

Comments from Leicestershire County Council

Any overarching comments	Public Health and Planning at Blaby have worked closely on the policy requirement of Health Impact Assessments alongside applications for some development. Final policy wording for the Health Impact Assessment section in Policy HW1: Healthy Communities was sent May 2026. Overall Public Health are pleased to see the inclusion of policy recommendations, although note the removal of requiring a HIA on <i>‘Development in areas of public health concern including areas vulnerable to worsening health inequalities (as indicated in the guidance notes on the Leicestershire County Council webpage).’</i> It is suggested the wording is included back in policy, as has already been communicated directly to Blaby colleagues. The following sentence (or similar wording) should be included in all site allocations from Land Rear of County Hall, Glenfield (page 112) onwards where education provision contributions have not been specified. • “Provision of financial contributions towards the provision of early years, primary, secondary and special education places to meet the identified need for additional school places, where appropriate.” The Regulation 19 Local Plan for Blaby does not explicitly refer to land equalisation as a mechanism for the two main strategic sites at Whetstone Pastures and Land West of Stoney Stanton. We would therefore request that due consideration be given to land equalisation, particularly in relation to Stoney Stanton where there is also a cross-boundary element with Hinckley & Bosworth Borough Council concerning secondary provision. The plan requirement sets out 11,195 new homes, 39 hectares of local employment land and 30 hectares of strategic warehousing for the period 2025 to 2042. With regard to residential: - 6,188 new homes within the PUA - 1,765 within the two strategic standalone junctions. - 2,917 Blaby town and other larger villages - 1,487 medium villages and non-strategic sites - 116 from small villages. These values demonstrate as a proportion of overall delivery, the two standalone strategic allocations comprise only circa 15% of total housing provision. There are two important implications of this which should be noted. 1. This leaves a significant balance of housing provision which will not benefit for its impacts and infrastructure being accommodated and catered for through
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strategic policies and proposals, a situation addressed in Charnwood through the development of a CIL. 2. The spatial allocation and geographical commitment of two significant strategic allocations will be fixed, but from the perspective of an evidence base that only considers a small proportion of their overall quanta. i.e. for Land West of Stoney Stanton (LWoSS) 965 dwellings out of 5,165 (19%) and for Western Pastures (WP) 800 dwellings out of 4500 (18%).

In short, the evidence and forecast period has determined, based on the impact of 1,765dws (800+965) the appropriateness and acceptability of these two allocations which together present a total of 9,665dws when fully delivered. The plan alludes to the requirement for strategic infrastructure by way of a new M1 J20a and south facing slips onto the M69 as being required by virtue of land safeguarding however provides no commitment or requirement for these over the plan period. The consultation plan is therefore silent on the delivery approach, contribution strategy or viability implications of these significant infrastructure requirements over the plan period and beyond.

Whilst no requirement is included in the plan policies, it is anticipated that each strategic allocation (Whetstone Pastures and Land West of Stoney Stanton) would come forward as singular outline planning application. The assessment and determination implications of this is very important. Whilst only a proportion of the allocations are presented and considered through the Plan testing and infrastructure requirements set out, in order to realise housing delivery on these sites an application will have first been submitted to and approved by the relevant determining authority. This will therefore have considered the full scale of development sought and thus assess the impacts of, and develop mitigation strategies for, the full site allocation. The delivery approach, contribution strategy and viability implications of these significant infrastructure requirements will therefore need to be considered in detail over the plan period and necessary to ensure that the allocations are brought forward in an appropriate and policy compliant manner. The absence of relevant details, evidence and delivery mechanisms presents a real risk that these sites may not be deliverable at all over the plan period which will have a significant impact on housing delivery.

Allied to the above it is highly likely that due to the infrastructure requirements that are anticipated to be required to deliver the full scale of development sought, determination of these applications could in the end be via Development Consent Order as Nationally Significant Infrastructure Projects (NSIP). We have raised this risk with the LWoSS team who are confident the provision of slips may not trigger an NSIP though it is unclear if they have discussed or confirmed that position with Blaby District Council. In either case though the determination of such an application would look to the Local Plan policy for its policy requirements or delivery mechanism and as presently drafted there are significant gaps in the plan.

Similarly, based on other available evidence and assessment it is probable that comprehensive strategic interventions are required, and could be sufficient to deliver the scale of growth proposed over the plan period and as presented. It is also reasonable to predict that the cost of this infrastructure may well exceed what any one development could support in isolation and therefore a district wide strategy to deliver necessary infrastructure would typically be expected. As presented in the bullet point list above, the spatial strategy proposed includes several thousands of houses that will impact and could reasonably be

expected to proportionately fund necessary infrastructure. The transport evidence supporting the plan provides no support to such an endeavour and nor does Policy INF1: Developer Contributions (Strategic) other than in very general and vague terms.

A review of the Blaby Local Plan Infrastructure Delivery Plan June 2026 indicates that para 3.4.18 reads *as of June 2026, the work that SLR are undertaking to refine and confirm the scale and form of highway mitigation required is ongoing*. Notwithstanding this, localised schemes and improvements have been developed and costed in support of the plan (e.g. para 3.4.24 circa £27,943,000) but concludes *existing traffic levels are already high and the resulting does not therefore represent mitigation wholly related to the Local Plan growth...as such it is assumed at this stage that the majority of the junction interventions will be funded via Leicestershire County Council*. This is a very unusual approach and it is unclear to what extent the stated infrastructure and Local Plan evidence is used to draw conclusions over the necessary infrastructure costs to support the Plan and which will feed through to site and plan viability calculations. Notwithstanding this, strategic infrastructure proposals are notable by their absence and therefore do not appear to feature either as a necessary requirement to support the spatial strategy proposed nor in line with the Strategic Growth Plan which provides an agreed framework to use when preparing individual Local Plans.

Turning to employment land, whilst it is understood that the ability to front load infrastructure for residential development is difficult owing to the slow build out and occupation timescales, the opportunity to utilise employment land for this purpose appears to be missed. A very even split of employment floorspace is shared between the WP and LWOSS sites, 25,600sqm each with 22,400 each left for beyond the 2042 plan period. Additional land safeguarded *beyond the plan period* totalling 420,000sqm is indicated. Given the opportunity to utilise the viability and cashflow benefits of this employment development it is unclear why this would be reserved for beyond the plan period. Detailed viability and delivery phasing may well show that this could enable earlier delivery of strategic infrastructure and therefore further clarification and explanation of this approach should be shared.

