

CHAPTER: 5	POLICY NUMBER: AP2	POLICY NAME: Amenity		
MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENT ID	RESPONDENT NAME
<p>(1) New development should be designed to minimise its impact on the amenity and quiet enjoyment of both future residents and existing residents in the vicinity of the development. Development proposals will be supported where: (a) They do not have a significant adverse effect on the living conditions of existing residents through the loss of privacy, excessive overshadowing and overbearing impact. (b) They do not generate a level of activity, noise, vibration, pollution or unpleasant odour emission, which cannot be mitigated to an appropriate standard and so, would have an adverse impact on amenity and living conditions.</p>				
<p>[Part 1 would be far more robust if it specified when development would not be supported. The term “<i>significant adverse effect</i>” is too high a bar and is difficult to define. “Detrimental” is a better term and is used elsewhere in the document.]</p> <p>Part 1 should be rewritten as follows: <i>(1) ... Development proposals will not be supported where:</i> <i>(a) They are detrimental to the living conditions of existing residents through the loss of privacy, excessive overshadowing and overbearing impact, or</i> <i>(b) They do not generate a level of activity, noise, vibration, pollution or unpleasant odour emission...</i>”]</p>	<p>The suggested change to the wording is not ‘<i>positively prepared</i>’ (as required by the NPPF) and is unlikely to be accepted by the Local Plan Inspector. However, officers think the policy could be made more robust and less ambiguous by replacing ‘<i>supported</i>’ with ‘<i>permitted</i>’.</p> <p>Whilst the use of ‘<i>significant adverse effect</i>’ in (1)(a) was deemed appropriate for the adopted Local Plan, replacing it with ‘<i>unacceptable</i>’ is more in keeping with the terms in NPPF (2024) paragraphs 187 and 198. For consistency, ‘<i>unacceptable</i>’ should also be added to (1)(b).</p> <p>On reflection, it is also recommended that ‘<i>pollution</i>’ is</p>	<p>Change part 1) to read “Development proposals will be <u>permitted</u> where...”</p> <p>Change part 1(a) to read “They do not have <u>an unacceptable impact</u> on the living conditions...”</p> <p>Change part 1(b) to read: “They do not generate <u>an unacceptable level of activity, noise, vibration, light</u> or unpleasant odour emission which cannot be mitigated to an appropriate standard.”</p>	92	Ashby Town Council

APPENDIX A – POLICY AP2 (AMENITY)

	deleted from 1(b) and 'light' is added. Pollution (air, land and water quality) is dealt with in Policy En6 (plans should avoid unnecessary duplication).	Add supporting text to aid in the interpretation of 'unacceptable'.		
(2) Development which is sensitive to noise or unpleasant odour emissions will not be permitted where it would adversely affect future occupants.				
[It is unclear how a development can be “ <i>sensitive</i> ” to noise or unpleasant odour emissions. Is the policy intended to protect future occupants from an existing source of noise or odour or is it intended that sources of noise or odour are not built close to existing or potential new homes? If the former, then we would suggest substituting “ <i>subject</i> ” for “ <i>sensitive</i> ”. If the latter, then it needs more extensive rewriting]	It is agreed that this part of the policy could be clearer and reference to mitigation is required in line with the NPPF. The intention of (2) is to address the ‘agent of change’ principle at NPPF paragraph 200, meaning proposed development needs to account for the existing environment and provide suitable mitigation in order to be acceptable. The term significant adverse effect is taken from NPPF paragraph 200.	Rewrite part (2): “Development proposals which are likely to experience significant adverse effects from noise, vibration, light or odour levels in its vicinity will only be permitted where suitable mitigation can be provided that would reduce the effects to an appropriate level.”	92	Ashby Town Council
[Part 2 of the policy does not allow for appropriate mitigation in accordance with NPPF §191a and NPPF §180e. It 2 should be redrafted to include reference to mitigation, similar to Part 1 of the policy]	We have broadened the policy to include vibration and light impacts so it is consistent with (1)(b). We also propose changing ‘ <i>will not be</i> ’ to ‘ <i>will only be</i> ’ to make the wording more positive.		183	Turley (Clowes, Redrow, Wilson Estates)
The use of “it” in part (2) detracts from the clarity and understanding of this part of the policy. It might be better worded to read, “Development which is sensitive to noise or unpleasant odour emissions will not be permitted where	We suggest changing to ‘in its vicinity’; this wording is used in the NPPF and is sufficiently clear and concise.		225; 229;	Planning Prospects (St Modwen); Planning Prospects (P, W, C & R Redfern)

<p><u>the existing or expected presence of noise or odour</u> would adversely affect future occupants.”</p>				
<p>(2) Proposals for external lighting schemes should be designed to minimise potential pollution from glare or light spillage. The intensity of lighting should be necessary to achieve its purpose, and the benefits of the lighting scheme must be shown to outweigh any adverse effects</p>				
<p>[Please consider using lighting that matches natural patterns: blue light is dominant from dawn to midday, while red-orange light should be used at night. Blue LED light at night can negatively affect health and nature; LEDs now offer a range of colours to suit these needs.]</p>	<p>The Planning Practice Guidance says the following on this topic: <i>“White light, with more blue content or with ultraviolet content, is generally more disruptive to wildlife than, say, yellow/orange light. Similarly, for humans, light intrusion by white/blue light is more disruptive to sleep. Use of modern white light sources that filter out blue or ultraviolet light may mitigate these effects, as well as offering superior directional control. However, whiter light aids people’s vision and ability to perceive colour; it also facilitates CCTV use.”</i> The type/nature/suitability of lighting will vary for each development proposal. The Local Plan cannot account for every eventuality, so the wording of (3) is considered appropriate for how the decision maker should react to development proposals in general terms.</p>	<p>No change to the policy.</p> <p>Add some more supporting text on lighting at Regulation 19 stage.</p>	<p>396</p>	<p>Siobhan Dillon</p>

APPENDIX A – POLICY AP2 (AMENITY)

General comments				
[General Support]	Noted	No change	45; 175; 185; 186; 188; 214; 232;	LLR Integrated Care Board; Oakthorpe, Donisthorpe & Acresford Parish Council; Pegasus Group (Clowes Developments); Pegasus Group (Wilson Bowden Developments); C. Green Planning (Cadwallader Family); Stantec UK (Bloor Homes Midlands and Taylor Wimpey Strategic Land); Stantec UK (Caddick Land);
Any future policy should support the demonstration and provision of mitigation measures where necessary and appropriate to address any potential amenity impacts	Noted, changes are proposed to part (2) of the policy (see above).	See proposed amendment to part (2) above.	211; 235;	Pegasus Group (Davidsons); Pegasus Group (Davidsons & Westernrange)

APPENDIX A – POLICY AP2 (AMENITY)

Any developments should not have an adverse impact on the lives of those already in the parishes. There are sadly examples where past and proposed developments have violated that principle and Ashby Woulds Town Council is keen that the principle must be upheld going forward.	Development cannot avoid <i>all</i> adverse impacts. The key issue for decision making is the scale of the adverse impact, whether mitigation is required and if so, whether mitigation can reduce the adverse impact to an acceptable level. The policy is drafted to guide decision makers on how to respond to these issues.	No change As proposed above, add supporting text at Regulation 19 stage to aid in the interpretation of what constitutes an ‘unacceptable’ impact.	180	Ashby Woulds Town Council
[The policy should recommend that developments are well connected by sustainable transport as appropriate].	This issue is dealt with in Policy IF5; plans should avoid unnecessary duplication.	No change	341	Leicestershire County Council (planning)
[Can vibrancy of place and connectivity be considered in this section? It might be helpful to include reference to the TCPA guidance ‘20 Minute neighbourhoods: creating healthier, active, prosperous communities’, as it recommends planning principles for healthy neighbourhoods—such as streets, space access to community facilities and vibrancy of amenities—to enable new development to be integrated into the existing businesses as per 5.9]	Officers consider these matters are better dealt with in the design policy / design guide.	No change	341	Leicestershire County Council (planning)
Minerals and waste safeguarding are important considerations on this issue. Extant minerals and waste operations and infrastructure should also not be prejudiced by non-waste and non-mineral development in proximity.	Noted; this issue would be covered by the redrafted part (2) (see above).	See Part (2) above.	341	Leicestershire County Council (planning)

APPENDIX A – POLICY AP2 (AMENITY)

The policy is seen as forming an integral part of overall design policy and should be incorporated within a broader Policy AP1	Officers have no concerns with AP2 being a distinct policy.	No change	341	Leicestershire County Council (landowner)
Nowhere does it say that all policies must be read in conjunction with each other for example AP2 on noise should apply to all policies.	Applications for planning permission must be determined in accordance with the development plan (as a whole), unless material considerations indicate otherwise. This will be made clearer when the Local Plan has been drafted as a single document (the Regulation 19 Plan) rather than three separate consultation documents.	No change	527	Julia Howard
Investment from the companies developing land around and in Kegworth would be welcome. Playgrounds, sports facilities, pedestrian crossings and a larger school would all help.	Comments are noted, but this is not the purpose of Policy AP2. The Infrastructure Delivery Plan will identify the infrastructure required from proposed development sites.	No change	585	J Lewis
Application of the policy to specific sites				
[Maintaining nighttime goods flights is vital for UK business growth. East Midlands Airport supports exports, international trade, local jobs, and economic development. We oppose housing plans at Isley Woodhouse and ask that a balanced approach is applied; weighing the need for housing against the economic importance of the airport. Appropriate mitigation for	Noted; part (2) has been amended to better reflect the agent of change principle	See Part (2) above.	218	UPS

APPENDIX A – POLICY AP2 (AMENITY)

businesses and residents is required. If the development proceeds, the Agent of Change principle must be applied.]				
[The NPPF states that new developments should avoid locations where they may be affected by existing issues like noise. The proposed site at Isley Walton (Woodhouse) could be affected by activity at East Midlands Airport, potentially compromising the growth of an existing important national and regional asset/the nationally significant night-time air cargo operation.]	Noted; part (2) has been amended to better reflect the agent of change principle	See Part (2) above.	230	East Midlands Airport
[Proximity to the airport and racetrack means new developments may expose residents to unacceptable noise and light levels, as highlighted in sections 5.8, 5.9, and 5.48(F), potentially harming residential amenity and public safety.]			350	Teresa Walker
If you consider the impact of the Freeport on the small village of Diseworth. The specifics in 5.8 of the documentation, 'noise, light and the quality of life of...existing residents' it's not clear how this will apply.	These impacts would need to be dealt with in detail as part of a planning application. If the impacts cannot be adequately mitigated, then an application would be contrary to Policy AP2 and could be refused on that basis.	No change	651	Amanda Hack

APPENDIX A – POLICY AP3 (RENEWABLE ENERGY)

CHAPTER: 5	POLICY NUMBER: AP3	POLICY NAME: RENEWABLE ENERGY
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MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
(1) The Council will support renewable energy proposals that contribute towards achieving the following renewable energy generation targets by 2040: (a) 50.62 MW of energy generated by solar energy generation. (b) 47.8 MW of energy generated by wind generation.				
<p>The policy should be aligned with NPPF paras 160-163. The target for renewable energy generation should be regarded as a minimum level of delivery over the plan period notwithstanding the need to upgrade strategic infrastructure and grid connections. As it's a strategic policy, the local plan should define those areas where the generation of renewable energy is acceptable in planning terms and not rely on delivery through Neighbourhood Plans (other than for the identification of additional local opportunities) nor should local opinion determine or constrain the ability to deliver otherwise acceptable renewable energy developments.</p>	<p>Noted. The draft Policy supports the delivery of renewable energy and sets targets for both solar energy generation and wind energy generation for plan period. The plan period now goes to 2042 and as such the targets will need amending.</p> <p>The Policies Map identifies areas potentially suitable for small and medium/large scale wind energy generation.</p>	<p>Part (1) of the policy be amended to read:</p> <p>The Council will support renewable energy proposals that contribute towards achieving the following renewable energy generation targets by 2042:</p> <p>550.762 MW of energy generated by solar energy generation.</p> <p>52.647.8 MW of energy generated by wind generation.</p>	341	Leicestershire County Council
(2) Proposals for renewable energy generation as part of new housing developments should be proportionate to the scale of the proposed development and appropriate to their setting.				
<p>Query the use of the term "proportionate" in para 2 of the</p>	<p>Noted. However, the current wording is considered</p>	<p>No change.</p>	92	Ashby de la Zouch Town Council

