

Appendix A**Leicestershire County Council Additional Officer Comments on Blaby District Council's New Local Plan Options Consultation****Other key thematic responses***Locational Strategy response*

1. The Council notes Blaby DC's recognition that the scale of housing growth to be planned for has an important influence on the locational strategy which shapes where new development.
2. The three scale of growth options tested are considered to be reasonable and appropriate; however, it is noted they do not include the 35% uplift in the standard method figure for Leicester, announced December 2020 nor the most recent 2018 based population and household projections. Through taking a holistic and joined up approach to planning for growth it will enable the County Council, Blaby DC and other partners to minimise financial risk.
3. It is crucial that the next stage of the Local Plan factors in decisions made in relation to the apportionment of the City's unmet need.
4. Given that this Local Plan is pivotal to the transition of L&L HMA wide housing spatial distribution from the former Regional Growth Plan's emphasis to one now driven by the Leicester and Leicestershire SGP, it is disappointing that there is no Strategic Objective relating to achieving this transition and what that entails. The Strategic Objectives relate in the main to district issues, with little consideration of the wider HMA considerations.
5. Furthermore, a new or expanded social strategic objective should be included which seeks new key infrastructure to come forward to support the delivery of housing to meet need within the district or wider L&L HMA. Currently the focus of the social objectives is on housing without crucial reference to the infrastructure essential to underpin the delivery of housing.
6. Also, given issues around the (recently much increased in scale) unmet housing need of the City of Leicester, the role that the Plan might have in meeting this should justify its own Strategic Objective.
7. Additionally, the Plan's objectives should be much stronger in respect of environmental issues in particular by making direct reference to needing to act on recent 'climate emergency' declarations and meet decarbonisation/ 'net zero' targets.
8. The spatial distribution/site options section of the document does not explore/ articulate the potential for key strategic site options within the district to form part of wider cross-boundary growth opportunities. This is particularly the case for Whetstone Pastures, where the cross-boundary element is potentially key to

give the site the critical mass needed to create a self-contained new settlement (as opposed to a dormitory settlement), but also the mass needed to justify additions required to the Strategic Road Network (for example, an M1 Junction 20a).

9. With regard to employment growth it is noted that an assessment of employment implications from the HNRFI proposal will be undertaken. If granted development consent this proposal will have a significant influence on the locational strategy for the district and the neighbouring borough of Hinckley and Bosworth. The County Council also require factors such as ensuring local communities are able to access jobs at the HNRFI (as the facility will require a ready supply of labour in relatively close proximity), being taken into account in the locational strategy. The impact of increases in vehicular movements to nearby existing and proposed communities will also need to be addressed.
10. Through the new Local Plan, a holistic approach should be taken to planning for the delivery of the SGP; dealing with housing and employment needs in silos will not assist with the efficient planning of infrastructure (transport, education etc) and service provision. By extension, the Local Plan should also explain the functional relationships Blaby District currently has, and is envisaged to have through the SGP, with the City of Leicester and neighbouring districts.
11. The County Council supports the move towards the SGP strategy as it is recognised that it should remove development pressure from existing communities close to the PUA. The SGP strategy seeks to shift growth towards strategic sites where Garden Communities can be developed embracing walkable, health and well-being and environmental aspirations. This approach does not come without risk as new strategic infrastructure will be required and consequently the County Council in continuing close collaborative working with Blaby DC and other partners will look to minimise risk by ensuring where possible external funding from Government and its agencies is secured as well as S106 planning obligations from developers.
12. There appears to be no alignment of the proposed settlement hierarchy with the SGP (A46) Priority Growth Corridor (PGC). Reference to the Extended PUA, from a geographical relationship perspective is noted, but from an economic and wider functional perspective it could be 'misleading' as to the nature of the developments proposed in the PGC, for example seemingly conflicting with the concept that Garden Villages should largely be self-contained entities.
13. Whilst supporting the concept of the Extended PUA as part of the new settlement hierarchy, the County Council would prefer the settlements included to be limited to those that have an economic growth role on radial routes from the City, enabling ease of access to and from the City by public transport. This would focus on the A5460/B4114 out of the City to Enderby and Narborough which is also accessible by rail, and the A426 to Blaby and Whetstone; removing Countesthorpe from this tier of the hierarchy.

