

## RESPONSES TO PROPOSED POLICIES

Appendix A

<b>CHAPTER 4</b>	<b>PLAN OBJECTIVES</b>
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### A. GENERAL COMMENTS/SUPPORT

<b>MAIN ISSUES RAISED</b>	<b>COUNCIL RESPONSE</b>	<b>ACTION</b>	<b>RESPONDENTS ID</b>	<b>RESPONDENTS NAME</b>
Support for the Plan Objectives, in particular Objectives (1), (4) and (10).	Support welcomed		45	Leicester, Leicestershire & Rutland Integrated Care Board
Agree with the draft objectives	Support welcomed		208 214 226	Curzon Coaker Trust; Bloor Homes & Taylor Wimpey; Harworth Estates & Caesarea
Generally support the objective to ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of number, size, tenure and type.	Support welcomed		237	Home Builders Federation
We support the objectives but there is a lack of detail as to how the planning system will help deliver these objectives. While the planning system has a role in preventing bad development too frequently it is preventing good much needed development. Especially housing, causing the crisis due to lack of supply and rural development.	The objectives will be delivered primarily through the development of the sites identified in the draft plan and by the application of the policies in development management decisions. More broadly they will be achieved by joint working with public and private sector partners, in		422	CLA

	particular on the matter of infrastructure.			
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## B. SPECIFIC COMMENTS

<b>MAIN ISSUES RAISED</b> [specific comments]	<b>COUNCIL RESPONSE</b>	<b>ACTION</b>	<b>RESPONDENTS ID</b>	<b>RESPONDENTS NAME</b>
Add a 12 <sup>th</sup> Objective as follows: <i>“Take notice of the adverse impacts of over-development [cumulative] in any one area by more evenly spreading employment, housing needs and opportunities over the region to better distribute wealth and quality of life. [or words to that effect]. In any event, to apply a principle of proportionality for development to better align with population distribution densities”.</i>	The proposed wording suggests a new pattern of development (i.e. a more even spread) which is a matter for the plan’s overall spatial strategy rather than an objective in itself. In any event, some form of proportional approach would fail to recognise the key planning considerations such the availability of infrastructure and services, suitability of individual sites, highway impacts etc. Different patterns of development have been tested through the Sustainability Appraisal process including an option (Option 9) which dispersed new housing to more individual settlements than proposed in the draft Plan.	No change.	115 376	Protect Diseworth; Jim Snee
Objective 1 - Strengthen the wording to ‘support better health and wellbeing....’ or ‘enhance health and wellbeing.’	The current wording of Objective 1 (‘enable the health and wellbeing of the district’s population’) reflects the positive but limited influence the planning system has on health matters.	No change	341	Leicestershire County Council

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Objective 2 - this objective could be strengthened through a commitment to address the acute housing affordability issues within the district rather than a simple reference to delivery of affordable housing.	The Local Plan must balance the need for more affordable housing with the necessity for development to be viable and deliverable. The more stringent wording suggested could prove to be unachievable in viability terms.	No change	144 219 221 280	Clarendon Land Ltd; David Wilson Homes; Williams Homes; Richborough
Objective 2 - reference to meeting cross boundary needs is vital given the commitment in the Leicester and Leicestershire Statement of Common Ground to meeting some of Leicester's shortfall and contribute towards the delivery of the sub-regional Strategic Growth Plan	The council has agreed to the 686 dwellings/year requirement in the SoCG and this is clearly expressed in draft Policy S1. It does not need to be repeated in the Objectives.		188 232	Cadwallader Family; Caddick Lane
Objective 2 - the considerable need for built-to-rent needs to be considered and addressed by the new Local Plan	Noted. This is a specific matter to be considered in the context of draft Policy H4 – Housing Types and Mix, rather than the Objectives.		232	Caddick Land
Objective 2 - expand to include the delivery of new homes must also meet local needs with sufficient choice in a variety of locations and settlements.	This is linked to the plan's overall spatial strategy rather than being an objective in itself.		207	Metacre Ltd
Objective 4 - the role of Green Infrastructure should be mentioned, encompassing opportunities to create green links, enhance Public Rights of Way and public access to nature and the countryside.	Agreed.	Amend Objective 4 as follows: "Reduce the need to travel including by private car and increase opportunities for cycling, walking and public transport use,	223	Natural England

