

**Leicestershire County Council Officer Response to
Blaby District Council's New Local Plan Issues and Options Consultation**

Scale of Growth and Locational Strategy

Question 1: What start and end dates do you think are the most appropriate for the new Local Plan?

LCC response

Preference is for 2011 as the start date, as this corresponds with the start date of the Strategic Growth Plan and the evidence which underpins it. For the end date 2037 as suggested, or further forward in time, 2041 or 2046; so the long term view can be clearly expressed and embedded in the Local Plan, and it provides greater potential for ease of alignment with other Local Plans in the HMA and related implementation of proposals and monitoring.

Scale of Growth and Locational Strategy

Question 2: Do you agree with the issues identified? Are there any other issues that should be considered?

- a) Issue 1: The population of the District, and wider housing market area, is continuing to grow and new households require housing as a result;
- b) Issue 2: A suitable amount of additional employment land will need to be provided to ensure that it supports the local economy and future housing growth; and
- c) Issue 3: The plan must identify sustainable locations for housing, employment and other new development.

LCC response

Agree with the three issues identified and suggest addition of the following issues:

- The recently declared 'Climate Change Emergency' (at national and local level) requires thought and consideration being given to the priorities and challenges this provides in relation to delivering future growth through Blaby DC's new Local Plan.
- The existing spatial distribution of development across L&L is unable to support future growth and a different spatial distribution is required moving forward. This will entail the identification of strategic growth locations in Blaby, either as part of existing communities or involve the creation of new communities within the framework provided by the SGP. It is important to note that one of the key drivers for the SGP was the understanding that in the longer term in L&L the existing settlement pattern would be unable to support future growth, and a new spatial distribution which seeks to deliver essential infrastructure is required.

Housing Growth Options

Question 3: Which of the following option(s) do you think should be pursued? Are there any other options to consider?

Option A: Continue with existing level of housing growth beyond 2029.

This method would see the continuation of providing 380 homes per year as set out within the existing Local Plan.

Option B: Use the standard methodology for calculating local housing need.

The National Planning Policy Framework expects local planning authorities to use the national standard method to identify the minimum number of homes expected to be planned for (with other methods only being acceptable in exceptional circumstances). This approach would plan to deliver a minimum requirement of 339 homes per year.

Option C: Use the standard methodology and provide for a share of the unmet need (towards the end of the Plan period).

This would reflect the approach set out in the Leicester and Leicestershire Strategic Growth Plan. It would plan to deliver a minimum of Blaby District Council's own needs per year to 2031 and then deliver an increased housing requirement per year post 2031, to accommodate an agreed share of Leicester City's unmet needs.

(Further work is required to confirm the exact level of unmet need and for the local authorities to agree through a Statement of Common Ground, how that can be accommodated elsewhere).

LCC response

It is considered that Option C using the standard methodology (introduced by the NPPF) and seeking to provide for a share of the unmet need, towards the end of the new Local Plan period, should be pursued.

As part of this option, consideration needs to be given to the needs of the environment regarding housing growth (for example, sensitive areas should be avoided, and green infrastructure and habitats should be improved to be resilient to the impacts of land use changes).

Employment Growth Options

Question 4: Which of the following option(s) do you think should be pursued? Are there any other options to consider?

Option A: Plan for the employment requirements specified within the 2017 Leicester and Leicestershire Housing and Economic Development Needs Assessment (HEDNA).

The 2017 HEDNA identifies a requirement of around 4 hectares of additional employment land per year for Blaby District between 2011 and 2031. This requirement is based on previous trends and forecasts of future employment growth. It also reflects the requirements contained within the current Local Plan.

Option B: Work with neighbouring authorities to meet the different types of employment requirements across a wider area (and update the joint evidence base where required).

The HEDNA acknowledges that policy decisions may in reality influence the future spatial distribution of employment growth and land provision between authorities (within the Functional Economic Market Area). Cross boundary working may allow redistribution of identified requirements based on other factors such as availability of suitable sites or wider Local Authority ambitions to promote certain types of employment growth. Any such agreement would be subject to the Duty to Cooperate process to ensure that an open and clear audit trail can be evidenced.

Option C: Support employment growth above identified needs.

This approach would provide employment land above identified needs to increase Blaby District's competitive advantage.

LCC response

It is considered that Option B is the preferred option. Given the nature of the delivery of employment land and that policy decisions may influence the future spatial distribution of employment growth and land provision between local authorities, it is important for local authority partners to work together updating the joint evidence base and agreement through the Duty to Co-operate process. This could result in provision of employment growth above identified needs (Option C).

Locational Strategy Options

Question 5: Which of the following option(s) do you think should be pursued? Are there any other options to consider?

Option A: Continue with existing policy approach for the locational strategy.

The existing policy approach of 'urban concentration' directs most development to the Leicester Principal Urban Area (the PUA). A settlement hierarchy is used to determine the level of growth for other areas.

Option B: Extended Leicester PUA focus.

This option builds on Option A by proposing to extend the Principal Urban Area of Leicester. Whilst the extent is not defined this could potentially include Enderby, Narborough and Blaby, based on their levels of service provision.

Option C: Spread the distribution of growth.