APPENDIX A – POLICY AP3 (RENEWABLE ENERGY)

proposed policy. A development with a larger renewable energy generation capacity than is needed for that development alone could be considered disproportionate despite its obvious beneficial contribution to renewable energy generation. Maybe this could be overcome by substituting “ at least sufficient for ” instead of “ proportionate to ”.	appropriate. The provision of more than enough energy from renewable sources on a development would need to be managed on a site-by-site basis by the developer.			
The Renewable and Local Carbon Energy Study (2021) identifies the main opportunities for NWLDC going forward will be wind and solar energy and heat pumps but this should include the need to review sites on a site-by-site basis, having regard to viability, feasibility and local context. Part (2) of the Draft Policy should have regard to the need to review sites on a site-by-site basis to consider viability, feasibility and local context.	Part (2) of the policy refers to renewable energy generation as part of new developments being proportionate. In terms of viability, this policy is one to be tested through the forthcoming whole plan viability assessment which will inform the Regulation 19 version of the plan.	No change.	214	Stantec UK Ltd obo Bloor Homes Midlands and Taylor Wimpey Strategic Land
We support the Council’s approach to the delivery of renewable energy through Draft Policy AP3. It is important to ensure that the delivery of renewable energy projects is proportionate to developments, particularly when these are proposed as part of new housing developments.	Noted. The requirement set out in Part (2) of the draft policy should apply to all developments and not just housing. As such the word housing needs to be deleted from the requirement.	Delete the word housing from Part (2) of the draft policy. The revised wording to read: (3) Proposals for renewable energy generation as part of new housing	226	Oxalis Planning and Pegasus Group East Midlands obo Harworth Estates and Caesarea

APPENDIX A – POLICY AP3 (RENEWABLE ENERGY)

		developments should be proportionate to the scale of the proposed development and appropriate to their setting.		
(3)(a) There is no unacceptable impact on residential amenity as result of the development alone or in conjunction with any permitted and existing renewable energy schemes in terms of noise, shadow flicker, vibration, topple distance, glint and glare and visual dominance				
Policy Cc1 of the Adopted Local Plan refers to the cumulative effect that would result from other existing renewable energy schemes and the impact on economic, social and environmental benefits for the communities closest to the proposal. This should be included in Draft Policy Ap3.	In terms of the cumulative effect that would result from renewable energy schemes, this requirement is included in Part (3)(a) of the draft policy albeit the criterion is worded differently. Part (3)(a) refers to there being no unacceptable impact of the development alone <u>or</u> in conjunction with any permitted and existing renewable energy schemes. The adopted Local Plan (Policy Cc1) refers to the economic, social and environmental benefits for the communities closest to the proposal. The adopted Local Plan was drafted in the context of the National Planning Policy Framework (2012) which made specific reference (para. 93) to the economic, social and	No change.	527	Julia Howard

APPENDIX A – POLICY AP3 (RENEWABLE ENERGY)

	environmental dimensions of sustainable development in the context of planning playing a key role in providing resilience to the impacts of climate change and supporting the delivery of renewable and low carbon energy. The wording in the NPPF has since changed but as the elements of sustainable development are set out in national policy, it is not necessary for them to be repeated in Local Plan Policy.			
(3)(b) There is no unacceptable impact on the landscape character taking account of the special qualities set out within the individual National Character Areas				
Part 3(b) refers to the need to ensure there is no unacceptable impact on landscape character with reference to National Character Areas. This should be extended to incorporate the need to ensure there is no unacceptable harm to the significance of heritage assets or their setting or include this as a separate criterion.	Noted. When assessing proposals, the Local Plan will be considered as a whole, and it is considered that draft Policy En7 (Conservation and Enhancement of the Historic Environment) sufficiently sets out the requirements in relation to heritage assets and their setting.	As a result of changes to part (3)(b) of the policy (set out below) draft criteria (3)(b) will become (3)(c) – there are no proposed changes to the wording of this criterion.	357	Historic England
Welcome bullet point (b) regarding the protection of landscape character but consider there should be an additional point stating that there should be no unacceptable impact on biodiversity, wildlife or nature conservation designations. The policy should	Noted. Planning Practice Guidance does suggest there is evidence of risk of collision between moving wind turbine blades and birds and/or bats. Whilst these are generally a relatively low risk, in some	Revise criteria (b) to read: (b) There is no unacceptable impact on biodiversity, ecology or wildlife. the landscape character	223, 404	Natural England, The Environment Agency

APPENDIX A – POLICY AP3 (RENEWABLE ENERGY)

ensure that appropriate measures are in place to protect the local environment. Para 5.19 of the supporting text recognises that the provision and benefit of medium and large-scale renewable energy schemes needs to be balanced against the environmental impacts. However, this requirement is not included within the Draft Policy. Strongly recommend that an additional bullet point, (d) is added under section (3) to include this requirement.	situations, such as in close proximity to important habitats used by birds or bats, the risk is greater and the impacts on birds and bats should therefore be assessed. As such it is considered appropriate to include additional policy wording to there is no unacceptable impact on wildlife, biodiversity or ecology.	taking account of the special qualities set out within the individual National Character Areas;		
(4) In addition to the above considerations, proposals for wind energy developments will be supported where: (b) It can be demonstrated that the proposal has support from the local community;				
Adopted LP Policy Cc1 part 2 (b) requires support from the local community for one or more wind turbines, <u>or</u> it is set out within an area defined as being suitable for wind energy development within an adopted Neighbourhood Plan (NP). The draft policy has the need for support of the local community as a separate item in the list of requirements. Currently, if a site is identified as suitable for a wind turbine in a NP, then it is automatically deemed to have the support of the Local Community, whereas the draft policy requires a site to have the proven support of the local community even if it has been included as a	The draft policy requirements were written in the context of the September 2023 NPPF. The NPPF was revised in December 2023 and again in December 2024. As such national guidance has changed. It is proposed that the policy wording be retained but that additional detail is added to the supporting text to set out that if a site is identified as being suitable for wind energy generation in a NP then it is deemed to have the support of the local community.	No change to the policy wording but propose that the supporting text is amended.	92	Ashby de la Zouch Town Council

APPENDIX A – POLICY AP3 (RENEWABLE ENERGY)

suitable site in a NP. NPs go to referendum before they are accepted and so have the support of the community.				
ADDITIONAL CRITERIA PROPOSED				
It might be appropriate add a criterion to cover accessibility to a site for construction (including for 'abnormal loads' as necessary) and future maintenance and replacement/upgrading ('re-powering') purposes, especially in respect of sites for wind turbines. Where existing/life-expired renewable energy infrastructure (mainly that of wind turbines) is proposed to be replaced by new generation/more powerful infrastructure, which may be of a significantly larger scale, there should not be an automatic assumption that this will be acceptable in transport-terms, at least in terms of transportation to/from the site.	It would be for the applicant to evaluate as part of an assessment of any potential site. The Highways Authority would be consulted as part of any planning application and if access to the site was an issue, this would be raised during this process.	No change.	341	Leicestershire County Council
SOLAR PANELS ON EXISTING BUILDINGS/NEW BUILDINGS				
If not in Policy AP3, then elsewhere in the Draft Local Plan, NWLDC should publish a policy that mandates that all new buildings must support roof mounted solar panels unless specific exemption is granted. Solar panels must be on the roofs of buildings. There is no need to lose agricultural land (especially on best and most	Solar panels are not required on new homes through current building regulations. In June 2025 the Government confirmed that new build homes will have solar panels by default through proposed changes in the Future Homes Standard (FHS). The		103, 115, 220, 285, 376, 401, 503	Judith Billington, Protect Diseworth, CPRE Leicestershire, Garry Needham, Jim Snee, Mr Wykes, Helen Warren

APPENDIX A – POLICY AP3 (RENEWABLE ENERGY)

versatile) to solar panels. If necessary, Section 106 agreements should be used to secure this and/or requesting a statutory change in Central Government policy. It is cheaper to fit at building stage rather than retro fitting later.	<p>FHS is expected to be published in Autumn this year.</p> <p>Part (5) of the policy states that proposals for solar energy development should avoid using the best and most versatile agricultural land where possible. Solar farm developments are generally temporary and fully reversible and allow for the land to be maintained in agricultural use during operation and as such should not compromise the agricultural resource.</p>			
New version of SAP11 due in 2025 and also BREEAM towards achieving net zero carbon emissions.	Noted.	No change.	285	Garry Needham
The Renewable and Low Carbon Energy Study states the new target for solar can be achieved from roof tops. Roof tops do not appear in AP3 and should be amended to include the inclusion of roof tops. The policy only refers to housing.	Noted. The Renewable and Low Carbon Energy Study does identify roof-mounted and building-integrated solar energy generation would offer additional resource it does also identify some of the constraints associated with solar panels on industrial buildings. The draft policy (Part (3)) refers to planning applications for renewable energy and this would include applications for roof mounted solar panels.	No change.	527	Julia Howard

APPENDIX A – POLICY AP3 (RENEWABLE ENERGY)

AREAS IDENTIFIED AS POTENTIALLY SUITABLE FOR WIND TURBINES				
The areas Identified as potentially suitable for small scale or medium/large scale turbines defined on the Policies Map are misleading and largely irrelevant. The areas identified as potentially suitable have only been subject to detailed assessments in respect of wind speed and proximity to residential properties. No assessment has been undertaken in respect important factors such as landscape character or potential impacts upon heritage assets or their settings. NWLDC should undertake a sensitivity study to inform Policy AP3.	As detailed on the policies maps the areas identified as potentially suitable for wind energy generation have only been the subject of detailed assessments in respect of wind speed and proximity to residential properties. Detailed assessments in respect of factors such as landscape character or potential impacts upon heritage assets or their settings would need to be undertaken on a site-by-site basis.	No change.	196	Breedon on the Hill Parish Council
We welcome the text relating to heritage assets that is included on the Maps showing areas potentially suitable for small scale or medium/large wind energy.	Noted.	No change.	357	Historic England
Wind power should have sites excluded that should be archaeological protected or deemed to be local wildlife sites.	The areas identified as potentially suitable for wind energy generation have only been the subject of detailed assessments in respect of wind speed and proximity to residential properties. Detailed assessments in respect of factors such as landscape character or potential impacts upon heritage assets or their settings would need to be	No change.	527	Julia Howard

APPENDIX A – POLICY AP3 (RENEWABLE ENERGY)

	undertaken on a site-by-site basis.			
LANDSCAPE IMPACTS				
Agree with the policy with some caveats. It is important to recognise the impact of solar and wind on landscape character and their potential cumulative adverse impact in particular locations. As such, there should be stronger design requirements for solar and wind infrastructure to ensure they are integrated into the surrounding landscape with minimal impact.	Noted. Part (3)(b) of the draft policy seeks to ensure that there is no adverse impact on landscape character. When determining planning applications, the Local Plan should be considered as a whole. Draft Policy S4 (Countryside) Part (2)(a) requires development to respect the appearance and character of the landscape, including its historic character.	No change.	220	CPRE Leicestershire
AGRICULTURAL LAND				
Support paragraph 5 of the policy with respect to the best and most versatile agricultural land. However, suggest that good productive agricultural land; 3b grade land, should also be avoided where possible. If not, then food security is likely to become much more of an issue in the near future.	Policies need to balance renewable energy goals with the preservation of agricultural land. The policy wording is considered appropriate given the temporary and fully reversible nature of solar farm developments. Generally solar farm developments allow for the land to be maintained in agricultural use and as such should not compromise the agricultural resource.		220	CPRE Leicestershire
We welcome the inclusion in point 5 of this policy of the protection of Best	Noted.	No change.	223	Natural England

APPENDIX A – POLICY AP3 (RENEWABLE ENERGY)

and Most Versatile (BMV) agricultural land.				
IMPACT ON EAST MIDLANDS AIRPORT				
The strategic policy approach to renewable energy is supported. The Local Plan policy should recognise and refer to the importance of, and the need for renewable energy installations to have no detrimental effects on aviation safety and aircraft operations at or in the vicinity of EMA. This includes both solar PV arrays and wind turbine developments. This policy should also be consistent with the Local Plan policy in relation to Aerodrome Safeguarding (Policy Ec9).	The Policy currently (Part (4)(c)) refers to proposals needing to consider all impacts on air traffic safety and radar and communications in the context of proposals for wind energy developments. As aviation safety is a consideration for both wind and solar energy developments it is proposed that Part (4)(c) be moved to become Part (3)(d).	Criterion (4)(c) be moved and amended to read: (3)(d) All impacts. The potential impacts on air traffic safety and aircraft operations radar and communications at or in the vicinity of East Midlands Airport have been assessed, consulted upon and addressed.	230	East Midlands Airport
HIGHWAY SAFETY				
National Highways is supportive of renewable energy production proposals in principle; however, wind turbines should not be located on the Strategic Road Network (SRN) where motorists need to pay particular attention, such as the immediate vicinity of connections, sharp bends, and crossings for pedestrians, cyclists and horse-riders as set out in DfT Circular 01/2022 paragraph 65-67. Wind turbines should be sited at a set distance from the SRN to mitigate risks to the safety of road users arising from structural or mechanical	Noted and agree that reference to highway safety is included in the draft policy to ensure this is considered as part of proposals.	Add new criterion (d) to Part (2) of the draft policy to read: (2)(d) There is no adverse impact on highway safety.	112	National Highways