To summarise site specific comments are as follows:

Land West of Stoney Stanton

- Developer land holding (red line shown) only includes slip on western side of M69. Unorthodox eastern slip arrangement not expected to be technically compliant.
- Employment land safeguarded west of M69 indicated beyond the plan period yet this is probably required to fund M69 works.
- No agreement on evidence to say 965dws can be delivered before the M69 slips.
- Fundamental reason for refusal of HNRFI included the highway safety impact in Sapcote in part brought about by south facing slips and induced demand through villages. Blaby District Council objected on these grounds. What strategic evidence is available to show that the Stoney Stanton link road mitigates impacts in Sapcote and if so when is this required by? In effect all eggs are in one basket with this and we are not aware how thoroughly it has been tested.

	- No viability evidence to support LWoSS to demonstrate necessary infrastructure is affordable without wider funding. If so no strategy or mechanism is yet provided for this. The Local Plan may therefore allocate an undeliverable site as presented. - What policy or evidential backing does inclusion of a new rail station between Hinckley and Narborough have? This was explored through the HNRFI and feedback from Network Rail was that it wouldn't stack up in patronage or timetabling terms. - The IDP is silent on strategic infrastructure, whilst the Local Plan makes reference to the potential for CIL or pooled contributions, the transport evidence base is severely lacking from the perspective of providing meaningful support to infrastructure that is expected to be required to deliver the scale of growth indicated. - Transport evidence discounts M1 J21 impact yet this formed a fundamental part of BDC objection to HNRFI. Strategic Growth Plan provides valuable evidence for J20a being supportive to lessening impacts at J21 yet this part of the narrative appears to be missing from the Plan. - Has a comprehensive assessment of the full scale of development been undertaken and if so consideration to the anticipated infrastructure and phasing requirements? If this is being left to the Development Management process this poses significant risks of unknowns and non-delivery. If wider contribution is required to the ultimately determined mitigation requirements that are determined through an application that will be forthcoming over the plan period (if accepting it won't all be built over the plan period) then the opportunity to utilise the plan to pool necessary contributions could be lost. Whetstone Pastures - The policy safeguards 280,000 sqm employment land until completion of a new motorway junction on the M1. How therefore is this envisaged to be delivered? What transport evidence is this policy position based on? Is a J20a in isolation acceptable or is wider east west connectivity also required or complementary improvements brought about by induced demand of a new motorway junction? These do not appear to be captured in the Plan. - 800 dwellings are indicated to be deliverable over the plan period however the evidence for this is unconfirmed. - Has a comprehensive assessment of the full scale of development been undertaken and if so consideration to the anticipated infrastructure and phasing requirements? If this is being left to the Development Management process this poses significant risks of unknowns and non-delivery. If wider contribution is required to the ultimately determined mitigation requirements that are determined through an application that will be forthcoming over the plan period (if accepting it will not all be built) then the opportunity to utilise the plan to pool necessary contributions could be lost.
Section	Specific comments (please include paragraph numbers/page numbers where relevant)
Chapter 1: Introduction	Under the 'sub-regional planning' title, the wording should include reference to LTP4 and describe how the Local Plan will help to deliver on its Core Themes and Policies.

	Within paragraph 1.14, reference should make mention of any emerging/future Neighbourhood Plans as these are likely to be ‘Made’ within the lifetime of the Local Plan. In paragraph 1.15, it would be helpful to set out the support the LPA will provide to a Neighbourhood Plan group, should a review of the Neighbourhood Plan be required following Local Plan adoption. It would also be useful to mention LNRS to be embedded within policies as part of Local Green Spaces paragraph.
Chapter 2: Spatial Portrait, Vision and Objectives	We welcome Environment and Climate Change objectives, especially on resilience and climate change adaptation and efficient use of resources, minerals and waste. Paragraph 2.2 under Spatial Portrait has a word missing, it should read “It is helpful to reflect on the character of the Blaby <i>District...</i>” Paragraph 2.3 under Spatial Vision, could include reference to new communities. Paragraph 2.5 under Spatial Vision references education, communities and leisure facilities. Whilst it is good to see this in the context of the emerging LTP4 Enabling Travel Choice Strategy (ETCS) this text needs to be modified to pick up on the language of the ETCS, i.e. Plan needs to play its role in enabling travel choice to such places. This also needs to be reflected in the site specific policy content. E.g. where is this relationship identified and the need to enable access to such required to be a consideration of new development? Paragraph 2.14 under Spatial Portrait includes the text “...in much of the District’s road network is under significant pressure and operating at or close to capacity and further growth will need to be supported by road capacity enhancements and improvements to active travel infrastructure.” The Plan needs to reflect current issues in and around M1 J21 and the M69. From the LTA’s perspective, the Plan’s transport evidence base at present fails to provide sufficient understanding and analysis of the Plan’s spatial strategy’s forecast transport impacts. meaning at present the Plan cannot properly demonstrate how its policies and the Plan's proposed funding mechanism have been developed in response to that evidence, including how they will help to address cumulative and cross-boundary transport impacts. Under the ‘Strategic Objectives’ heading, the Infrastructure sub-heading should be amended to ‘Infrastructure and Services’. Paragraph 15 under this heading, “To work with partners to ensure the timely provision of infrastructure needed to support existing and new communities” should be amended to explicitly include reference to securing funding, too.