14. The County Council supports the locational strategy containing a number of elements to provide planned growth for existing and future communities; recognising the need for development to be delivered throughout the plan period and the long lead in time which strategic sites often entail due to their more complex nature. However; this does need to clearly reflect the SGP vision and provide a robust policy framework that deals with the cumulative impacts of growth across the District and also cross-boundary and provides for developer contributions towards addressing such cumulative impacts. In respect of strategic sites, this is likely to be particularly the case, including impacts on the Strategic Road Network, including the M1 and A46 corridors.

Design

15. The County Council supports the emphasis on urban design quality and place-making, as it recognises that design of places directly impacts on health and well-being, climate change, pollution, resource consumption and strength of bio-diversity. Design codes within masterplans for strategic and larger sites should be required to give an early indication of design aspirations and to enable design to be costed at the outset. Quality design will greatly help new development to more acceptable to existing communities.
16. The principle of achieving quality design is supported and the sentiments expressed in the proposed policy around layouts that invite people to walk and cycle, and in respect of accessibility to facilities and services are welcomed; this will help in the drive to decarbonise travel and to promote healthier lifestyles.
17. Quality should not just be about day one, but last throughout the lifetime of the development. Like many local highway authorities, Leicestershire County Council has insufficient funding available to it to maintain even the County's highest categories of roads, let alone residential estate roads. Thought therefore needs to be given in framing the policy in respect of how quality will be maintained in the long term (e.g. through the developer payment of commuted sums).
18. As hubs of communities, schools can help to transform markets, policy, education, and behaviour, increase community resilience, mitigate climate change, and prepare citizens to think and act in new and creative ways. Schools have an unparalleled importance to sustainable communities and are the social hub to the communities they serve, therefore thought needs to be given to where schools are located in developments / garden villages.
19. The County Council would welcome 'whole life' and 'whole community' development models with an emphasis on a strong commitment to being dementia friendly. The Council would like to see a commitment to the highest standards of dementia friendly town planning and property design particularly as there is transferability to other vulnerable adult populations.

Climate Change

20. There should be encouragement for avoidance and reduction of climate change not just emphasis on the need to mitigate and adapt. The adaptation to climate change may not be possible if we do not try to avoid and reduce the causes of climate change and biodiversity loss.
21. If there is to be a reliance in the emerging new Local Plan in the usage of passenger transport to help in respect of climate change/carbon reduction, then the Local Plan should also seek to focus the bulk of new development in large scale settlements or new strategic sites, well located to existing commercial bus corridors, and to rail corridor also. An approach that embodies the delivery of smaller scale developments scattered across a wide geographic area will be far more challenging to the establishment of commercial, long term sustainable passenger transport services.
22. The policy approach should also be more explicit on the need to consider infrastructure required to support decarbonisation of the transport system, most notably domestic and commercial electric vehicle charging facilities. Given the recent direction of industry and government policy, this is now an essential component that needs to be built in from the start.

Transport

23. The District Council's commitment to an evidenced-based approach for its Local Plan is welcomed as is its stated support for evidence gathering in Leicester and Leicestershire that considers the implications of strategic scale growth.
24. It is important to stress, however, that these two strands of evidence cannot be considered in isolation. Growth in the City of Leicester, in Charnwood, in Harborough and in Hinckley and Bosworth will have over-lapping impacts on the transport system in Blaby District (and the same is true of growth in Blaby impacting on those areas), potentially most acutely on the Strategic Road Network – SRN – (including the M1 and A46) but also in respect of the continuation of the Strategic Growth Plan (SGP) 'Priority Growth Corridor'. Such cross-boundary, cumulative transport impacts are very likely to have a material impact on the district's ability to grow in future, unless ways can be found to mitigate those impacts.
25. Whilst it is welcomed that the District Council has commissioned a study by Sustrans that seeks to examine the potential for new development in Blaby District to maximise the potential for walking and cycling, such linkages should not be considered in isolation either from the future development of Local Cycling and Walking Infrastructure Plans nor from the wider perspective of the 'Priority Growth Corridor'. The Health Impact Assessment can accompany the Cycling and Walking Strategy to add strength around evidence of need to developers.
26. Conditions on the Strategic Road Network, particularly on the M1 and A46, are such that they are likely to have a material impact on the district's ability to grow in the future, unless appropriately addressed (even before existing conditions