APPENDIX A – POLICY AP3 (RENEWABLE ENERGY)

failure. Paragraph 70 of the DfT circular details that solar farms and wind turbines have the potential to create glint and glare which can be a distraction for drivers. Where these developments would be visible from the SRN, National Highways should be consulted.				
OTHER COMMENTS				
There is an enormous local concentration of knowledge on all types of renewable energy in the area.	Noted.	No change.	103	Judith Billington
Welcome policies to support renewable energy including wind energy. Aggregate Industries have committed to Net Zero and are looking at opportunities to improve our environmental credentials.	Noted.	No change.	107	Aggregate Industries Ltd
The Plan appears to have a thorough strategic consideration of climate change, both mitigation and adaptation. Welcome and support the policy. It is encouraging to see targets for wind and solar generation and that a mapping exercise has been completed to identify areas potentially suitable for small and large-scale wind turbines. The support of onshore wind developments, providing they meet conditions, is also a positive feature of the draft Plan.	Noted.	No change.	353	Derbyshire County Council

APPENDIX A – POLICY AP3 (RENEWABLE ENERGY)

Renewable energy technologies use input energies and convert them to electrical energy. Examples include solar panels and wind turbines. Heat pumps need electricity to work and so are not a renewable energy technology; they are a low carbon technology. Confusing these ideas does not give confidence in the overall plan.	Noted. The draft policy itself does not refer to heat pumps. However, Paragraph 5.11 of the supporting text identifies heat pumps as a form of renewable energy and whilst they can be if the electricity used to power them is from a renewable source it is considered that the paragraph be amended to avoid confusion.	Amend the supporting text to remove reference to heat pumps as a form of renewable energy.	396	Siobhan Dillon
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APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

CHAPTER: 5	POLICY NUMBER: Ap4	POLICY NAME: REDUCING CARBON EMISSIONS
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MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
SUPPORT				
SEGRO supports the draft wording of Policy AP4. Given the rapidly changing technologies and approaches to sustainable design, it is important to ensure that the policy wording is not too inflexible or could conflict with, or pre-empt, Government legislation and building regulations in the future.	Noted.	No change.	290	Delta Planning obo SEGRO
<p>The policy rightly highlights the role of the planning system in supporting the transition to a low-carbon future. The use of the Energy Hierarchy is a positive way to encourage developers to take a holistic view to design low energy buildings. DCC also supports and welcomes:</p> <ul style="list-style-type: none"> •“pollution and climate change” referenced as an important consideration for health and wellbeing •The process of updating the Strategic Flood Risk Assessment in the light of climate change •A presumption for SuDS as part of new development unless inappropriate (Draft Policy AP8) 	Noted.	No change.	353	Derbyshire Country Council

APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

•The consideration of the impact of climate change on water availability Climate change referenced as relevant to green and blue infrastructure and open space (Draft Policy IF3)				
(1) Development is required to contribute to the Council's aim for a carbon neutral district by 2050. To achieve this, all new development will be required to demonstrate how the following requirements are satisfied				
Ap4 (1) - the requirement for ALL development to demonstrate measures to minimise energy consumption and follow the energy hierarchy is excessive and a significant burden and cost on applicants (and the LPA). These requirements are not contained in the NPPF and should be dealt with at Building Regulation stage.	It is not proposed that the policy wording be amended at this stage but to rather await the outcome of the forthcoming whole plan viability assessment which will inform the Regulation 19 version of the Local Plan. Some minor wording changes to Part (1) are proposed.	Part (1) be amended to read: Development is required to contribute to the Council's aim for a carbon neutral district by 2050. To achieve this, all new development will be required to demonstrate that how the following requirements are satisfied:	8	JJM Planning
(1)(a) Achieve energy efficiency targets in line with the latest standards at the time a planning application is determined, as set by national policies (including any transitional arrangements)				
Recommend Part (1)(a) be reworded to reference 'achieving energy efficiency targets in line with the latest national standards' or include reference to The Future Homes Standard and Building Regulations as the appropriate standards of development for 'energy efficiency targets at the time'.	Noted. It is proposed that a new Part 1(a) be added to the policy to refer to renewable energy generation. As a result of the above change the current Part 1(a) will be come Part 1(b). It is considered that adding reference to national standards would provide clarity	Part (1)(a) be added to read: (1)(a) On-site renewable energy generation is maximised as much as possible; Part 1(b) be amended to read:	183, 214	Turley obo Clowes Developments (UK) Ltd, Redrow Homes, Stantec UK Ltd obo Bloor Homes Midlands and Taylor Wimpey

APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

	on the standards being referred to, text is proposed to be added to Part 1(b).	Achieve Energy efficiency targets in line with the latest national standards at the time a planning application is determined, will be achieved as set by national policies (including any transitional arrangements); and		Strategic Land Ltd and Wilson Enterprises Ltd
(1)(b) Demonstrate that measures have been taken to minimise energy consumption by following the steps in the energy hierarchy;				
There should be flexibility in the policy to consider site specific constraints and feasibility and viability implications.	It is not proposed that the policy wording be amended at this stage but to rather await the outcome of the forthcoming whole plan viability assessment which will inform the Regulation 19 version of the Local Plan.	No change.	183, 214	Turley obo Clowes Developments (UK) Ltd, Redrow Homes Ltd and Wilson Enterprises Ltd, Stantec UK Ltd obo Bloor Homes Midlands and Taylor Wimpey Strategic Land
(1)(c) Major developments will be required to demonstrate that measures have been taken to reduce lifecycle carbon emissions and maximise opportunities for the reuse of materials.				
Recommend that detailed applications are supported by a Whole Life Cycle Assessment which includes consideration of the upfront embodied carbon of new development and measure to reduce embodied carbon	It is not proposed that the policy wording be amended at this stage but to rather await the outcome of the forthcoming whole plan viability assessment	Part (1)(c) becomes Part (2) of the policy. No wording changes are proposed to this part of the policy.	183	Turley obo Clowes Developments (UK) Ltd, Redrow Homes

APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

emissions. Recommend Part (1)(c) be reworded to read: <i>Major development will need to demonstrate that measures have been taken to reduce lifecycle carbon emissions and maximise opportunities for the reuse of materials. Detailed major applications should include a Whole Life Cycle Assessment to demonstrate how upfront carbon has been considered and reduced where feasible and viable.</i>	which will inform the Regulation 19 version of the Local Plan. However, as criteria (1)(c) refers to the requirements of major developments it is considered that this criterion should be separated as Part (1) of the policy refers to the requirements for all development.			Ltd and Wilson Enterprises Ltd
Strongly support a requirement for Whole Life Cycle carbon assessments on medium sized and large development schemes. A checklist may be appropriate for small schemes.	Noted.	No change.	92	Ashby de la Zouch Town Council
Strongly support the inclusion of this section. Recognise the rationale for not repeating in the Local Plan issues covered by separate regulation. Welcome the order of the Energy hierarchy. Note the proposed removing of the requirement for a Whole Life Cycle carbon assessment but strongly suggest that this decision is kept under review while further work is undertaken with the aim of the need for such an assessment being required in the future.	Noted.	No change.	404	The Environment Agency
Unfortunate that the requirement to conduct Whole Life Cycle (WLC) carbon assessments has been removed, but	Noted.	No change.	353	Derbyshire County Council

APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

the reasoning for this is understood. It is encouraging that the plan still references the use of WLC as a useful tool.				
The plan to consider WLC assessments of future developments, is a step forward, however the plan then introduces the words 'not...economically viable' with reference to a district fund. The opportunity for new homes and industrial units to consider net zero during the development would be more effective.	Noted.	No change.	651	Amanda Hack
(2) Renewable energy generation should be maximised as much as possible on-site. Where the use of on-site renewables to match the total energy consumption of the development/site is demonstrated not to be technically feasible or economically viable, a financial contribution will be required to the council's carbon offset fund to enable residual carbon emissions to be offset by other local initiatives.				
Query the meaning of 'maximised' as much as possible and how it will be measured. The policy is imprecise and open to interpretation that will result in a lot of schemes needing to provide energy consumption figures or financial information. It could also compromise elements of design - covering available roof space with Solar PV, precluding the provision of roof lights, dormer windows etc which would otherwise be part of the design aesthetic of the development. The wording should refer to 'maximise generation where this is feasible and viable, in line with national policy requirements'.	<p>The Policy is seeking to ensure that renewable energy generation is utilised as much as possible on a proposed development site.</p> <p>Reducing the carbon impact of development and the design of development is a balance. The Draft NWL Good Design Guide was published for consultation on 23 July 2025. The draft Design Guide builds on the adopted Good Design SPD and includes sections on energy and resource efficiency and sets out</p>	No change.	8, 183	JJM Planning, Turley obo Clowes Developments (UK) Ltd, Redrow Homes Ltd and Wilson Enterprises Ltd

APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

	how these elements can be integrated into the design of developments.			
Recommend Part (2) be reworded to read: Renewable energy generation should be maximised as much as possible on site, <i>where feasible and viable in line with national standards</i> . Where the energy consumption of the site cannot be met by the use of on-site renewables, a financial contribution will be required to the Council's carbon offset fund.	Noted. At this stage it is considered that the council is not in a position to be able to commit to setting up a carbon offset fund. This is due to available resources, expertise and the need to get the Local Plan submitted. Officers have had informal conversations with AECOM who undertook the Renewable and Low Carbon Energy Study (2021) who advise that setting up a carbon offset fund would not currently be viable for a district of our size.	The current Part (2) of the policy be deleted.	183	Turley obo Clowes Developments (UK) Ltd, Redrow Homes Ltd and Wilson Enterprises Ltd
Strongly support the policy particularly a council run carbon offset fund, provided (as proposed) it is not available to developers to avoid their statutory carbon reduction requirements under the new building regulations, and the fund is used to boost local carbon reduction schemes which otherwise could not be funded.			92	Ashby de la Zouch Town Council
In terms of a potential carbon offset fund it is noted that a viability assessment has not yet been completed and will be part of the next stages of work. There is a lack of detail about the Council's carbon offset fund. Support measures that can help carbon reductions in line with the Government's 2023 Written Ministerial Statement.			183	Turley obo Clowes Developments (UK) Ltd, Redrow Homes Ltd and Wilson Enterprises Ltd

APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

Jelson has no objection to Part (a) of the Policy. The remainder of Policy AP4 is not consistent with national policy, is not justified and is not demonstrably effective. Therefore, the Policy is not sound and, in the light of the fact that Part (a) adds nothing over Building Regulations, it should be deleted.			243	Avison Young obo Jelson Homes
DCC welcomes the reference to a carbon offset fund as a last resort where low carbon construction cannot be met.			353	Derbyshire Country Council
If it is not economically viable to provide renewables onsite, it is unlikely that it will be economically viable to contribute to the Council's Offset Fund. there needs to be transparency in relation to the financial contribution required to the Council's Carbon Offset Fund and specific local initiatives need to be identified within the Infrastructure Delivery Plan. This would be a particular disincentive to businesses as outline applications for industrial and warehousing units will not necessarily be on a pre-let basis and therefore the occupier will not be known. The total energy consumption will depend on occupier requirements. In this respect, the policy wording in its current form would not be consistent with national policy.			185, 186, 187, 656	Pegasus Group obo Clowes Developments (UK) Ltd, Pegasus Group obo Wilson Bowden Developments Ltd, Define Planning and Design Ltd obo Bloor Homes Ltd, Define Planning and Design Ltd obo Rosconn Strategic Land

APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

<p>Policy AP4 could be burdensome, particularly for industry with high operational energy requirements and no prospect of meeting those on site. Developers need a relative level of certainty regarding the financial commitments from the outset of delivering a scheme. Policy should provide additional flexibility that would require developments to meet the requirements as far as possible in the confines of a viable development; requiring viability assessments to demonstrate that if the Council sees fit. Given that the Council are seeking contributions towards their own offsetting scheme, this needs to be in place in quickly with sufficient capacity to support the scale of growth required in the plan period. NWLDC should ensure that the offsetting scheme is specific and measurable and that it supports a tariff / credit-based approach that is CIL compliant.</p>	<p>It is not proposed that the policy wording be amended at this stage but to rather await the outcome of the forthcoming whole plan viability assessment which will inform the Regulation 19 version of the Local Plan.</p> <p>At this stage it is considered that the council is not in a position to be able to commit to setting up a carbon offset fund. This is due to available resources, expertise and the need to get the Local Plan submitted. Officers have had informal conversations with AECOM who undertook the Renewable and Low Carbon Energy Study (2021) who advise that setting up a carbon offset fund would not currently be viable for a district of our size.</p>	<p>The current Part (2) of the policy be deleted.</p>	<p>187, 225, 226, 229, 656</p>	<p>Define Planning and Design Ltd obo Bloor Homes Ltd, Planning Prospects Ltd obo St Modwen Logistics, Oxalis Planning and Pegasus Group obo Harworth Estates and Caesarea, Planning Prospects Ltd obo P, W, C & R Redfern, Define Planning and Design Ltd obo Rosconn Strategic Land</p>
<p>The WMS of 13th December 2023 informed councils that the government expects examiners to reject local plans where local energy efficiency standards go beyond current national policy provisions. This same rationale should apply to requiring sites to match their total energy consumption on site or pay financial contributions. This would go way beyond the national requirements</p>	<p>There has been a recent (25 July 2025) Court of Appeal judgement on the Written Ministerial Statement (December 2023) which confirmed that LPAs can set energy efficiency standards above national regulations, provided they are justified by local circumstances, backed by evidence, have a clear rationale</p>	<p>The current Part (2) of the policy be deleted.</p>	<p>193, 211, 216, 235</p>	<p>Pegasus Group obo Hallam Land Management, Pegasus Group obo Davidsons Developments Limited, Pegasus Group obo Westernrange</p>

APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

and has the potential to undermine viability and delivery and compete with the provision of other forms of infrastructure. A site-by-site approach to energy generation also has the potential to undermine economies of scale in the provision of sustainable sources of energy and conflict the efficient use of land.	and are supported by viability evidence. It is unclear whether the Government intends to appeal the decision. It is not proposed that the policy wording be amended at this stage but to rather await the outcome of the forthcoming whole plan viability assessment which will inform the Regulation 19 version of the Local Plan.			Limited, Pegasus Group obo Davidsons Developments Limits and Westernrange Limited
The policy should allow for credit to be given where a development can demonstrate its energy, beyond what is generated onsite, is sourced from a provider offering a supply from renewable sources.	Noted.	No change.	225, 229	Planning Prospects Ltd obo St Modwen Logistics, Planning Prospects Ltd obo P, W, C & R Redfern
OTHER COMMENTS				
CROSS REFERENCE TO OTHER LOCAL PLAN POLICIES				
There should be a cross reference to policy AP8 to encourage sustainable drainage and water sensitive design to manage water on site as part of climate change adaptation.	Noted, as part of the Regulation 19 Local Plan consideration will be given to how to show linkages between policies.	No change.	223	Natural England
Policy AP4 would benefit to having an additional criteria and/or cross-reference(s) to relevant policies elsewhere in the draft Plan with respect to promoting sustainable travel as a key	Noted, as part of the Regulation 19 Local Plan consideration will be given to how to show linkages between policies.	No change.	341	Leicestershire County Council

APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

component in reducing carbon emissions.				
NATIONAL REQUIREMENTS				
<p>Draft Policy AP4 is unnecessary, it duplicates and goes beyond national requirements and planned building regulations. The December 2023 Written Ministerial Statement (WMS) states that ‘a further change to energy efficiency building regulations is planned for 2025 meaning that homes built to that standard will be net zero ready and should need no significant work to ensure that they have zero carbon emissions as the grid continues to decarbonise. Nationally applied standards provide clarity and consistency for developers.</p> <p>The WMS further details that ‘the Government does not expect plan-makers to set local energy efficiency standards for buildings that go beyond current or planned buildings regulations’. The WMS also informed councils that the government expects examiners to reject local plans where local energy efficiency standards go beyond current national policy provisions. Building Regulations and the emerging Future Homes Standard offer the most appropriate mechanisms to deliver low carbon and energy efficient developments.</p>	<p>The Future Homes Standard (FHS) is expected to be published this autumn, and the Government has confirmed (in June 2025) that the FHS will include changes to Building Regulations to require new homes to include solar panels. The Government are also expected to consult on the National Development Management Policies (NDMP) in autumn 2025. In addition, a recent (25 July 2025) Court of Appeal judgement on the Written Ministerial Statement (December 2023) confirmed that LPAs can set energy efficiency standards above national regulations, provided they are justified by local circumstances, backed by evidence, have a clear rationale and are supported by viability evidence. It is unclear whether the Government intends to appeal the decision.</p> <p>The changes expected to be introduced by the FHS highlights the Government’s intentions to include more energy efficient measures in new developments.</p>	<p>As set out above Part 1(b) will be amended to read: Achieve Energy efficiency targets in line with the latest national standards at the time a planning application is determined, will be achieved as set by national policies (including any transitional arrangements); and</p>	<p>8, 147, 150, 161, 183, 184, 187, 193, 211, 216, 235, 237, 656</p>	<p>JJM Planning, Gladman Developments Ltd, Savills obo David Wilson Homes (East Midlands), Mather Jamie obo The Trustees of Lord Crawshaw 1997 Discretionary Settlement (the Whatton Estate, Turley obo Clowes Developments (UK) Ltd, Redrow Homes Ltd and Wilson Enterprises Ltd, Pegasus Group obo Hallam Land Management, Define Planning and Design Ltd obo Bloor Homes Ltd, Pegasus Group obo Hallam Land Management,</p>

APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

<p>It would be appropriate to make to the reference latest 'national' standards or the 2025 Future Homes Standard and the Building Regulations as the appropriate standards for development.</p> <p>Essential that Draft Policy AP4 is fully evidenced, justified, and included in viability considerations.</p>	<p>It is possible that energy efficiency requirements may be included in the NDMP. In view of the current uncertainty at the national level we have kept changes to this policy to a minimum but intend to keep the policy under review.</p> <p>As above, it proposed that Part (1)(a) include reference to the latest national standards.</p>			<p>Pegasus Group obo Davidsons Developments Limited, Pegasus Group obo Westernrange Limited, Pegasus Group obo Davidsons Limits and Westernrange Limited, Home Builders Federation, Define Planning and Design Ltd obo Rosconn Strategic Land</p>
<p>The policy needs to be clear that all development should meet minimum statutory requirements. It also fails to include reference to the provisions of NPPF para 164.</p>	<p>Noted, it is not necessary for Local Plan policy to repeat the NPPF. However, it is considered that the supporting text could be amended and make reference to the requirements in the NPPF.</p>	<p>The supporting text be amended as detailed.</p>	<p>341</p>	<p>Leicestershire County Council</p>
<p>The Government is to introduce a set of National Development Management Policies, which is likely to include further guidance on the energy performance of development and provide a consistent approach.</p>	<p>Noted. It has been reported that the Government have delayed consultation on the National Development Management Policies (NDMP). It is now anticipated that consultation on</p>	<p>No change.</p>	<p>183</p>	<p>Turley obo Clowes Developments (UK) Ltd, Redrow Homes Ltd and Wilson Enterprises Ltd</p>

APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

	the NDMP will take place in autumn 2025.			
SOLAR PANELS ON NEW BUILDS				
NWLDC should strengthen the policy to make it compulsory and mandate the use of solar roof panels on all new builds. If necessary, it should prevail upon Central Government to mandate the policy.	The Future Homes Standard (FHS) is expected to be published this autumn, and the Government has confirmed (in June 2025) that the FHS will include changes to Building Regulations to require new homes to include solar panels. As such, it would be a functional requirement of the Building Regulations.	No change.	115, 175, 255, 352, 487	Protect Diseworth, Oakthorpe, Donisthorpe and Acresford Parish Council, Johnathan Aust, Jeffrey Guy, Mary Lorimer
Whilst there are several references to energy saving techniques electric vehicle charging points seem to have been overlooked.	In England, Part S of the Building Regulations (Infrastructure for charging electric vehicles) requires new and significantly renovated buildings with parking to have EV charge points and cable routes. There is no need to repeat this requirement in the Local Plan.	No change.	175, 255	Oakthorpe, Donisthorpe and Acresford Parish Council, Johnathan Aust
Note that the FHS and FBS consultation includes requirements for the provision of Solar PV on new development from 2025.	The Future Homes Standard (FHS) is expected to be published this autumn, and the Government has confirmed (in June 2025) that the FHS will include changes to Building	No change.	183	Turley obo Clowes Developments (UK) Ltd, Redrow Homes Ltd and Wilson Enterprises Ltd

APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

	Regulations to require new homes to include solar panels.			
WIND TURBINES/WIND FARMS				
Unaware of any large-scale housing developer who can deliver carbon neutral dwellings at scale. Therefore, external energy sources will be required, and the use of renewable energy sources should be made mandatory. As all non-residential sites across North-West Leicestershire appear “potentially suitable for small scale wind energy” (Local Plan – “Map showing areas potentially suitable for small scale wind energy”), perhaps a policy of incorporating wind farms into the development should be considered: perhaps replacing the proposed warehousing fronting onto the A453, with a wind farm.	<p>Noted. The Future Homes Standard (FHS) is expected to be published this autumn, and the Government has confirmed (in June 2025) that the FHS will include changes to Building Regulations to require new homes to include solar panels.</p> <p>Whilst it appears that large areas of the district are identified as potentially suitable for wind energy, these areas have only been the subject of detailed assessments in respect of wind speed and proximity to residential properties. Detailed assessments in respect of factors such as landscape character or potential impacts upon heritage assets or their settings would need to be undertaken on a site-by-site basis.</p>	No change.	352	Jeffrey Guy
ENERGY EFFICIENCY				
Paragraph 5.33: The first bullet point states that “The use of high energy efficiency lighting and mechanical	Noted. It is considered that the supporting text could include	The supporting text be amended as detailed.	139	Leicester City Council

APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

ventilation with heat recovery should also be considered.” It is preferable to avoid installing mechanical ventilation systems as they increase energy consumption and carbon emissions during the summer. This runs counter to purpose of the “Energy Reduction” section of the Energy Hierarchy. Heat recovery should be utilised wherever mechanical ventilation are installed but it should be made clear that the use of mechanical ventilation systems should only be acceptable where less energy intensive options have been considered beforehand and found not to be appropriate.	information regarding the use of mechanical ventilation systems.			
GREENHOUSE GAS EMISSIONS				
Para. 5.26 states that greenhouse gas emissions will need to be reduced but there will be huge additional demands as regards traffic and this will just add to the emissions of greenhouse gases, as well as causing increased congestion.	There is a national intention to move towards the use of electric vehicles, this, coupled with on-site measures such as solar panels seeks to reduce greenhouse gas emissions.	No change.	350	Teresa Walker
REGULATED/UNREGULATED ENERGY				
Unclear if the policy relates to regulated or unregulated energy. Policy requirements should only relate to regulated energy and carbon emissions. Developers do not have control over unregulated energy and carbon emissions. Utilising the Local Energy Efficiency Standards Update (WMS) as support the policy should make it clear	Noted, it is considered that wording could be added to the supporting text that sets out that developments can only address regulated energy and carbon emissions.	The supporting text be amended as detailed.	183	Turley obo Clowes Developments (UK) Ltd, Redrow Homes Ltd and Wilson Enterprises Ltd

APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

that any requirements which go beyond national standards should only relate to regulated energy and that the requirements of the policy are subject to feasibility and viability. At this stage the embodied carbon of new development is not considered as part of the Building Regulations, however, as part of the FHS and FBS consultation the Government has requested information on embodied carbon, and it is likely that embodied carbon will be included in the future.				
OTHER COMMENTS				
Concerned about the level of detail that is required at the various stages of the application process (outline, reserved matters or full). An outline application would not provide the same level of detail as a reserved matters or full application.	Noted. It is considered that some additional supporting text that sets the requirements would help clarify this matter.	The supporting text be amended as detailed.	147	Gladman Developments Ltd
The proposed policy requirements to seek evidence that proposals have sought to minimise energy consumption and maximise renewable energy generation are appropriate.	Noted.	No change.	187	Define Planning and Design Ltd obo Bloor Homes Ltd
In response to the 2022 consultation the CPRE stated that a strategic policy should be set out at the front of the plan to address Climate Change and meet net-Zero targets. Although the importance of Climate Change as a	It is not a requirement to have an overarching policy. As part of the Regulation 19 Local Plan consideration will be given to how to show linkages between policies.	No change.	220	CPRE Leicestershire

APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

cross-cutting issue is acknowledged, the document does not sufficiently recognise that Climate Change mitigation should be a key strategic priority for the plan and addressed through a Strategic Climate Change Policy. Concerned that without such a focus climate change considerations will not feature strongly enough in the decisions about the location, design and delivery of new developments. Perhaps more will be clearer when the Design Policy is set out in the Plan. See South Worcestershire Development Plan Review: Regulation 19 Publication Document, November 2022.				
Recommend the Plan include positive policy wording to address climate change mitigation and adaptation which recognises that biodiversity loss and climate change are interlinked. Climate Change policies should include policy guidance on “Nature-Based Solutions” which can play an important role in aiding climate change adaptation. This approach creates better linked habitat networks which will build up resilience to climate change at a landscape scale. The policy should also recognise the important role of Green Infrastructure in climate change mitigation and adaptation.	Noted. It is considered that the supporting text could be amended to include reference to the role green infrastructure plays in climate change mitigation and adaptation.	The supporting text be amended as detailed.	223	Natural England

APPENDIX A – POLICY AP4 (REDUCING CARBON EMISSIONS)

