

**From:** at.ttplanning@gmail.com  
**Sent:** 04 September 2024 14:48  
**To:** localplans@charnwood.gov.uk  
**Cc:** ttpltdoffice@gmail.com  
**Subject:** Charnwood Local Plan 2021-2037 (Proposed Modifications)  
**Attachments:** Scottorn Charnwood LPlan Prop Mods Comment Form Policies Map (&Appends).pdf

to: Local Plans Team (CBC)  
cc:  
ref:

**RE: CHARNWOOD LOCAL PLAN – PROPOSED MODIFICATIONS**

Please find attached representations made on behalf of our client Mr S Scottorn.

I would be grateful if you would acknowledge safe receipt in due course.

Please don't hesitate to contact me should you have any questions.

Regards  
Andy

**Andrew Thomas** BSc(Hons) DipTP MRTPI  
**email:** at.ttplanning@gmail.com  
**mobile:** 07973 667537



**THOMAS TAYLOR PLANNING Ltd**

Castle House : South Street : Ashby de la Zouch : Leicestershire : LE65 1BR  
Registered in England & Wales No. 6183266  
VAT Reg Number 901688814

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**Charnwood**

Charnwood Local  
Plan 2021-2037  
Policies Map  
Consultation Form

For responding to:

- Policies Maps Changes (EXAM 84)

Ref:

(For official use only)

Please return to Charnwood Borough Council by 5PM on 4th September 2024 by:

- Email: [localplans@charnwood.gov.uk](mailto:localplans@charnwood.gov.uk)
- Post: Local Plans, Charnwood Borough Council Southfield Road, Loughborough, LE11 2TX

The Privacy Statement can be found at: [www.charnwood.gov.uk/privacy](http://www.charnwood.gov.uk/privacy)

This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each representation you wish to make.

## Part A

### 1. Personal Details\*

*\*If an agent is appointed, please complete only the Title, Name and Organisation (if applicable) boxes below but complete the full contact details of the agent in 2.*

### 2. Agent's Details (if applicable)

|                                    |          |                         |
|------------------------------------|----------|-------------------------|
| Title                              | Mr       | Mr                      |
| First Name                         | S        | A                       |
| Last Name                          | Scottorn | Thomas                  |
| Job Title<br>(where relevant)      |          |                         |
| Organisation<br>(where relevant)   |          | TTPLtd                  |
| Address Line 1                     |          | Castle House            |
| Line 2                             |          | South Street            |
| Line 3                             |          | Ashby de la Zouch       |
| Line 4                             |          |                         |
| Post Code                          |          | LE65 1BR                |
| Telephone Number                   |          | 07973 667537            |
| E-mail Address<br>(where relevant) |          | at.ttplanning@gmail.com |

## Part B – Please use a separate sheet for each comment

Name or Organisation:

3. Please set out any comments that you have on EXAM 84: Schedule of Proposed Changes to Policies Maps 1 and 2.

We previously made representations to secure an extension to the Limits to Development at Burton on the Wolds to include existing industrial land and buildings at Sowers Lane that were clearly part of the settlement as opposed to open countryside (copy attached and see annotated extract from Proposed Modifications below highlighting the land and buildings in question).

### Pre-Submission Draft version



© Crown copyright

**EXISTING INDUSTRIAL SITE REMAINS EXCLUDED FROM LIMITS TO DEVELOPMENT**

### Updated version (based on proposed changes)



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We note that proposed changes to Policy Maps 1 & 2 under PC1 & PC13 (now propose to extend the Limits to Development to reflect residential planning permissions that have been granted (PC13) but we consider these do not go far enough to reflect the physical characteristics of the settlement and to properly distinguish between the countryside (where particularly restrictive development policies apply) and the built-up framework of the settlement.

Furthermore, the proposed changes do not reflect the recent grant of planning permission for the storage of containers for self-storage, associated on-site parking and erection of site entrance height restrictor under planning permission P/19/0919/2 on part of our clients' land.

The Policies Maps are intended to provide a spatial expression of the policies in the plan and several policies carry either support for, or resistance to, new development depending upon

whether the application site is identified as falling within or outside Limits to Development as shown on the Policies Map. It is therefore critical to the soundness of the Plan and to ensure it is effective to identify up-to-date, factually correct and accurate Limits to Development.

We note that the Council has applied a number of principles to the changes made to the Policies Maps "to ensure consistency in the approach to settlements" and to clarify the approach taken by the Council. This includes a statement that "**Employment Allocations and 'existing employment sites' which are located adjacent to** the built form, have not been included within the Limits to Development, unless they are located within a Housing Allocation, Sustainable Urban Extension or they have been included within the Limits to Development in a made Neighbourhood Plan".

