



CABINET – 21 JULY 2026

**RESPONSE TO THE BLABY DISTRICT COUNCIL REGULATION 19
LOCAL PLAN CONSULTATION**

**SUPPLEMENTARY REPORT OF THE DIRECTOR OF GROWTH,
ENVIRONMENT AND TRANSPORT**

PART A

Purpose of the Report

1. The purpose of this report is to advise the Cabinet of the progress of Blaby District Council's (BDC) Local Plan and to present the County Council's emerging position to its Regulation 19 consultation.
2. The report also sets out the officers' recommended course of action for the County Council, in its role as Local Transport Authority, to undertake its own separate evidence work to support the progress of the Local Plan.

Recommendations

3. It is recommended that:
 - a) The proposed timetable for the progression of the Blaby District Council (BDC) Local Plan be noted;
 - b) The County Council's emerging position on BDC's Local Plan Regulation 19 consultation, set out in paragraphs 41 to 88 and the Appendix to this report be agreed, noting in particular that the County Council:
 - i. Recognises the significant challenges and pressures that Plan Making Authorities, such as BDC, are facing.
 - ii. Does not raise any fundamental issue with the Plan's spatial strategy, subject to a suitable delivery and contribution strategy, and consideration of viability implications over the plan period being set out with necessary modifications to plan policies for identified strategic sites.
 - iii. In its role as Local Transport Authority, the County Council considers that the Plan in its current form fails to meet the National Planning Policy Framework tests of soundness, insofar as its transport evidence and policy approach to mitigating cumulative transport impacts; and

- c) The Director of Growth, Environment and Transport, following consultation with the relevant Cabinet Lead Members, be authorised to make amendments to the detailed Regulation 19 response, noting that:
 - i. Amendments will take into account officers views of the recently published Whole Plan Viability Assessment and Infrastructure Delivery Plan.
 - ii. The formal response (comprising this Cabinet report and updated Appendix) will be submitted to BDC ahead of the consultation period closing on 24 August 2026.
- d) In its role as Local Transport Authority, undertakes its own separate transport evidence work given the County Council's recognition of the importance of the next Blaby Local Plan to the future delivery of strategic growth and infrastructure across south Leicestershire.

Reasons for Recommendation

- 4. The Local Plan process is the main opportunity available to planning authorities and statutory consultees to influence places on a strategic level and ensure the cumulative impacts of growth are planned for.
- 5. The County Council is therefore seeking to influence the content of the Blaby Local Plan in the interests of local communities. This includes ensuring that the Local Plan provides an as robust as possible policy platform for securing the provision of the infrastructure and services that are required to supports its successful delivery.
- 6. In its role as Local Transport Authority (LTA), the County Council undertaking its own separate evidence work will provide the LTA with sufficient evidence to appropriately demonstrate the Plan's transport impacts and associated requirements for mitigation and transport interventions. The intention is that the work would be completed and shared with the district council so as to inform discussions about, and agreement of, a schedule of proposed Main Modifications to the Plan (and to the Infrastructure Delivery Plan (IDP)) to be submitted alongside the Plan.
- 7. On 25 March 2026, new regulations came into force, which meant that the Duty to Co-operate would no longer apply to new, or emerging Local Plans. Notwithstanding this change, the National Planning Policy Framework (NPPF) (December 2024) still requires "maintaining effective co-operation" across administrative boundaries (paragraphs 26–29). Inspectors are expected to continue to examine plans in line with these policies.

Timetable for Decisions (including Scrutiny)

- 8. BDC has outlined a timetable for the submission of its Local Plan. It is anticipated that following the Regulation 19 Pre-Submission consultation and subject to approval of BDC, the Local Plan would be submitted to the Secretary of State for examination by the end of 2026.

Policy Framework and Previous Decisions

9. In 2018, the County Council, Leicester City Council, the seven district councils in Leicestershire, and the Leicester and Leicestershire Enterprise Partnership (LLEP), approved the Leicester and Leicestershire Strategic Growth Plan (SGP) which provides the long-term vision for planned growth for the area up to 2050. The SGP identifies five key growth areas and most pertinent to Blaby District are 'Leicester: Our Central City', the A46 Priority Growth Corridor and the A5 Improvement Corridor.
10. In October 2019, the Cabinet approved the response to BDC's New Local Plan Issues and Options Consultation at Regulation 18 stage, which is the first formal stage of consultation for the Local Plan.
11. The Leicester and Leicestershire Strategic Transport Priorities (LLTSTP) was approved by the Cabinet on 20 November 2020. This document has a plan period to 2050, and it was developed by the County Council and City Council alongside the SGP to ensure that the long-term development needs and associated transportation requirements are co-ordinated.
12. In March 2021, the Cabinet approved the response to a further Regulation 18 Local Plan consultation undertaken by BDC, the New Local Plan Options Consultation.
13. In 2021, the Council and its partners (Leicester City Council, the seven district councils and the LLEP), commissioned the Leicester and Leicestershire Housing and Economic Needs Assessment (HENA). The HENA, published in June 2022, provides evidence that across Leicester and Leicestershire, the projected housing need from 2020 to 2036 is 91,400 dwellings and employment land need from 2021 to 2036 is 344 hectares.
14. In December 2021, the County Council became a signatory to a Statement of Common Ground (SoCG) relating to South Leicestershire Local Plan Making (November 2021), aligning the gathering of evidence and activity in the development of new local plans for three districts in the south of the County.
15. In September 2022, the Cabinet approved the County Council becoming a signatory to a SoCG relating to Housing and Employment Land Needs (June 2022), setting out how the City Council's identified unmet needs would be accommodated in the County. BDC approved the SoCG at its Council meeting in July 2022.
16. In November 2022, the Cabinet received a paper setting out the financial implications for the County Council of delivering sustainable and inclusive growth and the approach and principles that it is proposed the Council would adopt to address and manage these risks.
17. In October 2024, the Cabinet received a paper on the Strategic Planning Issues associated with the emerging Charnwood Local Plan. This included principles for future engagement of the Local Highways Authority in other local plan

processes in light of the County Council's experience of the Local Plan for Charnwood Borough.

18. In December 2024, the Cabinet report on the Provisional Medium Term Financial Strategy 2025/26 – 2028/29 referred to the importance of Local Plans being prepared with sufficient evidence to secure contributions and delivery for critical infrastructure and that it is necessary for the district councils to work with the County Council to ensure that their Local Plans include policies that balance the need to support delivery of growth with the financial risk to the County Council.
19. In December 2025, the Cabinet received a report on Strategic Spatial and Transport Planning. This outlined proposals for the preparation of a Spatial Development Strategy and secured approval for the County Council to share initial evidence work, to undertake initial scheme feasibility and development work, outlined how this would be used by the Local Transport Authority (LTA) to input into strategic planning, including to assist the evolution of Local Plans to the submission stage and in bringing forward strategic sites allocated in those Local Plans.
20. In February 2026, the Cabinet approved the County Council becoming a signatory to a SoCG produced by the Leicester and Leicestershire local authorities relating to housing distribution following the NPPF and new Standard Method published in December 2024. BDC became signatories to this SoCG in January 2026.

Resource Implications

21. The County Council has committed significant resources to engaging in, and supporting, a collaborative approach to strategic planning in order to facilitate the delivery of growth within the County and to mitigate the negative impacts of development, to the extent that it is reasonably possible to do. The additional work identified within the report will be delivered using existing resources allocated to strategic spatial and transport planning work, as approved by Cabinet in December 2025 and the Medium Term Financial Strategy 2026.
22. As set out in the report to the Cabinet in December 2025 on Strategic Spatial and Transport Planning, securing the delivery of infrastructure, transport or otherwise (such as education, waste and health), to support the needs of Leicester and Leicestershire's growing population is becoming ever more challenging, particularly where strategic transport and education infrastructure is required to seek to mitigate the cumulative impacts of development sites across a relatively wide area of the County. The County Council seeks to achieve a more coordinated approach to locations for growth and prioritisation of its delivery relative to the prioritisation of investment in the infrastructure and services necessary to support it.
23. As part of seeking to provide necessary infrastructure to support new and existing communities appropriately, the County Council recognises that having up to date, effective Local Plans in place underpinned by appropriate policies

and delivery strategies is the most effective way to fund and deliver infrastructure, maximising the contribution from the development industry and minimising potential negative impacts of unplanned growth. However, there are now a significant number of local plans progressing in overlapping timeframes. The County Council has limited resources to support the planning authorities with Local Plan development and associated examination attendance. It may become necessary to prioritise work in this area as it may not be possible to meet all relevant requests within preferred timescales.

24. The Director of Corporate Resources has been consulted on this report.

Legal Implications

25. The preparation and examination of Local Plans is governed by a statutory framework, associated regulations, and national policy and guidance, including the NPPF. In determining whether a Local Plan is “sound”, the appointed Inspector(s) will consider, amongst other matters, whether the Plan has been positively prepared, is justified, effective and consistent with national policy.
26. The County Council’s proposed response to BDC’s Regulation 19 Local Plan consultation has been prepared having regard to this legislative and policy framework and reflects the County Council’s role as the LTA and its wider statutory responsibilities, including in respect of education and infrastructure planning.
27. The County Council must ensure that its representations are robust, evidence-based and consistent with the statutory tests and relevant national policy, noting that it will ultimately be for the Inspector(s) at Examination in Public (EiP) to determine the soundness of the Plan.
28. There is a risk that, if the Local Plan is found unsound at EiP, this may have implications for the delivery of development and associated infrastructure within the area. The County Council’s response is intended to ensure that its statutory responsibilities and interests are appropriately represented in that process.
29. The Chief Legal Officer and Monitoring Officer has been consulted on this report.

Circulation under the Local Issues Alert Procedure

30. This report will be circulated to all Members.

Officers to Contact

Ann Carruthers
 Director of Growth, Environment and Transport
 Tel: 0116 305 7000
 Email: ann.carruthers@leics.gov.uk

Janna Walker

Assistant Director, Development and Growth
Tel: 0116 305 0785
Email: janna.walker@leics.gov.uk

PART B

Background

31. The Local Plan for Blaby District was adopted by BDC in February 2019, covering the period to 2029. A local authority seeks to keep its Local Plan up to date, otherwise it is at risk of unsustainable and un-planned development.
32. The preparation of new Local Plans involves various stages of consultation. This consultation from BDC is known as a 'Regulation 19' consultation. It commenced on 8 July 2026 and will close on 24 August 2026.
33. This consultation builds on previous rounds of publication to develop the new Local Plan, in which the Council has responded to, these being:
 - a) Regulation 18 – Issues and Options (July-September 2019).
 - b) Regulation 18 – Options (January-March 2021).
34. In the County Council's response to the most recent Regulation 18 consultation in 2021, it set out that the new emerging Local Plan for Blaby District would require significant infrastructure investment and there would be a significant financial challenge to the County Council in its ability to meet the costs for essential infrastructure.