SEGRO recognises that real estate is a significant contributor to carbon emissions through the construction and operation of buildings. SEGRO has made it its priority to eliminate as far as possible the carbon emissions from the construction of new buildings and the operation of existing buildings to ensure that any residual carbon is offset or absorbed meaningfully and effectively.	Noted.	No change.	290	Delta Planning obo SEGRO
Our schools have a focus on the climate agenda from both the teaching and learning perspective as well as new schools designed to be low carbon. Schools need to be energy efficient to support the climate agenda and minimise revenue costs so more of their budget can focus on teaching and learning.	Noted.	No change.	341	Leicestershire County Council
Will a provision be put in place to restrict the sourcing of materials from within a set local distance. Such as bricks from Ibstock brick (Ibstock site) or Forterra (Desford site). This will reduce carbon footprint.	This is beyond the scope of planning.	No change.	414	Emily Massey
Provision for active travel - Failed at Grange Road site with no direct cycle access to Coalville town centre.	Noted. This is not within the scope of this policy.	No change.	487	Mary Lorimer

APPENDIX A – POLICY AP5 (HEALTH AND WELLBEING)

CHAPTER: 5		POLICY NUMBER: AP5	POLICY NAME: HEALTH AND WELLBEING		
MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME	
Support					
Support the policy and welcome the consideration of health and wellbeing in the Local Plan and it's joining up with the Health and Wellbeing Strategy and the NWL Community Health and Wellbeing Plan. Agree that careful planning can positively contribute to a range of health benefits.	Noted.	No change.	45	Leicester, Leicestershire and Rutland ICB	
Welcome the inclusion of the Policy but suggest it could be strengthened. Policy appears to put onus on the Council without giving it extra powers to require developers to contribute. In addition to listing what the Council will support, developer requirements should be identified to ensure the health and wellbeing of communities, including contributions towards the creation of safe walking and cycling infrastructure.	Development proposals will be assessed against the Local Plan as a whole. Draft Policy IF1 sets out the type of infrastructure required to support new developments, as such they do not need to be repeated in this policy.	No change.	92	Ashby de la Zouch Town Council	
Good to see a strong section on Health and Wellbeing. As this is a cross-cutting issue that is relevant to many of the topic areas in the Local Plan consideration could also be given to adding extra reference to Health and Wellbeing throughout the plan. This	Noted, as part of the Regulation 19 Local Plan consideration will be given to how to show linkages between policies.	No change.	139	Leicester City Council	

APPENDIX A – POLICY AP5 (HEALTH AND WELLBEING)

would give the issue greater emphasis and ensure this critical issue is central to the aims of the Local Plan.				
<p>Policy is supported. Being active should be an intrinsic part of everyone's daily life and the design of where we live and work plays a vital role in this. Good design should contribute to making better places and create environments that make the active choice the easy choice for people and communities.</p> <p>The Active Design Guidance (2023) seeks to help planners, designers and those involved in delivering and managing our places to create and maintain active environments. The principles set out in the Guidance are aimed at contributing towards the Governments desire for the planning system to promote healthy communities through good urban design.</p>	<p>Noted. Policy AP5 will complement other policies in the Local Plan including those which address the design of new development.</p> <p>The Draft NWL Good Design Guide was published for consultation on 23 July 2025. The draft Design Guide builds on the adopted Good Design SPD and includes elements on health and wellbeing and sets out how the design of developments can contribute to health and well-being.</p>	No change.	143	Sport England
Supports the provision of an overarching health and wellbeing policy. The proposed policy is informed through the utilisation of relevant evidence to support a specific overarching policy for healthy lifestyles that will ensure that policies meet the health and wellbeing needs of the	Noted.	No change.	185, 186	Pegasus Group (Clowes Developments Ltd), Pegasus Group (Wilson Bowden Developments Ltd)

APPENDIX A – POLICY AP5 (HEALTH AND WELLBEING)

district's population over the plan period.				
Support this policy and note the Council's support for the delivery of a safe walking and cycling network. The ability to walk and cycle often and effectively is a major consideration in the new locations of development and in their design and layout. Safe and attractive links to schools would help young people appreciate the freedom and other benefits of a less car-dependent lifestyle.	<p>Noted. This approach will also be supported by other policies in the Local Plan, including IF5: Transport Infrastructure.</p> <p>The Draft NWL Good Design Guide was published for consultation on 23 July 2025. The draft Design Guide builds on the adopted Good Design SPD and includes elements on health and wellbeing and sets out how the design of developments can contribute to health and well-being.</p>	No change.	220	CPRE Leicestershire
Welcome this policy however suggest that it could also include the importance of contact with nature. See comments under AP5 (2)(d).	See response under AP5 (2)(d).	No change.	223	Natural England
Support this policy which promotes high quality accessible and inclusive environments. It is consistent with paragraph 96 and 97 of the NPPF and in particular paragraph 96c). The delivery of housing in the right locations with access to jobs and services, along with leisure and recreation space is vitally important.	Noted. When assessing proposals, the Council will give consideration to how schemes can positively contribute to the health and wellbeing of our communities. This approach will be supported by this policy and	No change.	232	Stantec Uk Ltd (Caddick Land)

APPENDIX A – POLICY AP5 (HEALTH AND WELLBEING)

The Council should prioritise Land south of Ashby Road, Kegworth, given its highly sustainable location and access to considerable employment opportunities along with local services and facilities.	other policies in the Local Plan.			
From a Public Health perspective draft policy AP5 is supported. The draft policy identifies the importance of wider determinants including housing design and access to employment on health outcomes.	Noted.	No change.	341	Leicestershire County Council
Welcome this policy, particularly paragraph 5.46: Pollution and Climate Change.	Noted.	No change.	404	The Environment Agency
AP5 (1) Development that maintains and improves the health and wellbeing of our residents, encouraging healthy lifestyles by tackling the causes of ill health and inequalities will be supported. Health considerations will be embedded in decision making and the Council will support the creation of a high quality, accessible and inclusive environment.				
The policy should be expanded to reflect mental health, in e.g. in respect of social isolation.	Agree the policy should be amended to refer to both the physical and mental health and wellbeing of residents.	Amend Part (1) of the policy to read: “Development that maintains and improves the physical and mental health and wellbeing of our residents...”	341	Leicestershire County Council
Would it be possible to change the word ‘lifestyles’ and instead of ‘encouraging healthy lifestyles’ the wording becomes ‘enable healthier choices’ and in 5.46 bullet point	Noted and agree the suggested amendments.	Amend Part (1) of the policy to read: “... encouraging healthy lifestyles enables healthier choices by	341	Leicestershire County Council

APPENDIX A – POLICY AP5 (HEALTH AND WELLBEING)

<p>'healthy lifestyles' becomes 'healthier choices'.</p> <p>There is an emerging public health evidence base to suggest the word 'lifestyles' is a problematic word because it implies their individual choices and behaviours solely responsible for health outcomes this perspective overlooks the influence of social economic and environmental factors on health. Public Health would advocate for more inclusive language such as 'health choices' or 'health practices' which would emphasise the broader context in which individual choices are made.</p>		<p>tackling the causes of ill health and inequalities will be supported."</p> <p>The supporting text will also be amended to reflect the revised wording.</p>		
<p>The local plan has a key role in helping to create healthy places. The local plan should require health impact assessments for large scale developments, i.e., developments which are greater than 700 homes where a new primary school would be required and will form an important part of the new community.</p>	<p>Draft Policy AP6 Health Impact Assessments sets out the requirements and thresholds for when a Health Impact Assessment would be required.</p>	<p>No change.</p>	<p>341</p>	<p>Leicestershire County Council</p>
<p>Comments from a LCC Landowner Perspective:</p> <p>The policy aspires to meet the guidance given in NPPF at section 8. It would give greater clarity if it referred</p>	<p>Noted. The policy states that health considerations will be embedded in decision making and it sets out a range of criteria that development must meet to be supported.</p>	<p>No change.</p>	<p>341</p>	<p>Leicestershire County Council</p>

APPENDIX A – POLICY AP5 (HEALTH AND WELLBEING)

specifically to development being required to meet those standards.				
AP5 (2) To achieve this, the Council will: (a) Ensure homes are high quality, good homes and allow people to live healthy lives within them and remain in their homes for longer				
Support criteria (a) to (g) of Part (2) of the draft policy.	Noted.	No change.	115	Protect Diseworth
AP5 (2) To achieve this, the Council will: (c) Support the delivery of a safe walking and cycling network to increase access to active travel, considering active design within development and connections with the wider community, services and employment opportunities.				
The inland waterway network can play a role in supporting the aims of Policy AP5 and play a valuable role in encouraging people to be more active, (for example, canoeing, walking and cycling along towpaths, sustainable travel). The health and wellbeing of communities is an important consideration, and new development should consider ways opportunities to pursue healthier and more active lifestyles can be maximised. Waterways provide a free to use resources and support the aims of 2(c) and (d). This positive role should be referenced within the policy or its supporting text.	<p>This is a strategic policy that explicitly states the councils support for the health and wellbeing of the district. The specific elements that contribute to our health and wellbeing are dealt with by other policies in the Local Plan.</p> <p>It would be more appropriate to add additional supporting text to the Ashby Canal Policy to reference the potential health and wellbeing benefits of the restoration of the Ashby Canal.</p>	No change to policy AP5 but additional supporting text added to Policy IF7 (Ashby Canal) to reference the potential health and wellbeing benefits of the restoration of the Ashby Canal	132	Canal and River Trust
Ensure that no public rights of way are removed due to the development of an area i.e. New Swannington proposed development.	Generally, the retention of public rights of way is preferable. Other Policies in the Local Plan (such as Policy IF1 Development and	No change.	289	Swannington Parish Council

APPENDIX A – POLICY AP5 (HEALTH AND WELLBEING)

	Infrastructure) support the provision of public footpaths as part of new developments.			
AP5 (2) To achieve this, the Council will: (d) Promote and increase access to, and the protection and improvement of, green and blue spaces, sports facilities and play and recreation opportunities.				
Welcome the inclusion of blue and green infrastructure but could be expanded to explain further the health benefit of good access to high quality green space. Green and blue spaces provide opportunities for more active and healthy lifestyles and therefore have a positive impact on preventing health issues. GI can supply other health benefits through helping address some of the environmental causes of poor health, such as poor air quality (by filtering particulates) and reducing urban summer temperatures by cooling air. The representation includes a list of the elements that GI should seek to achieve. Consider incorporating or cross-referencing these health aspects with Policy IF3 – Green and Blue Infrastructure.	Agree that the incorporation of Green Infrastructure (GI) within development is an important objective, but it is considered that the issue is adequately addressed in other draft policies of the Local Plan. Additional commentary about Natural England's Green Infrastructure Framework: Principles & Standards to be added to the supporting text for Policy IF3.	No change.	223	Natural England
There is a requisite for new development to provide and increase access to/to protect and improve green and blue spaces. Green spaces are essential.	Agree that the incorporation of Green Infrastructure (GI) within development is an important objective, but it is considered that the issue is adequately addressed by	No change.	350	Teresa Walker

APPENDIX A – POLICY AP5 (HEALTH AND WELLBEING)

	other policies in the Local Plan.			
AP5 (2) To achieve this, the Council will: e) Maintain and improve accessibility to healthcare, social care, education and community facilities and wider support services.				
To improve accessibility to healthcare, engagement with the ICB is recommended, to inform further refinement of the Infrastructure Delivery Plan as part of the Local Plan review process.	Noted and information/advice from the ICB will feed into an update of the Council's Infrastructure Delivery Plan, which is currently being undertaken.	No change.	245, 256	Evolve Planning (Bloor Homes), Evolve Planning (Cameron Homes)
We support the point regarding quality of life can be improved through better access to education and skills.	Noted.	No change.	341	Leicestershire County Council
AP5 (2) To achieve this, the Council will: (f) Prevent negative impacts on residential amenity and wider public safety from noise, ground instability, ground and water contamination, vibration and air quality.				
Particularly welcome this section of the policy.	Noted.	No change.	404	The Environment Agency
AP5 (2) To achieve this, the Council will: (g) Support healthy eating and promote healthy food choices, through opportunities for sustainable food development, such as allotments and community growing places, and controlling the location of, and access to, take away uses.				
This section refers to controlling the location of and access to take away uses. What does this mean? This should refer to a specific policy that provides details on what is and is not acceptable.	In assessing planning applications, the Local Plan needs to be read as whole. Draft Policy Tc2 (Hot Food Takeaway Uses) sets out the policy consideration for determining applications for hot food takeaways. However, agree that the wording of the policy could be	Amend Part (d) to read "Support healthy eating and promote healthy food choices, through opportunities for sustainable food development, such as allotments and community growing places, and controlling managing the	8	JJM Planning