Notwithstanding whether the land and buildings comprise an "Employment Allocation" or an "existing employment site", it is a matter of fact that they represent previously developed land that is occupied by permanent and substantial buildings forming an integral part of the built-up fabric of the settlement both physically and visually.

While there is a Neighbourhood Plan in Burton on the Wolds, it was made in 2021 so is more than 3 years old and was based on a consultation exercise carried out in 2019 (5 years ago). When adopted, the new Charnwood Local Plan and its policies will supersede the Neighbourhood Plan and in the absence of a Neighbourhood Plan review, the Local Plan exercise should ensure that it is sound and its spatial strategy and policies which direct the pattern of development remains effective.

While the principles that the Council has applied to amending the Limits to Development boundaries might provide an administrative convenience nonetheless –

- a) No explanation has been given as to why wholesale exclusion of existing employment sites adjacent to built form – which in our clients' case represents an extensive area of built form - should be excluded from Limits to Development
- b) The principle adopted by the Council's reflects a "one-size-fits-all" approach which doesn't result in the identification of up-to-date, factually correct and accurate Limits to Development at Sowters Lane.
- c) As a result of b) above, the proposed changes to the Proposals Map – in combination with the application of policies which refer to Limits to Development results in an unsound, ineffective Plan – particularly in the case of our clients' industrial site at Sowters Lane.
- d) The other changes to the Limits to Development through PC1 & PC13 result in an illogical situation with an artificial distinction between our clients land and the new Limits to Development drawn to the west of Sowters Lane.

We maintain that the Limits to Development has been incorrectly drawn and should be extended to include our clients' land and buildings to the west of Sowters Lane.

(Continue on a separate sheet /expand box if necessary)

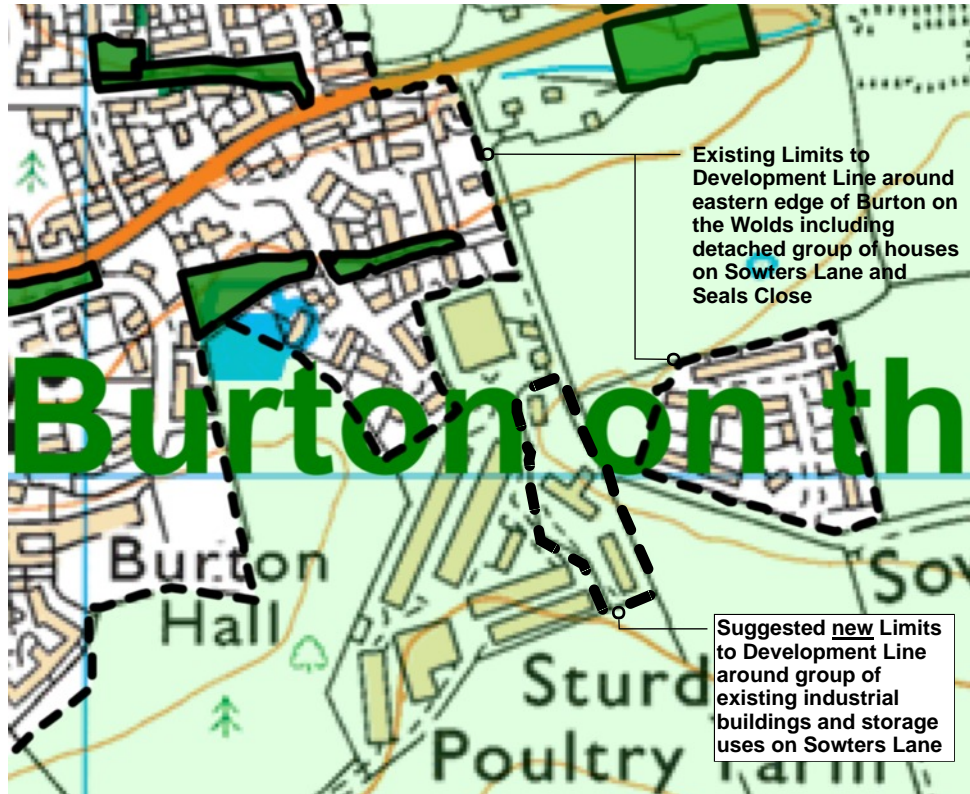
*Please note In your comments you should provide succinctly all the evidence and supporting information necessary to support your comments and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

4. Signature:

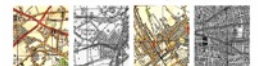
A Thomas (TTPLtd)

Date:

