# Regulation 22 Statement of Consultation

LEICESTER LOCAL PLAN 2020-2036

Leicester City Council | January 2024

# Contents

1.	Introduction	3
I	Purpose	3
I	Background	3
0	Structure of the Consultation Statement	4
2.	Plan Production Timeline	6
I	Key Local Plan Stages Undertaken	6
3.	Main Issues Raised Pursuant to Regulation 19/20	8
4.	Statement Summary	12
Bib	bliography	13
Ap	ppendix 1 – Issues and Options (Optional Consultation)	14
Ap	opendix 2 – Emerging Options (Optional Consultation)	16
Ap	ppendix 3 – Regulation 18 Consultation	17
0	Schedule 1 – Bodies and Persons Invited to Make RepreSEntations	19
	Schedule 2 – Summary of the Key Changes to the New Leicester Local Plan between Regulati and Regulation 19	
Ap	ppendix 4 – Submission (Regulation 19 Publication) Plan Consultation	33
	opendix 4 – Submission (Regulation 19 Publication) Plan Consultation Schedule 1 – Details of the consultation undertaken	
		35
	Schedule 1 – Details of the consultation undertaken	35 35
	Schedule 1 – Details of the consultation undertaken A – Those notified of the Regulation 19 Consultation	35 35 40 20
	<ul> <li>Schedule 1 – Details of the consultation undertaken</li> <li>A – Those notified of the Regulation 19 Consultation</li> <li>B – Notification Materials</li> <li>Schedule 2 – Summary of the Main Issues Raised by Representations Persuant to Regulation</li> </ul>	35 35 40 20 41
	<ul> <li>Schedule 1 – Details of the consultation undertaken</li> <li>A – Those notified of the Regulation 19 Consultation</li> <li>B – Notification Materials</li> <li>Schedule 2 – Summary of the Main Issues Raised by Representations Persuant to Regulation and Council Response</li> </ul>	35 35 40 20 41 41
	<ul> <li>Schedule 1 – Details of the consultation undertaken</li> <li>A – Those notified of the Regulation 19 Consultation</li> <li>B – Notification Materials</li> <li>Schedule 2 – Summary of the Main Issues Raised by Representations Persuant to Regulation and Council Response</li> <li>Duty to Cooperate.</li> </ul>	35 35 40 20 41 41 44
	<ul> <li>Schedule 1 – Details of the consultation undertaken</li> <li>A – Those notified of the Regulation 19 Consultation</li> <li>B – Notification Materials</li> <li>Schedule 2 – Summary of the Main Issues Raised by Representations Persuant to Regulation and Council Response</li> <li>Duty to Cooperate.</li> <li>Comments on Consultation Process</li> </ul>	35 35 40 20 41 41 44 65
	<ul> <li>Schedule 1 – Details of the consultation undertaken</li> <li>A – Those notified of the Regulation 19 Consultation</li> <li>B – Notification Materials</li> <li>Schedule 2 – Summary of the Main Issues Raised by Representations Persuant to Regulation and Council Response</li> <li>Duty to Cooperate.</li> <li>Comments on Consultation Process</li> <li>Introduction, Spatial Portrait &amp; Vision</li> </ul>	35 35 40 20 41 41 65 71
	<ul> <li>Schedule 1 – Details of the consultation undertaken</li> <li>A – Those notified of the Regulation 19 Consultation</li> <li>B – Notification Materials</li> <li>Schedule 2 – Summary of the Main Issues Raised by Representations Persuant to Regulation and Council Response</li> <li>Duty to Cooperate</li> <li>Comments on Consultation Process</li> <li>Introduction, Spatial Portrait &amp; Vision</li> <li>Chapter 4 – Strategy for Leicester</li> </ul>	35 35 40 20 41 41 65 71 81
	<ul> <li>Schedule 1 – Details of the consultation undertaken</li> <li>A – Those notified of the Regulation 19 Consultation</li> <li>B – Notification Materials</li> <li>Schedule 2 – Summary of the Main Issues Raised by Representations Persuant to Regulation and Council Response</li> <li>Duty to Cooperate.</li> <li>Comments on Consultation Process</li> <li>Introduction, Spatial Portrait &amp; Vision</li> <li>Chapter 4 – Strategy for Leicester</li> <li>Strategic site Allocations (Policies SL02-SL06)</li> </ul>	35 35 40 20 41 41 65 71 81 241
	<ul> <li>Schedule 1 – Details of the consultation undertaken</li></ul>	35 40 20 41 41 44 65 71 81 241 255

Chapter 9 – Central Development Area	. 273
Chapter 10 – Heritage	. 284
Chapter 11 – Culture and Tourism	. 286
Chapter 12 – Employment	. 291
Chapter 13 – Town Centre and Retail	. 299
Chapter 14 – Open Space, Sports and Recreation	. 303
Chapter 15 – The Natural Environment	. 308
Chapter 16 – Transportation	. 318
Chapter 17 – Future Minerals and Waste Needs	. 331
Chapter 18 – Development and Infrastructure	. 332
Chapter 19 - Neighbourhood Planning	. 337
Chapter 21 – Monitoring	. 338
Miscellaneous & Appendices	. 339
Evidence Base, Supporting Documents & Policies Map	. 343
Non-strategic site allocations	. 351

# 1. Introduction

# PURPOSE

- 1.1. This Statement of Consultation sets out how the Council has involved residents and key stakeholders in preparing the Leicester Local Plan 2020 to 2036 in accordance with Regulations 18 and 19 of the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 1.2. This statement meets Regulation 22 (1)(c) and demonstrates that consultation on the preparation of the Local Plan has been undertaken in accordance with the relevant regulations and the adopted Statement of Community Involvement [SCI] (2019) and temporary addendum (2020).
- 1.3. The SCI document sets out how the Council will consult and involve public and statutory consultees on planning policy documents.
- 1.4. The Statement of Community Involvement Temporary Addendum (2020) was created in light of the COVID-19 pandemic.
- 1.5. The Council has prepared a separate Duty to Cooperate Statement of Compliance (November 2022).
- 1.6. Links to documents referenced within the Statement of Consultation can be found in the bibliography.
- 1.7. The Statement of Consultation sets out:
  - i. Which organisations, stakeholders, and persons the local planning authority invited to make representations under Regulation 18
  - ii. How they were invited to make their representations
  - iii. A summary of the main issues raised.
  - iv. How those issues have been taken into account
  - v. If representations were made pursuant to Regulation 20, the number made and a summary of the key issues.

# BACKGROUND

1.8. This consultation statement describes how the Council has undertaken community participation and stakeholder involvement in the production of its Local Plan. It explains the different stages of plan preparation that Leicester City Council undertook, the main issues raised, and how representations have shaped the plan.

- 1.9. The city council began preparing a new Local Plan in 2014. The plan provides a strategy to accommodate growth in the city up to 2036. The plan is a strategic framework with the purpose of providing the overall strategic and spatial vision for the future of the Leicester Urban Area. It establishes policies and guidance to ensure local development is built in accordance with the principles set out in the National Planning Policy Framework [NPPF].
- 1.10. The Local Plan once adopted, will replace the Leicester Core Strategy (July 2014) and the saved policies from the City of Leicester Local Plan (January 2006).
- 1.11. The city council's proposed Local Plan 2020 to 2036 Submission (Regulation 19) Plan and supporting documents, including the Sustainability Appraisal [SA], were published in accordance with Regulation 19 for a six-week consultation period between 16<sup>th</sup> January and 27<sup>th</sup> February 2023. The Council consulted a wide variety of stakeholders, statutory bodies, local amenity and residents' groups, businesses, and residents. A variety of consultation methods were used in accordance with the approved Statement of Community Involvement.

# STRUCTURE OF THE CONSULTATION STATEMENT

- 1.12. <u>Section 1</u> Introduction
- 1.13. <u>Section 2</u> sets out the timeline which has been followed in preparing the Local Plan which is in accordance with the up-to-date Local Development Scheme [LDS] 2022 to 2025 (October 2022).
- 1.14. <u>Section 3</u> summarises the main issues raised during the course of the consultation carried out under Regulations 18 and 19 and how the comments received have been considered by the Council. Section 3 is supported by the four Appendices:
  - <u>Appendix 1</u> summarises the main issues raised during the Issues and Options Consultation (2014).
  - <u>Appendix 2</u> summarises the main issues raised during the Emerging Options Consultation (2017).
  - <u>Appendix 3</u> sets out the requirements of Regulation 22 (1)(c) (i) to (iv). Namely:
    - Which bodies and persons the local planning authority invited to make representations under Regulation 18;
    - How these bodies and persons were invited to make representations under Regulation 18;
    - A summary of the main issues raised by the representations made pursuant to Regulation 18; and
    - How any representations made pursuant to Regulation 18 have been taken into account.
  - <u>Appendix 4</u> sets out:

- How the Regulation 19 Local Plan consultation was undertaken, and the number of representations made; and
- A summary of the main issues (Regulation 22 (1)(c) (v)) and the city council response

# 2. Plan Production Timeline

- 2.1. In order to ensure thorough engagement will all stakeholders including the local community, businesses, and organisations, the Local Plan has been the subject of four consultation stages. The aim of these consultations has been to inform the preparation of a comprehensive plan, tailored to the needs of the city.
- 2.2. The following consultations have been held:
  - Issues and Options (Optional Consultation) October 2014 to January 2015
  - Emerging Options (Optional Consultation) July 2017 to December 2017
  - Draft Plan (Regulation 18) Consultation September 2020 to December 2020
  - Pre-Submission Plan (Regulation 19 Consultation) January 2023 to February 2023.
- 2.3. All consultations have been undertaken in accordance with the approved statement of Community Involvement [SCI]. Note, the first two consultations were undertaken in line with the SCI (2014) with the final consultations undertaken in line with both the SCI (2019) and SCI temporary addendum (2020).
- 2.4. This timeline is in accordance with the up-to-date LDS (2022).
- 2.5. The timetable below outlines the key stages in the preparation of the Submission Leicester City Local Plan in more detail:

# KEY LOCAL PLAN STAGES UNDERTAKEN

# 1. Issues and Options Consultation – October 2014

Following preparatory work during 2013 and 2014, a resolution to undertake the production of a new local plan was taken by Full Council on 4 February 2014, along with agreement to commence an initial round of public consultation on the issues and options for the new local plan. The consultation took place over 16 weeks between 15 October 2014 and 31 January 2015 (See further information in <u>Appendix 1</u>).

# 2. Emerging Options Consultation – July 2017

Taking account of the responses to the Issues and Options consultation in 2014, a decision was taken by Full Council on 6 July 2017 to consult on an Emerging Options document which comprised a draft list of development management policies and potential development sites. The consultation lasted for 21 weeks from 26 July 2017 until 17 December 2017 (See further information in <u>Appendix 2</u>).

# 3. Regulation 18 Consultation – September 2020

Taking into account the responses from the Emerging Options consultation, a decision was taken by Full Council on 19 February 2020 to consult on a draft Local Plan, policies map, and evidence base. The consultation lasted for 12 weeks from 14 September until 6 December 2020 in compliance with Regulation 18 of the Town and Country Planning (Local Plans) (England) Regulations 2012 (See further information in <u>Appendix 3</u>).

#### 4. Plan Amendments – January 2021 to October 2022

The Council made changes to the draft plan to address representations received during the consultation on the New Leicester Local Plan 2020-2036 at Regulation 18; changes in the Sustainability Appraisal; changes in National Planning Policy and guidance and general factual updates (see more detail in <u>Appendix 3 – Schedule 2</u>). The Sustainability Appraisal and evidence base documents were updated, a consultation report was produced and statements of common ground with neighbouring Planning Authorities were drafted to support the publication of the Submission (Regulation 19) Plan.

#### 5. Pre-Submission Plan (Regulation 19) Consultation – January 2023

Following a resolution by Full Council on 24 November 2022 the Submission (Regulation 19) Local Plan and policies map were consulted on over a 6-week period from 16 January until 27 February 2023. Supporting documents were also published during this time, including previous consultation documents, an updated Sustainability Appraisal, full evidence base, and Statements of Common Ground [SoCG]. In accordance with Regulation 19 of the Town and Country Planning (Local Plans) (England) Regulations 2012, representations were invited specifically on the plan's legal compliance and soundness for examination (see further information in <u>Appendix 4</u>).

#### 6. Submission to the Secretary of State – September 2023

The decision of Full Council in November 2022 also included a resolution to submit the Local Plan to the Secretary of State for examination following consultation. This Consultation Statement sets out the Council's consideration of the representations received under Regulation 20 in response to Regulation 19 publication (<u>Appendix 4 – Schedule 2</u>).

# N.B. submitted representations include those which have been received post consultation deadline which include a number of petitions.

#### 7. Examination – Spring/Summer 2024

The plan will be examined by an independent Planning Inspector(s) on behalf of the Secretary of State for Levelling Up, Housing and Communities.

# 3. Main Issues Raised Pursuant to Regulation 19/20

3.1. This section sets out the main issues raised during the Regulation 19 consultation on a chapter-by-chapter basis. Further detail on the processes undertaken is provided in the Appendices.

# Chapter 1 – Introduction

Concern over the use of the term "Leicester Urban Area." Details should be consistent on all diagrams. Support for the Statement of Common Ground.

# Chapter 2 – A Profile of Leicester: A Spatial Portrait

More reference to older persons housing. Data sources not well cited and/or outdated. Prefer a series of scenarios for population forecasts. Concerns of overcrowding. Should include wider acknowledgement of the links between climate change and open greenspace with health and wellbeing.

# Chapter 3 – Vision for Leicester

Vison does not satisfactorily set out aspirations for the natural environment or climate change. There should be a specific objective that reflects the role of Leicester City within the wider Housing Market Area (HMA)/Strategic Growth Plan. Additional objective needed to promote brownfield land. Difficult to gain clear view of what the key priorities are in the plan. The 'Vision' itself doesn't refer to climate change. Policy VL01 is a repeat of National Policy.

# Chapter 4 – Strategy for Leicester

Support for prioritisation of brownfield development in the Central Development Area [CDA], higher densities, and efficient land use. Calls to extend the plan period. Need to refer to the cumulative and cross-boundary transport impacts on the north-western part of the city. The Strategic Growth Plan is out of date and doesn't relate to climate change or biodiversity. Plan overestimates housing need and underestimates supply.

The Plan doesn't take into account home working as a result of COVID-19 pandemic. Planned development is concentrated in the north-west of Leicester. Lack of priority for the provision of housing for the elderly. Update neighbouring housing figures to accommodate extended plan period and employment figures. Reliance on CDA leads to significant risk of under delivery. Fails to demonstrate how the housing target will be delivered over plan period.

Objections received regarding strategic sites (See site allocations paragraph below).

# Chapter 5 – Housing

Whether the Council has sufficient evidence to justify the inclusion of the policies in relation to internal space standards. Housing for older people and people with disabilities and affordable housing. More emphasis should be placed on brownfield sites. Plan fails to consider impact on green sites.

#### Chapter 6 – Climate Change and Flood Risk

Incomplete justification and lack of evaluation for policies and their intended outcomes regarding climate change mitigation. Plan does not contain measurable or clear climate targets. No evident analysis of the actions or policies in the plan to demonstrate that the overall plan will contribute to the mitigation of climate change. Emphasis directed towards energy use and heating/cooling buildings. Flood risk should be considered separately.

Could be strengthened with nature-based solutions for climate change adaptation including green roofs and walls, street trees, and wetlands. Little reference to retrofitting of measures to address carbon emissions from buildings. Include wording within the policy around the provision of electric vehicle charging infrastructure on new developments.

#### Chapter 7 – Health & Wellbeing

Plan would result in worsened air quality, and council should outline plan to mitigate risk to public health from poor air quality. Could be expanded to include Health Impact Assessments being shared with the Public Health team for that particular authority.

#### Chapter 8 – Delivering Quality Design

Building for a Healthy Lifestyle should remain voluntary. Tall buildings should be directed to tall buildings zones. Circumstances should be outlined where tall buildings are permitted in other areas. Reference to a tall development Supplementary Planning Document [SPD] should be omitted until further refined. Policy should refer to the need for a cohesive approach to providing new route networks within developments that cross boundaries. Policy should identify circumstances where tall buildings can be supported outside tall building zones. Recommend policy to include detail of surface water outfall from site / drainage hierarchy at layout stage.

#### Chapter 9 – Central Development Area

Focus on the CDA is welcomed. Justification and implementation should follow each policy. Further explanation is required regarding the "Agent of Change" principle. Minor policy changes also recommended. No CPO justification in main body. Rainwater harvesting, sustainable development, and minimisation of potable water consumption recommended in office space development. Reference to positive impact on health and wellbeing of cultural activity and providing creative workspace opportunities in empty properties could be included.

#### *Chapter 10 – Heritage*

Concerned that the Local Plan remains silent on problems in Leicester's garment factories. The Stoneygate Character Appraisal's description of the Conservation Area is based on `townscape' rather than `streetscape' and does not make the shared qualities of the houses in streets like Southernhay Road (which were built at roughly the same time) sufficiently clear.

#### Chapter 11 – Culture & Tourism

Further efforts to retain and protect community facilities should be made. Policy should be added which protects cultural and other community facilities from being lost in line with NPPF para 93. Suggestion that text is amended to include reference to electric vehicles and provide access for those who need a private vehicle where sustainable modes of transport can't be met.

#### Chapter 12 - Employment

Policy doesn't reflect shift to home working and other post-COVID-19 pandemic effects on working lifestyles. Should reference reuse of derelict land for economic growth and employment purposes. Important to include that effective transport connectivity and accessibility is provided. Should make overt reference to encouraging skills retention, as identified within the Strategic Growth Plan.

#### Chapter 13 – Town Centre & Retail

Concerns about Plan's lack of policy regarding vacant units. Wording should be more precise when mentioning use classes and defining centres.

#### Chapter 14 – Open Space, Sports & Recreation

Comments regarding Green Wedge allocation. It is suggested that the Local Nature Recovery Strategy [LNRS] is referenced and explained in this chapter. Supporting evidence is of considerable age. The criteria for allowing development of open space do not currently take climate change into account. Wording suggested to be added to policy to support delivery of flood alleviation within green spaces.

#### Chapter 15 – The Natural Environment

Local Nature Recovery Strategy should be referenced. Lack of reference to ecology networks which have also not been mapped. Clarity on Biodiversity Net Gain required. Several minor revisions to supporting text. There is no explanation of the process of removing the status of biodiversity site. References should be made to: 1) LNRS are a flagship measure. 2) Leicestershire will appoint a responsible authority to lead and produce an LNRS. 3) Local Nature Recovery Strategy. Policy provides a loophole for the destruction of what are acknowledged to be 'irreplaceable habitats.'

#### Chapter 16 – Transportation

Issues over Workplace Parking Levy. Lack of clarity about funding sources and delivery timescales. More reference to neighbouring context should be added (specific regard to wider Housing Market Area [HMA], north of Leicester, and neighbouring transport authorities). Climate change and air quality should be listed as separate matters, climate change must be an overriding priority of the plan. No clarity over sources of funding or timescales for delivery. Objectives seek to cater for growth rather than demonstrating mitigation. Text should include cross-boundary growth impacts in the North of Leicester area, work that has taken place to

date (including as part of Charnwood Local Plan) and will be required in future to develop a transport strategy for the area. Criterion relating to the role of the City of Leicester within the wider HMA / Strategic Growth Plan should be added. Suggest that the city's proposed parking aims, objectives and policies should be considered in conjunction with those of the County and neighbouring district Councils.

### Chapter 17 – Future Minerals & Waste Needs

Text should be updated to reflect the latest government position on fracking.

#### Chapter 18 – Development & Infrastructure

Concerns over provision of education needs. Plan needs to be more robust in identifying location and partnerships for infrastructure provision. The city cannot meet the forecasted provision of land for educational need across the plan period. Concern about the emphasis given to the provision of new highway infrastructure, especially new road capacity. Include references / contributions towards the North of Leicester Transport Strategy and SE Leicester Transport study.

#### Chapter 19 – Neighbourhood Planning

-No Comments-

#### Chapter 20 – Planning Enforcement

-No Comments-

#### Chapter 21 – Monitoring

Recommend the inclusion of a trigger policy for the review of the Local Plan.

#### Miscellaneous & Appendices

Comments raised regarding consultation process. Issues relating to Statement of Common Ground. Appendix 1 requires more detail. Not clear how the historic environment has been fully considered in relation to sites in Appendix 6. Does not take into account the 2016 Thurcaston and Cropston Parish Plan. Plan should make greater reference to COVID-19 pandemic and aftereffects.

# Evidence Base, Supporting Documents & Policies Map

Supporting evidence and documents – useful to have these embedded in the Local Plan for ease of the reader to find them. Advised that it would be beneficial to make reference to Leicester's Care, Health, and Wellbeing Strategy 2022-2027.

Maps could be expected to provide indication of more active intervention in the interest of transparency, e.g., where building lines may be changed significantly and/or land safeguarded to carry out comprehensive master planning or provide new highways.

Sustainability Appraisal does not mention climate emergency, nothing to show how development can help reduce climate change.

Monitoring Framework should be considered alongside the SA monitoring indicators and should include baseline, targets, output indicators, source of relevant documentation, and parties leading on actions.

Green Wedge Review is no longer of a relevant date.

# Site Allocations

A wide range of issues raised, including site specific matters typically dealt with through the development management process; supporting evidence; conformity with neighbourhood plans; and site promotors / objectors suggesting alternative site capacities.

N.B. Within Appendix 4 Schedule 2, comments received regarding the strategic site allocations and council responses are found under Chapter 4 – Strategy for Leicester under the relevant Policies. Comments and responses regarding the non-strategic site allocations are found at the end of the schedule.

# 4. Statement Summary

- 4.1. Section 3 and <u>Appendix 3</u> (including <u>Schedule 1</u>) explain which bodies and persons the local planning authority invited to make representations under Regulation 18 and how they were invited to make representations, having regard to plan-making regulations and the Council's SCI (2019) and temporary addendum (2020). Summaries and full reports of the main issues raised by the representations are provided and include an explanation of how these were taken into account in the preparation of the Submission (Regulation 19) Local Plan. A summary is provided in <u>Appendix 3 Schedule 2</u>. The Council has therefore met the requirements of Regulation 22(1)(c) (i) to (iv).
- 4.2. Section 3 and <u>Appendix 4</u> (including <u>Schedule 1</u>) explain which bodies and persons were invited to make representations under Regulation 19 and how in accordance with the plan-making regulations and the Council's SCI (2019) and temporary addendum (2020). <u>Schedule 2</u> sets out the number of representations made pursuant to Regulation 20 and a summary of the main issues raised in those representations. The Council has therefore met the requirements of Regulations 22(1)(c) (v).

# **Bibliography**

- <u>City of Leicester Local Plan Saved Policies Version (2006)</u>
- Full Council Decisions:
  - o Council Thursday, 6 July 2017 5:00 pm
  - <u>Special Meeting to Consider the Draft Local Plan, Council -</u> <u>Wednesday, 19 February 2020 6:00 pm</u>
  - <u>Council Thursday, 24 November 2022 5:00 pm</u>
- Leicester City Core Strategy (2014)
- Leicester Local Plan 2020 to 2036 Submission (Regulation 19 publication)
   Plan (2023)
- Local Development Scheme 2022 to 2025 (2022) [LDS]
- <u>Statement of Community Involvement (2019)</u> [SCI]
- <u>Statement of Community Involvement Temporary Addendum (2020)</u> [SCI Addendum]
- <u>Statement of Compliance with the Duty to Cooperate (2022)</u>
- Sustainability appraisal of the Reg. 19 Leicester Local Plan (2022) [SA]

# Appendix 1 – Issues and Options (Optional Consultation) OCTOBER 2014 TO JANUARY 2015

- The initial step in the preparation of the new plan is to identify what the scope and content of the plan should be. The first consultation was carried out to help understand and engage with interested parties about the future of the city, the scope of the plan and what matters it should cover.
- To facilitate consultation, Leicester City Council produced the <u>Issues and Options Document</u>. This briefly stated the intention of a Local Plan. The consultation posed a series of questions and themes across a number of areas to prompt and aid discussion. Interested parties were invited to consider these between 15 October 2014 and 31 January 2015.