	<u>Comments from an LCC Landowner Perspective</u> Whilst the vision and objectives are largely supported, the following objective could be included in the housing section “To maintain and enhance the vitality of our settlements by the provision of additional high quality housing and business opportunities to support their continued role as thriving self-sustaining communities.
Chapter 3: Spatial Strategy	
Policy S1: Location and Growth Strategy	The supporting text includes the following wording “However, as we move towards the end of the Plan Period and beyond, in line with the vision and objectives outlined in the Blaby and Leicester and Leicestershire Strategic Growth Plans, and the aspirations of our local communities, there will be greater emphasis on delivering growth in new communities.” It is considered that the ‘transport strategy’ for enabling the Plan’s effective delivery needs to reflect this. But, at present from the LTA’s perspective, the Plan’s transport evidence base at present fails to provide sufficient understanding and analysis of the Plan’s spatial strategy’s forecast transport impacts. meaning at present the Plan cannot properly demonstrate how its policies and the Plan’s proposed funding mechanism have been developed in response to that evidence, including how they will help to address cumulative and cross-boundary transport impacts. <u>Comments from an LCC Landowner Perspective</u> Policy S1 sets out the overall spatial development strategy for the District over the period to 2042. It sets out a minimum housing requirement of 11,195 homes, 39 hectares of local employment land and 30 hectares of strategic employment land and sets out the settlement hierarchy with settlements grouped according to the level of local services, access to public transport and access to employment opportunities; Paragraphs 3.7 to 3.11 setting out the supporting text and evidence base all of which appear appropriate
Policy S2: Strategy for Housing	There is no mention that housing numbers are provided for Neighbourhood Plan areas, which are then included within their plans. <u>Comments from an LCC Landowner Perspective</u> Table 1 sets out a total of 12,953 homes to be delivered in the period to 2042 which are to be distributed across the settlement hierarchy and ensuring that growth takes place in the most sustainable settlements and recognising that large strategic sites can provide sustainable locations for growth. It is noted that the proposed housing numbers include a c. 15% buffer to provide flexibility and take account of any future non-delivery. However, it is considered that the total housing number should also reflect the potential shortfall in affordable housing the need for which currently stands at 536 homes per annum and accordingly a further increase in the buffer to say 20% would help to improve the current position.

	Whilst the distribution of housing across the settlement hierarchy broadly meets expectations in respect of medium villages it is noted that the distribution of housing numbers between the various settlements is uneven with no sites allocated in Croft to help sustain the primary school and other essential local services in addition to delivering much needed affordable housing. It is therefore suggested that the County Council's site at Poplars Farm Croft (SHELAA ref CRO006) situated in a sustainable location immediately adjoining the village envelope which is considered to be available deliverable and developable be allocated to meet Croft's ongoing housing needs.
Policy S3: Strategy for a Prosperous Economy	We welcome and support Policy S3. There is an opportunity to change criterion G to '<i>Supporting local businesses to participate in the green <u>and circular</u> economy; and</i>' <u>Comments from an LCC Landowner Perspective</u> Policy S3 is broadly supported recognising that it aligns with the wider employment needs of the Leicester and Leicestershire economic area.
Policy S4: Site Allocations for Housing	We welcome reference to Site Selection Methodology Report 2026 which includes individual site assessments. We have previously commented on Minerals and Waste safeguarding issues for individual sites. Whilst the Minerals safeguarding issues are frequently mentioned in the Plan, waste safeguarding issues do not seem to be. There may be cumulation with other large-scale developments on waste and waste water infrastructure. This is in addition to the waste safeguarding issues regarding the ability of the site to continue to operate or extend if sensitive uses are developed closer to it (NPPF 'agent of change' and LMWLP Policy W9 are relevant considerations). <u>Comments from an LCC Landowner Perspective</u> Policy S4 sets out the proposed housing allocations and the expected numbers to be delivered during the plan period. In addition to the Land West of Stoney Stanton SDA the County Council as landowner strongly supports the allocation of sites H1E – Land east of Lutterworth Road, Blaby and H1O – Land at Steeplechase Farm, Kilby for which separate detailed responses will be submitted. Further, it is confirmed that both are available and deliverable with proposed housing numbers being delivered within the plan period in accordance with the proposed trajectory.
Policy S5: Site Allocations for Local and Strategic Employment Uses	No comments. <u>Comments from an LCC Landowner Perspective</u>

	The allocation of strategic and local employment within the Land West of Stoney Stanton SDA is supported.
Policy S6: Comprehensive Development and Masterplanning of Strategic Sites	There is some welcome wording in this policy that reflects the Enabling Travel Choice Strategy. Under Policy wording part C, ii, the text should include “...in places beyond the development;” at the end of the paragraph. Under Policy wording part C, iv, it is not clear how developers will engage with local communities, to ensure the integrated and mixed-use communities, as highlighted in the wording. Under Policy wording part E, vii, “Infrastructure Delivery, Phasing and Management Strategy;”, it is queried whether this policy needs to include a general point about safeguarding for the future delivery of strategic infrastructure, including transport, in line with the relevant site specific policies. In the supporting text under ‘Land West of Stoney Stanton Strategic Site’, the text reads “The Site will be delivered in a phased manner and the later phases of development will be infrastructure led, supported in the longer term by the delivery of south facing slip roads at the existing motorway junction as well as new primary schools, secondary school, local centres, health care and other community facilities.” There is nothing the Plan’s transport evidence at present to evidence this statement, and in any event as Policy S7 acknowledges, at least the B8 element of the development is dependent on the provision of the south facing slips. <u>Comments from an LCC Landowner Perspective</u> The County Council’s response as a landowner will form part of the wider response to be submitted separately in respect of Land West of Stoney Stanton.
Policy S7: Strategic Site – Land West of Stoney Stanton	Some elements of the Policy reflect the emerging Enabling Travel Choice Strategy, but there needs to be more of a focus on developing evidence to understand where residents of this new place might need to access services and facilities in the world beyond the development and how that access (connectivity) is to be provided for by an appropriate choice of travel. Regarding Policy S7, under Employment, Point 10, the text reads “The development of this part of the site will be subject to the provision of new slip roads onto junction 2 of the M69 and is likely to be delivered beyond the Plan period”, there is however, no policy safeguarding for the provision of the slip roads.