4/9/24



**THOMAS · TAYLOR  
PLANNING LTD**



Castle House : South Street : Ashby de la Zouch  
Leicestershire : LE65 1BR

Tel/Fax - 01530 563800  
email - at.tplanning@yahoo.co.uk

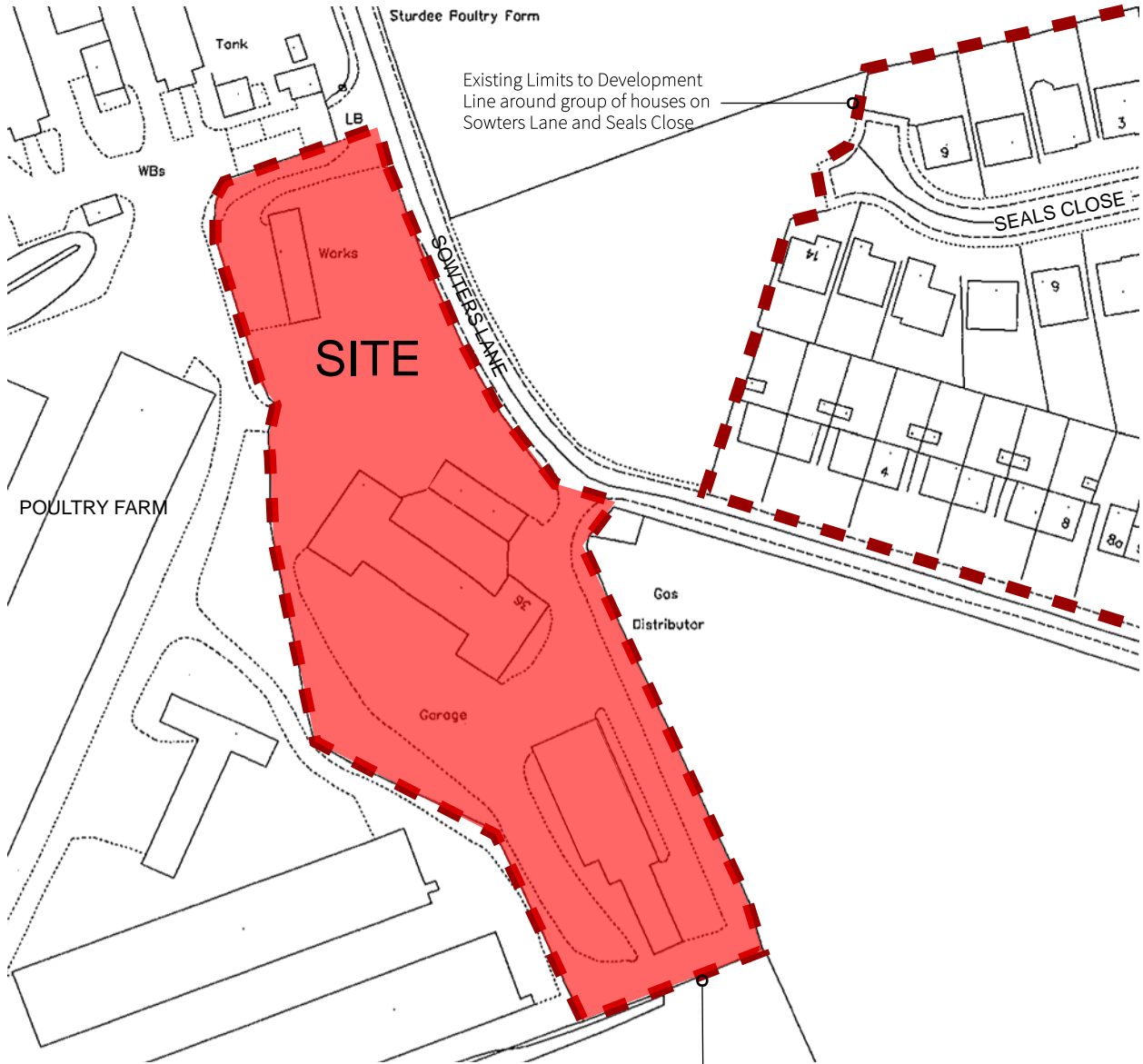
**PROPOSED ALTERATION TO LIMITS TO DEVELOPMENT**

**Project :** CHARNWOOD LOCAL PLAN 2021-37 PRE-SUBMISSION DRAFT PLAN  
**Client :** MR S SCOTTORN  
**Site :** LAND OFF SOWTERS LANE, BURTON ON THE WOLDS, LOUGHBOROUGH  
**Scale :** NTS

**Drawing :** Sheet 1 of 2

**S52.1**

**Notes :**



Boundary subject to detailed survey and agreement with LPA.

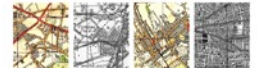
Suggested new Limits to Development Line around group of existing industrial buildings and storage uses on Sowters Lane to include land tinted red.



