

**Leicestershire County Council Officer Response to Blaby District Council's
New Local Plan Options Consultation (Regulation 18)**

<p>Q1. Do you think that the Strategic Objectives are suitable aims for the future of the District?</p>	<p>The Options Consultation sets out 15 strategic objectives covering social, environmental and economic themes. Objectives 1 and 3 refer to the aim to direct new growth to the most sustainable locations and to provide a suitable level of housing to meet overall need within the district and the wider Housing Market Area (HMA), and to provide a range of housing types, sizes and tenures to meet the needs of different groups. In terms of environmental objectives, Objective 4 refers to the support for a low carbon future and embedding considerations of climate change into the Plan. Objective 11 sets out the aim to provide an appropriate quantity, quality and mix of land for employment uses to support a diverse range of business needs, whilst Objective 14 seeks to prioritise the use of sustainable modes of transport and to plan strategically for transport and Objective 15 specifically references the need to support the sustainability of Blaby.</p> <p>The strategic objectives are broadly supported by the County Council as appropriate aims for the future of the District. In terms of overall housing needs within the district and wider HMA, it is important that the Council continues to work with the HMA authorities to agree an approach to the distribution of unmet needs from Leicester City. It is suggested that a new strategic objective (or expansion to objective 3) under social is formed to give prominence to new key infrastructure needing to come forward to support delivering housing to meet need within the district or the wider Housing Market Area, crucial to the delivery of housing and jobs and creating sustainable communities.</p> <p>Given that this Local Plan is pivotal to the transition of Housing Market Area (HMA) wide housing spatial distribution from the former Regional Growth Plan emphasis to one now driven by the Leicester and Leicestershire Strategic Growth Plan, it is surprising 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 real embracement of the wider HMA considerations.</p> <p>Also, given issues around the (recently much increased in scale) unmet housing need of the City of</p>
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	<p>Leicester, the role that the Plan might have in meeting this should justify its own Strategic Objective.</p> <p>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.</p> <p>(Whilst not a question specifically asked, presume that much of the content of the Plan will need to be revisited in terms of the increased scale of the City's unmet need?)</p> <p>The Strategic Objectives are suitable from an Education perspective whilst the social objectives fit with many of the aims of public health to improve health and reduce health inequality, along with environmental and economic considerations around air quality and safety. Objectives to provide training and job opportunities for current and future populations also fit within the wider determinants of health. These strategic objectives, if delivered well, provide potential for a healthy future for the District and its residents.</p>
<p>Q2. Do you consider that Blaby District meet only its own employment needs or contribute to meeting the needs of other areas in Leicester and Leicestershire?</p>	<p>Given that this Local Plan is pivotal to the transition of Housing Market Area (HMA) wide housing spatial distribution from the former Regional Growth Plan emphasis to one now driven by the Leicester and Leicestershire Strategic Growth Plan (SGP), it is surprising that the document makes little reference as to how this will be considered in planning for employment provision in the District. Through the new 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 or otherwise) 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.</p> <p>Paragraphs 4.1.1 to 4.2.7 deal with both housing and employment land needs. It is clearly relevant to consider both in the context of Leicester City's unmet need.</p> <p>In terms of housing need, reference is made to Leicester City Council's declared unmet need of some 7,800 dwellings and the uplift of 35% for the City required by the new standard method for local housing need; having the effect of lifting the unmet need figure to in excess of 18,000 dwellings. Paragraph 4.1.5 refers to three scales of growth tested in assessing alternative locational strategies. Table 1 of the Options</p>

	<p>Consultation sets out these scale of growth options, ranging from 339 dwellings a year from the standard method to 632 dwellings a year on a standard method with unmet need high growth option. As outlined above, it is important that the Council continues to work collaboratively with the HMA authorities to agree the distribution of any identified unmet need and to publish a Statement of Common Ground. It is critical for the progression of new Local Plans across the HMA that these figures are confirmed at the earliest opportunity.</p> <p>Paragraph 4.1.3 refers to the work on the Leicester and Leicestershire Strategic Growth Plan suggesting that a significant proportion of Leicester's unmet needs should be directed to Blaby. The purpose of the Strategic Growth Plan was 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 proportion of Leicester's unmet needs is directed to the more sustainable locations in the district. It is therefore considered that the Council should be planning for the higher levels of housing need to help meet Leicester's unmet needs.</p> <p>It is also important for the plan to build in sufficient flexibility to deal with changing circumstances. The Local Plans Expert Group report advised that to ensure a more effective supply of developable land for the medium to long term, plans should make provision for a mechanism for the release of developable reserve sites equivalent to 20% of their housing requirement.</p> <p>For employment development, if Blaby accommodates further housing growth, it is important that future employment development in the district matches this scale of growth to provide locally accessible employment opportunities that also accommodate wider strategic growth opportunities.</p>
<p>Q3. Do you agree with the proposed Settlement Hierarchy?</p>	<p>Given that this Local Plan is pivotal to the transition of Housing Market Area (HMA) wide housing spatial distribution from the former Regional Growth Plan emphasis to one now driven by the Leicester and Leicestershire Strategic Growth Plan, it is surprising that there appears to be no alignment of the proposed hierarchy with the Strategic Growth Plan (A46) Priority Growth Corridor (PGC). Reference to the 'Extended Principle Urban Area' is perhaps understandable from a geographical relationship perspective, 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.</p>

	<p>The classification of 'Medium Villages' is, again, understandable in the context of current circumstances. But, would that still be the case, say, in the case of Stoney Stanton and Sapcote in transitioning to delivery of the PGC. The document feels too static.</p> <p>From a transport infrastructure/service provision and connectivity perspective, the understanding of economic and wider relationships is critical from a planning point of view as is the understanding as to how the roles of settlements might transition throughout the lifetime of the Plan.</p> <p>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.</p> <p>A proposed settlement hierarchy is set out at Table 3 to the Options Consultation document. Compared with the adopted Core Strategy, this introduces a new tier – the Extended Principal Urban Area covering Blaby, Countesthorpe, Enderby, Narborough and Whetstone, with Medium Villages identified as Stoney Stanton, Cosby, Croft, Huncote, Littlethorpe and Sapcote. This represents a more simplified and appropriate settlement hierarchy than that set out in the Core Strategy.</p> <p>Within Blaby there are a number of settlements, both well connected to Leicester or more free-standing which are sustainable locations capable of supporting further growth. The inclusion of an Extended Principal Urban Area category recognises that the larger settlements such as Blaby are as well related to the Leicester Urban Area as the previously defined Principal Urban Area. The identified Medium Central Villages offer a good range of services and facilities, and, for Stoney Stanton, Croft and Sapcote, their proximity to the urban centre of Hinckley provides further sustainability benefits.</p>
<p>Q4. Do you consider that the Locational Strategy should</p>	<p>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. The inclusion of Strategic Sites within the Locational Strategy is strongly supported being</p>

