



CABINET – 29 MARCH 2022

RESPONSE TO THE NORTH WEST LEICESTERSHIRE LOCAL PLAN REVIEW: DEVELOPMENT STRATEGY AND POLICY OPTIONS (REGULATION 18) CONSULTATION

REPORT OF THE CHIEF EXECUTIVE

PART A

Purpose of the Report

1. The purpose of this report is to advise the Cabinet on the content of North West Leicestershire District Council's (NWLDC) Development Strategy and Policy Options Regulation 18 Local Plan consultation and set out the response as the views of the County Council.
2. The detailed comments are set out in the Appendix to this report, whilst key comments are highlighted in paragraphs 39 to 92 below.
3. As the consultation period ended on 14 March 2022, it was agreed with NWLDC that comments would be submitted by this date as the County Council's views. Any additions or amendments arising from consideration by the Cabinet will be submitted to NWLDC following the Cabinet meeting.

Recommendations

4. It is recommended that:
 - (a) The County Council's response to the North West Leicestershire District Council's (NWLDC) Development Strategy and Policy Options consultation, set out in paragraphs 39 to 92 inclusive, and the appendices to the report be approved;
 - (b) The Chief Executive, following consultation with the Cabinet Lead Member, be authorised to submit further NWLDC Regulation 18 consultation responses as the views of the County Council unless there are substantive issues raised which need to be considered by the Cabinet;
 - (c) NWLDC be advised that the County Council considers that partnership working arrangements between the District Council, the County Council and other partners are vital in the preparation of its new Local Plan and the ongoing commitment to the Growth Collaboration Agreement between the County Council and NWLDC is encouraged.

Reasons for Recommendation

5. The response sets out key comments for consideration by NWLDC in the early stage of developing its new Local Plan. It seeks to ensure alignment with the outcomes of the County Council's current Strategic Plan (and the emerging Strategic Plan 2022-26) and the Leicester and Leicestershire Strategic Growth Plan (SGP), and to influence the content of the Local Plan in the interests of local communities, including to ensure that the Local Plan provides as robust as possible policy framework for securing the provision of the infrastructure and services required to support its successful delivery.
6. NWLDC's approach to developing its Local Plan involves three Regulation 18 consultations which each time will build on consideration of previous consultation findings. It is not deemed necessary to return to the Cabinet at successive meetings unless there are substantive issues needing to be considered and therefore a delegation is sought to enable the Chief Executive, following consultation with the lead Cabinet Member, to submit responses as the views of the County Council.
7. In the current financial climate, the risk to the County Council needs to be minimised. Therefore, a joint commitment to developing a strategy for how infrastructure will be funded in the NWLDC Local Plan is essential and it is vital that developer contributions are secured to support mitigation strategies and to facilitate growth. The Growth Collaboration Agreement established between NWLDC and the County Council in spring 2021 will help to oversee the effective delivery of growth whilst protecting and enhancing the communities, economy and environment of North West Leicestershire.

Timetable for Decisions (including Scrutiny)

8. The County Council's consultation response was submitted to NWLDC in line with the deadline of 14 March 2022. Any additions or amendments arising from consideration by the Cabinet will be submitted to NWLDC following the Cabinet meeting.

Policy Framework and Previous Decisions

9. In 2018, the County Council, Leicester City Council, the seven district councils in Leicestershire, and the Leicester and Leicestershire Enterprise Partnership, (LLEP) approved the Leicester and Leicestershire Strategic Growth Plan (SGP) which provides the long-term vision for planned growth for the area up to 2050.
10. For the north west parts of Leicestershire, the foci for growth set out in SGP are:
 - Managed growth for Coalville and further sustainable development consistent with the need to support local growth (in particular, aspirations for continued town centre regeneration and better services) and;