Cross-boundary Cooperation

35. On 25 March 2026, new regulations came into force which meant that the 'Duty to Co-operate' would no longer apply to new, or emerging, Local Plans. Notwithstanding this change, the NPPF (December 2024) still requires "maintaining effective co-operation" across administrative boundaries (paragraphs 26–29). Inspectors are expected to continue to examine plans in line with these policies. In this context, SoCGs remain an appropriate method to document cross-boundary strategic matters, record areas of agreement and disagreement, and set out next steps, demonstrating that effective and on-going joint working has taken place. This is particularly important for the County Council due to its responsibilities for highway and education matters, given the scale and criticality of the associated infrastructure dependencies.

Overview of Content of BDC's Pre-Submission Draft Local Plan

36. The Local Plan sets out a strategy covering the period 2025 to 2042 with the delivery of 12,953 new homes which includes a proportion of sites from existing allocations such as New Lubbethorpe. This exceeds the housing requirement of 11,195 (which includes a contribution to Leicester City's unmet need) due to the application of a buffer of around 15%.
37. The Distribution and Locational Strategy sets out that the largest proportion of growth is to be directed to the Principal Urban Area (50%) whilst Larger Villages and Strategic Sites will take 22% and 14% respectively.

38. The Local Plan sets out a minimum of 4,420 dwellings across six strategic sites:
- a) Land North of A47 Hinckley Road, Kirby Muxloe (510 dwellings in plan period).
 - b) Land West of Beggars Lane, Lubbesthorpe (825 dwellings in plan period).
 - c) Land at Carlton Park, Enderby / Narborough (560 dwellings in plan period).
 - d) Land South of Whetstone (756 dwellings in plan period).
39. Two of the proposed strategic sites are new standalone strategic mixed-use communities which will also provide housing and employment beyond the plan period.
- a) Land West of Stoney Stanton (965 dwellings in plan period).
 - b) Whetstone Pastures (800 dwellings in plan period).
40. In terms of employment, the Plan is seeking to plan for the local employment land requirement of 39 hectares, across sites at Land North of Glenfield, Land West of Stoney Stanton, Whetstone Pastures and Land South of Whetstone. The requirement for 30 hectares of strategic B8 warehousing and distribution is to be met by existing commitments, whilst sites at Land West of Stoney Stanton and Whetstone Pastures will be safeguarded to contribute towards sub-regional needs beyond the plan period.

Overarching Comments

41. The County Council recognises the importance of a Plan-led approach. It represents the best opportunity to seek to meet the needs of Leicester and Leicestershire's growing and changing population in a managed way. The County Council therefore continues to commit significant resources to support district councils in the successful development and adoption of Local Plans. This includes to ensure that an appropriate approach, justified by evidence, is identified for mitigating to an acceptable degree the impacts of Plans on the transport network and other infrastructure; to seek to ensure that sustainable growth is delivered in reality; and that there is a robust policy basis for the County Council to seek to secure developer contributions and Government funding towards necessary interventions required to enable growth.
42. The County Council recognises the strategic importance of this Plan for future spatial planning on a strategic scale through Spatial Development Strategies. In that regard, the Plan contains two strategic sites (to the west of Stoney Stanton and at Whetstone Pastures) where delivery will begin in this plan but stretch beyond the proposed Plan's timelines. But it also needs to provide the policy foundation that enables the future delivery of strategic transport infrastructure that will be critical to enabling those strategic sites to come forward over time and to the unlocking of growth more widely across south Leicestershire. Failure to achieve this will see poorly connected piecemeal development of unrelated developments across large areas as well as prejudicing future sustainable growth in Leicester Leicestershire and Rutland.

43. The County Council further recognises the significant challenges and pressures that Plan Making Authorities, such as BDC, face, given the Government's ambitions for planning reform and Local Plan coverage, and its intention/mission that 1.5 million new homes should be delivered within the lifetime of this Parliament (therefore by 2029). However, such pressures and challenges should not be taken as reasons for supporting any Local Plan regardless.

Comments of the Local Transport Authority (LTA)

44. **Spatial strategy:** Given the strategic importance of this Plan for future spatial planning on a strategic scale through Spatial Development Strategies, the LTA is not raising any fundamental issue with the Plan's spatial strategy, as it is understood that a significant number of allocation sites included in it already have or are close to securing the benefit of planning permission; and also the relatively limited choice of locations where further growth might be allocated in the district.
45. Notwithstanding this, their inclusion is contingent on the delivery of safe and suitable access and any residual cumulative impacts being satisfactorily mitigatable both on an individual and cumulative basis. Whilst only a proportion of the development quantum is indicated to be delivered over the plan period this does not obviate the need to establish these fundamental delivery requirements prior to their spatial allocation within the proposed Plan.
46. Furthermore, it is expected that site policies prescribe strategic sites be brought forward via a single outline or hybrid application and thus will need to tackle the fundamental issues of access and mitigation to gain planning approval and realise delivery.
47. The Plan as drafted therefore presents the real risk of the allocation of strategic sites which are yet to be evidenced as deliverable or the probability of their delivery in an uncoordinated or piecemeal fashion which fails to provide the necessary infrastructure, or secure contributions, which are later identified to be required to support the Plan's spatial distribution. Priority should therefore be placed on evidence and amendments to site policies that best ensure the coordinated and strategically planned delivery of the indicated spatial strategy.
48. **Position with regard to the Plan and the delivery of strategic transport infrastructure.** There are sources of evidence, such as the Strategic Transport Assessment work undertaken in support of the SGP and work looking at the transport impacts of growth across south Leicestershire through the South Leicestershire Joint Transport Evidence (JTE) which points to the need for improved strategic orbital connectivity to the south and east of the City of Leicester. That is to address current issues across the area but also to unlock future sustainable development to meet the area's housing and job needs. The JTE has its genesis in the completion of the South Leicestershire Local Plan Making Statement of Common Ground, which the Cabinet agreed the County

Council to become a signatory to in December 2021. It covers the districts of Harborough, Oadby and Wigston, Blaby and Hinckley and Bosworth.

49. The scheme identification and development work approved by the Cabinet in December 2025 includes an examination of the options for improving strategic transport orbital connectivity around the east and south of the Leicester Urban Area. Whilst this work will take around a year to complete, at this time the LTA considers that there is sufficient evidence to demonstrate that improved connectivity to the Strategic Road Network (SRN) (which is managed and maintained by National Highways on behalf of the Department for Transport) will be a key element of achieving improved connectivity.
50. With the recent disappearance from the Road Investment Strategy (RIS) process of the Leicester Western Access (aka M1 Junction 21 area) Pipeline Project there is currently no nationally proposed solution to addressing the existing congestion and safety problems on the M1 and M69 in the district so as to improve SRN connectivity. For clarity, the RIS process is the process by which funding is awarded by the Government to National Highways for the development and delivery of SRN projects; the process works in blocks of 5 years. The Leicester Western Access Pipeline project was included in RIS2 but no longer appears in the recently published RIS3 2026 to 2031.
51. In that absence the LTA welcomes in principle the incorporation into the Plan's strategic site policies of references to the need to provide south facing slip roads at M69 Junction 2 (near to Stoney Stanton) and for the provision of a new junction on the M1 (a Junction 20a) south of Whetstone. Such improved connectivity to the SRN would help longer distance journeys (existing and newly generated) to access the SRN other than via M1 Junction 21 (where the M69 joins the M1 near to Fosse Park). However, at present:
 - a) Policy S7 (Land West of Stoney Stanton) fails to provide for the safeguarding of the future delivery of the south facing slip roads.
 - b) In respect of Policy S8 (Whetstone Pasture), the concept of a new motorway junction is introduced into the Plan without any preceding context or justificatory explanation (please see also the position with regard to the Plan's transport evidence).
52. Through its Circular 01/2022 Strategic Road Network and the Delivery of Sustainable Development, the Department for Transport (understandably) sets a high evidential threshold for the creation of new connections to the SRN, especially '*on those sections of the network designed for high-speed traffic*', such as motorways. It is unknown at this time what National Highways' (on behalf of the Department for Transport) formal position will be on the Plan's inclusion of references to a new M1 Junction 20a and the addition of south facing slip roads at M69 Junction 2, nor whether it considers that the Plan is underpinned by evidence sufficient to demonstrate that there are cases in principle for the creation of these new connections to the SRN.
53. **Position with regard to the development of transport evidence:** The Plan's spatial strategy has, in general terms, been tested as part of the wider south

Leicestershire work. That work has been beneficial in terms of enabling an understanding of the strategic transport infrastructure that will be required to enable growth in the district (and more widely) to come forward. But on its own, this work was never intended to be sufficiently granular to form the basis of a 'transport strategy' to underpin the effective delivery of a Local Plan.

54. In that respect, it is welcomed that the District Council has commissioned its own transport evidence work using consultants it independently appointed. However, the LTA has not been as directly involved by the consultants as has been the usual norm for other Local Plans across the County and the outcome of the work, a 'Blaby Strategic Transport Assessment' (BSTA), was not received until 4 June 2026 (therefore only 11 working days in advance of its publication by the District Council).
55. Having reviewed the BSTA, in general terms, the LTA welcomes and supports the proposed in principle approach to seeking to mitigate the Plan's spatial strategy's transport impacts. That is broadly, through a vision-led approach, firstly to seek to minimise the need to travel outside of a development through the provision of on-site facilities (such as schools or shops); then enabling travel choice by active and sustainable interventions for travel away from a site; and then, lastly, to improve highway capacity to accommodate the residual, cumulative traffic impacts. This approach accords in principle with national planning policy.
56. However, at this advanced stage of the Plan's development, it is the LTA's view that the transport evidence base is not yet sufficiently complete. The BSTA does not appear to include the level of analysis and interpretation of transport modelling results, or the assessment of transport mitigation (including delivery timings) that the LTA would require in order to understand the Plan's likely impact and the likely success of proposed interventions design to mitigate impacts and promote sustainable growth in the area.
57. By way of some key examples, taken on its own, the BSTA does not appear to:
 - a) Demonstrate appropriately the impacts of the Plan's spatial strategy, including by comparison with a future scenario where the Plan and its proposed development do not come forward.
 - b) Demonstrate sufficiently whether the proposed in-principle approach to mitigating the transport impacts of the spatial strategy is appropriate, justified, and capable of mitigating impacts on the transport network to an acceptable degree.
 - c) Provide sufficient evidential justification for the strategic transport requirements associated with Plan policies S7 and S8, which is a particular concern in respect of the Department for Transport's Circular 01/2022 and the high evidential threshold associated with the creation of new or amended connections to the SRN.
 - d) Provide sufficient evidence to demonstrate whether the level of housing proposed to come forward on the Stoney Stanton and Whetstone Pastures strategic sites (a minimum of 965 homes and 800 homes

respectively) would be acceptable in transport terms in advance of the necessary strategic transport infrastructure.