<p>include Strategic Sites where there are higher levels of growth?</p>	<p>aligned with both the Strategic Growth Plan and the Blaby District Growth Plan.</p> <p>The need for a mix of scales of sites is acknowledged, not least because as the document acknowledges strategic sites can take some considerable time to initiate actual growth on the ground; from an infrastructure (transport or otherwise) and service provision it is far more preferable to have a pro-actively 'planned-for' and 'planned' approach to development to allow for pre-strategic site initiation, as opposed to ad-hoc 'unplanned' growth to fill the vacuum.</p> <p>Having said that, whatever the scale of site, the Local Plan needs to 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.</p> <p>The purpose of the Strategic Growth Plan was 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, 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.</p> <p>In considering the locational strategy in the Options document, in particular the identified four strategic site options and the strategic and local infrastructure likely to be required, the County Council is of the view that a project group approach is put in place at a senior level for all partners (including Highways England) to explore and advise on how the evolution of the locational strategy, covering critical dependencies for infrastructure delivery, suitable settlement thresholds, phasing requirements, funding, S106 planning obligations etc. This is due to the higher scale of growth likely to be required, the key strategic infrastructure indicated in the SGP in this area (part of the A46 Priority Growth Corridor, proposed M1 J20A), the major gateway into Leicester at J21 of the M1, access at J21A of the M1, and the strong functional connectivity with Leicester and settlements in Hinckley and Bosworth Borough and Harborough District.</p>
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<p>Q5. Do you consider that a range of smaller and medium sites located across a settlement hierarchy will also be needed to ensure the delivery of the total housing requirement?</p>	<p><i>See also Response to Question 4.</i></p> <p>Paragraph 4.3.15 of the Options consultation document advises that in order to plan for higher housing numbers, the location strategy should consider including strategic sites, smaller and medium sites in the Principal Urban Area settlements, extended Principal Urban Area settlements and Medium villages, with limited growth at Smaller Villages and Hamlets.</p> <p>As above, 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.</p> <p>Whilst strategic sites are a logical component of a strategy to deliver higher housing numbers, it is important that a range of sizes of sites in a range of locations are also provided to ensure delivery of housing in the early part of the plan period and to provide flexibility in the plan to deal with changing circumstances. Experience across the Leicestershire HMA is that lead-in times for larger strategic sites are inevitably lengthy and somewhat unpredictable and as a result can lead to problems for housing land supply unless a range of sites is provided and flexibility is built in to a plan's strategy. It is also important to allow for smaller scale opportunities in the smaller settlements to support their continued sustainability.</p> <p>Leicestershire 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 considered for inclusion as allocations in the Local Plan. Comment, where necessary, on the Council's Site Assessments is made below.</p>

<p>Q6: How should we diversify the housing market in the District to meet the requirement to provide more housing on smaller sites (less than one hectare in size)?</p>	<p>Further to the response in Q5, in terms of smaller sites, it has usually been the approach for local authorities to include a windfall allowance for smaller sites and not to allocate sites of less than 10 dwellings. In order to ensure the provision of smaller sites to meet the NPPF requirement, the Plan should look to specifically allocate smaller sites to give some certainty on their delivery.</p> <p>The impacts of larger numbers of smaller scale sites scattered across a wider geographic area can be difficult to provide for from an infrastructure (transport or otherwise) and service provision perspective. If the Plan is going to be predicated, even if in part, on such an approach, then this will need to be underpinned by 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. Additionally, such an approach is also likely to rely more heavily on public sector (district/borough, county, national government) coordination and delivery of the required transport and other infrastructure.</p> <p>There should be reference to Neighbourhood Planning as a means of identifying sites that are acceptable.</p> <p>The County Council would support the subdivision of larger sites if strong, clear, agreed robust masterplans are in place. This would ensure that smaller parcels of land on larger sites come forward and financially contribute towards infrastructure in a proportionate way.</p>
<p>Q7: If you have promoted a site for development and it is considered a reasonable option in the Council's site assessment work, would you consider subdividing the site to allow small and medium house-</p>	<p>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.</p> <p>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.</p> <p>Any policy to include self-build on larger sites should be subject to the proviso that only a small proportion</p>

<p>builders or selfbuilders to enter the housing market?</p>	<p>(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.</p>
<p>Q8. What do you think about the proposed policy approach to urban design quality and place-making?</p>	<p>The County Council support 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.</p> <p>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.</p> <p>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.</p> <p>But, quality should not just be about day one, but last throughout the lifetime of the development. In preparing the final version of the policy, the District Council should understand that 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).</p> <p>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 made on where schools are placed in developments / garden villages.</p> <p>Good design is crucial to health and wellbeing, this being identified is positive. The statement "Residential developments shall be considered against the Building for a Healthy Life considerations; with the considerations used to structure preapplication discussions" is particularly welcomed as is considerations of place attachment rather than just being active (which in itself is still important). Being active and air</p>

	<p>pollution are mentioned, we wonder if there is anything about design quality improving actual and perceived safety to improve health and wellbeing?</p> <p>Worth noting somewhere that <i>where practical</i>, opportunity to retain existing features should be considered; protected and incorporated into the layout of the site. Also, the subsequent maintenance and management of developments including public open spaces/ hard and soft materials needs to be factored in. This section should reference the opportunity mapping produced in the GI & Landscape Sensitivity Study produced for the Strategic Growth Plan.</p> <p>There is agreement that opportunities to create habitat but existing habitats should be protected such as veteran trees, mature hedges, species rich grassland and semi-natural grassland, wetland. The demarcation of public and private space should not compromise ecological connectivity for species and habitats.</p> <p>From a waste perspective, there is a strong policy approach drawn from multiple sources. We would strongly suggest aspects such as sustainable construction and energy efficient design are carried forward and incorporated.</p> <p>The policy approach to these areas needs to conform with the NPPF and relevant topic specific national guidance.</p>
<p>Q9. What do you think about the proposed policy approach to mitigating and adapting to climate change?</p>	<p>There should be encouragement for avoidance and reduction of climate change not just emphasise on the need to mitigate and adapt. The adaption to climate change may not be possible if we do not try to avoid and reduce the causes of climate change and biodiversity loss.</p> <p>Local authority budgets for providing support to non-commercial passenger transport services were under significant pressures even pre-pandemic – as was the case in Leicestershire – and the pandemic has had profound impact on passenger transport usage impacting on what had hitherto been commercially operated services. It is too early to say what the prognoses for the passenger transport network in Leicestershire might be even in the medium term.</p> <p>In this regard, if there is to be a reliance on the Plan in the usage of passenger transport to help in respect</p>

	<p>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.</p> <p>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.</p> <p>Strongly suggest that this policy incorporates the requirement for adequate space for appropriate recycling provision. We would strongly suggest this reflects both on-street recycling provision and recycling provision concerning dwellings or businesses as appropriate. Recycling is an important factor in mitigating the effects of climate change.</p> <p>Regarding 6.1.1 “<i>Locating and design of development to minimise flood risk</i>”, we would welcome mention of the creative use of water and SUDs also “<i>Incorporate green infrastructure and biodiversity into the development</i>” – should refer to biodiversity net gain (its mentioned in 4.6.3)</p>
<p>Q10. What do you think about the proposed policy approach to flood risk?</p>	<p>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.</p> <p>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.</p> <p>Sites such as these need to be fully assessed within the proposed Level 2 SFRA and specific policy/guidance considered to ensure development will not exacerbate existing flood risk. Furthermore, the district should consider how development of such sites may offer opportunities to provide betterment to the downstream catchments.</p>

