

**APPENDIX**

**North West Leicestershire District Council Development Strategy and Policy Options Regulation 18 Local Plan Consultation**  
**Leicestershire County Council Officer Comments (March 2022)**

**Note: The composite views from the Children and Family Service are contained in their entirety in Question 26 and should be noted in conjunction with all other comments.**

|                                     | Questions  | Comments  |
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| <b>Local Plan Review Objectives</b> |  |   |
| 1.                                  | Do you agree with these Local Plan Review Objectives? If not, why not? | <p>Broadly speaking there are no significant issues with the proposed objectives and they provide the basis of a positively prepared policy compliant plan, however there is scope for expansion.</p> <p>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 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. Additionally, it would be beneficial to include a further objective related to ensuring the coordinated delivery of infrastructure required to support growth. E.g. <i>“Ensure the coordinated delivery of infrastructure required to enable the delivery of new development, including to help to mitigate the cumulative impacts of growth (which may in some cases be cross-boundary).”</i></p> <p>There are a range of objectives covering social, economic and environmental elements, however it is suggested that the objectives should be stronger in respect of the climate emergency and decarbonisation agenda. Whilst there should also be reference to the importance of tourism and hospitality and increasing the number of assets to attract more visitors. It is also queried as to why there is no mention of policies to deal with expansion of the Airport and proposed Freeport.</p> <p>More specifically, the wording of Objective 1 is unclear and should be more aspirational. Using ‘promote’, ‘improve’ or ‘enhance’ instead of ‘enable’ is suggested and there could be additional text around improving health and/or reducing health inequalities - there are sizeable inequalities within NWL based on deprivation around life expectancy (almost 10 years): <a href="https://fingertips.phe.org.uk/profile/health-profiles/data#page/7/gid/1938132696/pat/6/par/E12000004/ati/201/are/E07000134/iid/90366/age/1/sex/1/cat/-1/ctp/-1/yr/3/cid/4/tbm/1/page-options/car-do-0_ine-yo-3:2018:-1:-1_ine-ct-71_ine-pt-0">https://fingertips.phe.org.uk/profile/health-profiles/data#page/7/gid/1938132696/pat/6/par/E12000004/ati/201/are/E07000134/iid/90366/age/1/sex/1/cat/-1/ctp/-1/yr/3/cid/4/tbm/1/page-options/car-do-0_ine-yo-3:2018:-1:-1_ine-ct-71_ine-pt-0</a></p> <p>Regarding Objective 7, is there an opportunity for the district to become carbon neutral by 2045, rather than 2050, in line with the County Council?</p> <p>Objective 10 could be expanded to refer to the efficient use of resources and minimising waste in a much wider sense e.g. the circular economy which captures all materials within its scope and not just those in the context of waste linked with minerals and land development.</p> <p>Within Objective 11 <i>‘Maintain access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural</i></p> |

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|  |           | <p><i>facilities, communication networks and health &amp; social care and ensure that development is supported by the physical and social infrastructure the community needs and that this is brought forward in a co-ordinated and timely way’, this List could be expanded to include libraries.</i></p> <p>There may also be an opportunity to include a ‘best start in life/childhood’ type objective into one these 11 objectives. This would align to the new Leicestershire Joint Health and Wellbeing Strategy. Key areas of focus for child health in this district include:</p> <ul style="list-style-type: none"> <li>• increasing the levels of GCSE attainment rates – currently 43.9 % attainment (average attainment 8 score) lower than the regional and national average.</li> <li>• Percentage of breastfeeding initiation currently 65.7% lower than regional value (69.7) and national (74.5)</li> </ul> <p>(<a href="https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E07000134.html?area-name=North%20West%20Leicestershire">https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E07000134.html?area-name=North%20West%20Leicestershire</a> )</p> <p>Finally, paragraph 2.2 could reference that since the North West Leicestershire Local Plan was adopted in November 2017 the Leicestershire Minerals and Waste Local Plan was adopted in 2019.</p> |

**Settlement Hierarchy**

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| 2. | Do you agree with the proposed settlement hierarchy? If not, why not? | <p>Given that this Plan has the potential to be key 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 ‘International Gateway’ (IG).</p> <p>Development in the IG area is likely to transform the nature of the area and the economic /transport connectivity relationships within in it and likewise such relationships more widely across Leicestershire and south Derbyshire and Nottinghamshire. (The relationship with place of living and place of work being one example.) 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>There should be consideration of whether Ashby-de-la-Zouch should have a higher role in the settlement hierarchy (either as a Principal Town or Main Key Service Centre) given the high level of services and facilities that exist in Ashby are more akin to that of Coalville than Castle Donington, and its accessibility off J13 of A42 with linked ability to access key services and facilities in Tamworth, Derby and Nottingham.</p> <p>For the avoidance of doubt, 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 from a highways and transport perspective, nor that developer contributions would not be required towards the enhancement of sustainable transport measures.</p> <p>A clear hierarchy is beneficial in continuing feelings of settlement and attachment to a particular area – more invested in creating links with the community. When people feel settled in an area it creates ontological security – this has a positive impact on a person’s psycho-social wellbeing. Hiscock et al argues that people need ontological security ‘in order to live happy and fulfilled lives’ (Hiscock et al 2001). This is also useful in terms of community cohesion and sense of ‘belonging’ which is associated with self-rated health at all ages and reducing mental health</p> |
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|   |   | inequalities (Camilla et al 2020, Green et al 2019).   |
| 3.  | Do you agree with the approach to Local Housing Needs Villages? If not, why not?  | <p>With regards 'Local Housing Needs Villages', the intent is understood but this needs careful consideration. For example, with the growth in employment land and the associated increase in number of jobs, families and individuals are likely to relocate into the area and could bring fresh energy and support into a local community.</p> <p><i>Comments from the County Council as a landowner</i></p> <p>The proposals limiting development to specific local needs criteria are 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 local need exists.</p>  |
| <b>Development Strategy Options for Housing</b> |   |  |
| 4.  | Do you agree with our proposed approach to the amount of housing growth at this time? If not please explain why, including any specific evidence you think is relevant. | <p>The interim conclusions that the district has come to for housing growth under the High 1 and High 2 scenarios, in the absence of certainty in respect to the unmet need of Leicester City's housing seems reasonable and considered.</p> <p>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.</p> <p><i>Comments from the County Council as a landowner</i></p> <p>For the scale of housing to be planned for over the plan period to 2039, options considered range from 368 dwellings a year as the low scenario based on the standard method, to 730 dwellings a year as the 'High 2' scenario. The low scenario makes no provision for Leicester's unmet needs. For the 'High 2' scenario, a buffer of 362 dwellings a year above the standard method figure would be potentially available for unmet needs, with a need to allocate sites for an additional 5,000 dwellings. Under the 'High 1' scenario of 512 dwellings a year there would be a buffer of 144 dwellings per annum and a need for further allocations to provide 944 dwellings.</p> <p>For housing growth the preferred options are the High 1 or High 2 scenarios as they cover the most likely future requirements until such time as the redistribution of Leicester's unmet needs has been agreed. Accordingly, 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 plan to deal with unmet needs when the distribution is agreed between the HMA authorities. It is also important that the plan allows for general flexibility to deal with changing circumstances and this allowance for flexibility should be reflected in the level of housing proposed.</p> |
| 5.  | Do you agree with our proposed  | There is broad agreement with this approach and the logical, well-reasoned and clear explanation given. Option 7b represents a continuation of the existing strategy (with strong track record) with the addition of a new settlement and offers most flexibility when taking into account possible redistribution of unmet need from Leicester City.  |