Scale: 1:1250



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**PROPOSED ALTERATION TO LIMITS TO DEVELOPMENT**

**Project :** CHARNWOOD LOCAL PLAN 2021-37 PRE-SUBMISSION DRAFT PLAN  
**Client :** MR S SCOTTORN  
**Site :** LAND OFF SOWTERS LANE, BURTON ON THE WOLDS, LOUGHBOROUGH  
**Scale :** 1:1250

**Drawing : Sheet 2 of 2**

**S52.1**

**Notes :**



Charnwood Local  
Plan 2021-2037  
Publication Stage  
Representation Form

Ref:  
  
(For  
official  
use only)

Please return to Charnwood Borough Council by 5PM on 23<sup>rd</sup> August 2021  
by:

- Email: [localplans@charnwood.gov.uk](mailto:localplans@charnwood.gov.uk)
- Post: Local Plans, Charnwood Borough Council Southfield Road,  
Loughborough, LE11 2TX

The Privacy Statement can be found at: [www.charnwood.gov.uk/privacy](http://www.charnwood.gov.uk/privacy)

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This form has two parts –

Part A – Personal Details: need only be completed once.

Part B – Your representation(s). Please fill in a separate sheet for each  
representation you wish to make.

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## Part A

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### 1. Personal Details\*

*\* If an agent is appointed, please complete only the Title, Name and Organisation (if applicable)  
boxes below but complete the full contact details of the agent in 2.*

### 2. Agent's Details (if applicable)

|                                  |  |   |
|----------------------------------|--|---|
| Title                            | <input type="text"/>                       | <input type="text" value="Mr"/>                                   |
| First Name                       | <input type="text" value="Mr S Scottorn"/> | <input type="text" value="Andrew"/>                               |
| Last Name                        | <input type="text"/>                       | <input type="text" value="Thomas"/>                               |
| Job Title<br>(where relevant)    | <input type="text"/>                       | <input type="text"/>  |
| Organisation<br>(where relevant) | <input type="text"/>                       | <input type="text" value="THOMAS TAYLOR&lt;br/&gt;PLANNING Ltd"/> |
| Address Line 1                   | <input type="text" value="c/o agent"/>     | <input type="text" value="Castle House"/>                         |
| Line 2                           | <input type="text"/>                       | <input type="text" value="South Street"/>                         |
| Line 3                           | <input type="text"/>                       | <input type="text" value="Ashby-de la Zouch"/>                    |
| Line 4                           | <input type="text"/>                       | <input type="text" value="Leicestershire"/>                       |
| Post Code                        | <input type="text"/>                       | <input type="text" value="LE65 1BR"/>                             |
| Telephone<br>Number              | <input type="text"/>                       | <input type="text" value="07973 667537"/>                         |
| E-mail Address                   | <input type="text"/>                       | <input type="text" value="at.ttplanning@gmail.com"/>              |

(where relevant)

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## Part B – Please use a separate sheet for each representation

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Name or Organisation: Sileby Parish Council

3. To which part of the Local Plan does this representation relate?

|           |                   |        |                        |              |                          |
|-----------|-------------------|--------|------------------------|--------------|--------------------------|
| Paragraph | Chapters<br>1 - 3 | Policy | DS1<br>OS1<br>C1<br>E3 | Policies Map | Limits to<br>Development |
|-----------|-------------------|--------|------------------------|--------------|--------------------------|

4. Do you consider the Local Plan is (please tick as appropriate):

|   |     |                          |    |                                     |
|---|-----|--------------------------|----|-------------------------------------|
| 4.(1) Legally compliant                       | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |
| 4.(2) Sound                                   | Yes | <input type="checkbox"/> | No | <input checked="" type="checkbox"/> |
| 4 (3) Complies with the<br>Duty to co-operate | Yes | <input type="checkbox"/> | No | <input type="checkbox"/>            |

5. Please give details of why you consider the Local Plan is not legally compliant or is unsound or fails to comply with the duty to co-operate. Please be as precise as possible.

If you wish to support the legal compliance or soundness of the Local Plan or its compliance with the duty to co-operate, please also use this box to set out your comments.

See attached report and plan.

(Continue on a separate sheet /expand box if necessary)

6. Please set out the modification(s) you consider necessary to make the Local Plan legally compliant and sound, in respect of any legal compliance or soundness matters you have identified at 5 above. (Please note that non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why each modification will make the Local Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.



See attached report and plan

(Continue on a separate sheet /expand box if necessary)

*Please note In your representation you should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification(s). You should not assume that you will have a further opportunity to make submissions.*

*After this stage, further submissions may only be made if invited by the Inspector, based on the matters and issues he or she identifies for examination.*

7. If your representation is seeking a modification to the plan, do you consider it necessary to participate in examination hearing session(s)?

No, I do not wish to participate in hearing session(s)

Yes, I wish to participate in hearing session(s)

Please note that while this will provide an initial indication of your wish to participate in hearing session(s), you may be asked at a later point to confirm your request to participate.