58. The LTA recognises that the evidence base for this Plan is being developed against a National Planning Policy Framework that embeds a vision-led approach to transport planning. The LTA fully supports this approach, and hence it has published the draft Enabling Travel Choice Strategy (ETCS) that sets out, amongst other things, how it expects to see a vision-led approach applied in Leicestershire. However, it should not just be applied at a purely theoretical level. It should be supported by evidence which is specific to the place in question, in this case the District of Blaby, and to the location, scale and nature of the new communities and development sites proposed through the Plan.
59. In that regard, a number of statements and conclusions in the BSTA appear to require a clearer evidential foundation. In particular, further supporting data and a transparent analytical methodology are required to demonstrate why the proposed in-principle approach to mitigating the Plan's transport impacts is appropriate and justified, having regard to the wider evidence about Blaby District, the Plan's spatial strategy and the cumulative impacts of planned growth.
60. Ultimately, it will be for the independently appointed Inspector(s) to determine whether the BSTA is sufficient to demonstrate the Plan's transport impacts and to justify the interventions required to enable its effective delivery. However, on the evidence currently available, the LTA's concern is that the BSTA is insufficient to demonstrate that the Plan is justified, effective and consistent with national policy in transport terms. This creates a risk that the Plan may be found unsound, insofar as it relates to transport evidence and mitigation. On the evidence currently available, the LTA would not be able to support the adequacy of the BSTA through the Plan's EiP. The LTA therefore reserves the right, in fulfilment of its statutory responsibilities and in the interests of local communities, to pursue these matters through the EiP process, including by appearing in its own right at the hearing sessions if necessary.
61. Notwithstanding the above, officers have initially reviewed some modelling plots contained in an appendices to the BSTA. On the face of it, those plots appear to show that the Plan's spatial strategy will give rise to:
 - a) Impacts relating to the poor performance of the SRN, particularly M1 Junction 21. That is traffic being displaced from the M1 and M69 on to lower order roads through communities such as Enderby. These impacts are consistent with evidence prepared in respect of the refused Development Consent Order (DCO) for a proposed Hinckley National Rail Freight Interchange adjacent to M69 Junction 2. In their decision letter on the DCO, the Secretary of State referred to concerns about the impacts of that proposal on M1 Junction 21.
 - b) Traffic being displaced from the A426 and B4114 through communities such as Ashby Magna, Broughton Astley, Croft and Huncote.

- c) Impacts affecting the capacity of key junctions on the district's road network, including M1 Junction 21 and along the B4114 corridor. Whilst the evidence is not presently at a sufficiently developed stage to be definitively conclusive, it is probable that whilst the strategic sites are the biggest contributory factor to the apparent impacts nevertheless it is likely the cumulative traffic impacts from developments across the district are also a contributory factor.
- 62. Without mitigation, such impacts would have implications for the health and wellbeing of affected communities. Additionally, from an asset management perspective the impacts will increase levels of damage to routes that were never designed to be used by such volumes of traffic. Furthermore, the Plan:
 - a) Fails to set out with sufficient clarity a 'transport strategy' for mitigating its transport impacts.
 - b) Nor provides for an appropriate funding mechanism for the delivery of the transport interventions required to enable its effective delivery that risks rendering individual sites being financially unviable when considered in isolation. That is in respect of bearing alone the costs of transport infrastructure required to avoid there being severe residual cumulative highways impact, as per paragraph 116 of the National Planning Policy Framework December 2024.
- 63. It might be correct to say that some of the impacts described above will occur in any event because of general traffic growth, and further that it might be the case that the Plan's spatial strategy 'just' results in an amplification of those impacts. On the other hand, local communities do not necessarily discriminate between the causal reasons for the impacts of traffic that they experience. Furthermore, in support of Local Transport Plans, a Local Plan should be expected to have a positive role in helping to address transport issues that means the impacts of growth on local communities are minimised to the extent reasonably possible. A local plan should provide for 'good growth'. Failure to address those impacts will negatively affect the experience of new communities and performance of new businesses identified in the Plan.
- 64. **Position with regard to the Plan's underlying 'transport strategy':** The Plan as drafted contains some welcome aspects in terms of seeking to address the transport impacts of proposed allocation sites, including with site allocation policies that reference particular active and sustainable travel interventions.
- 65. Such measures should be beneficial in terms of mitigating the impacts of individual sites. But the Plan should also seek to consider and address its spatial strategy's overall cumulative impacts on the transport system (such as those set out in paragraph 59). In that respect, the Plan contains numerous references to the '*Council's Local Plan Transport Strategy*', but it is unclear as to what that actually is.
- 66. Chapter 10 includes wording on sustainable travel that, along with Policies INF4: Sustainable Travel in New Developments; INF5: Active and Healthy Travel; and INF6: Public Transport, might possibly be considered to be the

essence of the 'Local Plan Transport Strategy' but the Plan at present is nowhere near as clear as the recently adopted Charnwood Local Plan 2021 to 2037 (in particular paragraphs 9.17 to 9.29 and Policy INF2 Development and Delivery of Transport Strategies) in demonstrating a 'transport strategy' that is appropriate and justified in response to suitable evidence about current and future conditions on the transport network. There is a concern that this lack of clarity brings the risk of the Plan being found to be unsound from a transport perspective or that the delivery may be undermined through the development management process.

67. **Position with regard to a funding mechanism to the deliver any 'transport strategy':** At present the Plan lacks any coherent approach to seeking to secure developer contributions towards the delivery of transport measures to address cumulative impacts. This risk is rendering individual sites financially unviable when considered in isolation.
68. Experiences with the Charnwood Local Plan have demonstrated the legality issues involved with seeking to collect Section 106 contributions towards transport measures required to deal with cumulative impacts, even where there is a clear strategy approach supported by clearly worded Plan policies. Essentially such contributions have to be considered against the 'Community Infrastructure Levy (CIL) tests' and to be lawful it must be possible to demonstrate that they are:
 - a) Necessary to make the development acceptable in planning terms.
 - b) Directly related to the development.
 - c) Fairly and reasonably related in scale and kind to the development.
69. The meeting of these tests can be difficult to evidence, especially where a location of cumulative transport impact is remote from the sites that are contributing to that impact.
70. Where evidence demonstrates significant cumulative impacts arising from planned growth, the appropriate delivery mechanism for infrastructure which is critical to the successful delivery of the Plan's growth is a CIL, which should be developed concurrently with a Local Plan.
71. **Position with regard to the Plan's support for the delivery of the Leicestershire Local Transport Plan (LTP4):** The Introduction to the Plan, where it sets the other plans that have informed its development, fails to include reference to the LTP4 and to explain how the Plan will help to support the delivery of the LTP4's core themes and policies.
72. However, it is welcomed that the district council has been proactive in picking up on the draft ETCS. Certain aspects of the Plan pick up on the essence and phraseology of it, and in principle Policy INF4 is particularly welcomed. But there is more that could be done to strengthen the effectiveness of the Plan in supporting the delivery of the ETCS. The LTA would welcome the opportunity to explore with the district council the identification and agreement of proposed Main Modifications in this respect.

Comments on Education Matters

73. Concerns are also raised from an education perspective. For site allocations where education provision contributions have not been specified, text needs to be added to the Plan to reflect the need for financial contributions towards the provision of early years, primary, secondary and special education places to meet the identified need for additional school places, where appropriate.
74. It is considered that the Plan should also refer to a land equalisation mechanism for the two main strategic sites at Whetstone Pastures and Land West of Stoney Stanton. Given the cross-boundary element of the West of Stoney Stanton site, BDC and Hinckley & Bosworth Borough Council will need to have due regard to secondary provision.

Further comments

75. Alongside the BTSA, the County Council is aware from BDC's website that in June 2026, it has also published, inter-alia, two other very significant documents with which the Authority would normally have expected to have been closely involved with during their development. These are:
 - a) Whole Plan Viability Assessment – WPVA - (March 2026). This provides evidence to inform the production of appropriate policies and growth options and ensure that growth proposed through the emerging Local Plan is financially viable and deliverable.
 - b) Infrastructure Delivery Plan – IDP - (June 2026). This provides an assessment of the infrastructure needed in Blaby District to support the delivery of the emerging new Blaby Local Plan.
76. It has not been possible for officers to review these complex and lengthy documents in the time available prior to finalising this report. However, as an initial observation, the comments in this report and the regulation 19 response should further influence the content of these documents.
77. Officers will review both documents and in consultation with the relevant Lead Members will prepare and submit comments on them as necessary as part of the authority's overall consultation response.
78. Public Health has worked closely with BDC on the policy requirement of Health Impact Assessments alongside applications for some development. Final policy wording for the Health Impact Assessment section in Policy HW1: Healthy Communities was sent in May 2026. Overall, Public Health is pleased to see the inclusion of policy recommendations, although note the removal of requiring a Health Impact Assessment on 'Development in areas of public health concern including areas vulnerable to worsening health inequalities (as indicated in the guidance notes on the Leicestershire County Council webpage)'. It is suggested the wording is included back in the policy.

79. Heritage matters are generally considered to be adequately reflected throughout the Local Plan and will enable appropriate consideration of sites through the planning process.
80. It is considered that some aspects of policy wording around flood risk should be strengthened, including around the ability to enforce easements on ordinary watercourses.

Concluding comments and next steps

81. The County Council acknowledges that there are welcome aspects to the Plan as outlined in its key comments.
82. However, it is the County Council's view (including in its position as the LTA) that this is insufficient to outweigh other factors in respect of the current position with regard to the Plan's transport evidence base and the Plan's content from a transport perspective. The County Council considers that the Plan in its current form fails to meet the National Planning Policy Framework tests of soundness insofar of its effectiveness, that is:
 - a) The evidence set out in the BSTA appears:
 - i. To be insufficient to demonstrate appropriately the Plan's transport impacts and to justify the interventions required to enable its effective delivery and to mitigate the impacts of its spatial strategy on the transport network to an acceptable degree;
 - ii. To fail to provide any evidential justification for the strategic transport requirements associated with Plan policies S7 and S8 (this is in respect of Circular 01/2022 and the high evidential threshold it sets with regard to the creation of new connections to the SRN).
 - b) The Plan lacks clarity in demonstrating a 'transport strategy' that is appropriate and justified in response to suitable evidence about current and future current conditions on the district's transport network.
 - c) It lacks any coherent, (likely) lawful policy approach to seeking to secure developer contributions towards transport measures required to address cumulative transport impacts.
83. Furthermore, it is unknown at this time what National Highways' formal position will be on the Plan's inclusion of references to a new M1 Junction 20a and the addition of south facing slip roads at M69 J2. But the transport evidence presently available is not sufficient for the County Council to conclude whether the levels of housing proposed to come forward on the Plan's Stoney Stanton and Whetstone Pastures strategic allocation sites in advance of strategic transport infrastructure would be acceptable in transport terms.
84. Having carefully weighed matters in balance, including resourcing and financial implications, given the County Council's recognition of the importance of the next Blaby Local Plan to the future delivery of strategic growth and infrastructure across south Leicestershire, officers' recommended course of action is that the LTA should undertake its own separate evidence work.

