

From: Callum Harrison <callum.harrison@tarmac.com>
Sent: 04 September 2024 10:35
To: localplans@charnwood.gov.uk
Subject: CHARNWOOD LOCAL PLAN MAIN MODIFICATION CONSULTATION (SEPTEMBER 2024)
Attachments: Sileby Road Main Modification Representations.pdf

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Good Morning,

Please see attached representations for the Main Modifications Consultation.

Kind regards,

Callum

Callum Harrison
Development Planner

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www.tarmac.com



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Date: 4th September 2024

Local Plans
Charnwood Borough Council
Southfield Road
Loughborough
LE11 2TX

Sent by email only:- localplans@charnwood.gov.uk

Dear Sir/Madam,

CHARNWOOD LOCAL PLAN MAIN MODIFICATION CONSULTATION (SEPTEMBER 2024) - REPRESENTATIONS ON BEHALF OF TARMAC TRADING LIMITED

We are writing on behalf of Tarmac Trading Limited (Tarmac) in response to publication of the Main Modifications to the Charnwood Local Plan 2021-2037.

These representations relate to Tarmac land interests within the District, namely at Sileby Road and Lilac's Farm.

Sileby Road

Part of the landownership to which this representation relates, falls within proposed allocation ES1. The wider site consists of grassland which is a mixture of Non-Agricultural and Grade 3b and Grade 4 agricultural land.

The site is located close to the Hayhill Industrial Estate. To the west side of the site is a Conveyer which passes under Barrow Road and into Tarmac's Barrow Railhead. Access to the Northern section of the site can be gained from One safe formal access routes off Sileby Road. Other access routes also existing but are not up to standard.

Policy DS4 'Employment Allocations' Promotion of Land for Employment Uses at Sileby Road, Barrow upon Soar

We support the inclusion of the Land off Sileby Road (reference ES1), which is in Tarmac freehold ownership, as an employment allocation. We can confirm that the land is available and consider it to be viable and deliverable to support employment uses in the emerging Local Plan plan-period.

A Plan showing the extent of Tarmac's freehold landholding at Sileby Road that is available for development is appended to this letter at Appendix A.

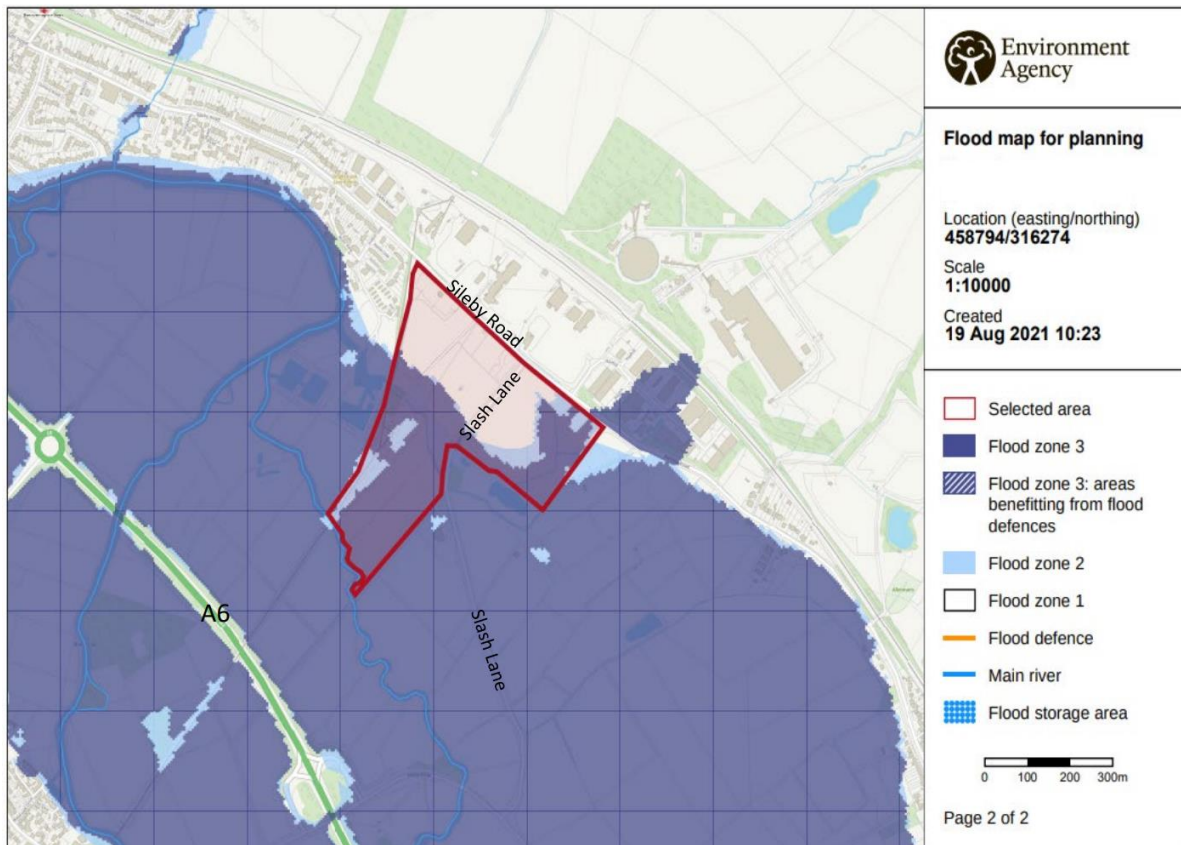
The land already benefits from allocation for employment uses in the Barrow upon Soar Neighbourhood Plan 'made' in 2018. In addition to confirming our support for the site's inclusion as an employment allocation, we also wish to confirm that additional land in the vicinity of site ref. ES1 is considered to merit employment allocation.