- The Leicestershire International Gateway, focused around the northern parts of the A42 and M1, where there are the major employment opportunities.
11. The Council's Strategic Plan (2018 to 2022) "Working together for the benefit of everyone" was approved by the County Council in July 2020 (having been revised in light of the Council's declaration on climate change). It has five strategic outcomes, with the delivery of 'Affordable and Quality Homes' and 'Strong Economy' most directly affected by NWLDC's emerging Local Plan.
 12. The Council's updated Strategic Plan (covering the period 2022-2026) is being presented to the Cabinet for approval at its meeting on 29 March 2022. The proposed strategic outcomes include 'Strong Economy, Transport and Infrastructure' and a 'Clean, Green Future' to ensure Leicestershire has the infrastructure to meet the demands of a growing population, whilst looking to tackle climate change, biodiversity loss and unsustainable resource usage.
 13. The Leicester and Leicestershire Strategic Transport Priorities (LLTSTP) was approved by the Cabinet in November 2020. This document was developed by the County and City councils alongside the SGP to ensure the long-term development needs and associated transportation requirements are co-ordinated.
 14. On 22 June 2021, the Cabinet received a report regarding the Leicester and Leicestershire Statement of Common Ground Relating to Housing and Employment Land Needs (SoCG). This SoCG was prepared to accompany the Charnwood Local Plan process but also provides context for the current stage of the NWLDC Local Plan process.
 15. On 19 November 2021, the Cabinet agreed that the County Council would become a signatory to the Leicester and Leicestershire Statement of Common Ground Relating to Strategic Warehousing and Logistics needs (September 2021) to help inform an approach to meeting the Leicester and Leicestershire need and to maintain an appropriate supply across the area. This includes several potential Areas of Opportunity in and around North West Leicestershire.

Resource Implications

16. Local plans inevitably come with significant infrastructure requirements for the County Council with highways and education being the key concerns. A Local Plan in an individual district can typically have a public sector infrastructure investment requirement exceeding £100 million. A good Local Plan is essential if the associated financial risks are to be managed:
 - Cost can be minimised through the co-ordination of infrastructure design and development across individual developments.
 - Opportunities for Government funding can be maximised through clear justification.
 - The risk of not securing the right amount of funding from developers is reduced.

- Sound modelling ensures developments are viable and can fund their share of infrastructure costs.
17. When a Local Plan is in place, the County Council remains heavily dependent on the district council, as the local planning authority, to secure the developer contributions needed to deliver the capital investment. Without significant assurance in this regard the risk of entering into forward funding arrangements, which allow infrastructure to be developed in advance of housing, would not be feasible. And even if such significant assurance could be secured, decisions would need to be taken against the backdrop of the wider pressures on the Council's finances, including those from other local plans, rather than each being considered in isolation.
 18. The NWLDC Local Plan needs to be seen in the context of established and emerging plans across Leicestershire which is compounding the risks that the County Council and ultimately the taxpayer bears.

Circulation under the Local Issues Alert Procedure

19. This report will be circulated to all Members.

Officers to Contact

Tom Purnell
Assistant Chief Executive
Tel: 0116 305 7019 Email: tom.purnell@leics.gov.uk

Simon Lawrence
Growth Service and Major Programmes Manager
Tel: 0116 305 7243 Email: simon.lawrence@leics.gov.uk

Sharon Wiggins
Strategic Planning Manager, Chief Executive's Dept.
Tel: 0116 305 8234 Email: sharon.wiggins@leics.gov.uk

Tim Smith
Strategic Planning and Policy Officer, Chief Executive's Dept
Tel. 0116 305 7219 Email: tim.smith@leics.gov.uk