	<p>Concerns that the planting of woodland should be balanced to ensure that mosaic habitats are retained and other habitats that have the opportunity to retain water and enhance the habitat and species diversity of Leicestershire such as Heathland, Grassland and wetland.</p> <p>Plans should take into consideration LCC emerging Strategic Approach to Biodiversity and the policy approach to these areas needs to conform with the NPPF and relevant topic specific national guidance.</p>
<p>Q11. What do you think about the proposed policy approach to biodiversity and geodiversity?</p>	<p>Whilst the Biodiversity section of the New Local Plan Options paper is acceptable, it is not considered to go far enough. Reference to biodiversity net-gain, a biodiversity study and the need to work with partners, etc is partly in accordance with the County Council’s recommendation in 2019 to the Issues and Options consultation which was: “Natural Environment Option B, which entails mapping all components of local wildlife-rich and wider ecological networks, is supported. Key natural assets and the wildlife corridors between them need to be understood so that opportunities to enhance the natural environment and create new links can be taken in the strategic master planning of growth.”.</p> <p>As part of our Local Nature Recovery Strategy, we need to identify opportunities for biodiversity recovery by improving climate change resilience and addressing habitat fragmentation through creation of a linked and connected ecological network – i.e. not just to identify existing assets but also places where recovery can be targeted through habitat creation, re-wilding and conservation management, etc – which will include areas that have no intrinsic current value.</p> <p>Biodiversity opportunity mapping and local nature recovery strategy would address the strategic biodiversity needs, but we need also to ensure that none of the allocated sites has significant biodiversity value – as we also need to conserve existing assets as these will be the key parts of the biodiversity network. The hierarchic principle of Avoidance-Mitigation-Compensation still needs to be adhered to; in the first instance, sites of existing value should be protected and development should avoid impacts to them; if this isn’t possible, mitigation is needed, and only as a last resort should compensation of offsetting of impacts takes place. The Biodiversity net-gain principles are not a charter that allows us to leap straight towards compensation for loss.</p> <p>Assessment of biodiversity impacts on each allocation can’t be done as a desk exercise. The Scoping Report Sustainability Appraisal (AECOM 2019) is very brief as regards biodiversity, and appears to be</p>

purely a desk exercise - although it is noted that there is no mention of my SH/EDLAA comments in this document. We do not have comprehensive ecological information across the whole area, and the Sustainability Appraisal is based on partial information that is not up to date. Field habitat survey of at least some of the sites is needed. This tends to be all sites that are not clearly on arable land or improved grasslands. In many instances sites require further surveys before making decisions. It is risky to allocate sites without this information; Blaby should be commissioning field surveys of the sites.

Agree with the need for a County wide policy that each District can deliver on at a local level. This would be strongly linked or integral to a Nature Recovery strategy in rural areas as well as the areas considered in the SCHLAA. Concern that the Biodiversity policy is weighted to other sectors such as construction (house building and economic sites such as those centred around logistics). Emerging LEP Natural Capital Evidence base to be considered. Agreement on the type of evidence to be used is required by internal and external stakeholders before this study can commence. How will Biodiversity Net gain be achieved off-site where on site avoidance, mitigation and compensation cannot be met? Acceptance of development on poorer soils could prevent the farming sector from taking advantage of Nature Recovery opportunities. Many areas of Semi-natural grassland are in areas of higher land value and sites where development is proposed. Ecological Network and Permeability mapping data to be considered in planning.

Need to maintain a linear corridors, stepping stones and buffer zones around core sites biological sites.

Consideration of brownfield sites in the interests of providing open mosaic habitat for a wide range of specialist species (e.g. invertebrates). This could be combined with a community space for nature, health & well-being (e.g. walked trails, forest schools, cycling etc). These sites are also important to the landscape character of an area and local heritage and should be given consideration for biodiversity. Brownfield sites are not always afforded the best protection when they can have some unique flora and fauna & are key assets to the landscape

Comprehensive baseline data of species & habitats prior to all sites for development? This should give consideration to 'condition assessments' to prioritise sites in need of suitable management and monitoring schemes instated. Phase 1 habitat surveys and more up to date ecological data of habitat distribution where data is absent or minimal. In order to identify sites of significance and opportunities for biodiversity gain and enhancement, as well as wider ecological connectivity & networks.

Housing and neighbourhood design looking at biodiversity opportunities & enhancements. For example, bat and swift boxes in housing design (including individual homes and smaller housing sites), maintaining linear connectivity via hedgerows, verges and tree lines in the interests of greater ecological connectivity. Potential of reedbeds where viable for filtering water and contaminants whilst providing key wetland habitat. This may not just be SUDS but enhancing water courses to allow natural flood management on flood plains.

Urban green design, such as rain harvesting, living walls/roofs, wider recycling facilities, community compost schemes & local allotments. Perhaps extra consideration for some 'verges' in the interests of pollinators and the Parish Council Urban Verge project and any future rural verge opportunities.

Ties to the National and Local Biodiversity Action Plans, with regards to key species and habitats of interest and decline.

Suitability of tree planting sites prior to planting. In relation to displacing any existing habitats or species of significance. Consideration to suitable tree species and wider opportunity mapping of ecological networks to target planting schemes across the district, joining up fragmented habitats working with landowners.

Management of off-road walking and cycling routes that are not necessarily in the management or ownership of the public sector but are beneficial from an access to nature, allow healthier routes away from areas of poor air quality such as busy roads and shorten commuting routes.

Management of the non-native species as part of pre and post-development sites should be planning into the investment of green infrastructure and development.

Geological and Geomorphological ensuring that land reclamation is considered as a risk to human health. Not all sites are appropriate for SUDs because of high water table, infiltration capacity. The plan should identify regional geological sites of significance and their condition.

Consideration to Planted Ancient Woodland Sites and Ancient Woodland Sites, as well as wider tree planting schemes with sympathetic management approaches where necessary

	<p>Access to nature via Green & Blue Infrastructure can provide well-being that can support social prescribing activities such as nature walks but in turn deepen participation with conservation.</p> <p>Monitoring progress on the Government’s Environment Bill which establishes the legislation for Biodiversity Net Gain is supported however more detail needs to be provided on this policy approach. There are links between wellbeing and biodiversity (access to nature/growing spaces etc) and health can be embedded within this area, along with sustainability in planning processes.</p> <p>Biodiversity needs to be considered at not just the local level but at the wider County level to ensure any corridors created don’t stop at District boundaries – this includes a greater profile for the River Soar.</p> <p>The policy approach to these areas needs to conform with the NPPF and relevant topic specific national guidance.</p>
<p>Q12. What do you think about the proposed policy approach to heritage assets?</p>	<p>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).</p> <p>In identifying assets worthy of protection for heritage reasons, it is essential to recognise that the known resource represent 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.</p> <p>In developing tools for the conservation and enhancement of the historic environment, consideration should be given to establishing what is locally distinctive and significant, this could usefully be addressed through the designation and adoption of Local Lists and the development of Neighbourhood Plans. Critical to both, and to the wider management of the borough’s historic environment, is the maintenance and continued</p>

development of the Historic Environment Record (HER), maintained by Leicestershire County Council, Historic & Natural Environment Team.

