

Appendix

Charnwood Borough Council Pre-Submission Charnwood Local Plan (2021-37) Consultation Leicestershire County Council Officer Comments

Section	Comments
Overall Document	<p>The County Highway Authority (CHA) has worked closely with Charnwood Borough Council (CBC) to support and enable the successful delivery of growth in the Borough, including to secure the successful adoption of the current Core Strategy and to secure the delivery of transport infrastructure to enable the growth proposals that it contains.</p> <p>Thus, the CHA recognises the importance of continuing to deliver growth in a ‘planned’ manner (as opposed to ‘unplanned’, ad-hoc and speculative), and therefore wishes to see the new Local Plan successfully adopted.</p> <p>Given significant existing pressures on the Borough’s transport system – including on the Strategic Road Network (SRN)– the evidence developed so far for the Local Plan has demonstrated the transport challenges in seeking to accommodate yet further growth in the Borough. Many of the transport issues arise from the cumulative impacts of growth across and without the Borough (especially around the western and northern areas of the City of Leicester and the adjoining areas in the County). To address these challenges will require a structured, coordinated and strategy led approach, one that will continue well beyond the Local Plan’s adoption. This applies not just to highway infrastructure improvements, but also to the coordinated provision of passenger transport service improvements and cycling and walking measures, the costs of which are likely to be significant (in capital and revenue terms) especially in the light of the Government’s ambitions for significantly improving provision for cyclists and pedestrians, and passenger transport, as set out in its ‘Gear Change’ Cycling and Walking Plan and National Bus Strategy (‘Bus Back Better’) respectively.</p> <p>Building on the evidence work to date, the CHA is continuing to engage with CBC about the details of a continuing work programme – extending beyond the Plan’s adoption – that seeks to develop the supporting strategies necessary to ensure that both authorities are in as strong a position as possible to secure investment in the package of highways and transport measures that will be required to enable the delivery of further growth in the Borough over the lifetime of the Plan.</p> <p>The CHA anticipates that the outcomes of any continuing work programme that should be available by the time of the Plan’s Examination in Public are likely to necessitate discussions with the Inspector about the need for possible changes to the draft Plan’s narrative text and policies. This is so as to reflect the evolved and evolving situation and to ensure that the Plan provides as</p>

	<p>strong a policy platform as possible for seeking to secure the required highways and transport investment. Some potential examples are flagged elsewhere in the CHA’s comments. Were there to be an absence of a sufficiently strong basis, the CHA has concerns that it would not be possible to secure appropriate national/public and developer contributions, leaving cumulative impacts unaddressed, which would in turn give rise to potential adverse economic and environmental impacts and could ultimately result in the CHA advising refusal of planning applications on the basis of severe residual impacts.</p> <p>The remainder of the CHA’s comments should be considered in the context of this overall comment. They are intended to be constructive in seeking to ensure that the Plan as adopted reflects the challenges faced in seeking to deliver further growth in the Borough whilst providing as strong as possible Plan policy basis on which to address those challenges. The CHA remains committed to working with CBC to achieve this.</p> <p>Various references are made throughout the Plan to growth in Shepshed “<i>supporting the Leicestershire International Gateway as set out in the SGP</i>”; initially within the Vision (page 14), then again within the Development Strategy supporting text (page 28), and finally within Policy SUA1(Shepshed Urban Area) and preceding supporting text (pages 115, 118 and 120).</p> <p>Whilst this intent to link the Local Plan Development Strategy to the SGP is welcomed, it is suggested that the Local Plan should provide at least a strong accompanying vision and objectives to demonstrate how Shepshed will be connected/integrated with the wider Gateway Area in practice (especially the wider employment opportunities likely to arise from this). This would provide a platform to substantiate a robust transport evidence base and strategy to support this ambition going forward under policy SUA1.</p>
Introduction	
Profile	<p>The projected increase of 78% between 2011 and 2036 in the number of people aged over 65 years old and the 157% increase in those aged over 85 is a particular point of interest when looking at the projected health needs of the population, as are the expected student numbers at Loughborough University. Needs around suitable housing, access to services, access to medical care and social connectivity are all key.</p> <p>Car/van ownership of 536 per 1000 residents/81.9% of households owning a car (based on 2011 Census data and perhaps increasing since) and the amount of travel to work by car highlights the need for considerations around air quality and carbon reduction, particularly based around those experiencing health inequality from air quality (young, older people, pregnant people, those with long term health conditions).</p> <p>The jobs and prosperity section could include NOMIS data around type of work – this would provide a clearer picture of the work demographics and can inform a much-improved health and economic wellbeing picture.</p>

	<p>It would be interesting to demonstrate whether or not Charnwood is an outlier in any type of deprivation - i.e. health/economic. There is no reference point of regional or national comparators to the 'active people' data, nor to the statement, <i>"In Charnwood, the life expectancy for males is 80.8 and for female its 83.8. (Public Health England, 2017-19)"</i>. GP Practice data is helpful, but PCN information would also be beneficial. A key indicator where planning can make a difference is in obesity, but this is omitted from the profile summary.</p> <p>P.9 - <i>"Charnwood's tourism sector grew by 38% between 2011-16 with opportunities including the expansive countryside, Charnwood Forest and enhancements to Loughborough town centre and heritage quarter (Charnwood Blueprint for Tourism)"</i> - This data has now been superseded by STEAM tourism economic impact reports for 2017 and 2018.</p> <p>There is no mention of the business tourism offer – the award-winning Imago venues, part of Loughborough University in Loughborough provides the largest business conference venue in Leicestershire. It is renowned for its sporting heritage and there is an Elite Athletes Hotel on site with unique altitude-controlled bedrooms, for elite athletes to train. There are 3 other conference venues on site including a purpose-built conference centre with capacities ranging up to 280 delegates in one room. Two of the venues also offer accommodation of 185 4-star standard bedrooms and 94 3 star standard bedrooms, whilst the Elite Athletes Hotel has 44 bedrooms. Other conference, meeting and wedding venues in Charnwood include Beaumanor Hall, Quorn Grange Hotel, Prestwold Hall hotel, Ramada and a range of budget hotels. The Great Central Railway promotes its unique offer to corporate delegates offering exclusive use for meetings and dinners. Charnwood Forest and Loughborough feature as one of seven key district visitor hubs in Leicestershire in the sub-regional Tourism Growth Plan 2020-2025.</p>
Vision	<p>Whilst referring to 'development' repeatedly, the vision does not mention developing local infrastructure to support this growth. There should be an expansion to the reference to the Strategic Growth Plan (SGP), in that the SGP seeks to shift the emphasis of future planned growth in the L&L HMA to the south and east of Leicester, and that this is in part due to the existing infrastructure constraints to the north and west of Leicester which has been the focus of planned and speculative growth in recent decades.</p> <p>Whilst the CHA has no particular issues with the vision, it is perhaps surprising that it is the first place in which reference is made to the Strategic Growth Plan (SGP). Earlier reference to the SGP, perhaps in the introductory text, or possibly better still as a separate section, would be useful in terms of setting the context for this Plan's development, and in particular highlighting that the shift in emphasis of growth at the Housing Market Area (HMA) level going forward beyond this Plan – i.e. to the south and east of Leicester – is in part due to the considerable existing infrastructure pressures (transport and otherwise) faced in seeking to continue to deliver substantial further growth to the north and west of Leicester. Including such reference would be helpful in setting a basis for the transport challenges faced in developing and seeking to deliver this Local Plan.</p>

Additionally, it might be useful to set out early in the document how the Covid19 pandemic has impacted on the Borough and the role that the Local Plan has in aiding the area's recovery.

P.11 – “A number of deprived communities in the Borough with lower than average incomes, poor health and lower levels of educational attainment” – This could be expanded to ‘deprivation causing *inequalities in...*’ and the impact on life expectancy.

P.11 – “Increasing volumes of traffic and pressure on infrastructure including schools, health centres, open spaces and utilities’ – This could be expanded to make reference to the impact on air quality.

P.12 - “Development will have been managed to improve the economy, quality of life and the environment’ – This misses a key opportunity to mention health, with quality of life strongly linked to healthy life expectancy years. 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 will not 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.

P.12 - “Our strong and diverse economy will provide more employment opportunities for local people including higher skilled, better paid jobs in high technology research and manufacturing, sports, tourism, creative and cultural industry clusters” - The ambition of the Government in the 25 Year Environment Plan is to achieve a circular economy. In such an economy, repair and remanufacturing will be key to keeping materials and products in use for longer at their maximum value. As such the appropriate skills in these sectors will need to increase. Therefore, reference should be made to such jobs in this vision statement.

There is also the opportunity to reference provision of *good work*, which is strongly linked to health. “*Being in good work is better for your health than being out of work. ‘Good work’ is defined as having a safe and secure job with good working hours and conditions, supportive management and opportunities for training and development. There is clear evidence that good work improves health and wellbeing across people’s lives and protects against social exclusion.*” Source: [Health matters: health and work - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/consultations/health-matters-health-and-work)

P.12 – “Growing businesses...” - Any reference to growth should be framed as sustainable growth – again in a circular economy growth represents the decoupling of resource use from economic growth so stressing growth will be sustainable is recommended.

P.12 – “Charnwood will be known for its natural and built environment which provides a place that people want to visit and explore. Our communities will have access to a range of green spaces, leisure and recreational facilities across Charnwood and new

parkland in Loughborough and Thurmaston will be provided. Charnwood Forest will be recognised as a Regional Park” - It is important that tourism in Charnwood is sustainable. Parts of the Charnwood Forest area (Bradgate Park & The Outwoods in particular) are over toured and the natural landscape is being damaged by high visitor numbers. The infrastructure, especially car parking, is unable to sustain the volume of visitors and sustainable transport options to visitor sites in the Charnwood Forest area need to be considered.

P.12 - *“Delivering growth to a high design quality that benefits our communities.”* – This could include reference to low/zero carbon, more environmentally sustainable development. Or add ‘that benefits our communities and the environment.’ Also, there is an 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.