#### How was the Consultation Undertaken?

- In accordance with government regulations the document was available to view on the council's website during the full length of the consultation period. An online questionnaire was also available to complete and submit electronically. In addition, an email and postal contact address were provided for comments to be sent directly to the city council. Members of the public also had the opportunity to inspect the Issues and Options document at council offices and in libraries across the city.
- Bodies/persons invited to make representations as part of this consultation included specific and general consultation bodies that are prescribed by legislation. Local councillors and members of parliament were also invited to make representations. All bodies/persons were notified by email or letter.

#### Main Issues Raised through the Consultation

A total of 93 responses were received. The findings of the public consultation (July 2015) summarise the responses received. Further details are provided in Appendix 1 of this statement.

The consultation had 12 themes. The main issues raised were:

- Need to meet housing targets and to respond to employment pressures.
- Need more business space in existing residential areas and neighbourhoods.
- Need to provide the right mix of housing in the city including affordable housing.
- Prioritise development and delivery on brownfield sites.
- Need to retain quality open space and develop poor quality green space.
- More leisure uses for young people.
- Creation of community and sports hubs where multi-purpose facilities can be provided.

- How do we ensure that all new developments incorporate Sustainable Drainage Systems.
- Improve public transport and provide better quality and continuous walking/cycling routes that are clear and attractive.
- Preserve the city's heritage, but not compromise growth within the city.

A summary of the main issues raised through this consultation and can be viewed here

# Appendix 2 – Emerging Options (Optional Consultation) JULY 2017 TO DECEMBER 2017

The Emerging Options consultation was undertaken in accordance with the Council's Statement of Community Involvement (2014) and sought the views and opinion of the public and other consultees on the following four documents: The Emerging Options Document, the Development Management Policies document, the Potential Development Sites and the Sustainability Appraisal.

#### How was the Consultation Undertaken?

- In accordance with government regulations the documents were available to view online on the Council's website during the full length of the consultation period. An online questionnaire was also made available to complete and submit electronically. In addition, an email contact address and postal address was provided for comments to be sent directly to the Council. Members of the public had the opportunity to inspect the documents at council offices and in libraries across the city. The council also publicised the consultation through the local media.
- An exhibition was staffed at Highcross Shopping Centre for a total of 8 days. This involved a display stand, leaflets, plans of the city, and post it notes to encourage comments. Presentations and subsequent discussions also took place at local ward meetings, and further workshops and presentations were held for stakeholders, organisations, and community groups.

#### Main Issues Raised through the Consultation

Overall, there were approximately 1,300 comments on the plan during this stage of consultation. These include responses from MPs, Councillors, adjoining Councils, government departments, members of the public, organisations, businesses, and community groups. The <u>Summary of Responses (2017)</u> summarises the responses received and sets out the council's response to comments.

# Appendix 3 – Regulation 18 Consultation

# SEPTEMBER TO DECEMBER 2020

This appendix addresses the requirements of Regulation 22(1)(c) (i) to (iv) and sets out:

- (i) Which bodies and persons the local planning authority invited to make representations under Regulation 18
- (ii) How those bodies and persons were invited to make representations under Regulation 18
- (iii) A summary of the main issues raised by the representations made pursuant to Regulation 18
- (iv) How any representations made pursuant to Regulation 18 have been taken into account.

# 1 Introduction

- Public consultation under Regulation 18 of the Town and Country Planning (Local Plans) (England) Regulations 2012 involved consultation on a full Draft Leicester Local Plan and took place over 12 weeks from 14 September to 7 December 2020. Consultation had been due to commence on the 23 March 2020, however, due to the COVID-19 pandemic and subsequent lockdown, it was decided to postpone the consultation by 6 months. Approximately 3,500 representations were made on the draft Local Plan at this stage of consultation.
- Section 2 of this Appendix, along with Schedule 1, sets out which bodies and person were consulted and how that was undertaken.
- Section 3 of this Appendix provides links to the reports that summarised the main issues raised in response to the consultation and the response of the Council indicating how the comments were taken into account in the next stage of plan preparation.

Section 4 sets out a conclusion of the Regulation 18 consultation process.

#### 2 Who was consulted under Regulation 18 and how this was undertaken

The Draft Leicester Local Plan was published alongside other supporting documents, such as the Sustainability Appraisal and the evidence base. In accordance with government regulations the document was available to view on the council's website during the full length of the consultation period. An online questionnaire was also available to complete and submit electronically. In addition, an email contact address and postal address was provided for comments to be sent directly to the council. Members of the public had the opportunity to inspect all the documents at council offices and in libraries across the city.

- In accordance with the Council's adopted <u>Statement of Community Involvement (2019)</u> and <u>temporary addendum (2020)</u>, a wide range of methods were used to publicise the consultation. Emails were sent to organisations and individuals on Leicester's planning policy consultation database at the start of consultation. This database includes statutory, specific and general consultation bodies required under the 2012 plan-making Regulations. See Schedule 1 of this Appendix for the list of those contacted. Articles publicising the consultation were placed in the Leicester Mercury and on the council's website. Leaflets were also sent to every household and business in and around Leicester to inform members of the public that the consultation had commenced, and how they could respond. Site notices were put around proposed site allocations and letters sent to adjacent properties. Social media posts were made on Facebook and Twitter and a YouTube video was also published.
- In accordance with government regulations the document was available to view on the council's website during the full length of the consultation period. An online questionnaire was also available to complete and submit electronically. An email contact address as well as a postal address was provided for comments to be sent directly to the council. Members of the public had the opportunity to inspect the Draft Local Plan and supporting documents at council offices and in libraries across the city.

Schedule 1 of this Appendix provides a list of who was contacted.

#### 3 Main Issues raised in Plan order including the Council response/action.

A <u>Summary of responses to Regulation 18 Consultation (2020)</u> gives a summary of the responses received during the Regulation 18 consultation in Plan order organised section by section, as well as the number of representations received on each section broken down by statutory consultee, organisation and individual. A summary of the key changes to the Local Plan made between Regulation 18 consultation and Regulation 19 is provided in Schedule 2 of this Appendix.

#### 4 Conclusion

The summary above explains which bodies and persons the local planning authority invited to make representations under Regulation 18 and how they were invited to make representations, having regard to the Council's adopted <u>Statement of Community</u> <u>Involvement (2019)</u> and <u>temporary addendum (2020)</u>. Links have also been provided to summaries and full reports of the main issues raised in the representations made pursuant to Regulation 18. Further detail is provided in Schedules 1 and 2 of this Appendix. The Council has therefore met the requirements of Regulation 22(1)(c) (i) to (iv).

# SCHEDULE 1 – BODIES AND PERSONS INVITED TO MAKE REPRESENTATIONS

20th Century Society	British Geological Survey
ACERT	BT Group Ltd
Action Deafness	Buckinghamshire County Council
Advance UK	Buttery and Watson
Age UK	Cadent Gas Ltd
Aims Ltd	CALA Group Ltd
All Things Neighbourhood Planning	Cambridgeshire County Council
AMA Midlands	Campaign for Real Ale, Leicester Branch
Amec	CAMRA
Ancerspa	Canal and Rivers Trust
andash	capita
Andrew & Ashwell	Carter Jonas LLP
Andrew Martin Associates	Catesby Property Group
Anstey CP	CBRE
Arriva Bus	Cenex
asra	Central Bedfordshire Council
Astill Planning	Centre for Ecology and Hydrology
Bailey Planning	Centrica PLC
Barkby & Barkby Thorpe CP	Cerda Planning
Barratt & David Wilson Homes North Midlands	CfDS
Barratt Homes North Midlands	CGMS
Barton Willmore	CgMs
Bellway Plc	CgMs on Behalf of Hammersons
Bidwells	Charnwood Borough Council
Birstall Golf Course	Church Commissioners for England (normally just DoL)
Birstall Parish Council	Civil Aviation Authority
Blaby District Council	Co-Operative Group
Blaby Parish Council	Corby Borough Council
Bloor Homes	Countryside Properties (UK) Limited
BNP Paribas	Countryside Properties (WPL) Limited
Bouldins	County Life Homes Ltd
Bovis Homes Group Plc	CPRE
Boyer Planning	CQBA
Bradgate Heights Residents Association (BHRA)	Crest Nicholson PLC

Braunstone Town Council	Davidlock
British Gas	Davidsons Developments Limited
de Montfort University	Fisher German
Deloitte	Forestry Commission
Deloitte LLP on Behalf of CEMEX	Forum for the Future
Department for Business Innovation and Skills;	Foundation Planning
Department for Communities and Local Government;	Fox Group
Department for Culture, Media and Sport	Foxton Inclined Plane Trust
Department for Education	Framptons
Department for Environment, Food and Rural Affairs	Free Schools Capital
Department for Transport;	Freeth Cartwright
Department of Health	Freight Transport Association
Department of Work and Pensions;	Friends of Highway Spinney
Depol	Friends of Queens Road Allotments
Derbyshire County Council	Fusion Online
DevPlan UK	Galliford Try plc
Disability Rights and Awareness	Gilbert & Hall Ltd
DLP Consultants	Gillings Planning
DTZ	Gladman
DTZ on behalf of The University of	Glenfields CP
Leicester	
East Leicestershire and Rutland Clinical Commissioning Group	glhearn
East Midlands Chamber (Derbyshire, Nottinghamshire, & Leicestershire)	Goodman
Eden Park Group LTD	GR-1
EE	Grafton Group PLC
EMH Group	Grater Manchester Combined Authority
Enderby Parish Council	Green Belt Group
English Heritage	Green Fox Community Energy Cooperative Ltd
Environment Agency (Leicestershire)	GVA
Equality and Human Rights Commission	H B Lewis & Sons Ltd
Evington Footpath Conservation Area Society (EFCAS)	Hamilton Residents' Association
Environment Manager, Investment	Harborough District Council
Fairhurst	Harborough London
Federation of Muslim Organisations (Leicestershire)	Harris Lamb Ltd

Fields in Trust	Harris McCormack
First Bus	HBJ-GW
Henry Boot	Leicester Business Voice
Highways Agency	Leicester Centre for integrated Living
Hinckley & Bosworth Borough Council	Leicester City CCG
Home Builders Federation	Leicester City Clinical Commissioning
	Group
Home Office	Leicester City Football Club
Homes and Communities Agency	Leicester Civic Society
Housing Division, Leicester City Council	Leicester College
How Planning	Leicester Community Radio
Howkins and Harrison	Leicester Connexions (Part of LCC)
Ibstock Brick Ltd	Leicester Council of Faiths
iceni projects	Leicester Disabled Peoples Access Group
INDIGO planning	Leicester Forest East PC
INNES- England	Leicester Green Party
Insight Plan	Leicester Racial Minority VCS Assembly
Institute of Directors (Leicestershire	Leicester Riders
Branch)	
Intali	Leicester shire promotions
Interim Manager, Transport Strategy	Leicester Spokes
ISH	Leicester Theatre Trust
James Sellicks	Leicester Tigers Rugby Club
Jarroms	Leicester United Caribbean Association
Jelson Limited	Leicester University
JWPC	Leicestershire & Rutland Sport (LRS)
Kirby Muxloe Parish Council	Leicestershire and Rutland Sport Board (Share Sport Eng)
Kirkwells	Leicestershire and Rutland Wildlife Trust
Knighton Forum	Leicestershire Campaign for better transport
KPW Architects	Leicestershire Chamber of Commerce
LABA	Leicestershire County Council
LACBA	Leicestershire County Council - Waste
	Planning
Lamp Direct	Leicestershire County Cricket Club
Landmark Planning Limited	Leicestershire Fire and Rescue
LASS and Well for Living (LASS Social	Leicestershire Police
Enterprise Ltd)	
Lawn Tennis Association	Lichfields
LCC	Lichfields on behalf of London Metric
	Saturn Limited

Leicester Access Forum	Lidl
Lincolnshire County Council	New College Leicester, Learning and Sports Village
Living Streets	NFU
LLEP	NHS National Commissioning Board
LLGBC	NHS Property Services
Local Access Forum	Nineteen47
Local Resident	NJUG
Loughborough University	North West Leicestershire District Council
Lovell Partnerships Ltd	Nottinghamshire County Council
Lucas Land	NPCU
Marine Management Organisation	NRS Property
Marrons Planning	02
Marrons Shakespeare	Oadby and Wigston Borough Council
Mather Jamie	Office of Rail Regulation
McCarthy & Stone Retirement Lifestyles Limited	Older Persons Forum, Retired Friends Group and 50+ group
Melton Borough Council	Orange
Members of Parliament	Overdale Infant School
Mencap	Oxalis planning
Merlin Properties Limited	Pak Foods & Raavi Foods Ltd
Micropneumatics	PDE Consulting
Midland Mainline	Peacock and Smith
Ministry of Defence;	Pegasus Group
Ministry of Justice	Persimmon Plc
Mobile Operators Association	Phillips Sutton Associates LTD
Mono Consultants Limited	Pick Everard
Montagu	Planning Potential Ltd
Montagu Evans LLP	Planning Prospects
Morris Homes Ltd	Planning, Transport and Economic Development
Mosaic 1898	Planware
Mslaw	Planware Ltd on behalf of McDonalds
Nathaniel Lichfield & Partners	Porta Planning LLP
National Housing Federation	Private submission
National Offender Management Services	Project Officer (Air Quality Systems)
National Union of Students - NUS	Property
Natural England	Public Health
NCP	PWA Planning
Network Rail	Rae and Co Ltd

New College Leicester	Raglan
Redrow Homes East Midlands	Tesni Properties Limited
Redrow PLC	The Coal Authority
Renewable UK	The Conservation Volunteers
RGP Architects	The Cooke E-Learning Foundation (ta: E2)
Road Haulage Association.	The Crown Estate
Rowlatts Hill Allotment Society	The Environment Agency
RPS	The Friends of Highway Spinney
RPS Group	The Georgian Group
RPS Planning & Development	The Leicestershire Golf Course
RSPB - Leicester	The Miller Group Ltd
Rutland County Council	The Ramblers Association
Rutland Planning	The Theatres Trust
Save our Shops Leicester	Theatres Trust
Savills	Three
Scraptoft Parish Council	Thurcaston & Cropston PC
Sedgwick Associates	Thurmaston Parish Council
Senior Environment Consultant (Climate	Thurnby and Bushby Parish Council
Change, Investment)	
Senior Environmental Consultant	T-Mobile
Severn Trent Water	Tourism, Culture and Inward Investment
Shonki Brothers	Troy Planning & Design
Signet Planning	Turley
Sikh Federation (UK)	Turley Associates
Silkstone Environmental	Turley on behalf of Aldi Ltd
Sirius Planning	Turley on behalf of David Cullen Homes Ltd
Sowden Group	Turley on behalf of DeMontfort University
SPG	Turley, on behalf of De Montfort University
Sport England	Twigg
SRA architecture	Valonline
SSA Planning Limited	Victorian Society
SSR Planning	Vista Blind
St Matthews Big Local Partnership Board.	Vodafone
St. Modwen Properties PLC	Walsall Council
Stoneygate Conservation Area Society	Walton-co
Stoughton Parish Council	Wanlip Parish Meeting
Sustainable Development Team	Watkin Jones
Taylor Wimpey plc	Westbridge Living

Taylor Wimpey Strategic Land	Westleigh Homes
Wood Plc on behalf of National Grid	Woodland Trust
Woodgate Residents Association	WYG
159 Individuals	

# SCHEDULE 2 – SUMMARY OF THE KEY CHANGES TO THE NEW LEICESTER LOCAL PLAN BETWEEN REGULATION 18 AND REGULATION 19

Changes have been made to the new Leicester Local Plan between the Draft Plan (Regulation 18) which was consulted on in September 2020 and the Submission Plan (Regulation 19) which was consulted on in January 2023. These changes are in response to the following:

- Comments made during the public consultation.
- Recommendations made through the Sustainability Appraisal.
- Changes to the NPPF in February 2019 and July 2021; ongoing updates to National Planning Practice Guidance; and changes to CIL Regulations.
- General Factual Updates.
- Amendments to Use Classes Order.
- Additional cross referencing to other policies.

# **Chapter 1 – Introduction**

- Factual Updates.
- Updated Diagram.

# Chapter 2 – A Profile of Leicester: A Spatial Portrait

• Factual Updates.

# Chapter 3 – Vision for Leicester

• No Changes.

# **Chapter 4 – Strategy for Leicester**

- Factual Updates, inclusion of National Planning Policy updates and the 35% housing uplift for Leicester.
- Amended reference to incorporate updated evidence.
- Updated Key Diagram.
- Policy SL01 change in figures relating to need of housing and employment land. Strategic site Leicester General Hospital removed.
- Policy SL02 change in figures. Included references to other plan policies. Added reference to Biodiversity Net Gain. Included reference to Household Waste Recycling Centre.
- Policy SL03 change in figures. Included references to other plan polices. Added reference to Biodiversity Net Gain.
- Policy SL04 change in figures. Included references to other plan policies.
- Policy SL05 change in figures. Included references to other plan polices. Added wording regarding cross-boundary cooperation around education provision. Incorporated wording regarding open space used in other strategic policies.

• SL06 – General Hospital site removed. Beaumont Park Site allocation included which is for employment and gypsy & traveller transit provision, inclusion of associated figures.

# Chapter 5 – Housing

- Updated evidence base; Factual Updates; Tables updated.
- Housing land supply position updated in Table 1 (buffer included which was not considered in Reg 18 consultation plan).
- Policy Ho01 updated appendix reference; also, the sites allocations in the appendix updated with capacities.
- Policy Ho02 criterion a) removed, included reference to SPDs, added new criterion
   d) which incorporates compliance with environmental, design and heritage policies.
- Policy Ho03 updated table references, included wording that expects 10% of affordable housing to meet M4(3) technical standards.
- Policy Ho04 added spatial criteria to policy which now includes 10% affordable housing on brownfield land in different areas of the city. Also added a diagram in the chapter showing those areas to link this policy. Added clause that tackles developers trying to circumvent the policy by subdividing sites. Included clause relating to offsite affordable housing provision. Included clause regarding affordable housing as First Homes and as social or affordable rent.
- Paragraph introduced on 'commuted sums' (para 5.28 in the Submission Plan).
- Policy Ho05 housing densities increased.
- Policy Ho06 no changes.
- Policy Ho07 included reference to specific use Class C3.
- Policy Ho08 included references to other plan policies, included references to HMO Article 4 direction, separated criterion c) into c) and d) to expand on parking management.
- Policy Ho09 added two criteria to assess the conversion of 4+ bedroom housing into flats.
- Policy Ho10 reworded positively.
- Policy Ho11 stronger emphasis on detriment to amenity of existing residential properties, included additional criterion requiring a management plan to be submitted as part of the proposal.
- Policy Ho12 included references to other policies.

# Chapter 6 – Climate Change and Flood Risk

- updated evidence base, factual changes
- CCFR01 Title changed, criteria expanded to make policy more comprehensive, separate sections for "waste and resources" and "resilience to climate change" removed and embedded within policies CCFR02, CCFR04, and CCFR06, additional requirements set for development to achieve emissions reductions beyond those

required by Part L of the 2013 Building Regs and for residential development to meet the optional higher standard set in Part G of Building Regulations 2013.

- CCFR02 new Policy.
- CCFR03 new Policy.
- CCFR04 new Policy.
- CCFR05 formerly policy CCFR02. References to other plan policies have been added. Criterion to address proposals for wind turbine projects has been added.
- CCFR06 formerly policy CCFR03. Criterion a) expanded to include detail on which categories of development will require flood risk assessments. Criterion b) has been expanded to include the requirement for implementation of the sequential approach and/or implementation of flood mitigation measures. Wording has been added to specify that permission will not be granted for development within Flood Zone 3b, with exceptions made and criteria set out that those exceptions must adhere to.

#### Chapter 7 – Health and Wellbeing

- Updated evidence base, factual changes.
- Policy HW01 included references to other policies, minor wording additions to make policy more comprehensive.
- Policy HW02 no changes.

# **Chapter 8 – Delivering Quality Design**

- Updated evidence base, factual updates.
- DQP01 included reference to National Design Guide and National Model Design Code
  - **Context, Character and Identity:** expanded criterion d) to make it more comprehensive, added criteria e) and f)
  - **Built Form:** added criterion d)
  - **Mix of Uses:** expanded criterion b) to be more comprehensive.
  - **Homes and Buildings:** added criteria a) and b), policy wording made more comprehensive.
  - **Resources and Lifespan:** added criterion b)
  - **Building for a Healthy Life and National Design Guide:** included wording around the National Design Guide
- DQP02 added criterion b), included wording to make other criteria more comprehensive.
- DQP03 removed criterion b).
- DQP04 split criterion a) into two, added criterion g).
- DQP05 minor wording changes to criteria.
- DQP06 criterion b) split into two, criterion g) removed.
- DQP07 policy split into two criteria.
- DQP08 no changes.

- DQP09 all wording below "Projecting and Fascia Signs" (inclusive) moved to supporting text.
- DQP10 no changes.
- DQP11 no changes to policy; added para. 8.44 to supporting text.

# Chapter 9 – Central Development Area (CDA)

Updated evidence base, factual changes

- Policy CDA01 included references to other policies, included wording around Article 4 Directions, altered wording to make policy more comprehensive.
- Policy CDA02 included reference to other policy.
- Policy CHA01 new policy (replaced CDA03).
- Policy CHA02 new policy (replaced CDA03).
- Policy CHA03 new policy (replaced CDA03).
- Policy CHA04 new policy (replaced CDA03).
- Policy CHA05 new policy (replaced CDA03).
- Policy CHA06 new policy (replaced CDA03).
- Policy CHA07 new policy (replaced CDA03).
- Policy CHA08 new policy (replaced CDA03).
- Policy CHA09 new policy (replaced CDA03).
- Policy ORA01 renamed from "CDA04", replaced tabular format with bullet-points.
- Policy ORA02 new policy (replaced CDA05).
- Policy ORA03 new policy (replaced CDA05).
- Policy ORA04 new policy (replaced CDA05).
- Policy ORA05 new policy (replaced CDA05).

# Chapter 10 – Heritage

- Updated evidence base, factual changes.
- Policy HE01 included references to other plan policies, added wording to make criteria more comprehensive and in line with the NPPF.
  - **Listed Buildings:** added criterion d)
  - Local Heritage Assets (non-designated heritage assets): added reference to appendix 2, added wording to support the development of proposals that retain and explain the historic and social values of statues, plaques, memorials, or monuments.
- Policy HE02 no change.

# Chapter 11 – Culture and Tourism

- Updated evidence base, factual changes.
- Policy CT01 included references to other plan policies, amendments to criterion c), added criterion e).

- Policy CT02 included references to other plan policies, minor wording changes to criterion b), added term "enhances" to criterion g).
- Policy CT03 changed reference to use class to reflect 2020 update, removal of criterion c), added criterion d).
- Policy CT04 included reference to policy CCFR01.
- Policy CT05 title and minor wording changes to policy, included references to other plan policies.

# Chapter 12 – Employment

- Updated evidence base, factual updates, tables updated.
- Highlighted unmet need in paragraph 12.22.
- Policy E01 new Policy.
- Policy E02 updated references to use classes in line with 2020 update, replaced individual criteria for each exceptional use class with two criteria that are applicable to all mentioned "other uses".
- Policy E03 included reference to residential amenity, updated references to use classes in line with 2020 update.
- New Walk and Old Town Offices text and policy removed.
- Policy E04 updated references to use classes in line with 2020 update, "flooding" included in criterion d).
- Policy E05 updated references to use classes in line with 2020 update, replaced individual criteria for each exceptional use class with two criteria that are applicable to all mentioned "other uses". Added wording outlining circumstances in which housing will be acceptable.
- Policy E06 included references to other plan policies, updated references to use classes in line with 2020 update.
- Policy E07 some criteria reworded to improve clarity, criteria e), g), and f) removed.
- Policy E08 included references to other plan policies, criterion c) improved to be more comprehensive.

# Chapter 13 – Town Centre and Retail

- Updated evidence base, factual changes, updates in relation to class E and impacts to retail centres.
- Policy TCR01 included references to other plan policies, added wording that gives preference to edge-of-centre and out-of-centre sites that are accessible and well connected to the town centre when considering proposals outside of the retail hierarchy.
- Additional paragraph added about health check assessment and designation changes (13.10).
- Policy TCR02 added an overall floorspace policy trigger, removed specific locational policy triggers, included proximity trigger to change the floorspace trigger when

proposal is near a district centre or local centre, application of policy also to mezzanine floorspace.

