

## LOCAL PLAN REVIEW

### DEVELOPMENT STRATEGY OPTIONS AND POLICY OPTIONS - JANUARY TO MARCH 2022

#### SUMMARY OF RESPONSES TO Q1

#### Q1 – DO YOU AGREE WITH THESE LOCAL PLAN REVIEW OBJECTIVES? IF NOT, WHY NOT?

Comments on specific objectives are as follows.

#### Objective 1 - Enable the health and wellbeing of the district's population.

Comments	NWL officer response
Objective 1 should be more aspirational and deal with health inequalities. (LCC)	The wording is considered to reflect the realistic role and influence that the Local Plan will have on health and wellbeing. No change proposed.

#### Objective 2 - Ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of size, tenure and type.

Comments	NWL officer response
<p>Amendment the objective to reflect the need for the L&amp;L authorities to assist Leicester City in meeting its unmet needs in full as follows; "Ensure the needs of the Housing Market Area can be met in full through the delivery of additional housing, above local demographic needs, to meet unmet needs from Leicester City."</p> <p>Another respondent proposes the following; "Ensuring the delivery of new homes, including affordable housing, which meets local housing needs in terms of <b>quantum</b>, size, tenure and type; <b>whilst also making an appropriate contribution towards the unmet housing needs that are arising from Leicester City Council</b>"</p> <p>Remove the word 'local' from Objective 2.</p> <p>Objective 2 could refer to meeting neighbouring needs, as North West Leicestershire will be required to address some unmet need from Leicester City. It could also address the nationwide need to significantly boost the supply of housing.</p>	<p>Compared with when the objectives were drafted, there is now more certainty about the scale of Leicester City's unmet need and the council's contribution towards meeting that need, if agreed. An adjustment is considered to be justified;</p> <p>Objective 2 - Ensure the delivery of new homes, including affordable housing, which meet <u>local</u> housing needs including in terms of <u>number</u>, size, tenure and type.</p> <p>The NPPF objective to boost housing supply is achieved through the use of the Government's standard method to calculate local housing need. Reference to boosting housing supply in the objective is not considered critical in this case.</p>
Expand Objective 2 to include that the delivery of new homes must also meet local needs with sufficient choice in a variety of locations and settlements	This is considered to be a matter for the plan's spatial strategy, rather than an objective in itself. No change proposed.

(including a significant proportion to Sustainable Villages).	
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**Objective 3 - Achieve high quality development which is sustainable, which responds positively to local character and which creates safe places to live, work and travel.**

<b>Comments</b>	<b>NWL officer response</b>
Objective 3 could address the sustainability of new housing in terms of locating developments next to existing services and facilities, which would benefit both the community and the sustained provision of local amenities.	This is considered to be a matter for the plan's spatial strategy, rather than an objective in itself and, in any event, is broadly covered in Objective 4. No change proposed.

**Objective 4 - Reduce the need to travel and increase opportunities for cycling, walking and public transport use, including connecting homes, workplaces and facilities and through the delivery of dedicated new infrastructure.**

<b>Comments</b>	<b>NWL officer response</b>
The role of Green Infrastructure could be mentioned within this objective, especially considering the GI Study for the district which is currently underway. This would encompass opportunities to create green links, enhance PRow and public access to nature and the countryside (Natural England)	The aim is to keep the objectives succinct where possible. The suggested amendments refer to the qualities of good sustainable links and are considered too detailed for inclusion. Also, access to green space is covered in Objective 11. No change proposed.
Objective 4 should also recognise the need to protect and maintain services and facilities within settlements to ensure continued levels of sustainability	It is considered that this is adequately covered in Objective 11. No change proposed.
Amend with the addition of the text in []; "Reduce the need to travel [by private car] and increase opportunities for cycling, walking and public transport use, including connecting homes, workplaces and facilities and through the delivery of dedicated new infrastructure,[including multifunctional green infrastructure corridors].	Reducing private car use is the nub of the issue and it is recommended that this change be made. Adding specific reference to multifunctional greenspace is considered to be too detailed for an objective. Amend Objective 4 to read "Reduce the need to travel <u>by private car</u> and increase opportunities for cycling, walking and public transport use, including connecting homes, workplaces and facilities and through the delivery of dedicated new infrastructure."

**Objective 5 - Support the district's economy, including its rural economy, by providing for a range of employment opportunities which respond to the needs of businesses and local workers.**

<b>Comments</b>	<b>NWL officer response</b>
Objective 5 should be more positively framed; the Local Plan should "meet",	On reflection, this objective could be more specific about making adequate provision of

rather than “respond to”, the needs of businesses and local workers.	employment land. ‘Sufficient provision’ is the term the NPPF uses. Amend Objective 5 to read “Support the district’s economy, including its rural economy, by providing for a range of employment opportunities <u>and sufficient new sites</u> which respond to the needs of businesses and local workers.”
Objective 5 should also recognise the importance of a joined-up strategy in balancing the delivery of housing and job creation to assist in achieving sustainable travel patterns.	This is considered to be a matter for the plan’s spatial strategy, rather than an objective in itself and, in any event, is broadly covered in Objective 4. No change proposed.
Amend objective 5 to read “the rural economy, <b>as well as the services and facilities available in rural areas</b> ”.	This is sufficiently covered by Objective 11. No change proposed.