P.12 – *“Our landscape and the special buildings, heritage and biodiversity it contains will be in a good state.”* – it is not made clear how that ‘good state’ will be defined or measured.

P.12 – *“Charnwood will be a place that promotes health by design with developments that have the connectivity and open spaces where active travel is desirable.”* - Health by design is about much more than active travel and needs to be a more explicit part of the vision.

P.13 – *“The town will have benefitted from regeneration which capitalises on our industrial heritage including the Great Central Railway and 13 the Grand Union Canal. The town centre will be an attractive, compact and walkable destination for shopping, leisure, entertainment and culture.”* – It is also worth mentioning the Loughborough Bellfoundry Trust that has secured Lottery Funding to support its ambitious development plans. Visitor attractions need to be linked, and wayfinding improved, to help visitors navigate a route to the GCR and Bellfoundry site from the town centre.

Heathland could be expanded but on its own, plays a small part in carbon reduction as a habitat provision for carbon sequestration with ecosystem services. Reference can be made to Action for Nature and Heathland data. In addition, there is no mention of the value of wetlands (Marginal river habitat in terms of their ability to store and sequester carbon such as those habitats along the River Soar).

There is welcome recognition of the challenge to provide homes for those unable to get onto housing ladder – social housing/ accommodation for homeless people and affordable/social rent requirements.

	<p>There is agreement that reducing car travel is important for tackling climate change, but also for community interaction and social capital development.</p> <p>The community commitments of the Strategy could be supplemented to include a commitment to building social capital – community interaction and mutual support including between different communities which can be supported by good design and facilities that encourage contact and mixing.</p> <p><u>Comments from Strategic Property Services in respect of the County Council’s interests as a Landowner</u></p> <p>The vision could be improved with a further paragraph, “The vitality of our Services Centres will be maintained and enhanced by the provision of additional high-quality housing and business opportunities to support their continued role as thriving self-sustaining communities”.</p>
Objectives	<p>The narrative makes reference to the unmet needs of Leicester City and the potential to review housing numbers at an early date following the agreement on the Statement of Common Ground which is supported. The plan proposes a 10% uplift in housing numbers to provide flexibility. It is assumed that this modest uplift over the standard method requirement, although welcome, will only take account of the potential for additional growth within the Borough during the plan period.</p> <p>Whilst the need to reduce car travel and to increase levels of cycling, walking and passenger transport use are important to accommodating/mitigating the impacts of the growth, the Plan text currently underplays the evidence-based situation in respect of the likely overall scale of the transport package necessary to enable growth going forward in the Borough of Charnwood, especially in respect of the Strategic Road Network.</p> <p>It is suggested that it might be more appropriate in the circumstances to have a separate set of transport objectives, which inter-alia, could include an objective around CBC working in partnership with relevant transport bodies and Plan making bodies to ensure a coordinated and strategic approach to the delivery of transport measures required to enable further growth, and also to help to emphasise the need to ensure the transport network enables Charnwood to continue to grow.</p> <p>It is also suggested that the objectives should be stronger in respect of the climate emergency and decarbonisation agenda.</p> <p>There is no mention about local infrastructure and how this is to be developed to meet the needs of the local residents through all of the growth that is proposed.</p>

It would be helpful to see consideration around reduction in health inequality mentioned.

P.13 - Development Strategy 1: *“Loughborough, to capitalise on its rich history, to support the town centre, and for the town to continue to be the main economic, social and cultural heart of the Borough and an attractive, compact and walkable destination for shopping, leisure, entertainment and culture”* – specific reference to tourism could be made here.

P.14 - Development Strategy 3: *“seeking high environmental standards in all development”* - the intent should be to **‘ensure** high environmental standards in all development’

P.14 - Society 8: *“To assist our communities in their engagement with neighbourhood planning and use Neighbourhood Plans as appropriate to inform planning decisions.”* – this is supported. The inclusion and importance of NPs is welcomed.

It is suggested that a Social Value Statement could be made a requirement for major developments and potentially added as a Plan indicator. Promoting a culture of inclusiveness and a strategic approach can be included within the Community Element.

P.14 - Environment 1: *“To promote the **prudent use** of resources and reduction of waste through patterns of development, design, transport measures, reducing the use of minerals, energy and water, minimising waste and encouraging recycling”* – ‘Prudent use’ is an odd phrase to use; the Government’s Resources and Waste Strategy published in 2018 focuses on resource efficiency and resource productivity. Using language which aligns with this national strategy is recommended so as not to cause ambiguity and ambition that sits outside that of the general direction of Government. Also, the Government has just consulted on the Waste Prevention Programme for England which (again in line with their ambition to shift to a circular economy) aims to raise the management of waste up the hierarchy whereby waste prevention and reuse sits above recycling. This should be acknowledged and picked up in these environmental objectives. Alternative wording could therefore be: ‘To promote resource efficiency, waste prevention and reduced waste arisings through patterns of sustainable development, circular economic design, transport measures, reducing the use of minerals, energy and water, preventing and minimising waste and encouraging reuse before recycling’.

P.15 - Environment 3: *“To protect and enhance the range of habitats and species found in Charnwood, seek to deliver biodiversity gain and reverse habitat fragmentation and the recovery of ecological networks’* - In recovery of ecological networks this may mean that habitat *creation* is required and not just enhancement and protection of existing habitats. This may mean creating new spaces for nature after opportunity mapping identify where this can be done.

	<p>P.15 - Environment 9: “To make efficient use of land, to limit the need for greenfield development and encourage the re-use of brownfield land and underused buildings” - could recognise the potential for some brownfield sites to contribute through good design to nature conservation and important species that colonise brownfield sites. These sites are also vulnerable to Climate Change as per the Natural England Climate Change Habitat Vulnerability mapping.</p> <p>P.15 - Economy - there should be reference to the circular economy to align with the Government’s ambition and current direction. Recommend officers appraise themselves with the aims and objectives of the Resources and Waste Strategy 2018 and Proposed Waste Prevention Programme which has just been consulted on.</p> <p>P.15 - Economy 3: ‘To sustain and enhance Loughborough town centre as a prosperous, attractive and vibrant destination for shopping, entertainment and leisure as well as a place to live.’ – in addition, tourism as a destination, with its attractions could be specifically referenced here.</p> <p><u>Comments from Strategic Property Services in respect of the County Council’s interests as a Landowner</u></p> <p>The narrative makes reference to the unmet needs of Leicester City and the potential to review housing numbers at an early date following the agreement on the Statement of Common Ground which is supported. The plan proposes a 10% uplift in housing numbers to provide flexibility. It is assumed that this modest uplift over the standard method requirement, although welcome, will only take account of the potential for additional growth within the Borough during the plan period.</p>
Development Strategy	
<i>General Comment</i>	<p>The chapter text should be stronger in setting out how evidence has played a part in driving decisions to arrive at the proposed development strategy; for example, early transport evidence was a determinate in arriving at the overall scale of housing growth that the Plan would set out.</p> <p>This is suggested because it would further add context in respect of the transport challenges faced in continuing to accommodate further growth to the north and west of Leicester and in Loughborough/Shepshed.</p> <p>In that context, whilst locating development in ‘sustainable’ locations and seeking to maximise levels of walking, cycling and passenger transport usage are certainly keys to accommodating/mitigating the impacts of the growth, the Plan text currently underplays the evidence-based situation in respect of the likely overall scale of the transport package necessary to enable growth going forward in the Borough of Charnwood, especially in respect of the Strategic Road Network.</p>

	<p>It is suggested that amplifying matters early in the Plan should be helpful in establishing the narrative (which should run as a core through the document) for the transport partnership-working journey that we (the Plan making authority and the local and strategic highway authorities) have been on; are still on; and that will continue well-beyond the Local Plan's adoption, reinforcing that we have a coherent and realistic approach to dealing with the substantial transport challenges faced with accommodating growth in the Borough (and elsewhere in adjoining areas).</p> <p>Reference to the SGP in the first complete paragraph gives a 'peg' in respect of our comment on page 13, but it does not really provide the early context setter than it is suggested should be provided in the Plan.</p>
<p>Policy DS1: Development Strategy</p>	<p>Regarding the development strategy, the scale of growth proposed is fine with Standard Method (December 2020) taken as the starting point and 10 % contingency added. The spatial distribution is mostly fine. There is support for foci to north of Leicester (reinforcing 'Our Central City'), Loughborough (market town contributing significantly to the L&L economy, including entertainment and leisure offer) and Shepshed (regeneration and role within Leicestershire International Gateway). Would have preferred less development to have been directed to service centres and 'other' settlements (currently 5%), though understand the scale of growth to service centres and 'other' settlements is as per the previous draft Local Plan (2000 dwellings) with a greater proportion directed to Anstey and Barrow to support education provision.</p> <p>Whilst the Plan is described as being founded on a principle of urban concentration and intensification, nevertheless nearly 20% of the housing growth is proposed to be in either a 'Service Centre' or 'Other Settlements'. It can be challenging and costly to provide those living in such areas with access to jobs, services and facilities the urban areas; the transport evidences shows trips drawn to Loughborough and Leicester.</p> <p>Furthermore, even in the urban areas, the housing growth proposed in the Local Plan in on sites of a sub-sustainable urban extension scale, meaning a likely low level or trip self-containment.</p> <p>As a result of the proposed pattern of development, the transport evidence shows a wide pattern of impacts across the Borough, impacts often leading to the use of less appropriate, lower order roads with potential implications for road safety and/or the communities living along those roads.</p> <p>In some cases, these impacts are likely to be the result of existing network issues and in some cases the result of cumulative impacts of different sites. Whilst the CHA accepts that addressing such issues would be beyond what it would be reasonable (in planning terms) and/or affordable (in viability terms) for an individual site, nevertheless the causes of the impacts and who should pay for them to be resolved are likely to be of little concern to those affected; they will simply look to the relevant highway</p>

authority to deal with the impacts. This simply adds further weight for the need for a continued, cohesive, structured, strategy-led approach to the development of and securing the funding to deliver the package of highways and transport measures that will be required to support and enable growth across the Borough and ensuring that the Plan as adopted is properly reflective of this and provides as strong as possible policy platform for seeking funding.