- Included a section on retail study health checks (13.16 & 13.17).
- Policy TCR03 included references to other plan policies, added subheading and wording relating to "Public Toilets".
- Reference made to COVID-19 pandemic in para 13.24. Policy TCR04 included references to other plan policies, updated references to use classes in line with 2020 update, added wording to make policy more comprehensive, added criteria to guide development on upper floors, removal of wording around 'retail development outside the central shopping core'.
  - Retail development outside the central shopping core: subsection removed.
- Policy TCR05 added criterion e), added reference to policy TCR06.
- Policy TCR06 updated references to use classes in line with 2020 update, added wording to make policy more comprehensive, added separate criteria to address how development should reduce litter, added wording around conditioning the prior criteria, associated supporting text added in para 13.38.
- Policy TCR07 updated references to use classes in line with 2020 update, added criteria for other uses that may be acceptable including active frontages and addressing residential amenity.
- Policy TCR08 no changes.
- Policy TCR09 changed title, spilt paragraph into two criteria, added criterion c).

# Chapter 14 – Open Space, Sport, and Recreation

- Updated evidence base, factual changes, updated diagrams, clarification regarding site allocations on de-designated green wedge land.
- Policy OSSR01 reworded policy to be more comprehensive, added criteria f) and g).
- Policy OSSR02 added criteria e) and f).
- Policy OSSR03 no changes.
- Policy OSSR04 no changes.
- Policy OSSR05 wording of criterion b) clarified; included reference to other plan policy.
- Policy OSSR06 Included references to other plan policies, added criterion d).
- Policy OSSR07 Addition of paragraph 14.25 in supporting text to clarify on the potential for proposals for hydroelectric generation in Leicester. Added wording to make policy more comprehensive, added criterion I).

# Chapter 15 – The Natural Environment

• Updated evidence base, factual changes, addition of paragraph 15.5 to clarify the reasons for allocation of housing sites on former biodiversity sites, clarification added to paragraphs 15.9, 15.10, and 15.11 around biodiversity net gain requirements for development.

- Policy NE01 added criterion d).
- Policy NE02 added wording to make clear that policy is aligned with national legislation on biodiversity net gain requirements.
- Policy NE03 Title and wording of policy changed to clarify that policy covers 'blue' infrastructure.
- Policy NE04 added wording to clarify that policy is aligned with NPPF paragraph 180 c).

# Chapter 16 – Transportation

- Updated evidence base, factual changes, diagrams updated.
- Policy T01 included reference to the Leicester Transport Plan, added wording to make policy more comprehensive, added criteria b) c) and d).
- Policy T02 replaced reference to European nitrogen dioxide targets with UK and WHO targets, removal of point referring to the implementation of Clean Air Zones.
- Policy T03 removed reference to policy DQP01, added two criteria a) and b)
  - **Pedestrians and People with Limited Mobility:** added criterion f),
  - **Cycling:** removed criterion g),
  - o Busses: added wording to make criterion j) more comprehensive,
  - **Rail:** added wording to make criterion n) more comprehensive, removed criterion m).
- Policy T04 no changes.
- Policy T05 final paragraph split into criteria c) and d).
- Policy T06 added reference to appendix 4.
- Policy T07 policy rewritten.
- Policy T08 removed.

# Chapter 17 – Future Minerals and Waste Needs

- Updated evidence base, factual changes. Paragraphs 17.4 and 17.5 added to provide information on Waste Needs Assessment.
- Policy FMWN01 references to other plan policies have been added.
- Policy FMWN02 reference to other plan policy has been added.
- Policy FMWN03 no changes.
- Policy FMWN04 references to other plan policies have been added.

# Chapter 18 – Development and Infrastructure

- Updated evidence base, factual changes.
- Policy DI01 Viability: added sentence requiring planning applications to be in accordance with policy requirement set out int the Local Plan.
- Policy DI02 new Policy.

# Chapter 19 – Neighbourhood Planning

• Factual changes.

# **Chapter 20 – Planning Enforcement**

• No changes.

# Chapter 21 – Monitoring

• No changes.

# Appendices

- Factual changes
  - **Appendix 2:** included list of Archaeology sites, updated listed buildings and conservation areas.
  - Appendix 3: "Abbey Lane" and 'Wharf Street North' added to "Tier 4: Local Centres"; "Walnut Street", Wharf Street" and "Abbey Lane" removed from "Tier 5: Neighbourhood Parades
  - **Appendix 4:** new appendix
  - **Appendix 5:** updated accordingly.
  - Appendix 6: Update to estimated site capacities. Removal of sites: 463, 473, 474, 485, 515, 527, 546, 566, 604, 605, 627, 653, 663, 665, 675, 1006, 1021
  - Appendix 7: Inclusion of additional definitions e.g., Historic Environment, fenestration, green space

# Policies Map

• Atlas of Changes to the Policies Map (2022)

# Appendix 4 – Submission (Regulation 19 Publication) Plan Consultation

# JANUARY TO FEBRUARY 2023

This appendix addresses the requirements of Regulation 22(1)(c) (v):

(v) if representations were made pursuant to Regulations 20, the number of representations made and a summary of the main issues raised in those representations.

#### Introduction

The Council published the Leicester Local Plan 2020 to 2036 Submission (Regulation 19 publication) plan, associated evidence base and supporting documents including the Policy Map, Sustainability Appraisal, Habitats Regulation Assessment, and Equalities Impact Assessment for a 6-week consultation period during January and February 2023. The consultation sought views on whether the plan is sound and complies with the relevant legal requirements, including the duty to co-operate. This was in order for representations to be made on the plan and supporting documents before they are submitted for examination by a Planning Inspector.

#### Who was consulted under Regulation 19 and how was this undertaken?

- The consultation sought views on whether the plan is sound and complies with the relevant legal requirements, including the duty to co-operate. Schedule 1 sets out the bodies consulted.
- The Council ensured that the consultation was undertaken in accordance with the Statement of Community Involvement. The following methods were used to publicise the consultation and ensure that consultation material was available and accessible:
- All consultation documents and forms (downloadable) were available on the council's website.
- Hard Copies were made available to view at the Council's libraries, and Customer Services Centre
- Email and letter notifications to those on the local plan consultation database and to properties adjoining site allocations.
- Site notices site notices adjoining each proposed housing and employment allocation.
- Social media posts throughout the consultation.
- Press release to local media.
- Focused meetings on request.
- Ward meetings on request.
- Virtual meetings for Parish Councils on request.

- Email to local politicians (MP and City Councillors) setting out how documents can be viewed, how to respond and the deadline for responses.
- Email to developers, stakeholders and community forums setting out how documents can be viewed, how to respond and the deadline for responses.
- Responding positively and proactively to equal access requests.

Arrangements were made for representations on the Local Plan and its evidence base to be submitted on-line, by email and by letter with the option of using a consultation form that could be completed via the Council's website or by using a word version available to download online.

#### Summary of the main issues raised including the Council responses/actions.

515 respondents raised 1129 comments under Regulation 20, 12 of which were submitted as petitions. Note - Seven individual representations and 1 petition were submitted after the consultation deadline.

Schedule 2 of this Appendix summarises the main issues raised by representations received. This is organised by plan chapter and includes comments on proposed changes to the policies map and key evidence where relevant. In responding to representations, the council has considered the need for potential amendments to the proposed submission where appropriate. Where justified, this is explained within the table. A separate schedule of proposed changes has been prepared, which has not been the subject of public consultation or sustainability appraisal. This schedule has been submitted in accordance with paragraph 1.5 of the Planning Inspectorate's Procedure Guide for Local Plan Examinations, June 2019.

# Conclusion

The summary above, in combination with <u>Schedule 1</u> of this Appendix, explains which bodies and persons were invited to make representations under Regulation 19 in line with plan-making regulations and the Council's Statement of Community Involvement 2019 and temporary addendum 2020. The section above and Schedule 2 of this Appendix set out the number of representations made pursuant to Regulation 20 and a summary of the main issues raised in those representations. The Council has therefore met the requirements of Regulation 22(1)(c) (v).

# SCHEDULE 1 – DETAILS OF THE CONSULTATION UNDERTAKEN

# A – Those notified of the Regulation 19 Consultation

20th Century Society	British Gas
ACERT	British Geological Survey
Action Deafness	BT Group Ltd
Advance Uk	Buckinghamshire County Council
Age UK	Buttery and Watson
Alder King	Cadent Gas Ltd
All Things Neighbourhood Planning	CALA Group Ltd
AMA Midlands	Cambridgeshire County Council
Amec	Campaign for Real Ale, Leicester Branch
Ancerspa	CAMRA
andash	Canal and Rivers Trust
Andrew & Ashwell	capita
Anstey CP	Carney Sweeney
Arriva Bus	Carter Jonas LLP
Asra	Catesby Property Group
Astill Planning	CBRE
Avison Young - UK	Cenex
Barkby & Barkby Thorpe CP	Centerline Tooling Limited
Barratt & David Wilson Homes North Midlands	Central Bedfordshire Council
Barratt Homes North Midlands	Centre for Ecology and Hydrology
Barton Willmore	Centrica PLC
Beaumont Lodge Primary School	Cerda Planning
Beautiful Basements	CfDS
Bellway Plc	CGMS
Bidwells	CgMs
Birstall Golf Course	CgMs on Behalf of Hammersons
Birstall Parish Council	Charnwood Borough Council
Blaby District Council	Church Commissioners for England (normally just DoL)
Blaby Parish Council	Civil Aviation Authority
Bloor Homes	ClientEarth
bnp paribas	Conservation Casework Manager,
Bouldins	Co-Operative Group
Bovis Homes Group Plc	Corby Borough Council
Boyer Planning	Countryside Properties (UK) Limited
Bradgate Heights Residents Association (BHRA)	Countryside Properties (WPL) Limited
Braunstone Town Council	County Life Homes Ltd

Campaign to Protect Rural England	Federation of Muslim Organisations (Leicestershire)
СОВА	Fields in Trust
Crest Nicholson PLC	First Bus
CT Planning	fishergerman
Data Academy Ltd	Forestry Commision
Davidlock	Forum for the Future
Davidson Homes	Fox Group
Davidsons Developments Limited	Foxton Inclined Plane Trust
de Montfort University	Framptons
Deloitte	Free Schools Capital
Department for Business Innovation and	Freeth Cartwright
Skills;	
Department for Communities and Local	Freight Transport Association
Government;	
Department for Culture, Media and Sport	Friends of Clarendon Park
Department for Education	Friends of Highway Spinney
Department for Environment, Food and	Friends of Queens Road Allotments
Rural Affairs	
Department for Transport;	G.L.C.M. F.I.S.M
Department of Health	Galliford Try plc
Department of Work and Pensions;	Gilbert & Hall Ltd
Depol	Gillings Planning
Derbyshire County Council	Gladman
DevPlan UK	Glenfields CP
Disability Rights and Awareness	Glhearn
DLP Consultants	Goodman
DTZ	GR-1
East Midlands Chamber (Derbyshire,	Grafton Group PLC
Nottinghamshire, & Leicestershire)	
East Midlands Rail	Grater Manchester Combined Authority
Eden Park Group LTD	Green Belt Group
EE	Green Fox Community Energy
	Cooperative Ltd
EMH group	GVA
Enderby Parish Council	H B Lewis & Sons Ltd
English Heritage	Hamilton Residents' Association
Environment Agency (Leicestershire)	Harborough District Council
Equality and Human Rights Commission	Harborough London
Evington Footpath Conservation Area Society (EFCAS)	Harris Lamb Ltd
Fairhurst	Harris McCormack

HBJ-GW	Leicester Centre for integrated Living		
Heatons	Leicester City Clinical Commissioning		
	Group		
Henry Boot	Leicester City Football Club		
Herrick Primary School	Leicester Civic Society		
Highways Agency	Leicester College		
Hinckley & Bosworth Borough Council	Leicester Community Radio		
Home Builders Federation	Leicester Connexions (Part of LCC)		
Home Office	Leicester Council of Faiths		
Homes and Communities Agency	Leicester Deaf Centre		
How Planning	Leicester Disabled Peoples Access Group		
Howkins and Harrison	Leicester Forest East PC		
Ibstock Brick Ltd	Leicester Green Party		
Iceni Projects	Leicester Racial Minority VCS Assembly		
INDIGO planning	Leicester Riders		
INNES- England	Leicester Spokes		
Insight Plan	Leicester Theatre Trust		
Institute of Directors (Leicestershire	Leicester Tigers Rugby Club		
Branch)			
Intali	Leicester United Caribbean Association		
ISH	Leicester University		
James Bailey Planning	Leicestershire & Rutland Sport (LRS)		
James Sellicks	Leicestershire & Rutland Wildlife Trust		
Jarroms	Leicestershire and Rutland Sport Board (Share Sport Eng)		
Jelson Limited	Leicestershire and Rutland Wildlife Trust		
JWPC	Leicestershire Campaign for better transport		
Kirby Muxloe Parish Council	Leicestershire Chamber of Commerce		
Kirkwells	Leicestershire County Council		
Knighton Forum	Leicestershire County Council - Waste Planning		
KPW Architects	Leicestershire County Cricket Club		
LABA	Leicestershire Fire and Rescue		
LACBA	Leicestershire Partnership NHS Trust		
Lamp Direct	Leicestershire Police		
Landmark Planning Limited	Leicestershire promotions		
LASS and Well for Living (LASS Social	Lichfields		
Enterprise Ltd)			
Lawn Tennis Association	Lidl		
Leicester Business Voice	Lincolnshire County Council		
Living Streets	Natural England		

LLEP	NCP	
LLGBC	Network Rail	
Local Access Forum	Network Rail Property	
Local Resident	New College Leicester	
Loughborough University	New College Leicester, Learning and	
	Sports Village	
Lovell Partnerships Ltd	Nexus Planning	
Lucas Land	NFU	
Lucy White Planning Limited	NHS National Commissioning Board	
Marine Management Organisation	NHS Property Services	
Marrons Planning	nineteen47	
Marrons Shakespeare	NJUG	
Mather Jamie	North West Leicestershire District	
	Council	
McCarthy & Stone Retirement Lifestyles Limited	Nottinghamshire County Council	
Melton Borough Council	NRS Property	
Members of Parliament	02	
Mencap	Oadby and Wigston Borough Council	
Merlin Properties Limited	Oakmeadow Surgery	
Micropneumatics	Office of Rail Regulation	
Ministerial Correspondence and Public	Older Persons Forum, Retired Friends	
	Group, and 50+ group	
Ministry of Defence	Leicester Friends of the Earth and	
	Climate Action Leicester and Leicestershire	
Ministry of Justice	Orange	
Mobile Operators Association	Overdale Infant School	
Mono Consultants Limited	oxalis planning	
Montagu		
Montagu Evans LLP	Pak Foods & Raavi Foods Ltd Partnerships North – East Midlands	
Nontagu Evans LLP	Region; Countryside Properties	
Morris Homes Ltd	PDE Consulting	
Mosaic 1898	Peacock and Smith	
Mslaw	Pegasus Group	
My Neighbourhood Plan	Persimmon Plc	
Nathaniel Lichfield & Partners	Phillips Sutton Associates LTD	
National Grid (Avison Young UK)	Pick Everard	
National Housing Federation	Planning Potential Ltd	
National Offender Management Services	Planning Prospects	
National Union of Students - NUS	Planware	
Planware Ltd on behalf of McDonalds	SSR Planning	

Porta Planning LLP	St Matthews Big Local Partnership Board.	
PWA Planning	St. Modwen Properties PLC	
Quod	Stantec	
Rae and Co Ltd	Stoneygate Conservation Area Society	
raglan	Stoughton Parish Council	
RDS DESIGN LTD	Strata	
Redrow Homes East Midlands	Sustainable Development Team	
Redrow Homes Limited	Taylor Wimpey plc	
Redrow PLC	Taylor Wimpey Strategic Land	
Renewable UK	Tesni Properties Limited	
RGP Architects	Tetlow King Planning	
Road Haulage Association.	The City of Leicester College	
Rock Art Screen-print	The Coal Authority	
Rowlatts Hill Allotment Society	The Conservation Volunteers	
RPS	The Cooke E-Learning Foundation (ta: E2)	
RPS Group	The Crown Estate	
RPS Planning & Development	The Environment Agency	
RSPB - Leicester	The Friends of Highway Spinney	
Rutland County Council	The Georgian Group	
Rutland Planning	The Leicestershire Golf Course	
Save our Shops Leicester	The Mead Educational Trust (for	
	Rowlatts Mead school)	
Savills	The Miller Group Ltd	
Scraptoft Parish Council	The Ramblers Association	
Sedgwick Associates	Theatres Trust	
Severn Trent Water	Three	
Shonki Brothers	Thurcaston & Cropston PC	
Showcase Estates	Thurmaston Parish Council	
Signet Planning	Thurnby and Bushby Parish Council	
Sikh Federation (UK)	T-Mobile	
Silkstone Environmental	Troy Planning & Design	
Sirius Planning	Turley	
Sowden Group	Turley Associates	
SPG	Turley on behalf of Aldi Ltd	
Sport England	Turley on behalf of David Cullen Homes Ltd	
SRA architecture	Turley on behalf of DeMontfort University	
SSA Planning Limited	Turley, on behalf of De Montfort University	
Twigg	Wanlip Parish Meeting	

Tyler Parkes	Water Resources West
University of Leicester Students' Union	Watkin Jones Group
Valonline	Western Power Distribution
Victorian Society	Westleigh Homes
Virgin Media	Wood Plc on behalf of National Grid
Vista Blind	Woodgate Residents Association
Vodafone	Woodland Trust
Walsall Council	WSP
Walton-co	WYG
3659 other Individuals	

### B – Notification Materials

- Notification email/letters
- Statement of representations procedure
- Representation form letter
- Screenshots of webpages

# SCHEDULE 2 – SUMMARY OF THE MAIN ISSUES RAISED BY REPRESENTATIONS PERSUANT TO REGULATION 20 AND COUNCIL RESPONSE

### Duty to Cooperate

Comments from: 282, 283, 291, 297, 316, 317, 318, 339, 350

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response
The Charnwood Infrastructure Delivery Plan has direct impact on this site development (Land north of A46), as it borders Charnwood Borough Council land, roads, service, and infrastructure directly. Access to the site by foot or car from the north must be through Charnwood. Health, education, and other infrastructure needs will likely be met in part by Charnwood Borough Council. This is insufficiently addressed within the current plan, and within the Duty to Cooperate.	283 (Thurcaston Against Development)	The Council have consulted and will continue to engage with Charnwood Borough Council through Duty to Cooperate meetings. An agreed Statement of Common Ground is available under SCG/6.
The Council have failed in their DUTY TO COOPERATE, because they have failed to consider the impact on green sites.	350 (Cllr Nigel Porter)	The Policy has been appraised as part of the SA/SEA. Policies in Chapter 14 Open Space, Sport and Recreation have criteria that applications will be assessed against regarding development on Open Space and Green Wedge.
Comments Relating to Statement of Compliance with the Duty to Cooperate (Nov	ember 2022) – SD/12	
Document SD/12 Statement of Compliance with the Duty to Cooperate (November 2022) states that the Strategic Transport Assessment is being prepared and will inform longer term growth. This does not address assessment of impact for this site, and thus the duty to cooperate is incomplete.	283 (Thurcaston Against Development)	The Strategic Transport Assessment is ongoing and is being compiled with the neighbouring authorities.

## Comments Relating to Leicester & Leicestershire Authorities - Statement of Common Ground relating to Housing and Employment Land Needs (June 2022) – SCG/1

,,		
LCC has engaged constructively, actively and on an ongoing basis with neighbouring authorities, including HDC, as part of the Duty to Cooperate and particularly in relation to the preparation of the Statement of Common Ground (June 2022).	282 (Harborough District Council)	Comments welcomed.
The plan period should be extended to 2039. This will require the consideration of the scope to accommodate additional housing in the City Council's area and a review of the level of unmet need to be found by other HMA authorities as set out in the Leicester and Leicestershire Authorities Statement of Common Ground relating to Employment and Land Needs, April 2022.	291 (Developer Consortium including David Wilson Homes East Midlands, Bloor Homes East Midlands, Davidsons Developments, Hallam Land Management, Harworth Estates, Jelson Homes, L and Q, Redrow Homes, Vistry Group and William Davis Limited)	Plan will be reviewed in 5 years or sooner after adoption.
Unstable reliance on a SoCG which is not universally supported by surrounding Authorities namely Hinckley & Bosworth Borough Council and Harborough District Council.	297 Willoughby Waterleys Resident Association	SoCG has been informed by robust evidence. Harborough have signed the SoCG, Hinckley & Bosworth Borough council are expected to consider this at the end of January.
<ul> <li>Stronger wording in policy is needed with regards to the role of neighbouring authorities in meeting Leicester's unmet need and how Leicester will maintain engagement on this under the Duty to Cooperate.</li> <li>The HBF would suggest that the SoCG on Leicester's Unmet Housing Need should confirm that: <ul> <li>Each authority in Leicestershire will meet its own LHN and a defined amount of Leicester's unmet local housing need (LHN) (except Leicester City itself).</li> <li>This cumulative figure will be the housing requirement figure for each authority respectively; and</li> </ul> </li> </ul>	316 (Home Builders Federation)	This is explained in earlier sections of the plan and does not require reference in SL01. This is a joint work between Leicester & Leicestershire authorities and will be updated and reviewed as other local plans are prepared within the Housing Market Area.

<ul> <li>The authorities acknowledge that additionality in HLS may be required to ensure deliverability and flexibility.</li> <li>Despite the long history of engagement between Leicester &amp; Leicestershire, the SoCG 2022 does not include any conclusive agreement on the strategic cross- boundary matter of the redistribution of unmet LHN from Leicester.</li> </ul>		Leicester City Council cannot amend this document in isolation.
The reliance on neighbouring authorities to deliver 18,694 homes over the plan period is not fully backed up by the Statement of Common Ground, which has not been signed by two of the neighbouring authorities, Hinckley and Bosworth Borough Council and Harborough District Council. This needs to be addressed for this policy to be successful in meeting housing needs. The Statement of Common Ground should be reviewed to take account of the two authorities unwilling to sign the Statement and meet Leicester's unmet needs.	317 (Pegasus Group on behalf of David Wilson Homes, Leicestershire Partnership NHS Trust and University Hospitals of Leicester NHS Trust)	Harborough District Council signed the SoCG in February 2023. Hinckley & Bosworth Borough Council will make a decision in late January 2024.
CEG generally supports the agreed Statement of Common Ground which sets out how unmet needs in the Leicester and Leicestershire area will be met.	318 (CEG)	Support welcomed.
<ul> <li>IML have land interest in the county and are supportive of the distribution approach through the SoCG between Leicester and Leicestershire authorities which has been discussed and supported at Charnwood's Hearings.</li> <li>However, concerned about uncertainty from lack of Hinckley &amp; Bosworth BC's commitment to take on housing need via SoCG.</li> <li>It is incumbent on Leicester City Council to push for more constructive engagement from the HBBC on this strategic matter as a matter of urgency, given that disagreements between constituent authorities cannot be remedied following submission of the LLP for examination, thus risking the LLP being found unsound or legally non-compliant.</li> </ul>	339 (RPS on behalf of IM Land)	Support welcomed and noted. SoCG has been informed by robust evidence. Harborough have signed the SoCG, Hinckley & Bosworth Borough council are expected to consider this at the end of January.