8. If you wish to participate in the hearing session(s), please outline why you consider this to be necessary:

These representations set out serious concerns regarding the overall approach to the Charnwood Local Plan development strategy and as a result consider that it is appropriate that they have the opportunity to explain their concerns and participate at the hearing sessions of the examination.

*Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate in hearing session(s). You may be asked to confirm your wish to participate when the Inspector has identified the matters and issues for examination.*

9. Signature:

A Thomas

Date:

23.8.21

## Guidance Note for Representation Form

### 1. Introduction

1.1. The plan has been published by the Local Planning Authority [LPA], Charnwood Borough Council, in order for representations to be made on it before it is submitted for examination by a Planning Inspector. The *Planning and Compulsory Purchase Act 2004*, as amended, [PCPA] states that the purpose of the examination is to consider whether the plan complies with the relevant legal requirements, including the duty to co-operate, and is sound. The Inspector will consider all representations on the plan that are made within the period set by the LPA.

1.2. To ensure an effective and fair examination, it is important that the Inspector and all other participants in the examination process are able to know who has made representations on the plan. The LPA will therefore ensure that the names of those making representations can be made **available (including publication on the LPA's website) and taken into account** by the Inspector.

### 2. Legal Compliance and Duty to Co-operate

2.1. You should consider the following before making a representation on legal compliance:

- **The plan should be included in the LPA's current Local Development Scheme [LDS]** and the key stages set out in the LDS should have been followed. The LDS is effectively a programme of work prepared by the LPA, setting out the plans it proposes to produce. It will set out the key stages in the production of any plans which the LPA proposes to bring forward for examination. If the plan is not in the current LDS it should not have been published for representations. **The LDS should be on the LPA's website and available at its main offices.**
- The process of community involvement for the plan in question **should be in general accordance with the LPA's Statement of Community Involvement [SCI]** (where one exists). The SCI sets out **the LPA's strategy for involving the community in the preparation** and revision of plans and the consideration of planning applications.
- The LPA is required to provide a Sustainability Appraisal [SA] report when it publishes a plan. This should identify the process by which SA has been carried out, and the baseline information used to inform the process and the outcomes of that process. SA is a tool for assessing the extent to which the plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- In London, the plan should be in general conformity with the London Plan (formally known as the Spatial Development Strategy).

- The plan should comply with all other relevant requirements of the PCPA and the *Town and Country Planning (Local Planning) (England) Regulations 2012*, as amended [the Regulations].

2.3. You should consider the following before making a representation on compliance with the duty to co-operate:

- Section 33A of the PCPA requires the LPA to engage constructively, actively and on an ongoing basis with neighbouring authorities and certain other bodies over strategic matters during the preparation of the plan. The LPA will be expected to provide evidence of how they have complied with the duty.
- Non-compliance with the duty to co-operate cannot be rectified after the submission of the plan. Therefore, the Inspector has no power to recommend modifications in this regard. Where the duty has not been complied with, the Inspector cannot recommend adoption of the plan.

### 3. Soundness

3.1. The tests of soundness are set out in paragraph 35 of the National Planning Policy Framework (NPPF). Plans are sound if they are:

- Positively prepared – providing a strategy which, as a minimum **seeks to meet the area’s objectively assessed needs, and is informed** by agreements with other authorities, so that unmet need from neighbouring authorities is accommodated where it is practical to do so and is consistent with achieving sustainable development;
- Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- Effective - deliverable over the plan period and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

3.2. If you think the content of the plan is not sound because it does not include a policy on a particular issue, you should go through the following steps before making representations:

- Is the issue with which you are concerned already covered specifically by national planning policy (or, in London, the London Plan)?
- Is the issue with which you are concerned already covered by another policy in this plan?

- If the policy is not covered elsewhere, in what way is the plan unsound without the policy?
- If the plan is unsound without the policy, what should the policy say?

#### 4. General advice

4.1. If you wish to make a representation seeking a modification to a plan or part of a plan you should set out clearly in what way you consider the plan or part of the plan is legally non-compliant or unsound, having regard as appropriate to the soundness criteria in paragraph 3.1 above. Your representation should be supported by evidence wherever possible. It will be helpful if you also say precisely how you think the plan should be modified.

4.2 You should provide succinctly all the evidence and supporting information necessary to support your representation and your suggested modification. You should not assume that you will have a further opportunity to make submissions. Any further submissions after the plan has been submitted for examination may only be made if invited by the Inspector, based on the matters and issues he or she identifies.

4.3. Where groups or individuals share a common view on the plan, it would be very helpful if they would make a single representation which represents that view, rather a large number of separate representations repeating the same points. In such cases the group should indicate how many people it is representing and how the representation has been authorised.

4.4. Please consider carefully how you would like your representation to be dealt with in the examination: whether you are content to rely on your written representation, or whether you wish to take part in hearing session(s). Only representors who are seeking a change to the plan have a right to be heard at the hearing session(s), if they so request. In considering this, please note that written and oral representations carry the same weight and will be given equal consideration in the examination process.