	Regarding Policy S7, under Transport Infrastructure, Point 20, the text reads “A Mobilisation and Active Travel Strategy conforming to the Council’s Local Plan Transport Strategy will be prepared and submitted with a planning application. The transport strategy has not yet been made available. Under the support text, Part C, The development of this part of the site will be subject to the approval and commencement of new slip roads onto junction 2 of the M69 and is likely to be delivered beyond the Plan period. The word ‘commencement’ should be replaced with the word ‘delivery’. Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the Local Plan is adequate to facilitate and guide appropriate consideration through the planning process. We welcome measures to prevent sterilisation of the mineral resources within the site and within 500m of the site. It would be helpful to know what, if any, support the LPA would provide for creation of Parish Council and Neighbourhood Plan for a new community. There is no mention of LNRS in Neighbourhood Policies either under the Open Space or Environment sections. <u>Comments from an LCC Landowner Perspective</u> The County Council as part owner of the site and co-promoter of the proposed Strategic Development Area strongly supports its allocation as a Strategic Site. A separate detailed consultation response will be prepared and submitted in respect of this and the wider plan policies.
Policy S8: Strategic Site – Whetstone Pastures	Regarding paragraph 24, The existing wording is focussed on not making flooding worse. A stronger position would be to push the NPPF requirement for development to ‘<i>where possible...reduce flood risk overall</i>’. Existing wording: 24. Make provision for a drainage and water management strategy for the site to ensure the development does not increase flood risk on site or downstream including in relation to the Whetstone Brook, together with the provision of a sustainable drainage system incorporating natural flood management principles in accordance with flood risk and drainage policies set out elsewhere in this plan. Requested amended wording:

	<i>24. Make provision for a drainage and water management strategy for the site to ensure the development reduces fluvial flood risk downstream in relation to the Whetstone Brook, together with the provision of a sustainable drainage system incorporating natural flood management principles in accordance with flood risk and drainage policies set out elsewhere in this plan.</i> Some elements of this Policy reflect the emerging Enabling Travel Choice Strategy, but there needs to be more of a focus on developing evidence to understand where residents of this new place might need to access services and facilities in the world beyond the development and how that access (connectivity) is to be provided for by an appropriate choice of travel. On Point 18, under Transport Infrastructure, “<i>Land to be protected from built development within the site for the provision of a new Junction onto the M1 Motorway (Junction 20a), together with local capacity and safety enhancements to the A426 and Willoughby Road to accommodate the new junction. Further land to the east of the junction to be laid out so as not to prejudice the delivery of a future growth corridor needed to facilitate long term growth to the south and east of Leicester.</i>”) it is considered that whilst other evidence exists to demonstrate the in principle need for such, at present there is nothing in the Plan up to this point that leads any one reading it to see this as a natural conclusion of a narrative, nor will the Inspector see anything in the Plan’s transport evidence base that would justify this. Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the Local Plan is adequate to facilitate and guide appropriate consideration through the planning process.
Policy S9: Land to the North of the A47 Hinckley Road, Kirby Muxloe - Strategic Development Site [Hastings Fields Phase 2]	Some elements of this Policy reflect the emerging Enabling Travel Choice Strategy, but there needs to be more of a focus on developing evidence to understand where residents of this new place might need to access services and facilities in the world beyond the development and how that access (connectivity) is to be provided for by an appropriate choice of travel. Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the Local Plan is adequate to facilitate and guide appropriate consideration through the planning process.
Policy S10: Land West of Beggars Lane, Lubbesthorpe - Strategic Development Site	Regarding Paragraph 1E, it is not clear why this policy wording is different from the wording in S7, S8 and S9. This leaves this policy with no real reference to the Enabling Travel Choice Strategy.

	Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the Local Plan is adequate to facilitate and guide appropriate consideration through the planning process. As above
Policy S11: Land at Carlton Park, Narborough - Strategic Development Site	We welcome the requirement for the carrying out of a Minerals Assessment. This should be in line with Policy M11 of the LMWLP (typo states M1 at p.67). Regarding Policy Point 4J under Transport Requirements, it is not clear why this policy wording is different from the wording in S7, S8 and S9. This leaves this policy with no real reference to the Enabling Travel Choice Strategy. Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the Local Plan is adequate to facilitate and guide appropriate consideration through the planning process.
Policy S12: Land South of Whetstone - Strategic Development Site	Regarding Paragraph 8, under Transport Infrastructure, it is not clear why this policy wording is different from the wording in S7, S8 and S9. This leaves this policy with no real reference to the Enabling Travel Choice Strategy. Regarding Paragraph 10, the existing wording could be misinterpreted to be focussed on addressing fluvial flood risk 'within the site'. The proposed amendment makes clear the focus should be on providing downstream betterment. As above, this focus is in accordance with the NPPF requirement for development to 'where possible...reduce flood risk overall'. Existing wording: <i>10. The development will be required to deliver a drainage and water management strategy to address areas of fluvial flood risk associated with the Whetstone Brook and surface water flows within the site. A sustainable drainage system based on natural flood management principles in accordance with Policy CC2 Flood Risk is required. No built development outside of Flood Zone 1.</i> Requested amended wording: <i>10. The development will be required to deliver a drainage and water management strategy that reduces fluvial flood risk downstream associated with the Whetstone Brook and mitigates surface water flood risk within the site. A sustainable drainage system based on natural flood management principles in accordance with Policy CC2 Flood Risk is required. No built development outside of Flood Zone 1.</i>

Policy S13: Strategy for Retail and Leisure and Network of Centres	No comments
Policy S14: Strategy for Gypsies and Travellers and Travelling Show Persons	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. The HIA made particular recommendations to strengthen policy wording from a health perspective. Recommendations that have not been taken forward but Public Health would welcome the inclusion of are: • Strengthen consideration of cumulative environmental impacts, particularly noise, air quality and traffic, where sites are located near major roads or infrastructure, to ensure satisfactory living conditions are maintained over time The same principles for site allocation for housing sites apply, and therefore a further criterion should be added on the need to avoid the sterilisation of mineral in line with LMWLP Policy M11 and also another on the need to for not introducing sensitive uses adjacent to operational safeguarded waste sites in line with LMWLP Policy W9. Also, seems to need rewording as doesn't quite make sense: <i>'Restricting development within Green Wedges and Areas of Separation. Gypsy and Traveller accommodation as it is likely to be contrary to Policy S16 and Policy S17.'</i>
Policy S15: Design and Place-making	We welcome the policy and note the 'agent of change' principles which should help safeguard existing minerals and waste sites.
Policy S16: Green Wedges (Strategic)	We welcome the recognition that minerals extraction could be acceptable in Green Wedges. Could certain waste development (open windrow or farm scale AD for example) also be acceptable, subject to not being harmful and other exceptions?
Policy S17: Areas of Separation	The policy is welcomed, however the suggestion is then made to the potential of new settlements being reliant of provision within existing settlements for community cohesion/establishment.
Policy S18: Countryside	No comments
Chapter 4: Climate Change and Flooding	
Policy CC1: Planning for Climate Change	Policy Point 2A: This requirement could be enhanced by specifying a preference or hierarchy for green SuDS and not grey SuDS such as permeable paving. This would assist in ensuring compliance with B which rightly requires 'multi-functional green and blue infrastructure' by ensuring that SuDS for drainage are also valuable green/blue amenity spaces. Green SuDS in place of permeable paving could also minimise the urban heat island effect. Policy Point 2D: There is little value to this requirement given that it is Building Regulations. It is recommended to enforce a stricter standard such as 95 litres/person/day.

