

APPENDIX A

Leicestershire County Council's Proposed Response to consultation on Hinckley and Bosworth Borough Council New Local Plan (2020 to 2041) Regulation 18 Consultation Draft Plan July 2024

Section 1: What is the Local Plan?

Q1 How has it been prepared?

Concern that the evidence base is still not complete, and the spatial development strategy moves away from a focus on the major urban area. See further detailed responses to questions.

Q2 What has occurred since the Regulation 19 pre-submission consultation in 2022?

Nationally there has been a continued worsening of finance for local government which impacts on the ability to provide strategic infrastructure. The requirements of the Levelling Up and Regeneration Act 2023 (provisions and secondary legislation still coming forward), and the recent announcement of the new planning reforms and current consultation on the National Planning Policy Framework Proposed Changes (which includes a new Standard Method for calculating housing need), provide a context of continuing planning reforms.

In Leicestershire the County Council considered the increasing pressures on the County Council's Capital Programme relating to infrastructure at Cabinet in May 2022, financial implications for the Council of delivering sustainable and inclusive growth (plus agreed approach and principles to manage these risks) at Cabinet in November 2022, and has been working on an approach with Charnwood BC regarding the Charnwood Interim Transport Contributions Strategy.

The County Council supports developing the evidence base and having a complete policy approach in the local plan. As retrofitting a local plan with evidence developed after submission is very problematic. In parallel, input to the Development Management process is critical, in recognition of the time it takes to progress a Local Plan through to adoption.

Q3 Neighbourhood Planning

Support bringing forward further Neighbourhood Plans and the review of existing made Neighbourhood Plans in the area.

Q4 Strategic Growth Plan

Welcome reference to the Strategic Growth Plan and the long-term vision and steer it provides for local plans in Leicester and Leicestershire.

Q5 Duty to co-operate and statements of common ground

Demonstrated through the Leicester and Leicestershire Statement of Common Ground (SoCG) relating to Housing and Employment Need (July 2022) and the South Leicestershire authorities' joint evidence SoCG (December 2021).

Q6 General or other comments

Unfortunately, it is apparent that many of the comments made previously on the last local plan consultation in March 2022, or the penultimate consultation in September 2021 appear to have not shaped or informed this draft plan. To strengthen the plan and make the best use of resources reference to these comments is advised.

A full health impact assessment is being undertaken by Leicestershire County Council's Public Health team who are working closely with Hinckley and Bosworth BC to provide public health data and ensure health considerations within Local Plans improve health and wellbeing outcomes of local residents. A HIA stakeholder workshop is arranged for September and full HIA report will be submitted to planners by end of October.

Section 2: Spatial Portrait

Q7 Spatial Portrait

Paragraph 2.9 notes highest percentage of usual residents aged 65 and over were more commonly located in more rural central parishes. An aging population can bring challenges of accessibility, rural isolation and inadequate provision of services.

Paragraph 2.19 notes Hinckley and Bosworth's unemployment rate has consistently remained below Great Britain and East Midlands averages for over a decade, with the borough's figure dropping as low as 2.1% in December 2022. before rising slightly up to 3.4% in December 2023. In December 2023, the unemployment figure remains below Great Britain and East Midland averages of 3.7%.

Would be helpful to break this inactivity down by age as with an ageing workforce the economically inactive could include a % of older people who are unlikely to re-enter the workplace versus students who potentially could.

Paragraph 2.28 – Service Provision: Add Triumph Visitor Centre to list of main visitor attractions. Market Bosworth, one of Leicestershire's prettiest market towns, is also a key Leicestershire visitor destination. Refer to page 35 of Leicestershire Tourism Growth Plan "Explore Bosworth"

<https://www.leicestershire.gov.uk/sites/default/files/field/pdf/2019/11/8/leicester-leicestershire-tourism-growth-plan.pdf>

Section 3: Vision and Objectives

Q8 Vision and Objectives

The statement within the vision which states "Development will be focused in the urban areas where it will be closest to key services, opportunities, key transport links and facilities" is welcomed as it will lead to development in the most sustainable

locations. The statement “Sustainable development will be supported in rural communities with our key rural centres and villages shaped by the Local Plan.” is supported as it will support existing community infrastructure and maintain sustainable communities in key rural settlements.

Further, the plan objectives are broadly welcomed in particular economic objectives 10,11 and 12.

P24 People - Social Objectives - Healthy Communities and Places

No mention of trying to ensure that there is a supply of employment opportunities available locally so that people do not have to travel – this becomes more sustainable and is better for people on low paid jobs.

P26 13. Towns and Village Centres –

It is important that any development maintains the historic and attractive character of Market Bosworth upon which a number of tourism and hospitality Small and Medium Enterprises depend.

There has been concern in recent years regarding the proposed MIRA test track extension and its impact on the historic Bosworth Battlefield site (mentioned on page 76 of the Plan).

Suggest changes and additions below to strengthen links to waste prevention as well as other measures to reduce carbon footprint.

Vision

*...Sustainable development will be supported in ~~in rural~~ **our** communities with our key rural centres and villages shaped by the Local Plan and neighbourhood plans influenced by our communities. Growth will respect the borough’s important townscapes and natural landscapes, and the borough is a place where our historic and cultural assets will be respected for their intrinsic significance and for the positivity benefits they can bring. The borough will have a cleaner and greener environment and we will promote sustainable development and initiatives to reduce the carbon footprint of the borough **through energy efficiency measures, waste prevention and nature-based solutions.***

Suggest inclusion of the waste hierarchy within the environmental objectives:

For Environmental Objectives 7. ‘*Climate Change - To mitigate climate change and reduce the effects of new development on air quality and carbon emissions by promoting a sustainable pattern of development, the use of sustainable materials, nature-based solutions, low carbon technologies, sustainable transport options, renewable energy and energy efficiency measures **and the waste hierarchy (preventing, reducing, reuse and recycling waste).***’

Section 4: Spatial Strategy

Q9 SP01 Sustainable Development

Policy SP01 reflects the provisions of NPPF (National Planning Policy Framework) paragraph 11 and is therefore supported.