Regarding employment and retail, in addition to LS&EP (73ha) the majority of new employment land will be delivered as part of three SUE's and Watermead Business Park with smaller proportion allocated in Shepshed and to north of City. Strengthens further (beyond housing delivery) the need to support delivery of the SUE's to bring employment land forward in timely manner. More emphasis is required on the evolving role of town centres, as hubs of activity for leisure, commerce, and tourism further to the diminishing traditional retail focus with growth in online shopping. The identified retail capacities should be reviewed to ensure they are still relevant post-pandemic with the switch to on-line sales and closure many high street chains resulting in a large number of large units in Loughborough Town Centre.

The inclusion within Policy DS1 of criteria to meet in circumstances where a five-year land supply cannot be demonstrated, is supported. There is particular support for the third criterion, to not prejudice the delivery of infrastructure set out in Appendix 3.

There is no mention of supporting sustainable development that doesn't contribute to an increase in carbon emissions or development that is not impacted by the effects of climate change.

P.16 - *“Access to jobs, services, infrastructure and sustainable travel options”* – healthy lifestyles could be referred to here.

P.16 - *“However, there is recognition that encouraging more people to adopt active lifestyles is an important public health objective.”* – it is suggested that the word 'active' is replaced with 'healthy'.

P.24 – *“The overall spatial strategy ...is urban concentration and intensification.”* – it is important for the local plan to clearly identify cumulative impacts on the most environmentally sensitive areas and ensure that appropriate mitigation to offset those impacts is secured. If concentration of development is towards urban areas, how will development then contribute to rural access to the countryside and biodiversity net gain?

P.27 - Reference to *“supporting healthy lifestyles and access to health-related services”* could be added to the Policy wording.

Comments from Strategic Property Services in respect of the County Council's interests as a Landowner

	<p>Given the nature and settlement structure across the Borough, the distribution of New Homes is logical as it concentrates development in a manner that maximises the delivery of infrastructure although the allocation to Service Centres appears low. However, any further housing need arising from the City's unmet need should be distributed in a manner that maximises the sustainability of the Service Centres and compliments the delivery of services.</p> <p>The delivery of further employment and retail development to Service Centres is supported as it will enhance the sustainability of the settlements and potentially reduce the need for car travel.</p> <p>The strategy relating to unallocated sites and their future development is noted and will be addressed in the promotion of individual County Council owned sites.</p> <p>The allocation of 8951 additional new homes should be regarded as a minimum.</p>
Policy DS2: Leicester and Leicestershire Unmet Needs	<p>Policy DS2 forms the Local Plan review trigger policy and entails Charnwood Borough Council publishing a review of the Local Plan within 6 months of the agreement by all partners of the Statement of Common Ground (SoCG) dealing with apportionment. An amendment to strengthen and ensure the intent of the policy is achieved, is suggested. The wording of the policy could be amended to refer to the SoCG being published for consideration through respective governance processes rather than agreement, to avoid the situation where a single partner withholding agreement could halt the review of the Charnwood Local Plan. Or refer to agreement by 'majority' rather than 'all' partners.</p> <p>The Local Plan review trigger is highly likely to be utilised given the expected publication of the SoCG dealing with the apportionment of unmet need in late 2021/early 2022 following the completion of strategic evidence (Strategic Growth Options and Constraints, Housing and Employment Needs Assessment (HENA), Strategic Transport Assessment and Sustainability Appraisal of the increased unmet need) currently being undertaken on behalf of Charnwood Borough Council, the County Council, and other partners in the Leicester and Leicestershire Housing Market Area (L&L HMA).</p> <p>There is also a need to consider broadening out the Local Plan review trigger policy to cover 'other significant changes in circumstances' which may trigger a Local Plan review, such as if Highways England support is not forthcoming.</p> <p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>The policy is seen as basically sound, however by the identification of reserve sites within this plan the additional allocation</p>

	<p>process could be considerably shortened thereby safeguarding the Borough’s position regarding the need to maintain a 5-year housing land supply. Such a measure would provide greater certainty whilst being seen as maintaining a flexible approach.</p>
<p>Policy DS3: Housing Allocations</p>	<p>In respect of the main policy, the same comments apply as per the CHA’s comments on Policy DS1.</p> <p>In respect of the policies relating to the specific sites, the CHA notes that they vary in structure and content and contain varying levels of (relative) detail. Whilst the CHA is not expressing a view as to whether this is ‘right’ or ‘wrong’, In particular, the policies in some cases seek to deal with the cumulative impacts of growth on educational infrastructure. The CHA would be concerned if this disparity were to create a misleading impression about the need also to secure developer contributions towards addressing any cumulative transport impacts across the Borough (including infrastructure and enhancements to passenger transport and walking and cycling provision). The CHA would ask that changes be made to the Plan to avoid such an impression. (This comment should also be read in particular with the CHA’s comments on Place Based Policies and CC5 and INF1 and 2.)</p> <p>Furthermore, Policy DS3 could be helpfully strengthened to ensure a comprehensively master-planned (and thereby coordinated) approach is taken to key clusters of adjacent sites. In particular this applies to:</p> <ul style="list-style-type: none"> o Sites to the south and east of Syston – HA1/HA2/HA3 and possibly also HA5, HA7 and HA8 o Sites to the south-west of Loughborough – HA16/HA17/HA19 o Sites to the east of Shepshed – HA32/HA34 and possibly also HA31 o Sites to the south of Shepshed – HA39/HA40/HA41 o Sites to the north of Queniborough – HA64/HA65 <p>Grouping the above clusters of sites together to create ‘mini SUEs’ through a requirement for collaboration/joint master-planning would allow a more coordinated approach to securing the transport infrastructure/mitigation required to support the delivery of these sites (e.g. in terms of internal spine roads and/or walking and cycling routes, public transport services, joint site access points and off-site mitigation), helping to reduce the challenges posed by the relatively ‘scattered’ spatial nature of the Local Plan (i.e. spread across relatively smaller/mid-sized sites rather than concentrated at large SUEs).</p> <p>It is noted that a significant number of housing sites have been allocated, helping to provide good positive planning and clarity at the outset of the developer contributions sought. It is also noted that a few allocated housing sites have had their site capacity reduced to enable key Green Wedge functions to be retained as part of development, e.g. Policy DS3 (HA12) Land at Gynsill Lane and Anstey Lane, Glenfield. This approach is supported.</p>

It is noted that several of the site allocations require the submission of a masterplan for the development of the site to accompany the outline applications for the delivery of the sites. Some of the allocations are large, important sites and it is queried whether the receipt of a masterplan to accompany an outline planning application provides sufficient safeguards for the development of the site. Perhaps for some of the larger sites, these should be SPD documents which have adopted status and are consulted on so that all infrastructure providers can be sure that what they have asked for can be delivered.

It is also noted that a number of the allocated sites will deliver new schools and it is important to ensure that the requirements noted in the policies match that required by the education team.

Within this section there isn't any mention of Health Impact Assessment (HIA). There could be reference made to HIA of masterplans, like those currently being worked on jointly with Blaby and NWL. Reference to this, at the very least for large settlements, would be advantageous.

It is recognised that the following allocations are located on sites which are within minerals safeguarding areas for sand and gravel:

- HA1, 2, 3, 4, 5, 6, 7, 14, 15, 31, 32, 33, 34, 35, 48, 49, 53, 59, 64, 65, 67 and 68.
- HA30 is located on a site which is within an igneous rock safeguarding area.
- HA39 is located on a site which is within a brick clay safeguarding area.
- HA40 is located on a site which is within a brick clay and igneous safeguarding area.
- HA45 and 46 are located in a gypsum safeguarding area.
- HA49 is within a gypsum and sand and gravel safeguarding area.

It should be noted that brick clay, igneous rock and gypsum are scarcer resources both nationally and within the County.

P.36 - '(HA7) Land off Barkby Thorpe Lane - include an appropriate width of landscaping and **appropriate** extensive tree planting...'. Species permeability of landscape should be ensured through appropriate lighting and design of development.

P.36 - '(HA12) Land at Gynsill Lane and Anstey Lane' – There are cross boundary implications for management of verges, trees etc.

Comments from Strategic Property Services in respect of the County Council's interests as a Landowner

The totality of housing allocations across the settlement hierarchy matches the distribution detailed at Policy DS1. Further, it is

	<p>noted that there are no specific allocations to individual settlements across the Service Centres. Whilst this allows flexibility in the delivery of those homes and enables greater weight to be placed on identified constraints to development and the need for preserving the integrity of individual settlements a balance needs to be achieved that supports the sustainability of all those settlements. Accordingly, the allocation of 75 homes (4% of the total Service Centre allocation) at Quorn appears disproportionately low when compared to other settlements with a comparable range of facilities and services. Whilst the allocated site HA50 appears deliverable in the event of it not being brought forward or the future needs of the village increasing the potential exists for a shortfall in housing delivery within Quorn necessary to support the continued provision of services and maintain sustainability. Further, in order to meet the potential increase in housing requirements resulting from additional growth or the unmet needs of Leicester City and provide additional resilience of housing supply further sites should be allocated within Quorn to ensure the village remains a vibrant thriving community .</p> <p>The opportunity exists through the allocation of the Land at Farley Way to deliver a limited amount of additional much needed housing, together with additional community facilities and open space in a sustainable location, adjoining existing development, inside the line of the A6 (which would then form the logical Limits of Development) on a site within easy walking or cycling distance of the village centre with good access and where any potential constraints to development can be mitigated. The site is both available and deliverable having a both willing landowner and strong developer interest.</p>
<p><i>Site HA12 (Land at Gynsill Lane and Anstey Lane, Glenfield)</i></p>	<p>The wording for site HA12 currently refers to the need for <i>“a masterplan to be agreed which includes delivery and phasing arrangements for the whole allocation, in order to achieve comprehensive development”</i>. Whilst this is welcomed, neither the policy nor the supporting text and plan refer to the fact that this site is part of a wider ‘cross-boundary’ development proposal and accordingly, the need for the masterplan to cover this wider ‘cross boundary’ proposal in its entirety to ensure that development comes forward in an appropriate form/with the necessary supporting infrastructure/mitigation.</p>
<p><i>HA18 (Land to r/o Snell’s Nook Lane, Loughborough)</i></p>	<p>The wording and accompanying diagram for site HA18 refer to a safeguarded potential future access route through the site to Loughborough Science and Enterprise Park. The supporting justification/evidence for the inclusion of such in the policy is matter for CBC; but, from its perspective the County Highway Authority (CHA) is not aware of any specific proposals for such a route and also notes that the safeguarded route ends in a dead end at the south eastern corner of the site, without any indication as to how the gap to Nanpantan Road would be bridged to complete a connection. The CHA would also want to see evidence as to the potential traffic impacts of such an access route, particularly in respect of any impacts of it encouraging additional traffic to use Nanpantan Rd/Snell’s Nook Lane instead of the A512. Such evidence would need to be considered in the context of a wider coordinated and strategy-led approach enabling the future growth of Loughborough/the Borough more widely.</p>
<p>Policy DS4:</p>	<p>P.67 - HIA as part of a clear process of health considerations within the planning process adds to place-making guidance such as</p>