This option gives a wider spread to the distribution of growth across the District. There are different ways to do this:

- *Trend distribution – based on where growth has taken place recently;*
- *Proportionate share – based on current size of settlements and/or a settlement hierarchy; or*
- *Equal share to each settlement irrespective of size.*

Option D: Infrastructure led development at strategic sites / garden villages.

This option is consistent with the Strategic Growth Plan and Blaby District Growth Plan. The SGP directs development to major strategic locations to reduce the impact of development on existing towns, villages and rural areas. In so doing, it allows new development to be focused in association with significant new and improved infrastructure, such as the proposed A46 expressway and A5 corridor.

It also allows for development in Leicester, other identified key centres and to a lesser degree, development of non-strategic scale sites elsewhere.

The SGP is a long term plan to 2050 and some of the major infrastructure proposed is not expected to happen until after the end of the Plan period. However, for this long term plan to be delivered effectively the foundations for this approach will need to be put in place through the Local Plan.

Option E: Single New Standalone Settlement

A single new settlement to accommodate the majority of the housing requirement. It is likely that development of this new settlement will extend beyond the plan period.

LCC response

With regards to locational strategy options, Option D should be pursued. This provides the potential to deliver key essential infrastructure, and best reflects the SGP strategy. Strategic masterplanning to provide a framework greater in scale than the preparation of a masterplan for a major site will be required. Strategic masterplanning should enable the scale and location of strategic sites and how they function as extended or new communities to be fully considered. Within the A46 Priority Growth Corridor in the district of Blaby it is highly likely that there will be a strong functional relationship with Leicester, including the City Centre, emphasising

the importance of radial and orbital routes and high quality public transport provision.

Careful consideration would be needed as to those elements of the SGP infrastructure that could reasonably be expected to be delivered during the local plan period and how this would align with/facilitate specific growth opportunities/locations. Identifying early infrastructure priorities for delivery during the plan period could open up currently inaccessible locations for strategic development both during the Local Plan period and beyond.

The scale and location(s) of specific development proposals under this option will be crucial to how they function as settlements and associated travel patterns. Strategic development in the A46 Priority Growth Corridor (including possible 'garden villages') is likely to have a strong relationship with the Leicester PUA and by extension is likely to have a reliance on this (to a greater or lesser degree) for access to jobs, services etc.

Correspondingly, developments in the priority growth corridor would need to be strategically planned with this in mind; i.e. as distinct new communities but supported by appropriate sustainable travel opportunities, including high-quality public transport links to the PUA, to minimise the need to travel by car. Phasing of supporting transport (and other key) infrastructure and services will be crucial to ensure these are introduced in a timely fashion, such that new communities can develop and function effectively during the interim build-out phase.

Furthermore, the cumulative impact of multiple development proposals spread across an area can be problematic for the highway network, particularly when seeking to secure appropriate mitigation through the Development Management process. The move towards more strategic sites and a reduction in the number of small and medium sites which is sought in the implementation of the SGP should help this situation to a great extent.

Strategic Green Designation Options

Question 6: Which of the below option(s) do you think should be pursued? Are there any other options to consider?

Option A: Continue with existing approach to retain the designations.

This option would retain the Green Wedge, Area of Separation and Countryside designations in principle. The detailed boundaries would be reviewed to take account of the new Local Plan site allocations and any other factual updates.

Option B: Consider whether or not to retain the designations.

This option would review whether or not to retain the Green Wedge, Area of Separation and Countryside designations in principle. If the designations are retained, the detailed boundaries would be reviewed to take account of the new Local Plan site allocations and any other factual updates.

LCC response

It is considered that Option A should be pursued. Policy designations for strategic green infrastructure should have longevity wherever possible, strengthening the value and principle of designation. Green wedge designation has been an effective policy tool, helping to provide 'green lungs' and physical identity and distinctiveness for communities. Within this context it is recognised that detailed boundary reviews will need to be undertaken to inform new Local Plan site allocations.

The review of detailed boundaries should take account of the proposed SGP transport infrastructure and any other strategic transport infrastructure required to support the plan, to avoid any fundamental contradictions which could impede delivery of essential infrastructure and thus undermine the plan.

In developing the emerging Local Plan such a policy needs to plan positively to enhance their beneficial use by considering their potential to provide access, sporting opportunities, landscape betterment and improved biodiversity in addition to the designation of additional areas of separation in locations adjoining new strategic locations. Initiatives/activities that seek to address CO2 emissions across administrative boundaries are also supported.

Health and Well-being

Question 7: Do you agree with the issues identified? Are there any other issues that should be considered?

- a) Issue 4: The District has some of the highest sports participation rates in the County. However, it ranks poorly in terms of both the quality and quantity of facilities;
- b) Issue 5: The residents of Blaby District are heavily reliant on private cars to travel to work and leisure. Walk and ride connections between key work, leisure and residential sites could be improved;
- c) Issue 6: Obesity is an increasing problem nationally and excess weight in adults within Blaby District is significantly worse than the England average; and
- d) Issue 7: Pockets of the District suffer from poor air quality, predominantly from vehicle emissions.

LCC response

Agree with the issues identified. It is considered that Issue 5 should also consider opportunities to increase co-location of homes and jobs to enable journeys to be more conducive to active modes of transport. Building on the Access Fund and links to the Transforming Cities Fund initiatives should help to resolve these issues.