APPENDIX A – POLICY AP5 (HEALTH AND WELLBEING)

	amended to better reflect the intention of the draft policy.	location of, and access to, take away uses".		
Other comments on Criteria				
Suggest a further criterion (h) is added to AP5 (2) – ensure that rural communities, countryside and the environment are protected from over-development.	Noted. BNG is dealt with in national policy and guidance, in addition to the requirements of draft Policy En1.	No change.	115	Protect Diseworth
General Comments				
It is considered that the proposals at Land at Money Hill accord with all of the measures listed in this policy. As such, broadly supportive of the principle of this policy.	Noted. When assessing proposals, the Council will give consideration to how the scheme can positively contribute to the health and wellbeing of our communities. This approach will be supported by this policy and other policies in the Local Plan.	No change.	214	Stantec (Bloor Homes Midlands and Taylor Wimpey Strategic Land)
Our clients are proactive in creating developments that support resident's health and wellbeing and is an important part of designing a successful development. The Council should consider whether there is a need for a specific health and well-being policy or whether this is a matter already picked up as part of the design and sustainable transport policies.	The inclusion of a specific policy explicitly embeds health and wellbeing within the Local Plan and subsequent decision making. It is considered to represent a balanced approach which ensures that health and wellbeing issues are addressed but without adding significant burdens.	No change.	235	Pegasus Group (Davidsons & Westernrange)

APPENDIX A – POLICY AP5 (HEALTH AND WELLBEING)

<p>Generally, support plans that set out how the Council will achieve health and wellbeing improvements. In its plan preparation the Council should consider health impacts with regard to the level and location of development.</p> <p>Collectively policies should ensure health benefits and limit any negative impacts. Therefore, any development in accordance with the plan should already be contributing positively to the overall healthy objective of that area.</p>	<p>The inclusion of specific policy explicitly embeds health and wellbeing within the Local Plan and subsequent decision making. It is considered to represent a balanced approach which ensures that health and wellbeing issues are addressed but without adding significant burdens.</p>	<p>No change.</p>	<p>237</p>	<p>Home Builders Federation</p>
<p>Recognise the need for development to maintain and improve the health and wellbeing of residents. Health and wellbeing is an important consideration in the creation of high quality, accessible and inclusive communities.</p>	<p>Noted.</p>	<p>No change.</p>	<p>245, 256</p>	<p>Evolve Planning (Bloor Homes), Evolve Planning (Cameron Homes)</p>
<p>In general terms, a Health and Wellbeing policy is supported from a strategic transport perspective. In terms of the proposed wording, it is suggested that it would be beneficial to explicitly reference provision of walking and cycling infrastructure designed where appropriate to LTN 1/20 as part of new development, both in terms of on-site and off-site provision.</p>	<p>The supporting text to draft Policy IF5 (Transport Infrastructure and New Development) identifies that we are in the process of preparing a Local Cycling and Walking Infrastructure Plan (LCWIP). Para. 1.3.2 of LTN 1/20 notes that the guidance should be applied when identifying the infrastructure required to create good quality cycle networks when preparing a</p>	<p>No change.</p>	<p>341</p>	<p>Leicestershire County Council</p>

APPENDIX A – POLICY AP5 (HEALTH AND WELLBEING)

	LCWIP or other local network plan for cycling. As this is a requirement of the LCWIP it is not necessary for this to be duplicated in the Local Plan.			
Improvements in biodiversity and maintaining the rural character of our region is vital for our wellbeing and mental health.	Agree that the incorporation of Green Infrastructure (GI) within development is an important objective. Part (d) of the Policy seeks to promote and increase access to green and blue spaces.	No change.	350	Teresa Walker
Will the building of development be restricted at the weekends and will developers be required to clean roads and keep the dust down during construction?	For some types of development, a Construction Management Plan (CMP) is required as a condition of planning permission. A CMP outlines how a construction project will be managed (including hours of operation), minimising its impact on the environment and surrounding community. Other issues can be managed and enforced through the use of conditions attached to any planning permission granted, for example, require the wheel washing of construction vehicles.	No change.	414	Emily Massey

APPENDIX A – POLICY AP5 (HEALTH AND WELLBEING)

<p>This policy seeks to address Objective 1 of the Local Plan. The supporting text identifies the particular issues faced. The text also acknowledges that health and wellbeing improvements requires more that improving access to medical treatment and services.</p> <p>However, the solutions suggested do not refer to the provision of local facilities, as part of this. If green space is being lost in a community, then the plan should address investment in leisure and recreational facilities as part of new infrastructure provided. Proposed development in Castle Donington is going to reduce the opportunities for walking and cycling therefore the plan should include investment in the provision of leisure facilities such as a leisure centre in order to provide an opportunity for the community to participate in an active lifestyle. Removal of greenspaces will have a long-term impact on the mental and physical health of the community at a cost to the public purse much more then considering investment in facilities that support health and wellbeing from the outset.</p>	<p>This is a strategic policy that explicitly states the councils support for the health and wellbeing of the district. The specific elements that contribute to our health and wellbeing are dealt with by other policies in the Local Plan including (but not limited to), Development and Infrastructure (Policy IF1, Community Facilities (IF2), Green and Blue Infrastructure (IF3) and Open Space, Sport and Recreation Facilities (IF4).</p>	<p>No change.</p>	<p>419</p>	<p>Clare Taylor</p>
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APPENDIX A – POLICY AP6 (HEALTH IMPACT ASSESSMENTS)

CHAPTER: 5		POLICY NUMBER: AP6	POLICY NAME: HEALTH IMPACT ASSESSMENTS		
MAIN ISSUES RAISED		COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
SUPPORT FOR POLICY					
Support the development of Health Impact Assessment criteria and will support Public Health (Leicestershire) when required.		Noted.	A draft policy has been prepared.	45	LLR ICB
Although this policy has not yet been written the principle is strongly supported.		Noted.	A draft policy has been prepared.	92	Ashby de la Zouch Town Council
The approach is agreed, and Public Health will continue to work closely NWLDC on the HIA approach to achieve a streamlined straightforward process. A screening tool has been developed to provide clarity over when and how HIAs would be used, and it would be objectively applied to reduce bureaucracy.		Public Health Leicestershire have developed a HIA template for Leicestershire that can be referenced in local plans. It is considered that a HIA policy will enable development proposals to demonstrate their impact on health and wellbeing and provide a mechanism for any positive impacts to be secured and any negative implications to be mitigated. A draft policy has been prepared that sets out the thresholds and location of development identifying	A draft policy has been prepared.	341	Leicestershire County Council
Agree the need to include a policy relating to Health Impact Assessments (HIA). The policy must be clear on which development proposals an initial Heath Impact Screening Statement will be required. The policy must be clear on local triggers for a HIA. Support further consideration being given to this policy and reserve the right to provide further comment at the next stage of the Local Plan process.				245, 256	Evolve Planning obo Bloor Homes, Evolve Planning obo Cameron Homes
Consider that trigger 2 would be the most suitable as it would ensure localised				214	Stantec UK Ltd obo Bloor

APPENDIX A – POLICY AP6 (HEALTH IMPACT ASSESSMENTS)

standards for all applications of a particular size across the District, providing certainty for developers. The identification of a numerical threshold, such as the number of dwellings, would provide consistency.	<p>when a HIA Screening Statement will be required and subsequently used to determine whether a Health Impact Assessment is required.</p> <p>The draft policy requires all residential proposals of 50 or more dwellings; all major non-residential developments and development located in an identified Area of Concern in the Leicestershire Joint Strategic Needs Assessment (latest edition) to undertake a HIA Screening Statement.</p> <p>The threshold of 50 or more dwellings is considered reasonable and manageable and not too onerous for the small/medium developers.</p> <p>Supporting text will be drafted to provide the context and set out in more detail the requirements of the policy.</p>			Homes East Midlands and Taylor Wimpey Strategic Land
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APPENDIX A – POLICY AP6 (HEALTH IMPACT ASSESSMENTS)

HEALTH IMPACT ASSESSMENTS ALREADY IN THE PPG				
There is no adopted standardised HIA in England which enables local authorities to decide what the process will look like or when it should be required. Health Impact Assessments (HIA) are covered within the PPG which identifies them as a 'useful tool to use where there are expected to be significant impacts', but it also outlines that the Local Plan should consider wider health issues in an area and ensure that policies respond to these. As such Local Plans should already have considered the impact of development on the health and well-being of their communities and set out policies to address any concerns. Consequently, where a development is in line with policies in the local plan a HIA should not be necessary.	It is considered that a HIA policy will enable development proposals to demonstrate their impact on health and wellbeing and provide a mechanism for any positive impacts to be secured and any negative implications to be mitigated. The thresholds applied and the HIA process have been prepared taking into account local circumstances and in collaboration with Public Health Leicestershire.	A draft policy has been prepared.	147, 214, 237	Gladman Developments Ltd, Stantec UK Ltd obo Bloor Homes East Midlands and Taylor Wimpey Strategic Land, Homes Builders Federation
EVIDENCE FOR INDIVIDUAL SCHEMES				
The requirement for HIA for development proposals that meet a particular numerical threshold without any specific evidence that an individual scheme is likely to have a significant impact upon the health and wellbeing of the local population is not justified by reference to the PPG. Only if a significant adverse impact on health and wellbeing is identified should a HIA be required, which sets out measures to substantially mitigate the impact.	A draft policy has been prepared that sets out the thresholds and location of development identifying when a HIA Screening Statement will be required and subsequently used to determine whether a Health Impact Assessment is required.	A draft policy has been prepared.	237	Homes Builders Federation

APPENDIX A – POLICY AP6 (HEALTH IMPACT ASSESSMENTS)

OBJECTS TO POLICY				
Such a policy is unnecessary and objects to the principle of the inclusion of a draft policy, and any requirement at planning application stage for a Health Impact Assessment (HIA). The formulation and end result of HIAs is effectively the collation and duplication of information already submitted as part of any major planning application (i.e. Air Quality Assessment, BREEAM Pre-Assessment, Energy/Sustainability Report, Flood Risk Assessment, Noise Assessment, Transport Assessment etc.). This draft policy would lead to a further layer of bureaucracy providing no additional benefit and resulting in unnecessary time and cost implications for the applicant and the Council to assess information which is already readily available elsewhere via the technical information submitted in support of a planning application. SEGRO therefore considers such a policy unnecessary and should not be included in the Draft Local Plan.	<p>Noted. It is considered that a HIA policy will enable development proposals to demonstrate their impact on health and wellbeing and provide a mechanism for any positive impacts to be secured and any negative implications to be mitigated.</p> <p>A draft policy has been prepared that sets out the thresholds and location of development identifying when a HIA Screening Statement will be required and subsequently used to determine whether a Health Impact Assessment is required.</p>	A draft policy has been prepared.	290	Delta Planning obo SEGRO
HIAs AND OLDER PERSONS HOUSING				
In terms of older person's housing the policy should recognise the health benefits that delivering older people's housing can bring to individuals as well as help reduce the demands exerted on Health and Social Services and other care facilities. The 'Healthier and Happier' Report details the fiscal and wellbeing benefits of building more homes for later living. These include fiscal savings to the NHS and social care services	Noted. It is considered that a HIA policy will enable development proposals to demonstrate their impact on health and wellbeing and provide a mechanism for any positive impacts to be secured and any negative implications to be mitigated. This could	A draft policy has been prepared.	553	The Planning Bureau obo McCarthy Stone

APPENDIX A – POLICY AP6 (HEALTH IMPACT ASSESSMENTS)

<p>as well as increased happiness and life satisfaction of residents. Specifically designed housing for older people offers significant opportunities to enable residents to be as independent as possible in a safe and warm environment. Recommendation: For the plan to be in line with national policy and effective the following wording should be added the policy area to recognise the health benefits of older persons housing. <i>Specialist Housing for older people has a number of health benefits and proposals for such schemes will not be required to submit a Health Impact Assessment.</i></p>	<p>identify the health benefits of providing older people's housing.</p>			
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APPENDIX A – POLICY AP8 (SUSTAINABLE URBAN DRAINAGE SYSTEMS)

CHAPTER: 5	POLICY NUMBER: AP8	POLICY NAME: SUSTAINABLE URBAN DRAINAGE SYSTEMS
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MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
(1) All major development proposals will include Sustainable Drainage Systems (SuDS) for the management of surface water run-off unless it can be clearly demonstrated that: (a) SuDS are not technically, operationally or financially deliverable or viable and that surface water drainage issues from the development can be mitigated in an alternative way;				
This policy is essential. Concerned that part 1 includes financial and viability loopholes which could allow developers to avoid inclusion of a SUDS scheme where it is technically feasible and necessary. Remove the words “financially deliverable or viable”. If SUDS is needed and it is not financially deliverable or viable then planning permission should be refused.	The NPPF has been revised since the draft policy was published. The NPPF now requires any application that could affect drainage on or around a site to incorporate sustainable drainage systems, that are proportionate to the nature and scale of the proposal. As such it is considered that Part (1) of the draft policy is re-worded and that Parts (1)(a) and (1)(b) are deleted.	Part (1) of the policy be reworded to read “ All major development proposals will include Development proposals that could affect drainage on or around a site should incorporate Sustainable Drainage Systems (SuDS) for the management of surface water run-off consistent with the requirements of the National Planning Policy Framework, or its successor. Delete Parts (1)(a) and (1)(b) of the policy	92	Ashby de la Zouch Town Council
Supports the provision of SuDS in appropriate locations, where it is viable. The policy aligns with NPPF para. 175.	Noted. The NPPF has been revised since the draft policy was published. The NPPF now	See response above to representation 92.	185, 186	Marie Stacey obo Clowes, Marie Stacey