Employment Allocations	<p>'Building for a Healthier Life'. Adding the local health profile around inequality and need to these best practice guidance aspirations adds depth and value to any considerations around making a place more 'healthy', as it considers those accessing the place and their needs.</p> <p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>In considering the allocation of employment land, consideration needs to be given to the provision of employment and business opportunities within or adjacent to all Service Centres in order to support economic growth and reduce car travel. In order to provide a flexibility to the current approach there ought to be a general presumption support employment growth in all major settlements.</p>
Policy DS5: High Quality Design	<p>The use of independent design reviews for strategic or sensitive development proposals and reference to expectation that they will be funded by the applicant, is supported.</p> <p>There should be mention of places providing 'Space for Nature' as well as being 'attractive'. This can then be explored in more detail in Design Codes.</p> <p><i>P.67 – “We will require new developments to make a positive contribution to Charnwood. Providing attractive appropriate and functional places where people will want to live, work and visit”. - Should add 'whilst meeting the current and future needs of the stakeholders in a sustainable and creative way.'</i></p> <p>High quality design – it is suggested that a reference is incorporated as to how this can also facilitate community interaction and social action – movement on foot, meeting places etc. It is particularly important to ensure spaces are accessible to everyone.</p> <p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>This policy is supported.</p>
Place Based Policies	
Policy LUA1: Leicester Urban Area	<p>Reference in the policy to ensuring the timely and coordinated delivery of infrastructure and improving connectivity and accessibility by walking, cycling and public transport are welcomed. However, that the two aspects are split within this policy and across Policies INF1, INF2 and CC5 does little really to support the need for a coordinated, structured, strategy-led approach to addressing the transport impacts of growth across the Borough.</p>

	<p>As per comments on the Vision, whilst reference here to the Strategic Growth Plan is welcomed, it should be referenced closer to the beginning of the document to ensure its importance and relation to the Plan is emphasised.</p> <p>P.69 - <i>“The River Soar and Grand Union Canal stretch from the centre of the city into Charnwood and provide recreational opportunities along their length, notably at Watermead Country Park”</i> - Watermead is mentioned but it is also important to note that there are other reserves in the area important to Wildlife such as those belonging to the Wildlife Trusts and others (not in the public sector) but also of value in terms of ecological connectivity along the River Soar and also opportunities for recreation. Charnwood has a strong waterways tourism and leisure offer with Barrow Boating, Pillings Lock Marina, waterside pubs at Mountsorrel, Barrow on Soar and Birstall and the Let’s Get Lost Leicester waterways experiences.</p> <p>P.69 – <i>“Thurmaston, Syston and Birstall also individually provide a full range and choice of services and facilities to residents. These settlements all have a secondary school and more than one option available to residents for a range of services including food shops, primary schools, doctor’s surgeries, pharmacies and cash machines”</i> - with Thurmaston having some of the most deprived households in the Borough what can the Local Plan add to considerations about the access to services and health offer of things like food shops. What are the choices?</p> <p>Regarding Sustainable Travel, the East Midlands Railway line linking Barrow and Loughborough (the former Ivanhoe line) offers tourism potential if the heritage, points of interest and distinctive character of each location can be made more visible.</p> <p>There is an independent retail offer, complemented by a quality food and drink offer, across the Charnwood area, particularly in Quorn, Rothley, Anstey, Mountsorrel. There is however, no mention of the niche retail offer that has developed in Rothley and Quorn that is above the standard food offer.</p> <p><u>Comments from Strategic Property Services in respect of the County Council’s interests as a Landowner</u></p> <p>These policies are seen to be appropriate to the circumstances of the individual locations and development proposals with policy LUC3 being strongly supported.</p>
Policy LUA2: North East of Leicester Sustainable Urban Extension	It is understandable that this policy reflects the past history of this site. Nevertheless, as the Local Plan in now proposing additional growth in and around the same area, the Plan should be clearer as to what contributions if any this site will provide towards the delivery of an overall transport package that deals with any cumulative impacts of growth, both within the Borough but also reflecting growth proposals coming forward in adjoining areas.

	<p>In areas where flooding or drought/development causes a loss of flood plain habitat, refuge should be provided to species impacted.</p> <p>The reference to SUE's and utilising alternative transport is positive as there is a need for cycling and walking for leisure use to link these new areas into Charnwood Forest, Watermead and the Grand Union canal.</p> <p>P.77 - The wording of the 4th bullet should be changed to <i>“Supporting the provision of gigabit capable broadband infrastructure for all homes and businesses in Leicestershire in accordance with Policy E3”</i>.</p> <p>P.88 - In the ‘communities section’ the bullet should be replaced with <i>“Supporting the provision of gigabit capable broadband infrastructure for all homes and businesses in Leicestershire in accordance with Policy E3”</i>.</p>
Policy LUA3: North of Birstall Sustainable Urban Extension	<p>It is understandable that this policy reflects the past history of this site. Nevertheless, as the Local Plan in now proposing additional growth in and around the same area, the Plan should be clearer as to what contributions if any this site will provide towards the delivery of an overall transport package that deals with any cumulative impacts of growth, both within the Borough but also reflecting growth proposals coming forward in adjoining areas.</p> <p>In areas where flooding or drought/development causes a loss of flood plain habitat, refuge should be provided to species impacted.</p>
Policy LUC1: Loughborough Urban Centre	<p>Reference in the policy to ensuring the timely and coordinated delivery of infrastructure and improving connectivity and accessibility by walking, cycling and public transport are welcomed. However, that the two aspects are split within this policy and across Policies INF1, INF2 and CC5 does little really to support the need for a coordinated, structured, strategy-led approach to addressing the transport impacts of growth across the Town/Borough.</p> <p>Consultation with the Local Flood Authority should also be key not just the Environment Agency.</p> <p>The role of Loughborough Town Centre to support retail and leisure welcomed however there is question mark around the need for additional retail space on Baxter Gate given the recent changes to retail.</p> <p>P.90 - <i>“The Tourism Blueprint for Charnwood recognises the tourism potential of our industrial past and its key heritage attractions such as the Great Central Railway, the Grand Union Canal and Taylor’s Bell Foundry and Museum and the opportunity for a</i></p>

	<p><i>heritage trail is being investigated</i>” – This could also reference the Leicestershire Tourism Growth Plan 2020 – 2025 which identifies the Charnwood Forest area and Loughborough as one of seven key visitor hubs in the County and identifies the importance of the GCR “bridging the Gap” project to create a continuous 18 mile heritage railway line and new visitor attraction at North Terminus.</p> <p>P.91 - <i>“The Loughborough Bell Foundry Trust is restoring key parts of the historic Grade II* Listed Taylor’s Bell Foundry to enhance the commercial operation and attract more visitors.”</i> - Visitors will need help with wayfinding to locate the Foundry if arriving on foot or bike from the town centre. Car parking is restricted in the residential area in which the foundry is situated, and provision should be made for coaches bringing groups.</p> <p>P.95 - <i>“conserves and enhances the heritage and tourism value of Loughborough’s Industrial Heritage Quarter and its heritage assets, including the Great Central Railway, Grand Union Canal and Taylor’s Bell Foundry, in accordance with Policy EV8 including: o proposals to reconnect the northern and southern sections of the Great Central Railway and associated infrastructure; o requiring development adjacent to the Grand Union Canal to provide an active waterfront with public access;”</i> - An Industrial Heritage Quarter will improve the visibility of some of Loughborough’s key tourism assets and would be very welcome.</p>
Policy LUC2: West of Loughborough Sustainable Urban Extension	<p>It is understandable that this policy reflects the past history of this site. Nevertheless, as the Local Plan in now proposing additional growth in and around the same area, the Plan should be clearer as to what contributions if any this site will provide towards the delivery of an overall transport package that deals with any cumulative impacts of growth, both within the Town/Borough but also reflecting growth proposals coming forward in adjoining areas.</p> <p>This scheme will require substantial infrastructure including new road links through the town and enhanced public transport. No mention is made here of how these will be funded for their delivery and whether the intention would be via S106 agreements. Perhaps it would be better if clarity was given on this point.</p>
Policy LUC3: Loughborough Science & Enterprise Park	<p>It is understandable that this policy reflects the past history of this site. Nevertheless, as the Local Plan in now proposing additional growth in and around the same area, the Plan should be clearer as to what contributions if any this site will provide towards the delivery of an overall transport package that deals with any cumulative impacts of growth, both within the Town/Borough but also reflecting growth proposals coming forward in adjoining areas.</p>
Policy SUA1: Shepshed Policy	<p>Reference in the policy to ensuring the timely and coordinated delivery of infrastructure and improving connectivity and accessibility by walking, cycling and public transport are welcomed but there is no mention of how this is expected to be funded. The fact that the two aspects are split within this policy and across Policies INF1, INF2 and CC5 does little really to support the</p>