are compounded by cumulative cross-boundary impacts of growth in the City of Leicester, Charnwood and Hinckley and Bosworth).

27. With regard to cycling and walking, in summer 2020 Government made a dramatic shift in policy on cycling in particular and the emerging new Local Plan should reflect this.
28. The Local Plan should include a policy that builds electric vehicle charging infrastructure etc into new properties where this does not impede the safe and effective functioning of the highway.
29. Public transport links are very important to vulnerable adult populations as driving for many is not an option. The commitment to walk ways and cycle routes to town centre facilities is encouraged.
30. It is noted that in Appendix A entitled 'Summary of Site Assessments' the list of sites that are considered "reasonable" includes a small number of sites on which the Local Highway / Transport Authority, has not commented on previously (through the Strategic Housing and Economic Land Availability Assessment (SHELAA) or other processes). It is also noted that the list includes various sites on which the County Council has previously raised significant in-principle highways/transport concerns. These may, or may not, prove to be resolvable on further investigation. In relation to these sites, the County Council would welcome further discussions to explore key transport issues in more detail before any decision is taken on their inclusion in any transport assessments or selection as draft site allocations within the emerging new Local Plan.

Education

31. Details are provided in the appendix (in response to Q31) of specific school sites and their ability or inability to expand. This information is for primary and secondary schools, and reference is also made to the formula for Early Learning Provision. It is provided to inform consideration by Blaby DC, the County Council and other partners of future spatial distributions of growth and connectivity to other areas for communities in Blaby District such as access to secondary school provision in Hinckley and Bosworth Borough.

Flood risk

32. There should be consideration of the cumulative impact of flood risk issues and these issues also need to be considered in the context of the wider area beyond the district.
33. While the approach is sound, there is concern with specific sites where they are within a catchment upstream of an existing flood risk area. Extra mitigation beyond the requirements of national policy may be required in these instances.

Biodiversity

34. Whilst the Biodiversity section of the Options document is acceptable, it is not considered to go far enough.
35. As part of the County Council's Local Nature Recovery Strategy, opportunities for biodiversity recovery by improving climate change resilience and addressing habitat fragmentation through creation of a linked and connected ecological network need to be identified, which will include areas that have no intrinsic current value.

Heritage Assets

36. In identifying assets worthy of protection for heritage reasons, it is essential to recognise that the known resource represents only those assets that have as yet been identified, and in some cases designated (listed, scheduled, etc). It does not reflect the entirety of the resource. It is also important to recognise that our current understanding of the character and significance of the resource will evolve over time as more information comes to light. Consequently, policies proposed should allow for both the protection and enhancement of both known and as yet unrecorded heritage assets, their setting and context.
37. Blaby District has a number of heritage assets of value to the local community, as well as tourists, that all help to add to the district's distinctiveness; for example the Victorian Ice House and the buildings in the Cosby Conservation area (the Tithe Barn and Parish Church). As well as preserving the structures, it is important to provide some local interpretation to ensure they are valued and visible (heritage trails, site based interpretation boards etc).