85. Such work would, like the BSTA, reflect the national policy 'vision led' approach, but would also provide the LTA with sufficient evidence to demonstrate appropriately the Plan's transport impacts and to identify and justify the interventions required to enable its effective delivery and to mitigate the impacts of its spatial strategy on the transport network to an acceptable degree. It would further seek to understand and provide evidence to the LTA's satisfaction the relationship between the Plan's growth proposals and the need for interventions on the SRN (either within the current Plan period, or for the delivery of such to be safeguarded within this Plan for delivery beyond its timeframe). The intention is that the work would be completed and shared with the district council so as to inform discussions about and agreement of a schedule of proposed Main Modifications to the Plan (and to the IDP) to be submitted alongside the Plan (which it is currently understood will be towards the end of this calendar year).
86. This is a highly unusual situation, and it is unclear how the Inspector(s) ultimately appointed to assess the Plan through its EiP will respond to it. Nevertheless, it is officers' recommendation that this approach represents the best way to support the adoption of a new Blaby Local Plan that will be effective in seeking to minimise the transport impacts of growth on local communities to the extent reasonably possible.
87. The County Council reserves its position on the stance it will take on the Plan through its EiP hearing sessions dependent on the outcomes of its own proposed transport evidence work and on the outcomes of subsequent discussions with the district council about such outcomes.
88. It is accepted though, that, ultimately, through the Plan's EiP, it will be a matter for an independently appointed Inspector(s) to determine whether the Plan is sound or not.

Equality Implications

89. There are no equality implications arising directly from the recommendations in this report.

Human Rights Implications

90. There are no human rights implications arising directly from the recommendations in this report.

Environmental Implications

91. The County Council will continue to work closely with BDC and other partners to minimise the impact of the planned growth on the environmental assets of Leicester and Leicestershire.

Partnership Working and Associated Issues

92. The County Council works closely with the Leicester and Leicestershire Strategic Planning Partnership, which includes BDC, the other six district councils in Leicestershire, Leicester City Council and the Leicester and Leicestershire Business and Skills Partnership.
93. On 16 July 2026, the Government announced its decision on local government reorganisation for Leicester, Leicestershire and Rutland. The decision provides for the establishment, from 1 April 2028, of two unitary councils for the area. Whilst the existing councils will continue to operate until implementation of the new arrangements, significant transition and implementation work will now be required. The County Council recognises the importance of maintaining constructive and collaborative working with Leicester City Council, Rutland County Council and the district and borough councils during this period to support effective planning and continuity of services for local communities.

Background Papers

Report to the Cabinet on 23 November 2018: Leicester and Leicestershire Strategic Growth Plan – Consideration of Revised Plan for Approval

<https://bit.ly/3FbUsNL>

Report to the Cabinet on 22 October 2019: Response to Blaby District Council's New Local Plan Issues and Options Consultation

<https://bit.ly/4nXXz0G>

Report to the Cabinet on 20 November 2020: Leicester and Leicestershire Strategic Transport Priorities 2020 to 2050

<https://bit.ly/3Uj5oxc>

Report to the Cabinet on 23 March 2021: Response to the Blaby District Council New Local Plan Options Consultation

<https://bit.ly/4v6xUoG>

Report to the Cabinet on 22 June 2021: Urgent action taken by the Chief Executive in relation to the Leicester and Leicestershire Statement of Common Ground relating to housing and employment land needs (March 2021)

<https://bit.ly/3ueF6S8>

Report to the Cabinet on 23 September 2022: Leicester and Leicestershire Authorities – Statement of Common Ground relating to Housing and Employment Land Needs

<https://bit.ly/3EbMySG>

Report to the Cabinet on 25 November 2022: Managing the Risk Relating to the Delivery of Infrastructure to Support Growth

<https://bit.ly/3EN8P9Z>

Report to the Cabinet on 22 October 2024: Strategic Transport Planning Issues Associated with the Emerging Charnwood Local Plan

<https://bit.ly/4h6lZR3>

Report to the Cabinet on 16 December 2025: Strategic Spatial and Transport Planning

<https://bit.ly/4s1h1Lj>

Report to the Cabinet on 3 February 2026: Leicester and Leicestershire Authorities – Statement of Common Ground Relating to Housing Distribution

<https://bit.ly/4uWtujG>

Appendix

Draft Response to Blaby Regulation 19 Pre-Submission Consultation Draft Local Plan (2025 – 2042) – July 2026

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Comments from Leicestershire County Council

<i>Any overarching comments</i>	Public Health and Planning at Blaby have worked closely on the policy requirement of Health Impact Assessments alongside applications for some development. Final policy wording for the Health Impact Assessment section in Policy HW1: Healthy Communities was sent May 2026. Overall Public Health are pleased to see the inclusion of policy recommendations, although note the removal of requiring a HIA on <i>‘Development in areas of public health concern including areas vulnerable to worsening health inequalities (as indicated in the guidance notes on the Leicestershire County Council webpage).’</i> It is suggested the wording is included back in policy, as has already been communicated directly to Blaby colleagues. The following sentence (or similar wording) should be included in all site allocations from Land Rear of County Hall, Glenfield (page 112) onwards where education provision contributions have not been specified. • “Provision of financial contributions towards the provision of early years, primary, secondary and special education places to meet the identified need for additional school places, where appropriate.” The Regulation 19 Local Plan for Blaby does not explicitly refer to land equalisation as a mechanism for the two main strategic sites at Whetstone Pastures and Land West of Stoney Stanton. We would therefore request that due consideration be given to land equalisation, particularly in relation to Stoney Stanton where there is also a cross-boundary element with Hinckley & Bosworth Borough Council concerning secondary provision. The plan requirement sets out 11,195 new homes, 39 hectares of local employment land and 30 hectares of strategic warehousing for the period 2025 to 2042. With regard to residential: - 6,188 new homes within the PUA - 1,765 within the two strategic standalone junctions. - 2,917 Blaby town and other larger villages - 1,487 medium villages and non-strategic sites - 116 from small villages. These values demonstrate as a proportion of overall delivery, the two standalone strategic allocations comprise only circa 15% of total housing provision. There are two important implications of this which should be noted. 1. This leaves a significant balance of housing provision which will not benefit for its impacts and infrastructure being accommodated and catered for through
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strategic policies and proposals, a situation addressed in Charnwood through the development of a CIL. 2. The spatial allocation and geographical commitment of two significant strategic allocations will be fixed, but from the perspective of an evidence base that only considers a small proportion of their overall quanta. i.e. for Land West of Stoney Stanton (LWoSS) 965 dwellings out of 5,165 (19%) and for Western Pastures (WP) 800 dwellings out of 4500 (18%).

In short, the evidence and forecast period has determined, based on the impact of 1,765dws (800+965) the appropriateness and acceptability of these two allocations which together present a total of 9,665dws when fully delivered. The plan alludes to the requirement for strategic infrastructure by way of a new M1 J20a and south facing slips onto the M69 as being required by virtue of land safeguarding however provides no commitment or requirement for these over the plan period. The consultation plan is therefore silent on the delivery approach, contribution strategy or viability implications of these significant infrastructure requirements over the plan period and beyond.

Whilst no requirement is included in the plan policies, it is anticipated that each strategic allocation (Whetstone Pastures and Land West of Stoney Stanton) would come forward as singular outline planning application. The assessment and determination implications of this is very important. Whilst only a proportion of the allocations are presented and considered through the Plan testing and infrastructure requirements set out, in order to realise housing delivery on these sites an application will have first been submitted to and approved by the relevant determining authority. This will therefore have considered the full scale of development sought and thus assess the impacts of, and develop mitigation strategies for, the full site allocation. The delivery approach, contribution strategy and viability implications of these significant infrastructure requirements will therefore need to be considered in detail over the plan period and necessary to ensure that the allocations are brought forward in an appropriate and policy compliant manner. The absence of relevant details, evidence and delivery mechanisms presents a real risk that these sites may not be deliverable at all over the plan period which will have a significant impact on housing delivery.

Allied to the above it is highly likely that due to the infrastructure requirements that are anticipated to be required to deliver the full scale of development sought, determination of these applications could in the end be via Development Consent Order as Nationally Significant Infrastructure Projects (NSIP). We have raised this risk with the LWoSS team who are confident the provision of slips may not trigger an NSIP though it is unclear if they have discussed or confirmed that position with Blaby District Council. In either case though the determination of such an application would look to the Local Plan policy for its policy requirements or delivery mechanism and as presently drafted there are significant gaps in the plan.

Similarly, based on other available evidence and assessment it is probable that comprehensive strategic interventions are required, and could be sufficient to deliver the scale of growth proposed over the plan period and as presented. It is also reasonable to predict that the cost of this infrastructure may well exceed what any one development could support in isolation and therefore a district wide strategy to deliver necessary infrastructure would typically be expected. As presented in the bullet point list above, the spatial strategy proposed includes several thousands of houses that will impact and could reasonably be

expected to proportionately fund necessary infrastructure. The transport evidence supporting the plan provides no support to such an endeavour and nor does Policy INF1: Developer Contributions (Strategic) other than in very general and vague terms.

A review of the Blaby Local Plan Infrastructure Delivery Plan June 2026 indicates that para 3.4.18 reads *as of June 2026, the work that SLR are undertaking to refine and confirm the scale and form of highway mitigation required is ongoing*. Notwithstanding this, localised schemes and improvements have been developed and costed in support of the plan (e.g. para 3.4.24 circa £27,943,000) but concludes *existing traffic levels are already high and the resulting does not therefore represent mitigation wholly related to the Local Plan growth...as such it is assumed at this stage that the majority of the junction interventions will be funded via Leicestershire County Council*. This is a very unusual approach and it is unclear to what extent the stated infrastructure and Local Plan evidence is used to draw conclusions over the necessary infrastructure costs to support the Plan and which will feed through to site and plan viability calculations. Notwithstanding this, strategic infrastructure proposals are notable by their absence and therefore do not appear to feature either as a necessary requirement to support the spatial strategy proposed nor in line with the Strategic Growth Plan which provides an agreed framework to use when preparing individual Local Plans.