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|  | <p>approach to the distribution of housing growth at this time? If not please explain why, including any specific evidence you think is relevant</p> | <p>As a general comment, 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' (IG) in developing and assessing the potential options of future housing distribution.</p> <p>It will be important to ensure an overall, coordinated strategy-led approach to the consideration of and planning for growth in the IG, including to seek to ensure a coordinated and balanced approach to the provision of housing, jobs, services and facilities across the area. This is in the best interests of seeking to deliver growth that is as sustainable as possible (in transport terms); as self-contained (from a travel perspective) as possible; and in seeking to coordinate the identification, funding and delivery of the transport measures and infrastructure required to enable the growth. Considering a particular site in isolation (whatever its scale) would otherwise make it challenging to assess likely levels of sustainability and self-containment other than based on its current locational context (e.g. it's assessed as a 'remote' location because in the present circumstances there is a lack of nearby jobs, services and facilities and/or sustainable transport provision) and is likely to result in a fragmented and disjointed approach to the identification and delivery of transport measures and infrastructure. In other words, a site that might be considered to be unsuitable from a transport perspective when viewed in isolation, might be considered more favourably when viewed in the context of an overall strategy for growth in or across a particular area, such as an overall strategy for growth in the IG area.</p> <p>More specifically, it is noted that the Option 7b to be taken forward includes a 'New Settlement' of 1785 dwellings. It is recognised that this might be of a scale that is appropriate to the timeframe of the Local Plan (i.e. in terms of housing requirement numbers and what is likely to be practically delivered with the new Plan's lifetime), but nevertheless it will be important that any new settlement is of a scale that ensures it will contain a range of economic and social services and facilities that means it is likely to function as a true 'free standing'/largely self-contained community; a development of 1785 dwellings is unlikely to be of sufficient scale in this regard. If of smaller scale, any new settlement should be located close to existing urban areas (and associated services and facilities) in locations accessible via sustainable modes of travel, as opposed to becoming a car-oriented dormitory housing estate.</p> <p>Bringing together the comments about the IG and the scale of any 'New Settlement', it may be appropriate to consider whether a separate Supplementary Development Plan (SDP) document is required, providing a strategic framework that sets out the overall vision and strategic masterplan for the IG area. Within the framework provided by any such SDP, the new Local Plan and its successors could then bring forward allocations and policies that deliver their own respective elements of the overall strategy. Whilst such an approach would not fully address the risk of early phases of development in the IG area perhaps not being as 'sustainable' and 'self-contained' as might ultimately be possible, nevertheless it would provide a robust platform: for the identification of the overall service and infrastructure needs of the IG area; for seeking to deliver the required infrastructure in 'one go' wherever possible; and for maximising opportunities for securing developer contributions and ensuring their most effective use.</p> <p>Regarding Para 4.27, the Sustainability Appraisal has regard to minerals and waste safeguarding under SA17 which states, 'Ensure minerals deposits and sites allocated for waste management are not sterilised through inappropriately located development'. However, the traffic lighted criteria only have regard to mineral safeguarding areas and not those waste sites which are safeguarded in the Leicestershire Minerals and Waste Local Plan (adopted 2019). Whilst we are working on the production of a waste safeguarding layer for GIS use, the criteria should still refer to waste safeguarding as it is spatially assessable from our Local Plan. This would ensure that sustainable waste management within the</p> |

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|                |   | <p>county is not compromised by other forms of development or that any new residential, or other, development is adversely affected by existing waste management facilities.</p> <p><u>Comments from the County Council as a landowner</u></p> <p>The approach of considering a number of delivery options that can be tested through the Sustainability Appraisal is supported.</p> <p>Coupled with the High 2 scenario, the 'Option 7b' locational strategy proposes to distribute development to the Coalville Urban Area (1,785 dwellings) a new settlement (1,785 dwellings), Key Service Centres (765 dwellings), Local Service Centres (510 dwellings) and Sustainable Villages (255 dwellings). This distribution option 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.</p>   |
| <b>Housing</b> |   |  |
| 6.             | Do you agree with the proposed self-build and custom housebuilding policy? If not, why not? | <p>There is agreement with inclusion of specific policy but there could be an opportunity to specify the provision for self-build and custom housebuilding plots.</p> <p>If significant quantities of custom/self-build plots are to be included as part of wider allocations/permitted development sites (as proposed through the draft policy), it will be important to ensure that this is taken into account in setting trigger points for infrastructure delivery and/or contributions – i.e. if reaching a trigger point is reliant on delivery of at least some self/custom build housing, there could be an increased risk that this will never happen? Conversely exclusion of self/custom build housing from the setting of trigger points could mean a considerable number of new homes coming forward without the delivery of the necessary infrastructure/contributions being triggered for the site as a whole.</p> <p>It is suggested that it would also be beneficial if either via this policy or via the general carbon reduction policy it is stipulated that custom built houses are sustainable and include infrastructure necessary for the future such as electric charging points.</p> <p>The District Council also needs to be aware that such schemes may still generate the need for a contribution towards the provision of new school places.</p> <p><u>Comments from the County Council as a landowner</u></p> <p>The delivery of self-build and custom houses is accepted. It is noted that the draft policy appears positive in its approach but importantly incorporates the proviso that deals with a lack of demand on larger sites enabling market housing to be delivered after a suitable period of marketing.</p> |
| 7.             | Do you agree with the proposed policy   | <p>It is agreed that there should be the inclusion of a specific policy but policy wording could include 'change of use' as well as conversions.</p> <p>This approach is important as a lack of internal space and overcrowding is associated with negative implications on mental wellbeing,</p>  |

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|    | on Space Standards? If not, why not?  | <p>psychological safety (due to a lack privacy/personal space) and health outcomes (<a href="https://www.hatc.co.uk/wp-content/uploads/GLA_Space_Standards_Report.pdf">https://www.hatc.co.uk/wp-content/uploads/GLA_Space_Standards_Report.pdf</a>) Space shortage is also linked to lower educational attainment (overcrowding impacts on concentration levels, increase noise, lack of space to study). An Increase in internal space is linked to significantly reduced family tensions (University of Glasgow SHARP project) working from home more likely than ever before due to Covid-19. Maintaining the space standard will alleviate the negative health consequences associated with lack of space (<i>Ade Kearns (2022) Housing space and occupancy standards: developing evidence for policy from a health and wellbeing perspective in the UK context, Building Research &amp; Information, DOI: <a href="https://doi.org/10.1080/09613218.2021.2024756">10.1080/09613218.2021.2024756</a></i>)</p> <p>It is important to note that there are likely to be other factors also that could impact on land supply, including the impacts of the Government's most recent cycle infrastructure design guide, Local Transport Note 1/20 and its general encouragement for segregated cycle routes. A reference to this would be good.</p> <p><i><u>Comments from the County Council as a landowner</u></i></p> <p>It is agreed that housing should meet NDSS 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.</p> |
| 8. | Do you agree with the proposed policy on accessible and adaptable housing? If not, why not? | <p>The proposed policy on accessible and adaptable housing is agreed.</p> <p>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. To expect this of all housing will therefore positively impact health and wellbeing across the lifecourse and support healthy ageing, one of the priorities within the new Leicestershire Joint Health and Wellbeing Strategy.</p> <p><i><u>Comments from the County Council as a landowner</u></i></p> <p>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.</p>  |
| 9. | Should part M4(3)(a) wheelchair adaptable dwellings also apply to market housing? If not,   | <p>M4(3)(a) wheelchair adaptable dwellings should also apply to market housing given the anticipated rise in persons requiring such adaptability in homes in future years.</p> <p><i><u>Comments from the County Council as a landowner</u></i></p> <p>In respect of market housing the proportion of housing that is required to meet M4(3)(a) should be no greater the need identified within the housing needs assessment for the District and take account of the level of provision delivered through affordable housing and supported housing</p>   |