PART B

Background

20. The preparation of Local Plans involves various stages of consultation. This consultation from NWLDC is known as a “Regulation 18” consultation and forms an early stage in local plan making. Comments received will inform the District Council’s policy recommendations ahead of a further Regulation 18 consultations on potential site allocations, and draft policies, expected in April-May 2022 and October-November 2022, respectively. A Pre-Submission Consultation known as a “Regulation 19” is due by summer 2023 and adoption of the Local Plan is anticipated by summer 2024.
21. The North West Leicestershire Local Plan 2011 to 2031 was adopted by the District Council on 21 November 2017. Whilst a Partial Review was undertaken and adopted in March 2021, this did not include any review of the need for development in the District, or the allocation of land to meeting it. This ‘substantive’ Local Plan Review will cover the period to 2039.
22. The Government’s Planning White Paper, considered by the Cabinet on 18 September 2020, proposed ‘end to end’ reform of the current planning system in England, however specific details of any reform and when they might be introduced remains uncertain. The Levelling Up White Paper (February 2022) does however, suggest that local plans will be made simpler and shorter and that improved data will ensure that they are increasingly transparent and understandable, with more of a focus on housing delivery on brownfield sites and the ability for communities to have a meaningful say on individual planning applications being retained.
23. In December 2020 the Government announced a new Standard Method for the calculation of local housing need, which included a 35% uplift for the 20 largest cities and urban areas in England, including Leicester. For the Leicester and Leicestershire Housing Market Area this gives an indicative housing need figure of 5,520 per year for the period 2020-2036. Whilst the figures in the districts remain largely the same, the need in Leicester has increased by about 10,000 homes (600 homes per year). The Government has however, indicated it may make further changes to its methodology for calculating local housing need requirements.
24. Despite this uncertain context, NWLDC have chosen to proceed with its Local Plan Review as it would otherwise result in unacceptable delay to the Local Plan’s preparation. NWLDC will re-evaluate the position as and when further Government announcements are made.

Duty to Cooperate

25. It is recognised that should a Housing Market Area (HMA) authority identify, quantify and provide robust evidence to demonstrate an unmet need, it is incumbent upon the HMA authorities to jointly resolve any cross-boundary matters under the Duty to Co-operate.

26. Whilst it is acknowledged that Government intends to reform the planning system there is as yet no timetable for such reforms. The Duty to Cooperate is a key to the ongoing success of the SGP. Without the SGP and without a clear aligned approach to delivery, Leicestershire faces high levels of speculative/indiscriminate development with the consequent high risk of inadequate highway and education infrastructure. To avoid this, ongoing commitment from all the local authorities to the SGP is therefore crucial, as is their support for a collaborative and coordinated approach to the defining and allocating of infrastructure funding requirements of local plans.
27. All ten partners agreed to a Joint Position Statement relating to Leicester's Housing and Employment Land Needs in September 2020. This sets out how the local authorities and the LLEP will continue to work together to accommodate unmet need for housing and employment land identified in the draft City of Leicester Local Plan.
28. In April 2021, the County Council became a signatory to a Statement of Common Ground (SoCG) prepared by the Leicester and Leicestershire local planning authorities and the County Council, guided by the Strategic Planning Group and Members' Advisory Group to support the Charnwood Local Plan process. In becoming a signatory to the SoCG, the County Council was not necessarily giving support to the content of the emerging Charnwood Local Plan. The key strategic matters covered in the SoCG under the Duty to Cooperate are; Leicester and Leicestershire Housing and Employment Needs to 2036; Unmet Need to 2036; and the process of apportioning unmet need to 2036. Signatories have subsequently agreed that the SoCG produced for the Charnwood Local Plan remains the most up to date position on unmet need (in the absence of any published evidence) and so also applies to Hinckley and Bosworth's emerging Local Plan.
29. A future SoCG for Leicester and Leicestershire dealing with the apportionment of unmet need from the City to the district councils will be informed by strategic evidence work currently being undertaken by partners in Leicester and Leicestershire to inform future infrastructure and growth, and work the City Council is undertaking to maximise the growth it is able to accommodate without adversely affecting the environment and quality of place. It is expected this will be available mid-2022 and will be the subject of a report to the Cabinet.
30. In November 2021, the County Council became a signatory to a separate Statement of Common Ground relating to Strategic Warehousing and Logistics Need. This builds on the Strategic Warehousing and Logistics Need Study (April 2021) and helps to inform an approach to meeting the Leicester and Leicestershire need and to maintain an appropriate supply across the area. This includes a number of potential Areas of Opportunity in and around North West Leicestershire.