#### **Comments on Consultation Process**

Comments from: 23, 34, 40, 41, 43, 59, 61, 65, 77, 78, 98, 109, 117, 119, 121, 133, 142, 149, 153, 180, 210, 220, 225, 238, 241, 270, 271, 277, 298, 299, 303, 305, 306, 307, 308, 309, 312, 313, 314, 335, 341, 347, 350, 416, 418, 419, 420, 421, 423, 424, 429, 431, 432, 433, 434, 435, 436, 437, 438, 439, 440, 441, 442, 443, 444, 445, 448, 449, 452, 453, 454, 455, 456, 457, 458, 459, 467 468, 469, 471, 472, 473, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485 486, 487, 488, 489, 490, 491 493, 497

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response
Comments Relating to the Consultations		
Not involved in any part of the planning. We were not told of any meetings nor that there would be any building work taking place here.	23 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Site notices were put up at each stage and neighbours notified.
The consultation process was flawed, in that it may have sought views, but the council chose to ignore the views against development of the area knows as Western Park Golf Course. This area received more objections than any other area. It is a green space and should be kept undeveloped for the betterment of all of Leicester and Leicestershire. Lack of taking proper account of local views makes the Local Plan unsound. [Referring to Strategic site 702 "Former Western Park Golf Course"]	34 (Local Resident)	The consultation was undertaken during COVID-19 pandemic, as such the SCI was updated in line with government guidance. Various forms of online consultation were included such as online meetings.
We don't feel as if we were part of any of the planning. They informed us of the plans but only informed half of the street even though this plan would have an impact on the whole street. [Referring to site 577 "Land adjacent to Keyham Lane/Preston Rise"]	40 (Local Resident)	All the consultations were undertaken in accordance with our adopted SCI.
Local residents were not consulted in a timely manner, no information was publicly displayed, and many homes did not receive information from the council.	41 (Local Resident)	Local Plan was consulted on at all stages which were statutory consultations.

		All the consultations were undertaken in accordance with our adopted SCI.
I do not believe that the first stage of the consultation was legally compliant. Residents were not properly informed in a timely manner and no information publicly displayed. Many homes did not receive any formal notification from the council at all. At the meeting held in December residents were informed this was the second consultation even though nobody was able to attend or knew about the first consultation. Consultation was paused during Covid lockdown and therefore not properly compliant of a true consultation.	43 (Local Resident)	Local Plan was consulted on at all stages which were statutory consultations. All the consultations were undertaken in accordance with our adopted SCI. Reg 18 consultation during Covid was conducted for 12 weeks which was over and above the statutory 6 weeks requirement.
Consultation fundamentally flawed as Plan not legally compliant as many residents were not informed of the plan, no leaflets through the post and not supportive of council website.	59 (Local Resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). A leaflet was sent to all households in city during Regulation 18 consultation. Neighbours adjoining the site were notified.
The Consultation Period 2 & 3 was during the 2020 lockdown, the official notice for planning application were not located around Croyland Green. I can say this as I was using the Green for daily exercise walking my dog.	61 (Local Resident)	As above. Photos of the site notices are available.
Proposals fundamentally flawed as have not consulted properly with the local community.	65 (Local Resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).

Policy SL02 has been chosen despite two earlier consultations, one of which excluded residents of the County of Leicestershire. The view and concerns of all affected communities, whether within the Leicester City boundary, including those of Blaby District residents in Glenfield should therefore be considered.	77 (Local Resident)	All representations made have been taken into account, regardless of where they originate. Consultation leaflets were also sent to Leicestershire residents bordering the city.
Consultation deliberately confusing. Should comply with Plain English Campaign. I believe that this whole process has been made as deliberately confusing as possible - therefore discouraging local residents who truly have incredibly important voices, to raise them on this site. Especially when many residents do not have English as their first language. The Plain English Campaign https://www.plainenglish.co.uk/ should be adhered to. Because of this deliberate misleading, the trust has broken down.	78 (Local Resident)	Consultation was carried out in compliance with the Council's adopted SCI.
The Local Plan fails to comply with the duty to co-operate. Despite repeated attempts to engage with the local authority, we have not been appropriately consulted or given a chance to have our voices heard. This lack of consultation and dialogue is a clear breach of the duty to co-operate and undermines the integrity of the planning process. [Referring to site 222 "Evington Valley Road (Former Dunlop Works)"	98 (Madani Schools Federation)	Site letters were sent out to nearby properties including the school during each of the consultations which invited comments on the site. Site notices were also put up as per the Council's adopted Statement of Community Involvement (SD/11).
People unaware of 2020 consultation. The Consultation phase 2 in 2020 was not carried out in an appropriate fashion. Whilst claiming numerous methods to contact residents were used, very few were aware of the consultation through official channels. No response feedback was provided from consultation. The Council also excuses the consultation exercise claiming it was limited by Covid-19, other agencies responded to covid- 19 restrictions by using email or text messages to ensure they reached the community.	109 Mowmacre Young Peoples Play & Development Assoc.	The consultation was undertaken during the COVID- 19 pandemic and the SCI was updated in line with government guidance. Various methods of consultation were used. Responses to representations has been included in Reg 22 statement. Full details of the Regulation

		18 responses are on page 112 of Summary of responses to Regulation 18 (SD/17a).
The local plan should not be considered to be legally compliant; this is due to the fact of the council not carrying out a vital component of the statement of community involvement. Within this, the council failed to carry out the necessary formality of a webinar as stated within the 'Statement of Community Involvement Temporary Addendum' (3 June 2020) The supposed 'webinar' was the video published by Leicester City Council simply outlining the plans overall for Leicester; this does not constitute a webinar because a webinar is defined as 'a seminar conducted over the internet.' The video did not constitute a seminar as there was no discussion between the public, the mayor himself or the council. Due to this clear failure to follow the council's own procedure, this shows that this plan and consultation should be stopped immediately, and the consultation must be started from the beginning and follow the procedure correctly as outlined within Temporary Addendum.	117 (Local Resident)	Online meetings were carried out upon request. Additional help with interpreting documents and submitting comments and or documents was also offered upon request.
Online consultations can be inaccessible to those who do not have access to a stable internet connection or the necessary technology. Furthermore, older individuals who may not be familiar with digital communication tools may find it challenging to participate in an online consultation. This lack of accessibility can have a significant impact on the planning process as it may exclude valuable voices and perspectives from the community. It is essential that alternative methods of consultation are also provided to ensure that all members of the community are given the opportunity to participate and have their voices heard. However, during lockdown and the period of COVID, no technological support was given to the elderly population within our community this shows that the valuable elderly voices and low-income voices within our neighbourhood were ignored and unable to provide their valuable opinion about the proposed development.		
The Local plan should not be considered sound as the COVID-19 pandemic has had a significant impact on our ability to interact with others, especially for those who have been required to shield due to underlying health conditions. As a result, the community may not have been able to see their neighbours and	119 (Local Resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement

discuss opposition to the planned proposal during a vital part in the plan. Face-to- face communication is a crucial aspect of community engagement and consultation, and it can help to foster a sense of community and shared responsibility. However, due to the restrictions imposed by the pandemic, it may not have been possible for individuals to have these conversations, limiting their ability to voice their concerns and share their opinions on the proposal. This could have resulted in the exclusion of valuable perspectives and contributed to a lack of transparency and accountability in the planning process. It is important that alternative methods of consultation are used in situations where face-to-face communication is not possible, to ensure that all members of the community are given a fair opportunity to participate in the planning process.		(SD/11) and government regulations. Neighbours adjacent to the site were notified and ward meetings were offered online. The Council distributed copied of the Local Plan to residents, where requested, and a leaflet was sent to every household in the city. The consultation was also extended in 2020 to allow for further comments to be made.
The consultation itself has not been conducted properly. We have not received any emails or letters with regards to the consultation. Therefore, wide participation was not sought after by the city council's cynical plans.	121 (Local Resident)	Local Plan was consulted on at all stages which were statutory consultations. All the consultations were undertaken in accordance with our adopted SCI.
The local plan should not be considered to be legally compliant; this is due to the fact of the council not carrying out a vital component of the statement of community involvement. Within this, the council failed to carry out the necessary formality of a webinar as stated within the 'Statement of Community Involvement Temporary Addendum' (3 June 2020) - The supposed 'webinar' was the video published by Leicester City Council simply outlining the plans overall for Leicester; this does not constitute a webinar because a webinar is defined as 'a seminar conducted over the internet.' The video did not constitute a seminar as there was no discussion between the public, the mayor himself or the council. Due to this clear failure to follow the council's own procedure, this shows that this plan and consultation should be stopped immediately and the consultation must be started from the beginning and follow the procedure correctly as outlined within Temporary Addendum.	133 (Local Resident)	Council followed the adopted SCI for consultation conducted during Covid and held the consultation for 12 weeks (longer than 6 weeks statutory period). Also, a further consultation earlier this year has provided the opportunity to send representations which will now be dealt with as part of the Examination.

The local plan should not be considered sound, as there is a concerning issue that families on low income and elderly people may not be able to attend an online consultation about the planning of a house near them. Online consultations can be inaccessible to those who do not have access to a stable internet connection or the necessary technology. Furthermore, older individuals who may not be families with digital communication tools may find it challenging to participate in		
familiar with digital communication tools may find it challenging to participate in an online consultation. This lack of accessibility can have a significant impact on the planning process as it may exclude valuable voices and perspectives from the community. It is essential that alternative methods of consultation are also provided to ensure that all members of the community are given the opportunity to participate and have their voices heard. However, during lockdown and the period of COVID, no technological support was given to the elderly population within our community this shows that the valuable elderly voices and low-income		
<ul> <li>within our community this shows that the valuable elderly voices and low-income voices within our neighbourhood were ignored and unable to provide their valuable opinion about the proposed development.</li> <li>The Local plan should not be considered sound as the COVID-19 pandemic has had a significant impact on our ability to interact with others, especially for those who have been required to shield due to underlying health conditions. As a</li> </ul>		
result, the community may not have been able to see their neighbours and discuss opposition to the planned proposal during a vital part in the plan. Face-to- face communication is a crucial aspect of community engagement and consultation, and it can help to foster a sense of community and shared responsibility. However, due to the restrictions imposed by the pandemic, it may not have been possible for individuals to have these conversations, limiting their		
ability to voice their concerns and share their opinions on the proposal. This could have resulted in the exclusion of valuable perspectives and contributed to a lack of transparency and accountability in the planning process. It is important that alternative methods of consultation are used in situations where face-to-face communication is not possible, to ensure that all members of the community are given a fair opportunity to participate in the planning process.		
No consideration has been given from local school or families of pupils attending those schools in close proximity of the proposed site, so recommend that this is	142 (Local Resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement

extended consultation for collaborative feedback [Referring to site 222 "Evington Valley Road (Former Dunlop Works)"]		(SD/11). Site notices were put up and neighbours adjacent to the site notified. An online presentation was made during the 2020 consultation, which was also extended.
The initial draft consultation period during lockdown prevented people gathering in a person (agreed space) to outline the changes mentioned and right to challenge the plans in a fair and democratic manner. It prevented those without access to the Internet or those who are not IT literate to review the information and make a fair representation of their views. I believe this stage of the public consultation is far too complicated and unless someone has a legal understanding and able to break down large policy documentation then people are not able to respond with a fair argument and objection. There has been a lack of direct public engagement and local councillors have not been visiting people in the area to discuss and give clearer advise on changes happening in the local area. The lack of public consultation in a physical location (especially as the initial consultation happened within Covid) I feel we should be allowed to meet and hear first-hand, something that will many of us who will be subjected to all this development in the years to come.	149 (Local Resident)	Council followed the adopted SCI for consultation conducted during Covid and held the consultation for 12 weeks (longer than 6 weeks statutory period). Also, a further consultation earlier this year has provided the opportunity to send representations which will now be dealt with as part of the Examination.
One of the obligations for the council is to conduct a consultation with residents. In this particular circumstance, the consultation has been fundamentally flawed. The consultation took place during 2020, which was the height of the Covid pandemic.	153 (Local Resident)	As above
The particular ward in which I live, Thurncourt, saw a failure to inform residents of the consultation. Much of it was online, but Thurncourt has one of the highest levels of deprivation in the country, with many not having internet access. Thus, residents were unaware of the process, or were unable to get involved.		
The council claims to have informed all households of the consultation in 2020. I was one of over 100 residents at a recent ward meeting (21 February 2023), where we received the first face-to-face meeting with city planners, and the vast		

<ul> <li>majority of those in attendance (myself included) had not received any information about the City Plan prior to that meeting.</li> <li>There should have been some form of mailshot of leafletting to all households in the city, to enable all residents to be aware of the development plans. Having failed to do even this as a minimum for consultation suggests the council has been negligent in seeking the views of residents.</li> </ul>		
The consultation has not been carried out with Council's own 'Statement of Community Involvement and Temporary Addendum. 194 representations received in the LE5 postcode area. Very limited notification given to residents and took place during the Covid lockdown. No online workshops or discussion/presentation took place during the consultation. Only 4 notices were put up around Site 629 "Netherhall Road Open Space". Second round of consultation expects a technical understanding of the process which limits the engagement of residents which has been misleading and confusing for residents.	180 (Netherhall community Association)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Site notices were put up and neighbours adjacent to the site notified. An online presentation was made during the 2020 consultation and every household received a leaflet to notify of the Local Plan. The Regulation 19 consultation followed the nationally prescribed form. However, the Council supported people to complete
No online workshops took place for the Reg 18 consultation, contradicting the SCI Temporary Addendum (June 2020). The YouTube video presentation is not a sufficient replacement. Statement of Community Involvement Addendum dated June 2020 states that online workshops would take place in the 2020 public consultation. This workshop did not take place. Only the following YouTube video presentation took place - <b>Https://youtu.be/tPuiUtV5AfI</b> . This has been described as a webinar	210 (Local Resident)	the form where possible. Online ward meetings were hosted upon request. Leaflets were delivered to every household within the city as well as site notices.

which it was not. No online meeting or webinar took place where people could ask questions.		
Reference to Section 16c of the NPPF. Petition signed of over 400 signatures expressing the unfairness and process of the 2020 Regulation 18 consultation. Many only became aware in ward meeting on 6 <sup>th</sup> December 2022. Consultation in 2020 made the process inaccessible to many sections of the community.	220 (Local resident)	Council followed the adopted SCI for consultation conducted during Covid and held the consultation for 12 weeks (longer than 6 weeks statutory period). Also, a further consultation earlier this year has provided the opportunity to send representations which will now be dealt with as part of the Examination.
The consultation has not been carried out in accordance with LPA's 'Statement of Community Involvement and Temporary Addendum. Barely existent and took place during Leicester's lockdown. Four posters around the site could not be found and were not checked by officers to ensure that they stayed in place. Roads such as Lymington Road, Parkstone Road, Lynmouth Road received no letter. Residents unable to view the Local Plan in libraries or the Council Offices. Feelings of exclusion and alienation of Netherhall residents.	225 (Local Resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Several site notices were put up around the site close to main routes through the site, neighbours adjacent to the site were also notified. The Council distributed copied of the Local Plan to residents where requested and documents contained within the Libraries/Council offices.
Document titled "Statement of Community Involvement (SCI) Addendum" dated June 2020 states: - An online presentation would take place for the "Exhibitions and Presentations" requirement in the SCI and that: An online workshop would also take place for the "Workshop" requirement in the SCI.	238 (Local Resident)	As above. Online ward meetings were hosted upon request.
However, document titled "Summary of Responses to Regulation 18 Consultation" states that only a YouTube presentation		

(https://youtu.be/tPuiUtV5AfI) took place which has been incorrectly described as a webinar. An online workshop did not take place. The document is incorrect in stating that requirements of the SCI were met as no webinar or online workshop where people can interact/ask questions, as per the SCI, took place.		Leaflets were delivered to every household within the city as well as site notices.
An interactive two-way discussion between resident and planner is critical to good consultation, even more so when people are socially isolated during Covid-19 and unable to exchange ideas between themselves. This was not enabled and did not happen. It would not be unreasonable to expect for an interactive online session to have been held which would have been at least inclusive to residents with internet access.		
Residents just wanted a fair opportunity to have meaningful engagement in the Local Plan which did not happen due to its unreasonable timing during Covid-19 pandemic (a National Health Emergency). The Regulation 18 consultation must take place again.		
There do not seem to be any obvious links to the new Leicester Local Plan on your website. It does not come up in a search. I would argue that the consultation period cannot start until such time as this is rectified.	241 (Local Resident)	Consultation was clearly advertised on the Council's website. This was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11) The consultation was promoted through various media formats including social media and through adverts in the Leicester Mercury. QR codes were also included on site notices to allow for ease of access to the consultation.
Initial stages of the consultation process were fundamentally flawed. Substantial evidence that initial stages of consultation did not gain sufficient engagement with local community to assess physical and mental health. No ward meetings took place and not replaced by online meetings.	270 (Local Resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Site notices were put

		up and neighbours adjacent to the site notified. An online presentation was made during the 2020 consultation and every household received a leaflet to notify of the Local Plan.
Fundamentally flawed consultation as it has not taken into account the views and needs of all residents. No letter received and no notices put up, not able to use the internet very well. Unable to walk as far as Willowbrook Park which is the nearest green, need to think about safety and wellbeing and not squeezing in houses.	271 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Site notices were put up and neighbours adjacent to the site notified.
Local plan consultation is totally flawed and disgracefully non-compliant due to the insufficient and inadequate communication with the affected local people. Effects upon the community not been considered.	277 (Local Resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Site notices were put up and neighbours adjacent to the site notified.
No notification about the plans until after the ward meeting in February 2023. No leaflet dropped around the neighbourhood. Ridiculous time to consult and not many people will read the council website in previous consultation. Underhanded way to achieve goals of development to meet government needs. Not compliant due to non-transparency and non-compliance to inform all residents of their intentions. Elderly do not have access to the internet to engage. Planning policy documents no easy to navigate. The form is complicated to deter people from making representations. Under the freedom of information act the plans should have been accessible sooner and the residents would like to know who was meant to inform all and how. Dates and times and a copy of the literature posted.	298 (Local Resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Site notices were put up and neighbours adjacent to the site notified.

The first consultation for it was held during the covid-19 period and was held online. I and many others were not informed of this consultation and therefore was unable to attend it. There was no communication to us about this virtual consultation. we should have been informed through letters or notices outside our home or on the land in question. The councillor Theresa Aldred and Stephen Gee have also confirmed that they were not aware of this virtual consultation.	299, 305, Local Residents	The consultation earlier this year provided the opportunity to comment on local plan which will be considered as part of the Examination.
The second consultation still took place, this time with a large turnout, but we were informed that it was too late to oppose the plans. This is important, as it shows that if we had had proper communication about the first consultation there would have been a large turnout too.		
Now that we aren't as affected by covid-19, an in-person first consultation should be held. this means that older people and others whose first language may not be English will be able to voice their own opinions as the 'first consultation' which was held was online further limiting the people who if they knew about it could attend. I propose that the documentation should also be provided in an easier reading grade to ensure everyone has a fair say in the matter.		
2020 flawed consultation which never happened fundamental issue.	303 (Local Resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Site notices were put up and neighbours adjacent to the site notified.
The first consultation occurred during the Covid-19 pandemic and we were not made aware that this consultation was occurring and therefore could not attend. I am shocked at this, I believe as people who will be directly impacted the most by this, we should have been informed about consultations so we could have put forth our views and concerns regarding this process. Therefore, the process should be repeated and the residents of the neighbourhood should this time be made aware of all consultations that are occurring.	306 (Local Resident)	The consultation earlier this year provided the opportunity to comment on local plan which will be considered as part of the Examination.
Furthermore, the documents are quite difficult to understand, especially given the demographic of the area, and there I think the wording of the documents		

<ul> <li>should be changed so that everyone is able to understand and therefore contribute their opinions.</li> <li>Object to the building on green space. Initially consulted during Covid but at no point were residents of Summerlea Road consulted. No letters were posted, efforts made to consult face to face, seminars or presentations etc.</li> </ul>	307, 308, Local residents	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Site notices were put up and neighbours adjacent to the site notified.
I do not believe the appropriate consultation process for building upon the Brent Knowle Gardens site was followed. During the COVID-19 pandemic, a virtual consultation is said to be held. Neither the local residents nor the two local councillors were aware of this. The building plans were not widely advertised, with many local residents being unaware of the plans. No notices were up in the local area either about the plans. Despite this, the plan progressed to stage 2. Due to the COVID-19 pandemic, I feel the consultation was put through without the due process, to allow it to progress onto further stages. Later information provided suggested that only 11 residents had responded to this consultation. The consultation must be reverted back to the first stage of consultation, as it is clear that progression to Stage 2 of the consultation process was neither legally compliant nor complied with the duty to co-operate. Means for residents to provide appropriate feedback should be provided; i.e., paper copies of the consultation for the elderly who may not be able to access/feel competent in completing an online form. The form to be worded in a way that is accessible for all. The average reading age in the UK is 9 years old and in order to match the GOV.UK's content design guidance standard, the wording should be made clearer to support understanding. Furthermore, given the high level of different nationalities within Leicester city centre, a clear option to have the information in a different language should be provided to allow equal opportunities.	309 (Local Resident)	The nature of the local plan means there is a lot of technical detail, however, documents have been produced and explained as simply as possible. The consultation earlier this year provided the opportunity to comment on local plan which will be considered as part of the Examination.
System failure to ensure the community was adequately engaged during an unprecedented time. No alternative was presented for the usual ward meetings and no special provision made to engage vulnerable groups in particular,	312 (Local Resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement

including those with physical and mental health issues, the elderly, those without Wi-Fi enablement, and those without English as a first language.		(SD/11). Site notices were put up and neighbours adjacent to the site notified.
Consultation was fundamentally flawed and didn't engage people living in the area, especially people who are vulnerable or have mental or physical health issues. Should be run again. Far greater efforts should be made by the council to engage all residents and to understand the impacts to health, social aspects and safety.	313 & 314 (Local Residents)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Groups with protected characteristics were engaged with in consultations on the Plan. Site is proposed for partial development with the rest to be retained and enhanced as open space.
The Local plan is not legally compliant as not everyone in the area or neighbourhood that will be directly impacted by these plans were informed. I live directly opposite to the site and received a letter about 16 days ago. I feel that this not a sufficient amount of time to read through all the complicated documents and be able to send a detailed response. Also, those residents in close proximity to the site, e.g., Drinkstone Road, were not informed at all. It is a very complicated process for many to access and respond in the correct way and therefore I find that the consultation is not conducive to and has not been designed for normal working people and residents nearby to contribute to. Many people will be emailing the planning department their concerns due to their inability to access and make sense of the documents, which the council will disregard. Also, the needs of the Madani school and children from the nearby school who will be directly impacted by this have been excluded from having a say. [Referring to site 222 "Evington Valley Road (Former Dunlop Works)"]	335 (Local Resident), 341 (Local Resident), 347 (Local Resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Site notices were put up at each stage and neighbours notified. Regulation 18 consultation was extended to allow more time for comments.
Evidently being done without consultation for minimum disruption and the production of a form that is difficult to complete is unfair. No notification about the plans until receiving notification from neighbour in February 2023. No leaflets	416, 418, Local residents	Consultation was carried out in compliance with the Council's adopted Statement

were dropped around. Not able to read all of the documentation online during the pandemic and socialise about this. Policy documents hard to read. Breaches with transparency and data protection as this information should have been shared for all surrounding roads to ensure areas that will be affected were included. Under the freedom of information act the plans should have been accessible sooner. The consultation was not advertised lawfully.		of Community Involvement (SD/11). Leaflets were sent to every household in Leicester in 2020 consultation and documentation that was available was posted on the Council's consultation webpage.
Consultation process was flawed as during lockdown and not made aware.	419, 420, Local residents	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
First consultation was fundamentally flawed as it was during covid lockdown and were not contacted.	Local residents: 421, 437, 438, 439, 455, 456	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
Consultation was fundamentally flawed as no notification was given of it to people in the surrounding streets.	423 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Neighbours have been notified at each consultation stage.
Repeatedly stated by local residents during ward meeting that L.C.C. previously had not informed Thurncourt Ward / Croyland Green / Homestone Gardens residents adequately/properly or at all of the proposed 'Central Government Initiative'. Ward meeting not a consultation meeting as already made decision. Suggested that a decision to develop was based upon non-consultation or extremely limited information, dissemination to Thurncourt Ward residents.	424 (Local resident/Independent researcher)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Ward meetings were offered during 2020 consultation and neighbours

		were informed. All documentation available at the time was posted on Regulation 18 consultation website.
First consultation fundamentally flawed.	429 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
Fundamentally flawed.	431 (Local resident)	The Council believes this is in relation to the consultation process which was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
Consultation process was fundamentally flawed, Brent Knowle Gardens should not be considered at any point in the future.	432 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
Consultation process was fundamentally flawed. Consultation not inclusive and not notified.	433 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Neighbours were notified and site notices put up.