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		including connecting homes, workplaces and facilities <b>using green infrastructure where possible</b> and through the delivery of dedicated new infrastructure.”		
Objective 5 –Building on agricultural land restricts the ability to provide for the local population.	The NPPF requires us the ‘recognise the economic and other benefits of the best and most versatile agricultural land’ (paragraph 180) in the preparation of the Local Plan. Some greenfield, agricultural land will have to be developed if the required amount of new housing, employment, infrastructure and other uses is to be delivered.	No change.	289	Swannington Parish Council
Objective 5 - This objective should be strengthened to include protecting and supporting the development of the district’s economic assets, including EMA as a national and regionally significant employment and economic asset.	The plan Objectives are high level and set out key principles. They are not the spatial strategy and do not refer to individual sites, however significant a site or sites may be.	No change.	230	MAG Property
Objectives could reference the Government’s Freeports programme although this is an economic designation and it is important to keep planning consideration at the forefront.	Agreed that it is an economic rather than a planning designation.	No change.	233	MAG Property

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<p>The Objectives should include express support for, and emphasise the significant impact of, the East Midlands Freeport. It will encourage businesses to locate in the area to take advantage of the financial incentives whilst making best use of the nearby strategic road network and air and rail freight infrastructure. This status is of local, regional and national significance and it is therefore important that the economic growth strategy and plan objectives takes this into consideration.</p> <p>No objectives related to the expansion of East Midlands Airport and Freeport proposals.</p>	<p>The plan Objectives are high level and set out key principles. They are not the spatial strategy and do not refer to individual sites, however significant a site or sites may be. Also, as outlined above, it is an economic designation rather than a planning one.</p>	<p>No change.</p>	<p>290 341</p>	<p>SEGRO; Leicestershire County Council</p>
<p>Add the following key objectives from an economic growth perspective:</p> <ul style="list-style-type: none"> <li>• To support the retention of existing allocations for high quality employment land</li> <li>• To maximise the allocation of new land for employment uses (particularly use classes B1, B2, B8) to accommodate growing businesses</li> </ul>	<p>These are matters for the policies in the plan, not the overarching objectives.</p>	<p>No change</p>	<p>341</p>	<p>Leicestershire County Council</p>
<p>Objective 7 – the importance of nature-based solutions for climate change mitigation should be referenced.</p>	<p>The plan Objectives need to be high level and set out key principles. It is agreed that nature-based solutions will be part of the package of climate change mitigation measures however this</p>	<p>No change.</p>	<p>223</p>	<p>Natural England</p>

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	would be encompassed by the current wording.			
It is suggested that the objectives should be stronger in respect of the climate emergency and decarbonisation agenda.	Objective 7 deals with these matters and LCC does not suggest what specific alterations are needed. The current wording is considered appropriate.	No change.	341	Leicestershire County Council
Objective 7 - recognise the role which minerals sites play in combatting climate change and acknowledge the role of the district in helping wider schemes. This links to both the Climate Emergency and strategic green infrastructure ideas.	Minerals is covered in Objective 10 but the role of minerals sites is a more specific matter which is not central to this plan.	No change.	341	Leicestershire County Council
Objective 8 - this might usefully reference <i>historic</i> townscape and landscape character. Historic character is a recognition of the cumulative contribution that heritage assets (designated and non-designated) and the wider historic environment can provide. Historic character looks beyond individual heritage assets, bringing together an understanding of complementary landscape and townscape forms.	It is agreed that some reference to overall historic character, as well as different forms of heritage which contribute to it, could be valuable addition. Landscape character is addressed in Objective 9.	Amend Objective 8 as follows: "Conserve or enhance the district's <b>historic character, including its</b> built, cultural, industrial and rural heritage and heritage assets and their setting."	341	Leicestershire County Council
Objective 9 – add reference to; <ul style="list-style-type: none"> <li>• enhancing habitat connectivity and/or contributing to the wider Nature Recovery Network, a key part of the government's 25-year environment plan</li> </ul>	It is agreed that the concepts of habitat connectivity and green infrastructure as a form of natural resource are missing from Objective 9 as written. The current reference to the River Mease SAC is considered sufficient.	Amend Objective 9 to read "Conserve and enhance the district's natural environment, including its biodiversity <b>and habitat connectivity,</b>	223	Natural England