Paragraph 4.10 on Affordable Housing. In the Spatial Portrait in Section 2 the following statement was made: highest percentage of usual residents aged 65 and over were more commonly located in more rural central parishes.

The availability of affordable housing in rural areas is critical to attracting and retaining residents, particularly the younger working populations. According to the **Rural Services Network** in their report “Winning the Rural Vote – A Roadmap to Rural Success” (2024) houses in rural areas are less affordable to purchase for those in the bottom 25% of earners compared to urban. They also state that lower than average wages are earned in the rural economy, making accessing housing unaffordable. They also claim that rural areas suffer from a lack of affordable rental property. This could be given consideration when evaluating a need for affordable housing.

Page 32 - 180 homes on land south of Station Road (phase 2), Market Bosworth; Refer to point made in Section 3 regarding Market Bosworth - It is important that any development maintains the historic and attractive character of the area upon which a number of tourism and hospitality Small and Medium Enterprises depend.

Q10 SP02 Development Strategy

Provision is made for the delivery of 13,862 homes to be delivered in the period 2020-2041; a figure that accords with the housing need identified in the Leicester and Leicestershire Statement of Common Ground relating to Housing and Employment Need. This is welcomed.

It is considered that this figure be regarded as a minimum to which a flexibility allowance of up to 10% be added in order to provide the plan with additional resilience in the event of development not coming forward in line with current projections. Further, by adding an allowance over and above the basic requirement will facilitate the delivery of increased levels of affordable housing necessary to reduce the shortfall in meeting currently assessed need.

Given Leicester City Council’s declaration of unmet need runs to 2036, the approach to ‘roll-over’ the apportioned annual figure for the entire plan period (to 2041) is considered sensible. However, it needs to be borne in mind that it is likely that the unmet housing need figure for the borough will increase in the 2036 to 2041 period which would mean provision would need to be made in the new Local Plan for a higher figure. Indeed, the new Standard Method which forms part of the NPPF Proposed Changes currently being consulted on indicates a higher figure for the borough.

The amount of provision over the Plan period is supported, although Policy SP02 contains a greater spread of allocations in settlements further down the hierarchy than anticipated, particularly non-strategic major development sites (101 to 499 dwellings in size). The County Council would wish to see a stronger focus on strategic site allocations in the Urban Area to provide for sustainable growth and the best opportunities to secure funding for essential strategic infrastructure.

The County Council has concerns regarding the new settlement proposal at Lindley Meadows. The proposed allocation at Lindley Meadows for up to 3000 dwellings (1000 to be delivered in the Plan period) on land between MIRA and Fenny Drayton causes concern given the location of the proposed allocation, with limited opportunities for sustainable travel, and the close proximity to the A5 (challenges with capacity and mitigation measures required). The findings of the Strategic Growth Options Study (entitled “Strategic Growth Options and Constraints Mapping for Leicester and Leicestershire) includes reference to a potential strategic site to the west of Fenny Drayton (4c Fenny Drayton), the analysis of which is applicable to the proposed allocation at Lindley Meadows to the east of Fenny Drayton, which includes reference to the limited access to local amenities and challenges posed by the constraints on the A5 corridor.

As part of the review of the spatial strategy options, the Draft Plan refers to splitting the borough into four sub-areas as a starting point; ‘Urban South’, ‘Central’, ‘West’ and ‘North East and Leicester Suburbs’. Whilst this approach is supported these sub-areas are not referenced anywhere else in the Plan, nor in any supporting documentation around proposed site allocations. Understanding how these sub-areas have been utilised to inform and arrive at the proposed site allocations is unclear.

Given the evidence provided in the SGP (Strategic Growth Plan) Growth Options Report which concluded that a 128 hectare site on land North of Normandy Way Hinckley, capable of delivering 3200 houses, is a suitable site for strategic development there appears little justification in making only a partial allocation of 1200 houses as the full allocation would ensure an ongoing supply of houses throughout the plan period in a sustainable location. Further, the distribution strategy will also need to take account of the outcome of the HNRFI (Hinckley National Rail Freight Interchange) DCO (Development Consent Order) Application which, if successful, may require an even greater focus is placed on housing delivery in sustainable locations around the Hinckley urban area including North of Normandy Way.

Welcome the provision of 194.68ha of employment land during the plan period. Strategic employment land should be allocated within existing urban areas, adjacent to existing urban areas or within sustainable locations aligned to the strategic transport network. Good to note that the Local Plan will consider the outcome of the Hinckley National Rail Freight Interchange DCO application when considering strategic distribution needs.

There is an ongoing concern regarding an over reliance on the mixed use Barwell SUE (Policy SP02 2b) ii and Policy SP04) as part of the Local Plan strategy. Reference is also made to both the Barwell SUE and Earl Shilton SUE by the LTA (Local Transport Authority) in the substantive transport response.

As part of Policy SP02 Development Strategy, asterisks are used when referring to employment sites at Cliffe Hall Farm and Wapping and Harrow Farm, Watling Street Hinckley; the purpose of these asterisks are not clear and do not appear to point to any footnote.