Consultation process was fundamentally flawed, not all affected were consulted.	434 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). All properties in Leicester received a leaflet informing of the plan at Regulation 18 stage.
Consultation was fundamentally flawed.	435 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
Consultation was fundamentally flawed,	436 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
The consultation was fundamentally flawed. Don't build on The Green (Homestone Gardens), just because you have planted 10 trees to help with the environment. We will have no-where to park our car. [Referring to site 501 "Croyland Green"]	440 (Local Resident)	The consultation was done in compliance with the adopted SCI.
The consultation was fundamentally flawed, as we didn't know about this or hear anything about it. Do not build on Brent Knowles Garden. [Referring to Site 481 "Brent Knowle Gardens"]	441 (Local Resident)	As above
The consultation was fundamentally flawed. Don't build on The Green, too many vehicles parked already on Homestone Gardens. [Referring to site 501 "Croyland Green"]	442 (Local Resident)	As above
The consultation was fundamentally flawed. Don't build on The Green, (Wintersdale) it is a safe place for my children to play. The consultation was fundamentally flawed, as we didn't know about this or hear anything about it. Do	443 (Local Resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement

not build on Brent Knowles Garden. [Referring to Site 481 "Brent Knowle Gardens"]		(SD/11). Site notices were put up and neighbours adjacent to the site notified.
The consultation was fundamentally flawed, as residents were not notified. Don't build on The Green, (Wintersdale). The consultation was fundamentally flawed, as we didn't know about this or hear anything about it. Do not build on Brent Knowles Garden. [Referring to Site 481 "Brent Knowle Gardens"]	444 (Local Resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Site notices were put up and neighbours adjacent to the site notified.
The soundness of the plan was fundamentally flawed, we were not made aware of any of it.	445, 448, 468, 469, 473, 475, 476, 477, 478, 480, 483, 484, 486, 487, 488 (Local Residents)	Local Plan was consulted on at all stages which were statutory consultations. All the consultations were undertaken in accordance with our adopted SCI.
No consultation at any stage of the plan.	449 (Local Resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11) and residents informed.
Lack of consultation at each stage. There has been no consultation at any stage of the proceedings.	452 (Local Resident)	All consultations have been conducted in line with the Council's adopted SCI
Initial consultation was shoddy and almost non-existent. There has been no consultation at any stage of the proceedings.	453 (Local Resident)	All consultations have been carried out in line with the Council's adopted Statement of Community Involvement (SD/11). Letters were sent out

		to every household in the city during the 2020 consultation, which was also extended to 12 weeks.
Lack of full consultation at each stage.	454 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
The consultation was fundamentally flawed.	456, 457, 458, 459, 489, 490, 491. Local Residents	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
Consultation took place during Covid, counsellors were not reachable at this time and not able to communicate.	467 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Letters were sent out to every household in the city during the 2020 consultation, which was also extended to 12 weeks.
No consultation at any stage.	471, 472, (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
Consultation was fundamentally flawed as took place during lockdown. Forbidden to make contact socially, not informed that the consultation recommenced in September 2020.	479 (Local residents)	Consultation was carried out in compliance with the Council's adopted Statement

		of Community Involvement (SD/11).
Lack of consultation at each stage. Ecosystem will suffer greatly including bats, badgers, bats and foxes, well established trees, flora and fauna.	481 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Letters were sent out to every household in the city during the 2020 consultation, which was also extended to 12 weeks.
Residents were not informed correctly; no leaflet was dropped or letters/notices. Site will have even more traffic	482 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
No one notified us of the plans. [Referring to site 481 "Brent Knowle Gardens"]	485 (Local Resident)	All neighbours were notified of the consultation and site notices put up around the site.
Views are not being respected and the consultation process is not fully transparent. First consultation undertaken during a pandemic and the latest has disregarded previous objections. Promise that no new houses will be built on green spaces in Evington.	493 (Residents of Evington)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). The previous objections were considered in site assessment at Regulation 19. Full details of the Regulation 18 responses are on page 111 of Summary of responses to Regulation 18 (SD/17a)

Petition regarding issues with the consultation.	497 (Petition from 438 Local	All consultations have been
We the undersigned are upset and disturbed over how the first consultation on the local Plan took place while the city was under covid restrictions and call on the Council to restart the consultation, due to lack of public participation and public knowledge that the consultation was taking place.	Residents)	conducted in line with the Council's adopted SCI

### Introduction, Spatial Portrait & Vision

Comments from: 5, 63, 157, 159, 255, 259 (Natural England), 267 (Leicestershire County Council), 279 (CPRE Leicestershire), 282 (Harborough District Council), 316, 318, 331, 333 (Hinckley & Bosworth Borough Council)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response
1. Introduction		
Diagram 1 –. it is suggested that the city boundary on Diagram 1, and all subsequent diagrams, is made clearer and that proposals outside the administrative boundary are faded out or removed.	282 (Harborough District Council),	The Council will consider this as a minor modification.
Diagram 1 - does not include Thorpebury and other established areas for growth in the neighbouring authority areas. It does not therefore align with the extent of the Leicester Urban Area identified by neighbouring authorities.	318 (CEG)	The map shows existing settlements only.
Diagram 1 - Illustrative figures showing the administrative boundaries for Leicester City could be clearer by using a bolder edge relative to those used for other LAs.	331 (Cllr David Bill from Hinckley and Bosworth Borough Council)	The Council will consider making a minor amendment to the boundary
Para 1.3 - it is presumed reference to the Leicester Urban Area should actually say "City of Leicester" (i.e., the administrative area) as opposed to "Leicester Urban Area" which as used elsewhere within this document (and more widely) refers more broadly to areas outside of the city boundary but nevertheless adjoined to/functionally part of the city in a wider sense. It should be clear that the Plan is limited to setting out a strategy for the city and the policies apply to the city only.	267 (Leicestershire County Council), 282 (Harborough District Council)	Minor Modification - change Leicester Urban Area to City of Leicester in Para 1.3 in the plan.
Para 1.4 – The phrase "that the community has signed up to" is highly objectionable, the consultation phases of the Local Plan, do not equate to meaning "that the community has signed up to." Far from it in fact.	69, 87, 88 (local residents)	Propose minor modification to delete words "in ways that the community has signed up to" from Para 1.4 in the plan.

Para 1.12 – LCC has engaged constructively, actively and on an ongoing basis with neighbouring authorities, including HDC, as part of the Duty to Cooperate and particularly in relation to the preparation of the Statement of Common Ground (June 2022).	282 (Harborough District Council)	Comments welcomed.
2. A Profile of Leicester: A Spatial Portrait		
Chapter 2 - The plan as a whole is inadequate in terms of its approach to meeting the housing needs of older people. No reference is made to the growth of the older population of Leicester. Reference to the critical need for older persons housing should be made and an overview provided of how the population in Leicester is going to age over the plan period.	159 (Local resident)	Reference is made to housing for specific groups in paras 2.18 and 5.19. Policies Ho03 "Housing Mix" and DQP03 "Inclusive" aim to meet the diverse housing needs of the city as a whole.
Chapter 2 – any census data from 2011 would benefit from a refresh where possible given the 12-year difference if the relevant data is released prior to adoption.	331 (Cllr David Bill from Hinckley and Bosworth Borough Council)	Note that recent full census data has not been released. The new data from ONS will inform the evidence when it will be updated, as part of the review of the plan.
Would benefit from citations and links to datasets/reports/evidence bases used for ease of access and transparency.	331 (Cllr David Bill from Hinckley and Bosworth Borough Council)	Majority of source of information have been referenced where appropriate.
Some comments, correlations or summaries throughout the spatial portrait are provided without any statistics or evidence to support the claims.	331 (Cllr David Bill from Hinckley and Bosworth Borough Council)	We think there are sufficient sources and references used to provide a snapshot of the spatial portrait of the city, where appropriate.
Para 2.4 – Number of enrolled students is out of date. The statistics referred to cannot be considered 'justified' given they're not referring to the most recent evidence and it is recommended this element of the Plan is updated to reflect the current academic year (2022 – 2023) which for DMU is 22,387 students.	63 (De Montfort University)	The evidence considered was the most appropriate and up to date evidence. Any new data received will be considered as part of the Plan review.

Para 2.7 – In support.	63 (De Montfort University)	Support welcomed.
Para 2.8 – Give more evidence to support the narrative of increasing population and try to avoid cultural stereotyping.	157 (Local resident)	Statistics used in paragraph 2.8 and Figure 2 come from the ONS (2016) as cited in Figure 2.
Para 2.10 – There needs to be more bungalows with off road parking. Flats are not suitable housing for sick and/disabled people. More bungalows need to be built for rent and for sale considering that ¼ of the population is sick/and disabled.	5 (local resident)	Parking needs and requirements are covered in policies DQP06 "Residential Amenity" and T07 "Car Parking". Policy T03 "Accessibility and Development" aims to ensure that new development takes into account the transport needs of people with limited mobility.
		Policies Ho03 "Housing Mix" and DQP03 "Inclusive Design" aims to meet the diverse housing needs of the city as a whole. Policy is informed by proportionate evidence (Local Housing Needs Assessment) which is in compliance with the national guidance.
Para 2.16 – Concerns of overcrowding, further links to the impact of this on health and health services could be made	267 (Leicestershire County Council)	Para 2.16 deals with housing information only. Health issues in the city are covered separately in paragraphs 2.34 – 2.36.
Para 2.22 – Could be expanded to include the links between access to affordable reliable transport and for improving health and socio-economic inequalities.	267 (Leicestershire County Council)	The Council will consider this as part of a minor modification in transport chapter (Chapter 16).
Para 2.23 - Open space and green infrastructure could link to its importance on and benefits to mental wellbeing.	267 (Leicestershire County Council)	Links between open and green space and wellbeing are made throughout chapter 7, specifically paragraph 7.8 and Policy HW01 "A Healthy and Active City", this policy also cross refers to policies DQP01 "Design Principles" (which includes Building for a Heathy Life standards), OSSR03 "Open Space

		in New Development" and T03 "Accessibility and Development"
Para 2.31 - suggested to replace "allocated" by "designated" for green wedges.	333 (Hinckley & Bosworth Borough Council)	Suggestion is accepted and has been included as minor modification AM91 (Document SD/22 Schedule of Proposed Minor Modifications (2023)).
Para 2.33 - could include additional text <i>'and provide climate resilience during heatwaves'</i> .	267 (Leicestershire County Council)	The purpose for inclusion of the additional text is accepted. However, it is felt that the existing wording in the paragraph, i.e., "wider environmental benefits," is broad enough to cover climate resilience during heatwaves.
Para 2.36 - Should be wider acknowledgement of the link between climate change and health outcomes.	267 (Leicestershire County Council)	The Council will consider this as part of a minor modification.
Paragraphs 2.11, 2.12, 2.22, 2.31, 2.33, 2.36 not compliant with national framework	74, 75, 76, 84 (local residents)	This chapter only paints a statistical profile of Leicester city and is not a policy.
3. Vision of Leicester: The Vision		
Vision does not set out aspirations for the natural environment or climate change. It should include an overarching aim to increase and enhance Natural Capital and address climate change so that Leicester can be a green and attractive City where both residents and visitors can benefit from access to nature and a high level of well-being and quality of life.	259 (Natural England)	The Council believes that this is covered by objectives 2, 4 and 8.
The Vision could make reference to preserving and using resources efficiently. The vision is considered to lack sufficient reference to the environment.	267 (Leicestershire County Council)	The Council believes that this is covered by objectives 2 and 8.
Difficult to gain a clear view of what are the key priorities that the Plan addresses. The Vision itself does not refer to Climate Change. This should be rectified to produce a stronger Vision statement by adding the	279 (CPRE Leicestershire)	The Council believes that this is covered by objectives 2 and 8.

following words at the end of a new first paragraph as set out below:		
"The Vision		
A confident city with a reputation as a cosmopolitan, creative and academically rich place, which is successful in combating climate change and enhancing its natural environment and biodiversity.		
A place in which businesses thrive and there is strong sustainable growth in housing, jobs and skills.		
A place where all people who live, work and enjoy the city feel proud to belong to our city and that our city belongs to them."		
3. 3.2: Key Objectives		
Para 3.2 – not compliant with national framework	74, 75, 76, 84, 89 (local residents)	Para 3.2 includes the objectives set out to meet the vision identified in the local plan. These are not policies.
Suggested that there should be a specific objective here that reflects the role of the City of Leicester within the wider Housing Market Area (HMA) / Strategic Growth Plan.	267 (Leicestershire County Council)	The relationship between the city and rest of the HMA has been identified in the overall strategic partnership engagement. A specific objective outlining this is not suitable for Leicester City Local Plan.
I suggest a further objective as follows: "To use brownfield sites, including derelict buildings to deliver part of required growth of new housing and employment."	255 (Cllr Sue Waddington)	This is reflected in the overall strategy for Leicester where about 71% of future growth is proposed on brownfield land. However, the Council will consider emphasising the use of brownfield land in the supporting text within the Plan.
Policy VL01: Presumption in Favour of Sustainable Development		

Policy is redundant as it is a repeat of national policy	316 (Home Builders Federation)	The Council feels that this needs to be
		included due to previous government
		guidance, however if it is decided during the
		course of the Examination, that the policy is
		redundant then the Council will accept this
		as a modification.

### Chapter 4 – Strategy for Leicester

Comments from: 12, 77, 108, 152, 162 (Blaby District Council), 226, 255, 261, 267 (Leicestershire County Council), 279 (CPRE Leicestershire), 282 (Harborough District Council), 289, 291, 300 (Historic England), 311 (Charnwood Borough Council), 316, 317, 318, 326 (Northwest Leicester District Council)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response
In support	282 (Harborough District Council)	Welcomed
Diagram 2 - Shows growth areas/sites that are not committed for development, clarification needed regarding the statuses of these sites and for the graphic to reflect accurate development statuses.	162 (Blaby District Council)	Remove the site in Blaby from Diagram 2
Diagram 2: Need to add the Leicester/Scraptoft/Bushby Green Wedge & change the title to Leicester City.	282 (Harborough District Council)	The Council will consider this as a minor modification.
4.1 & 4.3 – Plan period too short.	317 (David Wilson Homes, Leicestershire Partnership NHS Trust and University Hospitals of Leicester NHS Trust)	Benefits of getting the plan submitted based on current period and evidence outweigh the risks of shorter plan period. Plan will be reviewed in 5 years or sooner.
4.3-4.6 - SGP is now out of date, does not relate to Climate Change or biodiversity and landscape issues and places too much reliance on strategic growth areas and aligning employment land and housing.	279 (CPRE Leicestershire)	These issues have been identified and included in the local plan. Local Plans have to be in alignment with the broad direction of growth in the SGP and address local issues through the local plan.
4.6 - Oadby & Wigston referred to twice / Charnwood is missing in SoCG. Change to HDC in para 5.4.	267 (Leicestershire County Council), 282 (Harborough District Council), 311 (Charnwood Borough Council)	Change proposed as a minor modification.

4.10 - Support for approach, particularly for brownfield land prioritisation in CDA, higher densities and efficient land use to help secure additional housing. Put as 'approaches' or 'elements' rather than 'proposed options'.	282 (Harborough District Council)	Support welcomed. Minor modification noted, Change 'proposed options' to 'approach' in Para 4.10
<ul> <li>4.10 - The first bullet point states' prioritisation of new housing development on brownfield sites in the Central Development Area.' However, this objective should be extended to brownfield sites beyond the central zone.</li> <li>A further objective for new housing should be included. This should provide an objective of working with other stakeholders such as Homes England to use brownfield land in the City for Housing- to bring back into use derelict sites and buildings which stand empty and create problems for local residents.</li> </ul>	255 (Cllr Sue Waddington)	The plan emphasises the use of brownfield land in various sections. However, The Council will consider emphasising this further in the supporting text within the plan as part of a minor modification.
4.10 and 4.11 - Inconsistent with National Policy, plan contains overestimates of housing need and underestimates of supply, includes study about housing need conducted by representor.	279 (Campaign to Protect Rural England – Leicestershire)	City's housing need has been calculated as per the Government's standard methodology. Plan in compliance with national policy.
Paragraph 4.11 - Department for Levelling Up stated that Leicester City had highest number of vacant homes in the East Mids. Please confirm that the possibility of the Council taking possession of these homes and renovating them has been taken into account in calculating the City's unmet need.	12 (Local Resident)	Vacant homes have been considered in the calculation of overall housing need. This has been explained in the Local Housing Needs Evidence February 2022 update. However, it must be noted that the overall housing need is calculated using the standard methodology, which is included in the Local Housing Need

		Assessment UpdateSeptember 2022addendum.City's unmet need has beencalculated on the basis ofanticipated supply whichhas been assessedobjectively on the basis ofStrategic Housing &Employment LandAvailability Assessment andhas also been appraisedthrough the SustainabilityAppraisal.This has been explained inthe Housing SitesMethodology evidence(EB/HO/5) and Housing and
4.13 – Supportive of economic growth projects.	267 (Leicestershire County Council)	Sites Topic Paper (TP/5) Support welcomed.
4.16 - additional objective to promote derelict land.	255 (Cllr Sue Waddington)	The Council will consider emphasising the use of brownfield land in the supporting text within the Plan
4.20 - HDC supports location of these uses in city centre.	282 (Harborough District Council)	Support welcomed.
Paragraphs 4.26, 4.28 and 4.30 - wording of the final sentence should be amended to include reference to other highway authorities.	267 (Leicestershire County Council)	As such covered under infrastructure providers, however the Council will consider adding modification to add 'other

		highway authorities' in these paragraphs
Paragraph 4.32 - reference should be provided to other highway authorities.	267 (Leicestershire County Council)	The Council will consider adding modification to add 'other highway authorities.
Final sentence of 4.32 reference should say site being part of a wider, comprehensive development with the adjacent sites in Charnwood and Blaby.		The Council will consider a minor modification to paragraph 4.32.
Need to refer to the cumulative and cross-boundary transport impacts of these sites on the north-western part of the Leicester Urban Area.	267 (Leicestershire County Council)	Ongoing discussions with the County Council on this matter.
Paragraphs 4.21, 4.22, 4.23, 4.24, 4.25, 4.26 not compliant with national framework	74, 75, 76, 84, 89 (local residents)	Council does not agree with this and considers the Submission Plan is sound and in compliance with national policy.
Policy SL01: Location of Development		
Policy SL01 promotes new office development. No case has been made for additional office space having regard to the large uptake in home or remote working accelerated by Covid. The Campbell Street site is the most suitable location for an excellent bus-rail interchange which could have been used to demonstrate the council's commitment to sustainable transport which is mentioned throughout the Plan but not matched by effective policies or actions. A bus-rail interchange would also obviate the claimed need for a multi-storey car park at the station which would encourage more traffic to drive into the city centre.	226 (Local Resident)	It is too early to monitor the impact of Covid as people are starting to use office space more.
Development concentrated in northwest of Leicester. More focus should be placed on brownfield sites and strategic sites should be more evenly distributed throughout Leicester	54, 68, 77, 78 (Local Residents)	Proposed allocation in plan based on suitable and available sites.

The majority of the proposed strategic developments are concentrated in an area of the city and impacting on boundaries close by: "former Western Park Golf Course, land north of the A46 bypass, and land west of Anstey Lane will be brought forward so that they can provide a readily developable alternative location for new housing". Will have a combined detrimental impact on motorised traffic and associated air quality. Spread the sites across the city.	108 (Local Resident)	The proposed strategy is based on available and achievable sites through the SHELAA assessment.
<ul> <li>Concerns over office provisions relating to deliverability and viability of the two office allocations and consider restricting office development to just two city centre sites is a flawed approach for a number of reasons: -</li> <li>It's too inflexible.</li> <li>Places emphasis on 2 sites may which have potential viability and delivery issues (identified in HENA; table 28).</li> <li>Fails to recognise potential of client's Central Viaduct site and other Waterside sites as being pipeline sites for office development.</li> </ul>	261 (Charles Street Buildings)	Council acknowledges the need for office provision within the City Centre and accepts the proposed additional wording.
Suggest additional wording in SL01, under New Office Development, "This will be provided at Two sites and additional office growth will also be supported within the Waterside Redevelopment Area".		
<ul> <li>In first 2 bullets add "around" in front of 20,000sqw.</li> <li>Add third bullet "Waterside Regeneration Area provides the opportunity to respond quickly to the changing office market and to provide viable and deliverable sites during the plan period"</li> </ul>		
A policy should be given that deals with the cumulative impacts of the remaining 1290 homes, or alternatively, how the impacts of these dwellings will be addressed through the wider/existing policies within the plan. These sites grouped together will have a cumulative impact within an area and could be significant for	267 (Leicestershire County Council)	Leicester and Leicestershire authorities have been working on various pieces of joint evidence as well as a Statement of Common

infrastructure provision (including transport and education impacts). The policy should include reference to other highways authorities.		Ground (SoCG) to address the unmet need within the Housing Market Area. All authorities have signed the SoCG, except Hinckley and Bosworth who will be considering the SoCG end of January 2024.
Reference could be made to public transport accessibility, in order to achieve low carbon/CO2 environments.	267 (Leicestershire County Council)	This is addressed in Chapter 16 "Transportation" of the Plan.
City Centre being designated as a strategic location for housing and the mixture of housing types and higher densities is welcomed. This would support achieving a vibrant city centre and reduce the burden on the city's periphery	267 (Leicestershire County Council)	Support welcomed.
As the proposed housing target of 1,296 homes per annum represents only 53% of the overall housing need, we would encourage Policy SL01 to also support residential development on windfall sites, as well as in the Central Development Area, on strategic sites and allocated non-strategic sites. This will ensure that the policy is positively prepared.	289 (Anchor)	Since the proposed strategy already relies on windfall development, the council can consider adding reference to it in SL01 as a modification.
The plan period should be extended to 2039. This will require the consideration of the scope to accommodate additional housing in the City Council's area and a review of the level of unmet need to be found by other HMA authorities as set out in the Leicester and Leicestershire Authorities Statement of Common Ground relating to Employment and Land Needs, April 2022.	291 (Developer Consortium including David Wilson Homes East Midlands, Bloor Homes East Midlands, Davidsons Developments, Hallam Land Management, Harworth Estates, Jelson Homes, L and Q, Redrow Homes, Vistry Group and William Davis Limited)	Plan will be reviewed in 5 years or sooner after adoption.
Stronger wording in policy is needed with regards to the role of neighbouring authorities in meeting Leicester's unmet need and how Leicester will maintain engagement on this under the Duty to Cooperate.	316 (Home Builders Federation)	This is explained in earlier sections of the plan and does not require reference in SL01.

