach to biodiversity issues, and identifies the important elements within the overall biodiversity network. The use of some up-to-date Phase 1 habitat surveys as part of the evidence base to inform the options appraisal of the growth areas and roads is welcomed.

However, geological conservation is not mentioned at all, and there is only one reference to geology. Geology is an extremely important part of Charnwood's heritage, with several geological SSSIs and RIGS. In the past the British Geological Society has proposed Charnwood as a Geopark.

It is particularly welcome that the importance of strategic river corridors is acknowledged. The RSS Strategic River Corridors policy suggests that the important issue is to recognise the need for integrated management in the development of multifunctional benefits. In the River Soar and Wreake case, there should be references to the important role in natural floodplain management and the opportunity for biodiversity improvements through recognising the important wildlife corridor it represents. In the RSS the Strategic River Corridors are also recognised as Biodiversity Enhancement areas - there is a real opportunity to recognise the Soar Valley as a strategic biodiversity focus landscape scale improvement working on the foundations of what already exists and has been created at Watermead, Cossington, Barrow and Loughborough.

The significance of these corridors in the context of climate change could perhaps be stressed more. For example reference could be made to this in the sections on Green Infrastructure. In references to flooding along the Rivers Soar and Wreake, other climate change adaptation issues that should be addressed include drought (therefore measures to hold water back), sustainable urban drainage systems, wet woodlands etc, shade in urban areas, including design standards, species choices etc.

There should be reference to Green Wedge Strategies, Watermead Country Park Management Plan and Rothley Brook Management Plan.

#### **4.25 Do you agree with our approach to Regeneration?**

The regeneration strategy outlined should include more emphasis on proactive regeneration initiatives adopting a coordinated and prioritised approach. It should focus on the underlying economic challenges within the Priority Areas; reducing the relative deprivation as measured by the Indices of Multiple Deprivation and improving the quality of life within the Priority Neighbourhoods at a faster rate than other parts of Charnwood, in line with the County Council SCS.

The issues surrounding studentification of west Loughborough need to have a higher priority within the regeneration approach; although a strategic housing issue it has wider regeneration impact and is at the heart of place-shaping. It also can have a significant impact on social cohesion which is a priority In the Place Section of the County Councils Sustainable Community Strategy.

**4.26 Are there any other general regeneration priorities that we should be considering?**

The regeneration approach should recognise and acknowledge the benefits of focussing activity on town centre development within the main service centres.

It should also maximise the benefits in terms of improved learning opportunities and community cohesion afforded by initiatives to cluster service provision through links with a wide range of agencies including the voluntary/community sectors.

**4.27 Do you support the idea of Area Action Plans for Shepshed and Thurmaston?**

Whilst it is clear that the unique issues facing Shepshed and Thurmaston need an integrated and coordinated approach to engage landowners and developers to ensure long term improvements, more consultation is required with stakeholders to explore other options before committing to an Area Action Plan process as the best option for moving forward.

**4.28 Any Other Comments?**

No.

**4.29 Do you agree with our approach to Design?**

The section on design does not seem to make the link to tackling climate change which is a priority for the document as a whole. Good design needs to refer to how developments work as well as how they look. There should be a better integration with the section on renewables and low carbon energy generation. It would be helpful therefore to refer to government targets on zero carbon housing by 2016 and non residential by 2019 in this section as well.

**4.30 Any Other Comments?**

No.

**4.31 Do you agree that we should consider increasing the proportion of affordable homes we require on new housing sites from 30%?**

Any policy on the percentage requirement for affordable homes should take account of the information provided by the Strategic Housing Market Assessment.

**4.32 Do you agree that we should consider lowering the threshold for sites that qualify for providing affordable homes?**

Any policy on the percentage requirement for affordable homes should take account of the information provided by the Strategic Housing Market Assessment.

**4.33 Any Other Comments?**

No.

**4.34 Do you agree with our approach to meeting the needs of Gypsies, Travellers and Showpeople?**

Yes.

**4.35 Any Other Comments?**

No.

**4.36 Do you agree with our approach to large-scale renewable energy?**

Paragraph 4.118 states that there is an anaerobic digester at Wanlip with the 'potential to expand'. Further information is necessary to clarify the option to expand this facility. The potential to expand the site could be constrained by the floodplain and the existing site boundary. As part of any evidence base the County Council would expect the site operator to have put the site forward, or be aware of the proposal and the Highways Authority consulted to ascertain whether in highways terms expansion of the site would be acceptable. We cannot find any reference to this in the evidence base. Both would assist in demonstrating that the expansion of the site is deliverable. It is likely that the extension of the anaerobic digester plant at the site would be a waste development, hence determined by the County Council.