Also note the ongoing developments in the Fosse Park/M1 J21 area, which are likely to further enhance its status as a major retail, leisure and employment destination within the District. The area as a whole remains very 'car oriented' and conversely unappealing for walking and cycling. Tackling this issue could help to increase uptake of active modes of travel and unlock further economic potential for the area.

Also note the issues do not consider the poor quality of green spaces and their benefit to both health/wellbeing and the environment (biodiversity, walking and cycling for example).

Open Space, Sport and Recreation Policy Options

Question 8: Which of the following option(s) do you think should be pursued? Are there any other options to consider?

Option A: Continue with the existing approach and update the evidence base.

Currently the Local Plan sets out (in Policy CS15) provision standards per 1000 population for each type of open space. This is a well established approach and would be supported by updated Open Space Assessment evidence. It would also continue to protect open space, sports and recreation facilities from other forms of development (subject to consideration of their use and quality).

Future needs would also be derived from the latest Playing Pitch Strategy (or equivalent) for sports related facilities.

Option B: Do not set out specific standards and instead require provision to be delivered in line with the Council's most up-to-date evidence.

Instead of setting out development standards per 1000 population within policy, provision of new open space, sport and recreation could be required to be in line with the Council's most up-to-date evidence. This approach would help to future proof the policy throughout the life span of the Local Plan (given that Sport England recommend that open space and playing pitch evidence is updated every 3 years).

Option C: Set out additional development criteria for new provision.

To support either Option A or B outlined above, criteria could be developed which sets out design-related requirements. These could include, for example, requirements for new provision to be accessible by sustainable modes of travel, where feasible create links to other areas of green infrastructure or to be well located within a new development to help maximise its potential usage.

LCC Response

It is considered Option B should be pursued supported by Option C. Option B takes into account Blaby District Council's most up-to-date evidence to reflect current conditions. Option C could support option B and would be beneficial to the environment (in terms of sustainable modes of travel, green wedges, National Habitat Networks, the Net Gain approach and the benefit on healthy communities). Furthermore, option C could offer an opportunity to ensure that design is also considered regarding biodiversity opportunities and maximising the potential usage for people.

Consideration could be given to a policy which directs new open space, sport and recreation policy provision towards locations with maximum accessibility via sustainable modes of travel.

If going down this route it would make sense to emphasise walking and cycling connections, given these modes have complementary public health benefits and are less susceptible to future changes to the commercial and/or public funding environments.

The approach adopted should take account of the overall needs of the community and wider locality and be geared to securing a comprehensive solution and not one just in relation to the individual site. Each development can then contribute towards the open space needs of the overall community either by on-site provision or financial contribution. This is a further justification for allocation of strategic development areas capable of delivering the infrastructure required to meet the needs of the new community.

Healthy Communities Policy Options

Question 9: Which of the following option(s) do you think should be pursued? Are there any other options to consider?

Option A: Continue with the existing approach.

This would continue the use of the existing Local Plan policies to cover issues such as provision of open space and encouragement of sustainable modes of travel. These policies would have health related benefits; however they may not be clearly referenced within the Local Plan.

Option B: Consider setting out a specific policy which relates to healthy communities.

A dedicated policy could be used to set out requirements which specifically aim to improve the health of the District's residents. This could include for example: a requirement for new residential proposals (over a certain number of dwellings) to submit a Health Impact Assessment; a requirement for all major new employment, retail and community facilities proposals to provide a suitable level of covered and secure cycle parking; or place restrictions on the number of hot food takeaways permitted within individual neighbourhood parades and /or within certain distances to schools.

Option C: Consider the use of a specific policy which looks to improve walking and cycling connections.
The use of such a policy could promote routes both within new development sites and through into other areas. This would help to improve / tackle a wide range of current issues regarding the health and well being of the District's residents (for example improved air quality, increased activity levels and providing better access to green space).

LCC Response

Prefer Option B as a specific policy requirement to submit a Health Impact Assessment means that health considerations are explicitly considered at an early stage and can positively influence the development proposal prior to securing planning permission.

Supportive in principle of a policy which helps to secure new and improved walking and cycling connections as part of new developments, providing it can cite particular (specific) ideas and initiatives. Any new infrastructure and routes would need to be cohesive extensions to the network in order to be a worthwhile investment (including by developers), which may not lend itself to a generic, 'one size fits all' type policy applicable to all developments irrespective of size or location.

It would be useful to understand how any policy might build on the Access Fund and link across to any relevant Transforming Cities initiatives to take advantage of any specific opportunities arising from these avenues.

Moreover, any new policy would need to be consistent with Leicestershire County Council's new Highway Design Guide (LHDG).

The approach adopted should take account of the overall needs of the community and wider locality and be geared to securing a comprehensive solution and not one just in relation to the individual site. Each development can then contribute towards the needs of the overall community either by on-site provision or financial contribution. This is a further justification for allocation of strategic development areas capable of delivering the infrastructure required to meet the needs of the new community.

Housing Need

Question 10: Do you agree with the issues identified? Are there any other issues that should be considered?