	<p>need for a coordinated, structured, strategy-led approach to addressing the cumulative transport impacts of growth across the Town/Borough.</p> <p>There is a good section on retailing in Shepshed, however it is questioned, given the amount of new housing whether the food offer is sufficient to bring these people into the centre.</p> <p>The area has several significantly important sites for conservation including LNR's, SSSI, RIGs, Ancient woodland etc. There should be greater consideration of these sites and maintaining appropriate buffers and habitat continuity, and addressing the INN's problem along the Blackbrook and associated tributaries. Could be links to L&RWT 'Saving he Soars Species' e.g. water vole? There should be consideration around improving the water quality in failing areas as per the EU Water Framework Directive. There should be consideration for local designation such as LWS and their role locally for wildlife & community value, and habitat enhancement for reptiles, as well as retaining key habitat and features used for basking and refuge.</p>
<p>Policy SC1: Service Centres</p>	<p>It is noted in explanatory text that one of key issues is the provision of homes within safe walking distance of a primary school. Two new schools (Anstey and Barrow) and school extension (Cossington, also to serve housing growth in Sileby) are proposed. It is noted that the housing allocations are largely focused in three of the Service Centres to ensure that new or extended primary schools can be secured as part of the new development.</p> <p>Reference in the policy to ensuring the timely and coordinated delivery of infrastructure and improving connectivity and accessibility by walking, cycling and public transport are welcomed. However, the fact that the two aspects are split within this policy and across Policies INF1, INF2 and CC5 does little really to support the need for a coordinated, structured, strategy-led approach to addressing any cumulative transport impacts of growth across the Borough, including interactions between growth in the Service Centres and Loughborough and Leicester.</p> <p>The references to required/target walking distance in this policy (800m) is contradictory to Policy CC5 Sustainable Transport (400m). The policies should align with the Leicestershire Highway Design Guide standards/thresholds unless clear evidence is presented to justify a more ambitious target and demonstrate how this will remain viable in the long-term (i.e. once any developer subsidy of a passenger transport service ends).</p> <p>(NB – the policy CC5 monitoring target/indicator in Appendix 1 (page 210) reflects the 400m threshold set out in CC5 and would also need to be reviewed in response to this.)</p> <p>Clear reference is made here that planning obligations are required to deliver two new schools and an extension to the third.</p>

	<p>P.116 - <i>“We will encourage development which supports the vitality and viability of the Local and District Centres and seek to enhance their unique characteristics in terms of their heritage and diversity of uses”</i> - This is particularly welcome. The Service Centres have potential to support tourism with their accommodation offer (character hotels like Quorn Grange, Rothley Court, high quality B&Bs like Horseshoe Cottage Farm), range of attractions (GCR, waterways offer, Stonehurst family farm etc) and quality independent retail and food & drink offer (Mountsorrel hosts the only Michelin star restaurant in Leicestershire). It is important that the character of these villages (many of whom feature buildings constructed from local stone) is retained to maintain their distinctive appeal.</p> <p><u>Comments from Strategic Property Services in respect of the County Council’s interests as a Landowner</u></p> <p>Subject to the comments made in respect of Policies DS1, DS2, particularly DS3 and DS4 above the policy is supported. It is also noted that the site currently allocated at Quorn (East of Loughborough Road) would be contrary to Policy EV3 whereas the County Council’s site at Farley Way has the potential to be fully policy compliant and is both available and deliverable.</p>
Policy OS1: Other Settlements	<p>An expanded primary school at Cossington is included within the Policy and other criteria is as anticipated, for lower order settlements in settlement hierarchy. There is reference to the need for new infrastructure through policy INF1 which deals with this topic.</p> <p><u>Comments from Strategic Property Services in respect of the County Council’s interests as a Landowner</u></p> <p>This Policy is supported</p>
Policy C1: Countryside	<p><u>Comments from Strategic Property Services in respect of the County Council’s interests as a Landowner</u></p> <p>This Policy is supported</p>
Housing	
Policy H1: Housing Mix	<p>There is a suggested policy addition – <i>“To support the development of dwellings suitable for single people including those with frailties and disabilities including bungalows, one-bedroom flats and wheelchair accessible single person units.”</i></p> <p>There is mention of viability here and there could be a potential impact on county infrastructure.</p>

	<p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>Housing mix is based on latest evidence and therefore supported.</p>
Policy H2: Housing for Older People and People with Disabilities	<p>There is a suggested policy addition – <i>“To consult with and work in partnership with Leicestershire County Council, Adults and Communities Department in planning for future demand and associated types of housing for Older People and for People with Disabilities inc. physical, sensory, learning and mental health disabilities including Extra Care Housing, and specialist supported living.”</i></p> <p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>This policy is supported.</p>
Policy H3: Internal Space Standards	<p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>This policy is supported.</p>
Policy H4: Affordable Housing	<p>The policy 30% affordable housing from all major housing sites with exception of brownfield (10% affordable housing) is supported.</p> <p>Viability mentioned in that affordable housing provision has been calculated on a strategic viability basis for the whole plan. Policy H4 does mention that should an individual developer try to argue that a specific site isn't deliverable, then they must go through the viability exercise with the outcome independently reviewed. The approach to be adopted is clear, but will have an impact on County infrastructure at the expense of delivering affordable housing where the residents are likely to need the infrastructure that won't be delivered as part of the scheme.</p> <p>P.129 – <i>“In order to seek 10% of homes to be available for affordable home ownership on greenfield sites...”</i> – should this figure read 30%?</p> <p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>Policy H4 should be caveated by the addition of the words <i>“up to”</i> in respect of the proposed percentages. It is noted that the level of affordable housing can take account of the viability of individual sites in order that delivery of the housing is not compromised which is supported.</p>

Policy H5: Rural Exception Sites	<p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>This policy is supported.</p>
Policy H6: Self-build and Custom Housebuilding	<p>The Policy makes it clear that affordable housing contributions for self-build aren't required. The Plan is silent however, on whether other contributions are still to be sought which again could impact on the county's infrastructure.</p> <p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>The provisions of this policy are supported in particular the final paragraph in respect of plots where no market demand can be found.</p>
Policy H7: Houses in Multiple Occupation	The policy to manage proportion of HMOs in and outside of Loughborough is supported.
Policy H8: Campus and Purpose Built Student Accommodation	No comment.
Policy H9: Gypsies, Travellers and Travelling Show people	<p>Reference to working with other LAs in L&L to identify and bring forward sites in areas of greatest need for transit provision (north-west of the County), an identified shortfall, is welcomed.</p> <p>There is reference to infrastructure, but not on how the policy will impact on local infrastructure, especially that maintained by the County Council such as the local schools.</p>
Employment	
Policy E1: Meeting Employment Needs	<p>The policy intent is as anticipated (support for expansion of LS&EP, encourage greater proportion of high technology and knowledge-based businesses in Loughborough etc). There is support for the potential retention via planning condition of Use Class E(g) to ensure remain as offices, R&D or light industrial in perpetuity.</p> <p>There is no specific policy included regarding strategic warehousing and logistics, instead reference to use of L&L joint evidence approach through Duty to Cooperate to ensure continued long term strategic and collaborative planning of strategic warehousing</p>

	<p>and logistics. Potential ‘areas of opportunity’ reconfirmed in recent study (May 2021) do not include Charnwood, so comfortable with this approach.</p> <p>There could be an addition that development that supports the move to a low carbon circular economy will be supported.</p> <p>Whilst reference in the policy to supporting development that supports and promotes transport, power and broadband infrastructure is welcomed, this Policy is inconsistent with the Place Based policies that reference (in the main) Policies INF1, INF2 and CC5. Notwithstanding this, the Policy does little really to support the need for a coordinated, structured, strategy-led approach to addressing the cumulative transport impacts of growth across the Borough, including interactions between growth in the Service Centres and Loughborough and Leicester.</p> <p><u>Comments from Strategic Property Services in respect of the County Council’s interests as a Landowner</u></p> <p>The policy is generally supported however bullet point 7 could be re-worded to read “.....Priority Neighbourhoods, existing urban areas and service centres”.</p>
Policy E2: Protecting Existing Employment Sites	<p>This policy may be at odds with future development that allows land to become ‘rewilded’ in exchange for government subsidy and other recreational uses - this may not necessarily be ‘farmed’ landscape. The policy should consider allowance for this type of land-use change.</p> <p>The Tourism & Leisure section is very welcome. There is a need to ensure the tourism offer is sustainable and has the infrastructure to support it (skills, transport, accommodation etc). Welcome that support will be offered to the growth ambitions of key tourism businesses in the area. More could be made of the local food and drink offer – there are a number of craft breweries, top restaurants, pubs full of local character that offer quality dining in attractive locations, plus the Edible Forest offer. The Charnwood Forest Partnership is developing a narrative for sustainable tourism and will aim to promote and support SMEs.</p> <p><u>Comments from Strategic Property Services in respect of the County Council’s interests as a Landowner</u></p> <p>Whilst the proposed policy is sound the criteria for those poorly performing uneconomic premises to be widened to include those where poor energy efficiencies will limit their future economic life.</p>
Policy E3: Rural Economic Development	<p>There is a useful section on Tourism but there is nothing mentioned about both increasing and diversifying the amount of accommodation on offer in the area. The section on Town centre buildings could also be improved to mention the Art Deco architecture.</p>