Growth Collaboration

31. Some of the most high-profile and politically sensitive development initiatives in the County are located on land in North West Leicestershire. The East Midlands Development Corporation, proposed Freeport and potential new town-scale residential developments will place considerable focus on the County Council in respect of its statutory infrastructure responsibilities (particularly delivery of transport and education), and other impacts including those on the environment, public health and adult social care.
32. A Growth Collaboration Agreement was established between NWLDC and LCC in spring 2021 to oversee the effective delivery of structural and economic growth whilst protecting and enhancing the communities, economy and environment of North West Leicestershire. Focussing on the following major themes will enable both the County and District to consider the holistic impact of growth:
 - **Economic Growth**
 - Supporting development of the economy in NWL, so it is responsive, adaptable, diverse and high performing
 - Helping to deliver supportive infrastructure including transport, employment space and digital connectivity
 - Nurturing and supporting a talented, creative and productive population
 - **Sustainable Growth**
 - Enables achievement of environment and net zero commitments
 - The Growth Collaboration has the ability to present a clear, coordinated position to the climate emergency, net zero and political manifesto commitments, enabling achievement of policy and strategic objectives
 - **Transport**
 - Identifying need, funding mechanisms and supporting delivery of transport infrastructure to underpin the delivery of growth
 - **Strategic Planning**
 - NWL's Local Plan enables the County Council to understand the full extent of risk arising from its requirements from a statutory authority perspective
 - The authorities collaborate, sharing knowledge and expertise where appropriate and agreed, to enable growth delivery
 - **Aligning External Approach / Ensuring Stakeholder Awareness**
 - Building strong and supportive external relationships / networks
 - Communicating effectively both internally and externally
33. NWLDC's Local Plan has the ability to underpin and support growth and delivery of supporting infrastructure. However, ad-hoc development (creating

cumulative impacts) and the cost of delivering infrastructure (particularly highways and education infrastructure) is considered to be one of the greatest financial risks to the public sector. To compound existing issues, recent market trends have seen project cost estimates increase significantly. In order to identify, mitigate and manage these risks, the County Council welcomes NWLDC's commitment to supporting infrastructure delivery through early and consistent engagement with the County Council.

34. It is vital that developer contributions to housing and infrastructure projects are set accurately and continually reviewed to ensure increasing project costs can be recovered, reducing financial exposure to the public sector. Where shortfalls exist or risks are identified, the Growth Collaboration work must focus on these areas in order to create innovative solutions and mitigations.
35. The County Council has established a range of policies and made political manifesto commitments to support the achievement of net zero carbon emissions in Leicestershire by 2045. The Growth Collaboration Agreement has the ability to aid achievement of these targets, alongside the establishment of supporting Biodiversity Net Gain requirements.

Overview of content of North West Leicestershire Local Plan document

36. This is an early stage consultation dealing with a select number of key issues including development strategy options for housing and employment, as well as additional specific policy topics.
37. At this point, the consultation is somewhat exploratory however some preferred options and draft policy wording is presented. NWLDC is seeking views from partners, other stakeholders, businesses and communities to inform the development of the Local Plan.
38. NWLDC intends to carry out two further Regulation 18 consultations prior to the end of 2022 which will include consideration of sites proposed for allocation, policies for affordable housing and housing mix, and infrastructure requirements, including for transport.

Response to the North West Leicestershire Local Plan document

39. The County Council welcomes the opportunity to comment on NWLDC's Development Strategy and Policy Options Consultation at this early stage of the plan making process.
40. The close working NWLDC has with other partners in the Leicester and Leicestershire Housing Market Area is recognised, supported and commended.
41. The comments of the County Council in response to the 26 questions posed in the consultation are set out in the Appendix to this report. A summary of the key issues raised is set out below, covering:
 - Overarching Response

- Local Plan Review Objectives
- Settlement Hierarchy
- Housing and Strategy Development Options
- Employment and Strategy Development Options
- Health and Wellbeing
- Renewables and Low Carbon
- Comments from the County Council as a landowner