Tarmac's freehold landholding at Sileby Road extends significantly beyond the boundaries of site ref. ES1. The land interest as shown at Appendix A measures 18.5 hectares (including the 2.3 hectare allocation ES1). It is considered that much of the landholding beyond ES1 is capable of delivering employment uses over the Plan period. Similarly, Tarmac's land at Sileby Road has significant potential to provide biodiversity net gains which can be delivered in association with new built development within the boundaries of ES1 and beyond.

Site ref. ES1 lies adjacent to the mineral conveyer which is used to transfer mineral from Mountsorrel Quarry to the rail sidings north of Sileby Road. Further east, Tarmac own land similarly suitable for

employment development which is currently identified as Open Countryside on the Main Modifications Local Plan Policies Map. We would like to take this opportunity to confirm once again that this land is available for development and should be considered.

Importantly, much of the land beyond ES1 that remains in Tarmac’s ownership is located within Environment Agency Flood Zone 1 which is sequentially preferable for development given that flood risk is a significant constraint to development locally. Figure 1 below shows site ref. ES1 and the surrounding Tarmac freehold land that we submit is deliverable for a mix of employment uses and associated biodiversity enhancement. The land is shown overlain on Flood Mapping courtesy of the Environment Agency.



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Figure 1 Site ES1 with wider Tarmac freehold land (outlined in red)

Furthermore, spatially, the site location makes it ideal for employment development. It is directly adjacent to an existing industrial estate, as well as large scale mineral operations being undertaken on two sides. Additionally, the flood plain to the south and east ensures that if it were allocated there would be no additional sprawl beyond this. Therefore, no precedent could be set by this allocation, and sprawl leading to merging settlements would also not occur.

Whilst late in the process, given the above and in context of the NPPF Consultation, it would be pertinent for the Council to consider allocating this wider site in order to address the employment need.

Biodiversity Benefits

The land within the red outline above that does not fall within employment allocation ES1 and/or Flood Zone 1 predominantly consist of fields used for livestock grazing. Given that these fields frequently flood, they have the potential to deliver significant bespoke biodiversity net gain which would become

viable and deliverable upon the development of employment uses at ES1 and within the areas at least risk of flooding, indicated on Figure 1 above.

These BNG benefits should carry significant weight and Tarmac would be open to allocating the areas outside of flood zone 3 separately for biodiversity if the Council wished to do so.

Lilacs Farm

A Plan showing the extent of Tarmac's freehold landholding at Lilacs Farm, within the wider Mountsorrel holding is available for development is appended to this letter at Appendix A.

The site is set to the south west of Barrow Road, approximately 500m south east of the aforementioned Sibley Road site. The site consists of grassland and is 13.36ha in size.

Alike the Sibley Road site, the holding is well located between Barrow-Upon-Soar and Sibley surrounding by commercial, industrial, and mineral operations. As such, from a spatial planning perspective, the land is well located for an employment use, whereby there are limited noise sensitive receptors nearby which could be harmed by such a development.