Any biomass plant or CHP plant envisaged in Charnwood's strategy which uses waste solely or predominantly as a fuel source would be classified as a waste recovery facility (and possibly a strategic waste site) and as such would have to accord with emerging policy provided in the Leicestershire and Leicester Waste Development Framework Core Strategy and Development Control Policies which aims to direct facilities of these types to specific areas (see Policy CS1 in particular).

**4.37 Do you agree that sustainable urban extensions should be zero-carbon in advance of the Building Regulations?**

There is an opportunity to add value to Policy 2 of the Regional Plan. Consideration should be given to all new housing and even if economies of scale are difficult for schemes below 10 dwellings, it should still be possible to achieve some embedded generation. Equally there should be a statement about levels of efficiency that will need to be achieved in all new buildings between now and 2016.

It is incorrect to suggest that New Growth Point funding will be sufficient on its own to ensure that the SUEs be exemplar zero carbon developments - this will also need developer funding, Section 106 / Community Infrastructure Levy and possibly some exchequer funding as well.

**4.38 Any Other Comments?**

The threshold of 10 for renewable energy requirements could mean that no sustainable standard homes would be developed in Other Settlements, Small Villages and Hamlets where only small scale development would be permitted.

**4.39 Do you agree with our overall approach to retail and town centres?**

Apart from Loughborough Town Centre there is only reference to retail development. Balanced communities and town centres are about other issues as well as retail. The Core Strategy needs to consider amongst other things the balance between pedestrians and cars, public realm/sense of place issues, the role of historic buildings, priorities for improvement and facilities for visitors.

**4.40 Do you agree with our approach of focussing new retail floor space towards Loughborough Town Centre?**

No comment.

**4.41 Any Other Comments?**

No.

**4.42 Do you agree with the list of things developers should contribute towards?**

Developer contributions are becoming increasingly important in securing the appropriate levels of required services, facilities and infrastructure, particularly for major new development. The emerging East Midlands Regional Plan Policy– Regional Priorities for Implementation, Monitoring and Review refers to local authorities needing to ‘...’*provide guidance on the appropriate levels of developer contributions, and the mechanisms for securing the delivery of such contributions...*”

The Core Strategy needs to ensure that appropriate levels of developer contributions are secured for local infrastructure, services and facilities for the delivery of sustainable development and communities.

An infrastructure Plan is currently being prepared by the County Council to ensure joined-up understanding of future infrastructure needs, facilitate co-ordinated delivery, making the most effective use of available funding and support the delivery of development sites.

Developer contributions input to the Infrastructure Plan is becoming increasingly significant in securing the appropriate levels of strategic services and facilities, particularly for major new development proposals for both the associated infrastructure, facilities and services to support substantial new growth such as the SUEs.

The policies relating to developer contributions in the Core Strategy and proposed SPD need to be strengthened, particularly in respect of major developer proposals such as the proposed SUEs. This can be achieved through various measures which should be highlighted within the Core Strategy including master-planning, frontloading, pre-applications enquiries and/or negotiations.

To meet the potential opportunities of delivering major sustainable development and communities within Charnwood, the developer contributions and infrastructure provision referred to within the Core Strategy need to be more robust in terms of the objectives, principles and the use of planning obligations to secure infrastructure and services and have detailed policies set out in the Core strategy and a Supplementary Planning Document.

In addition the Council should consider the following in preparing a developer contributions policy within the Core Strategy and SPD:

- ensure that all new developments in Charnwood are served by adequate physical and social infrastructure and that such new development is carried out in a manner that secures appropriate developer contributions towards the provision of infrastructure and the mitigation of its environmental impacts;
- fully engage the infrastructure/service providers including the county council in the consultation process during the further consultation on the Core Strategy preparation process and the developer contributions SPD. The policy to include an opportunity to address sustainability, feasibility and viability issues where they arise;
- provide in the Core Strategy clear guidance of the requirements for contributions to be placed on developers for new infrastructure, facilities and services to mitigate the impacts of new development and include reference to the pooling of contributions and phasing of infrastructure contributions where required;
- ensure that policies in the Core Strategy and proposed SPD develop a consistent and transparent approach to the negotiation, securing and implementation of developer contributions which accords with the RSS and the County wide developer contributions guidance (the Statement for Requirement for Developer Contributions in Leicestershire), through the preparation of supplementary planning documents on developer contributions, where appropriate;
- To work in partnership with the County Council in developing the Infrastructure Plan to ensure a consistent approach to the negotiating, securing and implementation of developer contributions through the Cores Strategy and proposed SPD on developer contributions, procedures and processes and protocol as well as through the determination of individual planning applications, where appropriate.