	Furthermore, there is no mention of measures required to prevent internal overheating of new homes. This needs to be rectified. A new point should be added to (2) to ensure developers are specifying measures to prevent unwanted solar gain (rather than relying on openable windows) such as external shading or orientation. Building Regulations Part O is unlikely to be sufficient to prevent overheating during heatwaves in itself.
Policy CC2: Flood Risk	It is noted that Paragraph 6 relates to easements on development close to Main Rivers (Environment Agency regulated). Please can Blaby DC consider adding a line to this policy in relation to ordinary watercourses as highlighted below. Whilst the Lead Local Flood Authority has guidance on easements on ordinary watercourses, it is not set in any policy and can be difficult to enforce due to weak national policy. There has been a recent instance of development in Blaby which has severely encroached on an ordinary watercourse, having a negative impact on flood risk and ecology. <i>6. Where development is proposed close to or adjoining a Main River an 8m easement will be required to be kept from the top of the bank. For proposed development close to an ordinary watercourse, an easement of 4.5m is required (or a 3m easement if the channel width is less than 2m) to be kept from the top of the bank. This is necessary to ensure that an appropriate buffer is provided to enable access for maintenance and during a flood event, and to make space for water as well as protect and enhance wildlife habitat adjacent to watercourses.</i> Additionally, the LLFA would like to see a strengthening of wording for the two strategic development sites on the Whetstone Brook catchment. Whetstone has suffered devastating flooding over the past 2 years and it is essential that new development upstream of Whetstone contribute to the reduction in flood risk downstream as required by the NPPF. The policy would also benefit from the specification of rainfall events for which compliance should be demonstrated to give developers something more solid to respond to, e.g. 1 in 100 or 1 in 1,000 year events. The policy should also specify that development should not lead to increased flood risk within the development area, locally outside of the development area or downstream within the catchment. To aid in this, it is suggested that the policy could seek to minimise the area of hard standing specified by ensuring that the minimum area required to meet homeowners' needs is paved or covered with impermeable services. Others areas should be permeable and ideally multi-functional.
Policy CC3: Water Quality, Supply and Wastewater	We welcome the policy and the recognition of the importance of providing for both water and wastewater in a coordinated fashion, however as per Policy CC2, consideration should be given to specifying a stricter water consumption standard such as

	95 litres per person per day. Consider also incentivising grey water collection facilities for non-potable uses and the requirement for water butts for rainwater collection.
Policy CC4: Renewable and Low Carbon Energy	No comments
Chapter 5: Conserving and Enhancing the Natural and Historic Environment	
Policy ENV1: Biodiversity and Geodiversity	No comments
Policy ENV2: Green and Blue Infrastructure	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. The HIA made particular recommendations to strengthen policy wording from a health perspective. We note the tightening of Policy E (paragraph 4) wording to better reflect how the built environment can actively encourage healthy behaviours, such as walking and cycling, but would still recommend the additional text: <i>'including everyday journeys like walking to school and convenience shops'</i> Other recommendations that have not been taken forward but Public Health would welcome the inclusion of are: • Strengthen protection of existing green and blue infrastructure, with clearer policy emphasis on retention and enhancement rather than replacement, recognising their established health and wellbeing value. • Reinforce the importance of accessibility to green and blue spaces, explicitly linking access to positive health and wellbeing outcomes for all. • Enhance the Policy E checklist by integrating Health Impact Assessment principles. Public Health and Active Together could support the development and future iterations of the checklist. • Address gaps in the checklist, including explicit consideration of community needs and aspirations, signage, and the quality and inclusivity of access, particularly for people with disabilities. • Broaden the supporting text (paragraph 5.6) to reflect a whole-life-course approach, ensuring benefits for children, working-age adults, and older people, alongside recognition of the voluntary and community sector • Strengthen mitigation expectations where green and blue infrastructure is lost, requiring contributions to improve both new and existing spaces, including the quality, safety, and accessibility of rights of way and path networks. • Reference the LCC Value of Trees Strategy to ensure that new planting delivers appropriate species in the right locations, maximising climate resilience, health benefits, and long-term sustainability. • Reference the Joint Health and Wellbeing Strategy 2022-2032 (recommended by both Public Health and Town and County planning Association (TCPA))