APPENDIX A – POLICY AP8 (SUSTAINABLE URBAN DRAINAGE SYSTEMS)

	requires any application that could affect drainage on or around a site to incorporate sustainable drainage systems, that are proportionate to the nature and scale of the proposal. As such it is considered that Part (1) of the draft policy is re-worded and that Parts (1)(a) and (1)(b) are deleted.			obo Wilson Bowden
The District's proposed approach to prioritising SUDs is noted. The flexibility built into the draft policy wording to take account of viability or site-specific environmental issues is welcomed and should form part of the final wording for this policy.	Noted. The NPPF has been revised since the draft policy was published. The NPPF now requires any application that could affect drainage on or around a site to incorporate sustainable drainage systems, that are proportionate to the nature and scale of the proposal. As such it is considered that Part (1) of the draft policy is re-worded and that Parts (1)(a) and (1)(b) are deleted.	See response above to representation 92.	214	Stantec obo Bloor Homes Midlands and Taylor Wimpey Strategic Land
Part (1) Should the word major be removed and read ALL development. Replacing permeable land with concrete means water will go elsewhere with the possible risk of flooding. Relevant particularly to current proposal on St Georges Hill, Swannington.	Noted. The NPPF has been revised since the draft policy was published. The NPPF now requires any application that could affect drainage on or around a site to incorporate sustainable drainage systems, that are proportionate to the nature and scale of the proposal. As such it is considered that Part	See response above to representation 92.	289	Swannington Parish Council

APPENDIX A – POLICY AP8 (SUSTAINABLE URBAN DRAINAGE SYSTEMS)

	(1) of the draft policy is re-worded and that Parts (1)(a) and (1)(b) are deleted.			
The policy needs to be wary of Developers subdividing a plot into separate “phases”, each with its own separate planning application, to circumnavigate the need for ponds and soakaways.	Noted. The provision of SuDS is usually secured through planning conditions which ensure the initial implementation of SuDS, and S106 agreements are used to secure their long-term management and maintenance.	No change.	175	Oakthorpe, Doninsthorpe and Acresford Parish Council
The Policy should set out a clear definition of major development.	Noted, as the NPPF has been revised since the draft policy was published, the changes the Part (1) of the policy detailed above include the proposed deletion of the word ‘major’.	See response above to representation 92.	175	Oakthorpe, Doninsthorpe and Acresford Parish Council
This policy is highly problematic as we know the developers backed up by Freeport and Dept of Levelling up sanction, can override local planners concerns or objections. This policy states if not financially deliverable surface water can be mitigated in an alternative way. This could allow a reduced level of mitigation. If that were to occur residents in Diseworth could face far greater flood risk due to these developments. We demand the policy is tightened up to “surface water drainage issues from the development MUST be mitigated in an alternative way”.	Noted, the NPPF has been revised since the draft policy was published and as such it is proposed that Part (1)(a) be deleted.	See response above to representation 92.	199	Louis Della-Porter obo Long Whatton & Diseworth Flood Working Group (FWG)

APPENDIX A – POLICY AP8 (SUSTAINABLE URBAN DRAINAGE SYSTEMS)

Paragraph 5.71 suggests that minor development is not required to use SuDS. All development must consider flood risk and water quality, and as such, SuDs should always be considered for development of any size. Suggest removing the word 'major' as it is relevant for all development including minor.	Noted, as the NPPF has been revised since the draft policy was published, the changes the Part (1) of the policy detailed above include the proposed deletion of the word 'major'.	See response above to representation 92.	341	Leicestershire County Council
Part 1a - The statement relating to not being financially deliverable makes SuDS sound more optional than it is. SuDS in the form of attenuation must be implemented in order to comply with Policy AP7. The wording should ensure that it is clear that cost constraints do not impact on the ability to meeting Policy AP7 and to provide adequate treatment to the run-off. It is unclear what NWLDC considers to be SuDS and this falls below the standards set by national policy and draft policy AP7. SuDS attenuation in the form of below ground tanks and treatment though mechanical means should still be implemented at a minimum.	Noted, the NPPF has been revised since the draft policy was published and as such it is proposed that Part (1)(a) be deleted.	See response above to representation 92.	341	Leicestershire County Council
(2) All schemes with the inclusion on SuDS should demonstrate that they have considered all four areas of good SuDS design; quantity, quality, amenity and biodiversity.				
Part 2 - Consider removing the words "with the inclusion of SuDS" in line with our recommendations against Part 1a.	Noted, the NPPF has been revised since the draft policy was published and as such it is proposed that Part (2) of the draft policy be deleted.	Delete Part (2) of the draft policy.	341	Leicestershire County Council

APPENDIX A – POLICY AP8 (SUSTAINABLE URBAN DRAINAGE SYSTEMS)

(3) Where appropriate, every effort should be made to link SuDS into wider initiatives to enhance green infrastructure, improve water quality and benefit wildlife and biodiversity.				
Natural England welcomes this policy. Agree that a multi-functional approach to SuDS should be encouraged and take opportunities to incorporate features that enhance and maintain biodiversity as part of a coherent green and blue infrastructure approach. GI has many benefits including contributing to sustainable drainage at local and catchment scales. Guidance on sustainable drainage systems, including the design criteria, can be found in the CIRIA SuDS Manual (2015) C753.	Noted, the NPPF has been revised since the draft policy was published and as such it is proposed that Part (3) be deleted. The NPPF (para. 182) requires SuDS to provide multifunctional benefits wherever possible, through facilitating improvements in water quality and biodiversity. As this requirement is set out in the NPPF it does not need to be repeated in local policy	No change.	223	Natural England
(4) Arrangements must be put in place for the management and maintenance of the SuDS over the whole period during which they are needed.				
Suggest that reference should be made to the need to ensure that such schemes are safe. RoSPA says, “SuDS can, if not well designed, present a significant risk to the children, residents and general public that will interact with them.”	There are National standards for sustainable drainage systems (July 2025) which require public safety measures to be included. SuDS and safety regulations in the UK, particularly England, are governed by the National Standards for Sustainable Drainage Systems (2025), the National Planning Policy Framework (NPPF), the Flood and Water Management Act 2010, and the Construction (Design and Management)	No change.	92	Ashby de la Zouch Town Council

APPENDIX A – POLICY AP8 (SUSTAINABLE URBAN DRAINAGE SYSTEMS)

	Regulations 2015 (CDM Regulations). These regulations establish a framework for the safe design, construction, and long-term management of SuDS.			
Based on recent experience, we strongly recommend that arrangements for the management and maintenance of the SUDS over the whole period are needed and should be contained in a S106 Agreement. The absence of proper management and/or maintenance can have serious repercussions for properties located in flood zones 2 and 3.	Noted. The provision of SuDS is usually secured through planning conditions which ensure the initial implementation of SuDS, and S106 agreements are used to secure their long-term management and maintenance.	No change.	213	Osgathorpe Parish Council
Would developers be legally bound to deliver safe flood risk mitigation, principally through SuDS, throughout the full life of their respective developments?	The provision of SuDS is usually secured through planning conditions which ensure the initial implementation of SuDS, and S106 agreements are used to secure their long-term management and maintenance.	No change.	199	Louis Della-Porter obo Long Whatton & Diseworth Flood Working Group (FWG)
Part 4 - Maintenance should include all drainage on-site that is not adopted by the third party (i.e. highway drainage or water company adopted drainage). This will also include existing drainage retained on-site such as ditches. Consider rewording to something along the lines of: <i>Arrangements must be put in place for the management and maintenance of</i>	Agree that the wording of the draft policy could be amended to reflect the suggested wording.	Additional criterion (c) to be added to part (2) of the draft policy: “Ensure arrangements are put in place for the management and maintenance of the proposed surface water drainage system over the whole period	341	Leicestershire County Council

APPENDIX A – POLICY AP8 (SUSTAINABLE URBAN DRAINAGE SYSTEMS)

<i>the proposed surface water drainage system and any retained existing surface water drainage features over the whole period during which they are needed.</i>		during which they are needed”.		
COMMENTS ON SUPPORTING PARAGRAPHS				
Paragraph 5.69 states “Leicestershire County Council is the Lead Local Flood Authority (LLFA) and is the lead organisation for providing advice and guidance on surface water runoff and run off rates”. This should be strengthened to include the need to seek pre-application advice from the LLFA.	Noted and agree that the supporting text should be strengthened to include the need for applicants to seek pre-application advice from the LLFA.	The supporting text will be amended to reflect the need for applicants to seek pre-application advice from the LLFA.	341	Leicestershire County Council
It appears that the report has not been updated to reference that latest version of NPPF (December 2023). All references throughout the report should be updated. For example, paragraphs 5.70 and 5.71 reference NPPF paragraph 167 however the correct paragraph is now paragraph 175.	Noted.	The supporting text will be updated to reflect the revisions to the NPPF.	341	Leicestershire County Council
Paragraph 5.74 is out of date. It is currently unclear if and when Schedule 3 will be implemented.	Noted.	The supporting text will be updated.	341	Leicestershire County Council

APPENDIX A – POLICY AP8 (SUSTAINABLE URBAN DRAINAGE SYSTEMS)

OTHER COMMENTS				
OVERLOADED DRAINAGE SYSTEMS				
Drainage systems are under massive pressure and cannot cope. There are impacts from surface water from “small” developments not installing ponds/soakaways but relying instead on the already overloaded sewage system. Local streams are polluted by run off from an overloaded water treatment plant - or other sewage related problem. Any new development should consider sustainable drainage, as appropriate, such that an already overburdened sewage system is not further compromised.	The NPPF makes clear that granting planning permission should not lead to increased flood risk elsewhere (paragraph 170). The inclusion of SuDS solutions will control and manage surface water run-off. Utilities companies have a statutory duty to provide water and sewage to all new developments. It is their responsibility to ensure that there is sufficient capacity in the system to accommodate new development, even if this involves having to undertake improvements to existing infrastructure. If there are capacity constraints, this may impact the timing of development rather than the principle of development.	No change.	175, 180, 565	Oakthorpe, Doninsthorpe and Acresford Parish Council, Ashby Woulds Town Council, Mark Payne
IMPACT ON DISEWORTH				
Diseworth suffers from repeated flooding due to land run-off from a large catchment area plus discharges from East Midland Airport holding ponds. This is already well documented with LCC Flood Management team. Any proposed development in the catchment area (not just the village	Noted. The NPPF makes clear that granting planning permission should not lead to increased flood risk elsewhere (paragraph 170). The inclusion of SuDS solutions will control and manage surface water run-off.	No change.	336	Kevin Walker

APPENDIX A – POLICY AP8 (SUSTAINABLE URBAN DRAINAGE SYSTEMS)

boundary) should help eliminate this risk by design.				
<p>Comments relate to the potential impact of the proposed development of land around Isley Walton [IW1] and south of the A453 [EMP90]. Long Whatton & Diseworth Flood Working Group (FWG) is a volunteer group of residents who work reduce the risk of flooding to homes in Diseworth. The two proposed developments either side of Diseworth are of such a large scale, and in terms of surface water management, precisely in the wrong location. Mitigation will reduce the risk, but would it be guaranteed to be reliable and cost effective over the long-term?</p> <p>We demand NWLDC planners commission independent baselines audits to ensure impacts are not underestimated. As a minimum, all water runoffs should be measured over a full yearly cycle both on site and directly in Diseworth. The granular detail specific to Diseworth needs to be accurately measured and evidenced over a full weather cycle. To comply with [Reg 18 5.61], the Local Plan should clearly set out a policy framework to assess, model and manage the cumulative effects of multiple large-scale developments as a</p>	<p>The NPPF makes clear that granting planning permission should not lead to increased flood risk elsewhere (paragraph 170). Managing the risk of flooding from surface water is the responsibility of Lead Local Flood Authorities. LCC (in its role as the LLFA) prepared the Diseworth and Long Whatton Catchment Study and subsequently the Long Whatton and Diseworth Flood Risk Mitigation and Resilience Study in response to flooding in Diseworth and Long Whatton. Additional criteria has been agreed to be added to Policy IW1 in relation to surface water run-off.</p>	No change.	199	Louis Della-Porter obo Long Whatton & Diseworth Flood Working Group (FWG)