The County Council would welcome consideration in regard to new developments and their impact on local Household Waste and Recycling Centres (HWRCs), due to the increase in waste arisings.

Q11 SP03 Strategic Site: Earl Shilton Sustainable Urban Extension (SUE)

The Earl Shilton SUE has been slow to come forward and after 15 years has only recently gained planning permission. Despite this the draft Local Plan seeks to allocate an additional strategic site on land to the south of the A47 Earl Shilton bypass.

The County Council would welcome further engagement to help forward plan regarding managing future capacity at local Household Waste and Recycling Centres (HWRCs).

Q12 SP04 Strategic Site: Barwell Sustainable Urban Extension (SUE)

In 2015, the district council was minded to grant planning permission for the Barwell SUE, subject to completion of a Section 106 Agreement. Nearly 10 years on, and despite protracted work by the applicant, the transport elements of the S106 have yet to be resolved and agreed; even as and when they are, it is unclear how the much-changed circumstances since 2015 (such as very significant construction price inflation) might affect the site's financial viability. Despite such uncertainties, and the fact that the Barwell SUE impacts on the A5 Dodwells Longshoot Junction, it continues to feature as a key element of the draft Plan.

There is an ongoing concern regarding an over reliance on the mixed use Barwell SUE (Policy SP02 2b) ii and Policy SP04) as part of the Local Plan strategy.

The County Council would welcome further engagement to help forward plan regarding managing future capacity at local Household Waste and Recycling Centres (HWRCs).

Q13 General or other comments

The amount of provision over the Plan period is supported, although Policy SP02 contains a greater spread of allocations in settlements further down the hierarchy than anticipated, particularly non-strategic major development sites (101 to 499 dwellings in size). The County Council would wish to see a stronger focus on strategic site allocations in the Urban Area to provide for sustainable growth and the best opportunities to secure funding for essential strategic infrastructure.

The proposed allocation at Lindley Meadows for up to 3000 dwellings (1000 to be delivered in the Plan period) on land between MIRA and Fenny Drayton causes concern given the location of the proposed allocation, with limited opportunities for sustainable travel, and the close proximity to the A5 (challenges with capacity and mitigation measures required). The findings of the Strategic Growth Options Study (entitled "Strategic Growth Options and Constraints Mapping for Leicester and Leicestershire) includes reference to a potential strategic site to the west of Fenny Drayton (4c Fenny Drayton), the analysis of which is applicable to the proposed

allocation at Lindley Meadows to the east of Fenny Drayton, which includes reference to the limited access to local amenities and challenges posed by the constraints on the A5 corridor.

The Earl Shilton and Barwell SUEs are, as yet not delivering the predicted level of housing numbers as outlined in the current and emerging local plans. Therefore, it may be necessary for the plan to provide reassurance as to the future housing delivery or alternatively bring forward additional allocations to meet any shortfall and maintain a 5-year housing land supply.

Section 5: Climate Change

Q14 SP05 Mitigating and Adapting to Climate Change

We welcome the inclusion of circular economy principles, waste reduction and specific mention of waste design in major developments.

Page 46 Support active design, active travel and sustainable public transport modes to reduce demand for car use.

Twycross Zoo is one of the largest visitor attractions in the East Midlands attracting over half a million visitors annually. There is no bus route that includes the Zoo and access along the A444 is difficult for cyclists and pedestrians. Almost all visitor journeys are made by private car or coach which impacts on carbon emissions. As well as visitors from outside the area, the zoo is a popular leisure attraction for local residents. Alternative modes should be considered.

Suggest including additional text in bold under part 'p' to include waste prevention:

*Part p 'Incorporating recycling and waste **prevention** / reduction both during construction and occupation'*

Suggest adding the text below into the policy SP05 to allow consideration to the waste hierarchy during development:

'Development must follow the waste hierarchy to prevent, minimise, reuse, and recycle waste during the construction phase and to encourage greater levels of reuse, recovery and recycling over the lifetime of the development.'

Q15 SP06 Flood Risk

Policy SP06 reiterates statements that are present within NPPF and PPG which can be helpful to support the Lead Local Flood Authority's position on a consultation response. However, from a regulatory perspective, any policy statements that add weight to non-statutory guidance or local policies are of greater benefit.

It would be more impactful if the policy could be written more concisely with bulleting or numbering of individual statements. Consideration should be made as to whether HBBC want to include statements already strongly supported by NPPF and PPG.

The draft HBBC Level 1 Strategic Flood Risk Assessment (2024), includes several non-statutory policy recommendations which could be included in Policy SP06 on Flood Risk. The inclusion of the following to add weight to planning consultation responses would be welcomed:

- Development must consider the use of sustainable drainage systems (SuDS) and provide details of adoption, ongoing maintenance, and management.
- Surface water runoff rates from all development sites must be limited to greenfield rates (including brownfield sites).
- Culverting (except for essential infrastructure) is not permitted, and new development should day-light existing culverts, where feasible.

The 2019/20 Strategic Flood Risk Assessments are to be superseded by the current draft 2024 Strategic Flood Risk Assessment (Level 1), and the County Council as Lead Local Flood Authority looks forward to seeing the updated Level 2 Strategic Flood Risk Assessment, particularly given there are some new strategic sites being put forward as potential allocations.

Q16 SP07 Renewable and Low Carbon Energy

The policy is supported in that it enables commercial renewable energy schemes to be brought forward and assessed solely on the basis of planning criteria.