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|  | why not?  | schemes delivered across the overall scheme.  |
| <b>Development Strategy Options for Employment</b> |   |   |
| 10.  | Which option for ensuring a continuity of employment land supply do you prefer? Is there a different option which should be considered? | <p>Prefer Option 1 to identify reserve employment site/s as it would help to provide certainty and would provide NWLDC with control over site selection rather than leaving to the market.</p> <p>It could also be appropriate to consider a combination of options, so identify reserve employment site/s <b>plus</b> increase employment requirement figure given we understand the Freeport proposal is highly likely to accelerate demand for and delivery of employment sites.</p> <p>Given that this Local Plan has the potential to be key 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, 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>Additionally, the drive to decarbonise transport will, to some degree, be an influencing factor on delivery and sites, too. The electrification of Light, Medium and Heavy Goods vehicle fleets during the lifetime of the Local Plan could, potentially, render some existing employment locations as obsolete (e.g. because of an inability to provide sufficient power supply/charging facilities and/or the 'last mile' is too long for an electric HGV once it has left the Strategic Road Network) or temporarily redundant (e.g. whilst issues of power supply, 'last mile' HGV operation are addressed).</p> <p>How the provision of appropriate power infrastructure is provided to enable growth may need to be a consideration in the new Local Plan in this regard.</p> <p>In addition, it is not clear how the Freeport proposals have influenced thinking in respect of the new Local Plan.</p> <p>With regard to each of the specific potential policy options:</p> <ol style="list-style-type: none"> <li>1. Identify reserve site(s): If this approach is adopted, it is important that any 'reserve sites' are assessed from a transport perspective as if they are full allocations, to ensure that any site specific and/or additional cumulative transport impacts/infrastructure requirements arising as a result are identified and addressed through the Local Plan.</li> <li>2. Increase requirement figures by a factor: No particular comments from a strategic transport perspective.</li> <li>3. Await the next review of the Local Plan: Potentially misses the chance to identify any additional cumulative transport impacts/infrastructure requirements arising as a result and to build this into the Local Plan at the earliest opportunity. Having to 'retrofit' for such additional requirements at a later stage could prove more costly and disruptive in the long run.</li> <li>4. Rely on Policy Ec2(2) or its equivalent: This does not appear to be a preferable approach, for the reasons given in the document and also with regards to our wider comments in response to this question.</li> </ol> <p><i><u>Comments from the County Council as a landowner</u></i></p> |

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|     |  | Subject to there being sufficient land supply available to meet the next 5 years requirements the final choice of option could be delayed until the Statement of Common Ground has been agreed identifying the level of Leicester City's unmet need that will be delivered within NWL.   |
| 11. | Which general employment land strategy option do you prefer? Is there a different option which should be considered? | <p>See also response to Q10.</p> <p>Additionally, as a general comment given that the East Midlands Gateway Strategic Rail Freight Interchange (SRFI) facility is now complete and open for business, 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 <i>genuinely able</i> to be served by the SRFI as part of its logistic chain. This would help to maximise sustainability/ minimise additional HGV trips on the wider highway network. Should further growth in this area be considered, then the comments in respect of the Strategic Growth Plan International Gateway (IG) made in response to Q5 apply, i.e. It will be important to ensure an overall, coordinated strategy-led approach to the consideration of and planning for growth in the IG.</p> <p>Option 1 – No particular comments from a strategic transport perspective.</p> <p>Option 2 – M42 J11 is much more isolated/remote from major settlements than established major employment areas across the district, and therefore likely to be significantly more car dependent/less 'sustainable' in transport terms. It also lacks the established infrastructure/benefits of the East Midlands Gateway area for strategic logistics, including the SRFI facility, meaning any additional logistics operations in the J11 area would be entirely HGV dependent. Finally, the specific opportunities for development in and around the M42 J11 are likely to be restricted by the planned HS2 Phase 2B 'East Midlands Spur', the preferred route of which is immediately to the east of the M42/A42, cutting across a number of potential employment sites that have previously been put forward through the SHELAA. Having said that, conversely this location may be suitable for consideration of a 'lorry park' (see response to Q26).</p> <p>Option 3 – This does not appear to be a particularly attractive option in transport terms – a scattered/ piecemeal approach is likely to result in impacts on less suitable parts of the highway network which could be harder to mitigate in transport terms and provide fewer opportunities for sustainable travel.</p> <p>Option 4 – No particular comments from a strategic transport perspective.</p> <p>All options 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.</p> <p>Overall preference for Option 1 concentrating development in Coalville, Castle Donington and Ashby or Option 2 but include Measham/Appleyby. Issues are already being faced with getting employees to site by limited public transport and if locations are dispersed beyond the main settlements this will make it worse.</p> |

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|                   |  | <p><u>Comments from the County Council as a landowner</u></p> <p>For employment options, whilst not consistent with the Stantec Study, 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. As occupiers are often unable to provide a significant track record this sector relies on niche providers willing to deliver dedicated schemes for the delivery of smaller starter units as well as a requirement within larger schemes.</p> |
| 12.               | Do you agree with the initial policy option for strategic warehousing? If not, why not?  | <p>See also response to Q.10 and Q.11 but agree and consider it an appropriate response given the role of strategic warehousing in NWL.</p> <p><u>Comments from the County Council as a landowner</u></p> <p>From a strategic property perspective, the proposed 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 plan with</p>  |
| <b>Employment</b> |  |   |
| 13.               | Which policy option for employment land proposals on unidentified sites do you prefer? Is there a different option which should be considered? | <p>See also response to Q.10 and Q.11 regarding potential employment provision in the vicinity of the East Midlands Gateway Strategic Rail Freight Interchange.</p> <p>Prefer Option 4 (or possibly Option 8 which is a combination of options 3 to 7) as this option ensures other suitable sites are explored with reasons given if they are discounted before an unidentified site could be deemed acceptable.</p> <p><u>Comments from the County Council as a landowner</u></p> <p>Option 1 is preferred as it provides the plan with greater flexibility</p>   |
| 14.               | Which policy option for start-up workspace do you prefer? Is there a different option which should be considered?                              | <p>Support Option 4, but if this is unlikely to result in significant additional start up floorspace prefer Option 5 to allow start up premises as an exception on sites where development would normally be restricted</p> <p>If a new settlement is to be favoured as a development option, then some specific 'start up' provision may be needed as part of the employment provision for such a site, to ensure residents looking to start a business have 'on site' options rather than being forced to look/travel further afield (which would increase car-dependence).</p>   |