Turning to employment land, whilst it is understood that the ability to front load infrastructure for residential development is difficult owing to the slow build out and occupation timescales, the opportunity to utilise employment land for this purpose appears to be missed. A very even split of employment floorspace is shared between the WP and LWOSS sites, 25,600sqm each with 22,400 each left for beyond the 2042 plan period. Additional land safeguarded *beyond the plan period* totalling 420,000sqm is indicated. Given the opportunity to utilise the viability and cashflow benefits of this employment development it is unclear why this would be reserved for beyond the plan period. Detailed viability and delivery phasing may well show that this could enable earlier delivery of strategic infrastructure and therefore further clarification and explanation of this approach should be shared.

To summarise site specific comments are as follows:

Land West of Stoney Stanton

- Developer land holding (red line shown) only includes slip on western side of M69. Unorthodox eastern slip arrangement not expected to be technically compliant.
- Employment land safeguarded west of M69 indicated beyond the plan period yet this is probably required to fund M69 works.
- No agreement on evidence to say 965dws can be delivered before the M69 slips.
- Fundamental reason for refusal of HNRFI included the highway safety impact in Sapcote in part brought about by south facing slips and induced demand through villages. Blaby District Council objected on these grounds. What strategic evidence is available to show that the Stoney Stanton link road mitigates impacts in Sapcote and if so when is this required by? In effect all eggs are in one basket with this and we are not aware how thoroughly it has been tested.

	- No viability evidence to support LWoSS to demonstrate necessary infrastructure is affordable without wider funding. If so no strategy or mechanism is yet provided for this. The Local Plan may therefore allocate an undeliverable site as presented. - What policy or evidential backing does inclusion of a new rail station between Hinckley and Narborough have? This was explored through the HNRFI and feedback from Network Rail was that it wouldn't stack up in patronage or timetabling terms. - The IDP is silent on strategic infrastructure, whilst the Local Plan makes reference to the potential for CIL or pooled contributions, the transport evidence base is severely lacking from the perspective of providing meaningful support to infrastructure that is expected to be required to deliver the scale of growth indicated. - Transport evidence discounts M1 J21 impact yet this formed a fundamental part of BDC objection to HNRFI. Strategic Growth Plan provides valuable evidence for J20a being supportive to lessening impacts at J21 yet this part of the narrative appears to be missing from the Plan. - Has a comprehensive assessment of the full scale of development been undertaken and if so consideration to the anticipated infrastructure and phasing requirements? If this is being left to the Development Management process this poses significant risks of unknowns and non-delivery. If wider contribution is required to the ultimately determined mitigation requirements that are determined through an application that will be forthcoming over the plan period (if accepting it won't all be built over the plan period) then the opportunity to utilise the plan to pool necessary contributions could be lost. Whetstone Pastures - The policy safeguards 280,000 sqm employment land until completion of a new motorway junction on the M1. How therefore is this envisaged to be delivered? What transport evidence is this policy position based on? Is a J20a in isolation acceptable or is wider east west connectivity also required or complementary improvements brought about by induced demand of a new motorway junction? These do not appear to be captured in the Plan. - 800 dwellings are indicated to be deliverable over the plan period however the evidence for this is unconfirmed. - Has a comprehensive assessment of the full scale of development been undertaken and if so consideration to the anticipated infrastructure and phasing requirements? If this is being left to the Development Management process this poses significant risks of unknowns and non-delivery. If wider contribution is required to the ultimately determined mitigation requirements that are determined through an application that will be forthcoming over the plan period (if accepting it will not all be built) then the opportunity to utilise the plan to pool necessary contributions could be lost.
Section	Specific comments (please include paragraph numbers/page numbers where relevant)
Chapter 1: Introduction	Under the 'sub-regional planning' title, the wording should include reference to LTP4 and describe how the Local Plan will help to deliver on its Core Themes and Policies.

	Within paragraph 1.14, reference should make mention of any emerging/future Neighbourhood Plans as these are likely to be ‘Made’ within the lifetime of the Local Plan. In paragraph 1.15, it would be helpful to set out the support the LPA will provide to a Neighbourhood Plan group, should a review of the Neighbourhood Plan be required following Local Plan adoption. It would also be useful to mention LNRS to be embedded within policies as part of Local Green Spaces paragraph.
Chapter 2: Spatial Portrait, Vision and Objectives	We welcome Environment and Climate Change objectives, especially on resilience and climate change adaptation and efficient use of resources, minerals and waste. Paragraph 2.2 under Spatial Portrait has a word missing, it should read “It is helpful to reflect on the character of the Blaby <i>District...</i>” Paragraph 2.3 under Spatial Vision, could include reference to new communities. Paragraph 2.5 under Spatial Vision references education, communities and leisure facilities. Whilst it is good to see this in the context of the emerging LTP4 Enabling Travel Choice Strategy (ETCS) this text needs to be modified to pick up on the language of the ETCS, i.e. Plan needs to play its role in enabling travel choice to such places. This also needs to be reflected in the site specific policy content. E.g. where is this relationship identified and the need to enable access to such required to be a consideration of new development? Paragraph 2.14 under Spatial Portrait includes the text “...in much of the District’s road network is under significant pressure and operating at or close to capacity and further growth will need to be supported by road capacity enhancements and improvements to active travel infrastructure.” The Plan needs to reflect current issues in and around M1 J21 and the M69. From the LTA’s perspective, the Plan’s transport evidence base at present fails to provide sufficient understanding and analysis of the Plan’s spatial strategy’s forecast transport impacts. meaning at present the Plan cannot properly demonstrate how its policies and the Plan's proposed funding mechanism have been developed in response to that evidence, including how they will help to address cumulative and cross-boundary transport impacts. Under the ‘Strategic Objectives’ heading, the Infrastructure sub-heading should be amended to ‘Infrastructure and Services’. Paragraph 15 under this heading, “To work with partners to ensure the timely provision of infrastructure needed to support existing and new communities” should be amended to explicitly include reference to securing funding, too.

	<u>Comments from an LCC Landowner Perspective</u> Whilst the vision and objectives are largely supported, the following objective could be included in the housing section “To maintain and enhance the vitality of our settlements by the provision of additional high quality housing and business opportunities to support their continued role as thriving self-sustaining communities.
Chapter 3: Spatial Strategy	
Policy S1: Location and Growth Strategy	The supporting text includes the following wording “However, as we move towards the end of the Plan Period and beyond, in line with the vision and objectives outlined in the Blaby and Leicester and Leicestershire Strategic Growth Plans, and the aspirations of our local communities, there will be greater emphasis on delivering growth in new communities.” It is considered that the ‘transport strategy’ for enabling the Plan’s effective delivery needs to reflect this. But, at present from the LTA’s perspective, the Plan’s transport evidence base at present fails to provide sufficient understanding and analysis of the Plan’s spatial strategy’s forecast transport impacts. meaning at present the Plan cannot properly demonstrate how its policies and the Plan’s proposed funding mechanism have been developed in response to that evidence, including how they will help to address cumulative and cross-boundary transport impacts. <u>Comments from an LCC Landowner Perspective</u> Policy S1 sets out the overall spatial development strategy for the District over the period to 2042. It sets out a minimum housing requirement of 11,195 homes, 39 hectares of local employment land and 30 hectares of strategic employment land and sets out the settlement hierarchy with settlements grouped according to the level of local services, access to public transport and access to employment opportunities; Paragraphs 3.7 to 3.11 setting out the supporting text and evidence base all of which appear appropriate
Policy S2: Strategy for Housing	There is no mention that housing numbers are provided for Neighbourhood Plan areas, which are then included within their plans. <u>Comments from an LCC Landowner Perspective</u> Table 1 sets out a total of 12,953 homes to be delivered in the period to 2042 which are to be distributed across the settlement hierarchy and ensuring that growth takes place in the most sustainable settlements and recognising that large strategic sites can provide sustainable locations for growth. It is noted that the proposed housing numbers include a c. 15% buffer to provide flexibility and take account of any future non-delivery. However, it is considered that the total housing number should also reflect the potential shortfall in affordable housing the need for which currently stands at 536 homes per annum and accordingly a further increase in the buffer to say 20% would help to improve the current position.

	Whilst the distribution of housing across the settlement hierarchy broadly meets expectations in respect of medium villages it is noted that the distribution of housing numbers between the various settlements is uneven with no sites allocated in Croft to help sustain the primary school and other essential local services in addition to delivering much needed affordable housing. It is therefore suggested that the County Council's site at Poplars Farm Croft (SHELAA ref CRO006) situated in a sustainable location immediately adjoining the village envelope which is considered to be available deliverable and developable be allocated to meet Croft's ongoing housing needs.
Policy S3: Strategy for a Prosperous Economy	We welcome and support Policy S3. There is an opportunity to change criterion G to '<i>Supporting local businesses to participate in the green <u>and circular</u> economy; and</i>' <u>Comments from an LCC Landowner Perspective</u> Policy S3 is broadly supported recognising that it aligns with the wider employment needs of the Leicester and Leicestershire economic area.
Policy S4: Site Allocations for Housing	We welcome reference to Site Selection Methodology Report 2026 which includes individual site assessments. We have previously commented on Minerals and Waste safeguarding issues for individual sites. Whilst the Minerals safeguarding issues are frequently mentioned in the Plan, waste safeguarding issues do not seem to be. There may be cumulation with other large-scale developments on waste and waste water infrastructure. This is in addition to the waste safeguarding issues regarding the ability of the site to continue to operate or extend if sensitive uses are developed closer to it (NPPF 'agent of change' and LMWLP Policy W9 are relevant considerations). <u>Comments from an LCC Landowner Perspective</u> Policy S4 sets out the proposed housing allocations and the expected numbers to be delivered during the plan period. In addition to the Land West of Stoney Stanton SDA the County Council as landowner strongly supports the allocation of sites H1E – Land east of Lutterworth Road, Blaby and H1O – Land at Steeplechase Farm, Kilby for which separate detailed responses will be submitted. Further, it is confirmed that both are available and deliverable with proposed housing numbers being delivered within the plan period in accordance with the proposed trajectory.
Policy S5: Site Allocations for Local and Strategic Employment Uses	No comments. <u>Comments from an LCC Landowner Perspective</u>

	The allocation of strategic and local employment within the Land West of Stoney Stanton SDA is supported.
Policy S6: Comprehensive Development and Masterplanning of Strategic Sites	There is some welcome wording in this policy that reflects the Enabling Travel Choice Strategy. Under Policy wording part C, ii, the text should include “...in places beyond the development;” at the end of the paragraph. Under Policy wording part C, iv, it is not clear how developers will engage with local communities, to ensure the integrated and mixed-use communities, as highlighted in the wording. Under Policy wording part E, vii, “Infrastructure Delivery, Phasing and Management Strategy;”, it is queried whether this policy needs to include a general point about safeguarding for the future delivery of strategic infrastructure, including transport, in line with the relevant site specific policies. In the supporting text under ‘Land West of Stoney Stanton Strategic Site’, the text reads “The Site will be delivered in a phased manner and the later phases of development will be infrastructure led, supported in the longer term by the delivery of south facing slip roads at the existing motorway junction as well as new primary schools, secondary school, local centres, health care and other community facilities.” There is nothing the Plan’s transport evidence at present to evidence this statement, and in any event as Policy S7 acknowledges, at least the B8 element of the development is dependent on the provision of the south facing slips. <u>Comments from an LCC Landowner Perspective</u> The County Council’s response as a landowner will form part of the wider response to be submitted separately in respect of Land West of Stoney Stanton.
Policy S7: Strategic Site – Land West of Stoney Stanton	Some elements of the Policy reflect the emerging Enabling Travel Choice Strategy, but there needs to be more of a focus on developing evidence to understand where residents of this new place might need to access services and facilities in the world beyond the development and how that access (connectivity) is to be provided for by an appropriate choice of travel. Regarding Policy S7, under Employment, Point 10, the text reads “The development of this part of the site will be subject to the provision of new slip roads onto junction 2 of the M69 and is likely to be delivered beyond the Plan period”, there is however, no policy safeguarding for the provision of the slip roads.