A study from 2014 is highly unlikely to be relevant due to the significant advancement in technology, knowledge, capabilities etc within the renewable energy world over the last 10 years. Renewable capacity technology in 2024 is significantly more advanced, and this could mean more sites have potential for renewable energy than in 2014.

There is an obvious opportunity here for waste developments to contribute to renewable energy production which can be included in the supporting text to the policy. This could explain that where appropriate and feasible there may be opportunity for decentralised energy development where it could be supplied by a major producer of heat/energy/steam such as a waste site.

Q17 General or other comments

No further comments at this time.

Section 6: Place Making and Design

Q18 SP08 High Quality Design

Welcome inclusion of recycling and waste management provision.

Page 58 on High Quality Design, ensure a sufficient level of vehicle parking, recycling and waste management (in line with adopted standards) that is well-integrated and not the main visual element.

As part of the Hinckley and Bosworth BC's ambitions to reduce carbon emissions, it is important that EV (Electric Vehicle) charging point infrastructure is accommodated within development sites.

Page 60 on Public Spaces, make a space interesting and exciting, public art, seating, etc

Earlier in the Plan, reference was made to the value of local heritage (such as hosiery, motor manufacturing, mining) in place making and place shaping. Incorporating an element of local history into these public realm improvements could increase a sense of community belonging and local identity.

Suggest including new text in bold within part 'I' to give a breakdown of waste management considerations:

'I) Ensures a sufficient level of vehicle parking, recycling and waste management (including appropriate collection vehicle access, facilities for kerbside collection, waste separation, and minimisation where appropriate) that is well-integrated and not the main visual element'

Suggest adding in the text below to policy SP08 to allow consideration to the waste hierarchy during development as well as other potential considerations to address carbon emissions:

'Development must consider how carbon emissions have been addressed and minimised including through materials sourcing, development design and layout, the energy hierarchy, water cycle, waste hierarchy and waste management solutions (during and post-construction).'

Q19 SP10 Preventing Pollution

The proposed policy should encompass the NPPF 'agent of change' principle as this will help to ensure that the continued use or expansion of extant minerals and waste sites are not prejudiced by the introduction of sensitive uses in the vicinity.

Q20 SP11 Health and Well-being

A full health impact assessment is being undertaken by Leicestershire County Council's Public Health team who are working closely with Hinckley and Bosworth BC to provide public health data and ensure health considerations within Local Plans improve health and wellbeing outcomes of local residents. A HIA stakeholder workshop is arranged for September and full HIA report will be submitted to planners by end of October 2024.

It is important to remember that the protection of human health and the environment are important elements of the Waste Framework Directive which are delivered by local planning authorities. NPPG is clear that Article 4: Waste Hierarchy and Article 13: Protection of human health and the environment are the responsibility of all planning authorities, not just waste planning authorities.

Q21 Overall or other comments

Hinckley and Bosworth BC is advised to note the likely changes in nutrient neutrality rules given the north western tip of the borough (north of Twycross) is located within the catchment area of the River Mease Special Area of Conservation (SAC). Natural England initially advised on this SAC in 2022.

Paragraph 6.47 on Health Impact Assessments being required for all major developments is supported, though it is noted there are a significantly number of minor amendments required to correct the text.

Section 7: Housing to Meet Different Needs

Q22 SP13 Gypsies, Travellers and Travelling Showpeople

Hinckley and Bosworth BC is working with the Multi-Agency Traveller Unit on producing a 2024 Gypsy and Traveller Accommodation Assessment to replace the Gypsy and Traveller Accommodation Needs Study 2016 which is now out of date. With regards to Policy SP13 in the local plan clearer wording is sought for Transit pitches to reflect that any identified Transit need is to be met by the development of local authority Transit sites.

The 2023 Health Inequalities Joint Strategic Needs Assessment found certain population groups across Leicestershire to be at a higher risk of experiencing health inequalities. The Gypsy and Traveller population were indicated as a group of concern for health inequalities.

Minerals and waste safeguarding is also important in this case to ensure that sensitive uses (GTT sites) are not introduced into the vicinity of the existing minerals or waste sites. This could cause amenity issues for residents of the new sites or complaints arising should applications be made to intensify activity at the existing minerals and waste sites.

The development of a site in a mineral safeguarding area could also sterilise the mineral resource beneath or adjacent to the site and would therefore be contrary to Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) without a Mineral Assessment. This should therefore form a consideration in the assessment of suitable sites.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility. Allocations should therefore also consider waste sites.

Q23 Overall or other comments

Whilst appreciating the need to meet the specific housing needs of Gypsies, Travellers and Travelling Showpeople the policy needs to be broadened to include

all those groups detailed in NPPF paragraph 63 not covered elsewhere in the plan, and reference the fact that others are included within relevant policies.

Section 8: Economic Prosperity

Q24 SP16 Strategic Site: MIRA Enterprise Zone

Welcome the specific policy to support high quality employment aligned to the MIRA enterprise zone. Policy needs to reflect the evolving innovation around mobility and automation technology, so not to limit emerging automotive-aligned sectors.

Q25 Overall or other comments

Reference is made to the Strategic B8 requirements for Leicester and Leicestershire still emerging and this being dependent on the HNRFI DCO outcome, which is expected imminently. The County Council recognises this is the case and, to future proof work on the local plan as much as possible, advises strengthening the focus of new development on the Hinckley Urban Area.

On page 73 the Plan states “Whilst there is adequate supply overall (66ha) for the plan period, econometric forecasting indicates that for some sectors, there is likely to be an additional requirement for general employment land in the region of between 33ha to 55ha”. It would be useful to expand on what sectors are forecast to grow.