**Objective 6 - Enhance the vitality and viability of the district’s town and local centres which have an important role serving our local communities with a particular focus on the regeneration of Coalville.**

<b>Comments</b>	<b>NWL officer response</b>
Objective 6 should specify areas which will be supported, including new housing within and close to town centres.	This particular objective is more concerned with services and facilities and commercial activity in town and local centres. Delivering housing in/close to these centres would contribute to Objectives 2 and 4. No change proposed.
Objective 6 places too much emphasis on and therefore resources being allocated to Coalville. This should not be to the disadvantage of other settlements and Ashby de la Zouch in particular which has had very substantial residential growth, but without the necessary improvements to infrastructure and services.	Supporting Coalville is an objective in the Council’s latest Delivery Plan and it is right to reflect this in the Local Plan Review objectives. No change proposed.
The vitality and viability of the district’s lower level settlements, including the identified Sustainable Villages, should also be recognised.	Supporting services generally is covered in Objective 11. No change proposed.

**Objective 7 - Ensure new development mitigates for and adapts to climate change, including reducing vulnerability to flooding, and contributes to reduced net greenhouse gas emissions to support the district becoming carbon neutral by 2050.**

<b>Comments</b>	<b>NWL officer response</b>
Suggest that the importance of nature-based solutions could be referenced within the objective. (Natural England)	There are likely to be a broad range of relevant measures so specific reference to nature-based solutions is not considered appropriate. No change proposed.

Objective 7 should have a target date of 2045 (LCC)	2050 is the target in the Zero Carbon Roadmap and Action Plan. No change proposed.
Add specific references to the need to incorporate SuDS and water efficiency into objectives 7, 9 or 10 (Severn Trent)	This is considered to be too specific and detailed for inclusion in the objectives. No change proposed.
Objective 7 could address new housing, employment and services being located in sustainable locations to reduce the need to travel. This would support the objective of reducing carbon emissions and adapting to climate change through changed behaviours.	This is considered to be a matter for the plan's spatial strategy, rather than an objective in itself and, in any event, is broadly covered in Objective 4. No change proposed.

**Objective 8 - Conserve and enhance the district's built, cultural, industrial and rural heritage and heritage assets.**

Comments	NWL officer response
Include reference to setting in order that NPPF requirements for the historic environment can be addressed; "Conserve or enhance the district's built, cultural, industrial and rural heritage and heritage assets <u>and their setting.</u> " (Historic England)	Agreed. Impact on setting is a planning consideration (NPPF paragraph 200 and elsewhere). Amend objective 8 to read "Conserve or enhance the district's built, cultural, industrial and rural heritage and heritage assets <u>and their setting.</u> "
Should include mention of Conservation Areas.	'Heritage assets' include Conservation Areas. No change proposed.

**Objective 9 - Conserve and enhance the district's natural environment, including its biodiversity, geodiversity, water environments and landscape character, notably the National Forest and Charnwood Forest as well as its other valued landscapes.**

Comments	NWL officer response
We advise that inclusion of wording regarding enhancing habitat connectivity and/or contributing to the wider Nature Recovery Network, a key part of the government's 25-year environment plan, would be beneficial here. We also suggest that another notable area which could be mentioned is the River Mease SAC, due to its European designation. (Natural England)	The work on Nature Recovery Networks is considered to be broadly encompassed in the wording of the objective. The River Mease SAC is a significant designation and its inclusion within the objective appears appropriate. Amend Objective 9 to read "Conserve and enhance the district's natural environment, including its biodiversity, geodiversity, water environments and landscape character, notably <u>the River Mease Special Area of Conservation,</u> the National Forest and Charnwood Forest as well as its other valued landscapes."
This should be more proactive and strategic in its approach to biodiversity and ecological networks which should be conserved, protected and enhanced.	In this context, 'protect' and 'conserve' convey similar things and the adding the former would not improve the objective's meaning. No change proposed.
Amend Objective 9 to read: " <i>Conserve and, enhance and extend the district's natural environment, including its biodiversity, geodiversity, water</i>	The NPPF uses the term 'biodiversity net gain' and incorporating this phrase into the Objective would address the point raised.