	Regarding Policy S7, under Transport Infrastructure, Point 20, the text reads “A Mobilisation and Active Travel Strategy conforming to the Council’s Local Plan Transport Strategy will be prepared and submitted with a planning application. The transport strategy has not yet been made available. Under the support text, Part C, The development of this part of the site will be subject to the approval and commencement of new slip roads onto junction 2 of the M69 and is likely to be delivered beyond the Plan period. The word ‘commencement’ should be replaced with the word ‘delivery’. Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the Local Plan is adequate to facilitate and guide appropriate consideration through the planning process. We welcome measures to prevent sterilisation of the mineral resources within the site and within 500m of the site. It would be helpful to know what, if any, support the LPA would provide for creation of Parish Council and Neighbourhood Plan for a new community. There is no mention of LNRS in Neighbourhood Policies either under the Open Space or Environment sections. <u>Comments from an LCC Landowner Perspective</u> The County Council as part owner of the site and co-promoter of the proposed Strategic Development Area strongly supports its allocation as a Strategic Site. A separate detailed consultation response will be prepared and submitted in respect of this and the wider plan policies.
Policy S8: Strategic Site – Whetstone Pastures	Regarding paragraph 24, The existing wording is focussed on not making flooding worse. A stronger position would be to push the NPPF requirement for development to ‘<i>where possible...reduce flood risk overall</i>’. Existing wording: 24. Make provision for a drainage and water management strategy for the site to ensure the development does not increase flood risk on site or downstream including in relation to the Whetstone Brook, together with the provision of a sustainable drainage system incorporating natural flood management principles in accordance with flood risk and drainage policies set out elsewhere in this plan. Requested amended wording:

	<i>24. Make provision for a drainage and water management strategy for the site to ensure the development reduces fluvial flood risk downstream in relation to the Whetstone Brook, together with the provision of a sustainable drainage system incorporating natural flood management principles in accordance with flood risk and drainage policies set out elsewhere in this plan.</i> Some elements of this Policy reflect the emerging Enabling Travel Choice Strategy, but there needs to be more of a focus on developing evidence to understand where residents of this new place might need to access services and facilities in the world beyond the development and how that access (connectivity) is to be provided for by an appropriate choice of travel. On Point 18, under Transport Infrastructure, “<i>Land to be protected from built development within the site for the provision of a new Junction onto the M1 Motorway (Junction 20a), together with local capacity and safety enhancements to the A426 and Willoughby Road to accommodate the new junction. Further land to the east of the junction to be laid out so as not to prejudice the delivery of a future growth corridor needed to facilitate long term growth to the south and east of Leicester.</i>”) it is considered that whilst other evidence exists to demonstrate the in principle need for such, at present there is nothing in the Plan up to this point that leads any one reading it to see this as a natural conclusion of a narrative, nor will the Inspector see anything in the Plan’s transport evidence base that would justify this. Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the Local Plan is adequate to facilitate and guide appropriate consideration through the planning process.
Policy S9: Land to the North of the A47 Hinckley Road, Kirby Muxloe - Strategic Development Site [Hastings Fields Phase 2]	Some elements of this Policy reflect the emerging Enabling Travel Choice Strategy, but there needs to be more of a focus on developing evidence to understand where residents of this new place might need to access services and facilities in the world beyond the development and how that access (connectivity) is to be provided for by an appropriate choice of travel. Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the Local Plan is adequate to facilitate and guide appropriate consideration through the planning process.
Policy S10: Land West of Beggars Lane, Lubbesthorpe - Strategic Development Site	Regarding Paragraph 1E, it is not clear why this policy wording is different from the wording in S7, S8 and S9. This leaves this policy with no real reference to the Enabling Travel Choice Strategy.

	Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the Local Plan is adequate to facilitate and guide appropriate consideration through the planning process. As above
Policy S11: Land at Carlton Park, Narborough - Strategic Development Site	We welcome the requirement for the carrying out of a Minerals Assessment. This should be in line with Policy M11 of the LMWLP (typo states M1 at p.67). Regarding Policy Point 4J under Transport Requirements, it is not clear why this policy wording is different from the wording in S7, S8 and S9. This leaves this policy with no real reference to the Enabling Travel Choice Strategy. Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the Local Plan is adequate to facilitate and guide appropriate consideration through the planning process.
Policy S12: Land South of Whetstone - Strategic Development Site	Regarding Paragraph 8, under Transport Infrastructure, it is not clear why this policy wording is different from the wording in S7, S8 and S9. This leaves this policy with no real reference to the Enabling Travel Choice Strategy. Regarding Paragraph 10, the existing wording could be misinterpreted to be focussed on addressing fluvial flood risk 'within the site'. The proposed amendment makes clear the focus should be on providing downstream betterment. As above, this focus is in accordance with the NPPF requirement for development to 'where possible...reduce flood risk overall'. Existing wording: <i>10. The development will be required to deliver a drainage and water management strategy to address areas of fluvial flood risk associated with the Whetstone Brook and surface water flows within the site. A sustainable drainage system based on natural flood management principles in accordance with Policy CC2 Flood Risk is required. No built development outside of Flood Zone 1.</i> Requested amended wording: <i>10. The development will be required to deliver a drainage and water management strategy that reduces fluvial flood risk downstream associated with the Whetstone Brook and mitigates surface water flood risk within the site. A sustainable drainage system based on natural flood management principles in accordance with Policy CC2 Flood Risk is required. No built development outside of Flood Zone 1.</i>

Policy S13: Strategy for Retail and Leisure and Network of Centres	No comments
Policy S14: Strategy for Gypsies and Travellers and Travelling Show Persons	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. The HIA made particular recommendations to strengthen policy wording from a health perspective. Recommendations that have not been taken forward but Public Health would welcome the inclusion of are: • Strengthen consideration of cumulative environmental impacts, particularly noise, air quality and traffic, where sites are located near major roads or infrastructure, to ensure satisfactory living conditions are maintained over time The same principles for site allocation for housing sites apply, and therefore a further criterion should be added on the need to avoid the sterilisation of mineral in line with LMWLP Policy M11 and also another on the need to for not introducing sensitive uses adjacent to operational safeguarded waste sites in line with LMWLP Policy W9. Also, seems to need rewording as doesn't quite make sense: <i>'Restricting development within Green Wedges and Areas of Separation. Gypsy and Traveller accommodation as it is likely to be contrary to Policy S16 and Policy S17.'</i>
Policy S15: Design and Place-making	We welcome the policy and note the 'agent of change' principles which should help safeguard existing minerals and waste sites.
Policy S16: Green Wedges (Strategic)	We welcome the recognition that minerals extraction could be acceptable in Green Wedges. Could certain waste development (open windrow or farm scale AD for example) also be acceptable, subject to not being harmful and other exceptions?
Policy S17: Areas of Separation	The policy is welcomed, however the suggestion is then made to the potential of new settlements being reliant of provision within existing settlements for community cohesion/establishment.
Policy S18: Countryside	No comments
Chapter 4: Climate Change and Flooding	
Policy CC1: Planning for Climate Change	Policy Point 2A: This requirement could be enhanced by specifying a preference or hierarchy for green SuDS and not grey SuDS such as permeable paving. This would assist in ensuring compliance with B which rightly requires 'multi-functional green and blue infrastructure' by ensuring that SuDS for drainage are also valuable green/blue amenity spaces. Green SuDS in place of permeable paving could also minimise the urban heat island effect. Policy Point 2D: There is little value to this requirement given that it is Building Regulations. It is recommended to enforce a stricter standard such as 95 litres/person/day.

	Furthermore, there is no mention of measures required to prevent internal overheating of new homes. This needs to be rectified. A new point should be added to (2) to ensure developers are specifying measures to prevent unwanted solar gain (rather than relying on openable windows) such as external shading or orientation. Building Regulations Part O is unlikely to be sufficient to prevent overheating during heatwaves in itself.
Policy CC2: Flood Risk	It is noted that Paragraph 6 relates to easements on development close to Main Rivers (Environment Agency regulated). Please can Blaby DC consider adding a line to this policy in relation to ordinary watercourses as highlighted below. Whilst the Lead Local Flood Authority has guidance on easements on ordinary watercourses, it is not set in any policy and can be difficult to enforce due to weak national policy. There has been a recent instance of development in Blaby which has severely encroached on an ordinary watercourse, having a negative impact on flood risk and ecology. <i>6. Where development is proposed close to or adjoining a Main River an 8m easement will be required to be kept from the top of the bank. For proposed development close to an ordinary watercourse, an easement of 4.5m is required (or a 3m easement if the channel width is less than 2m) to be kept from the top of the bank. This is necessary to ensure that an appropriate buffer is provided to enable access for maintenance and during a flood event, and to make space for water as well as protect and enhance wildlife habitat adjacent to watercourses.</i> Additionally, the LLFA would like to see a strengthening of wording for the two strategic development sites on the Whetstone Brook catchment. Whetstone has suffered devastating flooding over the past 2 years and it is essential that new development upstream of Whetstone contribute to the reduction in flood risk downstream as required by the NPPF. The policy would also benefit from the specification of rainfall events for which compliance should be demonstrated to give developers something more solid to respond to, e.g. 1 in 100 or 1 in 1,000 year events. The policy should also specify that development should not lead to increased flood risk within the development area, locally outside of the development area or downstream within the catchment. To aid in this, it is suggested that the policy could seek to minimise the area of hard standing specified by ensuring that the minimum area required to meet homeowners' needs is paved or covered with impermeable services. Others areas should be permeable and ideally multi-functional.
Policy CC3: Water Quality, Supply and Wastewater	We welcome the policy and the recognition of the importance of providing for both water and wastewater in a coordinated fashion, however as per Policy CC2, consideration should be given to specifying a stricter water consumption standard such as