	<p>It is suggested that there is further reference made to make it clear that <i>“development that supports the move to a low carbon circular economy will be supported”</i>.</p> <p>P.149 - Wording should be amended to <i>“provides superfast broadband full fibre gigabit capable broadband networks for all homes and businesses”</i></p> <p><u>Comments from Strategic Property Services in respect of the County Council’s interests as a Landowner</u></p> <p>The policy should also facilitate the re-use or replacement of existing farm buildings on holdings where a viable farm business can no longer be sustained (with or without a diversified enterprise) in order that the premises can continue to make a positive contribution to the wider rural economy.</p>
<p>Town Centres, Services and Facilities</p>	
<p>Policy T1: Town Centres and Retail</p>	<p>Tourism needs to be incorporated into the town centre role for Loughborough, and the importance of town centres as hubs of activity for communities covering informal get togethers to formalised leisure activities, and uses to support working from home (meeting spaces, tech hubs for trouble shooting etc). Latter points Important for Shepshed town centre and for district and local centres too.</p> <p>There is nothing to suggest that Loughborough Town centre should shrink with a focus on the retail core and as units become vacant on the periphery encourage their conversion into residential - this is different to what is suggested on P.153.</p> <p>The Policy could reference the interaction of hot food takeaways and health and the proximity to schools and school routes. There is easier access to this food for communities experiencing health inequality rather than healthy food providers/grow your own opportunities.</p> <p><u>Comments from Strategic Property Services in respect of the County Council’s interests as a Landowner</u></p> <p>Whilst recognising the need to sustain vibrant Town, District and Local centres in the major settlements across the Borough the policy in respect of the Retail provision needs to take account of the impact of on-line shopping and the need to reduce car travel. Accordingly, in order to widen the choice available to communities, particularly in the food retail sector, units of up to 2000 sq m should be permitted in locations within or immediately adjoining the limits of development and within easy reach of local residents, community facilities and the existing centre.</p>

Policy T2: Protection of Community Facilities	<p>'Reasonable effort' should include liaison with Neighbourhood Plan groups where they exist.</p> <p>Policy T1 does not mention community buildings and so it is suggested that there is a requirement to support new development. SUEs should incorporate community meeting places/buildings where community activities can take place and services can be delivered from.</p>
	<p><i>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</i></p> <p>Given that many communities will continue to grow increasing demand for many community facilities such as doctor's surgeries, the policy should be widened to positively support the provision of new, improved or replacement facilities in locations within easy reach of local residents.</p>
Policy T3: Car Parking Standards	It is welcomed that development is expected to meet the 'latest published' LCC parking standards, however there should be a reference added in to provide a cross-reference to the Leicestershire Highway Design Guide.
Climate Change	It is suggested that references should be included to the Government's Transport Decarbonisation Plan.
Policy CC1: Flood Risk Management	<p>Existing proposed policy wording states that <i>"requiring development on brownfield sites to secure a decrease in surface water run-off"</i>. It is recommended that this is changed to align with national policy and supporting guidance/standards. Suggested wording is <i>"requiring development on brownfield sites to discharge surface water run off at equivalent greenfield runoff rates. Where this is adequately demonstrated to not be reasonably practicable, the proposed discharge from the development should never exceed the existing rate for any given event"</i>.</p> <p>Whilst the NPPF does not specifically advise this in relation to brownfield sites, it is implied. It is more clearly defined within Non-statutory technical standards for sustainable drainage systems (https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/415773/sustainable-drainage-technical-standards.pdf) and other supporting guidance.</p>
	<p><i>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</i></p> <p>In applying the sequential test it is important that, in circumstances where the function of the development proposed is to support the sustainability of a particular settlement or service centre that the test be based on the potential to deliver an</p>

	alternate site of a lower flood risk within the same settlement, as housing located some distance away within the wider borough would fail to fulfil that function.
Policy CC2: Sustainable Drainage Systems (SuDS)	<p>Policy CC1 states that SuDS in minor development will be encouraged as per CC2, however minor development is not specifically mentioned in CC2. Furthermore, CC2 advises more on SuDS being a requirement of major development which suggests minor development should not always consider SuDS by default. This section should be reworded.</p> <p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>The policy is considered sound.</p>
Policy CC3: Renewable and Low Carbon Energy Installations	<p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>The generation of renewable energy is strongly supported. It is suggested that the policy is made more positive by assuming that there would be a presumption in favour of development subject to there being no severe impacts that significantly outweigh the benefits of development. It is noted that a significant proportion of the Council's holding at Poole Farm, Quorn currently proposed as a solar farm is situated in a location considered appropriate for that use.</p>
Policy CC4: Sustainable Construction	<p>In designing carbon saving homes, consideration should be made for ensuring that 'Space for Nature' is created such as allowing species of nesting bird or roosting bat to make use of building as part of net gain opportunities. Planning policy has an opportunity through design policy and guidance to provide good advice on this matter. Royal Institute of British Architects already promote literature around this.</p> <p>Biosecurity needs consideration given that warmer temperatures are causing an increase in the threat of pests and diseases.</p>
Policy CC5: Sustainable Transport	<p>Sustainable Transport (Policy CC5) is as anticipated, with the inclusion of negative impacts on air quality and Policy EV11.</p> <p>There is mention that the district will work with the bus operators and the county council to ensure that bus services and sustainable travel options are viable but there is no reference to any contributions required through planning applications to make this happen.</p> <p>The general sentiments of this Policy are welcomed and supported by the CHA, but it is unclear why it refers to just 'major development'. Additionally, the policy appears to be written from the perspective of a single development considered in isolation</p>

	<p>and what is needed to enable it. Whilst this is important, it is not apparent how this policy as currently drafted/worded would be applicable to address a cumulative transport impacts arising from growth across the Borough. The scale of cycling, walking and passenger transport investment required to affect a genuine change in travel behaviours of existing and future residents of the Borough is likely to be significant; securing appropriate developer contributions to deal with cumulative transport impacts will be important to delivering the scale of infrastructure required, and yet this policy does not appear to provide for this.</p> <p>Additionally, it is not just capially funded infrastructure that needs to be considered. Evidence shows that revenue funded educational and behavioural change programmes are essential in achieving changes in peoples’ travel habits and the CHA would want to see the Local Plan provide a robust policy position for seeking developer contributions too towards such revenue funded measures.</p> <p>More widely, it is not especially clear how this policy integrates with other policies to provide a cohesive approach to delivering the package of transportation measures required to support and enable further growth across the Borough.</p> <p>It is suggested that it would be appropriate in this section to mention the governments new National Bus Strategy ‘Bus Back Better’ setting out its plans for ambitious and far reaching reform of bus services across England (outside of London) in the aftermath of the Covid-19 pandemic.</p> <p><i>P.166 - Suggested additions highlighted – “We will expect major developments in the Borough to make provision for improving and extending our walking and cycle networks and ensuring priority is given first to pedestrians and cycle movements. We will also explore opportunities for improved signage, safe well-lit routes, <u>resting equipment and</u> increased connectivity between urban and rural areas <u>and key services</u>. We will promote the health benefits of walking and cycling for healthier lifestyles and improved well-being. More people walking and cycling will also mean less congestion and emissions on our roads, improving air quality for our local communities.”</i></p> <p><u>Comments from Strategic Property Services in respect of the County Council’s interests as a Landowner</u></p> <p>The policy is supported.</p>
Policy CC6: Electric Vehicle Charging Points	<p>There is support for EV charging infrastructure to be fitted in new development but it is perhaps surprising that there is no reference to the provision of vehicle charges in existing off-street car parks.</p> <p>Additionally, given the Government’s ‘target’ to ban the sale of ICE cars from 2030 it is suggested that the policy could be more</p>

	<p>ambitious, i.e. have a starting point of a minimum of ‘passive provision’ for every new parking space (unless site specific circumstances dictate otherwise), applicable to all forms of development.</p>
	<p><u>Comments from Strategic Property Services in respect of the County Council’s interests as a Landowner</u></p> <p>The policy is supported.</p>
Environment	
Policy EV1: Landscape	<p>This policy focuses on the look of the landscape and not really the intrinsic natural capital biodiversity value that it provides. There needs to be consideration of how this policy will work with EV6 and with the need for Biodiversity Net Gain.</p> <p>P.170 - Suggested policy addition – <i>“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.”</i></p>
	<p><u>Comments from Strategic Property Services in respect of the County Council’s interests as a Landowner</u></p> <p>Policy appears both sound and proportionate. It is important that in the plan making process that these strategic policies are given sufficient weight as to prevent green wedges and local areas of separation being compromised by allocating built development in situations where alternative deliverable sites exist.</p>
Policy EV2: Green Wedges	<p>Green wedges are a local policy tool in Leicester and Leicestershire and their longevity into the future is sought given the green corridor they provide into the City. It is recognised that change may need to be identified to Green Wedges in light of the need to maximise the use of land for growth within the City whilst minimising environmental harm, and given the extension of Green Wedges into urban areas in surrounding districts change may be required. Support is given to the use of the shared methodology for reviewing Green Wedges, and it is understood this has been the case and that this has informed the identification of allocations of land within areas of Green Wedge in Charnwood Borough.</p> <p>Green wedges should also look to promote wider landscape connectivity & continuity to avoid further fragmentation, by providing linear and spatial habitat. For example, buffer zones and grading of glades, as the edges are some of the most valuable habitat for species (e.g. Woodland Fringe, urban to rural transitional habitat).</p>
	<p><u>Comments from Strategic Property Services in respect of the County Council’s interests as a Landowner</u></p> <p>Policy appears both sound and proportionate. It is important that in the plan making process that these strategic policies are given</p>

	sufficient weight as to prevent green wedges and local areas of separation being compromised by allocating built development in situations where alternative deliverable sites exist.
Policy EV3: Areas of Local Separation	<p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>The Policy appears both sound and proportionate. It is important that in the plan making process that these strategic policies are given sufficient weight as to prevent green wedges and local areas of separation being compromised by allocating built development in situations where alternative deliverable sites exist.</p>
Policy EV4: Charnwood Forest and the National Forest	<p>The section on the National Forest and Charnwood Forest is well aligned to local strategies for sustainable tourism development in these areas.</p> <p>There could be reference to the role of eco-tourism for visitor experiences and managing the conflicts of tourism and recreation against biodiversity.</p> <p>Access for all, looking at access audits, accessibility training at tourist sites and improved visitor facilities (e.g. changing places). Enhanced visits and increased marketing as an accessible tourism destination, helping the local economy and general experience. £12.1 billion is spent in the accessible tourism industry (*this point may be better placed elsewhere in the plan; however, forest experiences are one example of accessible tourism if planned well and branded).</p> <p>There are opportunities for cultural links to the BEM communities along the corridor, many who do not have vehicle access. There are large residential areas around the centre and Loughborough and there is limited access on to towpaths and lack of signage in many areas.</p> <p>There should be cultural considerations and sensitivities in preserving and managing the waterway. For example, cremation points for Indian cultures etc.</p> <p>Way finding in creative new ways should be considered, for example street art collaboration and celebrating local arts. There could be potential guides that link up key hubs and facilities along major routes, for example, cafes, heritage assets, cycling hubs, toilets etc, supporting local businesses etc. Working with the local tourist board.</p> <p>There should be consideration in the biodiversity plans for invasive and non-native species in terms of safeguarding the ecology of the waterway. There are currently issues with floating penny wort, American signal crayfish and Himalayan balsam amongst other, which are a risk. There is the potential to improve connectivity via eel passes, groins etc. for salmon.</p>