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|                             |  | <p><u>Comments from the County Council as a landowner</u></p> <p>Options 4 and 5 are preferred as they support both start-up units and, in the case of Option 5, encourages the development of rural businesses and the rural economy.</p>   |
| 15.                         | <p>Which policy option for local employment do you prefer? Is there a different option which should be considered?</p> | <p>Option 2 ideally, as it provides the opportunity to engage with and influence employers at the early planning application stage, though acknowledge the difficulties with policy implementation. Recommendations and encouragement will only hold so much sway. Local employment is important to the prosperity of the local area, and due to reduced travel miles and therefore increased active travel options, can also impact on air quality and physical and mental health, if planned and executed well.</p> <p>Skill development is also a key wider determinant of health and contributes to a concept known as ‘Good Work’. Good Work contributes to the health of employees, and healthy employees are more productive, improving economic prosperity of the area. A positive cycle for both residents and employees. There may be opportunity for wording to be added in regard employers who promote health and wellbeing of their staff, as well as skill development. Public Health are developing and widening the current offer to allow for more areas of support (i.e. financial wellbeing, wider mental health offer) and also so it supports more sizes of businesses in more sectors.</p> <p>As stated, option 2 also offers the potential for commuting incentives and potentially could bring down the 92% of commuting journeys by car to be in the line with the national rate of 78%.</p> <p>(Nb NWL has the lowest employment average rank vs other 6 districts when reviewing IMD data)</p> <p>From a strategic transport perspective, aside from economic and general benefits to peoples’ lives, a policy that seeks to encourage/support the employment of people local to business brings about the greatest opportunities to minimise the need to travel by private car, with potential environmental benefits.</p> <p><u>Comments from the County Council as a landowner</u></p> <p>On the basis that 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.</p> |
| <b>Health and Wellbeing</b> |  |  |
| 16.                         | <p>Do you agree with the proposed health and wellbeing policy? If not,</p>   | <p>Yes. The previous feedback from emerging options consultation that “such a policy could lead to the duplication of policy as this matter as dealt with throughout the Local Plan” has weaknesses as an argument. If embedded throughout the plan in small parts rather than as a standalone policy it provides opportunity for health, as a key component especially important to NWL and its aims, to be diluted or weakened. A standalone policy will allow you to explore need, evidence-based action and recommendations clearly and concisely for the those assessing the plan and the community that it serves.</p>   |

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|     | why not?   | <p>The policy could also make reference to access to healthy food. This can take the forms of restricting access to unhealthy choices, or also promoting access to sustainable, healthy food through design and the built environment.</p> <p><i>Other suggestions:</i></p> <p>Could the policy include a sentence about creating opportunities for social interactions? As per 92: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-and-safe-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-and-safe-communities</a></p> <p>Consider anything around improving opportunities (reference made in above document) around ‘All children get the best start for life’, a key priority within the New Leicestershire Joint Health and Wellbeing Strategy, and so have access to a good quality education, and everyone has the opportunities they need to fulfil their potential. This could contribute to increasing the levels of GCSE attainment rates – currently 43.9 % attainment (average attainment 8 score for NWL), lower than the regional and national average. Education and skills are key wider determinants of health.</p> <p>Add in a demonstratable outcome that relates to health priorities for the area. For example, reduce the gap in percentage of physically active adults in North West Leicestershire – currently 61.1% which is significantly lower than the regional value of 65.7% and national value of 66.3% (<a href="https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E07000134.html?area-name=North%20West%20Leicestershire">https://fingertips.phe.org.uk/static-reports/health-profiles/2019/E07000134.html?area-name=North%20West%20Leicestershire</a>)</p>  |
| 17. | Do you agree with the proposed Health Impact Assessment policy? If not, why not? | <p>There is agreement that option 3 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, however there needs to be a clear policy on how the proposals are determined.</p> <p>A line could be added around “....any other proposal considered by the council to require one” as it covers other eventualities. There could be additional clarify around some points - Is there anything in place which would prevent the same builder put in multiple applications to come under the 30 limit to avoid HIA? What if multiple &lt;30 applications came in but all concentrated in one area? What if an application came in with a certain proximity to HS2/trainline, or where a health facility had just closed/stopped taking on new patients, or close to a new AQMA?</p> <p>There is a simple, accessible solution for screening for a HIA that has been built on the LLR Healthy Placemaking Portal: <a href="https://www.healthyplacemaking.co.uk/health-impact-assessment/">https://www.healthyplacemaking.co.uk/health-impact-assessment/</a> developed by Active Together, with content provided by the Leicestershire Public Health Team.</p> <p>The screening tool is a simple form to be filled out based on a DoH template and is fully embedded into the website for ease of use. It has clear sections around what to consider, so that would negate the need to explore this within the Local Plan further, unless you would like to. There is also a set of slides and audio commentary on the why, what’s and how’s of HIA, recorded by a Consultant in Public Health.</p> <p>Use of the screening tool can take away some ambiguity, such as around the statement ‘for developments where the screening assessment</p> |

|                                  | Questions   | Comments  |
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|                                  |   | <p>indicates more significant health impacts, a more comprehensive, in-depth Health Impact Assessment will be required ‘, which could allow subjectivity. The tool allows a more rigorous approach, less open to bias.</p> <p>Screening is a key stage of HIA, it just needs to be managed as some feedback from other areas has been that screening has shown no health impacts from a wide range of developments. If we are also looking at positives in HIA, even these could be recorded and impacts on health and wellbeing explored. This would be a clear way to capture and positives to the community.</p>   |
| 18.                              | <p>Do you agree that the policy should also indicate that an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one? If not, why not?</p> | <p>Agree, could also seek to provide guidance on what these other circumstances could be and more simpler assessments could be used that reflect scale of development</p>   |
| <b>Renewables and Low Carbon</b> |   |   |
| 19.                              | <p>Do you agree with the proposed renewable energy policy? If not, why not?</p>   | <p>It is suggested that NWLDC strive for option 3 rather than option 2 (2045 rather than 2050 target?) to align with the County Council ambition.</p> <p>It might be appropriate to cover accessibility to a site for construction (including for ‘abnormal loads’ as necessary) and future maintenance purposes in the proposed criteria under item 2, especially in respect of sites for wind turbines.</p> <p>The policy should also refer to avoidance of harm to habitats or species, not just mitigation and enhancement.</p> <p>From a public health perspective, there is concern around fuel poverty, which is associated with poor physical and mental health outcomes- energy efficiency measures can reduce financial outgoings – most beneficial for people on lower incomes (Liddell C., C. Morris and S. Langdon (2011), <i>Kirklees Warm Zone. The Project and its Impacts on Well-being</i>, <a href="http://www.kirklees.gov.uk/community/environment/energyconservation/warmzone/ulsterreport.pdf">www.kirklees.gov.uk/community/environment/energyconservation/warmzone/ulsterreport.pdf</a>.</p> <p><i>Comments from the County Council as a landowner</i></p> |