	95 litres per person per day. Consider also incentivising grey water collection facilities for non-potable uses and the requirement for water butts for rainwater collection.
Policy CC4: Renewable and Low Carbon Energy	No comments
Chapter 5: Conserving and Enhancing the Natural and Historic Environment	
Policy ENV1: Biodiversity and Geodiversity	No comments
Policy ENV2: Green and Blue Infrastructure	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. The HIA made particular recommendations to strengthen policy wording from a health perspective. We note the tightening of Policy E (paragraph 4) wording to better reflect how the built environment can actively encourage healthy behaviours, such as walking and cycling, but would still recommend the additional text: <i>'including everyday journeys like walking to school and convenience shops'</i> Other recommendations that have not been taken forward but Public Health would welcome the inclusion of are: • Strengthen protection of existing green and blue infrastructure, with clearer policy emphasis on retention and enhancement rather than replacement, recognising their established health and wellbeing value. • Reinforce the importance of accessibility to green and blue spaces, explicitly linking access to positive health and wellbeing outcomes for all. • Enhance the Policy E checklist by integrating Health Impact Assessment principles. Public Health and Active Together could support the development and future iterations of the checklist. • Address gaps in the checklist, including explicit consideration of community needs and aspirations, signage, and the quality and inclusivity of access, particularly for people with disabilities. • Broaden the supporting text (paragraph 5.6) to reflect a whole-life-course approach, ensuring benefits for children, working-age adults, and older people, alongside recognition of the voluntary and community sector • Strengthen mitigation expectations where green and blue infrastructure is lost, requiring contributions to improve both new and existing spaces, including the quality, safety, and accessibility of rights of way and path networks. • Reference the LCC Value of Trees Strategy to ensure that new planting delivers appropriate species in the right locations, maximising climate resilience, health benefits, and long-term sustainability. • Reference the Joint Health and Wellbeing Strategy 2022-2032 (recommended by both Public Health and Town and County planning Association (TCPA))

Policy ENV3: Trees and Hedgerows	It is considered that a helpful addition would be a sentence or extra point that requires developers to fund or supply aftercare of newly planted hedgerows, trees and other vegetation, including the replacement of specimens that die during establishment.
Policy ENV4: Landscape and Settlement Character	The text around protecting rural characteristics is welcomed.
Policy ENV5: Heritage and Culture	It is suggested that reference should be made to using Local Area Coordinators and cultural services to deliver inclusive engagement that integrates new and existing communities, strengthens social cohesion, and supports participation in the design and use of local places/buildings. At paragraphs 5.33 & 5.34, it is welcomed that the mention that Neighbourhood Plans might have additional identified heritage assets which should be taken in consideration. It is assumed that separate number points identify discrete policy components. However, point 2 ends with a colon, followed by a sub-title and then begins a new point 3 followed by (3) A-D. 3/3A-D should be read as part of 2. 4 Begins a new point, with 5-7 as sub-components of 4. It is recommended that for clarity that 3 is renumbered 2.1. 4 should be renumbered 3, with 5-7 renumber 3.1, 3.2. and 3.3. The policy identifies designated heritage assets as including Listed Buildings, Scheduled Monuments and Conservation Areas, the NPPF Annex 2 includes Registered Parks and Garden and Battlefields as well as World Heritage Sites, also Protected Wreck sites). Currently there are no RPGs, RBs or WHS in BDC, which is assumed as the reason for their exclusion, it is however, recommended that the policy references the wider NPPF definition. It might also note that not all assets of an equivalent significance to designated asset have been so designated, Non-designated heritage assets of an equivalent significance should be treated as designated assets (NPPF note 75). In the supporting text at paragraph 5.33 Re list of Designated heritage assets see above. Further within paragraph 5.33, Remove reference 'or Historic England via the Heritage Gateway', the Heritage Gateway is neither intended for a development management purpose nor supported adequately to deliver the information for the purpose described. The NPPF para 207 directs the LPA and developers to the principal source of data maintained for this purpose is the Historic Environment Record referenced in full below (5.35).
Policy ENV6: Minerals Safeguarding Areas	Welcome inclusion of this policy. Including reference in the wording to both the Leicestershire Minerals and Waste Local Plan policy or successor policies would be prudent. Whilst a new M&WLP has not formally started yet, there are publicly available documents which outline that it will (not to mention, Government require us to start one).

Chapter 6: Housing	Chapter makes no mention of Neighbourhood Plan sites and whether any collaboration has taken place with Neighbourhood Plan Groups. If there is, this should be referenced similar to Policy H1C.
Policy H1A: Land Rear of County Hall, Glenfield	No comments
Policy H1B: Land at Kingstand Farm and Golf Course, Leicester Forest East	Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process.
Policy H1C: Land off Lutterworth Road, Blaby	Paragraph 6.19: Welcome the inclusion of identified site with Blaby Neighbourhood Plan to demonstrate the importance of sites allocated within Neighbourhood Plans as well as those within the Local Plan.
Policy H1D: Land at Keepers Farm, Lutterworth Road, Blaby	No comments
Policy H1E: Land East of Lutterworth Road, Blaby	Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process. <u>Comments from an LCC Landowner Perspective</u> See earlier comment under Policy S4.
Policy H1F: Land South of Maurice Drive and Gillam Butts, Countesthorpe	No comments
Policy H1G: Land West of Peatling Road, Countesthorpe	Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process.
Policy H1H: Land West of Broughton Road, Cosby	No mention in policy or supporting text of Minerals Safeguarding Areas.

Policy H1I: Land South of Narborough Road, Huncote	Previously flagged that it appears that the site is within Minerals Safeguarding Areas for Sand & Gravel and Igneous rock. Any allocation and future applications would need to be informed by/ accompanied by an assessment of the potential mineral resource adjacent and within the allocation in line with the LMWLP Policy M11. Appears to adjoin Croft Quarry, so needs to be in line with Policy M11 and M12. Site is more distant from waste sites and separated by the village but should also have regard to safeguarded waste sites and Policy W9. Acresford Sand & Gravel (B10, safeguarded in Document S1/2015). Greens Lodge Farm (B9, safeguarded in document Document S1/2015) is more distant to the northeast. Note that the supporting text simply says <i>'Pollutants and contaminants arising from previous uses of land and the proximity of Croft quarry will be considered through the application'</i> . And that an active aggregates quarry is located approximately 150 metres to the south.
Policy H1J: Land at Springfield Farm, Forest Road, Huncote	Previously flagged as in a Minerals Safeguarding Area and also with waste safeguarding issues. The policy text contains the following <i>'10. Consideration of land contamination impacts and mitigation relating to the site's proximity to a historic landfill site; and 11. Consideration of odour impacts and mitigation related to the anaerobic digestion plant located to the north of the site'</i>. Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process.
Policy H1K: Land South of Warwick Road, Littlethorpe	No mention in policy or supporting text of Minerals Safeguarding Areas. Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process.
Policy H1L: Land South of Hinckley Road, Sapcote	No mention in policy or supporting text of Minerals Safeguarding Areas. Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process.
Policy H1M: Land West of Huncote Road, Stoney Stanton	Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and

	archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process.
Policy H1N: Land at Church Farm, Station Road, Elmesthorpe	Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process.
Policy H1O: Land at Steeple Chase Farm, Main Street, Kilby	No mention in policy or supporting text of Minerals Safeguarding Areas. Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process. <u>Comments from an LCC Landowner Perspective</u> See earlier comment under Policy S4.
Policy H1P: Land West of Coventry Road, Sharnford	No mention in policy or supporting text of Minerals Safeguarding Areas.
Policy H1Q: Land at Hill View Nurseries, Thurlaston	No comments
Policy H1R: Land off Croft Road, Thurlaston	No comments
Policy H2: Affordable Housing	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. The HIA made particular recommendations to strengthen policy wording from a health perspective. Recommendations that have not been taken forward but Public Health would welcome the inclusion of are: • Clarify space standards for affordable housing, confirming that national minimum space standards apply to both internal space and private or shared outdoor space, including minimum garden space provision. • Strengthen expectations around outdoor space and shade, and indoor sunlight, ensuring affordable homes have comparable access to gardens, surrounding green infrastructure and sunlight as market housing, to help reduce health inequalities linked to green space deprivation.

	• Where viability and flexibility is made on proposals of 100% affordable housing, the quality of build and surrounding area must still provide for high quality of life outcome. • Provide clearer definitions within the policy, particularly around what constitutes a “negative impact on a mixed community” and “exceptional and authenticated site development costs,” to support consistent interpretation. <u>Comments from an LCC Landowner Perspective</u> Overall, Policy H2 is supported and, in particular, the provisions within Para H2.1 and H2.3 which facilitate both an adjustment to the tenure mix and the level of provision on viability grounds noting that any adjustment should be agreed at the application stage. Further, the policy at H2.4 to H2.6 relating to rural exception sites is also supported especially the recognition that cross subsidisation by the provision of market housing is acceptable to secure the delivery of the affordable housing subject to at least half the dwellings provided being affordable.
Policy H3: Housing Mix and Density	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. Public Health welcome the inclusion of all recommendations made to this policy. <u>Comments from an LCC Landowner Perspective</u> Policy H3 reflects the evidence of the HENA and is therefore seen as realistic.
Policy H4: Specialist and Accessible Accommodation	Support the provision of accessible and adaptable homes that promote equality, including options for younger people with additional needs or requiring supported living, social rent requirements etc.
Policy H5: Self and Custom Build Housing	Policy H5, Point 4: Welcome the inclusion and encouragement for Neighbourhood Plans to identify suitable sites for custom builds in their area and the recognition that Neighbourhood Plans are a suitable mechanism for this best deciding where these could be located within their communities. <u>Comments from an LCC Landowner Perspective</u> Policy H5 aligns with local plan policies across the HMA and contains the safeguard to the developer enabling unsold plots to be developed as market housing in the event of no proven demand following a 12 month marketing period which is strongly supported.
Chapter 7: Health and Well-being	