	<p>There is a potential for Green Flag status along improved routes and key sites such as Country Parks and the River Soar. There is already good marketing & associated management as they are high value tourist destinations. There are opportunities around travel by water too, for example via boat (water taxi's) and recreational activities such as paddle boarding, kayaking, and canoeing. With links to the Soar Trail. Opportunities are present to improve visitor moorings in partnership with others.</p> <p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>These policies appear both sound and proportionate.</p>
<p>Policy EV5: River Soar and Grand Union Canal Corridor</p>	<p>The section on the Charnwood Forest, Grand Union Canal and River Soar have identified positive opportunities for sustainable growth in the visitor economy.</p> <p>Improving access along the River Soar for water-based recreation could also be integrated into design of new employment and housing sites as well as ensuring the removal of barriers to access along the Soar & GU itself.</p> <p>There are opportunities for cultural links to the BEM communities along the corridor, many who do not have vehicle access. There are large residential areas around the centre and Loughborough and there is limited access on to towpaths and lack of signage in many areas.</p> <p>There should be cultural considerations and sensitivities in preserving and managing the waterway. For example, cremation points for Indian cultures etc.</p> <p>Way finding in creative new ways should be considered, for example street art collaboration and celebrating local arts. There could be potential guides that link up key hubs and facilities along major routes, for example, cafes, heritage assets, cycling hubs, toilets etc, supporting local businesses etc. Working with the local tourist board.</p> <p>There should be consideration in the biodiversity plans for invasive and non-native species in terms of safeguarding the ecology of the waterway. There are currently issues with floating penny wort, American signal crayfish and Himalayan balsam amongst other, which are a risk. There is the potential to improve connectivity via eel passes, groins etc. for salmon.</p> <p>There is a potential for Green Flag status along improved routes and key sites such as Country Parks and the River Soar. There is already good marketing & associated management as they are high value tourist destinations. There are opportunities around</p>

	<p>travel by water too, for example via boat (water taxi's) and recreational activities such as paddle boarding, kayaking, and canoeing. With links to the Soar Trail. Opportunities are present to improve visitor moorings in partnership with others.</p>
	<p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>These policies appear both sound and proportionate.</p>
<p>Policy EV6: Conserving and Enhancing Biodiversity and Geodiversity</p>	<p>P.178 – It is stated that Charnwood will work with partners to prioritise areas for investment in protected species and priority habitats. LCC would wish to include appropriate Green Infrastructure along highways, country parks and other land such as County Farms as part of the discussion concerning improvements in Borough.</p> <p>Reference to the principles in the Lawton review 'Making Space for Nature' in terms of bigger, better, and more connected landscapes to be considered in enhancing fragmented habitats. Reference to the local and national UKBAP. LWS should be given consideration in these development areas as high value spaces for nature.</p> <p>P.179 – There should be reference to Native species of local providence in wildflower creation schemes.</p> <p>Hedgerow restoration should be included in the plating of trees and shrubs to restore and expand fragmented habitats, providing wider connectivity and cover. Carbon credits could also be referenced, in terms of biodiversity net gain and off-setting.</p> <p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>Policy appears both sound and proportionate.</p>
<p>Policy EV7: Tree Planting</p>	<p>This content is generally supported.</p> <p>Interventions to deliver planting to tackle loss of trees due to Ash Dieback is supported, however biosecurity needs consideration in site management practises and in the field to control spread and disease.</p> <p>Regarding project and ecological assurance of new planting schemes, whilst biodiversity surveys are mentioned, perhaps greater elaboration on ensuring high value habitat is not displaced by new planting, for example grassland habitat nationally and locally in decline.</p> <p>It is suggested that installation of bat and bird boxes should be installed where appropriate on younger trees or other suitable</p>

	<p>locations (buildings) to add greater habitat opportunity in new creation schemes.</p> <p>Local providence and local supply for trees should be utilised and/or with appropriate passports if not possible to minimise risk to biosecurity. Any newly planted trees that are likely to interact with the public highway should be covered by effective management and funding arrangements for the lifetime of the development, through commuted sums and appropriate monitoring.</p>
	<p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>Policy appears both sound and proportionate.</p>
Policy EV8: Heritage	<p>Although LCC do not provide heritage advice to CBC, LCC do maintain the Historic Environment Record (HER) for the Borough, the latter is referenced in the supporting text to their Heritage policy (EV8). The HER represents the primary record to inform the management of heritage, particularly non-designated heritage assets (the vast majority of known and potential heritage assets likely to be encountered) through the development management process. This point could usefully be reinforced through explicit reference in the supporting text.</p> <p>As a general comment, reviewing proposed heritage policy (EV8), Identifying the role that heritage plays in creating and a sense of place and attracting economic growth and tourism is to be commended and appears to be in according with national planning policy, but perhaps fails to take into account the recent changes to the NPPF with regard to contested heritage. Specifically, proposals as they relate to statuary, memorials, plaques and commemorative monuments; proposals to demolish or alter non-listed heritage assets within this class of monument now require consideration for planning permission. In the latter context LCC HNET also maintain the War Memorial project database which lists and curates an online and publicly accessible record of the commemorative monuments within the county, including Charnwood.</p> <p><i>P.184 – “Incorporate Charnwood’s distinctive local building materials and architectural details to make a positive contribution to the character and appearance of the area” – the use of non-standard materials needs careful monitoring.</i></p>
	<p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>Policy appears both sound and proportionate.</p>
Policy EV9: Open Spaces, Sport and	<p>The development of additional Allotment Gardens within larger developments are encouraged and supported, to secure the associated community, health and wellbeing benefits.</p>

Recreation	<p>A HIA would help look at community garden need targeted at those who may be experiencing inequality around access to green space to grow produce. These considerations need to be made to reduce health inequality within the borough.</p> <p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>Policy appears both sound and proportionate.</p>
Policy EV10: Indoor Sports Facilities	<p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>Policy appears both sound and proportionate.</p>
Policy EV11: Air Quality	<p>The Policy implies acceptance of a certain level of pollution from development but 'significant impact' needs defining.</p> <p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>Policy appears both sound and proportionate.</p>
Policy EV12: Burial Space	<p>Burial spaces provide huge opportunity to increase habitat and promote wider landscape connectivity. Early consideration of commitment to achieving biodiversity net gain within the design process is vital.</p> <p><u>Comments from Strategic Property Services in respect of the County Council's interests as a Landowner</u></p> <p>Policy appears both sound and proportionate.</p>
Infrastructure and Delivery	
<i>General comment</i>	<p>The CHA welcomes the transport evidence work undertaken to date by CBC. The evidence has served to highlight the challenges presented – both on the local transport system and the Strategic Road Network – in seeking to accommodate yet further growth in the Borough, not least cumulative impacts.</p> <p>It is the CHA's view that a coordinated, strategy-led approach is required to address the challenges – not least in respect of securing funding to deliver the package of transport measures required to support/enable growth. However, the wording of the introductory text ("<i>...This strategy has been based on an assessment of the infrastructure needs of individual site allocations [CHA</i></p>

	<p><i>highlighting] to ensure that development is sustainable....”) does nothing really to support the need for a coordinated approach.</i></p> <p>The CHA notes that “...new development cannot be used to fund an existing shortfall in infrastructure; it can only be required to address the needs arising from new development itself...”. However, the transport evidence work undertaken to support the Local Plan’s development suggests that existing problems both on the local transport system and Strategic Road Network are likely to be a barrier to the ‘acceptable’ delivery of further growth in the Borough, unless a route(s) (i.e. alternate to developer funding) can be agreed towards identifying other ways to plausibly and reasonably address the problems within the Plan period.</p> <p>In this respect and learning from its experience with the Melton Local Plan (and the considerable scale package of transport measures required to enable growth in Melton Mowbray) the CHA consider it is important the Local Plan should embed a coordinated, strategy-led approach, both through a core narrative about the journey up to and beyond the Local Plan’s adoption and in respect of robust policies linking growth to strategy development and delivery.</p> <p>The Infrastructure Schedule is derived from transport evidence work undertaken to inform the Local Plan’s development and does contain measures which provide a platform for moving forward. But, at as it stands at present the measures are not drawn together in any coordinated, strategy-led way. It also noted that they have a cost running to several hundreds of millions of pounds, including Strategic Transport Projects.</p> <p>In its overall comments on the draft Plan, the CHA references ongoing discussion with CBC to agree the details of a continuing work programme. The CHA expects that such a work programme is predicated on developing a more strategy-led and coordinated approach to the further development and delivery of the package of highways and transportation measures that are required to facilitate the Plan’s successful delivery. The CHA also anticipates that the outcomes of the work programme available by the time of the Plan’s Examination in Public are likely to necessitate discussions about possible changes to the Plan’s narrative text and policies to reflect the evolved and evolving situation and to ensure that the Plan provides as strong a policy platform as possible for seeking to secure the required highways and transport investment.</p>
<p>Policy INF1: Infrastructure and Developer Contributions</p>	<p>It is the CHA’s view that as currently drafted, this policy is rather too generic and, in line with comments elsewhere, does little really to embed in the Plan the coordinated, strategy-led approach that is required to supporting/ enabling further growth in the Borough.</p> <p>There is a large introduction relating to infrastructure but from a county context, only education is referred to. The delivery of new or enhanced library provision or the securing of S106 agreements to mitigate the impact of a development on libraries is not mentioned. Waste is also not mentioned at all. The policy needs expanding to do so. It states that significant expansion to local</p>

schools and the provision of new schools will be required and this will be achieved through individual contributions. There is concerns for the County that not all developments may deliver the necessary level of contributions especially if the applicants go down the viability route. Viability is mentioned – It states that the plan itself is tested to see if its viable and that developers should provide full details to allow the Council to assess viability if this relates to individual planning applications. It is important to protect the position of the County that the plan is properly viability tested at a strategic level to ensure that all of the infrastructure that is required as part of the development can be delivered otherwise its delivery will fall to the County Council.