Overarching response

42. The consultation document provides a clear structure with well explained content providing a narrative which helps the reader to understand the thinking behind the approach being taken to the preparation of the Local Plan Review. The approach involves three early consultations (the first of which is this current consultation) which each time will build on NWLDC's consideration of the consultation findings and is linked to key releases of information (the expected Leicester and Leicestershire Statement of Common Ground dealing with distribution of unmet need to the districts, and the full 2021 Census release). Following the three consultations NWLDC anticipates being in a position to prepare its draft Local Plan for submission (Regulation 19) in June 2023.
43. The Local Highway Authority (LHA) is supportive of the Development Plan however has had a relatively limited opportunity to input into the Local Plan's development to date. For example, whilst noting that this draft of the Local Plan contains no site allocations, the future housing numbers and employment land provision are/will be, presumably, informed by some considerations of potential sites available. It is unclear at this time how the LHA's comments on NWLDC's Strategic Housing and Employment Land Availability Assessment (SHELAA) sites might have informed the District Council's decisions to date.
44. The LHA looks forward to closer working with the District Council going forward, including to develop an appropriate transport evidence base and to identify any highways and transport measures and infrastructure required or enable the District's future growth, including to address cumulative impacts of growth (within and without the District). The LHA will expect the new Local Plan to provide a robust policy basis, one that links growth to the provision of highways and transport measures and infrastructure as appropriate and provides for the securing of developer contributions towards the delivery of such.
45. It is likely to be appropriate for the new Local Plan to reference the Interim Coalville Transport Strategy. Dependent on the outcome of the Local Plan evidence work, it may be necessary to reconsider the level of contributions paid by developers towards the Strategy's delivery under the Policy position previously adopted by NWLDC and to consider whether the scope of its Policy position should be extended in geographical and/or development type scope.
46. The settlement hierarchy is proposed for revision and the proposed renaming of 'Small Villages' to 'Local Housing Needs Villages' needs careful consideration. For example, with the growth in employment land and the associated increase

in the number of jobs, families and individuals are likely to relocate into the area and could bring fresh energy and support into a local community.

47. It is also suggested that consideration is given to whether Ashby-de-la-Zouch has a higher role in the settlement hierarchy in the future given the high level of services and facilities that exist in Ashby, and its accessibility off J13 of A42 and linked ability to access key services and facilities in Tamworth, Derby and Nottingham.
48. Given that the proposed Freeport and East Midlands Development Corporation are located on land which includes North West Leicestershire and are significant economic growth initiatives impacting on the County, it is surprising that there is no mention of this within the consultation. There is an expectation that this will be addressed in the next consultation.
49. It is of paramount importance that early engagement and close working is undertaken between the County Council and other partners in the delivery of infrastructure and related proposals to help to mitigate some of the risks that the provision of new school places may bring.
50. It is imperative that any new housing developments contribute to the provision of new school places but given that there is little reference to education provision from new housing development at this stage of the Local Plan, a more detailed response will be provided when the allocated sites list is circulated by NWLDC and information will be required on where expected development sites are located, what types of housing will be built, and the likely commencement date and time frame of completion.
51. In advance of that however, it is suggested that NWLDC considers specific policies within the Local Plan including dealing with the provision and placement of new schools or the significant expansion of existing schools to provide the required additional places from housing developments, and a policy setting out expectations relating to the funding of additional school places and other education infrastructure, such that this mitigates financial risk to the County Council.

Local Plan Review Objectives

52. The eleven objectives as set out are broadly seen as appropriate however given that this Local Plan has the potential to be key in 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, it is recommended that there be a Strategic Objective relating to achieving this transition and setting out what that entails.
53. It is suggested that objectives on health and wellbeing be more aspirational, ideally around improving health and/or reducing health inequality given some of the sizeable inequalities in North West Leicestershire. There may also be opportunity to reference 'best start in life/childhood', which would align to the new Leicestershire Joint Health and Wellbeing Strategy.

54. Objectives should be stronger in respect of the climate emergency and decarbonisation agenda and expanded to refer to the circular economy and the efficient use of resources and minimising waste.
55. It would be beneficial to include a further objective related to ensuring the coordinated delivery of infrastructure required to support growth, whilst there is a notable absence of objectives related to the expansion of East Midlands Airport and Freeport proposals.
56. Objectives do not refer to tourism or the visitor economy specifically and should be included, with reference to improving and increasing the number of assets to attract and more visitors, with the associated benefits particularly in respect of health and wellbeing.