# **Charnwood Local Plan 2021-37 Pre-Submission Draft (July 2021)**

**Comments on behalf of:  
Mr S Scottorn**

Client :

**Mr S Scottorn**

Site :

**Land at Sowters Lane  
Burton on the Wolds  
Leicestershire**

**THOMAS - TAYLOR  
PLANNING LTD**



Chartered Town Planners

Castle House : South Street : Ashby de la Zouch: Leicestershire : LE65 1BR  
Registered in England & Wales No. 6183266  
VAT Registration Number 901 6888 14  
email - at.tplanning@gmail.com  
Tel - 01530 563800

### Comments in relation to:

- **Chapter 1 - Vision**
- **Chapter 2 - Development Strategy**
- **Chapter 3 - Place Based Policies**
- **Policy DS1 Development Strategy & Settlement Limits**
- **Policy OS1 - Other Settlements**
- **Policy C1 - Countryside**
- **Policy E3 - Rural Economic Development**

### Background

So far as employment and the economy is concerned, amongst other things, the Plan's Vision set out at pages 13-14 (Chapter 1) seeks to –

- improve the economy
- to provide more employment opportunities for local people
- to retain growing businesses and to secure new investment
- provide access to jobs and services for communities

Some of the objectives to achieve this vision are set out at pages 15-17 and include -

- Reducing the need to travel by car, and the distance travelled, and increase the use of walking, cycling and public transport to access jobs, key services and facilities.
- 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.
- To make efficient use of land, to limit the need for greenfield development and encourage the re-use of brownfield land and underused buildings.
- To support a strong and diverse economy that will provide more employment opportunities for local people.
- To encourage thriving and diverse sustainable rural enterprises.

The Plan's Development Strategy is set out at Chapter 2. Paragraph 2.3 states that the strategy aims to guide new development to the most suitable locations in the Borough having regard to, amongst other things, access to jobs, services, infrastructure and sustainable travel options. Paragraph 2.4 states that the development strategy aims to direct development to locations that provide access to jobs and services and paragraph 2.6 states that it has been prepared having considered reasonable alternative options for development so that it can be used to understand whether individual proposals are acceptable in principle.

Paragraph 2.28 states that the preferred strategy identifies a pattern of development that seeks to support the economy, provide a balance between homes and jobs in the Borough and to ensure access to services and facilities. It goes on to state that the development strategy has been informed by an understanding of the Borough's environment and the relationship between settlements and the countryside.

Table 4 sets out a Settlement Hierarchy where Burton on the Wolds is identified as an "Other Settlement" that has some of the services and facilities to meet the day to day needs of

residents. This level in the hierarchy is above the level of “Small Village or Hamlet” which are considered to have limited services and facilities to meet the day to day needs of the residents.

Paragraphs 2.50-2.54 refer to development within Service Centres and Other Settlements and the Countryside. They concentrate on the provision of housing and accessible primary school education with no mention of satisfying employment needs in these settlements or the Countryside. Paragraphs 2.53-2.54 confirm that The Policies Map shows the Limits to Development boundaries which are intended to define the cohesive built form of settlements, which distinguishes them from the Countryside. Paragraph 2.53 confirms that areas defined as Countryside forms the largely undeveloped land beyond the defined Limits to Development which has its own intrinsic character and beauty. Paragraph 2.53 states that Limits to Development, and by extension the edge of the Countryside, are an integral part of the development strategy to guide development to sustainable locations.

Policy DS1: Development Strategy. Whilst encouraging the efficient use of land including using brownfield or underused land and buildings, Policy DS1 sets out a general presumption against new buildings outside Limits to Development. It states that new built development will be confined to sites allocated in the Local Plan and neighbourhood plans, and other land within the Limits to Development subject to limited exceptions. It goes on to state that development proposals which do not accord with this spatial strategy will not be considered compatible with the vision or to meet the objectives of the plan and will not be considered sustainable development, and as a result will not be supported.

Complimenting the overall development strategy at Policy DS1, the Plan provides a number of Place Based Policies at Chapter 3. This includes Policy OS1: Other Settlements which reinforces Policy DS1 by supporting new small-scale development within defined Limits to Development.

Policy C1: Countryside sets out the way the Council intends to manage development in Countryside areas with, amongst other things, support for rural economic development which has a strong relationship with the operational requirements of agriculture, horticulture, forestry and other land-based industries and for the reuse and adaptation of rural buildings and small scale new built development where there would not be significant adverse environmental effects.

Policy E3: Rural Economic Development seeks to maximise the potential of the rural economy by supporting a range of development including the small scale, sustainable growth and expansion of existing businesses in rural areas through conversion of existing buildings and well-designed new buildings.