There is also no mention of contributions to infrastructure that promotes healthy lifestyles, so primary prevention and wider determinants of health, only health services. A link could be made to Policies EV9 and EV10 to overtly link activity to health, and a HIA could help with placing these facilities around accessibility for those experiencing most inequality.

Revised text is suggested for the broadband section on Page 194:

Full-fibre broadband is a critically important infrastructure now commonly referred to as the ‘fourth utility’ alongside electricity, gas and water supply. We want Charnwood to be a well-connected borough in order to reduce the need to travel, support higher levels of home working and inward investment and improve economic competitiveness. Leicestershire County Council is committed to working towards universal coverage of gigabit capable broadband infrastructure for all homes and businesses in Leicestershire, with the ‘Superfast Leicestershire’ focussed on areas not served by commercial operators. The Council supports a principle policy objective of promoting high quality digital infrastructure to all new build developments.

The greatest need is likely to remain in rural areas in the east of the Borough where in the region of 1,000 premises remain unconnected. We will continue to support the full roll out of superfast broadband and full-fibre gigabit capable broadband to achieve the Government’s target of a full fibre UK wide network and ensure that all of our businesses and communities are able to take advantage of the opportunities that it presents.

The Council supports the expansion of electronic communications networks, including next generation mobile technology (such as 5G) and full fibre broadband connections. Any proposed development will be required to work with all engaged network operators to further this aspiration within the Charnwood area and to seek to leverage improved gigabit capable network deployment to surrounding areas.

The Council aspires to encourage innovation within the telecommunications asset space. This includes but is not limited to the deployment of multi-use infrastructure components. Examples may include electric vehicle charging points or community WIFI hotspots.

	<p>The Council supports a 'dig once' approach for the deployment of communications infrastructure and a build which is sympathetic to the character and appearance of the surrounding area. The Council encourages telecommunications build which does not significantly impact on the appearance of any building or space on which equipment is located and which minimises street clutter.</p> <p>The Council supports the co-location, re-use and sharing of infrastructure assets including duct space and mast sharing with fixed and mobile networks designed to a minimal necessary size and scale within the visible build environment.</p>
Policy INF2: Local and Strategic Road Network	<p>It is the CHA's view that as currently drafted, this policy is rather too generic and, in line with comments elsewhere, does little to embed in the Plan the coordinated, strategy-led approach that is required to supporting/enabling further growth in the Borough.</p> <p>There is mention that development must support sustainable forms of travel however, including public transport. This loosely fits in with the County requirements.</p>

Appendix / Glossary

Section	Comments
Appendix 1: Monitoring	No comment.
Appendix 2: Housing and Employment Trajectory	The trajectory may be considered overly favourable in the early years for the three SUE's.
Appendix 3: Infrastructure Schedule	Detailed costs associated with delivering different types of named infrastructure is given here. County infrastructure (Libraries, Civic Amenities, Sustainable Transport measures & Education) to be delivered by S106 which provides risk that the necessary funding might not come forwards. Some of the highway works are to be delivered by S106 with others to be provided direct by the developer. Again, CBC will need to make sure that the developer signs up to these contributions to ensure that these schemes happen to facilitate the growth. It is also important that the plan is correctly assessed for its strategic viability to ensure that the cost associated with the delivery of development and the necessary infrastructure that is associated with it is future proofed so that it is still relevant to allow the infrastructure to be delivered as envisaged.

	<p>See also CHA comment on Infrastructure and Delivery Section. Additionally, and reflecting the CHA’s general comments on the overall document, the lists within the table (from ‘Leicester Urban Area’ onwards), will need to be reviewed and updated to reflect the evolving situation as a result of the continuing work programme, most likely to see the transport components simplified/more broadly worded so as to relate to the development of cumulative, area-based transport strategies and mitigation packages, rather than necessarily listing the specific measures tested through the Local Plan modelling work. Additionally, it is noted that some of the areas (most notably the Leicester Urban Area) do not currently include a transport line, which creates a misleading impression that any cumulative transport mitigation is not required to accommodate growth in such areas.</p> <p>P.216 - It is suggested that wording under infrastructure scheme be changed to “<i>Site reconfiguration and development of waste infrastructure to increase the capacity at Mountsorrel Civic Amenity site</i>”.</p> <p>P.218 – It is suggested that wording under infrastructure scheme be changed to “<i>Site reconfiguration and development of waste infrastructure to increase the capacity at Shepshed Civic Amenity site</i>”.</p>
Appendix 4: Design Guidance	<p>The approach to design guidance is supported, particularly in light of increased emphasis on good design in Planning White Paper and recent linked consultation on national design code.</p> <p>In respect of the bullet points providing guidance for new walking and cycling routes, an additional bullet point should be added stating that ‘<i>new facilities should be developed in accordance with the Government’s current cycle design guidance LTN 1/20</i>’, to ensure the greatest possible clarity about our future expectations of developer-led infrastructure.</p> <p>P.237 - Wording regarding ‘waste and bin storage’ is considered currently weak in terms of actual space requirements as further to the Government’s current proposals for future consistency in waste collections (further to their Resource and Waste Strategy 2018) more space will be required to accommodate a greater number of bins including a food waste bin. Similarly, storage at the rear of a property would not be sufficient if there is no room to bring bins to the front of the property. Wording should be phrased to take account of accessibility requirements.</p>
Glossary	No comment.

Other / non-policy specific comments / general presentational comments

Comments

In the draft Local Plan good progress has been made to find suitable sites for new primary schools in the communities of West Loughborough (Garendon Park), Shepshed, Barrow upon Soar , Anstey, Syston, North East of Leicester SUE (Thorpebury) and North of Birstall SUE (Broadnook), as well as for a significant expansion for Cossington Primary School.

However, it should be noted that further conversations are required with CBC and developers regarding the potential requirement of additional land for Woodbrook Vale Academy to support housing development to the the south of Loughborough, and also for the delivery of new SEND provisions across the Borough. Wherever possible new SEND provisions will be attached to existing or new, primary or secondary schools in each locality accepting there will be circumstances where some pupils with specialist needs may need to attend schools further afield.

From an Early Years perspective, it is expected that new provision will be developed in each locality either attached to schools and/or placed separately in community hubs.

The County Council has a statutory duty to provide every child with a school place, ideally within the locality where they reside. It is encouraging that the draft Local Plan appears to recognise that good and sustainable schools function best when placed at the heart of the communities they serve. This connection is particularly important, as the benefits of ensuring pupils are educated in their local communities are multifaceted; to pupils in terms of their education and social development (including the transition to healthy and participatory adulthood) and to the local economy which is derived from future employees who attended local schools with continuity and progression, related to skills required by nearby employers and local family support networks.

LCC is confident that CBC are covering biodiversity issues appropriately; supported by CBC's own in-house ecologist.

It is repeatedly stated in the document that SuDS should be implemented where appropriate. This makes it sound more optional than it is. It is suggested that stronger statements should be used, such as 'SuDS must be incorporated, unless there is clear evidence that this would be inappropriate;". This is also more in-line with NPPF wording (NPPF Para 163).

The LLFA would request the LPA consider making pervious paving SuDS a requirement for all private driveways and shared parking areas on residential developments. This will provide source control treatment and reduce the total volume of run-off from a development site. These should only be used for attenuation where they are located within shared areas accessible by an appointed maintenance company.

It would be useful to have a list of references at the end of the document which refer to the external evidence supporting the document.

Public transport is used numerously throughout the document. It would be better to use the terminology 'Passenger Transport' instead where it occurs.

For ease of reading it would be better if diagrams and maps had figure numbers, so it is easy to refer to them in the text. This would be the same for tables.

Profile, Pg. 8	<ul style="list-style-type: none"> • A map of the location of Charnwood would be a good visual aid for people reading the document to break up the text and give a different method of showing the key settlements/ strategic transport network around it. • It may also be more visually pleasing to split the profile information into a table.
Section 1.26	<ul style="list-style-type: none"> • Missing a full stop at the end.
Pg. 19	<ul style="list-style-type: none"> • Paragraph 2.7 is missing a comma between employment and shops which we recommend amending.
Pg. 119	<ul style="list-style-type: none"> • Section 3.182 is missing a full stop at the end of the sentence.
Pg. 129	<ul style="list-style-type: none"> • Section 3.212 states “the following map...” however this is related to a map previous to this text, so perhaps this should say the “ the map above.” Or refer to a figure number.
Pg. 138	<ul style="list-style-type: none"> • Section 4.28 is missing a full stop at the end.
Pg. 164	<ul style="list-style-type: none"> • Section 7.2- ‘process’ should be ‘processes’ in the paragraph.
<p><u>Comments from Strategic Property Services in respect of the County Council’s interests as a Landowner</u></p> <p>In addition to the comments already made, more detailed site-specific consultation responses will be submitted in respect of the County Council’s Sites at Farley Way and Barrow Road, Quorn.</p>	

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