- a) Issue 8: There is a lack of affordable housing to meet local needs, partly due to house prices increasing faster than incomes;
- b) Issue 9: Different sectors of the community have different housing needs in terms of type and size;
- c) Issue 10: There is an increasing pressure within the District to provide suitable accommodation

for older people (including dementia friendly, lifelong homes and bungalows); and

d) Issue 11: There is a need to further understand the requirements for Gypsy and Traveller and Travelling Show People who meet the definition for planning purposes.

LCC Response

Yes, agree with issues identified. Para. 61 of the NPPF provides guidance as to those areas of housing need that should be considered in determining the overall housing mix including the need for affordable housing. Accordingly, all the issues outlined should be considered in developing a coherent housing policy.

Design should incorporate good quality green environments to help improve people's well-being. Green space should be varied in habitat types and within close proximity to developments. Examples could be gardens and useful community spaces.

Affordable Housing Policy Options

Question 11: Which of the below option(s) do you think should be pursued? Are there any other options to consider?

Option A: Continue with the existing approach.

Continue to seek 25% affordable housing on all sites across the District of 15 dwellings or more; and enable the provision of rural exception sites.

Option B: Modify the policy approach in terms of the threshold for and percentage of affordable housing.

The current threshold is 15 dwellings or more. A lower threshold would mean that more sites would be eligible to provide affordable housing. The current percentage is 25%. A higher percentage proportion could increase the amount of affordable housing provided (subject to viability).

Option C: Allocate sites specifically for affordable housing.

Allocate sites for affordable housing and for rural exceptions sites. This would require a willing landowner to provide a site at a suitable cost but currently there is funding available from Homes England.

Option D: Provide higher levels of housing overall.

A higher level of housing overall would generate more affordable housing at 25%.

LCC Response

It is considered that Option B should be pursued as it would enable more market housing sites to contribute towards the affordable housing provision. Though with the move towards more delivery through strategic sites in future Local Plans a higher percentage proportion would also be desirable. Advise against reliance on Option C which could result in allocated sites for affordable housing simply not coming forward for development if funding isn't available.

Housing Mix Policy Options

Question 12: Which of the below option(s) do you think should be pursued? Are there any other options to consider?

Option A: Continue with existing policy approach.

The existing policy is flexible in that it takes account of the most recent evidence to demonstrate need in terms of housing type, tenure and size.

Option B: Use a prescriptive policy approach.

Set out within the policy the requirements for specific types and sizes of housing. For example for people who rent their homes and self and custom build plots.

Option C: Allow the market to determine the mix of type and size of housing.

Allowing the market to determine the mix of type and size of housing.

LCC Response

Support for Option A which entails using the most recent evidence to demonstrate need in terms of housing type, tenure and size as this best fits the housing needs of the local communities.

Housing for an ageing population and specialist needs Policy Options

Question 13: Which of the below option(s) do you think should be pursued? Are there any other options to consider?

Option A: Maintain the current policy approach.

Taking into account current and future demographic changes the existing policy approach is considered to be the minimum action necessary.

Option B: Develop a higher policy requirement for the provision of accessible and adaptable homes.

Population trends, both nationally and locally, clearly show that populations are aging. Local policy needs to reflect these trends and plan for them proactively. Higher requirements could be considered to coincide with a more forward looking plan period. Making homes accessible and adaptable for changing and unforeseen circumstances provides families and individuals with the choice of staying in their existing home.

Option C: Include policy requirements for other house types which are suitable for older people and others with specialist needs.

Subject to suitable evidence of local need, additional policy requirements could be set out to meet the range of needs for older people and others. This could include bungalows, extra care, registered care and convalescent care and specialist housing for older people as well as people with dementia or mental health difficulties. All additional requirements would be subject to viability testing to ensure that they do not prevent additional development coming forward.

Option D: Consider allocating sites specifically for older persons and other specialist housing.

Subject to suitable evidence of local need sites of varying development scales could be allocated to meet specific needs including sites for older persons homes, specialist needs, extra care and registered care.

LCC Response

Support seeking to progress options B, C and D, as it is recognised that housing for an ageing population and specialist needs requires stronger policy requirements and specific allocations than incorporated in the current Local Plan.

Whatever policy approach is taken, the locations of such provision will need to be carefully considered in terms of accessibility to key services; bearing in mind specialist needs, mobility issues etc.

Planning for Travellers Policy Options

Question 14: Which of the below option(s) do you think should be pursued? Are there any other options to consider?

Option A: Continue with existing policy approach.

The current approach allows the most recent evidence to be used to demonstrate need. It includes broad locations and criteria to set out the approach to determine planning applications. New evidence is required to clarify the number of 'unknown' households in the District and to justify a Leicester and Leicestershire-wide approach to the provision of public transit pitches.

Option B: Allocating sites.

Currently there is sufficient provision but if this is no longer the case, we will need to consider identifying sites to allocate.

LCC Response

It is considered that the existing policy approach to allocate sites should there no longer be sufficient provision, should be continued.

Environment and Sustainability

Question 15: Do you agree with the issues identified? Are there any other issues that should be considered?

LCC Response

Agree with key issues identified and suggest a further issue is how the Local Planning Authority can ensure the required biodiversity net-gain is met, and for the option of biodiversity off-setting to be investigated to facilitate this.