The historic landscapes of Blaby and the wider county of Leicestershire, were the subject of an LCC study, *Leicestershire, Leicester & Rutland Historical Landscape Characterisation Project* (https://archaeologydataservice.ac.uk/archives/view/leicester_he_2019/index.cfm).

We welcome a commitment to recognise the contribution the historic environment makes to Blaby's local character and distinctiveness. Local listing, neighbourhood planning and the Historic Environment Record represent key resources and tools to contribute to this process, as a complement to national designations (Scheduling and listing, etc.). Consideration should be given to reviewing the existing conservation area designations (<https://historicengland.org.uk/images-books/publications/conservation-area-appraisal-designation-management-advice-note-1/heag-268-conservation-area-appraisal-designation-management/>). This should include better integration of the buried archaeological resource, and recognition of urban and rural landscape context.

We welcome the intention to protect and enhance heritage assets in line with the approach in the NPPF and the approach currently set out in the Delivery DPD. However, it is also essential that policy recognises that a significant proportion of the built and buried historic environment remains as yet to be identified and where necessary designated. Consequently it essential that as development and other land use works come forward, their impact upon the historic environment is thoroughly investigated.

As necessary, the approach will need to take appropriate of 'Well-managed Highway Infrastructure: A code of Practice Recommendation 36 – Authorities should identify a schedule of listed structures, ancient monuments and other relevant assets and work with relevant organisations to ensure that maintenance reflects planning requirements.'

There is a link between ancient and historic farmland and semi-natural grassland. Development should significantly protect these sites rather destroy them and should also replace with high-quality species rich grassland. Species rich grassland and semi-natural grassland is in decline in Leicestershire. There should be consideration of; Heritage audit of listed (National and Local) buildings and assets across the district, the heritage of Planted Ancient Woodland Sites and Ancient Woodland Sites as heritage of the landscape and

	<p>the role of cemeteries as natural heritage asset and consider buffers, corridors and step stones around these biological diversity assets.</p> <p>There is agreement that historic landscape can be a cross border consideration.</p> <p>The policy approach to these areas needs to conform with the NPPF and relevant topic specific national guidance.</p>
<p>Q13. What do you think about the proposed policy approach to environmental quality?</p>	<p>There is broad agreement that this policy approach seems robust.</p> <p>With regards Para. 6.5.2, <i>“Development proposals will need to demonstrate that unacceptable adverse effects can be mitigated for the following environmental quality issues”</i> this would ideally go on to suggest Health Impact Assessments as a tool to do this, especially regarding air quality. It is also not just about mitigation, but improvement through development, and would like to see more around positive engagement and strategies with developers around prompting reductions in residents and employers impacts on air quality.</p> <p>Public Health have contributed to the Blaby Air Quality Action Plan as a key partner, and Blaby are key attendees to the County Health and Air Quality steering group, so to see this partnership commitment represented more widely in the local plan would be positive.</p> <p>The policy approach to these areas needs to conform with the NPPF and relevant topic specific national guidance.</p>
<p>Q14. How can the Local Plan best assist in the delivery of healthy communities?</p>	<p>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.</p> <p>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 this respect, it is important to note that in the Summer of 2020, the Government made a significant shift in its overall policy</p>

towards cycling, with the publication of its Gear Change document and associated new design standards. There is now a strong emphasis on cyclists being treated as equals with motorist 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 (either financial or direct delivery) towards the upgrade of cycling and walking routes between the site and key local destinations and services that do not comply with the Government's latest design guidance.

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.

The Health Impact Assessment accompanying the Local Plan policies and proposals will strengthen its impact, and hopefully allow local communities the opportunity to feed into the process through community engagement around their views on health, barriers and motivators and health needs first-hand.

The Local Plan can best assist with the delivery of healthy communities by embedding health considerations throughout the policies associated with the plan. Health considerations do not always need specific standalone policies and can work best when embedded into others as part of a 'Health in all Policies' approach.

To support with education, the right infrastructure and positioning of each primary school in a development can create tailor made travel plans to ensure environmentally friendly movement of pupils and parents.

Applicable as a response to Question 14-17, by meeting agreed national and local standards for the delivery of open space and opportunities for sport and recreation linked to a Green Infrastructure policy that facilitates opportunities for walking, cycling and countryside access a significant contribution can be made to the health and well-being of the local community. In the allocation of future development sites priority should be given to those sites with the ability to deliver open space and green infrastructure capable of providing a positive contribution to the wellbeing of the wider community, for example the County Council's land north of Hospital Lane, Blaby.

<p>Q15. What specific health-related requirements would you wish to incorporate in the Local Plan and its policies?</p>	<p>Although the consultation identifies 'differing views' so far expressed around the requirement for Health Impact Assessments, we see these as pivotal tools to make structured, evidence-based planning decisions based on need and to reduce health inequality. If we are able to keep people in good health (increasing healthy life years) this is beneficial to the residents and the local area, its economy and demand on local healthcare services.</p> <p>The plan covers physical activity and restrictions on unhealthy foods, but the plan can assist in delivering healthy communities by considering increased access to sustainable, healthy food options.</p> <p>Access to green space not only improves physical health, but also mental and emotional health.</p>
<p>Q16. What do you think about the proposed policy approach to Green Infrastructure?</p>	<p>The County Council is pleased with the inclusion of this since the 2019 issues and options consultation.</p> <p>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.</p> <p>Public Health would be pleased to help contribute to the further evidence required in terms of the wider aspects of Green Infrastructure and its links to health and wellbeing such as air pollution and access to green space.</p> <p>It is not just about retaining existing green infrastructure but about how new development can create biodiversity corridors and the linkages between new and existing. Further evidence on Green Infrastructure should be considered, including the LLEP's commissioning of a Natural capital evidence base which could led to the production of a Natural Capital Investment Plan.</p> <p>This section should reference the opportunity mapping produced in the GI & Landscape Sensitivity Study produced for the Strategic Growth Plan (see response to Q8).</p> <p>It is also worth noting that green spaces are beneficial if varied in habitat types and proximity to development; may include gardens, community spaces, street trees, verges. Again, consideration of</p>

	<p>maintenance/ long term management needs to be considered and factored into proposals (see response to Q17). Green Infrastructure may well have cross boundary implications.</p>
<p>Q17. What do you think about the proposed policy approach to open space, sport and recreation?</p>	<p>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 sport and recreation.</p> <p>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.</p> <p>Green spaces are beneficial if varied in habitat types and proximity to development; may include gardens, community spaces, street trees, verges. Again, consideration of maintenance/ long term management needs to be considered and factored into proposals (See response to Q16).</p> <p>It should be noted that if a school is the centre of a village, sport and recreation facilities should be close by.</p>
<p>Q18. What do you think about the proposed approach for the designation of Local Green Spaces being undertaken through Neighbourhood Plans?</p>	<p>The suggested devolution for local Green Spaces to Neighbourhood Plans is noted and generally welcomed. Supporting local people to gather suitable evidence to present the value of local green space would be welcomed as part of the planning policy.</p> <p>It will be important to ensure that if this approach is adopted, any risk is mitigated that the designation of Local Green Spaces through Neighbourhood Plans is 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. As per responses to other questions, it will be important that such strategic transport infrastructure requirements are identified during the development of the Local Plan and robust policies are included in it to protect their delivery, alignments etc. There has been little take up of the Neighbourhood Planning process across Blaby District and BDC could seek to adopt this approach even in areas where no Neighbourhood Plan groups exist. The Local Plan should include narrative on BDC's support and encouragement for more Neighbourhood Plans to come forward within the district.</p>