|     | Questions   | Comments  |
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|     |   | The document should be updated to say that it would support opportunities to exceed these targets should the opportunity arise rather than stopping if the targets were met. I think more could be done to look into low-carbon heat forms too and this should be included in the document.   |
| 20. | Do you agree with the preferred policy approach for energy efficiency? If not, why not?           | <p>Agree with the preferred policy approach for energy efficiency as the target demonstrates a proactive approach.</p> <p>Energy efficient policies can positively affect health and wellbeing through reducing the negative impact of fuel poverty. The cost of electricity and gas is rising, due to the global wholesale price of gas increased in 2021, the default energy tariff on gas and electricity has been lifted. Energy bills on average will increase by around £700 per household from April 2022 and could continue to increase going forwards. People are more likely to be working from home and in the house more but due to the increased costs may be at risk of not being able to adequately heat their home.</p> <p>Fuel poverty is associated with negative effects on mental wellbeing and stress. <i>“National Institute for Clinical Excellence (NICE) recognise the profound effects that cold housing can have on health and cite links to health problems, excess winter deaths and reduced quality of life, with the impacts being most acutely felt amongst the vulnerable including the elderly, children, and those with chronic conditions.” (Ambrose et al 2021).</i></p> <p><u>Comments from the County Council as a landowner</u></p> <p>it is far more effective to have mandatory energy requirements for buildings so that this forces higher standards. When voluntary it is too easy for these to be excluded for various reasons.</p> |
| 21. | Do you agree with the preferred policy approach for Lifecycle Carbon Assessment? If not, why not? | <p>The sentiment of the preferred approach is understood. 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.</p> <p>The policy needs to recognise that new methods of assessing carbon may come forward in the future as this becomes more mainstream.</p>   |
| 22. | Do you agree with the preferred policy approach for overheating? If not, why not?                 | Agree with the preferred policy approach as it covers both small and large developments and will become more important in the future as climate change comes into play.   |
| 23. | Do you agree with the preferred policy  | Agree with the preferred policy approach for the climate change assessment of development and seems appropriate and in-line with Q.21 and Q22.  |

|     | Questions  | Comments   |
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|     | <p>approach for the climate change assessment of development? If not, why not?</p>           |  |
| 24. | <p>Do you agree with the proposed policy for reducing carbon emissions? If not, why not?</p> | <p>Agree with the policy on carbon emissions with funding being provided as the last resort option and that other methods are utilised first.</p> <p>Matters under Q.21 also apply here to a certain extent, and there should be reference within the policy to incorporating infrastructure/technology required to support decarbonisation of transport, including electric vehicle charging points.</p> <p>Point 3: <i>'demonstrate actions taken to reduce embodied carbon and maximise opportunities for reuse of materials'</i>; the reduction of carbon is an element of a much larger model, the 'circular economy' of which there is no mention. Any reference to carbon and material efficiency can be strengthened and expanded upon through reference to (for example); the reduction in the volume of materials brought onto site reducing material use, raw material extraction, associated environmental impacts ('externalities') and the transportation of materials to site. A considered supply chain approach by developers could be used to evidence this. There should be greater emphasis on the use of materials already on site or from the deconstruction of buildings/elsewhere; considered material choices to enable materials to stay in use ('cycle') for longer and be passed ('cascaded') to other uses (a second and third life cycle) after they come to the end of their first life cycle. Life cycle design is crucial in facilitating this and ensuring materials can be easily recovered through modular design and the inclusion of less hazardous materials etc.</p> <p>There are sections on water efficiency etc. but not enough on resource efficiency which is a topic in its own right.</p> <p>The wider role of green spaces and ecosystem services for carbon sequestration should have a stronger emphasis, in helping to offset carbon emissions. For e.g. hedgerows, trees etc</p> <p>The Low Carbon Energy Study by AECOM doesn't mention the need to integrate habitat into housing design in relation to achieving Net Zero.</p> <p>Agree with the proposed policy for reducing carbon emissions and would wish to take the opportunity to adjust carbon net zero target to 2045.</p> <p><u><i>Comments from the County Council as a landowner</i></u></p> <p>It is far more effective to have mandatory energy requirements for buildings so that this forces higher standards. When voluntary it is too easy for these to be excluded for various reasons. Concern that by mentioning that off-setting is an option when renewable energy generation is not viable; it can provide an easy way out for builders. This should be strengthened and made more specific to really enforce the use of on-site renewables. Offsetting should only be an option when renewables are not technically feasible. Leaving economic feasibility as a reason leaves it open to interpretation and many will opt to offset instead.</p> |

|                   | Questions  | Comments  |
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| 25.               | Do you agree with the proposed policy for water efficiency standards? If not, why not?                   | <p>The proposed policy for water efficiency standards is agreed but there is also scope to consider water efficiency in change of use and conversions and ambition for water efficiency standards to extend beyond new stock to existing stock (beyond the planning function).</p> <p>From a public health perspective, the policy should ensure it enables opportunity to help lower energy bills and as noted above fuel poverty is associated with negative effects on mental wellbeing and stress. Section 9.67 NWL classification of a 'seriously water stressed' area has obvious concerns around health and wellbeing in long, dry, hot periods, especially for our more vulnerable populations.</p>   |
| <b>Next Steps</b> |  |   |
| 26.               | What additional comments do you have about the Local Plan Review not covered by the preceding questions? | <p>The Local Highway Authority (LHA) is supportive of the Development Plan process; whilst providing for the future growth of Leicester and Leicestershire will be challenging in many regards (including in respect of highways and transport), a Plan-led approach offers the greatest opportunities to address those challenges as compared to seeking to deal with the impacts of ad-hoc, 'unplanned' growth.</p> <p>The LHA would therefore wish to see the successful adoption of a new Local Plan for the district. However, it has had a relatively limited opportunity to input into the Plan's development to date. For example, whilst noting that this draft of the 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 NWLDCs SHELAA sites might have informed the district council's decisions to date.</p> <p>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.</p> <p>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.</p> <p>Given the significance of the logistics sector in the district and the lack of available service facilities on the Strategic Road Network (SRN) in the area, it is suggested that consideration should be given through the development of the Local Plan as to whether land should be identified for a 'lorry park'.</p> <p>It is to be hoped that Government will soon make a decision on proposals for reopening the Ivanhoe Line to passenger traffic, and that this can be appropriately reflected in the new Local Plan.</p> <p>It is expected that the Local Plan will need to contain at least reference commentary to the HS2 Eastern Leg, but policies might also be required.</p> |