Settlement Hierarchy

57. There appears to be no alignment of the proposed hierarchy with the Strategic Growth Plan 'International Gateway', as development in this area is likely to transform the nature of the area and the economic /transport connectivity relationships within in it, and more widely. 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 Local Plan.
58. It is suggested that Ashby-de-la-Zouch should be considered at a higher level in the settlement hierarchy as its nature is more akin to that of Coalville than Castle Donington, particularly given the high level of services and facilities that exist in Ashby and its accessibility off J13 of A42 with linked ability to access key services and facilities in Tamworth, Derby and Nottingham.
59. It should be noted that where a settlement is classed as a 'Sustainable Village' this does not necessarily mean that it is a location suitable for all types of development, nor that developer contributions would not be required towards the enhancement of sustainable transport measures.

Housing and Development Strategy Options

60. The interim conclusions that the District Council has come to in the absence of certainty in respect to national policy and redistribution of unmet housing need from Leicester being agreed by Leicester and Leicestershire partners, seems reasonable and considered.
61. From a point of view assessing requirements for and planning for the delivery of future highways and transport needs, it is easier to develop transport evidence and to identify required infrastructure and measures based on figures that provide for the City's unmet need from the outset, relative to undertaking assessment and planning work on an initial set of housing numbers which, at some future date, have to be updated to provide for the unmet need. However,

Option 7b (directing growth to a Principal Town (1,785 dwellings), New Settlement (1,785 dwellings), Key service Centre (765 dwellings), Local Service Centre (510 dwellings) and Sustainable Villages (255 dwellings)), represents a continuation of the existing strategy with the addition of a new settlement, offers most flexibility when taking into account possible redistribution of unmet need from Leicester City.

62. Given the various references in the consultation document to the Strategic Growth Plan, it is perhaps surprising that no consideration is given to the 'International Gateway' in developing and assessing the potential options of future housing distribution. It will be important to ensure an overall, coordinated strategy-led approach to the consideration of and planning for growth, including to seek to ensure a coordinated and balanced approach to the provision of housing, jobs, services and facilities across the area.
63. Inclusion of a specific policy on self-build and custom housebuilding is supported and is a key element of the Government's agenda to increase supply of housing and gives more people the opportunity to build their own home. However, if significant quantities of custom/self-build plots are to be included as part of wider allocations/permitted development sites, this will need to be taken into account in setting trigger points for infrastructure delivery and/or contributions. NWLDC will also need to be aware that such self-build and custom housebuilding schemes may still generate the need for a contribution towards the provision of new school places.
64. In reference to space standards, the inclusion of a specific policy is favoured as a lack of internal space and overcrowding is associated with negative implications on mental wellbeing, psychological safety and health outcomes.
65. The policy on accessible and adaptable housing is welcomed. Ensuring that future housing stock in the District is able to accommodate the increase in demand for accessible and adaptable housing has obvious public health benefits. If people are able to stay in their own (suitable) homes for longer it positively impacts on physical and mental health and supports healthy ageing, one of the priorities within the new Leicestershire Joint Health and Wellbeing Strategy.
66. Given the anticipated rise in persons requiring such adaptability in homes in future years, there is support for the policy ensuring wheelchair adaptable dwellings also applies to market housing.

Employment and Development Strategy Options

67. Given that this Local Plan has the potential to be key to the transition of 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).

68. The preferred option for ensuring a continuity of employment land supply is to identify reserve employment site/s (Option 1). This would help to provide certainty and allow NWLDC control over site selection rather than leaving it to the market. It could also be appropriate to consider a combination of options, so identifying reserve employment site/s *plus* increase employment requirement figures given the Authority's understanding that the Freeport proposal is highly likely to accelerate demand for and delivery of employment sites. It would seem sensible to consider whether a policy approach should be adopted that supports the further expansion of employment provision in that area that is genuinely able to be served by the East Midlands Gateway Strategic Rail Freight Interchange as part of its logistic chain. This would help to maximise sustainability/ minimise additional HGV trips on the wider highway network.
69. All potential development strategy options for employment should have regard to mineral and waste safeguarding areas as set out in the Leicestershire Minerals and Waste Local Plan (adopted 2019). This would ensure that sustainable mineral and waste management within the County is not compromised by other forms of development or that any other development is adversely affected by existing minerals or waste management facilities.
70. There is agreement with the initial policy option for strategic warehousing in which 50% of the outstanding road-served requirement is to be met in North West Leicestershire. It is considered an appropriate response given the role of strategic warehousing in the District.
71. With regards local employment, Policy Option 2 to require local employment initiatives in new, large scale developments is preferred. There may be scope for flexibility however, if a business offers to include work placements and apprenticeships, rather than paid employment.