	<p>The designation of Local Green Spaces within Neighbourhood Plan should have due regard to the guidance of the NPPF and, in particular, not be extensive in area. Further, any designation should complement (and not seek to overrule) any strategic open space and green infrastructure policies adopted as part of the Local Plan. 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. The County Council would not wish for a disconnect between the two to occur.</p> <p>The waste team consider this is a positive step as aligns with the NPPF which encourages local communities to identify Local Green Spaces as locally driven designations; therefore, it makes sense that they are the ones designating them through Neighbourhood Plans.</p> <p>Community involvement and ownership in identifying suitable spaces for designation as Local Green Space seems to support this approach.</p>
<p>Q19. What do you think about the proposed policy approach to affordable housing?</p>	<p>In undertaking the proposed Local Plan viability assessment it will be important for the District Council to ensure that it has as complete an understanding as is proportionate and possible about the potential costs of enabling growth across its area.</p> <p>From a transport perspective, it will be particularly important to understand any costs associated with dealing with cumulative impacts of growth, including those arising from cross-boundary inter-actions. (This operates both ways, i.e. cross-boundary impacts of growth in Blaby District impacting on a neighbouring area and/or growth in a neighbouring area impacting on Blaby District.). Potential impacts on the Strategic Road network will also need to be considered.</p> <p>The proposal to refresh the HEDNA to provide up to date evidence of the required level, mix and tenure split of affordable housing is supported especially in the light of the need to provide additional affordable housing to meet Leicester City's unmet need. Similarly, the undertaking of a Local Plan Viability Assessment to ensure the affordable housing policy is viable is also supported. However, the emerging policy should provide for a mechanism whereby the level of affordable housing can be determined on the basis of site-specific viability considerations in order not to constrain housing delivery.</p> <p>The Local Plan viability assessment should include the cost for community facilities such as schools as well</p>

	<p>as affordable housing. It is hoped that the Housing and Economic Needs Assessment would include community/stakeholder engagement around affordability to gain a real-life perspective. Healthy, safe housing is a basic need for people's health to flourish. This also needs to be placed in the right area for employment access and social connectivity.</p> <p>Regarding Section 8.1.1, the mention of rural exception sites is welcomed as it supports a Leicestershire Rural Partnership priority and BDC have the good example of Cosby.</p>
<p>Q20. What do you think about the proposed policy approach to the mix of housing?</p>	<p>The County Council is supportive of using the most recent evidence to demonstrate need in terms of housing type, tenure and size as this best fits the housing needs of the local communities. As such, the approach of basing housing mix on an updated HEDNA assessment is supported. A needs-based rather than market led approach needs to be adopted to meet health needs around housing and economic inequality.</p>
<p>Q21. What do you think about the proposed policy approach to older persons and specialist housing?</p>	<p>Housing for an ageing population and specialist needs requires strong policy requirements and specific allocations. There is agreement that the location of such provision will need to be carefully considered in terms of accessibility to key services; bearing in mind specialist needs, mobility issues etc. It is noted that there is the intent to undertake a Local Plan viability assessment to assess the viability of the older persons and other specialist needs policy and other policies that result in financial burdens affecting a development and request involvement with adults and communities and the Section 106 team at the County Council in undertaking this work. Continued engagement with Adults and Communities is supported.</p> <p>The approach of basing housing mix on an updated HEDNA assessment is supported as is the need for such provision to be subject to a viability assessment. Further, it is recognised that the provision of older person and specialist housing can be most effectively provided as part of a Strategic Development where it can be easily co-located with and have easy access to local services and facilities.</p> <p>We would want to follow the evidence base around needs from the Housing and Economic Needs Assessment to ensure that older persons needs and needs around specialist housing were properly considered.</p> <p>Adults & Communities would encourage and commit to a partnership approach to the identification of</p>

	<p>need/demand for specialist housing requirements for older people and adult populations with vulnerabilities.</p> <p>There are vulnerable populations whose numbers do not indicate the need for each Borough and District to develop their own response i.e Transforming Care. It would be beneficial for individual Borough and District partners to commit to collaborate on meeting the housing needs of these populations.</p> <p>Adults & Communities would welcome ‘whole life’ and ‘whole community’ development models with an emphasis on a strong commitment to being dementia friendly. The County Council would wish 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.</p> <p>The inclusion of 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. It is recognised bungalows are land inefficient but they do offer ‘life time home’ opportunities.</p> <p>Extra Care Housing and Supported Living would benefit from being located within walking distance of the facilities such as leisure, health, retail, employment. Locating specialist developments within walking distance of green space and leisure would be welcomed as we know the benefits this has on physical, mental health and wider population wellbeing.</p> <p>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. 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.</p>
<p>Q22. What do you think about the proposed policy approach to accommodating Gypsies and</p>	<p>The overall approach makes sense especially as it will be evidence lead as far as need, what we would like to see is some detail or commitment as to how that need may be met and especially how any social provision may be met in the future. The statement ‘<i>State the approach to identifying new accommodation where an outstanding need is identified</i>’ is a little general, Blaby District currently has a healthy mix of socially rented Gypsy and Traveller pitches but further pitches may need to be provided in the future along with the already identified need for Local Authority run Transit pitches for which delivery may be shared</p>

<p>Travellers?</p>	<p>with the other authorities in Leicestershire due to the practicality of building sites and the relatively small individual need for them.</p> <p>We welcome the results of the Gypsy and Traveller Accommodation Assessment and the health needs of this group and how the Local Plan can contribute to reducing health inequalities. We would also welcome any future update that is required and that this is considered across Leicester and Leicestershire, not just at a local level.</p>
<p>Q23. How can the Local Plan best deliver the necessary employment land and premises required to meet identified needs?</p>	<p>Given that this Local Plan is pivotal to the transition of Housing Market Area (HMA) wide housing spatial distribution from the former Regional Plan emphasis to one now driven by the Leicester and Leicestershire Strategic Growth Plan, 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).</p> <p>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 any new public building that is planned as part of a new development. Existing settlements could utilise libraries and village halls as community hubs rather than single purpose buildings as they are currently.</p> <p><i>As a response to Question 23-25</i> and as noted in response to previous questions, it is important that the plan provides a balanced strategy that delivers sufficient employment land to support higher levels of housing growth. It is important therefore that in working with the HMA authorities, the Council agrees an appropriate distribution of both housing and employment land to meet Leicester's unmet needs and deliver the growth requirements across the HMA.</p> <p>Employment uses should, wherever practical be co-located with or easily accessible to residential areas/development with specific employment allocations made within all Strategic Developments.</p> <p>The County Council has interests in land at Glebe Farm, Lutterworth Road, Blaby (ref EBLA002) that has</p>