<ul> <li>The HBF would suggest that the SoCG on Leicester's Unmet Housing Need should confirm that:</li> <li>Each authority in Leicestershire will meet its own LHN and a defined amount of Leicester's unmet local housing need (LHN) (except Leicester City itself).</li> <li>This cumulative figure will be the housing requirement figure for each authority respectively; and</li> <li>The authorities acknowledge that additionality in HLS may be required to ensure deliverability and flexibility.</li> <li>Despite the long history of engagement between Leicester &amp; Leicestershire, the SoCG 2022 does not include any conclusive agreement on the strategic cross-boundary matter of the redistribution of unmet LHN from Leicester.</li> </ul>		This is a joint work between Leicester & Leicestershire authorities and will be updated and reviewed as other local plans are prepared within the Housing Market Area. Leicester City Council cannot amend this document in isolation.
CEG supports the principle in SL01 that development in neighbouring districts will be needed to accommodate Leicester's unmet housing need. For the LLP to be effective, the importance of neighbouring developments should be recognised in Policy SL01 and housing and employment need figures updated to 2039.	318 (CEG)	Support welcomed and noted. Neighbouring housing figures are a matter for individual partners. The Plan period goes up to 2036, the housing and employment figures and plan period will be updated when the plan is reviewed.
CEG generally supports the agreed Statement of Common Ground which sets out how unmet needs in the Leicester and Leicestershire area will be met.		Support welcomed and noted.
The reliance on the Central Development Area in addition to significant annual windfalls builds significant risk into the delivery of the Local Plan housing requirements. The majority of the sites identified in the Central Development Area are brownfield sites, in	317 (David Wilson Homes, Leicestershire Partnership NHS Trust and University Hospitals of Leicester NHS Trust)	Council has a good track record of delivery within the CDA. The city will continue to work closely with

areas requiring regeneration and reliant on high density developments. These sites by their very nature are challenging and viability will be a key issue, recognised by the reduced affordable housing requirements within this area.		stakeholders to facilitate delivery.
This risk should be balanced by sufficient flexibility in the planned provision. Currently the Local Plan sets a target of 20,730 homes over the plan period and identifies provision for 23,010 homes including windfalls. This is an 11% buffer if the unmet need is not taken into account which is not considered sufficient in the context of the risks involved with the supply side. It is suggested that the planned provision should include 15% flexibility buffer to account for the reliance on brownfield, high density, city centre sites in need of regeneration.		Council thinks that 11% buffer is appropriate to take into account any failures or delays in deliverability of sites.
The reliance on neighbouring authorities to deliver 18,694 homes over the plan period is not fully backed up by the Statement of Common Ground, which has not been signed by two of the neighbouring authorities, Hinckley and Bosworth Borough Council and Harborough District Council. This needs to be addressed for this policy to be successful in meeting housing needs. The Statement of Common Ground should be reviewed to take account of the two authorities unwilling to sign the Statement and meet Leicester's unmet needs.		Harborough District Council signed the SoCG in February 2023. Hinckley & Bosworth Borough Council will make a decision in late January 2024.
Plan period not consistent with Para 22 of NPPF.	326 (North West Leicester District Council)	This has been explained in Housing Topic Paper (TP/5). The overall benefit of producing and adopting the plan outweighs the risks of a shorter plan period. Plan will be reviewed after 5 years or sooner from adoption.

<ul> <li>Fails to demonstrate fully housing target in Policy SL01 will be delivered over plan period. More evidence required on deliverability and deliverability rates on sites.</li> <li>CDA sites should be individually identified, and delivery rates supplied, otherwise will be another form of windfall. Concern that without this evidence the unmet need might increase increasing pressure on North West Leicestershire.</li> </ul>	326 (North West Leicester District Council)	Detailed trajectory with site specific details of deliverability and achievability is being prepared and will be submitted as part of submission documents in due course. The CDA has been identified as a single allocation with capacities identified in the CDA capacity study.
Plan fails to demonstrate how the employment land will be met in full which is a NPPF requirement. There appears to be a 15ha shortfall for industrial and smaller warehousing.	326 (North West Leicester District Council)	Council is expecting to submit a Section 73 application for additional employment land within the city to meet the shortfall
In Support. The difficulties associated with accommodating growth needs within the City's administrative boundary are acknowledged and the plan takes a reasoned and pragmatic approach, with clear evidence of cooperation with neighbouring authorities to address unmet need in accordance with paragraph 24 of the Framework.	343 (William Davis Homes Ltd and Chapman Estates Leicester Ltd)	Support noted and welcomed.
Policy SL01 identifies a clear hierarchal approach, which directs the majority of growth to the most sustainable central locations and progresses to identify the most sustainable locations for development beyond the centre, including where cross boundary allocations have the potential to create a critical mass to secure infrastructure delivery and a coordinated approach to planning in locations that are well connected and well related to the City on key radial transport routes.		

William Davis Limited supports the development strategy set out by Policy SL01 insofar as it increases the scope for sustainability located sites to come forward for development, to meet future growth needs across The City.

- The effectiveness of this urban concentration combined with strategic sites approach is widely accepted and proven in the examination of Local Plans nationally; higher housing delivery is achieved by allowing development on a range of sites.
- This approach is recognised to best comply with the critical objective of the National Planning Policy Framework to 'boost significantly the supply of housing' and is a much more efficient and sustainable way of delivering growth, supporting the Government's objective to 'Build, Build, Build, as specified by the Planning Reform White Paper. This approach reduces additional major infrastructure burdens and provides for a wider range of housing.
- Glenfield is an acknowledged sustainable location for growth. The number of homes and pattern of development, with particular regard to land to the west of Anstey Lane, is supported by William Davis Limited and Chapman Estates (Leicester) Ltd. The allocation of increased numbers and spread of new housing, as proposed, will provide more market choice and speed up take-up and delivery.

## Strategic site Allocations (Policies SL02-SL06)

## Policy SL02: Site 702 – Former Western Park Golf Course

Comments from: 27, 30, 33, 34, 36, 38, 39, 44, 45, 46, 47, 48, 49, 50, 51, 53, 54, 55, 56, 57, 58, 60, 64, 67, 68, 69, 70, 72, 73, 74, 75, 76, 77, 78, 79, 83, 84, 86, 87, 89, 90, 91, 92, 93, 94, 95, 96, 100, 101, 102, 103, 104, 105, 106, 108, 112, 115, 116, 118, 121, 124, 126, 127, 129, 130, 131, 132, 134, 135, 137, 138, 144, 145, 146, 147, 148, 150, 151, 154, 155, 157, 160, 161, 162 (Blaby District Council), 163, 172, 201, 202, 204, 205, 207, 219, 221, 222, 228, 230, 231, 232, 234, 236, 237, 240, 243, 245 (Blaby Cllr Roy Denney), 257, 259 (Natural England), 262, 267 (Leicestershire County Council), 280, 282 (Harborough District Council), 300 (Historic England), 302, 304, 328 (Severn Trent Water), 336, 355, 359, 360, 363, 508

Main Issues Raised	Rep ID (name of Statutory Consultee or organisation, where applicable)	Council's response
Not effective use of the space and this is not going to provide a green space for people to access as the government have announced. Too many conflicting proposals incorporated on the site (recycling facility, Gypsy site, housing, factory units).	27 (Local resident)	The Local Plan does carry forward the existing standard of 2.88 ha of publicly accessible open space per 1,000 population (para. 14.15 of Local Plan).
Biodiversity Net Gain will be zero and wipe out endangered species. Loss of green space has increased traffic and pollution and will make quality of life suffer. Already lost separation from M1 motorway with building of mega warehouses, which has caused massive pollution issues.		The proposals on site are the requirement of the strategic policy to meet the identified needs for the city. The site will be master planned in line within Local Plan policies.
Suggested mod to be left as a sanctuary for wildlife and people.		In line with the open space provisions within Policy SLO2 and the local plan requirement for biodiversity net gain (Policy NEO2. Biodiversity Gain), any planning application received for the site must demonstrate that an overall net gain in biodiversity will be achieved.
		Comments from transport and pollution teams have helped to establish the suitability of the site for development. These issues will be

		required to be addressed as part of planning applications.
<ul> <li>Policy SL02 does not comply with NPPF paras 98, 174, 179, 180a, 182 and 185.</li> <li>Health Impact Assessment (2022) not adhered to in respect of due regard to green wedge in masterplan, protecting and enhancing green network, retaining on site pond, impacts to the NHS from lifestyle changes brought about from warmer temperatures.</li> <li>Planning applications should consider trees, air pollution, noises and smell. Impacts to mental health should also be considered. Increased traffic long term and associated health impacts.</li> <li>Neighbouring areas may suffer from negative impacts of construction process.</li> <li>Recycling plant will present impacts to health.</li> <li>Assets of community value to be open and accessible to everyone. Maintenance of a park area for community cohesion.</li> </ul>	30 (Local resident)	It is the Council's view that the policy is in compliance with the policies of the NPPF taken as a whole. Large planning applications will be assessed against policy HW02 'Health Impact Assessments' of the Local Plan. All other concerns raised would be dealt with as part of planning application process and assessed against the policies in the Plan.
<ul> <li>Site and SLO2 not in compliance with NPPF or Health Impact Assessment.</li> <li>Not apparent there is a local 10% Biodiversity Net Gain.</li> <li>Understatement of traffic issues and loss of green wedge in appendix D of the Sustainability Appraisal of the plan (page 6).</li> <li>Health impacts, protection of green network, access to green space, pollution, feelings of belonging all key issues. Impacts are immediate and long term.</li> <li>Key areas of concern have not been addressed in the plan despite numerous objections.</li> <li>Brownfield sites should be considered more seriously.</li> </ul>	33 (Local resident)	It is the Council's view that the policy is in compliance with the policies of the NPPF taken as a whole. All other concerns raised would be dealt with as part of planning application process and assessed against the policies in the Plan. Sustainability Appraisal is a part of the overall site assessment. Any impacts (e.g.,_Traffic issues, green wedge impacts) will be dealt with through mitigations through the planning application process. This site is in a location which is deemed
		sustainable and where the benefits to the city through allocation of the land outweighs the

		<ul> <li>benefits of retaining the land as undeveloped green wedge.</li> <li>The plan has gone through several stages of statutory consultation and comments have been taken into account.</li> <li>71% of new dwellings from proposed allocations will be on brownfield land.</li> </ul>
Local plan is unsound as consultation was fundamentally flawed as the council chose to ignore views that were sought. The area received the most objections than any other area, 541 objections and a petition of 3000+. The Council removed some of the green wedge land without consultation.	34 (Local resident)	The plan has gone through several stages of statutory consultation and comments have been taken into account where relevant between Reg 18 and Reg 19.
Development of Optimus Point was based on contingent of retaining this green wedge land, which contravenes NPPF paras 39, 174, 179, 180).		
The statement in para 1.10 is not credible because destruction of an established green space with diverse wildlife, fauna and flora, and substantial mature trees and hedges is not consistent with the spirit and substance of a Sustainability Appraisal.		Optimus Point is within Blaby District. The Sustainability Appraisal has adequately assessed these. on this site on a much wider set of criteria including social and economic objectives.
The council has failed in its Public Health Impact Assessment as the Western Park Golf Course acts as a Carbon Dioxide barrier between Optimus Point and Glenfield. Does not meet with NPPF paras 39, 98 and 174.		An overall Public Health Assessment has been done and published alongside the Plan, and the council thinks the plan is in compliance with national policy.
Statement in para 1.11 is flawed as Council have not properly understood air quality degradation from Optimus Point and M1.		Para 1.11 lists the other city-wide plans and strategies that have informed Leicester Local Plan.

	The Plan is in compliance with NPPF and Para 2.31 refers to open spaces that were allocated in 2006.
Para 2.31 is misleading as not reliable data – Western Park Golf Course had green wedge designation removed in 2007, which contravenes NPPF para 174.	The plan is in compliance with NPPF and Para 3.2 takes an overall view of the objectives identified to meet the overarching vision.
Para 3.2 incorrect and misleading as does not tackle climate change by destroying largest natural carbon capture site in Leicester, which contravenes NPPF para 174.	The objectives identified in the plan have to be balanced and met through site allocations as well as enhancing the environment in order to meet the overarching vision. The Council thinks that a robust and proportionate Sustainability Appraisal has informed the plan at all stages.
Para 3.4 quotes about improving environmental conditions but site allocation does not improve this, which contravenes NPPF para 174. Not meeting environmental sustainability identified in para 4.2, contravenes NPPF para 174, 179, 180.	All options of sites have been assessed.
	All development will have to meet the 10% BNG requirements and this will be assessed as part of planning application. This will be done through masterplanning.
SA process is flawed as it ignored previous objections, contravening NPPF paras 98, 174, 179 and 180.	A robust and proportionate Green Wedge Review has informed the site allocations.
	Details of any proposed HWRC development on the site will be assessed against Policy FMWN01. New Waste and Existing Waste Uses

The Council have not prioritised brownfield sites when allocating this site and goes against environmental credibility claims by the council. Para 4.13 also stipulates economic growth projects that are not compatible with air quality aims. Failure to protect green network. Destruction of biodiversity against Environment Act 2022. Contravenes NPPF paras 174, 179, 180 and 182.

Development of WPGC will not achieve BNG by building on 90% of current green space. No measures in the Local Plan to "protect and enhance a valued landscape", "a site of biodiversity" and "a site of identified quality".

Reference in Green Wedge review (2017) and addendum (2020) to adjoining green wedge in Blaby District which has been developed into Optimus Point. The council has perverted the view stating the remaining green wedge has reduced in importance because of the loss of Green Wedge for the Optimus Point development. However, this should be the other way around. The Green Wedge status remains in place until the inspector improves the plan, The city council has prevented rewilding of the site through regular maintenance.

No detailed policy for minerals and waste and a Household Waste Recycling Centre shouldn't be on the same site as housing due to noise, smell, pollution, and health concerns. This contravenes NPPF paras 179 and 180.

The development is against the Climate Emergency Strategy. Contravenes paras 174, 179, 180 and 182.

Development of the former golf course will increase water runoff and flooding. Contravenes NPPF paras 39, 98, 174, 179, 180 and 182. (Document SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)) to ensure that the local area can accommodate the proposed waste use and that any impacts on residential amenity can be adequately mitigated. The Council believes that this is allocation is in compliance with the NPPF.

The Plan has been informed by aims of other city-wide plans including the Climate Emergency Strategy.

This has been assessed and identified as mitigations to be considered at planning application stage.

This site is in a location which is deemed sustainable and where the benefits to the city through allocation of the land outweighs the benefits of retaining the land as undeveloped green wedge. Health and well-being have been addressed separately within the Plan.

Building on WPGC has impacts on people's ability to exercise outdoors and connect with nature and contradicts para 72. And NPPF paras 174, 179, 180 and 182. Health and wellbeing strategy 2019-2024 has four objectives including air		
quality and active design which have been ignored.		
Policy SL02 does not comply with NPPF, paragraphs 98,174,179,180a,180c,182 and 185	36 (Local resident)	The council thinks the plan is in compliance with national policy.
Site allocation does not meet with paras 98, 174, 179, 180a and c, 182 and 185. States that we have a duty to protect and enhance the natural environment – the site has many ancient trees (TPO'd trees, ponds with newts and other wildlife. Area of open space for walking.	38 (Local resident)	The council thinks the plan is in compliance with national policy. The site will be master planned and constraints will be mitigated at planning application stage.
Policy does not comply with NPPF paragraphs 98,174,179,180a,180c,182,185.	39 (Local resident)	Addressed and responded to above (in Rep ID
Should prioritise housing on brownfield sites.		34).
More consideration needed for air quality, noise, smells, nature and trees.		
Does not meet with Health Impact Assessment (2022).		
Previous plan did not include recycling plant now proposed.		Reg 19 has provided an adequate opportunity to comment on this.
Schools, Doctors and other services are not equipped for extra people in the area.		Infrastructure has been addressed through whole plan Infrastructure study.
Plan has not provided any documentation for allocation of waste sites or a Leicester Waste and Minerals Local Plan. The recycling centre was not mentioned in the Regulation 18 Local Plan. Local Plan para 17.5 states there is sufficient capacity for waste processing up to 2036 so questions why an additional site has been allocated. Policy FMWN01 specifies that new waste	44 (Local resident)	The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit

development should be built on brownfield land where possible, no evidence to show why this should be on SL02.

Policy SL02 and paras does not comply with NPPF paragraphs 174a, b, d, e & f, 175, 179a & b, 180a & c, 182, 185a, b & c, and 182 due to the impacts on habitat sites. Appendix C2 of the SA, Green Infrastructure Strategy (2015-2025), Appendix D of the SA and Transport Infrastructure Addendum (2022) are referenced for negative impacts.

Removal of green wedge to have impacts to health, a contribution to an obesogenic environment mentioned in Health Impact Assessment, air quality, increased traffic movement. Mitigation of electrification of national transport infrastructure are unrealistic targets and will not be seen in the timeframe of the Local Plan.

Impacts to woodland and wildlife contrary to sections 13-15 of NPPF and it is unclear how BNG will be achieved on site.

Local Plan policies SL02-SL06 show that all large developments have been concentrated in NW Leicester.

Disruption and dysfunction to local transport infrastructure will have significant impacts to residents and environment.

Queries why other areas of the county are not taking on large developments.

representations. Details of any proposed HWRC development on the site will be assessed against Policy FMWN01. New Waste and Existing Waste Uses to ensure that the local area can accommodate the proposed waste use and that any impacts on residential amenity can be adequately mitigated. The Council is committed to preparing a new Waste and Minerals Local Plan.

Mitigation of electrification of national transport infrastructure is outside the remit of the local plan.

The council is of the opinion that the plan is in compliance with national policy and has been informed by robust and proportionate evidence.

Physical constraints have been considered as part of site assessment and mitigation.

The council thinks that plan is in compliance with national policy. BNG will be required to be met as part of development.

Site allocations proposed have been assessed from sites submitted through the SHELAA and have been assessed consistently.

This will be considered more in detail at the planning application stage.

This is outside the remit of Leicester Local Plan.

Title deed references LT397869 and LT25863 have restrictive covenants and possible development restrictions.	45 (Local resident), 46 (Local resident)	
<ul> <li>Proposed development is contrary to Leicester City Councils Climate</li> <li>Emergency Strategy September 2020 and Government's Environmental</li> <li>Improvement Plan (announced in January 2023). Development causes</li> <li>destruction to green space, nature, trees. Does not adhere to the principles set</li> <li>out in aim for clean air in Leicester's Climate Emergency Strategy: April 2020 to</li> <li>March 2023.</li> <li>Trees on the site will store carbon and reduce risk of flooding.</li> <li>Green space is vital for health and wellbeing of local community.</li> <li>The land should be left to be rewilded to support carbon capture and</li> <li>biodiversity.</li> </ul>		The Plan has been informed by aims of other city-wide plans and strategies including the climate emergency strategy. Any forthcoming application will have to satisfy policies DQP04 Landscape Design; CCFR06 Managing Flood Risk and Sustainable Drainage Systems (SuDS); OSSR03 open Space in New Development. the climate change policies of chapter 6 as well as Policy NE02 Biodiversity Gain. The selected Site Allocations are a mix of greenfield and brownfield.
Alternative brownfield sites should be developed.		
Policy SL02 does not comply with NPPF paras:	47 (Local resident)	The council considers that the plan is in
119 due to the impact to the existing parkland and brownfield sites that exist and detract from the city.		compliance with national policy.
98 – due to no other local accessible natural green space to Glenfield.		
174 due to 3.48Ha out of 52.1Ha of grassland being provided.		
180 due to the number of trees on the site in need of protection.		

<ul> <li>Policy SL02 is not consistent with Health Impact Assessment (2022).</li> <li>Contradicts para 40 of HIA which will severely reduce the land available for recreation in area.</li> <li>The site is accessible without use of the car and SL02 will serve to reduce the probable, long term physical and mental health benefits to residents of this existing open space.</li> </ul>		
Questions how decimating a site with important wildlife meet with the declaration about the climate emergency. Survey needs to be carried out by an experienced independent ecologist. Duty of care to provide areas of recreation and access to nature for people's wellbeing. This should have concern for future generations.	48 (Local resident)	Any forthcoming application will have to satisfy policies DQP04 Landscape Design; CCFR06 Managing Flood Risk and Sustainable Drainage Systems (SuDS); OSSR03 open Space in New Development. the climate change policies of chapter 6 as well as Policy NE02 Biodiversity Gain. The selected Site Allocations are a mix of greenfield and brownfield.
Existing brownfield sites would be better to build on than destroying this site.		
<ul> <li>Policy SL02 does not comply with NPPF paras 98,174,179,180a and c 182 and 185.</li> <li>Concerns around traffic congestion, noise, congestion, air quality, green wedge loss, woodland, pond and wildlife impacts, loss of settlement separation.</li> <li>Smells, pollution and rodents around Household Waste Recycling Centre.</li> <li>Health impacts and damage to environment.</li> </ul>	49 (Local resident)	The council considers that the plan is in compliance with national policy. Any forthcoming application will have to satisfy policies DQP04 Landscape Design; CCFR06 Managing Flood Risk and Sustainable Drainage Systems (SuDS); OSSR03 open Space in New Development. the climate change policies of chapter 6 as well as Policy NE02 Biodiversity Gain.

	1	-
Unsound as does not comply with NPPF paras 98,174,179,180a,180c,182,185.	50 (Local resident)	The council considers that the plan is in
Allocation goes against all pre raised comments.		compliance with national policy.
Strongest measured biodiversity and passes all four tests of the green wedge. Development should not alter the integrity of habitat sites.		Any forthcoming application will have to satisfy policies DQP04 Landscape Design; CCFR06
Measures needed to reduce traffic emissions and levels. Green areas, trees and countryside to remain for the local people and to manage flood risks.		Managing Flood Risk and Sustainable Drainage Systems (SuDS); OSSR03 open Space in New Development.
HIA states to encourage active lifestyles and local plan goes against this.		the climate change policies of chapter 6 as well
Priority should be for new housing on brownfield sites and access should be provided or new residents to green space.		as Policy NE02 Biodiversity Gain.
Air quality will significantly reduce with new Household Waste Recycling Centre, and these are on the same side as Leicester.		The selected Site Allocations are a mix of greenfield and brownfield.
Retention of onsite ponds for education and walkers, children.		
Concerns over more people meaning more public transport need and more personal transport on roads.		
Green space availability is to be considered in new developments.		
Objection to the loss of green wedge, in particular to paragraph 1.4 which states that the community has signed up to the plan as an investment, as this has not been accepted for Western Park Golf Course.	51 (Local resident)	Where green wedges have been de-designated in total or in part, these have been in locations which are deemed the most sustainable and
Loss of all green wedge means separated areas of Glenfield and Kirby Muxloe lose identities. The site has the strongest measures of biodiversity and meets all 4 functions of green wedge, Number of species live in the area.		where the benefits to the city through allocation of the land outweighs the benefits of retaining the land as undeveloped green wedge. Reasons for revising green wedge boundaries
Objection to environmental impact, health quality and the negative effect on local services and infrastructure. Uses would remove unique area for walkers, cyclists and those with respiratory issues which have poor air quality.		can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
More cars and HGVs would not minimise carbon emissions which does not improve health of anyone living nearby.		When a planning application is received for the site, the open space provisions within Policy
Nearby primary schools and GP surgeries at capacity.		SL02 and the local plan requirement for biodiversity net gain (Document SD/2 Leicester

Considerations of Health Impact Assessment have not been considered in policy SL02. Development would see an end to experiencing wildlife on doorstep including common and protected species. Highways access and inevitable increase of volumes of traffic and safety issues around the site. Scudamore Road is already severely congested, RAG score for development is particularly high. More traffic will head into Glenfield village. No guidance made for the allocation of waste site, Leicester Waste and Minerals Local Plan needed before site allocation. The HWRC was not listed in the Regulation 18 Local Plan. No documents available to confirm how SL02 complies with FMWN01. Health Impact Assessment highlights the health impacts of waste sites, including smells and undesirable buildings.		Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023), policy NE02. Biodiversity Gain) will ensure that an overall net gain in biodiversity will be achieved. Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site. The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations. The Council is committed to preparing a new Waste and Minerals Local Plan. The proposed waste allocation is on brownfield land.
Local Plan needs to be revised in consideration of NPPF paras 98 174 179 180a 182 and 185. Reasons cited include loss of green wedge, air and noise pollution, biodiversity, more traffic on site.	53 (Local resident)	The council considers that the plan is in compliance with national policy.
Green Wedge Review and addendum supports the former golf course as a green wedge which meets all four functions of the green wedge. Development will eliminate character of green wedge.	54 (Local resident)	Where green wedges have been de-designated in total or in part, these have been in locations which are deemed the most sustainable and where the benefits to the city through allocation of the land outweighs the benefits of

Significant number of objections put forward during Regulation 18 consultation which have been ignored. A household waste recycling centre has been added in since Reg 18 consultation.

Policy NE02 states the need to meet 10% Biodiversity Net Gain, however it is difficult to see how this can be achieved. Appendix D of the SA shows that it is difficult to achieve with indicated being available possibly offsite.

Statement in SA Appendix D about balancing health and green wedge. Local Wildlife site status unbalanced as will have a strong negative health impact on residents. Access to open space will be impacted. Air pollution from The M1 and increased traffic from industries will inevitably be worsened.

Strategic sites SL02-SL06 are all concentrated in the Northwest of the city, these sites should be distributed more evenly. Brownfield sites have not been considered as an alternative.

retaining the land as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).

The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.

Details of any proposed development on the site will be assessed against Policy NE02. Biodiversity Gain, Policy OSSR03. Open Space in New Development, Policy T01. Sustainable Transport Network, and Policy T02. Climate Change and Air Quality (SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)) at application stage.