## Changes Required to the Plan

Having regard to the above, we consider that the Plan's policies referred to above require amendment as set out below and on the attached Plan S52.1 (Sheets 1 & 2) so far as they relate specifically to Burton on the Wolds and to employment development in the countryside generally.

## Settlement Limits to Development

The Settlement Limits to Development (SLtD) boundaries in the vicinity of Sowters Lane, Burton on the Wolds does not appear to reflect the Methodology and principles for defining SLtD set out in the Evidence Base. Notwithstanding the Methodology, Policies Map 1 should be corrected to identify a more appropriate and justified SLtD boundary as shown on attached Plan S52.1 (see extract at Figure 1 below):

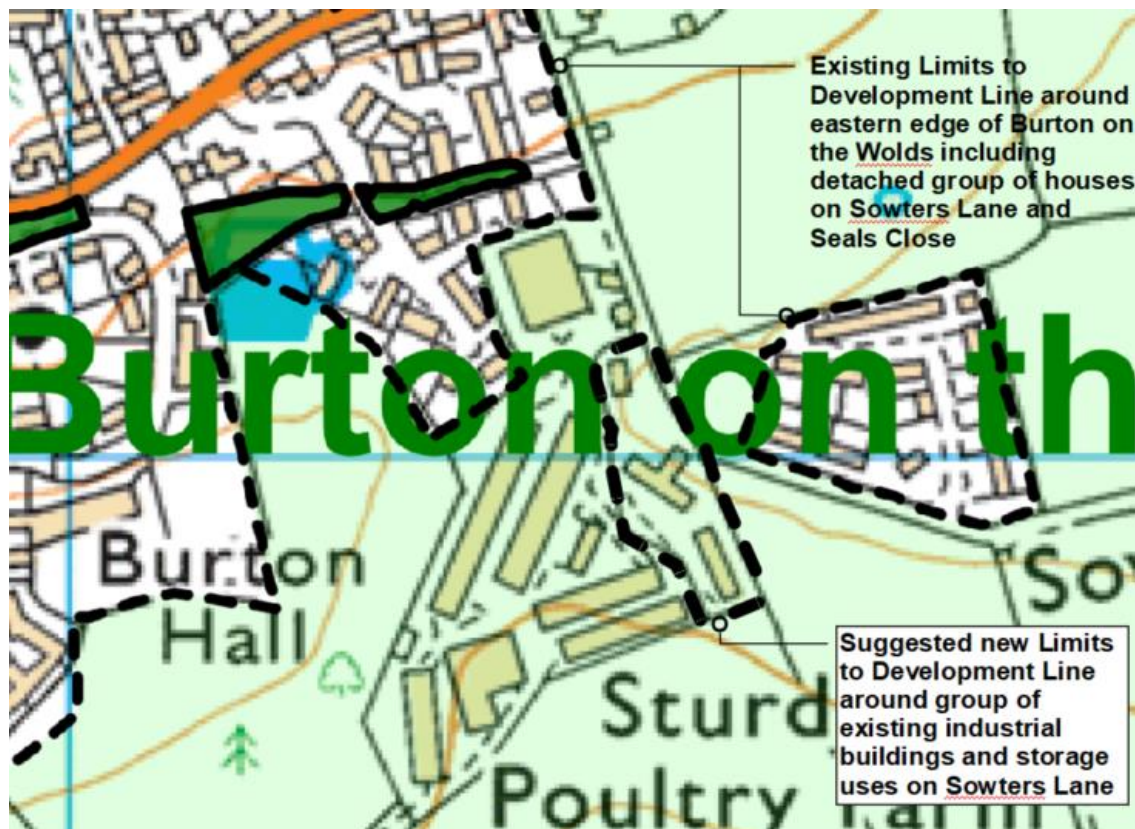


Figure 1: Extract from Plan S52.1 "Proposed Alteration to Limits to Development". To include group of existing industrial buildings and storage uses on Sowters Lane.

The SLtD boundary shown above (and on attached Plan S52.1) should be amended so as to include the land and buildings in our client's ownership within Limits to Development and to be consistent with the overall thrust of the Methodology and principles used to define the SLtD. In particular, the proposed SLtD would enclose an existing group of substantial industrial buildings and storage uses which reflect the built form of the settlement.

The proposed alteration suggested would also reflect the recent grant of planning permission Ref. P/19/0919/2 on the northern part of the site for "change of use from the storage of non-touring caravans to the storage of containers for self-storage, associated on-site parking and erection of site entrance height restrictor" at Land off Sowters Lane, Burton on the Wolds,

Loughborough, LE12 5TZ (which was approved after publication of the Plan) on 19<sup>th</sup> August 2021.