Policy ENV3: Trees and Hedgerows	It is considered that a helpful addition would be a sentence or extra point that requires developers to fund or supply aftercare of newly planted hedgerows, trees and other vegetation, including the replacement of specimens that die during establishment.
Policy ENV4: Landscape and Settlement Character	The text around protecting rural characteristics is welcomed.
Policy ENV5: Heritage and Culture	It is suggested that reference should be made to using Local Area Coordinators and cultural services to deliver inclusive engagement that integrates new and existing communities, strengthens social cohesion, and supports participation in the design and use of local places/buildings. At paragraphs 5.33 & 5.34, it is welcomed that the mention that Neighbourhood Plans might have additional identified heritage assets which should be taken in consideration. It is assumed that separate number points identify discrete policy components. However, point 2 ends with a colon, followed by a sub-title and then begins a new point 3 followed by (3) A-D. 3/3A-D should be read as part of 2. 4 Begins a new point, with 5-7 as sub-components of 4. It is recommended that for clarity that 3 is renumbered 2.1. 4 should be renumbered 3, with 5-7 renumber 3.1, 3.2. and 3.3. The policy identifies designated heritage assets as including Listed Buildings, Scheduled Monuments and Conservation Areas, the NPPF Annex 2 includes Registered Parks and Garden and Battlefields as well as World Heritage Sites, also Protected Wreck sites). Currently there are no RPGs, RBs or WHS in BDC, which is assumed as the reason for their exclusion, it is however, recommended that the policy references the wider NPPF definition. It might also note that not all assets of an equivalent significance to designated asset have been so designated, Non-designated heritage assets of an equivalent significance should be treated as designated assets (NPPF note 75). In the supporting text at paragraph 5.33 Re list of Designated heritage assets see above. Further within paragraph 5.33, Remove reference 'or Historic England via the Heritage Gateway', the Heritage Gateway is neither intended for a development management purpose nor supported adequately to deliver the information for the purpose described. The NPPF para 207 directs the LPA and developers to the principal source of data maintained for this purpose is the Historic Environment Record referenced in full below (5.35).
Policy ENV6: Minerals Safeguarding Areas	Welcome inclusion of this policy. Including reference in the wording to both the Leicestershire Minerals and Waste Local Plan policy or successor policies would be prudent. Whilst a new M&WLP has not formally started yet, there are publicly available documents which outline that it will (not to mention, Government require us to start one).

Chapter 6: Housing	Chapter makes no mention of Neighbourhood Plan sites and whether any collaboration has taken place with Neighbourhood Plan Groups. If there is, this should be referenced similar to Policy H1C.
Policy H1A: Land Rear of County Hall, Glenfield	No comments
Policy H1B: Land at Kingstand Farm and Golf Course, Leicester Forest East	Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process.
Policy H1C: Land off Lutterworth Road, Blaby	Paragraph 6.19: Welcome the inclusion of identified site with Blaby Neighbourhood Plan to demonstrate the importance of sites allocated within Neighbourhood Plans as well as those within the Local Plan.
Policy H1D: Land at Keepers Farm, Lutterworth Road, Blaby	No comments
Policy H1E: Land East of Lutterworth Road, Blaby	Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process. <u>Comments from an LCC Landowner Perspective</u> See earlier comment under Policy S4.
Policy H1F: Land South of Maurice Drive and Gillam Butts, Countesthorpe	No comments
Policy H1G: Land West of Peatling Road, Countesthorpe	Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process.
Policy H1H: Land West of Broughton Road, Cosby	No mention in policy or supporting text of Minerals Safeguarding Areas.

Policy H1I: Land South of Narborough Road, Huncote	Previously flagged that it appears that the site is within Minerals Safeguarding Areas for Sand & Gravel and Igneous rock. Any allocation and future applications would need to be informed by/ accompanied by an assessment of the potential mineral resource adjacent and within the allocation in line with the LMWLP Policy M11. Appears to adjoin Croft Quarry, so needs to be in line with Policy M11 and M12. Site is more distant from waste sites and separated by the village but should also have regard to safeguarded waste sites and Policy W9. Acresford Sand & Gravel (B10, safeguarded in Document S1/2015). Greens Lodge Farm (B9, safeguarded in document Document S1/2015) is more distant to the northeast. Note that the supporting text simply says <i>'Pollutants and contaminants arising from previous uses of land and the proximity of Croft quarry will be considered through the application'</i> . And that an active aggregates quarry is located approximately 150 metres to the south.
Policy H1J: Land at Springfield Farm, Forest Road, Huncote	Previously flagged as in a Minerals Safeguarding Area and also with waste safeguarding issues. The policy text contains the following <i>'10. Consideration of land contamination impacts and mitigation relating to the site's proximity to a historic landfill site; and 11. Consideration of odour impacts and mitigation related to the anaerobic digestion plant located to the north of the site'</i>. Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process.
Policy H1K: Land South of Warwick Road, Littlethorpe	No mention in policy or supporting text of Minerals Safeguarding Areas. Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process.
Policy H1L: Land South of Hinckley Road, Sapcote	No mention in policy or supporting text of Minerals Safeguarding Areas. Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process.
Policy H1M: Land West of Huncote Road, Stoney Stanton	Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and

	archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process.
Policy H1N: Land at Church Farm, Station Road, Elmesthorpe	Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process.
Policy H1O: Land at Steeple Chase Farm, Main Street, Kilby	No mention in policy or supporting text of Minerals Safeguarding Areas. Site specific policies outlined in the LP (H1B, E, G, J, K, L, M, N, O, etc.). Heritage is generally included adequately throughout as a relevant material consideration, while individual site assessment strategies may vary in practice, subject to the character and archaeological implication of schemes as brought forward, the general context as outlined in the LP is adequate to facilitate and guide appropriate consideration through the planning process. <u>Comments from an LCC Landowner Perspective</u> See earlier comment under Policy S4.
Policy H1P: Land West of Coventry Road, Sharnford	No mention in policy or supporting text of Minerals Safeguarding Areas.
Policy H1Q: Land at Hill View Nurseries, Thurlaston	No comments
Policy H1R: Land off Croft Road, Thurlaston	No comments
Policy H2: Affordable Housing	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. The HIA made particular recommendations to strengthen policy wording from a health perspective. Recommendations that have not been taken forward but Public Health would welcome the inclusion of are: • Clarify space standards for affordable housing, confirming that national minimum space standards apply to both internal space and private or shared outdoor space, including minimum garden space provision. • Strengthen expectations around outdoor space and shade, and indoor sunlight, ensuring affordable homes have comparable access to gardens, surrounding green infrastructure and sunlight as market housing, to help reduce health inequalities linked to green space deprivation.