|  | Questions | Comments   |
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|  |           | <p>It is also suggested that the Plan should acknowledge early in the document the ongoing Covid-19 pandemic and current uncertainties over the long-term implications this will have on society, including on transport provision and travel behaviour (encompassing trends such as increased home working). It should also look at the roll that the Local Plan has in aiding the area’s recovery.</p> <p>More emphasis could be placed on the provision of future emerging transport technologies within the document to support decarbonisation.</p> <p>With regards Page 55, Some of the Public Health data has been updated in Feb 2022 (i.e. childhood obesity <a href="https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/8000073/pat/6/par/E12000004/ati/201/are/E07000134/yr/3/cid/4/tbm/1">https://fingertips.phe.org.uk/profile/health-profiles/data#page/1/gid/8000073/pat/6/par/E12000004/ati/201/are/E07000134/yr/3/cid/4/tbm/1</a>). It might also a good idea to give specifics of percentages as it helps with accurate comparisons to other areas when using as evidence to back up decisions or potential policies.</p> <p>It isn’t clear what this text means, <i>“Increasing levels of physical activity – Approximately one quarter of adults are not physically active and a further 11% are not meeting Chief Medical Officer guidelines of 150 minutes of physical exercise per week.”</i> If this data is being used: <a href="https://www.active-together.org/researchandvidence/active-lives-adult-survey-may-202021-llr-headlines/download">https://www.active-together.org/researchandvidence/active-lives-adult-survey-may-202021-llr-headlines/download</a></p> <p>It is positive to read that “The Local Plan itself will be the subject of a HIA”. The Leicestershire Public Health team will be delighted to help with this as part of the pilot work with NWL and Blaby to embed health into Planning processes within Leicestershire.</p> <p>With regards Page 60, there is reference to PHE <i>“It is anticipated that the work currently being undertaken with Public Health England, would also provide some form of guidance to assist with the application of the policy.”</i> It needs to be clarified whether this is the Leicestershire Public Health Team? Or if it is PHE they are now a new organisation (OHID).</p> <p><b><u>The following paragraphs set out the Children and Family Service response to the North West Leicestershire Local Plan Review consultation.</u></b></p> <p>Given that there is little reference to Education provision from new housing development, it is difficult to comment on the specifics of what we would require. We expect to be able to provide a more detailed response when the allocated sites list is circulated by NWLDC. Therefore at this stage we wish to highlight to the district education matters that need to be taken into consideration as the Local Plan develops and potential sites evolve.</p> <p>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.</p> <p>Good schools have a significant impact on the communities which they serve. They are at the heart of the community and contribute towards thriving and sustainable areas of housing. Therefore, it is imperative that any new housing developments contribute to the provision of new school places.</p> <p><b><u>Developing additional school places</u></b></p> |

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|  |           | <p>In accordance with the Education Act 1996 the County Council has a statutory duty to ensure a sufficient supply of primary, secondary and post 16 school places. This may be interpreted as a duty to ensure that a school place is available in all localities for every child that needs one and mindful of their specific needs. The County Council also has a duty to ensure the sufficiency of early years and childcare provision under the Childcare Act 2006 and 2016.</p> <p>In the context of the above duty it should be noted that a number of existing schools within the District are currently operating at the upper limit of their site capacity and may not be readily able to provide school places which would arise from the allocation of substantial housing growth, particularly some of the schools in small, villages or rural centres. This might suggest that the Plan should make provision to either secure land for the expansion of schools, if available next to the school site or alternatively consider relocating housing development elsewhere, or in certain circumstances the development of a new school. The District Council are advised to exercise caution when considering the development of new schools as the cost for these may be disproportionate to the scale of development (it should be noted that the County Council is unlikely to be able to meet any funding gaps, unless there is evidence of increasing 'basic need' in the area for which DfE grant may have been secured. Developing new schools may also introduce surplus place capacity if not carefully planned, which will have a bearing to other developments, speculative or otherwise, in the given area.</p> <p>For the avoidance of doubt singular or multiple developments of collectively 700 homes would ensure the viability of a 1 form entry, 210 place primary school, whereas for secondary schools developments would need to comprise circa 4500 homes to justify a 750 place school (excluding post 16 provision).</p> <p>It is noted within the consultation document 4.67 Table 6 that there are two preferred options to be taken forward. Option 3a High 1 scenario of 1,000 dwellings and Option 7b High 2 scenario of 5,100. However, developments of the size described, split over numerous sites may not sustain a new secondary school provision but would have a major impact on existing secondary provision in the NWLDC area. Early discussion regarding potential location of any new settlement would therefore be welcomed to identify potential secondary education and Post 16 requirements and solutions.</p> <p>In terms of SEND provision for pupils having an Education Health and Care Plan (EHCP) it is expected that provision will be attached to existing or new primary or secondary schools in the locality, accepting there will be circumstances where pupils with specialist needs may need to attend schools further afield, and which in some circumstances may be outside of the District.</p> <p>From an Early Years perspective, the DfE encourage provision to be developed as part of new school and placed in each locality to minimise travel and disruption to families. Where such provision cannot be developed on existing or new school sites, or where demand exceeds that which could be met via a school based solution then early years provision should also be considered for community hubs or similar infrastructure.</p> <p>Where new school sites are proposed it is important to ensure that they are placed central to developments they will serve (or at the centre of a single development), in locations that are fully accessible and on sites that are of suitable gradient (avoiding excessive slopes/inclines), well drained, free from excessive noise, light, or air pollutants, so and take maximum benefit from their environments. Further details on site</p> |

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|  |           | <p>suitability for new or expanded schools can be found within the Leicestershire Planning Obligations Policy.</p> <p>Any sites identified for the expansion of existing, or the construction of new schools will need to reflect statutory guidance from the Department for Education regarding statutory available walking route distances from home to school of two miles for primary pupils and three miles for secondary pupils, and County Council policy relating to safe/available routes.</p> <p>It should be noted that introducing further development sites not identified within the Local Plan can sometimes tip the balance when it comes to provision of new schools rather than the provision of additional school places at existing schools, therefore some flexibility should be built into the plan to address this should it occur.</p> <p>It is also crucial that there is flexibility wherever possible around timing of spend from developer contributions to ensure that all monies are spent on the required infrastructure to ensure that school places are delivered in an equitable and coordinated manner.</p> <p><b><i>Proposal 1: It is suggested that NWLDC consider the introduction a policy statement(s) within the Local Plan to deal with the provision and placement of new schools and acquisition/reservation of land for either new schools or the significant expansion of existing schools to provide the required additional places from housing developments.</i></b></p> <p><b><u>Delivery of additional school places</u></b></p> <p>In terms of providing additional school places a number of issues may arise:</p> <ul style="list-style-type: none"> <li>• New schools or significant expansion works will be expected to be progressed in parallel with new housing developments, to ensure that school places are available as new homes are occupied. The County Council will not have capacity to forward fund all new infrastructure works, this therefore places emphasis on developers not only meeting the full cost of all new schools or expansions but ensuring that S106 funds are released at a sufficiently early stage to allow works to progress. If this cannot be achieved then this may introduce a requirement for pupils from new developments to be transported to other schools nearby, in such circumstances the developer would be required to meet not only the costs off transport to alternative schools, but potentially also the costs of additional temporary accommodation if surplus places were not available. The County Council would seek to avoid such circumstances arising given the disruptive impact this will have to families and the continuity of a pupil's education.</li> <li>• It is expected that some new schools or expansions will be dependent on S106 funding drawn from several developments, this could introduce a significant funding risk that either developments do not progress simultaneously or consecutively, or possibly that a particular development does not progress at all introducing a funding gap.</li> <li>• It is known that delivery of the Local Plan will be contingent on the expansion of schools in rural locations, often conservation areas, or on constrained sites, where normal design solutions cannot be applied. In such circumstances it is expected that developers will be required to meet the full costs of construction, and any additional works necessary to mitigate any other planning requirements rather</li> </ul> |