Policy HW1: Healthy Communities	Public Health and Planning at Blaby have worked closely on the policy requirement of Health Impact Assessments alongside applications for some development. Final policy wording was sent May 2026. Overall Public Health are pleased to see the inclusion of policy recommendations, although note the removal of requiring a HIA on ‘<i>Development in areas of public health concern including areas vulnerable to worsening health inequalities (as indicated in the guidance notes on the Leicestershire County Council webpage)</i>.’ It is suggested the wording is included back in policy, as has been emailed directly to Blaby colleagues. Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. Public Health welcome the inclusion of all recommendations made to this policy. Recommendations that have not been taken forward but Public Health would welcome the inclusion of are: • Strengthen alignment with national policy Refine wording on hot food takeaways to match the NPPF, including clear expectations on proximity to schools, parks and youth destinations, and how cumulative impacts will be assessed. • Reinforce emphasis on inequalities and life-course needs Enhance references to addressing health inequalities and ensure open space and health-supporting infrastructure meet needs “across the life course.” • Include explicit strategic linkage Add a reference to the <i>Leicestershire Joint Health and Wellbeing Strategy 2022–2032</i> to support coherence with wider health priorities. It is further suggested that the use of Local Area Coordinators and cultural services could help to deliver inclusive engagement that integrates new and existing communities, strengthens social cohesion, and supports participation in the design and use of local places/buildings.
Policy HW2: Open Space, Sport, and Recreation	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. The HIA made particular recommendations to strengthen policy wording from a health perspective. Recommendations that have not been taken forward but Public Health would welcome the inclusion of are: • Strengthen reference to climate resilience in the design and location of open spaces, including provision of shade, shelter, sustainable drainage and year-round usability to respond to climate change and extreme weather. • Reference recognised quality standards, such as the Fields in Trust 2024 guidance, to support delivery of high-quality, inclusive and multifunctional open spaces, including sensory and inclusive equipment, natural play and flexible use. • Encourage alignment with Sport England’s Active Design principles, to strengthen the policy’s contribution to physical activity, movement and everyday active travel through well-designed environments.

	• Encourage greater consideration of safety in open spaces, including aspects such as street lighting, signage, seating, natural surveillance and legibility, to help spaces feel safe and welcoming throughout the day and year. • Strengthen the policy's emphasis on community use, drawing more clearly on the principles set out in paragraph 6 of the Open Space policy to support shared use, social value and wider community benefit. • Promote inclusive design approaches across open space and recreation provision and management, helping to ensure spaces are accessible, welcoming and usable for a wide range of users, including women and girls, older people, disabled people, neurodiverse people, people from different cultural backgrounds and diverse communities.
Policy HW3: Ground Conditions, Pollution and Health	No comments
Policy HW4: Air Quality	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. The HIA made particular recommendations to strengthen policy wording from a health perspective. Recommendations that have not been taken forward but Public Health would welcome the inclusion of are: • Strengthen policy wording on air quality protection, clarifying that development <i>must not</i> lead to a significant deterioration in air quality, reflecting the existence of legally binding air quality limits. Where this is not possible, consider re-ordering supporting text to ensure the strongest policy test is set out first. • Require explicit consideration of cumulative air quality impacts, particularly where multiple developments, traffic growth or major infrastructure are present, to avoid incremental harm over time. • Ensure air quality assessments consider disproportionate impacts on vulnerable groups, including children, older people, people with long-term health conditions and communities living near busy roads. • Clarify treatment of sensitive receptors, explicitly identifying homes, schools, care settings and traveller sites as high-sensitivity uses requiring a higher level of protection.
Policy HW5: Hazardous Sites and Installations	No comments
Chapter 8: Employment	
Policy E1A: Land to the North of Mill Lane, Glenfield	No comments
Policy E2: Key Employment Sites and Other Existing Employment Sites	No comments

Policy E3: Employment Development on Unallocated Sites	Text could do more to encourage developers to deliver social value outcomes, including creation of local employment and skills. opportunities. See - https://wmca.moderngov.co.uk/documents/s625/Appendix%204.pdf
Chapter 9: Retail, Leisure and Tourism	
Policy R1: Sequential Test and Impact Assessment	No comments
Policy R2: Blaby Town Centre, District and Local Centres	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. The HIA made particular recommendations to strengthen policy wording from a health perspective. Public Health welcome the inclusion of additional wording recognising design and value of urban greening and an attractive public realm.
Policy R3: Motorways Retail Area, Everards Meadows and Meridian Leisure	No comments
Policy R4: Neighbourhood Parades	No comments
Policy R5: Sustainable Tourism, Leisure and Visitor Development	Criterion F could helpfully cross-reference the Mineral Safeguarding Policy.
Chapter 10: Infrastructure and Transport	
Policy INF1: Developer Contributions	The supporting text to this policy reads: <i>“At this time the Council has not introduced a Community Infrastructure Levy and will continue to secure developer contributions through Section 106 agreements and, in the case of highways, Section 278 agreements to mitigate the impacts of development. Decisions will be taken in accordance with the legal tests set out in Regulation 122 (2) of the Community Infrastructure Levy Regulations 2010 (as amended) which states that a planning obligation must be</i> <i>• necessary to make the development acceptable in planning terms;</i> <i>• directly related to the development; and</i> <i>• fairly and reasonably related in scale and kind to the development.</i> <i>The Council will continue to keep under review the benefits of a Community Infrastructure Levy and where it decides to take forward CIL it will work with partners to deliver infrastructure such as schools or new strategic transport infrastructure to address the impacts of growth on existing communities.”</i>

	Given this, it is unclear how developer contributions towards transport interventions required to address the Plan spatial strategy's overall, cumulative impacts will be secured.
Policy INF2: Community Facilities	It is considered that the text could better promote inclusion of shared community meeting places/buildings where activities can take place and services can be delivered from.
Policy INF3: Burial Provision	It is queried whether paragraphs 10.25 – 10.31 under the heading 'Sustainable Transport' are incorrectly placed underneath Policy INF3: Burial Provision, and should instead form supporting text under Policy INF4.
Policy INF4: Sustainable Travel in New Developments	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. The HIA made particular recommendations to strengthen policy wording from a health perspective. Recommendations that have not been taken forward but Public Health would welcome the inclusion of are: • Make clearer reference that sustainable travel generally refers to non-motorised means of transport. Clarify if including electric vehicles as sustainable transport modes. Make clearer prioritisation of these methods of sustainable transport. Ensure all residents have equal access and choice of sustainable travel option. In particular, locate specialist housing and housing more likely to house vulnerable groups, such as bungalows accommodating older persons, closest to public transport hubs, bus stops and accessible routes on a site. • Refer in policy to appropriate storage and parking for sustainable travel options, including cycle parking and electric vehicle allocations. • Policy point 3 could be strengthened to add flexibility and openness to innovative transport approaches in rural areas. Understanding that opportunities in rural areas are restricted is important, however as worded could exclude innovative ideas and solutions to rural transport by developers and instead deliver only a consistent minimum requirement. • Strengthen policy through clearer prioritisation of sustainable travel would help articulate its positive role in improving affordability, ensuring equitable access, and health benefits. As per the comment in INF3, it is queried whether paragraphs 10.25 – 10.31 under the heading 'Sustainable Transport' are incorrectly placed underneath Policy INF3: Burial Provision, and should instead form supporting text under Policy INF4. It is considered that Paragraph 10.29 may be the 'transport strategy' that is referred to elsewhere in the Plan. But it is not clear and again not linked to demonstrating a response to current conditions on Blaby's transport system nor evidence of future conditions. The adopted Charnwood Local Plan 2021 to 2037 para's 9.17 to 9.29 and Policy INF2 provide an example of better clarity and relation to evidence. In paragraph 10.30, the wording reads "These measures taken together will enable higher levels of trip internalisation and modal shift than achieved in sites previously in Blaby District." However, it is considered that at present the Plan's evidence base does

	not provide any analysis of this bespoke to the place that is Blaby district. In the same paragraph, text reads “These expectations are a thread which runs through this plan.”, it is considered however that this is not clearly demonstrated.
Policy INF5: Active and Healthy Travel	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. The HIA made particular recommendations to strengthen policy wording from a health perspective. Recommendations that have not been taken forward but Public Health would welcome the inclusion of are: • Clarify expectations around sustainable locations, confirming that development is delivered in locations that are, or will be made, accessible and sustainable in practice both internally and externally of the site. • Strengthen reference to inclusive supporting infrastructure along active travel routes, including provision or access to permanent, well-managed seating/rest areas, shade and toilets. • Encourage early delivery of active travel routes, so walking, wheeling and cycling infrastructure is in place and usable from the earliest stages of development. • Improve alignment with national guidance by referencing the Active Travel England planning toolkit and recognising the role of Active Travel England as a statutory consultee on qualifying developments. • Reinforce support for healthy school travel, encouraging safe, direct and well-designed walking, wheeling and cycling routes that promote independent travel, physical activity and reduced car use for children and young people.
Policy INF6: Public Transport	Policy INF6 should be ‘Passenger Transport’, which is a wider and more embracing term than ‘Public Transport’.
Policy INF7: Highway Arrangements on Cross Boundary Sites	Regarding the policy text. “1) Where sites are cross boundary, or require cooperation between Blaby District Council and another adjoining Council to either deliver a site allocation in this Plan or a site allocation in an adopted adjoining Plan the Council will work collaboratively with neighbouring Local Planning Authorities and developers to ensure sites can come forward in a timely way.” This is welcomed in principle, but should also relate to the cross-boundary delivery of infrastructure and services required to enable site delivery.
Policy INF8: Parking and Highway Design Standards	No comments
Policy INF9: Lorry Parking Facilities	No comments
Policy INF10: A47 High Load Route	No comments

Policy INF11: Waste Management, Collection and Recycling	Policy is welcomed. Reference to circular economy could be referenced in policy text as well as the supporting text.
Chapter 11: Implementation and Monitoring	No comments

Further Comments (Appendices)	3. <u>Monitoring Framework</u> ENV5 • Amend (Bullet point 4): Number of non-designated heritage assets recorded on the Historic Environment Record – No target. Monitor. • Add (Bullet point 5): Proportion of a planning applications determined with archaeological/heritage conditions secured – No target. Monitor. 4. <u>Glossary of Terms</u> <i>Designated heritage assets</i> should either reflect the full definition as detailed in the NPPF Annex 2 (World Heritage Sites, Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens, Registered Battlefields), or the criteria indicated in the Culture and Heritage Chapter (SM, LB, CA). <i>Non-designated Heritage Assets</i> are other buildings, monuments, sites, places, areas or landscapes not meeting designation criteria but have been identified as having a degree of heritage significance by Blaby District Council. NDHA are identified through the development management process, the preparation of Neighbourhood Plans or Local Heritage Listing. The most up to date and complete record of non-designated heritage assets is maintain by the Leicestershire and Rutland Historic Environment Record.
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