	<p>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.</p>
<p>Q24. Are there any specific sites that you consider are suitable to deliver the employment land required?</p>	<p><i>See also response to Q23</i></p> <p>With regards 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 would wish to see 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 considered.</p>
<p>Q25. Are there any employment related requirements you would like to see incorporated in the Local Plan and its policies?</p>	<p><i>See also response to Q23</i></p> <p>Specific work space for 'Grow-on' employment use beyond starter units is understood to be required and will assist small and medium enterprises (SMEs) to evolve further.</p> <p>High skilled work considerations are welcomed especially considering space, engineering and sports science due to the JSNA/Growth Plan identification of skills being lost to outside of the county. See Q28 for considerations of sustainable travel for work and employers' contributions and engagement around this needs to be considered.</p>
<p>Q26. What do you think about the proposed policy approach to retail, leisure and town centre uses?</p>	<p>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. The consideration of changing employment patterns such as increasing levels of home working is welcomed.</p> <p>In particular, 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</p>

	<p>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.</p> <p>In considering retail and town centres, considerations needs to be given to the hospitality centre and it's recovery from the pandemic. Opportunities may arise for the re-use of retail buildings for click and collect hubs if they are not already doing so to adapt to the changes in on-line shopping habits. Provision should be made in existing and new communities that are poorly served (e.g. retail stores).</p> <p>In the light of recent changes in consumer habits and the significant increase in internet shopping the re-assessment of retail needs is supported. However, future policy needs to protect existing retail and town centres through the allocation of sufficient development to maintain sustainability.</p> <p>There is no significant mention of accessibility via walking and cycling to required shops and retail areas. Convenience retail if the only accessible option can sometimes present financial barriers to accessing healthy choices.</p> <p>It is supported that a policy will be developed to include the Fosse Park area and this should include its role in the retail hierarchy and links to Leicester City and how any future growth will be considered, given the limits on the capacity of the road network that cannot cope currently without a future expansion.</p> <p>Noting ongoing developments in the Fosse Park/M1 J21 area, which are likely to further enhance its status as a major retail, leisure and employment destination within the District, 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.</p>
Q27. Are there any tourism related requirements you would like to see	<p>Green infrastructure sites and waterways support the visitor economy and should therefore be recognised within the plan.</p> <p>The new leisure facilities at Everards Meadows brings new opportunities for integrating built leisure facilities</p>

<p>included in the Local Plan and its policies?</p>	<p>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.</p> <p>Tourism should be encouraged, especially in Town Centres to increase their chances of being sustainable.</p> <p>The LHA would be supportive of a policy which seeks to focus new leisure and tourism developments in locations which are accessible via walking, cycling and public transport.</p>
<p>Q28. What do you think about the proposed policy approach to transport issues?</p>	<p>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.</p> <p>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 overlapping 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.</p> <p>More widely, if the new Local Plan is to be the mechanism by which the first stage of SGP 'Priority Growth Corridor' is to be delivered, it will need to be supported by robust transport evidence, infrastructure and policies that take account of longer-term growth both within and without Blaby District and, as necessary, provide appropriate future proofing/protections for key transport (and other) infrastructure required to support this growth. This includes potential options for a new M1 J20a; evidence will be required to make the strategic case for the new junction, and that will have to be presented in the context of the overall Priority Growth Corridor over the lifetime of the SGP, and not just the elements relating specifically to Blaby District's emerging Local Plan.</p> <p>Given the link between delivery of the 'Priority Growth Corridor' and Blaby's Local Plan, it is recommended that Blaby DC give some consideration to a joint delivery strategy for the corridor, with authorities across the HMA, as part of their local plan preparations. This would help to ensure that Blaby's Local Plan is</p>

deliverable and viable in its own right as well as contributing to the wider Strategic Growth Plan.

Additionally, 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 (that Government has made clear will be the main vehicle by which it will award future funding for cycling and walking infrastructure improvements) nor from the wider perspective of the 'Priority Growth Corridor'.

Thus, it is very difficult to see how the new Local Plan can be developed in isolation from a transport perspective. To address the challenges faced, a collaborative and coordinated approach is required to the development of common evidence that in turn provides the basis for Plan policies and an accompanying agreed narrative as to how parties will continue to work beyond the Local Plan's (hopeful) adoption to provide the necessary infrastructure to support growth. Buy-in from all key partners will be critical to achieving this, including Highways England at a strategic level.

Regarding clean air and active travel, any potential for cycling and walking also needs to be linked to local employers as well as for exercise and enjoyment. The Health Impact Assessment can accompany the Cycling and Walking Strategy to add strength around evidence of need to developers.

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.

The Everards Meadows development, incorporating the new Everards brewery site, Rutland Cycling and a range of leisure, food and drink opportunities, provides excellent tourism opportunities that can attract, and then disperse, visitors to other attractions in the area. Its proximity to Fosse Park (one of the busiest out of town retail centres in the country with £150m expansion plans), the Marriott and Hilton Hotels, help to create a strong visitor hub in the district that can help extend visitor stays and increase visitor spend. The area has many leisure based attractions including Stoney Cove Dive Centre, Blaby Golf Centre, cycling and the National Sustrans route, the waterways, Huncote BMX Track etc that should be promoted for activity-based short breaks. The retail offer is also varied with independent garden centres, farm shops and a large

	<p>antiques centre which all complement the offer at Fosse Park.</p> <p>There is an opportunity for further development of Business Tourism in the area through the Marriott and Hilton Hotels that are well placed to take advantage of good motorway connections and close proximity to the city of Leicester.</p>
<p>Q29. Are there any specific transport issues that the Local Plan should address?</p>	<p><i>See also response to Q28</i></p> <p>To a large extent, the response to Q28 highlights probably what is one of the most significant transport issues. 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).</p> <p>The response to Q9 highlights issues regarding the provision of passenger transport services and how that might affect the scale and spatial distribution of housing growth.</p> <p>Responses to Qs 23 and 24 highlight possible issues arising from the decarbonisation of transport and increased fleet electrification and how that might impact on existing and potential future employment sites.</p> <p>With regard to cycling and walking, in summer 2020 Government marked a dramatic shift in policy on cycling in particular, with the publication of its 'Gear Change' document and associated new cycle infrastructure design guidance. The new Local Plan should reflect this.</p> <p>The Options paper makes no reference to the provision of electric vehicles in line with latest national policy and guidance. 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.</p>
<p>Q30. What do you think about the proposed policy approach to</p>	<p>To enable stronger collaborative working, the County Council will look to enter an agreement with the district council if considered necessary. This will be covered in the County Council's Infrastructure Policy which will be taken through Cabinet in May 2021.</p>