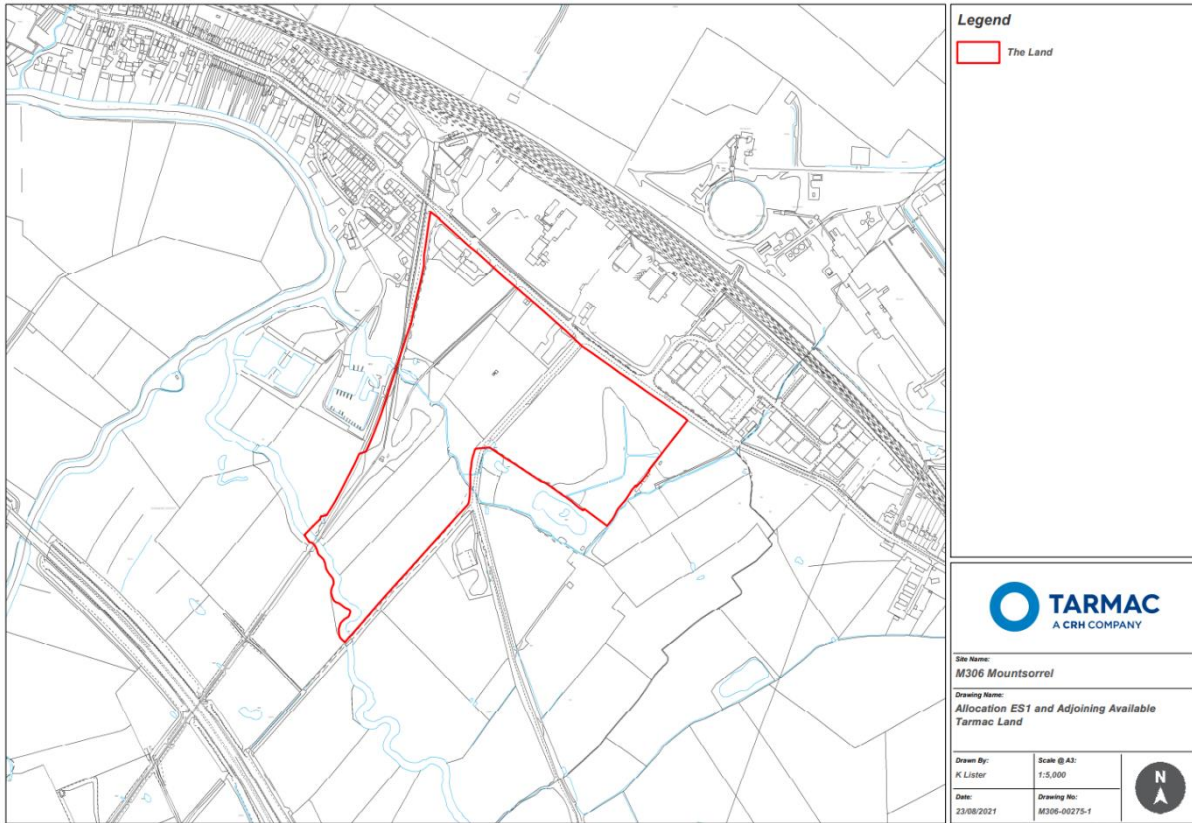
Vehicular access to the farm already exists, and would just require minor improvements with limited clearance. Underground power cables also traverse west to east adjacent to the north eastern boundary of the site. As such, the necessary utilities could also be provided without great difficulty.

Given the size of the site and it being under control entirely by Tarmac, there is also scope for biodiversity net gain enhancements on the site, as part of the redevelopment or as a standalone allocation. Tarmac would wish to discuss this matter with the Council at the earliest opportunity.

Conclusion

We hope that whilst steps are taken to prepare an outline planning application for the land at ES1 following its allocation within the Barrow upon Soar Neighbourhood Plan, the land beyond ES1 should be considered favourably for its development potential and/or its potential to provide biodiversity enhancement in the future. Lilacs farm, as shown in appendix 2 also is also suitable for employment development and should be considered to enhance the Council's employment land provision.

Appendix 1 - Extent of Landholding Available for Development (incorporating Employment Allocation ES1) (Drawing No. M306-00275-1)



Appendix 2 - Extent of Landholding Available for Development at Lilac's Farm, which is part of Tarmac's Mountsorrel holding.