<p><i>environments and landscape character, notably the National Forest and Charnwood Forest as well as its other valued landscapes.</i>” In line with the NPPF and the emerging Environment Bill, the requirements of biodiversity net gain include the need to increase the amount of biodiversity as development is brought forward, rather than merely enhance the existing biodiversity. (Environment Agency)</p>	<p>Amend Objective 9 to read “Conserve and enhance the district’s natural environment, including its biodiversity, geodiversity, water environments and landscape character, notably the <u>River Mease Special Area of Conservation</u>, the National Forest and Charnwood Forest as well as its other valued landscapes. <u>Pursue opportunities for biodiversity net gains.</u>”</p>
<p>Amend with the addition of the text in []; “Conserve, [enhance, and improve access to] the district’s natural environment, including its biodiversity, geodiversity, water environments and landscape character, notably the National Forest and Charnwood Forest as well as its other valued landscapes”.</p>	<p>Access to green space is covered in Objective 11. No change proposed.</p>
<p>What is the definition of a valued landscape?</p>	<p>This is the term used in the NPPF. The Local Plan Review evidence base provides an analysis of the visual and landscape value of parts of the district. No change proposed.</p>

**Objective 10 - Ensure the efficient use of natural resources and brownfield land, control pollution and facilitate the sustainable use and management of minerals and waste.**

<b>Comments</b>	<b>NWL officer response</b>
<p>Brownfield land should be prioritized but is downgraded to ‘efficient use’ of in Objective 10.</p> <p>Amend Objective 10 to the efficient use of land generally rather than just previously developed land to be in line with the NPPF’s approach to this topic.</p> <p>Clarify that ALL land should be used efficiently, and that development of brownfield land should be prioritised.</p>	<p>The NPPF refers to ‘the effective use of land’ and also ‘using land efficiently’. In respect of brownfield land it talks about ‘promoting and supporting the development of under-utilised land and buildings’ and ‘making as much use as possible of such land’.</p> <p>Amend Objective 10 to “Ensure the efficient use of natural resources and <del>brownfield</del> land, <u>in particular brownfield land</u>, control pollution and facilitate the sustainable use and management of minerals and waste.”</p>
<p>Objective 10 should deal with minimising waste and resource efficiency (LCC)</p>	<p>Agreed. Minimising waste is one of the aspects planning’s environmental objective (NPPF paragraph 8c).</p> <p>Amend Objective 10 to read; “Ensure the efficient use of natural resources and [from above] <del>brownfield</del> land, <u>in particular brownfield land</u>, control pollution and facilitate the sustainable use and management of minerals and <u>the minimisation of waste.</u>”</p>

Objective 11 - Maintain access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks and health & social care and ensure that development is supported by the physical and social infrastructure the community needs and that this is brought forward in a co-ordinated and timely way.

<b>Comments</b>	<b>NWL officer response</b>
Objective 11 should include libraries (LCC).	Libraries are encompassed in 'cultural facilities'. No change proposed.

### Omissions

<b>Comments</b>	<b>NWL officer response</b>
Matters the objectives should cover are; a) the transition to the L&L Strategic Growth Plan; b) the infrastructure needed to support growth; c) stronger re climate change; d) tourism; e) Freeport/EMA expansion; f) best start in life (LCC)	a) a review of the Strategic Growth Plan fed into the drafting of the objectives in the first place. The Growth Plan and its significance will be referenced in relevant sections of the plan itself. b) this is covered in Objective 11 c) Objective 7 covers this matter clearly and at an appropriate level d) this is encompassed in Objective 5 e) this is a location-specific proposal to be addressed in the relevant sections of the plan f) this is covered generically under Objectives 1 and 11. No changes proposed.
No objective for 'efficient use' of greenfield land or density requirements which should be remedied in the submitted plan.	See the proposed amendment to Objective 10 above. Density is a detailed matter for the plan.
There should be an overarching objective to reach Net-Zero Emissions which should include an assessment of location.	This is covered in Objective 7.
It is appropriate to define the period of time for delivery because currently only the district target of carbon neutrality by 2050 states a period of time and this is beyond the proposed period for the local plan.	The plan period (to 2039) will be set out elsewhere in the plan.
Objectives to be strengthened to give stronger protection for the countryside, local green space and valued landscapes. Include measures to protect character of settlements.	The Objectives are not policies in themselves. The matters listed will be considered as part of the plan itself.

### General comments

<b>Comments</b>	<b>NWL officer response</b>
Some of the objectives are contradictory, for example it is not possible to achieve objectives 2, 3, 4 and 5 if you are going to achieve objectives 8, 9, 10 and 11.	Noted. The objectives should not be applied as blanket requirements and successful planning means finding an appropriate balance between completing aims. The overarching objectives are useful as context

	for the detailed matters in the plan which follow.
Objectives should be specific and measurable. They are too vague.	The objectives are intended to be overarching in nature. A specific monitoring framework will be included in the final draft Plan to measure the Plan's implementation