Further on page 73 there seems to be a focus in providing land for large warehousing, (together with land supply at MIRA which will create more skilled jobs) potentially limiting the type of employment uses moving forward. Industry insights (see NOTES below) indicate modern, large warehouses are becoming increasingly more automated, requiring a different skill set to traditional warehouse operators. Additionally, units are also incorporating more back-office functions. There is little information on the current skills levels of HBBC residents and whether there is a need to upskill residents. To remain competitive, HBBC should incorporate policies to train and attract high skilled employees to support the needs of future occupiers.

Appreciate that, given HBBC’s location on the strategic road network with the A5 and M69 near Hinckley and M1 at Markfield, it appeals towards ‘big shed’ developers but have the skills levels of the existing workforce been examined? How many people in HBBC work at Enterprise Zone at MIRA? Is ‘grow on’ space required for existing businesses?

Following the pandemic, more employers are adopting the hybrid-working model, which is seeing an evolution of traditional office accommodation over large floor plates, to smaller, high-quality, regional, mixed-use offices, aligned to areas that offer a ‘good quality of life’. HBBC should consider whether the district has sufficient, high quality, flexible office accommodation and what the need would be for supplying more.

NOTES: Industry insights <https://uk-manufacturing-online.co.uk/key-warehouse-automation-trends-to-watch-out-for-in-2024/>

<https://interactanalysis.com/insight/why-the-uk-is-set-to-become-europes-largest-warehouse-automation-opportunity/>

<https://statzon.com/insights/the-warehouse-automation-market#:~:text=With%20the%20significant%20increase%20in,by%20Next%20Move%20Strategy%20Consulting.>

<https://www.nextmsc.com/report/ul-industrial-process-automation-market>

Section 9: Town, District, Local and Neighbourhood Centres

Q26 Town, District, Local and Neighbourhood Centres

The County Council would look to see recognition of the behavioural change in society and a strengthening of the core retail area through a 'managed contraction', in parallel with a move for more emphasis on healthy options in all centres and a restriction on the number of hot food takeaways in favour of healthier retail uses, or community uses, leisure uses compatible with residential uses, and live/work units on the periphery of designated centres.

Section 10: Communities, Leisure and Tourism

Q27 SP19 Twycross Zoo

Page 81, the attraction welcomes 500,000 visitors not 5 million.

Q28 Overall or other comments

No further comments at this time.

Section 11: Natural Environment

Q29 SP20 Green Infrastructure

There continues to be concern over the use of the Green Infrastructure Strategy (2020) as an acceptable evidence base. This issue was previously raised in the Regulation 19 response in March 2022.

Policy SP21 on Green Wedges is unclear (note points n. to r. duplicate h. to l) and needs to be amended.

No reference is made to the new Strategic Flood Risk Assessment being produced (2024) only refers to 2019 version (see chapter 5 under climate change).

Increased reference to the emerging Local Nature Recovery Strategy (LNRS) and mandatory Biodiversity Net Gain (BNG) are required to help futureproof the Plan.

There is an old reference to NPPF 2021 which needs updating.

Green infrastructure has a significant impact on people's health and wellbeing including but not limited to air quality, physical and mental health and social

wellbeing. Accessibility should be considered for different groups of people and the Local Plan should consider how Green Infrastructure planning can influence health inequalities. Recommendations on green space will be provided within the full Health Impact Assessment (HIA) report which will be submitted to planners by end of October 2024.

Mineral (and sometimes waste) site restoration has biodiversity and green and blue infrastructure benefits, and this could be recognised in the supporting text. This could be through habitat creation for example, or through flood storage on former minerals sites. There may be the opportunity to join development into more strategic Green and Blue Infrastructure delivered by mineral or waste site restoration which could be mentioned here. This also links to the climate emergency.

The policy should refer to the Local Nature Recovery Strategy. This is particularly relevant at the point at which major developments prepare a Green and Blue Infrastructure Plan.

The word biodiversity should feature in the list of natural capital assets listed in point 'e' and refer to species...'such as bee pollinator friendly'

Section 'g' misses the words 'blue' in relation to maintenance of infrastructure.

Under paragraph 11.1 there should be reference to the Biodiversity Duty placed on the Council under the Environment Act 2021.

Q30 SP21 Green Wedges

Under policy box point 'i' and 'o' also mention blue networks within the Green Wedge.

Under point 'k' and 'q' add the words 'enhance the visual appearance of the green wedge.'

Q31 SP24 Protecting Biodiversity

See response to Q 29.

Q32 SP25 Enhancing Biodiversity and Habitat Connectivity

The Local Nature Recovery Strategy also needs to be embedded in Policy SP25.

Mineral (and sometimes waste) site restoration has biodiversity and green and blue infrastructure benefits, and this could be recognised in the supporting text. This could be through habitat creation for example, or through flood storage on former minerals sites. There may be the opportunity to join development into more strategic Green and Blue Infrastructure delivered by mineral or waste site restoration which could be mentioned here. This also links to the climate emergency.

Q33 SP26 Development in the Countryside and Settlement Separation

Welcome the inclusion of minerals and waste development in the permitted uses in the countryside.

Q34 SP27 Landscape Character

Under point 'e' wording should say 'Where significant landscape impacts are likely to occur a Landscape and Visual Impact Assessment (LVIA) should be submitted. Prepared in accordance with the Landscape Institute's "Guidelines for Landscape and Visual Impact Assessment, third edition (GLVIA3) 2013" which is the industry standard work on LVIA giving detailed advice on the process of assessing the landscape and visual effects of developments and their significance.