Paragraph 4.137 makes some reference to the proposed Community Infrastructure Levy (CIL). However the policy on developer contributions and infrastructure provision in the CS and the proposed SPD will benefit from detailed reference to the proposed CIL and should be adaptable and flexible to account for future proposals and changes to the developer contributions system. This is in order to ensure developer contributions are secured to assist in the delivery of infrastructure provision and service requirements, to support new growth particularly for major and strategic development within the Borough.

#### **4.43 Any Other Comments?**

No.

#### **5.1 Do you agree with the boundaries drawn for each sub areas?**

No comment.

**5.2 Which sub area do you live in and what do you think are the key issues and opportunities?**

No comment.

**5.3 Any Other Comments?**

No.

**5.4 Do you have any comments on the proposals for South Charnwood?**

Education Requirements

Primary Schools: the SUE is likely to generate a need for approximately 2 medium sized schools and 1 large school. The County Council would expect the developer to provide sites free of charge within the SUE and fund the new schools from Section 106 contributions.

Secondary schools: the SUE is likely to generate a need for approximately 830 secondary places (including Post 16 places). The County Council would expect Section 106 contributions from the developer to enable us to expand nearby schools to accommodate these children.

For Service Centres more detail of actual allocations would be required to assess any additional education infrastructure that may be required.

**5.5 Is there anything else that we should consider in planning for this sustainable urban extension?**

The Thurmaston / N Hamilton SUE could deliver biodiversity improvements - especially in habitat connectivity and creation of floodplain wetland along the regional corridor of the River Soar and the local corridor of the Melton Brook. This could contribute significantly to local and regional Biodiversity Action Plan targets. This is not specifically referred to in the Green Infrastructure section. Reference could also be made to improving access to natural greenspace.

**5.6 Any other comments?**

No.

**5.7 Do you have any comments on the proposals for North Charnwood?**

Education Requirements

Primary Schools: the SUE is likely to generate a need for approximately two medium sized primary schools. The County Council would expect the developer to provide sites free of charge within the SUE and fund the new schools from Section 106 contributions.

Secondary Schools: the SUE is likely to generate a need for approximately 600 secondary places (including Post 16 places). We would expect S106 contributions from the developer to enable us to expand nearby schools in Loughborough.

For Service Centres more detail of actual allocations would be required to assess any additional education infrastructure that may be required.

### **5.8 Is there anything else that we should consider in planning for this sustainable urban extension?**

Reference could be made to improvements to habitat connectivity and to accessible natural greenspace. There are improved opportunities here to create improved biodiversity links south to north.

### **5.9 Any other comments?**

The following amendments to the Spatial Objectives are suggested.

- SO3: add “Green Infrastructure network” after green spaces;
- SO6: amend to read: “through influencing the type of housing and employment land provision”;
- SO7: Should refer to national targets for carbon reduction and renewable energy generation;
- SO12: amend to read: “*protect* and enhance”
- SO13: amend to read: “and by encouraging improvements in existing properties to work towards zero carbon standards”;
- SO21: should also recognise a wider range of outward facing partnerships at Leicestershire level (e.g. Leicestershire Together, PEP etc); Sub - Regional level (e.g. National Forest); National and European level, as vital for the future of Charnwood and for the delivery of the LDF vision.

## **APPENDIX A**

### **Concerns about Charnwood Borough Council's Transport Assessment.**

1. MVA's report does not acknowledge that there is congestion in Loughborough. However, the 6 C's Congestion Management Study found that *"in Leicestershire the worst affected is Loughborough, where delays per mile are comparable with those in Leicester."*
2. They did not consult other relevant agencies on the assumption made, or their methodology in the assessment. We consider that these are not robust and would not stand up to scrutiny at the LDF Examination in Public.
3. They used a simplistic spreadsheet to assess the traffic impact. We have used a traffic model which more accurately reflects the changes in traffic behaviour, and impacts on individual junctions and road links.
4. They have criticised the County Council transport work without fully understanding the approach that we took to assess the implication of growth, or the proposed mitigation measures. For example they did not appreciate that we modelled both am and pm peaks.
5. They have over emphasised the roles that increased walking, cycling and public transport can take in reducing car trips in a market town such as Loughborough.
6. They have concluded that growth can be accommodated without major transport improvements. The modelling work we completed shows that congestion will be significantly increased without major improvement to the transport network.