	• Where viability and flexibility is made on proposals of 100% affordable housing, the quality of build and surrounding area must still provide for high quality of life outcome. • Provide clearer definitions within the policy, particularly around what constitutes a “negative impact on a mixed community” and “exceptional and authenticated site development costs,” to support consistent interpretation. <u>Comments from an LCC Landowner Perspective</u> Overall, Policy H2 is supported and, in particular, the provisions within Para H2.1 and H2.3 which facilitate both an adjustment to the tenure mix and the level of provision on viability grounds noting that any adjustment should be agreed at the application stage. Further, the policy at H2.4 to H2.6 relating to rural exception sites is also supported especially the recognition that cross subsidisation by the provision of market housing is acceptable to secure the delivery of the affordable housing subject to at least half the dwellings provided being affordable.
Policy H3: Housing Mix and Density	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. Public Health welcome the inclusion of all recommendations made to this policy. <u>Comments from an LCC Landowner Perspective</u> Policy H3 reflects the evidence of the HENA and is therefore seen as realistic.
Policy H4: Specialist and Accessible Accommodation	Support the provision of accessible and adaptable homes that promote equality, including options for younger people with additional needs or requiring supported living, social rent requirements etc.
Policy H5: Self and Custom Build Housing	Policy H5, Point 4: Welcome the inclusion and encouragement for Neighbourhood Plans to identify suitable sites for custom builds in their area and the recognition that Neighbourhood Plans are a suitable mechanism for this best deciding where these could be located within their communities. <u>Comments from an LCC Landowner Perspective</u> Policy H5 aligns with local plan policies across the HMA and contains the safeguard to the developer enabling unsold plots to be developed as market housing in the event of no proven demand following a 12 month marketing period which is strongly supported.
Chapter 7: Health and Well-being	

Policy HW1: Healthy Communities	Public Health and Planning at Blaby have worked closely on the policy requirement of Health Impact Assessments alongside applications for some development. Final policy wording was sent May 2026. Overall Public Health are pleased to see the inclusion of policy recommendations, although note the removal of requiring a HIA on ‘<i>Development in areas of public health concern including areas vulnerable to worsening health inequalities (as indicated in the guidance notes on the Leicestershire County Council webpage)</i>.’ It is suggested the wording is included back in policy, as has been emailed directly to Blaby colleagues. Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. Public Health welcome the inclusion of all recommendations made to this policy. Recommendations that have not been taken forward but Public Health would welcome the inclusion of are: • Strengthen alignment with national policy Refine wording on hot food takeaways to match the NPPF, including clear expectations on proximity to schools, parks and youth destinations, and how cumulative impacts will be assessed. • Reinforce emphasis on inequalities and life-course needs Enhance references to addressing health inequalities and ensure open space and health-supporting infrastructure meet needs “across the life course.” • Include explicit strategic linkage Add a reference to the <i>Leicestershire Joint Health and Wellbeing Strategy 2022–2032</i> to support coherence with wider health priorities. It is further suggested that the use of Local Area Coordinators and cultural services could help to deliver inclusive engagement that integrates new and existing communities, strengthens social cohesion, and supports participation in the design and use of local places/buildings.
Policy HW2: Open Space, Sport, and Recreation	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. The HIA made particular recommendations to strengthen policy wording from a health perspective. Recommendations that have not been taken forward but Public Health would welcome the inclusion of are: • Strengthen reference to climate resilience in the design and location of open spaces, including provision of shade, shelter, sustainable drainage and year-round usability to respond to climate change and extreme weather. • Reference recognised quality standards, such as the Fields in Trust 2024 guidance, to support delivery of high-quality, inclusive and multifunctional open spaces, including sensory and inclusive equipment, natural play and flexible use. • Encourage alignment with Sport England’s Active Design principles, to strengthen the policy’s contribution to physical activity, movement and everyday active travel through well-designed environments.

	• Encourage greater consideration of safety in open spaces, including aspects such as street lighting, signage, seating, natural surveillance and legibility, to help spaces feel safe and welcoming throughout the day and year. • Strengthen the policy's emphasis on community use, drawing more clearly on the principles set out in paragraph 6 of the Open Space policy to support shared use, social value and wider community benefit. • Promote inclusive design approaches across open space and recreation provision and management, helping to ensure spaces are accessible, welcoming and usable for a wide range of users, including women and girls, older people, disabled people, neurodiverse people, people from different cultural backgrounds and diverse communities.
Policy HW3: Ground Conditions, Pollution and Health	No comments
Policy HW4: Air Quality	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. The HIA made particular recommendations to strengthen policy wording from a health perspective. Recommendations that have not been taken forward but Public Health would welcome the inclusion of are: • Strengthen policy wording on air quality protection, clarifying that development <i>must not</i> lead to a significant deterioration in air quality, reflecting the existence of legally binding air quality limits. Where this is not possible, consider re-ordering supporting text to ensure the strongest policy test is set out first. • Require explicit consideration of cumulative air quality impacts, particularly where multiple developments, traffic growth or major infrastructure are present, to avoid incremental harm over time. • Ensure air quality assessments consider disproportionate impacts on vulnerable groups, including children, older people, people with long-term health conditions and communities living near busy roads. • Clarify treatment of sensitive receptors, explicitly identifying homes, schools, care settings and traveller sites as high-sensitivity uses requiring a higher level of protection.
Policy HW5: Hazardous Sites and Installations	No comments
Chapter 8: Employment	
Policy E1A: Land to the North of Mill Lane, Glenfield	No comments
Policy E2: Key Employment Sites and Other Existing Employment Sites	No comments

Policy E3: Employment Development on Unallocated Sites	Text could do more to encourage developers to deliver social value outcomes, including creation of local employment and skills opportunities. See - https://wmca.moderngov.co.uk/documents/s625/Appendix%204.pdf
Chapter 9: Retail, Leisure and Tourism	
Policy R1: Sequential Test and Impact Assessment	No comments
Policy R2: Blaby Town Centre, District and Local Centres	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. The HIA made particular recommendations to strengthen policy wording from a health perspective. Public Health welcome the inclusion of additional wording recognising design and value of urban greening and an attractive public realm.
Policy R3: Motorways Retail Area, Everards Meadows and Meridian Leisure	No comments
Policy R4: Neighbourhood Parades	No comments
Policy R5: Sustainable Tourism, Leisure and Visitor Development	Criterion F could helpfully cross-reference the Mineral Safeguarding Policy.
Chapter 10: Infrastructure and Transport	
Policy INF1: Developer Contributions	The supporting text to this policy reads: <i>“At this time the Council has not introduced a Community Infrastructure Levy and will continue to secure developer contributions through Section 106 agreements and, in the case of highways, Section 278 agreements to mitigate the impacts of development. Decisions will be taken in accordance with the legal tests set out in Regulation 122 (2) of the Community Infrastructure Levy Regulations 2010 (as amended) which states that a planning obligation must be</i> <i>• necessary to make the development acceptable in planning terms;</i> <i>• directly related to the development; and</i> <i>• fairly and reasonably related in scale and kind to the development.</i> <i>The Council will continue to keep under review the benefits of a Community Infrastructure Levy and where it decides to take forward CIL it will work with partners to deliver infrastructure such as schools or new strategic transport infrastructure to address the impacts of growth on existing communities.”</i>