Q35 SP28 Blue Infrastructure

Welcome the mention of relatively substantial still water bodies at former mineral sites in the north of the borough such as Thornton Reservoir and Groby Pool. It should be noted that former mineral (and in certain cases waste) sites can provide green and blue infrastructure and also act as climate change mitigation by providing flood storage.

With respect to water bodies Sustainable Urban Drainage should also be mentioned in the policy around blue infrastructure and has relevance to green & blue infrastructure in relation to the development of highways (Section 12).

Section 12: Transport

Q36 SP29 Transport, Movement and Access

The response of the Local Transport Authority is set out in the overarching response earlier in the main report.

It is noted there is no reference to the cycling and walking strategy which is currently being developed to the north of Leicester. This needs to be referenced together with the substantial challenges detailed earlier in the main report, the work on LTP4 and how this Local Plan seeks to meet the core objectives and core policies of LTP4.

Q37 SP30 A5 Improvement Corridor

See the overarching response in the main report and response to Q36 above.

Section 13: Infrastructure

Q38 SP31 Infrastructure and Delivery

The policy recognises that the delivery of infrastructure is an integral part of the development process vital to ensuring that the needs of the community are met. Focussing development on strategic sites of appropriate scale is seen as the best way of securing the infrastructure required to support new communities and provide wider benefits for surrounding areas.

Note in paragraph 12.22 the term 'Local Education Authority' should be removed, and post-16 education should be more specifically referred to.

We support the inclusion of waste management facilities in the list of Critical Infrastructure in the supporting text of this policy. We also support the inclusion of water supply and sewerage in the list of Critical Infrastructure. It could also be mentioned that whilst connected planning functions are delivered by the County Council, minerals make an essential contribution to the country's prosperity and quality of life.

The County Council support 'Waste Management Facilities' as critical infrastructure.

Q39 SP32 Water Supply and Wastewater Management

We support the aims of the policy in relation to both water use and efficiency and the provision of adequate water supply and wastewater treatment infrastructure and capacity. We welcome the intention to ensure that adequate wastewater treatment infrastructure and capacity and water supply is in place to serve the development at the time of occupation.

Q40 SP33 Telecommunications Infrastructure

Section 12.35 (page 122) makes reference to providing superfast broadband. Commercial and government broadband delivery projects are no longer centred around superfast broadband delivery.

Currently reads as "... *The key consideration for telecommunications in the Local Plan is to ensure that new development is fully equipped and future-proofed to provide superfast broadband provision.*"

Suggested alternative wording to be inclusive of future broadband developments: "*The key consideration for telecommunications in the Local Plan is to ensure that new development is fully equipped and future-proofed to provide access to fast and reliable broadband.*"

Appendix 1: Glossary

Q41 Glossary

Ensure the Local Nature Recovery Strategy (LNRS) is included.

Appendix 2: Key Diagram

Q42 Key Diagram

As currently presented the key diagram does not show any strategic allocations other than the Barwell and Earl Shilton Sustainable Urban Extensions. The next iteration of the key diagram needs to spatially illustrate where development is being directed to.

Appendix 3: Reg 18 Proposed Site Allocations V6

Q43 AS237: Earl Shilton Sustainable Urban Extension (SUE)

Note concern raised in the main report regarding the Earl Shilton SUE.

Whilst it is appreciated that there are now extant outline permissions on the site (ref 21/01511/OUT and 23/00330/OUT), it is still pertinent to consider the need for waste safeguarding and for this to be considered through the development process.

Under Policy W9 of the Leicestershire Minerals and Waste Local Plan (LMWLP) it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility. The allocation seems to surround a Sewage Treatment Works.

Public Health comments for this site have been provided to the H&BBC planning team during the drafting of this plan.

Q44 AS58: Barwell Sustainable Urban Extension (SUE)

Note concern raised in the main report regarding the Barwell SUE. There is an ongoing concern regarding an over reliance on the mixed use Barwell SUE (Policy SP02 2b) ii and Policy SP04) as part of the Local Plan strategy.

As you will be aware, the site lies within a Minerals Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.

We are aware that this site is the subject of an outline planning application which remains live at time of writing (ref 12/00295/OUT). It remains pertinent to consider the need for mineral safeguarding and for this to be considered through the development process.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility. The allocation seems to surround a RHWS recycling centre.

Public Health comments for this site have been provided to the H&BBC planning team during the drafting of this plan.

Q45 LPR200: Land South of the A47, Earl Shilton

Note concern raised in the main report regarding the Earl Shilton SUE and the implications this has for potentially identifying an extension to the Earl Shilton SUE on land to the south of the A47, Earl Shilton.

The site lies within a Minerals Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral,

including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility. The allocation seems to surround Earl Shilton Sewage Treatment Works. It is noted that the site is across the A47 to the south of the STW. The effects of topography however result in the allocation surrounding the site on two sides.

Public Health comments for this site have been provided to the H&BBC planning team during the drafting of this plan.

Q46 AS1029, AS1031 A, AS1031 B and LPR199: North of Normandy Way, Hinckley North, Hinckley

The principle of delivering a strategic development area north of Normandy Way is supported. However, it is considered that land at Middlefield Farm, Hinckley, situated in two blocks to the East and West of Stoke Road (SHELAA (Strategic Housing and Economic Land Availability Assessment) Ref LPR 47 and LPR 48) be allocated as part of a wider scheme as envisaged in the SGP Strategic Growth Options Report which concluded that a 128 hectare site on land North of Normandy Way Hinckley, capable of delivering 3200 houses, was a suitable site for strategic development. Accordingly, there appears little justification in making only a partial allocation of 1200 houses as the full allocation would ensure an ongoing supply of houses throughout the plan period in a sustainable location and support the delivery of highways and community infrastructure, in addition to providing additional resilience in the delivery of the housing needs of the Borough.