Health and Wellbeing

72. A standalone health and wellbeing policy is supported to allow for need, evidence-based action and recommendations to be clearly and concisely explored for those assessing the Local Plan and the community that it serves. If embedded throughout the Local Plan in small parts rather than as a standalone policy it provides opportunity for health, as a key component especially important to North West Leicestershire and its aims, to be diluted or weakened.
73. From a strategic transport perspective, it is suggested that it would be beneficial to explicitly reference provision of walking and cycling infrastructure designed where appropriate to Local Transport Note 1/20 as part of new development, both in terms of on-site and off-site provision. It is also suggested that the Policy should be expanded to reflect mental health, in e.g. in respect of social isolation.
74. Whilst green infrastructure is noted, the wider benefit of green spaces should have a stronger emphasis on the role it plays towards health and wellbeing, most notably mental and physical health.

75. The proposed Option 3 to 'require a form of Health Impact Assessment (HIA) for planning proposals that meet a specified threshold, including the use of a Health Impact Screening Statement as a systematic way of deciding whether a full HIA is required' is supported as it is the most viable and will result in potential improvements in health inequalities and healthy life years and a reduction in health inequalities within North West Leicestershire. HIAs will also have a positive impact on families moving into the new developments.

Renewables and Low Carbon

76. There is broad agreement with the proposed renewable energy policy however there is no mention of avoidance of harm to habitats or species only mitigation and enhancement.
77. The policy approach to the Lifecycle Assessment is understood and seems appropriate. However, if the intention is that Lifecycle Carbon Assessments should include highways and transport infrastructure associated with new developments, then this would become very wide ranging and complex; it is not clear how and where this would align with the planning application process nor current 'traditional' highway adoption processes; and would likely require additional training for Local Highway Authority officers.
78. With regards to the proposed policy for reducing carbon emissions, references to carbon and material efficiency should be strengthened and expanded upon and there should be greater emphasis on the use of materials already on site or from the deconstruction of buildings/elsewhere. There are sections on water efficiency but not enough on resource efficiency which is a topic in its own right. Additionally, there should be reference within the policy to incorporating infrastructure/technology required to support decarbonisation of transport, including electric vehicle charging points.
79. The wider role of green spaces and ecosystem services for carbon sequestration should have a stronger emphasis, in helping to offset carbon emissions.
80. There is agreement with the proposed policy for reducing carbon emissions but would encourage NWLDC to take the opportunity to adjust carbon net zero target to 2045.
81. The proposed policy for water efficiency standards is supported, particularly if it gives to opportunity to help lower energy bills as fuel poverty is associated with negative effects on mental wellbeing and stress.

Comments from the County Council as a landowner

82. The proposals limiting development to specific local needs criteria are broadly acceptable but should be caveated in a way that allows small scale infill development within the limits of development to be brought forward on an opportunity basis where no local identifiable need exists.