Note that in issue 16, the natural landscapes should be considered outside the District boundary (regarding landscape assessments both locally and in relation to those produced by Natural England) as landscape character is not defined by boundaries.

Design Policy Options

Question 16: Which of the below option(s) do you think should be pursued? Are there any other options to consider?

Option A: Continue with the existing approach.

The existing Local Plan promotes the delivery of good design through various policies. The most notable of which being Core Strategy Policy CS2 and Delivery DPD Policies DM1 and DM2. The submission of a masterplan is also a requirement for the site specific policies which allocate land for residential and employment allocations.

Option B: Consider setting out a more detailed approach to design policy.

Going beyond the current Local Plan approach, additional design requirements could be set out for specific policy areas (for example sustainable design) or additional design criteria could be developed for large scale proposals (for example of proposals for 100 dwellings or more).

Option C: Consider the use of a design specific Supplementary Planning Document (SPD).

To support either Option A or B outlined above, an SPD could be used to provide additional design guidance for a wide range of design related issues or focus on specific topics such as residential amenity.

An SPD could also be used to set out more detailed design related guidance for large scale development proposals (for example setting out how community facilities and/or open space should be best incorporated

into a development).

LCC Response

‘Raising the bar’ with regards to design is a key aspiration of the SGP; SPD in design could effectively help to secure higher quality design as could other tools such as the use of design codes on strategic sites, As such Option C is preferred.

Details should be in line with the Leicestershire Highway Design Guide and national highway guidance and in all cases early master planning Involving LCC and the LHA should take place.

Historic Environment Policy Options

Question 17: Which of the below option(s) do you think should be pursued? Are there any other options to consider?

Option A: Continue with the existing approach.

Delivery DPD Policy DM12 Designated and Non-designated Heritage Assets aims to offer a level of protection to heritage assets proportionate to the asset’s level of importance. This builds on Core Strategy Policy CS20 Historic Environment and Culture’s overarching positive approach to the conservation of heritage assets and the wider historic environment.

Delivery DPD Policy DM12 was refined as part of the examination process of the DPD in 2018; and was subsequently adopted in February 2019. The current policy approach is therefore considered to reflect current national policy and guidance.

Option B: Consider setting out a more detailed approach.

Additional information could be gathered to see whether any specific areas or individual assets are worthy of protection for heritage reasons. Subject to evidence an additional heritage policy could be developed which builds on the existing District wide policy.

LCC Response

Option A could continue to be pursued, whilst option B is developed. A more detailed approach would facilitate and enhance effective delivery of the existing approach. It is worth bearing in mind that when SPD’s are being designed for open space, consideration should be given to habitats of existing historic landscape ensuring that design reflects this.

Natural Environment Policy Options

Question 18: Which of the below option(s) do you think should be pursued? Are there any other options to consider?

Option A: Continue with the existing policy approach.

The existing Local Plan contains a range of policies which cover various aspects of the natural environment. These are considered if and when development proposals on greenfield sites come forward.

Option B: Consider mapping all components of local wildlife-rich and wider ecological networks.

The existing policy approach could be strengthened by mapping all designated sites of importance for biodiversity and wildlife corridors that connect them. This would help to identify potential opportunities to create new linkages between existing assets.

LCC Response

It is considered that Option B should be pursued as key natural assets and the wildlife corridors between them need to be understood in the wider strategic masterplanning of new strategic sites so opportunities to enhance, such as through the creation of new links can be incorporated

within the masterplan.

Option B would help the LPA to deliver the required biodiversity net-gain from the planning process. It would involve an off-setting policy and process, but this is the only feasible to ensure net-gain from development. It is not always possible to achieve within the site boundary, except on larger sites, and therefore a strategic approach whereby biodiversity enhancements can be provided off-site, within the green network, is needed.

The first step is to map the green network and identify the potential and opportunities for biodiversity enhancements, and to identify the gaps and barriers to wildlife dispersal in the context of climate change.

A further comment on the text preceding this question – brownfield land can be (and often is) extremely rich in biodiversity assets; in many cases this is far higher than greenfield land within our intensively farmed agricultural landscape. Many of our best wildlife sites are formerly developed; I would cite the existing and former granite quarries in Blaby as an example.

As long as it is informed by appropriate ecology survey and design to avoid harm to existing biodiversity assets, and the off-setting policy outlined above is applied, development on intensively farmed greenfield land will bring about biodiversity enhancement – e.g. through habitat creation, landscape planting sustainable drainage and the cessation of agricultural chemical use. On brownfield land, this is usually much harder to achieve, as loss of habitat may be unavoidable.

Also important to note that the mapping of Ecological Networks supports the evidence base for the Local Enterprise Partnership and the Local Industrial Strategy.

Climate Change Policy Options

Question 19: Which of the below option(s) do you think should be pursued? Are there any other options to consider?

Option A: Update current policy to enhance sustainable design principles and the efficient use of natural resources.

This will ensure that any changes to national policy and guidance and local and regional evidence etc. can be taken into account and reflected within policy.

Option B: Consider setting a requirement for sites (of a certain size) to provide a percentage of their energy requirements through onsite renewable / low carbon energy generation sources.