Further, if the HNRFI DCO Application is successful a strategic development North of Normandy Way would be ideally located to meet some of the increased housing needs generated by that development.

The majority of the site allocation is not within a Minerals Safeguarding Area. That part of the site which is a Residential Site benefitting from outline planning permission (ref 22/00318/OUT) lies within a Minerals Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. We are aware of live applications on the site (refs 23/00432/OUT and 24/00264/OUT). Under Policy W9 of the LMWLP it is important

to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility.

Public Health comments for this site have been provided to the H&BBC planning team during the drafting of this plan.

County Council in its role as landowner

A separate more detailed consultation response will be submitted in support of the proposed allocation of Middlefield Farm. The site which is in the sole ownership of the County Council is considered to be suitable, available and deliverable and capable of delivering much needed housing within the plan period.

This has been confirmed by the initial due diligence work that has been undertaken to date. Further, work including the preparation of a draft masterplan and vision statement will be made available to the Council to further inform the emerging plan. Whilst the site is being promoted by the County Council rather than a housebuilder it is the County Council's normal practice to bring sites to the market immediately on the grant of an outline planning permission in much the same manner as a private sector land promoter. This model has a successful track record having previously brought forward an initial phase of development at Barton Road, as well as elsewhere across the county.

Q47 LPR31: Land West of Hinckley West, Hinckley

The principle of allocating land to the west of Hinckley West is supported, as it would bring forward further residential development in the Hinckley Urban Area.

The Ashby de la Zouch Canal on the western boundary of the potential allocation is noted and support is given to the proposed 20m natural buffer.

The site allocation is not within a Minerals Safeguarding Area.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility.

Public Health comments for this site have been provided to the H&BBC planning team during the drafting of this plan.

Q48 LPR235 A: Lindley Meadows

Note concern raised in the main report regarding the Lindley Meadows proposed new settlement.

The proposed allocation at Lindley Meadows for up to 3000 dwellings (1000 to be delivered in the Plan period) on land between MIRA and Fenny Drayton causes

concern given the location of the proposed allocation, with limited opportunities for sustainable travel, and the close proximity to the A5 (challenges with capacity and mitigation measures required). The findings of the Strategic Growth Options Study (entitled “Strategic Growth Options and Constraints Mapping for Leicester and Leicestershire) includes reference to a potential strategic site to the west of Fenny Drayton (4c Fenny Drayton), the analysis of which is applicable to the proposed allocation at Lindley Meadows to the east of Fenny Drayton, which includes reference to the limited access to local amenities and challenges posed by the constraints on the A5 corridor.

The advice of the Lead Local Flood Authority will need to be sought, given the Level 2 Strategic Flood Risk Assessment is still to be undertaken and there have been occurrences of flooding at MIRA, adjacent to this potential allocation.

Part of the site lies within a Minerals Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility.

Public Health comments for this site have been provided to the H&BBC planning team during the drafting of this plan.

Q49 LPR138 Land at Brick Kiln Street (the former Cadent site), Hinckley

This site is a proposed Non-Strategic Major Allocation as defined in the Local Plan consultation (sites of 100 to 499 dwellings) and accordingly no comments are made in relation to its strategic planning policy compliance; however, Appendix B contains earlier transport comments, and the following detailed comments have been made.

In principle support is given to this brownfield site within the Hinckley Urban Area.

The site allocation is not within a Minerals Safeguarding Area. There are no issues from a waste safeguarding perspective.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

Q50 LPR107: Land South of Markfield Road, Ratby

This site is a proposed Non-Strategic Major Allocation as defined in the Local Plan consultation (sites of 100 to 499 dwellings) and accordingly no comments are made

in relation to its strategic planning policy compliance; however, Appendix B contains earlier transport comments, and the following detailed comments have been made.

Part of the site lies within a Minerals Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. There are no issues from a waste safeguarding perspective.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

Q51 LPR139: Land South of Station Road (Phase 2), Market Bosworth

This site is a proposed Non-Strategic Major Allocation as defined in the Local Plan consultation (sites of 100 to 499 dwellings) and accordingly no comments are made in relation to its strategic planning policy compliance; however, Appendix B contains earlier transport comments, and the following detailed comments have been made.

The site lies within a Minerals Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

Q52 LPR70: Land East of Ratby Lane and South of Jacqueline Road, Markfield

This site is a proposed Non-Strategic Major Allocation as defined in the Local Plan consultation (sites of 100 to 499 dwellings) and accordingly no comments are made in relation to its strategic planning policy compliance; however, Appendix B contains earlier transport comments, and the following detailed comments have been made.

The majority of the site lies within a Minerals Safeguarding Area for igneous rock. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including igneous rock, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral

development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. There are no issues from a waste safeguarding perspective.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

Q53 LPR94 A: Land South of London Road (A Site), Markfield

This site is a proposed Non-Strategic Major Allocation as defined in the Local Plan consultation (sites of 100 to 499 dwellings) and accordingly no comments are made in relation to its strategic planning policy compliance; however, Appendix B contains earlier transport comments, and the following detailed comments have been made.