83. In terms of the level of housing growth, given the potential scale of shortfall for Leicester City amounting to some 18,000 dwellings, the 'High 2' scenario of 730 dwellings a year would appear to represent the most appropriate option at this stage, making suitable provision to enable the Local Plan to deal with unmet needs when the distribution is agreed between the HMA authorities. It is also important that the Local Plan allows for general flexibility to deal with changing circumstances and this allowance for flexibility should be reflected in the level of housing proposed.
84. The approach of considering a number of delivery options that can be tested through the Sustainability Appraisal is supported and the locational strategy (Option 7B) provides the greatest potential for some additional housing growth in a range of settlements, supporting the ongoing delivery of services and sustainability and therefore should be supported as the most appropriate distribution option.
85. It is agreed that housing should meet Nationally Described Space Standards as a minimum subject to the proviso that any impact on the viability of the scheme does not act as a constraint on delivery. Equally, the introduction of space standards could be phased in a way that allows market forces to determine land values that take account of their introduction.
86. The draft policy of ensuring all housing meets current Building Regulation standards is logical as is the need for a proportion of the dwellings to be wheelchair friendly.
87. In terms of development strategy options for employment, the Option 3 land strategy would provide greater opportunities for employment development across a range of settlements and is therefore supported. Provision should also be made for start-up and business development space to be provided in order to stimulate the local economy.
88. The proposed Strategic Warehousing policy is seen as very much an interim measure until such time as current needs have been accurately assessed. However, when determined, the needs figure should be increased by a minimum of 10% to reflect the attractiveness of the district for strategic warehousing and provide the Local Plan with greater resilience.
89. The deletion of existing Policy Ec2(2), which applies to proposals for employment development on unidentified sites in the countryside, is supported as applications for new employment floorspace on sites which are not allocated in the Local Plan would be considered against the strategy/general policies contained in the Local Plan Review and this would provide greater flexibility.
90. A policy to support the provision of start-up space to support small businesses on suitable sites and a policy that would allow start-up premises as an exception on sites where development would normally be restricted is encouraged for the development of rural businesses and the rural economy.

91. Large scale housing sites should be collocated with employment potential allocations should be considered on an individual basis taking account of the availability of employment nearby or the need to travel if none exists with appropriate site-specific requirements linked to any allocation.
92. Proposed policies and approaches regarding renewables and low carbon are broadly supported and opportunities to enforce and maximise standards on renewable energy and efficiency should be sought, though it should be noted that in respect of additional considerations for wind energy developments it is considered that the requirement for local community support at paragraph 3b) of the draft policy will act as a constraint to the delivery of otherwise policy compliant schemes and thereby limit the ability to meet the proposed production targets.

Equality and Human Rights Implications

93. There are no equality and human rights implications arising from the recommendations in this report. NWLDC is working with the County Council and with other partners in the Leicester and Leicestershire HMA to provide for the homes and jobs required in the future.

Environmental Implications

94. The County Council will continue to work closely with NWLDC and other partners to minimise the impact planned growth has on the environmental assets of Leicester and Leicestershire.
95. The impact upon the environment is a key consideration in all planning decisions made within the context of an approved or emerging Local Plan, and the County Council will seek to ensure that opportunities are taken to enhance the environment through biodiversity net gain and sustainable forms of development.
96. The County Council works closely with the Leicester and Leicestershire Strategic Planning Partnership, which includes NWLDC, the County Council, Leicester City Council, the other six district councils in Leicestershire and the Leicester and Leicestershire Enterprise Partnership. A strengthening of partnership working is being achieved through the Growth Collaboration Agreement which will assist with the transport challenges which require a strategy led approach with multiple partners in the District and wider area.

Background Papers

Report to full Council on 6 December 2017: Strategic Plan and Single Outcomes Framework

<http://politics.leics.gov.uk/ieListDocuments.aspx?CId=134&MId=5104&Ver=4>

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

<http://politics.leics.gov.uk/ieListDocuments.aspx?CId=135&MId=4603&Ver=4>

Minutes of the County Council meeting held on 15 May 2019 (10 (a) Climate Emergency)

<http://cexmodgov1/ieListDocuments.aspx?CId=134&MId=5112>

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

<http://politics.leics.gov.uk/ieListDocuments.aspx?MId=5999>

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

<http://politics.leics.gov.uk/ieListDocuments.aspx?MId=6444>

Report to the Cabinet on 19 November 2021: Leicester and Leicestershire Authorities- Statement of Common Ground Relating to Strategic Warehousing and Logistics Need

<https://politics.leics.gov.uk/ieListDocuments.aspx?MId=6448>

Appendix

Leicestershire County Council Officer Comments on North West Leicestershire District Council's Development Strategy and Policy Options Consultation

This page is intentionally left blank