Decentralised energy supply systems (such as combined heat and power) could help to reduce the ongoing carbon footprint of strategic sites.

Option C: Consider the use of a Supplementary Planning Document to provide more detailed guidance for sustainable development/design.

This would help to support the Local Plan's overarching sustainability objectives by providing applicants with information on sustainable design and what the Council expects to be delivered.

LCC Response

All options should be pursued as it is recognised that exploring decentralised energy supply systems, such as combined heat and power, for strategic sites could help to reduce their ongoing carbon footprints. Together with SPD providing more guidance for sustainable development and design, would provide a strong policy steer as to what action should be taken at the local level.

This is strengthened further by the County Council's recent sign up to the Climate Change Emergency.

Options A, B and C should all be considered. The current policy should be updated to reflect current national policy and guidance (option A). Option B would ensure renewable/low carbon energy generation is utilised where there is an expectation of higher usage (on larger sites). Option C would greatly aid planners setting out clear guidance. SPD's ideally should be developed in partnership with Leicestershire County Council.

Leicestershire County Council has declared a climate emergency as have over half of UK councils. The County Council has committed to becoming carbon neutral as a council by 2030 and to working with others to keep global temperature rise to less than 1.5 degrees C. This will require the county to be carbon neutral by 2050 if not before. Planning is one of the key levers for enabling these commitments to be met and to meeting the legally binding target set by the government for the UK to be carbon neutral by 2050.

To have any chance of achieving carbon neutrality by 2050 or before all/most new buildings need to be carbon neutral / positive and there needs to be a programme of retrofitting to improve the efficiency of existing buildings. In addition, there will be a need to significantly increase efforts to protect and enhance biodiversity to support the need to provide carbon sequestration, to provide resilience from extreme weather events and to reduce the worst economic and social impacts of the significant decline in biodiversity within the UK (Leicestershire has the second lowest level of biodiversity in the UK).

So, action needs to go beyond consideration and at a minimum all the above 3 options need to be undertaken as part of an urgent step change in updating planning policies and plans so that they actively support and reinforce action to achieve carbon neutrality and the protection and enhancement of biodiversity. This could be done in stages i.e. moving from option A to B to C, but this would need to be done over a short timespan due to the urgency for action. There is general consensus (IPPC Report 2018) that we need to make significant progress in reducing global carbon emissions by 2030 – 10 years to save the planet.

In general the language, tone and emphasis within the Issues and Options Consultation document does not reflect the urgent need for action and the critical and important role that the local planning system needs to play in avoiding the worst impacts of climate change, protecting people and property from harm and reducing the impact on the local economy, society and communities.

The updated policy should incorporate/include specific reference to provision for electric vehicles in line with the latest national policy and guidance around this.

The LHA would support a policy that builds electric vehicle charging infrastructure etc. into new properties where this does not impede the safe and effective functioning of the highway.

Economy, retail and leisure

Question 20: Do you agree with the issues identified? Are there any other issues that should be considered?

LCC Response

Agree with issues identified and recognise there is an additional issue to be added The issue arising all over the country is the growth in on-line sales which has resulted in a decrease in the need for physical stores on the High Street and has resulted in an oversupply of retail units. There

is a case to be made that there are too many retail units and conversion back to residential or other uses should be encouraged rather than leaving vacant units that affect the vitality and viability of existing retail centres.

If it is proposed to encourage any new development in the areas adjacent to PUA ie Narborough, Blaby and Enderby, all of which have their own existing village/retail centres, then there is a need to create routes from any new housing developments, through to these centres for walking and cycling, as car parking is limited in all three centres and if residents experience difficulty in parking then they will go elsewhere such as Fosse Park where traffic conditions are already challenging.

Whilst Blaby District is accessible for the strategic road network, there are pockets of the District, including areas likely to form a future focus for new employment, that remain relatively inaccessible due to lack of access points and/or local network constraints. These challenges will need to be overcome to open up such areas for development.

Whilst the District benefits from established rail connections to key wider economic/retail centres (including Birmingham and Leicester), the frequency and general quality of these services is relatively low with aspirations to see this improved.

Sustainable transport accessibility will be an important consideration for strategic employment developments, with an emphasis on public transport for potential sites outside of established urban areas (e.g. HNRFI) and/or which draw employees from a wide catchment area. In relation to this, the emphasis should be on site promoters and end users to put forward solutions that meet their business needs.

Employment Mix Options

Question 21: Which of the below option(s) do you think should be pursued? Are there any other options to consider?

Option A: Continue with the existing policy approach.

Delivery DPD Policy SA5 identifies a wide range of key employment sites within the District to be protected for employment uses. The policy also sets out requirements to be met before they can be considered for changes of use to non-employment uses.

Option B: Consider a policy which distinguishes between different types of employment sites (including strategic-scale B8 uses).

Taking a more hierarchical approach, to providing and protecting employment land would, allow for a greater level of appreciation of the varying functions and roles of different types of employment. This would help to identify the specific needs of certain types of employment (for example strategic-scale B8 uses).

Option C: Update evidence base and allocate a range of employment sites to meet (local and regional) demands.