Part of the site lies within a Minerals Safeguarding Area for igneous rock. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including igneous rock, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it. There are no issues from a waste safeguarding perspective.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

Q54 AS455: Land North of Barton Road, Barlestone

This site is a proposed Non-Strategic Major Allocation as defined in the Local Plan consultation (sites of 100 to 499 dwellings) and accordingly no comments are made in relation to its strategic planning policy compliance; however, Appendix B contains earlier transport comments, and the following detailed comments have been made.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

County Council in its role as landowner

The proposed allocation of the Land at Barton Road, Barlestone is strongly supported.

The site which is in the sole ownership of the County Council is considered to be suitable, available and deliverable. This has been confirmed by the initial due diligence work that has been undertaken to date. Whilst the site is being promoted

by the County Council rather than a housebuilder it is the County Council's normal practice to bring sites to the market immediately on the grant of an outline planning permission in much the same manner as a private sector land promoter. This model has a successful track record having previously brought forward the initial phase of this development fronting Barton Road, as well as elsewhere across the county.

Q55 LPR95: Land at Cliffe Hill Farm (Junction 22), Markfield

This site is a proposed Employment Allocation identified in Policy SP02 of the Local Plan consultation. Strategic employment land should be allocated within existing urban areas, adjacent to existing urban areas or within sustainable locations aligned to the strategic transport network. Please note Appendix B which contains earlier transport comments and the following detailed comments.

The proposed site is adjacent but not within a Minerals Safeguarding Area for igneous rock. The A50 forms the barrier of the safeguarded area. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including igneous rock, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.

This proposed allocation is relatively close to the MQP operations at Old Cliffe Hill / Cliffe Hill and Bardon Hill Quarries (albeit the other side of the M1/A50 etc). Consideration should be given to the potential for cumulative impacts and there is therefore a need to ensure that operations at both sites are unconstrained by non-mineral development in line with the LMWLP Policy M11.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

Q56 LPR22: Land at Wapping and Harrow Farm, Watling Street (A5), Hinckley

This site is a proposed Employment Allocation identified in Policy SP02 of the Local Plan consultation. Strategic employment land should be allocated within existing urban areas, adjacent to existing urban areas or within sustainable locations aligned to the strategic transport network. Please see response to policy SP02, Appendix B which contains earlier transport comments and the following detailed comments.

The site is partly within a Minerals Safeguarding Area for Sand & Gravel. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Sand & Gravel, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development

within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

Q57 EMP1: Land at Wiggs Farm, Wood Lane/Station Road, Bagworth

This site is a proposed Employment Allocation identified in Policy SP02 of the Local Plan consultation. Strategic employment land should be allocated within existing urban areas, adjacent to existing urban areas or within sustainable locations aligned to the strategic transport network. Please see response to policy SP02, Appendix B which contains earlier transport comments and the following detailed comments.

The proposed site is adjacent but not within a Minerals Safeguarding Area for Brick Clay. The B585 forms the barrier of the safeguarded area. Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP) outlines that mineral, including Brick Clay, will be protected from permanent sterilisation by other development. Any forthcoming planning applications for non-mineral development within this Mineral Safeguarding Area should be accompanied by a Mineral Assessment of the effect of the proposed development on the mineral resource beneath or adjacent to it.

Under Policy W9 of the LMWLP it is important to safeguard waste sites. The policy grants permission for development which adjoins, is adjacent to or would locate a potentially sensitive receptor in closer proximity to an existing or permitted waste management facility where it is demonstrated that there would be no adverse effect upon amenity and the development would not prejudice the current and future operation of the facility. It appears that the allocation is directly adjacent to the waste site at the farm.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

Q58 LPR44: Land adjoining Hinckley Waste Water Treatment Works (WWTW), Brookfield Road, Burbage

This site is a proposed Employment Allocation identified in Policy SP02 of the Local Plan consultation. Strategic employment land should be allocated within existing urban areas, adjacent to existing urban areas or within sustainable locations aligned to the strategic transport network. Please see response to policy SP02, Appendix B which contains earlier transport comments and the following detailed comments.

As the land will no longer be needed for operational purposes by Severn Trent from December 2024, the proposed allocation will meet the waste safeguarding criteria in Policy W9 the Leicestershire Minerals and Waste Local Plan (LMWLP).

It is worth noting that there is a live planning application (ref: 2023/CM/0120/LCC) for land immediately adjacent to this site. It is proposed only to treat stormwater in four treatment cells. Therefore, there will still be some waste treatment taking place on the adjacent land, albeit in a very low intervention/intensity way. Proposals will need to align with LMWLP Policy W9 on waste safeguarding.

Public Health comments for this site will be made in the full HIA report to be submitted to planners by end of October.

Q59 Other or in general

No comment.

Appendix 4: Strategic and non-strategic policies

Q60 Strategic and non-strategic policies

The County Council has focused on commenting on strategic policies only and notes concern regarding the number of smaller proposed allocations put forward for consideration, the cumulative impact of which will be substantial and challenging to deal with in the provision of infrastructure.

Appendix 5: Evidence Base List

Q61 Evidence Base List

The evidence base list is incomplete (ends at L).

The County Council is aware of the situation and challenges regarding the Joint Transport Evidence being progressed with three other districts in the South of Leicestershire. There are other forms of evidence which are incomplete, for example:

- Gypsy and Traveller Accommodation Assessment to replace the Gypsy and Traveller Accommodation Needs Study 2016
- Strategic Flood Risk Assessment Level 2 (Level 1 in process of being signed off) to replace 2019 and 2020 SFRA
- Renewable Energy Strategy 2014 is unlikely to be valid given technological advancements.
- Habitat Regulations Assessment
- Sustainability Appraisal Scoping report

Other or General Comments

Q62 Other parts of the Local Plan document, or the document in general

No further comments at this time.

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