There are extremely limited opportunities for the council to provide large scale strategic allocations within the city. All sites have been subject to Sustainability Appraisal process (Document SD/4 Sustainability appraisal of the Reg. 19 Leicester Local Plan (September 2022) and Appendices), as well as a comprehensive site assessment process.

The Local Plan prioritises new housing development on brownfield sites in the Central

		Development Area, which is planned to accommodate 6,286 dwellings, which is c. 30% of the city's planned housing provision, over the course of the Local Plan period (Table 1, pp.49- 50 of Document SD/2 Leicester Local Plan 2020- 2036 Submission (Regulation 19 publication) Plan (January 2023)).
<ul> <li>14.10 states that the Former Western Park Golf Course site no longer has green wedge status. This will remain in place until the examination takes place. If the green wedge is removed and developed this will without doubt cause the merging of settlements and loss of community identity.</li> <li>Questions how development of green wedge in the green wedge review (2017) is sound and in keeping with the NPPF. Loss of green wedge for recreational use and loss of access to green wedge/green space.</li> <li>The list of issues listed under para 1.8 of the green wedge addendum (2020) all contravene the NPPF paras 174, 175, 179, 180, 182, 185. Loss of green wedge will remove access to the community as an important part of green infrastructure, loss of the importance of flood protection, Immense benefits to air quality compared to other areas close to busy roads as it contributes to reduction and absorption of air pollution, SL02 green wedge has massive wildlife benefits, and no net gain can be made with the development of such a huge green wedge.</li> <li>Habitats Regulations Assessment in complete contradiction with what policy SL02 is doing. This will remove the green wedge status which will cause the merging of settlements, removal of a highly important recreational resource and will force people to travel further afield, travelling further will cause more air pollution which will reduce air quality.</li> <li>Waste Recycling Centre will massively impact on air quality within the area</li> </ul>	55 (Local resident)	<ul> <li>Where green wedges have been de-designated in total or in part, these have been in locations which are deemed the most sustainable and where the benefits to the city through allocation of the land outweighs the benefits of retaining the land as undeveloped green wedge.</li> <li>Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).</li> <li>The council considers that the plan is in compliance with national policy.</li> <li>The Habitats Regulations Assessment relates to European sites, none of which are in Leicester.</li> <li>This document acknowledges that development of the Former Western Park Golf Course is likely to cause more trips to European sites, but assesses that impacts are unlikely to cause a detrimental impact. See p.31 of HRA (SD/6).</li> <li>Details of any proposed HWRC development on</li> </ul>
with concerns over noise, smells, flies, and loss of air quality. Used to live nearby to another recycling facility and had constant issues of smells and noise which they felt were not addressed by Biffa, the Environment Agency, or the		the site will be assessed against Policy FMWN01. New Waste and Existing Waste Uses (Document SD/2 – Leicester Local Plan 2020- 2036 Submission (Regulation 19 publication)

<ul> <li>Council. Reports of reduction in overall health. HWRC's cannot be placed anywhere near residential properties.</li> <li>Appendix C2 of the SA does not state the cost of maintaining (mowing grass) of site 702 and no mention of budgets. However, the Council's maintenance and management page it talks of stopping maintaining to encourage wildlife.</li> <li>Minimal maintenance would be required.</li> </ul>		Plan (January 2023)) to ensure that the local area can accommodate the proposed waste use and that any impacts on residential amenity can be adequately mitigated. It is beyond the remit of the SA to assess the cost of site maintenance.
Development of the site goes against LCC's mandate for aiming towards their green wedge targets in all respects, it would make air quality and mental health much worse. Reasons for this include: green wedge removal, increased vehicle usage increasing carbon monoxide, removal of established trees, reduction of community access to open/greenspaces, recycling centre added after the objections closed, traveller site previously turned down and another within ½ mils of boundary, against LCC planning applications considering affects to health, non-promotion of walking and cycling, increase in crime, danger of road traffic accidents, missing the opportunity to rewild the site, loss of wildlife.	56 (Local resident)	Details of any proposed development on the site will be assessed at application stage against relevant policies in the local plan (SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)) that address the listed concerns. The council considers that the plan is in compliance with national policy.
Policy SL02/702 does not comply with many aspects of the NPPF.		
The site is in green belt that shouldn't be built on. Very few accessible green belts land within walking distance of Glenfield.	57 (Local resident)	Leicester City does not have a green belt.
Many brownfield sites that can be developed in order to meet the housing needs of the city.		The Local Plan prioritises new housing development on brownfield sites in the Central Development Area, which is planned to
Aim by LCC to lower pollution levels but according to Glenfield Neighbourhood Plan over 50% of Glenfield is paved over.		accommodate 6,286 dwellings, i.e., c. 30% of the city's planned housing provision, over the
Reduced natural habitat of wildlife caused by developments.		course of the Local Plan period (Table 1, pp.49- 50 of Document SD/2 Leicester Local Plan 2020-
Lack of facilities for schools, dentists and doctors.		2036 Submission (Regulation 19 publication)
Large industrial units sitting empty at Optimus Point and further businesses along Scudamore Road will become vacant or move elsewhere.		Plan (January 2023)). The area of coverage of the Glenfield
Pollution levels in Glenfield are unacceptable due to high pollution from the M1 and frequent queues at Junction 21 and 21A. Prevailing winds are bringing noxious fumes to Glenfield. More vehicles and lorries will travel through or		Neighbourhood Plan is within Blaby District, not the city.

close to the village which will increase fumes. Public transport is either non- existent or unreliable. Parish Council is encouraging the planting of trees.		Details of any proposed development on the site will be assessed at application stage against relevant policies in the local plan (SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)) that address the listed concerns.
<ul> <li>Vast amount of trees provide much needed air quality and we need to protect open spaces and wildlife.</li> <li>Development will significantly damage the climate with more air pollution and reduced air quality (from both traffic increase on Scudamore Road and the proposed recycling centre), increase in congestion.</li> <li>Creation of industrial units that are not needed as already vast number of empty units on Scudamore Road.</li> <li>Questions the formula that states that the high scoring green wedge is of less value than this development opportunity and justification behind it.</li> <li>Questions need for Gypsy traveller site when 1999 planning application was refused for temporary G&amp;T use. Also, no need for another nearby.</li> <li>Flooding will be major issue with recent development already contributing to flooding issues.</li> <li>Concern that development will destroy all wonderful wildlife in area, evidence of badgers on site which are protected under 1992 Protection of Badgers Act. Several other species evident on site including great crested newts, birds of prey and other flora.</li> <li>Does not see how Leicester was once an Environment City.</li> <li>Objection to the site and cites the highest amount of objections in the last consultation.</li> </ul>	58 (Local resident)	Details of any proposed development on the site will be assessed against Policy DQP04. Landscape Design, Policy NE02. Biodiversity Gain, Policy OSSR03. Open Space in New Development, Policy T01. Sustainable Transport Network, and Policy T02. Climate Change and Air Quality (SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)) at application stage. The green wedge has been proposed for de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining the land as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023). The city's need for Gypsy and Traveller pitches was identified in the 2016 GTAA (EB/HO/2). The proposed allocation at Western Park Golf Course is for 7 Permanent Pitches to fulfil that identified need.
		the site once a planning application is received

		in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
Objects based on: WPGC provides an area of natural beauty and recreation for local residents. Only space in area with space for wildlife, ecology, and wellness for local residents. Area surrounded by major roads and Optimus Point Development will put an end to hope of breathing in any clean air. Inclusion of traveller site will increase crime. Covering of the site will provide no separation between the villages and the city.	60 (Local resident)	Details of any proposed development on the site will be assessed against Policy DQP04. Landscape Design, Policy NE02. Biodiversity Gain, Policy OSSR03. Open Space in New Development, and Policy T02. Climate Change and Air Quality (SD/2 Leicester Local Plan 2020- 2036 Submission (Regulation 19 publication) Plan (January 2023)) at application stage. The city's need for Gypsy and Traveller pitches was identified in the 2016 GTAA (EB/HO/2). The proposed allocation at the Former Western Park Golf Course is for 7 Permanent Pitches to fulfil that identified need.
Objection as site 702 has had the largest number of responses from the local community than any other area with over 2000 signature petition and a protest against development. No evidence that previous consultation has been taken into consideration. Badgers on site that are subject to Protection of Badgers Act 1992. Plans for site are not a 'last resort' so the development contravenes this legislation. Legislation for bats that are on sites dictates that any structure or place should be protected from damage or destruction. Policy SL02 does not comply with NPPF paras 98, 174, 179, 180 a & c, 182 or 185. Need for greenspaces, trees and wildlife to be protected and encouraged to flourish. The rich diversity of wildlife is vital to the environmental health of the local area.	64 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). The previous objections were considered in site assessment at Regulation 19. Full details of the Regulation 18 responses are on page 111 of Summary of responses to Regulation 18 (SD/17a). It is the Council's view that the site allocation is in compliance with legislation and with national planning policy.
Doesn't agree that need for development is greater than the need for green space. Questions what the council will do when all green space is used up. High amount of use for the green space by different groups for exercise with		Details of any proposed development on the site will be assessed against Policy NE02. Biodiversity Gain, Policy OSSR03. Open Space in

significant positive effects on mental health. Questions whether the Council have considered Public Health England 2020 report).

States that many houses in Leicester and Leicestershire are unaffordable forcing younger families to buy elsewhere.

Development will cause additional traffic, noise and light pollution an**d** reduction of green space availability.

Removing the natural site will have detriment to Glenfield area and its residents producing environmental health and flooding risks. Soil largely made up of clay which absorbs a large amount of water, development would increase flooding.

Rubbish, pollution, anti-social and criminal activity is often associated with Gypsy & Traveller pitches, previously LCC refused a planning application for use as this on site. Recycling waste centre will have negative impacts on air quality, noise and traffic in and around the area.

Site identified to potentially have a Roman road running through it and whether this has been taken into consideration in development plans.

Glenfield locals have petitioned for the site to be rewilded, but this has been denied by the Council on the grounds of maintenance expense, only maintenance that has been carried out is unnecessary mowing and removal of trees which is in the interests of developing the site. Representation refers to rewilding Porthkerry, Northbrook in Exeter and Waterhall Gold Course in Brighton as examples of old golf courses that have been left to rewild,

Plan states that the site is not in green wedge area, but this is in direct competition with Appendix B in Sustainability Appraisal. This is an open area which separates settlements and the last remaining green space in Glenfield. States that the policy is not compliant with NPPF paras 98, 174, 179, 180 a & c, 182 or 185.

No documentation available to show SL02 complies with policy FMWN01 which states that new waste development areas should be built on brownfield land.

New Development, and Policy T01. Sustainable Transport Network (SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)) at application stage.

A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).

The city's need for Gypsy and Traveller pitches was identified in the 2016 GTAA (EB/HO/2). The proposed allocation at the Former Western Park Golf Course is for 7 Permanent Pitches to fulfil that identified need.

The site is currently in a green wedge, which is proposed to be de-designated in the Local Plan. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).

It is the Council's opinion that the proposed waste allocation complies with Policy FMWN01. New Waste and Existing Waste Uses as the key driver of the policy is that Leicester can meet its future waste needs.

The Local Plan prioritises new housing development on brownfield sites in the Central

Objection to para 1.4 in plan as it states that the community have signed up to the plan, however previous objections have been ignored. No indication as a resident of Glenfield that Blaby District Council have agreement with LCC to develop the site. Representor believes that existing brownfield sites should be built on with social and affordable houses before greenfield sites are built on. Site should instead be put forward as part of Government's pledge to create 400,00 hectares of nature areas and 500,000 extra hectares of wildlife rich habitat proposed by Natural England.		Development Area, which is planned to accommodate 6,286 dwellings, i.e., c. 30% of the city's planned housing provision, over the course of the Local Plan period (Table 1, pp.49- 50 of Document SD/2 Leicester Local Plan 2020- 2036 Submission (Regulation 19 publication) Plan (January 2023)).
Objection based on the need to leave the site to rewild. Cites that numerous old golf courses have been left to re-wild which does not increase the maintenance costs, cited as a reason within appendix C2 of the Sustainability Appraisal. Wildlife should be allowed to flourish.	67 (Local resident)	It is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining the land as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
Para 4.38 in Green Wedge Addendum (2020) refers to an adjoining green wedge in Blaby which has been previously developed. Planning permission was granted on appeal by the inspector for Optimus Point employment area and Glenfield Park residential area. Summaries with green wedge addendum and review (2017) take the view that the green wedge has reduced in importance but has the view that this has given the green wedge a greater status. Paras 4.24 states that the green wedge is a 'wider piece of land' and 4.26 listed as 'the surrounding green wedge.' Claims that these have opposing aims in that one declares a regard for the surrounding green wedge and the other states the intention to develop it with the assistance pf neighbouring Blaby. Green wedge review (2017) and addendum (2020) are supportive of green wedge and do not underpin policies in plan for the deletion of green wedges. Land no longer has green wedge status and land within these parcels that remain undeveloped will be designated as open space. No evidence has been presented to show that the strategic site opportunity outweighs the green wedge allocation as stated in the Strategic Site allocations document (2022).	68 (Local resident)	The green wedge has been proposed for de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining the land as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023). The benefits that this proposed allocation provides towards meeting the city's housing and employment land needs outweighs the negative scoring in the Sustainability Appraisal.

The Sustainability Appraisal marks this site as performing poorly and is the highest scoring site of the listed sites with great deal of existing biodiversity. Encouragement for the Inspector to visit the site to familiarise with vital part of green wedge.

NPPF paras 92c, 98, 99 and 100. Believes that the development will have significant impacts on health and wellbeing. Significant impacts identified in Sustainability Appraisal including negative affect on green wedge and Local Wildlife Site, requirement for natural resources for development and significant amount of vehicle movements, the overall SA RAG rating as red. Health Impact Assessment (2022) supports the Green Wedge and Wildlife site and not the proposed development, as referenced in several statements. Statements include 'Prioritisation of new housing developments built on brownfield sites in turn preserving useable green space', 'consideration of air quality, noise, traffic, recreation and access in renewable and low carbon energy projects – holistic assessment on factors impacting health' and 'Preservation of green space (green wedges and open space) and sports facilities – benefits related to increased physical activity and mental health and wellbeing'. Further detail of all of the statements listed in HIA as the basis for the objection are listed Representation 2 of the full representation.

Paras 2.11, 4.7, 4.24 & 4.26 do not comply with NPPF paras 174a, b, c, d, e & f, 175, 179 a & b, 180a & b, 182, 185a, b & c. The plan is likely to have significant effects on Habitat sites. Cited Sustainability Appraisal Appendix C2 for biodiversity comments, Green Infrastructure Strategy (2015-2025) for the opportunities on page 106 and negative impacts within Sustainability Appraisal Appendix D. Plans for the FWPGC will have a significant effect on the habitats site. Finds that the statement about 'new housing being good for health; but negatively affect a Green Wedge and Local Wildlife Site' unbalanced as green wedge and LWS would be eliminated and that cites that Green Wedge and LWS should be good for health. Suggestion that stating that Biodiversity Net Gain could be 'potentially be achieved offsite' indicates the difficulty to achieve this on site. Concern that significant amount of vehicles pose a significant threat to noise and air quality. Practice of protection of onsite ponds and run off prevention will be difficult to achieve and other wildlife

It is the Council's view that the site allocation is in compliance with national planning policy.

The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.

Regarding the locations of the strategic sites, there are extremely limited opportunities for the City Council to provide large scale strategic allocations within the city boundaries. All sites have been subject to the Sustainability Appraisal under threat. Intention to extend into Blaby will eliminate possibility of biodiversity links.

No agreement that the 'community has signed up to the plan mentioned in para 1.4.

Objection to the allocation of the Recycling Centre a this has been added prior to the Leicester Waste and Minerals Local Plan being available. This was added in after the Regulation 18 Local Plan so no opportunity to comment at this point. No documentation available to confirm that the Household Waste Recycling Centre in policy SL02 is compliant with policy FMWN01.

Strategic sites have been clustered in LCC's northwest border. Objection to this strategy s**hows** as only one direction and therefore unsound and unjust. The 702 site has the best of the biodiversity RAG rating.

Policy SL02 does not comply with NPPF para 174a. No measures set in the plan of how the site will 'protect and enhance a valued landscape,' 'a site of biodiversity,' and 'a site of identified quality.' Evidence of valued landscape shown by 542 representations and petition of 2541 objections to Regulation 18 consultation summary (2022). Petition has 3,420 at time of submission.

Official newt surveys show the value of biodiversity on sites, suggestion that new newt surveys are prepared. Report recommendation to reduce surrounding foliage on several ponds to assist newt populations was not carried out. 'Identified quality of site' shown by the very high RAG rating of the site compared to any other listed site.

Policy SL02 does not comply with some of the positive mentions in the Health Impact Assessment (2022). These include: 'Prioritisation of new housing developments built on brownfield sites in turn preserving useable green space,' retention of onsite pond – and associated health benefits of blue space' and 'Planning applications consider some of the wider detriments of health. E.g., trees, air pollution, noise and smell.' Further detail of all of the statements listed in HIA as the basis for the objection are listed Representation 8 of the full representation. process (Document SD/4 Sustainability appraisal of the Reg. 19 Leicester Local Plan (September 2022) and Appendices), as well as a comprehensive site assessment process.

Details of any proposed development on the site will be assessed against Policy DQP04. Landscape Design, and Policy NE02. Biodiversity Gain (SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)) at application stage.

The Council will continue to review the maintenance and management of open and green spaces in line with budget capacities.

The Local Plan policies, particularly the policies in Chapter 6, go as far as possible to mitigate and adapt to climate change, whilst having to take into account whole plan viability.

Details of any proposed development on the site will be assessed against Policy DQP01. Design Principles, Policy DQP04. Landscape Design, and Policy T02. Climate Change and Air Quality at application stage. These policies will help new development address the health and wellbeing issues identified in para. 2.36 of the Local Plan.

To be considered as a modification. Change figure in paragraph 4.25 and add detail of HWRC.

Objects to para 4.8 as this states that the SA has provided a sound evidence base for the Local Plan, however this is cited to be based on unsubstantiated assumptions. Appendix C2 of the SA states that the areas and ward have surplus open space, but it is not shown what data backs this up or how 'surplus' is defined. No other large green spaces identified in the area.		
Unsubstantiated statement that maintenance and management of the site is beyond all budget capacity, as there is no financial information available to confirm this. Council responses to the mowing of the site a few times a year stated that this was to prevent rewilding. No previous comment in Regulation 18 consultation about maintenance and management and not in compliance with council's own maintenance and management page.		
Suitability summary in Strategic site allocations document (2022) states an aim to protect the Local Wildlife Site. However, page 205 of Potential Development sites in the previous Local Plan consultation documents states that at least 80% is a wildlife site.		
No opportunity to further comment on the Local Plan. The Local Plan is for 2020-2036, therefore the 'zero carbon emissions by 2030' target requires actions and policies fit for purpose and stated within the plan.		
Policy SL02 does not comply with para 2.36 as air quality, health and wellbeing will inevitably be adversely affected by the planned development.		
Para 4.25 states 9.74Ha of employment land but policy SL02 states 9.74Ha. This doesn't mention the 1.5Ha for the Household Waste Recycling Centre.		
<ul> <li>Policy SL02 does not comply with NPPF paragraphs 98, 159, 174, and 180.</li> <li>There is no qualitative evidence to support the claim that the benefits of development would outweigh the loss of high scoring green wedge.</li> <li>Planning application number 19990808 refused permission for temporary Gypsy and traveller site in 1999, the concern given over the indiscriminate parking would still be very relevant.</li> <li>Plans for a recycling centre were added after the previous consultation in 2020, therefore there has been no opportunity to comment on its inclusion.</li> </ul>	69 (Local resident)	It is the Council's view that the site allocation is in compliance with national planning policy. The green wedge has been proposed for de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining the land as undeveloped green wedge. Reasons for revising
2020, therefore there has been no opportunity to comment on its inclusion.		green wedge boundaries can be viewed in

Such a centre would likely blight the surrounding areas with flies and foul odours. Local plan para 1.8 states that a separate Leicester Wate and Minerals Local Plan will contain detailed guidance about the allocation of sites for waste disposal. This document isn't available. Policy FMWN01 states that new waste development should be on brownfield land where possible, therefore policy SL02 contradicts it. Policy does not comply with NPPF paragraphs 174a, b, d, e & f, 175, 179a & b, 180a &c, 182, 185a, b & c. Plans for the site will have a significant effect on the habitats site. The negative effects on the green wedge and local wildlife site have been trivialised as if the development proceeds the whole site will be destroyed. The suggestion for achieving biodiversity net gain possibly offsite highlights the difficulties of achieving this onsite. Protection of the ponds and other waterways on site will be very difficult to achieve in my opinion which will put the populations of grey crested newt and other wildlife under extreme threat. The plan with its stated intention to extend biodiversity links into the wider countryside is not possible as the site (including the Blaby side) is surrounded by development.		Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023). The city's need for Gypsy and Traveller pitches was identified in the 2016 GTAA (EB/HO/2). The proposed allocation at the Former Western Park Golf Course is for 7 Permanent Pitches to fulfil that identified need. The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.
Plans for a recycling centre were added after the previous consultation in 2020, therefore there has been no opportunity to comment on its inclusion. Such a centre would likely blight the surrounding areas with flies and foul odours. Local plan para 1.8 states that a separate Leicester Wate and Minerals Local Plan will contain detailed guidance about the allocation of sites for waste disposal. This document isn't available. Policy FMWN01 states that new waste development should be on brownfield land where possible, therefore policy SL02 contradicts it. There is also a waste recycling plant in operation less than a mile away. Introducing more industry and houses to the significant green space is opposing the very thing we need to be increasing. It is outrageous to be chopping down existing mature trees, removing vital patches of green land and introducing more pollution in the form of waste disposal, housing, traffic fumes, etc. It also increases the risk of flooding.	70 (Local resident)	The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations. Details of any proposed HWRC development on the site will be assessed against Policy FMWN01. New Waste and Existing Waste Uses (Document SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)) to ensure that the local area can accommodate the proposed waste use and that any impacts on residential amenity can be adequately mitigated.

		Details of any proposed development on the site will be assessed against Policy DQP06. Landscape Design, NE02. Biodiversity Gain, Policy OSSR03. Open Space in New Development, and Policy T01. Sustainable Transport Network at application stage. A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS).
<ul> <li>Policy does not comply with NPPF paragraphs 174a, b, d, e &amp; f, 175, 179a &amp; b, 180a &amp;c, 182, 185a, b &amp; c. Policy does not comply with NPPF paragraphs 174a, b, d, e &amp; f, 175, 179a &amp; b, 180a &amp;c, 182, 185a, b &amp; c. Plans for the site will have a significant effect on the habitats site. The negative effects on the green wedge and local wildlife site have been trivialised as if the development proceeds the whole site will be destroyed. Green wedges and Local Wildlife Sites are absolutely essential and good for health. The suggestion for achieving biodiversity net gain possibly offsite highlights the difficulties of achieving this onsite. Protection of the ponds and other waterways on site will be very difficult to achieve in my opinion which will put the populations of grey crested newt and other wildlife under extreme threat. The plan with its stated intention to extend biodiversity links into the wider countryside is not possible as the site (including the Blaby side) is surrounded by development. There are many recorded examples on the course of rich biodiversity.</li> <li>The former Western Park Golf Course has the strongest measured biodiversity and passes all four tests of a Green Wedge (as in the Green Wedge Review Addendum Report 2020para 4.38). Proposed development on Green Wedges would have a negative impact on the City's open space network.</li> <li>Policy is in contradiction to Plan paragraphs 2.11, 2.12, 2.22, 2.31, 2.33, 2.36, 3.2, 4.21, 5.22, 4.23, 4.24, 4.25, 4.26.</li> </ul>	72 (Local resident)	It is the Council's view that the site allocation is in compliance with national planning policy. Details of any proposed development on the site will be assessed against Policy DQP06. Landscape Design, NE02. Biodiversity Gain, Policy NE03. Green and Blue Infrastructure, and Policy NE04. Ancient Woodland, Veteran Trees, and Irreplaceable Habitats at application stage. The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).