Subject to the findings of updated evidence, employment allocations could be considered for specific types of employment. This approach would accord with the growing national emphasis on more detailed planning for the logistics sector and their bespoke requirements. It will also recognise the need for smaller scale employment sites to meet local scale needs.

LCC Response

Option C should be pursued as it would provide a clearer policy steer for the delivery of different types of employment uses and best aligns with the aspirations of the SGP. Co-location with housing is sought to provide the opportunity to live close to work and to be able to walk or cycle.

A policy which distinguishes between categories of employment sites would reflect the fact that different types of economic activities have differing needs and impacts in transport terms and may help to direct development to the most suitable locations (e.g. sites located as close as possible to the strategic road network are likely to be appropriate for strategic logistics but potentially less so for other forms such as office developments).

Retail options

Question 22: Which of the below option(s) do you think should be pursued? Are there any other options to consider?

Option A: Continue with the existing policy approach and update the Council's evidence base where necessary.

The existing approach is well established but requires an updated Retail Study to fully support it. Updating the evidence will also allow an opportunity for recent changes to national policy and guidance and retail trends to be considered.

Option B: Consider amending the existing policy approach to allow for a greater level of flexibility of uses within Blaby Town Centre and Neighbourhood Parades.

The current policy approach includes a series of tests to be met before changes of use to non-retail will be considered. Consideration could be given to relaxing or even removing these requirements.

LCC Response

Updating the retail study and Option B with a view to 'relaxing' rather than removing requirements is preferred. Primary frontages should be retained for retail use; however, more flexibility to bring vacant secondary frontages back into use would be supported. This would help to bring more vitality and viability into the town centre by virtue of vacant units being removed, more presence of people and greater surveillance helping to increase a sense of well-being and safety.

An updated retail study is necessary. The function of town centres is changing from one dominated by retail uses, to service centres and spaces that people come to experience tourism, events, eat and drink and socialise. So advise an update to the retail study and allow greater flexibility of uses. Consideration should also be given to the policy steer for Fosse Park beyond the current improvements and expansion, particularly given the impact on the highway network and J21 of the M1.

Leisure and Tourism Options

Question 23: Which of the below option(s) do you think should be pursued? Are there any other options to consider?

Option A: Continue with the existing policy approach.

The existing approach is well established and focuses development proposals to most sustainable locations within the District.

Option B: Consider the use of a specific tourism related policy

This could expand on the current policy approach by promoting certain forms of tourism related development and / or promote certain areas of the District for tourism.

LCC Response

It is considered that Option B should be pursued. Green infrastructure sites and waterways support the visitor economy and should therefore be recognised within the plan.

The new leisure facilities at Everards Meadows brings new opportunities for integrating built

leisure facilities and connecting to outdoor leisure pursuits, our natural assets and greater connectivity by sustainable forms of transport. This new leisure concept is likely to form a new tourism attraction when it opens and will hopefully pave the way for further innovative leisure attractions.

Tourism should be encouraged, especially in Town Centres to increase their chances of being sustainable.

The LHA would be supportive of a policy which seeks to focus new leisure and tourism developments in locations which are accessible via walking, cycling and public transport.

Transport

Question 24: Do you agree with the issues identified? Are there any other issues that should be considered?

- a) Issue 19: Some two-thirds of the working population of the District travel to work using a car or van. This is substantially above the national and County average;
- b) Issue 20: There are five Air Quality Management Areas within the District which have mainly been designated as a result of vehicle emissions;
- c) Issue 21: Over-reliance on car use will continue in new developments unless they are located in areas that have a wider choice of transport options to access a wide range of services and facilities; and
- d) Issue 22: Some junctions and road links within the District are operating at or above capacity, with limited scope for further improvements.
- e) Issue 23: The Birmingham to Peterborough railway line runs through the District via Narborough Station. The benefits of this connection should be maximised.

LCC Response

Agree with issues identified. There are several additional issues to consider:

- Access to the strategic road network (SRN; especially the M1) is limited to a couple of junctions shared with the wider Leicester urban area, exacerbating pressure on these junctions and meaning there is limited network resilience to any incidents at or near these locations.
- A large proportion of traffic using the SRN within the district (i.e. M1 J21-21a and A46 western bypass) is for shorter local journeys, which pushes these routes close to or over capacity at peak-times and conflicts with longer distance traffic.
- Orbital connectivity in and around the urban area of the district is arguably as important as radial connectivity into Leicester city centre and yet provision is limited (by all modes) and constrained by key bottlenecks within and without the district (e.g. around the M1 J21 area).
- In relation to issue 22 and the preceding points, congestion hotspots can encourage traffic to 'rat run' along less suitable rural routes through the district, particularly along (alternative) 'orbital routes' around the periphery of the Leicester urban area.
- It is important that we make maximise usage of the district's existing commercial bus

network and Park and Ride services wherever possible, to support their future viability and growth.