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|           | <p>than the just the cost multiplier.</p> <ul style="list-style-type: none"> <li>The Local Plan consultation makes no reference to the impact of EU exit or the Covid-19 pandemic both of which have contributed towards significant construction cost increases related to labour shortages, materials availability and transport costs. It is too early to say how the construction market may be impacted longer term, this places an emphasis on the importance of frequent review and dialogue between the County and District Councils and other delivery partners to ensure that the full costs of schools development and any expected change to these are fully understood and mitigated for</li> </ul> <p><b><i>Proposal 2: In view of the above it is suggested that the District Council consider including within the Local Plan a policy setting out expectations specifically in relation to the funding of additional school places and other education infrastructure, such that this mitigates financial risk to the County Council.</i></b></p> <p><b><u>Community use of school facilities and sites</u></b></p> <p>The County Council recognises the value of schools as a focus for community use (predominantly outside of school hours and during school holidays). All new schools to be developed as part of the Local Plan delivery will be established as academy (free) schools meaning they will be operated by Multi Academy Trusts (as charitable companies/commercial entities) directly controlled by the DfE. In practice schools will seek to make their facilities available to the community via a standard letting procedure.</p> <p><b><i>Proposal 3: The District Council are therefore advised that is very unlikely that academies will be able to enter into agreements with the District or other organisations regarding shared use or joint management agreements for facilities located on school sites, where such are deemed to present (in view of the Trust, the County Council or the DfE) a financial risk to the effective operation of any school. Such arrangements should therefore be avoided.</i></b></p> <p><b><u>Renewables and low carbon</u></b></p> <p>The County Council policy on Zero Carbon outlines how we will achieve energy efficiencies and our carbon reduction targets.</p> <p>It is therefore expected that the County Councils policy on zero carbon should adequately meet the requirements set out in the Local Plan option 9.54.</p> <p><b><u>Specific Site Allocations</u></b></p> <p>Although specific site details are not referenced in the Local Plan, it is noted that the preferred options provided in the Local Plan consultation in Table 6 under point 4.67 provide enough high-level information for us to provide an indication of the number of new school places that may be required. However, at this early stage without further detail on site specifics and type of dwellings we can provide no further information with regard to capacities in existing schools, whether solutions would be expansions and/or new schools and the developer contributions we would</p> |

| Questions         | Comments  |  |  |              |                                      |  |  |         |     |     |       |           |     |     |       |                 |         |      |       |                   |       |   |      |             |       |    |       |  |                  |                 |     |  |  |     |   |   |     |   |  |
|-------------------|---|--|--|--------------|--------------------------------------|--|--|---------|-----|-----|-------|-----------|-----|-----|-------|-----------------|---------|------|-------|-------------------|-------|---|------|-------------|-------|----|-------|--|------------------|-----------------|-----|--|--|-----|---|---|-----|---|--|
|                   | <p>require from housing developers to provide the new school spaces.</p> <table border="1" data-bbox="436 204 1617 756"> <thead> <tr> <th data-bbox="436 204 741 408"><i>Phase</i></th> <th data-bbox="741 204 983 408"><i>Pupil Yield Per 100 Dwellings</i></th> <th data-bbox="983 204 1305 408"><i>Option 3a 1,000 Dwellings School Places Generated</i></th> <th data-bbox="1305 204 1617 408"><i>Option 7b 5,100 Dwellings School Places Generated</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="436 408 741 480">Primary</td> <td data-bbox="741 408 983 480">0.3</td> <td data-bbox="983 408 1305 480">300</td> <td data-bbox="1305 408 1617 480">1,530</td> </tr> <tr> <td data-bbox="436 480 741 552">Secondary</td> <td data-bbox="741 480 983 552">0.2</td> <td data-bbox="983 480 1305 552">200</td> <td data-bbox="1305 480 1617 552">1,020</td> </tr> <tr> <td data-bbox="436 552 741 624">Primary Special</td> <td data-bbox="741 552 983 624">0.00363</td> <td data-bbox="983 552 1305 624">3.63</td> <td data-bbox="1305 552 1617 624">18.51</td> </tr> <tr> <td data-bbox="436 624 741 695">Secondary Special</td> <td data-bbox="741 624 983 695">0.004</td> <td data-bbox="983 624 1305 695">4</td> <td data-bbox="1305 624 1617 695">20.4</td> </tr> <tr> <td data-bbox="436 695 741 756">Early Years</td> <td data-bbox="741 695 983 756">0.085</td> <td data-bbox="983 695 1305 756">85</td> <td data-bbox="1305 695 1617 756">433.5</td> </tr> </tbody> </table> <p>All information on how we calculate developer contributions can be found in the Leicestershire Planning Obligation Policy published by the County Council in July 2019:</p> <p><a href="https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/8/16/Planning-Obligations-Policy.pdf">https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/8/16/Planning-Obligations-Policy.pdf</a></p> <p>School forecast data complete with a narrative summary is provided to the District Council on an annual basis. This information gives details about school capacities, predicted numbers on roll and school sites. When sites for the Local Plan are identified we can provide updated forecast information and discuss further what the likely education provision will need to be to provide new school places.</p> <p><b><u>Consultation Question Education Responses</u></b></p> <p>Please find below the County Council’s responses to the specific questions set out in the consultation that apply to education:</p> <table border="1" data-bbox="421 1265 2143 1482"> <thead> <tr> <th data-bbox="421 1265 488 1302"></th> <th data-bbox="488 1265 1104 1302"><i>Questions</i></th> <th data-bbox="1104 1265 2143 1302"><i>Comments</i></th> </tr> </thead> <tbody> <tr> <td data-bbox="421 1302 488 1374">27.</td> <td data-bbox="488 1302 1104 1374">Do you agree with these Local Plan Review Objectives? If not, why not?</td> <td data-bbox="1104 1302 2143 1374">The objectives appear to be a logical approach in the continued development of the Local Plan.</td> </tr> <tr> <td data-bbox="421 1374 488 1445">28.</td> <td data-bbox="488 1374 1104 1445">Do you agree with the proposed settlement hierarchy? If not, why not?</td> <td data-bbox="1104 1374 2143 1445">The hierarchy is in line with other Local Council’s that we have been consulted upon.</td> </tr> <tr> <td data-bbox="421 1445 488 1482">29.</td> <td data-bbox="488 1445 1104 1482">Do you agree with the approach to Local Housing</td> <td data-bbox="1104 1445 2143 1482">Cannot comment without knowing specific details about the actual areas for housing</td> </tr> </tbody> </table> |  |  | <i>Phase</i> | <i>Pupil Yield Per 100 Dwellings</i> | <i>Option 3a 1,000 Dwellings School Places Generated</i> | <i>Option 7b 5,100 Dwellings School Places Generated</i> | Primary | 0.3 | 300 | 1,530 | Secondary | 0.2 | 200 | 1,020 | Primary Special | 0.00363 | 3.63 | 18.51 | Secondary Special | 0.004 | 4 | 20.4 | Early Years | 0.085 | 85 | 433.5 |  | <i>Questions</i> | <i>Comments</i> | 27. | Do you agree with these Local Plan Review Objectives? If not, why not? | The objectives appear to be a logical approach in the continued development of the Local Plan. | 28. | Do you agree with the proposed settlement hierarchy? If not, why not? | The hierarchy is in line with other Local Council’s that we have been consulted upon. | 29. | Do you agree with the approach to Local Housing | Cannot comment without knowing specific details about the actual areas for housing |
| <i>Phase</i>      | <i>Pupil Yield Per 100 Dwellings</i>  | <i>Option 3a 1,000 Dwellings School Places Generated</i>                                       | <i>Option 7b 5,100 Dwellings School Places Generated</i> |              |                                      |  |  |         |     |     |       |           |     |     |       |                 |         |      |       |                   |       |   |      |             |       |    |       |  |                  |                 |     |  |  |     |   |   |     |   |  |
| Primary           | 0.3   | 300  | 1,530  |              |                                      |  |  |         |     |     |       |           |     |     |       |                 |         |      |       |                   |       |   |      |             |       |    |       |  |                  |                 |     |  |  |     |   |   |     |   |  |
| Secondary         | 0.2   | 200  | 1,020  |              |                                      |  |  |         |     |     |       |           |     |     |       |                 |         |      |       |                   |       |   |      |             |       |    |       |  |                  |                 |     |  |  |     |   |   |     |   |  |
| Primary Special   | 0.00363   | 3.63   | 18.51  |              |                                      |  |  |         |     |     |       |           |     |     |       |                 |         |      |       |                   |       |   |      |             |       |    |       |  |                  |                 |     |  |  |     |   |   |     |   |  |
| Secondary Special | 0.004   | 4  | 20.4   |              |                                      |  |  |         |     |     |       |           |     |     |       |                 |         |      |       |                   |       |   |      |             |       |    |       |  |                  |                 |     |  |  |     |   |   |     |   |  |
| Early Years       | 0.085   | 85   | 433.5  |              |                                      |  |  |         |     |     |       |           |     |     |       |                 |         |      |       |                   |       |   |      |             |       |    |       |  |                  |                 |     |  |  |     |   |   |     |   |  |
|                   | <i>Questions</i>  | <i>Comments</i>  |  |              |                                      |  |  |         |     |     |       |           |     |     |       |                 |         |      |       |                   |       |   |      |             |       |    |       |  |                  |                 |     |  |  |     |   |   |     |   |  |
| 27.               | Do you agree with these Local Plan Review Objectives? If not, why not?  | The objectives appear to be a logical approach in the continued development of the Local Plan. |  |              |                                      |  |  |         |     |     |       |           |     |     |       |                 |         |      |       |                   |       |   |      |             |       |    |       |  |                  |                 |     |  |  |     |   |   |     |   |  |
| 28.               | Do you agree with the proposed settlement hierarchy? If not, why not?   | The hierarchy is in line with other Local Council’s that we have been consulted upon.          |  |              |                                      |  |  |         |     |     |       |           |     |     |       |                 |         |      |       |                   |       |   |      |             |       |    |       |  |                  |                 |     |  |  |     |   |   |     |   |  |
| 29.               | Do you agree with the approach to Local Housing   | Cannot comment without knowing specific details about the actual areas for housing             |  |              |                                      |  |  |         |     |     |       |           |     |     |       |                 |         |      |       |                   |       |   |      |             |       |    |       |  |                  |                 |     |  |  |     |   |   |     |   |  |