<p>provision of infrastructure and services and facilities to support growth?</p>	<p>Whilst it is to be welcomed that the District Council intends to engage with infrastructure providers, a noticeable absence from the document is reference to transport infrastructure.</p> <p>As highlighted in responses to other questions, current transport infrastructure issues, most particularly on the Strategic Road Network, are likely to represent a material restriction on the district's ability to grow, unless appropriately addressed.</p> <p>A collaborative, coordinated, approach will be required to address such challenges, critically requiring the buy-in of Highways England. The new Local Plan needs to recognise this, and to provide a robust policy framework that:</p> <ul style="list-style-type: none"> • Recognises cross-boundary and cumulative impacts • Links growth to the delivery of elements of infrastructure as appropriate • Provides the platform for securing developer contributions, either financial or in kind, towards transport infrastructure (including to address cumulative impacts) • Provides the policy framework for agreed (between the key partners) future ways of working beyond the Plan's (hopeful) adoption to develop and deliver the transport (and other) infrastructure necessary to enable growth in the district and more widely • Future proofs infrastructure and/or safeguards land as necessary to facilitate the delivery of infrastructure required to support longer-term growth in accordance with the SGP (for example in respect of the 'Priority Growth Corridor'. <p>If new growth is adjacent to existing settlements, then use of existing facilities needs to be encouraged rather than new facilities provided, to encourage their survival.</p> <p>Capacity restraints are not just limited to health facilities and schools. New development will have an impact on other types of infrastructure such as green infrastructure and the wider waste transfer network, including Household Waste Recycling Sites</p> <p><i>As a response to Q30-Q31</i>, strategic developments have the potential advantage of delivering a full range of social infrastructure necessary to support the new community and can provide benefits to the wider area by the enhancement of essential services including public transport.</p>
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<p>Q31. Are there any specific infrastructure issues that the Local Plan should address?</p>	<p>Please also refer to responses to previous questions, particularly including Qs 23, 24, 28 and 30.</p> <p>The local plan should consider where school places can be delivered. Some schools may be on constrained sites with no chance of increasing in size. In this case we would be looking either to new school sites where cumulative numbers of dwellings warrant this (with the cost of the new school and site being split between the developer's contribution to it), or in cases of single large developments e.g. 750 dwellings a new school on that site.</p> <p>The County Council would welcome the opportunity to discuss specific school sites and their ability / inability to expand.</p> <p>Primary schools Please find below, based on information received to date, details of each village / town with regard to what primary educational places would be required.</p> <p>Blaby</p> <ul style="list-style-type: none"> • Depending on which developments were built we would look to provide places at a new primary school. <p>Cosby</p> <ul style="list-style-type: none"> • Constrained site with limited capacity to expand at local primary school. We would need a new school to be built if the two largest developments were built. <p>Countesthorpe</p> <ul style="list-style-type: none"> • COU022/23 is close to Blaby BLA034 Hospital lane. We would look to provide places at a new school. • Developments south of Countesthorpe. There is no capacity at the local primary school (630 places). We would need all developments to be built to enable a new school to be built. <p>Croft</p> <ul style="list-style-type: none"> • Local primary school could expand to accommodate pupils from the development. <p>Elmesthorpe</p> <ul style="list-style-type: none"> • No current school in the village proposed numbers of dwellings would justify the provision of a new school.
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Enderby

- School on a constrained site and full with no capacity to expand.

Glenfield

- GLE030 – Possible joint venture with city for this development
- GLE031 – Expand local school to accommodate county pupils from development
- GLE032 – New school required

Huncote

- Local school could expand by 70 places. Could not accommodate all developments

Kirby Muxloe

- As an overview there are too many scenarios with the number of proposed developments around Kirby Muxloe and LFE to give a full response in what primary places would be required.
- A new 210 primary is due to be built in the next few years. LCC would welcome discussions on these developments to ensure the correct size school is built.

Littlethorpe

- Depending on much further analysis, there may be an opportunity to build a new school for the village if all developments go ahead as well as those in Narborough.

Lubbesthorpe

- New school would be required.

Narborough

- Expand the Pastures and Red Hill primary schools or create the space by building a new primary at Littlethorpe.

Sapcote

- M69 J2 development. – We have consulted on this and produced forecast pupil numbers and number of schools required.
- Other developments. – All Saints primary has expanded to 420 pupils and is now constrained by the site size to expand further. Individual sites could put a strain on education places but if all developments were agreed a new school would need to be built. This could be tied in with Stoney Stanton developments.

Stoney Stanton

- As above Individual sites could put a strain on education places in the village but if all developments

were agreed a new school would need to be built. This could be tied in with Sapcote developments.

Thurlaston

- School on a restricted site and currently full.

Whetstone

- Whetstone Pastures. - We have consulted on this and produced forecast pupil numbers and number of schools required.
- South of Whetstone. – WHE031 we would look to provide places at a new primary school.

Secondary Schools

Blaby district is served by three secondary schools, Braunstone Winstanley, Enderby Brockington and Countesthorpe Leysland. Most students from Stoney Stanton and Sapcote attend Hinckley secondary schools. There is also a planned new secondary school to serve the new Lubbesthorpe development.

Previous consultations for Whetstone Pastures and M69 JS / Land west of Stoney Stanton have identified that these two new developments would require their own secondary schools.

Whilst there is some capacity in the system for secondary places, the number of dwellings in the proposed smaller schemes would require either expansion (if possible) of current and future secondary schools or / and a possibility to create a further new secondary school.

Early Learning Provision

The Childcare Act 2006 places a duty on the County Council for the provision of sufficient childcare places and early education. Leicestershire's Planning Obligations Policy requests, where a need is shown, that developers pay for 8.5 places per 100 dwellings on developments with 100 dwellings or above. If a new school is required, additional land will also need to be made available free of charge.

High speed broadband is critical for businesses and for access to services, many of which are now online by default. Having a fast broadband connection is no longer merely desirable but is an essential requirement in ordinary daily life.

Fibre Broadband

	<p>All new developments (including community facilities) should have access to ultrafast broadband (of at least 100Mbps) and allow mechanisms for securing a full fibre broadband provision for each premise and business from at least one network operator, provided on an open access basis. Such provider must deploy a Fibre to the Premise (FTTP) access network structure in which optical fibre runs from a local exchange to each premise.</p> <p>Developers should take active steps to incorporate adequate broadband provision at the pre-planning phase and should engage with telecoms providers to ensure fibre broadband is available as soon as build on the development is complete. Where practical, developers should consider engaging several telecoms providers to encourage competition and consumer choice.</p> <p>The Council supports a ‘dig once’ approach for the deployment of communications infrastructure and a build which is sympathetic to the character and appearance of the surrounding area. The Council encourages telecommunications build which does not significantly impact on the appearance of any building or space on which equipment is located and which minimises street clutter.</p> <p><u>Waste</u></p> <p>As mentioned in the proposed policy approach (and above in Q30), engagement and consultation with infrastructure providers is key. The Local Plan should ensure waste facilities (such as Household Waste Recycling Centres) are accounted for in the Infrastructure Delivery Plan (IDP) as growth will impact the capacity of these sites. Additionally, ensuring there is specific and appropriate space and access provision for the storage of bins and access of waste vehicles is essential for any new development.</p>
<p>Q32. Are there any specific issues that the Local Plan should address in relation to planning obligations and developer contributions?</p>	<p>In undertaking the proposed Local Plan viability assessment (i.e. to what extent can development afford to pay for the necessary infrastructure – transport or otherwise – required to enable the district’s growth) it will be important for the District Council to ensure that it has as complete an understanding as is proportionate and possible about the potential costs of enabling growth across its area. From a transport perspective, it will be particularly important to understand any costs associated with dealing with cumulative impacts of growth, including those arising from cross-boundary inter-actions. (This operates both ways, i.e. cross-boundary impacts of growth in Blaby District impacting on a neighbouring area and/or growth in a neighbouring area impacting on Blaby District.). Potential impacts on the Strategic Road network will also</p>

need to be considered.