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<ul style="list-style-type: none"> <li>• River Mease SAC, due to its European designation</li> <li>• Green Infrastructure.</li> </ul>		geodiversity, <b>green infrastructure</b> , water environments and landscape character, notably the..."		
<p>Objective 9 - amend to read "Conserve and enhance <i>and extend</i> the district's natural environment...". This change is required to reflect the requirements of Biodiversity Net Gain (BNG).</p> <p>BNG is a mandatory requirement of the Environment Act 2021 with all qualifying development to provide a minimum 10% measurable BNG to be delivered as part of the development.</p>	The BNG requirements have come into force since the draft Local Plan consultation documents were prepared. A reference to BNG in Objective 9 is now merited.	Amend Objective 9 to read "Conserve and enhance the district's natural environment, including its biodiversity, geodiversity, water environments and landscape character, notably the River Mease Special Area of Conservation, the National Forest and Charnwood Forest as well as its other valued landscapes and <del>pursue opportunities for biodiversity net gains</del> <b>achieve Biodiversity Net Gain</b> "	404 232	Environment Agency; Caddick Land
Given that this Local Plan has a key part to play in the transition of Housing Market Area (HMA) wide housing spatial distribution from the former Regional Growth Plan emphasis to one now driven by the Leicester and Leicestershire Strategic Growth Plan, it is surprising that there is no Strategic Objective relating to	The Strategic Growth Plan and its relevance is explained elsewhere in the plan documents. The SGP is an important influence on the plan but is not an objective in itself.	No change.	341	Leicestershire County Council

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achieving this transition and what that entails.				
Objective 10 - mention the use of waste as a valuable resource and contributing to a circular economy. Amend as follows – ‘10. Ensure the efficient use of natural resources, in particular brownfield land, control pollution and facilitate the sustainable use and management of minerals and the <i>prevention and</i> minimisation of waste.’	The current wording reflects the positive but limited influence the Local Plan can and will have on waste matters.	No change	341	Leicestershire County Council
Objective 11 - the objective should also protect and enhance existing community infrastructure. The Local Plan has a major role to play in this respect as well as providing for new infrastructure through development.	Agreed.	Amend Objective 11 to read “Maintain <b><u>and where possible enhance</u></b> access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks and health & social care and....”	143	Sport England
Include a further objective related to ensuring the coordinated delivery of infrastructure across districts required to support growth, but most particularly in respect of the various significant growth proposals coming forward in the International Gateway area, including those part of the East Midlands Freeport, those being	Co-ordinating infrastructure delivery is specifically mentioned in Objective 11. A further objective about cross-boundary impacts is unnecessary.	No change.	341	Leicestershire County Council



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promoted by the DevCo and the proposal for a new settlement (Isley Woodhouse) E.g. "Ensure the coordinated delivery of infrastructure required to enable the delivery of new development, including to help to mitigate the cumulative impacts of growth (which may in some cases be cross-boundary)."				
The document has the potential to recognise and align more closely with broader regional or national strategic objectives, such as those related to economic recovery, technological advancement and the transition to a green economy. The objective could be to ensure that local development is cohesive and contributes to wider economic and social objectives.	The suggested wording is very general and, as it stands, would add little to the understanding or interpretation of the plan.	No change	341	Leicestershire County Council
A robust mechanism for implementing the proposed policies and monitoring their outcomes would be welcomed. Are there adequate resources, both financial and human, dedicated to bringing these policies to fruition? Clear metrics and benchmarks could be identified to assess progress towards the document's objectives, ensuring that it is possible to adapt to change.	A monitoring framework will be included in the next version of the Local Plan.		341	Leicestershire County Council