Healthy Communities

38. Health Impact Assessments are considered to be an effective tool together with ongoing engagement at a strategic level and on a site level. The County Council supports the continued engagement of Public Health and Leicestershire and Rutland Sport (LRS) to inform the creation of new communities through effective Local Plan policies relating to health.
39. The Local Plan can make a holistic impact on health and wellbeing for its residents and visitors to the area, addressing many of the wider determinants of health. The Options document already covers a wide range of health-related areas and it is positive to see such a focus on health and links to so many health-related stakeholders and partners.
40. The Plan should contain policies that locate development in places that are already well served by suitable walking and cycling networks or that are realistically capable of being made so. In the Summer of 2020 Government made a significant shift in its overall policy towards cycling. There is now a strong emphasis on cyclists being treated as equals with motorists and on their segregation from pedestrians. It is to be expected that Local Plan policies should reflect this significant shift in Government policy, both in respect of the master-planning and design of development layouts, but also in respect of securing developer contributions.

Green Infrastructure and Space

41. Green infrastructure is crucially important for existing and new communities and has been highlighted during the Covid-19 pandemic. It is suggested a further environmental objective specifically on the provision of green infrastructure is included.
42. Work around protecting and creating open spaces is welcomed, particularly in the present situation with increased interest and demand in access to these facilities. There are opportunities, with enough access in the right places, to create a legacy which has links to improved physical and mental health.
43. The suggested devolution for local Green Spaces to Neighbourhood Plans is noted and generally welcomed. However; there needs to be scope for a strong link to be made with local green spaces and the identification of future strategic green space, an important component of future allocations and wider place making. Any local designation should complement any strategic open space and green infrastructure policies. The County Council would not wish for a disconnect between the two to occur.
44. It will be important to ensure that the designation of Local Green Spaces through Neighbourhood Plans is not seen as a potential opportunity to frustrate the delivery of strategic transport (or other) infrastructure required to support the Local Plan's and SGP's delivery. It will be important that such strategic infrastructure requirements are identified during the development of the Local Plan and robust policies are included in it to protect their delivery, alignments etc.
45. The County Council supports continued joint work on Strategic Green Space such as the review of Green Wedges.
46. The inclusion of allotments would be very much welcomed as it brings communities together, provides access to green space and horticulture is celebrated for its benefits to health and wellbeing.

Affordable housing

47. In undertaking the proposed Local Plan viability assessment to ensure the affordable housing policy is viable, it will be important for Blaby DC to ensure that it has as complete an understanding as is proportionate and possible about the potential costs of enabling growth across its area.

Older persons and specialist housing

48. The County Council encourages and will commit to a partnership approach to the identification of need/demand for specialist housing requirements for older people and adult populations with vulnerabilities.

49. There are vulnerable populations whose numbers do not indicate the need for each district council to develop its own response i.e Transforming Care. It would be beneficial for the district councils to commit to collaborate on meeting the housing needs of these populations.
50. A specific commitment to specialist housing offers to older people and vulnerable adults i.e. Extra Care Housing schemes, bungalows including wheelchair accessible developments, small developments of single person flats including wheelchair accessibility which could be aimed at supported living is to be promoted. It is recognised bungalows are land inefficient; however, they do offer 'life time home' opportunities.
51. Extra Care Housing and Supported Living would benefit from being located within walking distance of facilities such as leisure, health, retail and employment. Locating specialist developments within walking distance of green space and leisure would be welcomed as the benefits this has on physical, mental health and wider population wellbeing are considerable.

Employment land and premises

52. As previously noted, given that this emerging new Local Plan is pivotal to the transition of L&L HMA wide housing spatial distribution to one now driven by the Leicester and Leicestershire SGP, employment land provision should be considered in that context (regardless of whether it is to meet solely the district's needs or to meet wider HMA needs).
53. There should be acknowledgement that the COVID-19 pandemic has led to uncertainty and change and the full effects of the pandemic have yet to be realised. There is a big emphasis on strategic warehousing with little mention of office space, for example at Grove Park. The shift to home working may remain in the longer term and if that is the case and we are looking at sustainable living and working then there will be a need for smaller business parks and smaller units in existing locations. People working from home may require meeting room space which could be accommodated in new community buildings planned as part of a new development. Existing settlements could utilise libraries and village halls as community hubs rather than single purpose buildings as many are currently.
54. High skilled work considerations are welcomed especially considering space, engineering and sports science due to the Joint Strategic Needs Assessment/Growth Plan identification of skills being lost to outside of the county.