As set out in response to Q30, the new Local Plan needs to recognise the above, and also to provide a robust policy framework that, amongst other things, provides the platform for securing developer contributions, either financial or in kind, towards transport infrastructure (including to address cumulative impacts).

As above in Q31, the Local Plan should ensure waste facilities (such as Household Waste Recycling Centres) are accounted for in the Infrastructure Delivery Plan (IDP) as growth will impact the capacity of these sites.

This also links to wider determinants of health and health inequalities within the district and should be underpinned by the Health Impact Assessment - what does the evidence show us is needed? Improved physical activity opportunities especially for adults and older people.

Reference needs to be made to the LCC Planning Obligations Policy (2019) and any updated version to make sure that the emerging plan cross-references and supports our requests.

The County Council wishes to see inclusion of an over-arching policy in the emerging new Local Plan that prioritises developer contributions towards essential infrastructure, most notably education and transport above others.

The County Council wishes to ensure policies relating to individual site allocations are based on robust viability evidence to make sure that infrastructure and housing is affordable and deliverable. These policies need to make explicit reference to the need to secure funding, and where appropriate, land to deliver infrastructure.

The emerging new Local Plan needs to provide appropriate development frameworks for delivering strategic allocations (e.g. AAP, masterplan etc.) and these frameworks need to be brought forward in conjunction with the County Council as well as other stakeholders. The County Council wishes to see clear and explicit wording that frameworks must be produced to SPD standard, need to be subject to formal consultation processes and that planning applications must not come forward until frameworks are in place.

	<p>The County Council wants to reinforce the fact that viability and how Blaby DC deals with viability is clearly identified in their emerging new Local Plan and that the Blaby DC Planning obligations policy document is updated to reflect existing policy and that contained in the County Planning Obligations guidance document.</p>
<p>Any other comments</p>	<p>The County Council, as Minerals and Waste Planning Authority, would like to see that any large new allocations on greenfield land in the replacement plan do not result in intrusion or sterilisation of any areas which are identified as minerals safeguarding areas. Using such areas for large scale development can impact on the ability of the Minerals and Waste Planning Authority to ensure the long term delivery of strategic mineral resources.</p> <p>The Local Highway / Transport Authority welcomes this further, formal opportunity to input into the development of the new Local Plan. The comments that it has provided in this response are intended to be constructive and helpful in aiding the successful development and (more importantly) delivery a new Blaby Local Plan, a Plan that provides not just for the needs of its residents and businesses, but that is the first step towards delivery of the Leicester and Leicestershire Strategic Growth Plan (SGP). The SGP provides a platform on which the area's transport (and other infrastructure) needs can be identified and planned for and provides the best opportunity to secure the delivery of the infrastructure necessary to meet the area's future population and economic needs out towards 2050. It will continue to seek to work with Blaby District Council and with Housing Market Area colleagues more widely to achieve the successful development of the new Local Plan and its delivery and that of the SGP.</p> <p>In the light of the above, it is important that the new Local Plan recognises the pivotal role that it has to play in transitioning to the Strategic Growth Plan (SGP) spatial distribution of Housing Market Area housing requirements, and to provide the necessary narrative context and policy framework to enable that transition. In this respect currently:</p> <p>The spatial distribution/site options section of the document does little to 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</p>

settlement), but also the mass needed to justify additions required to the Strategic Road Network (for example, an M1 Junction 20a).

The transport challenges faced in providing for further growth in Blaby district are already considerable, not least in respect of the current issues on the Strategic Road Network; these challenges will be compounded should the new Plan fail to recognise its key role in the delivery of the SGP.

In a similar vein to the response to Q18, it is important in framing Local Plan policies on green wedges and areas of separation that application of such policies takes account of/does not constrain delivery of potential off-site strategic transport (and other) infrastructure required to support growth proposed through this Local Plan, other emerging Local Plans and longer-term through the SGP.

The Local Highway / Transport Authority remains committed to working with Plan making authorities to secure the successful adoption and delivery of Local Plans, recognising that it is relatively 'easier' to deal with the impacts of 'planned' growth from an infrastructure and service provision perspective vs. dealing with the impacts of 'unplanned' growth.

Comment on Appendix A – Summary of Site Assessments

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 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.

NEW LOCAL PLAN SUSTAINABILITY ASSESSMENT

Alongside the Consultation document, the Council has published the Interim Sustainability Appraisal (SA) Report prepared by AECOM. The SA considers alternative approaches to housing growth and distribution and also provides an appraisal of specific site options.

SITE APPRAISAL PROFORMAS

Appendix E to the SA set out individual site appraisal proformas for sites. It is noted that the following sites being promoted by the County Council for residential development are included in the appraisal:-

Land North of Hospital Lane, Blaby (BLA 031)

Land west of Leicester Road, Countesthorpe (COU022)

Land at Poplars Farm, Croft (CRO006)

Steeplechase Farm, Kilby (KIL002)

Land at Bloods Hill, Kirby Muxloe (Part of KMU 021)

Land at London Leys Farm, Sapcote (SAP029)

The assessment notes that all of the sites are achievable and available with the potential to deliver housing development during the plan period; the site at Kilby being the only achievable option in the village. Whilst some sites are projected to be brought forward in years 6 – 10 and beyond, if allocated, all the sites can be brought forward within the first five years of the plan.

In terms of impacts on biodiversity, through sensitive masterplanning there is scope to incorporate existing trees and hedgerows as part of all developments. Most sites are well related to the existing build form of the settlement and thus, with sensitive masterplanning, development can be accommodated on each site without unacceptable impact on the wider landscape, and therefore unlikely to have any significant effects. Similarly, any potential heritage impacts can be mitigated. In particular, the potential to provide open space, sports pitches and appropriate green infrastructure for the benefit of local communities will be maximised.

The assessment notes the individual constraints relating to each site. In developing detailed proposals all constraints will be addressed and any adverse impacts of development mitigated to the satisfaction of the LPA.

The County Council also owns **Land at Boundary Farm, Sapcote (STO 028 [part of Strategic Site STO 026])**.

The overall site represents a major opportunity to bring forward an infrastructure led sustainable Strategic Site, in a priority economic growth area, capable of delivering up to 5000 new dwellings with associated employment, community facilities and green infrastructure.

In addition, the following potential employment site has also been assessed:-

Land off Lutterworth Road, Blaby (EBLA002)

The site at Lutterworth Road represents the only reasonable site for employment development assessed and provides a suitable extension to the existing employment area in this location.

Accordingly it is considered that all of the above sites represent suitable and sustainable options that should be considered for allocation in the Local Plan. Further, all of the sites are both available, with a willing landowner, and deliverable.

Note; Separate site specific responses will be submitted in respect of the County Council's site north of Hospital Lane, Blaby, the land at Blood's Hill, Kirby Muxloe and the proposed Strategic Development Area on land to the west of Stoney Stanton being promoted by a landowner consortium including land at Boundary Farm, Sapcote