|  | Questions  | Comments   |
|--|--|--|
|  |  | Needs Villages? If not, why not? development.  |
|  | 30. Do you agree with our proposed approach to the amount of housing growth at this time? If not please explain why, including any specific evidence you think is relevant.                                    | Cannot comment without knowing specific details about the actual areas for housing development. Estimated pupil yields provided in section 6 above based on number of proposed dwellings in options.       |
|  | 31. Do you agree with our proposed approach to the distribution of housing growth at this time? If not please explain why, including any specific evidence you think is relevant                               | Cannot comment without knowing specific details about the actual areas for housing development. Estimated pupil yields provided in section 6 above based on number of proposed dwellings in options.       |
|  | 32. Do you agree with the proposed self-build and custom housebuilding policy? If not, why not?  | Whilst Education has no particular view on the policy, the District Council needs to be aware that such schemes may still generate the need for a contribution towards the provision of new school places. |
|  | 33. Do you agree with the proposed health and wellbeing policy? If not, why not?   | Yes, we agree with the health and wellbeing policy as it will have a positive impact on families moving into the new developments.   |
|  | 34. Do you agree with the proposed Health Impact Assessment policy? If not, why not?   | Yes, we agree with the Health Impact Assessment as it will have a positive impact on families moving into the new developments.  |
|  | 35. Do you agree that the policy should also indicate that an initial Health Impact Screening Statement could also be sought for any other proposal considered by the council to require one? If not, why not? | Yes, we agree with the Health Impact Screening for other proposals providing there is a clear policy on how the proposals are determined.  |
|  | 36. Do you agree with the proposed renewable energy policy? If not, why not?   | See Section 5 above.   |
|  | 37. Do you agree with the preferred policy approach for energy efficiency? If not, why not?  | See Section 5 above.   |
|  | 38. Do you agree with the preferred policy approach for Lifecycle Carbon Assessment? If not, why not?  | See Section 5 above.   |
|  | 39. Do you agree with the preferred policy approach for overheating? If not, why not?  | See Section 5 above.   |
|  | 40. Do you agree with the preferred policy approach for the climate change assessment of development? If not, why not?   | See Section 5 above.   |
|  | 41. Do you agree with the proposed policy for reducing carbon emissions? If not, why not?  | See Section 5 above.   |
|  | 42. Do you agree with the proposed policy for water efficiency standards? If not, why not?   | See Section 5 above.   |

|   | Questions | Comments   |                      |
|---|-----------|--|----------------------|
|   |           | 43. What additional comments do you have about the Local Plan Review not covered by the preceding questions? | See Section 8 below. |
| <p><b>8. <u>Next Steps</u></b></p> <p>To provide an accurate calculation of education provision needed to meet NWLDC’s Local Plan the following information will be required:</p> <ul style="list-style-type: none"> <li>• Where are the expected development sites? <ul style="list-style-type: none"> <li>- Please provide a map to illustrate locality</li> </ul> </li> <li>• Exactly what type of houses will be built? <ul style="list-style-type: none"> <li>– Please provide numbers and types of dwellings that will be included.</li> </ul> </li> <li>• What is the likely commencement date and time frame for completion? <ul style="list-style-type: none"> <li>– Please provide dates and likely annual build rate.</li> </ul> </li> </ul> |           |  |                      |

[Interim Sustainability Appraisal Report of the Spatial Options](#)

| Page/Section (if relevant)                   | Comments  |
|--|---|
| Table 3.1: RAG Assessment Criteria, page 17. | The Sustainability Appraisal has regard to minerals and waste safeguarding under SA17 which states, ‘Ensure minerals deposits and sites allocated for waste management are not sterilised through inappropriately located development’. However, the traffic lighted criteria only have regard to mineral safeguarding areas and not those waste sites which are safeguarded in the Leicestershire Minerals and Waste Local Plan (adopted 2019). Whilst we are working on the production of a waste safeguarding layer for GIS use, the criteria should still refer to waste safeguarding as it is spatially assessable from our Local Plan. This would ensure that sustainable waste management within the county is not compromised by other forms of development or that any new residential, or other, development is adversely affected by existing waste management facilities. |
| Table 4.1                                    | It is noted that only one option (Option 8) has an effect for SA17 in relation to efficient use of natural resources and the rest are scored as ‘uncertain’. For Option 8, we would welcome the reasons for the positive effect to be noted. It is understandable that other options cannot yet be allocated effects for SA17 owing to the unknown location and magnitude of development sites. We welcome further consultation once options and locations for potential development are narrowed further.  |