- In relating to the preceding point, existing public transport in the district is primarily centred on radial connectivity into Leicester City Centre and does not necessarily reflect the travel-to-work and/or shift patterns of key employers within Blaby District, limiting scope for modal shift.
- Additionally, public transport in the rural part of the district is more limited and vulnerable to future evolution of the commercial market and public funding landscape.
- In relation to issue 23, the CrossCountry rail franchise is due to be renewed in the near future. This could result in changes, which could in turn present opportunities to secure significant improvements in provision for the Leicestershire/Blaby District sections of the Birmingham – Leicester – Peterborough line.
- The Local Plan will need to cross-reference Leicester City Council's 'Transforming Cities' initiatives and proposals to address air quality problems within the city; setting out how the Plan might build on these initiatives and take advantage of any specific opportunities arising as a consequence.
- There will need for a 'step change' in accessibility (by all modes) in certain parts of the district to accommodate the longer-term SGP aspirations, especially within the A46 priority growth corridor. Given the likely scale and timescales of the required infrastructure, the first steps towards this will need to be taken through the next plan period (i.e. up to 2037 or whatever alternative date is agreed). In some cases it may also be necessary and appropriate for key longer-term elements (i.e. beyond 2037) to be 'built-in' or futureproofed as part of the Local Plan.

Transport Policy Options

Question 25: Which of the below option(s) do you think should be pursued? Are there any other options to consider?

Option A: Continue with existing policy approach.

This would maintain the policy approach of seeking to 'encourage' more sustainable transport modes whilst acknowledging that private cars have an important role in transporting people. Where adverse impacts are identified at junctions and links, mitigation solutions will be required by the policy.

Option B: Promote policies that actively encourage sustainable transport.

To help shift the emphasis towards more sustainable transport modes consideration could be given to policies which promote for example: the provision of new and improved park and ride facilities, seeking greater financial contributions towards public transport or improving cycling / walking infrastructure in preference to road and junction upgrades.

Option C: Promote policies that actively discourage use of private cars.

Options such as: traffic calming measures for all new developments, facilitating the infrastructure for congestion charging / workplace car park charges, and applying maximum car parking provision in new commercial developments, could be considered to help reduce private car use.

Option D. Promote improved technology and traffic management to address congestion, delays and air quality.

This assumes that technology, including improved traffic management and use of responsive satellite navigation systems, will be able to accommodate the anticipated levels of traffic on certain routes.

Option E. Allow for development and accept that junctions and links will continue to operate above

capacity.

This may result in 'self-regulating' behaviour where people choose alternatives where routes and junctions become too congested. This approach would place lesser transport constraints on growth but is likely to perpetuate traffic problems on the network.

LCC Response

A combination of transport policy options A to E is likely to be required and should be informed to a degree by transport evidence undertaken for the New Local Plan and by Leicester City Council's Transforming Cities initiatives, and proposals to tackle air quality problems within the City particularly work place parking.

Local Services and Infrastructure**Question 26: Do you agree with the issues identified? Are there any other issues that should be considered?**

- a) Issue 24: There are capacity constraints within some services and facilities, such as health facilities and schools. New development to accommodate increases in the population will necessitate increases in capacity for these services and facilities;
- b) Issue 25: Infrastructure needs to be provided in a timely and viable manner and have certainty of delivery and ongoing management; and
- c) Issue 26: New development needs to have access to all necessary utilities including water, power, and telecommunications (including broadband); and going forward, electric vehicle charging points

LCC Response

Agree with issues identified. It is important to note the SGP identifies essential infrastructure that will need to be brought forward in a timely manner to support future growth. Some of the essential infrastructure will need to be identified in the new Local Plan and longer term beyond the end date of the new Local Plan. The new Local Plan will need to be mindful of the longer term requirements for infrastructure so that essential infrastructure still to be built out is able to do so.

Capacity restraints are not just limited to health facilities and schools. New development will have an impact on other types of infrastructure such as green infrastructure and the wider waste transfer network, including Household Waste Recycling Sites. Local energy creation could support the diversification of habitats such as those associated with biomass-this relates to the possibility of encouraging a change in land management that could fuel more biofuel and biomass plants. For example; the development of coppiced woodlands for charcoal and the use of managed grasslands to provide feed sources to fuel biomass plants in-conjunction with food waste.

Infrastructure Policy Options**Question 27: Which of the below option(s) do you think should be pursued? Are there any other options to consider?*****Option A: Continue with existing policy approach***

This approach seeks on-site provision and financial contributions to a wide range of infrastructure where new development requires the provision. It ensures that developments support a wide range of services and facilities (including health, education, policing, libraries and other forms of social infrastructure).

Option B: Prioritise infrastructure based on viability

This would help to prioritise scarce financial resources towards key infrastructure to be agreed as the Local Plan progresses. This could prioritise certain types of infrastructure.

Option C: Only allow development where there is demonstrable capacity or certainty of delivery of infrastructure such as schools / health services etc.

This approach would result in an infrastructure-led approach where development sites are chosen on the basis of existing or potential supply of infrastructure.

LCC Response

Through the plan-making process support for key strategic infrastructure needs to be considered and embedded. The SGP provides a clear overarching framework within which the detail needs to evolve and be tested. Consultation will be a key part of this process as will be the Local Plan examination. Through being plan led issues of viability and deliverability will need to be considered in the wider context of the whole Local Plan; and in reality, a combination of option A, B and C is likely to be appropriate.

Through the plan-making process, the LHA would seek to identify and agree a package of supporting transport mitigation that is realistic and deliverable within the plan period. This would naturally need to take account of wider infrastructure considerations and viability.

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