Retail, Leisure and Town Centre uses

55. The Covid-19 pandemic has significantly accelerated change in the retail sector and as a consequence core retail areas need to continue to be protected with the opportunity for leisure, employment and residential uses to occupy more

peripheral retail areas. Opportunities may arise for the re-use of retail buildings for click and collect hubs.

56. A section of the SGP 'Priority Growth Corridor' falls within the district. From a transport connectivity and infrastructure perspective, it will be important to understand the aspirations for levels of self-containment for the new communities planned in the Corridor. Notwithstanding the 'declining high street trend' and the impacts of the pandemic on that, those new communities are still likely to look outwards to some degree. Whilst the Local Highway / Transport Authority has no particular view on where that should be to, it will be important for it to understand whether this outward look is envisaged to be largely towards the centre of the City of Leicester or perhaps a more poly centric pattern will need to emerge in the light of the scale of HMA housing growth and its future distribution.
57. Regarding the Fosse Park area, it is noted ongoing developments in the Fosse Park/M1 J21 area are likely to further enhance its status as a major retail, leisure and employment destination. The area as a whole remains very 'car oriented' and conversely unappealing for walking and cycling. Tackling this issue could help to increase uptake of active modes of travel and unlock further economic potential for the area.

Tourism

58. The Local Plan should make reference to the Blaby Tourism Growth Plan (2019) which adopts a strategic approach to developing the visitor economy. Its actions align with the ambitions and strategic priorities of the county wide Tourism Growth Plan to maximise impact.
59. Green infrastructure sites and waterways support the visitor economy and should therefore be recognised within the plan.
60. The new leisure facilities at Everards Meadows brings new opportunities for integrating built leisure facilities and connecting to outdoor leisure pursuits, our natural assets and greater connectivity by sustainable forms of transport. This new leisure concept will hopefully pave the way for further innovative leisure attractions.

Strategic Property considerations

61. The purpose of the Strategic Growth Plan is to establish an overall strategic approach to inform the preparation of new Local Plans. The good physical and functional relationships of key settlements in Blaby District means that it is logical that a significant proportion of Blaby's overall housing needs, including an allowance for Leicester's unmet needs, is directed to the more sustainable locations in the district where through the delivery of infrastructure led, well designed, self-sustaining new strategic settlements can be located, such as that proposed on land to the west of Stoney Stanton. The proposed Strategic Site is well connected to the strategic transport network, accessible to

employment and capable of supporting the delivery of a full range of services and social benefits.

62. The County Council has interests in land at Countesthorpe, Blaby, Sapcote, Kilby and Croft. These offer sustainable opportunities to accommodate housing and employment development and should be included as allocations in the Local Plan. Comments, where necessary, on Blaby DC's Site Assessments are included in the appendix.
63. As a landowner, the County Council would be willing to consider the sub-division of sites where this would help to support small and medium housebuilders, subject to ensuring that this approach does not negatively affect deliverability of sites or the ability to achieve best value.
64. The issue of self-build can be more problematic. The Inspector for the Local Plan Part 2 specifically removed a requirement to provide 5% self-build on the proposed allocation north of Hinckley Road as it was not justified by available evidence, would not be viable and would have negative consequences for the provision of affordable housing. It is more likely that opportunities for self-build will be provided in relation to smaller sites of less than 10 dwellings and the plan should positively support self-build on these smaller sites.
65. Any policy to include self-build on larger sites should be subject to the proviso that only a small proportion (say 5%) is earmarked for custom/self-build with a mechanism for these units to be provided by the principal developer in the event that no demand is forthcoming for custom/self-build units within a limited period of say 12 months.
66. With regard to employment land, the County Council has interests in land at Glebe Farm, Lutterworth Road, Blaby (ref EBLA002) that has been identified in the Council's assessment as a reasonable development option. This assessment is supported and the site can provide for a suitable extension to the existing employment area in this location to accommodate the expansion needs of existing businesses and provide new employment opportunities.