APPENDIX A – POLICY AP8 (SUSTAINABLE URBAN DRAINAGE SYSTEMS)

whole for the small sensitive locale of Diseworth. We call for a single system level water catchment evaluation, in principle as defined by SCIMAP, from which any single or separate planning application has to be impact assessed against.				
GENERAL COMMENTS				
Comment relates to how CD10 will adhere to Policy AP8.	Noted.	No change.	183	Philip Ivory
The provision of SuDS is noted as a requirement within the proposed Local Plan allocation for Clowes' employment site at Land West at Hilltop Farm, Castle Donington through the proposed employment allocation site EMP89.	Noted.	No change.	185	Marie Stacey obo Clowes
As a part of the allocation requirements for Money Hill, SuDS will be delivered onsite within the wider scheme.	Noted	No change	214	Stantec obo Bloor Homes Midlands and Taylor Wimpey Strategic Land

APPENDIX A – POLICY AP9 (WATER EFFICIENCY)

CHAPTER: 5	POLICY NUMBER: AP9	POLICY NAME: WATER EFFICIENCY
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MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
Support Policy				
Support.	Noted.	No change.	92	Ashby de la Zouch Town Council
We welcome the inclusion of this section and are particularly supportive of the wording throughout. Fully support the strong and prescriptive nature of the Draft Policy.	Noted.	No change.	404	Environment Agency
Supports the Council's intention to strive for higher water efficiency standards given that the area is classified as one under serious water stress, and note that the development industry already works to high standards in this regard, including the newly introduced Environmental Improvement Plan. In that regard, the requirement for new residential developments to meet the optional water efficiency standard of 110 l/p/d is justified.	Noted.	No change.	187, 656	Sam Perkins Define Planning and Design obo Bloor Homes Ltd, Sam Parkins (Define Planning and Design) obo Rosconn Strategic Land

APPENDIX A – POLICY AP9 (WATER EFFICIENCY)

(1) All proposals for new residential development are required to achieve the national optional water efficiency standard of a maximum of 110 litres of water per person per day, this will be secured by a planning condition.				
There is also no evidence that the impact on viability has been tested. The policy's impact on viability will need to be tested and confirmed in order that it does not hinder the development of housing.	This policy is one to be tested through the forthcoming whole-plan viability assessment which will inform the Regulation 19 version of the plan. It is proposed that this policy is agreed at this stage subject to the findings of the whole-plan viability study.	No change.	147, 184, 193, 211, 216, 235	Gladman Developments, Clare Clarke Pegasus obo Hallam Land Management, Alan Siviter Pegasus Group obo Hallam Land Management, Clare Clarke Pegasus Group obo Davidsons Developments Limited, Harry Clayton Pegasus Group obo Westernrange Limited, Clare Clarke Pegasus Group obo Davidsons Developments Limited and Westernrange Limited

APPENDIX A – POLICY AP9 (WATER EFFICIENCY)

Building Regulations (Part G) require all new dwellings to achieve a 125 litres per day per person. The draft policy goes beyond the current national requirements and is therefore not supported. Water efficiency is most appropriately dealt with through Building Regulations. There is insufficient evidence provided to demonstrate a local need for a lower requirement.	<p>The Housing: optional technical standards guidance sets out how planning authorities can gather evidence to set optional requirements. One of the primary sources of evidence to support a tighter water efficiency standard for new dwellings is the Environment Agency water stressed areas 2021 classification. This identifies areas of serious water stress. NWL is identified as being within an area classed as 'seriously water stressed'. As such it is considered appropriate to seek to meet the optional tighter water efficiency standard. The Environment Agency are supportive of the policy and there has not been any objection to the policy from relevant stakeholders.</p> <p>Some minor wording changes are proposed to Part (1) of the policy for clarity.</p>	Amend Part (1) of the draft policy to read: All proposals for new residential development are required to achieve the As part of proposals for residential development applicants will be required to submit evidence to demonstrate that the national optional water efficiency standard of a maximum of 110 litres of water per person per day can be met . This will be secured by a planning condition.	184, 193, 211, 216, 235	Clare Clarke Pegasus obo Hallam Land Management, Alan Siviter Pegasus Group obo Hallam Land Management, Clare Clarke Pegasus Group obo Davidsons Developments Limited, Harry Clayton Pegasus Group obo Westernrange Limited, Clare Clarke Pegasus Group obo Davidsons Developments Limited and Westernrange Limited
The evidence provided is for the wider Severn Trent Water area and does not appear to be supported by consultation with key stakeholders such as Severn Trent Water or the Environment Agency. A clear local need should be established through interaction not solely with the Environment Agency but with local water			147, 184, 193, 211, 216, 235, 237	Gladman Development, Clare Clarke Pegasus obo Hallam Land Management, Alan Siviter Pegasus Group

APPENDIX A – POLICY AP9 (WATER EFFICIENCY)

and sewerage companies and catchment partnership. The Council's evidence does not demonstrate a clear local need in line with the requirements of the PPG.				obo Hallam Land Management, Clare Clarke Pegasus Group obo Davidsons Developments Limited, Harry Clayton Pegasus Group obo Westernrange Limited, Clare Clarke Pegasus Group obo Davidsons Developments Limited and Westernrange Limited, Home Builders Federation
It is noted and welcomed that NWLDC are not seeking to impose water efficiency standards over and above the national requirements. However, it is considered that some form of flexibility should be included within the policy wording to ensure that new residential developments are not restricted or limited on accounts of water efficiency where viability or site-specific constraints impact the ability to achieve this.	This policy requires residential development to demonstrate that the national optional tighter water efficiency standard of 110 litres of water per person be met. This policy is one to be tested through the forthcoming whole-plan viability assessment which will inform the Regulation 19 version of the plan. It is proposed that this policy is agreed at this stage subject to the findings of the whole-plan viability study.	No change.	214	Scarlett Lambeth Stantec obo Bloor Homes Midlands and Taylor Wimpey Strategic Land

APPENDIX A – POLICY AP9 (WATER EFFICIENCY)

<p>We are pleased to see that the optional standard of 110l/p/d for residential development has been recognised as being required for new residential dwellings in the district since the area has been classed as 'seriously water stressed'.</p>	<p>Noted.</p>	<p>No change.</p>	<p>404</p>	<p>Environment Agency</p>
<p>(2) All proposals for new non-residential buildings are required to demonstrate that BREEAM excellent credits for WAT 01 are being targeted and this will be secured by a planning condition. An assessment of the building's water efficiency performance should be carried out by a BREEAM approved assessor using the BREEAM Wat 01 calculator, or equivalent best practice standard, and should be submitted as part of a planning application.</p>				
<p>The proposed requirement to achieve BREEAM Excellent for the Water 01 (WAT01) would result in a number of small-scale applications having to undertake an assessment of water efficiency which would be over the top. The wording of the current application would catch applications such as equestrian uses, extensions to sports pavilions, small rural offices etc. The policy should only be applied over a specific threshold to ensure that it does not apply for smaller outbuildings that would not be able to achieve such a standard or should be a standard planning condition which wouldn't result in a significant burden on applicants and the LPA.</p>	<p>Noted and it is acknowledged that Part (2) of the policy could be burdensome for smaller developments. As such it is proposed that Part (2) of the draft policy be amended to refer to major non-residential development and a new Part (3) be added to the draft policy that sets out requirements for other development proposals captured by the planning process.</p>	<p>Amend Part (2) to read: (2) All Major non-residential proposals for new non-residential buildings are involving the extension, replacement or creation of new non-residential floorspace or a combination thereof will be required to demonstrate that BREEAM excellent credits for WAT 01...</p> <p>Add a new Part (3) to the policy to read: (4) For all other development proposals captured by the planning process</p>	<p>8, 187, 656</p>	<p>James Mattley, Sam Perkins Define Planning and Design obo Bloor Homes Ltd, Sam Parkins (Define Planning and Design) obo Rosconn Strategic Land</p>

APPENDIX A – POLICY AP9 (WATER EFFICIENCY)

		including, change of use, conversions, extensions and refurbishments, applicants will need to demonstrate that measures have been incorporated to achieve the highest level of water efficiency possible.		
Generally, support the provision of BREEAM excellent standards for Water Efficiency credits in alignment with WAT 01.	Noted.	No change.	185, 186	Marie Stacey Pegasus Group obo Clowes Developments (UK) Limited, Marie Stacey Pegasus Group obo Wilson Bowden Developments Ltd
It should be noted that at outline application stage for industrial and warehousing units, the units will not necessarily be pre-let and therefore the occupier will not be known. There will be instances where proposals will need to be flexible to react to the market, which	The draft Policy does not specify the stage of the planning application process where an assessment is required, this does allow some flexibility. It could, for example, be a condition of an outline	No change.	185, 186	Marie Stacey Pegasus Group obo Clowes Developments (UK) Limited, Marie Stacey Pegasus Group

APPENDIX A – POLICY AP9 (WATER EFFICIENCY)

will all have a bearing on the final specification of sanitaryware components and the calculations for the BREEAM WAT 01 calculator, or equivalent best practice standard. The assessment cannot therefore be submitted as part of a planning application and therefore should be required prior to occupation rather submitted as part of a planning application. The draft policy wording, in particular criterion (2), should be updated to take this into consideration.	permission that requires an BREEAM WAT01 assessment to be undertaken at a later stage of the application process.			obo Wilson Bowden Developments Ltd
Consider including BREEAM WAT02 to this requirement as this provides a credit for the installation of water butts which can reduce the amount of rainfall entering the surface water drainage system and potentially reducing flooding risk.	BREEAM WAT 01 is concerned with water consumption and encourages the reduction of water consumption by ensuring efficient design and specifying water efficient equipment. BREEAM WAT02 is concerned with water monitoring and encourages the effective management and monitoring of water consumption by providing clear data on water use. Policy AP9 addresses water efficiency and as such WAT 01 is considered the most appropriate measure	No change.	341	Leicestershire County Council
Is the use of BREEAM Wat 01 Calculator approved assessors providing another opportunity for	Noted and it is acknowledged that Part (2) of the policy could be burdensome for smaller developments. As detailed	See proposed wording changes above to Part (2) and the proposed	396	Siobhan Dillon

APPENDIX A – POLICY AP9 (WATER EFFICIENCY)

scams/bribes/squeezing the small developers?	above it is proposed that Part (2) of the draft policy be amended to refer to major non-residential development and a new Part (3) be added to the draft policy that sets out requirements for other development proposals captured by the planning process.	new Part (3) of the draft policy.		
Pleased to see that water efficiency in non-residential development will be required to demonstrate that Excellent BREEAM credits for WAT 01 are being targeted.	Noted.	No change.	404	Environment Agency
COMMENTS ON SUPPORTING PARAGRAPHS				
5.79 – Looking at the report, it seems a huge amount of the country is within the high water stressed category. This seems a ‘broad brush’ categorisation. Does Severn Trent provide a clearer understanding about how NWLDC is water stressed? Is this due to infrastructure failure, too much development or rainfall issues? Should we be looking to understand the true reasons for the high water stress? Or even if the category is appropriate to NWLDC.	The Environment Agency (EA) establishes areas of serious water stress. This designation is made based on the EA’s assessment of current and future water usage, including climate change scenarios. The Environment Agency provides recommendations, and the Secretary of State ultimately makes the final decision on which areas are classified as experiencing serious water stress. The classification is particularly relevant for water companies who produce water resource management plans.	No change.	396	Siobhan Dillon

APPENDIX A – POLICY AP9 (WATER EFFICIENCY)

<p>The supporting commentary could be strengthened to illustrate benefits beyond the individual household level, for example:</p> <ul style="list-style-type: none"> • Water efficiency measures will contribute to a reduction in the per customer carbon footprint of the water industry which are incurred through the abstraction, treatment, and conveyance of clean and wastewater. • Water efficiency measures will help ensure sustainable management of existing water network infrastructure by relieving capacity stresses. <p>Also, consideration should be given for any future version of the report to state that water efficiency measures are required to reduce the associated impact of a growing population accessing an already stressed resource.</p>	<p>Noted and agree that the supporting text could identify the benefits of water efficiency measures.</p>	<p>The supporting text will be amended to include reference to the benefits of water efficiency measures.</p>	<p>404</p>	<p>Environment Agency</p>
<p>GENERAL COMMENTS</p>				
<p>It is considered that the measures relating to water efficiency could be included within a wider Climate Change policy.</p>	<p>The Local Plan includes policies concerned with mitigating the impacts of climate change, these include draft Policy AP3 (renewable energy), AP4 (reducing carbon emissions) as well as AP7, AP8 and AP9. These would be applied when determining planning applications and as such it is considered that climate change is adequately address in the</p>	<p>No change.</p>	<p>341</p>	<p>Leicestershire County Council</p>

APPENDIX A – POLICY AP9 (WATER EFFICIENCY)

	draft Local Plan. A separate policy on water efficiency is considered the appropriate approach.			
Draft Policy AP9 is unnecessary because it duplicates national requirements.	Policy AP9 is considered necessary as it sets the local requirements for water efficiency.	No change.	161	Jenny Adams Mather Jamie obo The Trustees of Lord Crawshaw 1997 Discretionary Settlement (the Whatton Estate)