	Given this, it is unclear how developer contributions towards transport interventions required to address the Plan spatial strategy's overall, cumulative impacts will be secured.
Policy INF2: Community Facilities	It is considered that the text could better promote inclusion of shared community meeting places/buildings where activities can take place and services can be delivered from.
Policy INF3: Burial Provision	It is queried whether paragraphs 10.25 – 10.31 under the heading 'Sustainable Transport' are incorrectly placed underneath Policy INF3: Burial Provision, and should instead form supporting text under Policy INF4.
Policy INF4: Sustainable Travel in New Developments	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. The HIA made particular recommendations to strengthen policy wording from a health perspective. Recommendations that have not been taken forward but Public Health would welcome the inclusion of are: • Make clearer reference that sustainable travel generally refers to non-motorised means of transport. Clarify if including electric vehicles as sustainable transport modes. Make clearer prioritisation of these methods of sustainable transport. Ensure all residents have equal access and choice of sustainable travel option. In particular, locate specialist housing and housing more likely to house vulnerable groups, such as bungalows accommodating older persons, closest to public transport hubs, bus stops and accessible routes on a site. • Refer in policy to appropriate storage and parking for sustainable travel options, including cycle parking and electric vehicle allocations. • Policy point 3 could be strengthened to add flexibility and openness to innovative transport approaches in rural areas. Understanding that opportunities in rural areas are restricted is important, however as worded could exclude innovative ideas and solutions to rural transport by developers and instead deliver only a consistent minimum requirement. • Strengthen policy through clearer prioritisation of sustainable travel would help articulate its positive role in improving affordability, ensuring equitable access, and health benefits. As per the comment in INF3, it is queried whether paragraphs 10.25 – 10.31 under the heading 'Sustainable Transport' are incorrectly placed underneath Policy INF3: Burial Provision, and should instead form supporting text under Policy INF4. It is considered that Paragraph 10.29 may be the 'transport strategy' that is referred to elsewhere in the Plan. But it is not clear and again not linked to demonstrating a response to current conditions on Blaby's transport system nor evidence of future conditions. The adopted Charnwood Local Plan 2021 to 2037 para's 9.17 to 9.29 and Policy INF2 provide an example of better clarity and relation to evidence. In paragraph 10.30, the wording reads "These measures taken together will enable higher levels of trip internalisation and modal shift than achieved in sites previously in Blaby District." However, it is considered that at present the Plan's evidence base does

	not provide any analysis of this bespoke to the place that is Blaby district. In the same paragraph, text reads “These expectations are a thread which runs through this plan.”, it is considered however that this is not clearly demonstrated.
Policy INF5: Active and Healthy Travel	Public Health completed Strategic Health Impact Assessments (HIA) for the draft Blaby Local Plan, submitted to colleagues March 2026. The HIA made particular recommendations to strengthen policy wording from a health perspective. Recommendations that have not been taken forward but Public Health would welcome the inclusion of are: • Clarify expectations around sustainable locations, confirming that development is delivered in locations that are, or will be made, accessible and sustainable in practice both internally and externally of the site. • Strengthen reference to inclusive supporting infrastructure along active travel routes, including provision or access to permanent, well-managed seating/rest areas, shade and toilets. • Encourage early delivery of active travel routes, so walking, wheeling and cycling infrastructure is in place and usable from the earliest stages of development. • Improve alignment with national guidance by referencing the Active Travel England planning toolkit and recognising the role of Active Travel England as a statutory consultee on qualifying developments. • Reinforce support for healthy school travel, encouraging safe, direct and well-designed walking, wheeling and cycling routes that promote independent travel, physical activity and reduced car use for children and young people.
Policy INF6: Public Transport	Policy INF6 should be ‘Passenger Transport’, which is a wider and more embracing term than ‘Public Transport’.
Policy INF7: Highway Arrangements on Cross Boundary Sites	Regarding the policy text. “1) Where sites are cross boundary, or require cooperation between Blaby District Council and another adjoining Council to either deliver a site allocation in this Plan or a site allocation in an adopted adjoining Plan the Council will work collaboratively with neighbouring Local Planning Authorities and developers to ensure sites can come forward in a timely way.” This is welcomed in principle, but should also relate to the cross-boundary delivery of infrastructure and services required to enable site delivery.
Policy INF8: Parking and Highway Design Standards	No comments
Policy INF9: Lorry Parking Facilities	No comments
Policy INF10: A47 High Load Route	No comments

Policy INF11: Waste Management, Collection and Recycling	Policy is welcomed. Reference to circular economy could be referenced in policy text as well as the supporting text.
Chapter 11: Implementation and Monitoring	No comments

Further Comments (Appendices)	3. <u>Monitoring Framework</u> ENV5 • Amend (Bullet point 4): Number of non-designated heritage assets recorded on the Historic Environment Record – No target. Monitor. • Add (Bullet point 5): Proportion of a planning applications determined with archaeological/heritage conditions secured – No target. Monitor. 4. <u>Glossary of Terms</u> <i>Designated heritage assets</i> should either reflect the full definition as detailed in the NPPF Annex 2 (World Heritage Sites, Scheduled Monuments, Listed Buildings, Conservation Areas, Registered Parks and Gardens, Registered Battlefields), or the criteria indicated in the Culture and Heritage Chapter (SM, LB, CA). <i>Non-designated Heritage Assets</i> are other buildings, monuments, sites, places, areas or landscapes not meeting designation criteria but have been identified as having a degree of heritage significance by Blaby District Council. NDHA are identified through the development management process, the preparation of Neighbourhood Plans or Local Heritage Listing. The most up to date and complete record of non-designated heritage assets is maintain by the Leicestershire and Rutland Historic Environment Record.
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