The land and buildings involved are of substantial and permanent construction (mainly brick or concrete panels with a mix of roofing materials) and are separate from the adjoining Poultry Farm. The overall character of the land is clearly industrial with extensive outside storage and parking of vehicles and materials/equipment. The land is well-defined by strong, defensible boundaries comprising mature hedges and fencing and Sowters Lane itself. These features serve to separate the built form of the site both physically and visually from the countryside beyond. The buildings and storage land are in existing industrial use and provide a source of employment for the local community.

The land and buildings are a long-standing part of the built-form of the settlement on the eastern side of Burton on the Wolds and form a cohesive group of industrial buildings and associated uses. It is noted that nearby housing development on Sowters Lane/Seals Close is further detached from the eastern edge of the settlement than these industrial buildings but are provided with a SLtD line themselves.

Principle 1 of the Settlement Limits to Development Assessment - 2018 states that the SLtD boundaries should include the curtilages of buildings which clearly relate to the building through their proximity and character. The associated storage and parking areas between the industrial buildings are physically and visually related to the buildings themselves and the proposed SLtD line would separate the built form of the settlement both physically and visually from the countryside beyond. The buildings and uses enclosed within the proposed amendment to the SLtD are both physically and visually well-related to the settlement – whether one considers their relationship to the main settlement or the houses on Sowters Lane/Seals Close or else as a cohesive group of buildings and uses in their own right. The suggested extension to the SLtD boundary identified above would satisfy both the Methodology and the Principles in the Evidence Base.

### **Policy DS1 Development Strategy**

Given the acknowledgement elsewhere in the Plan of the importance of employment and the rural economy, as well as encouraging the efficient use of land including the re-use of brownfield or underused land and buildings we consider that Policy DS1 should be amended so as to better compliment Policies OS1, C1 and E3.

We therefore suggest that the third bullet point is amended to –

- *protects the intrinsic character of the Countryside where the proposal involves employment development outside Limits to Development in accordance with Policies OS1, C1 or E3 elsewhere in this Plan*

and the ninth bullet point should be amended to -

- *makes efficient use of land including using brownfield or underused land and buildings in the Countryside, outside Limits to Development*

These changes, when coupled with our suggested changes to Policies C1 and E3 clarify that support will be given to the sustainable re-use and redevelopment of brownfield or underused land and buildings outside defined Limits to Development in rural areas which will help to balance the support given to the regeneration and economic success of urban areas.

## Policy OS1 Other Settlements

We suggest that the second bullet point of Policy OS1 is amended to –

- *is small-scale and within defined Limits to Development or else is in accordance with Policy DS1 and protects the intrinsic character of the Countryside where the proposal involves employment development outside Limits to Development*

## Policy C1 Countryside

We suggest that the first bullet point of Policy OS1 is amended to –

- *supporting all forms of rural economic development and employment creation which protect the intrinsic character and beauty of the countryside including those which have a strong relationship with the operational requirements of agriculture, horticulture, forestry and other land-based industries*

## Policy E3 Rural Economic Development

Policy E3 refers to the potential of the rural economy and supports the sustainable growth of existing businesses in rural areas. However, it does not explicitly acknowledge that many rural businesses are located in the Countryside and outside the identified Settlement Limits to Development for planning policy purposes – where other restrictive policies seek to restrict development. As presently worded, Policy E3 does not encourage the development of new businesses in the countryside.

We therefore suggest that Policy E3 is amended to –

*We will maximise the potential of our rural economy by 2037 by supporting development within the Countryside, including land and buildings outside identified Settlement Development Limits that:*

- *provides ~~small-scale~~, sustainable growth and expansion of existing and new businesses in rural areas both through conversion and re-use of existing buildings and previously developed land and through the construction of well-designed new or replacement buildings;*
- *enables farm diversification where farming remains the dominant element of the business;*
- *provides superfast broadband networks for all homes and businesses;*
- *provides tourism and leisure facilities, particularly developments that benefit the Great Central Railway, the River Soar and Grand Union Canal, the National Forest Strategy and the Charnwood Forest Regional Park; and*
- *protects the intrinsic character and beauty of the countryside is not detrimental to the character and appearance of the Countryside in terms of its scale, character or operational requirements.*

These suggested alterations seek to ensure that the economic needs of the area's communities - including the employment needs of the rural areas of the Borough - are met by 2037. In combination, these proposed alterations will support business and employment development in rural areas provided it is sensitive to the character and appearance of the

countryside. The amendments introduce some flexibility to provide a supportive planning policy environment for employment and industry in the countryside in a way which reduces the need to travel in accordance with the overall aims of sustainable development in the National Planning Policy Framework (NPPF). The conversion and re-use of existing buildings and the redevelopment of previously developed land and buildings for employment uses in the countryside helps maintain a healthy rural economy as well as the vitality of rural communities in accordance with the general thrust of the three main objectives of sustainable development (economic, social and environmental objectives set out in the NPPF).