Adverse effect on carbon reduction & climate change. Detrimental effect on biodiversity, air quality & protecting open spaces.	73 (Local resident)	The site has been proposed for allocation as it is the Council's view that the location is sustainable and the benefits to the city through its allocation outweighs the harm. Details of any proposed development on the site will be assessed against NE02. Biodiversity Gain, Policy DQP06. Landscape Design, Policy OSSR03. Open Space in New Development, and Policy T02. Climate Change and Air Quality at application stage.
Not compliant with National Framework	74, 75, 76, 78, (Local residents)	It is the Council's view that the Plan is in compliance with national planning policy.
The proposed development takes away a valuable area of green wedge, that will have a detrimental effect on the health of residents in Glenfield and Scudamore Road area. It will significantly increase noise and atmospheric pollution and result in increased traffic movements, including large goods carrying vehicles, in a mainly residential area. Furthermore, the totality of proposed developments within the Leicester local plan focus <b>es</b> heavily in the north-west of sector of the city, thus depriving that area of most of the green space currently available. Scudamore Road and the surrounding roads are already heavily used by large commercial vehicles. They are not suited to accommodating additional traffic.	77 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
The inclusion of a waste disposal site is a late and significant addition to initial plans. Locating a waste disposal site close to residential properties will result in a loss of air quality due to smells, fly infestation, noise and heavy traffic as a result of visitors and waste removal, thus creating an unhealthy living environment. Traveller pitches should not be located close to residential or commercial properties. There are already traveller sites in north-west Leicester and Leicestershire, including Enderby, Birstall and Bagworth. There is also a proposal to located traveller sites in nearby Beaumont Park.		Regarding the locations of the strategic sites, there are extremely limited opportunities for the City Council to provide large scale strategic allocations within the city boundaries. All sites have been subject to the Sustainability Appraisal process (Document SD/4 Sustainability appraisal of the Reg. 19 Leicester Local Plan (September 2022) and Appendices), as well as a comprehensive site assessment process.

The site should not be developed since the following provisions of NPPF apply:

- Para 99 (b) this provision is not met within the plan.
- Para 120 (b)
- Para 182

The current site becomes heavily waterlogged during wet weather, ground soakaway is an important issue. Developing the land will create significant drainage challenges that will impact established lower lying properties in Glenfield and towards Rothley Brook. It is not therefore, a suitable site for development.

Policy SL02 has been chosen despite two earlier consultations, one of which excluded residents of the County of Leicestershire. Both of those consultations indicated that the Proposed site for Policy SL02 has by far the greater density and variety of wildlife and flora, and that other sites were preferred for development. The selection process has not therefore been in accordance with NPPF regulations particularly paragraphs 15 and 16(c).

The proposed development does not comply with NPPF paragraphs 179, 180, 102(b), 103, particularly with respect to woodland and veteran trees. The loss of all or a significant number of mature trees will have an adverse impact on air quality and carbon capture. The planting of new trees at another site will not compensate for that for many decades and planning permission should therefore be refused and the site should not be developed.

The policy does not address the consequential impact that the proposed development will have on local services. No assessment of school capacity is included in the policy as set out in NPPF paragraph 95.

Given the proposed development it is likely that additional policies resources will be required as set out in NPPF paragraphs 92. No such provision is included in the proposal.

There is currently insufficient GP service for the catchment area in which policy SL02 lies. No provision is made for additional services to meet increased demand so that the requirements of NPPF para 20 are not met.

The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations. Details of any proposed HWRC development on the site will be assessed against Policy FMWN01. New Waste and Existing Waste Uses to ensure that the local area can accommodate the proposed waste use and that any impacts on residential amenity can be adequately mitigated.

Advice from the Leicestershire Multi Agency Travellers Unit has led the Council to separating allocations for permanent and transit G&T provision. The Former Western Park Golf Couse is allocated the identified need for permanent pitches whereas Beaumont Park is allocated the identified need for transit pitches.

A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).

Consultation leaflets were sent to Leicestershire residents bordering the city.

Details of any proposed development on the site will be assessed against NEO2. Biodiversity

NPPF paras 92(c) and 98 stipulate the need for recreational facilities, the current green wedge (proposed location of the site) provides that required provision and should therefore not be destroyed.		Gain and Policy DQP06. Landscape Design at application stage
The Leicester Local Plan Consultation states that the cost of ongoing maintenance of Policy SL02 site is unaffordable. This argument is not credible, the cost of allowing the site to re-wild will be nil to neglectful. The recent cost of mowing in order to prevent rewilding is more significant.		
Much of the appraisal work took place before the COVID pandemic and before the current financial situation; it should therefore be reviewed in light of current circumstances in which far more brownfield and vacant commercial opportunities exist. Leicester City Council comply with NPPF para 123, and 86(f).		
Policy does not comply with NPPF paragraphs 174a, b, d, e & f, 175, 179a & b, 180a &c, 182, 185a, b & c.	78 (Local resident)	It is the Council's view that the Local Plan complies with national planning policy.
Plans for the site will have a significant effect on the habitats site. The negative effects on the green wedge and local wildlife site have been trivialised as if the development proceeds the whole site will be destroyed. Green wedges and Local Wildlife Sites are absolutely essential and good for health. The suggestion for achieving biodiversity net gain possibly offsite highlights the difficulties of achieving this onsite. Development will basically kill the Great Crested Newt Populations and other wildlife. The sustainability appraisal Appendix D marks the site as RED.		The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge
What will all the new residents do for schooling and healthcare. The two primary schools in Glenfield are oversubscribed and there is no secondary school. Furthermore, out GP surgeries are bursting at the seams. There is no		Topic Paper (2023). The amount of school provision required for
room for 1200+ people. Not to mention policing these areas. Glenfield has minimal policing as it is.		growth under the local plan has been assessed and is set out in Chapter 6 of Document EP/DI/1a Infrastructure Assessment with
Why aren't alternate sites on the other side of the city including the General Hospital brownfield site note being properly investigated.		EB/DI/1a Infrastructure Assessment with Infrastructure Delivery Schedule (2022) and in Document EB/DI/2 Infrastructure Assessment
I believe that this whole process has been made as deliberately confusing as possible.		(Updated) (Excluding Transportation) – Final Draft (January 2023). The schools planned for in

		the local plan will meet current and forecast future need as informed by the evidence.
Surely there are enough brownfield sites around Leicester and Leicestershire to build more homes. Where are the extra doctors surgery, the local GP's are struggling as it is and this area certainly doesn't need more industrial units, and what about the extra traffic that will increase along Scudamore Road it's bad., not to mention the air pollution, the golf course isn't that far from the A46 and M1. This will not improve the health and wellbeing of local residents, the alone the loss of all the wildlife on the golf course.	79 (Local resident)	The Local Plan prioritises new housing development on brownfield sites in the Central Development Area, which is planned to accommodate 6,286 dwellings, i.e., c. 30% of the city's planned housing provision, over the course of the Local Plan period (Table 1, pp.49- 50 of Document SD/2 Leicester Local Plan 2020- 2036 Submission (Regulation 19 publication) Plan (January 2023)).
<ul> <li>The plan has changed significantly from the original one that was consulted on.</li> <li>There was no mention of a Household Waste Recovery Centre. It cannot possibly be legal to add such a major change at this stage.</li> <li>I believe that paragraphs 2.11, 4.7, 4.24, 4.26 and policy SL02 do not comply with NPPF paragraphs 174a, b, d, e, f, 175, 179a, b, 180a, c, 182, 185a, b, c.</li> <li>The plans for Former Western Park Golf Course will clearly have s significant negative effect on the habitat site. The suggestion that there might be a way of achieving BNG offsite clearly illustrates the impossibility of achieving this onsite.</li> <li>The significant amount of new vehicle movements during, and indeed post construction, pose a significant threat to noise and air quality. There is no obvious route to get the traffic that the numbers suggest into the area without significantly disrupting the whole area.</li> </ul>	83 (Local resident)	The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations. It is the Council's view that the Local Plan complies with national planning policy. Details of any proposed development on the site will be assessed against NE02. Biodiversity Gain at application stage.
The site is currently designated as green wedge. The Green Wedge Joint Methodology (2011), Green Wedge Review (2017) and Addendum Report (2020) are highly supportive of the green wedge and therefore do not underpin policies in the plan relating to the deletion of green wedges. The former Western Park Golf Course has the strongest measured biodiversity and passes all four tests of a Green Wedge (as in the Green Wedge Review Addendum Report 2020 para 4.38).		Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments

		will also be expected as part of any planning application for the site. The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
<ul> <li>Policy does not comply with NPPF paragraphs 174a, b, d, e &amp; f, 175, 179a &amp; b, 180a &amp;c, 182, 185a, b &amp; c.</li> <li>The plan is not justified as it does not consider evidence supplied by the sustainability appraisal (Appendix C2, site 702, Appendix D – detailed appraisal of Local Plan Policies) and Green Infrastructure Strategy (2015-2025) Western Park Golf Course page 106. Evidence supplied by these documents does not point toward development of the site. E.g., Appendix D classifies the overall impact: "Sustainability 'red' site 702. Mostly negative impacts, especially for biodiversity and transport, but very positive for housing and jobs." The statement "mostly negative impacts" would suggest that proportionate evidence has not been accounted for correctly in construction of policy SL02.</li> </ul>	84 (Local resident)	It is the Council's view that the Local Plan complies with national planning policy. The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
The site is a designated green wedge area, its proximity to the M1 provides a green lung for the surrounding area, improving area quality and in turn enhancing public health and wellbeing of local residents. Provision of a green lung is vitally important in the area which would otherwise experience high levels of air pollution due to lying adjacent to one of the busiest stretches of M1 motorway. It also provides a barrier to absorb sound and site pollution from the motorway for local residents, thus improving wellbeing.		Details of any proposed development on the site will be assessed against NE02. Biodiversity Gain, Policy DQP06. Landscape Design at application stage.
The area is a LWS with broadleaf woodland, field ponds, veteran trees, mature hedgerows and marsh grassland. Great Crested Newts, bats, badgers etc. Currently the site has many protected species which are protected under		

section 41 of the NERC act and must not be adversely affected by any development. Due to the nature of these species, it would be impossible for them to remain on the site if the proposed development were to take place. The well-established nature of the site which highly developed ecosystems and veteran trees already in place gives it a high biodiversity score and puts policy SLO2 at odds with statements with the NPPF specifically paras 174a, b, d, e.		
The policy does not comply with section 174e of the NPPF and 168. Removal of the former golf course will lead to loss of many trees which will increase carbon dioxide levels, it will lead to emissions from the homes and employment buildings which are proposed and will lead to more vehicles on the surrounding roads which will increase emission further. This will adversely affect the health of the people living in the area due to poor air quality. The lack of open green space is detrimental to human wellbeing. The development does not comply with NPPF section 180a, c, d and 182. The destruction of the former golf course will do all of these things. It is a site for endangered species such as crested newts, badgers and bats and these should be protected. If all the developments go ahead in this local plan here will be virtually no green space left for wildlife or human life. There are large ancient trees on the land which should be protected. Do not destroy this, there is no hope for the survival of this planet if we continue in this way. Do not build on green site, when there is ample brownfield site for this purpose. The benefits of this development do not outweigh the significant environmental detriment that will be caused. The site should be supported for re-wilding, not for development.	86 (Local resident)	It is the Council's view that the Local Plan complies with national planning policy. Details of any proposed development on the site will be assessed against NEO2. Biodiversity Gain, Policy DQP06. Landscape Design, Policy OSSR03. Open Space in New Development, and Policy TO2. Climate Change and Air Quality at application stage.
As defined in paragraph 14.8 "to prevent the merging of settlements" this is exactly what this space is doing at present and removing the green wedge status removed this separation not to mention all of the wildlife.	87, 88, (Local residents)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 –

		Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
Loss of this green wedge to development will remove access to the community to this important part of the green infrastructure, that is still classified as green wedge and is used by much of the local community for recreation, and sports, walking, fitness, mental health and wellbeing. This is also important for flood protection i.e., rain water can soak into the ground instead of being channelled into waterways and has immense benefits on air quality compared to other airs that are closer to busy roads. It also contributes massively to the reduction and absorption of air pollution. The green wedge also has massive wildlife benefits and development of this green wedge will hugely impact on the woodland habitats and biodiversity of the area. The plan mentions a waste recycling facility. Other waste recycling facilities i.e., Biffa at hoods close to Mowmacre hill has caused many issues since first opening and continues to cause poor health, bad smells, despite countless meeting and measures nothing has changed, these should be sited will away from residential areas.	89 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023). A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)). Details of any proposed HWRC development on the site will be assessed against Policy FMWN01. New Waste and Existing Waste Uses to ensure that the local area can accommodate the proposed waste use and that any impacts on residential amenity can be adequately mitigated.
The NPPF para 98 refers to the need for adequate high-quality space for recreation and well-being. The old golf course is central to a large population which is steadily increasing through other developments. If this proposal is allowed to proceed there will be very little facilities which match this criterion. It is currently used by locals, and has somewhat reverted to its natural state, increasing the valuable biodiversity in the area.	90 (Local resident)	It is the Council's view that the Local Plan complies with national planning policy. Details of any proposed development on the site will be assessed against NE02. Biodiversity Gain at application stage

Para 174-182 of the same policy would also be contravened by this proposal for similar reasons. Over the years the land has been idle many types of wildlife have established themselves here and whilst they may not individually be of any specific scientific rarity, they cumulatively add great value to the local environment, and would have nowhere else to go locally, leading to a sterile area.		A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023).
Para 185 of the same policy is conflicted I believe. The golf course site is uphill from an area which frequently floods. The site itself must absorb substantial amounts of rainwater from the industrial estate above it, so further development of this site would inevitably inflame a serious current problem. Lastly there is already too much traffic in the area. At peak times traffic attempting to leave the M1 at J21 South backs up beyond J21a, which also causes delays to A46 South traffic. The whole area is well known for delays frequently encountered on trunk and surrounding roads and this proposal will aggravate the situation further.		Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.
The planned new access road off Ratby roundabout will cause major issues. There are already long queues. Air quality and general pollution will be even poorer than it is already.	91 (Local resident)	Details of any proposed development on the site will be assessed against NE02. Biodiversity Gain at application stage.
In NPPF para 180a and c the former Western Park Golf Course is officially listed as an area of high biodiversity. Any development will cause huge amount of damage to this wildlife site.		The Council have assessed the archaeological constraints on the sites. Any development coming forward would be expected to consider
There is evidence a roman road crosses the course and pottery sheds have been found. The roman road is shown on the local plan map page 150. The golf course absorbs huge amounts of rainfall.		these constraints in the development design and layout. Archaeological assessments and Heritage Impact Assessments will be required as
In the latest plan a household recycling centre has been added. This was not listed on the previous Regulation 18 public consultation and therefore no objections were possible on the previous consultation. This would bring even more vehicles into the area, adding further to congestion, air pollution, flies and odours.		part of the planning application process in accordance with policies HE01 and HE02. The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site

<ul> <li>In the LCC Local Plan, Site Allocations, Site Assessments it states "LCC owned site. Green Wedge archaeology, contamination, junction improvements, site drainage and high biodiversity constraints to be addressed." None of this is addressed in the plan.</li> <li>Access to the site is very limited. The main access is through a very busy road on an industrial estate with a lot of HGV movements.</li> <li>How can the council build on the only green space in this area.</li> </ul>		<ul> <li>was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.</li> <li>Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.</li> </ul>
The Policy is inconsistent with plan paragraphs 14.3, 14.4, 14.8 and 14.12. Western Park Golf Course is part of a green wedge and should be preserved as such. Paragraph 14.10 claims that Western Park Golf Course is no longer green wedge but diagram 17 (p 207) contradicts this. The golf course opens pace is an invaluable, easily accessible leisure resource for local people. We have no similar "wild space" within walking distance so development should not be permitted. It is certainly not "surplus to requirements" (OSSR02 a). The SL02 development plan does not meet the criteria of polices OSSR01 (a-g) and OSSR02 (a-f).	92 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
The kirby Green Wedge is a crucial asset for our environment and fulfils all four vital functions of a green wedge. Additionally, this green space serves as a breathing space for the urban area. The green wedge is a valuable recreational resource that promotes a healthy lifestyle and supports the physical and mental wellbeing of the population. It is essential to preserve this green space, by implementing policies and regulations that promote its conservation and protection. The site faces as significant issue with regards to is access via highways, as it is currently very poorly connected. Its sole access point feeds onto an already heavily congested Scudamore Road, which serves both an industrial estate and	93 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).

residential area. This fact is supported by Department for Transport traffic data. While a new access road is preferred, it poses numerous issues, as it would have to be located off Ratby roundabout, which is outside of the city boundary in Blaby. The construction of any new roads would further result in destruction of green space, and the increased vehicle movements would damage air quality, posing a threat to health and wellbeing of the local population.

Western Park Golf Course is officially recognised as an area of high biodiversity, as stipulated in the NPPF para 180a and c. Any development of the site would inevitably cause significant damage to the existing wildlife habitat. Construction activities would pose a significant risk of pond contamination, leading to the potential loss of species and other critical wildlife. The site also contains ancient woodlands and trees, adding to its ecological value and the importance of its protection.

It has come to light that a recycling plant has been proposed for the area, with plans to establish it after the first Regulation 18 consultation. However, this proposal was not disclosed at the previous consultation, which meant that there was no opportunity for objections to be raised against it. The proposed recycling plant would result in an increase in vehicular traffic in the area, adding to the existing congestion issue sand worsening air quality. The plan could also potentially contribute an increase in flies and odours, causing further problems for the local community.

The golf course serves a critical role in the local ecosystem, with its vast expanse of greenery helping to absorb significant amounts of rainfall. The course's ability to soak up water is essential in minimising the risk of flooding, as it helps to prevent water for accumulating in other areas. The proposed development plans could threaten this vital function.

Furthermore, the site has a rich cultural and historical heritage, as evidenced by the discovery of Roman pottery sheds. The existence of a roman road that crosses the course adds to this historical value. The Local Plan map on page 150 depicts this Roman Road. Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.

Details of any proposed development on the site will be assessed against NEO2. Biodiversity Gain at application stage.

The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.

A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS).

The Council have assessed the archaeological constraints on the sites. Any development coming forward would be expected to consider these constraints in the development design and layout. Archaeological assessments and Heritage Impact Assessments will be required as

If development takes place, it will merge the Kirby Frith development and will mean the merging of settlements. The Western Park Golf Course provides a green lung into the urban area and acts as a recreational resource. Together with site 525 congestion will increase on Scudamore Road. The Western Park Golf Course development will damage wildlife and ancient woodlands that the Golf Course contains.	94 (Local resident)	<ul> <li>part of the planning application process in accordance with policies HE01 and HE02.</li> <li>The site has been proposed for green wedge dedesignation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).</li> <li>Details of any proposed development on the site will be assessed against NE02. Biodiversity Gain at application stage.</li> </ul>
The proposed development will have a detrimental effect on air quality and a huge reduction in open space. Such development isn't compatible with paragraph 2.36 of the Local Plan. Para 182 of the NPPF states that presumption in favour of sustainable development doesn't apply where plans have significant effect in habitat. There is no evidence of an appropriate assessment indicating that the habitat will not be adversely affected. On the contrary, the supporting documents show that all aspects of the habitat will be adversely affected. Referring to NPPF paragraph 180a and c. The former western park golf course is a largely biodiverse site of 52ha, but the proposed development is of such magnitude that it is highly unlikely that significant harm would not be the result. The site does contain ancient woodlands and trees. Accordingly, permission for this site for development should be refused and removed from the local Plan. Any incursion into this last remaining section of green wedge will be devastating for the local communities. The negative impact will have far reaching consequences for Leicester. Vehicle movements will be much higher.	95 (Local resident)	Details of any proposed development on the site will be assessed against Policy T02. Climate Change and Air Quality, Policy OSSR03. Open Space in New Development, Policy DQP06. Landscape Design and Policy NE02. Biodiversity Gain at application stage. Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.

This will lead to poor air quality. Loss of woodland and mature trees will reduce carbon capture. There is an opportunity to improve the latter with a programme of tree planning which will assist Leicester City's Climate Emergency Declaration. The Former Western Park Golf Course is an official Local Wildlife Site and the loss of natural habitat which is currently thriving on the former golf course will greatly impact its recorded "high biodiversity" status.		The Council have assessed the archaeological constraints on the sites. Any development coming forward would be expected to consider these constraints in the development design and layout. Archaeological assessments and Heritage Impact Assessments will be required as part of the planning application process in
There are considerable site highway access issues with the site. There is currently one access road onto the site from Scudamore Road. This is a very busy industrial park and residential feeder road. Traffic levels on Scudamore Road were recorded by the Department for Transportation on 6 <sup>th</sup> September 2019. A total of 4,034 vehicle movements were recorded between 7am and 7pm. The Local Plan supporting documents define potential highways access to the site, namely by developing Ratby roundabout. However, Ratby roundabout is not within the city boundary and therefore any such plans rely on cross border cooperation with Blaby and no such actual agreement on this point is cited in the Local Plan. The roads currently feeding onto Ratby roundabout have high traffic volumes, therefore further congestion and associated air pollution would be inevitable. Any other potential highways access from Glenfield residential border would also be problematic, requiring destruction of additional Blaby green spaces or demolition of properties to achieve access.		accordance with policies HE01 and HE02.
Referring to diagram 10 page 150. There is evidence that a Roman Road to Manchester crosses the site. The track of a historic road and three locations of archaeology interest are shown in diagram 10. There is considerable evidence that site 702 is rich in archaeological material.		
<ul> <li>The household waste recycling centre was not listed on the previous</li> <li>Regulation 18 consultation and therefore no objections were possible, this</li> <li>raises the question of legality in the actions of the council vis a vis procedure.</li> <li>This would bring even more vehicles into the area, adding further to</li> <li>congestion, air pollution, flies and odours.</li> <li>The former Western Park Golf Course is stated in the documents as "high</li> <li>scoring green wedge" (Green wedge Addendum Report 2020).</li> </ul>	96 (Local resident)	The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.

Post pandemic news analysis has highlighted the importance of access to leisure areas and its reduction of the impact on local health services. Destruction of facilities in walking distance of IMD areas of deprivation (New Parks) will negatively impact crime, health, and wellbeing indicators.		Details of any proposed development on the site will be assessed against Policy OSSR03. Open Space in New Development at application stage.
The golf course absorbs huge amounts of rainfall. It was sometimes closed for golf due to being waterlogged. Kirby Road has been closed due to flooding already I the past 2 years. Question of negligence liability upon council when there is an increase of incidents.		A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2
Highways access to the site is very poor. It feeds on to an already very busy Scudamore Road which serves an industrial estate and a residential area. Any planned new access roads will have many issues. The main preferred new access road is off Ratby roundabout, but this is outside the city boundary in Blaby. Any new access road will cause further destruction. Much higher vehicle movements will further damage air quality.		<ul> <li>Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).</li> <li>Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The</li> </ul>
Referring to NPPF paragraph 180a and c. The former Western Park Golf Course is officially listed as an area of high biodiversity. Development will cause enormous damage to this wildlife site.		masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06 Highways Infrastructure, Policy T01 Sustainable Transport
There is evidence of a Roman road that crosses the course and pottery sheds.		Network, and Policy T03 Accessibility and
Endless expansion of urban sprawl acknowledges the importance of local and central government to legislate or act against negligent sale of social housing stock; brownfield intransigence; failure to deal with increases of empty second homes; and private landlord profiteering. Endless development is not sustainable in a country already as densely populated as the United Kingdom.		Development. Transport Impact Assessments will also be expected as part of any planning application for the site.
That Plan states that due regard will need to be given to the surrounding green wedge and will need to be in compliance with the rest of the policies in this plan; green wedges are clearly a priority to the plan so why destroy a readymade mature green space. Leicester is one of Britain's more social deprived cities it should be the Council's priority to provide green spaces to enable people to undertake physical activity and enjoy green spaces to reduce stress and anxiety. The impact of green space or "green lung" between the city	100 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 –
centre and the M1 and A46 probably cannot be measure in terms of mental wellbeing but I'm sure the pollution that is omitted from these major traffic		Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).

arteries can. The value of biodiversity of the old golf course needs to be adequately reviewed before it is destroyed; the area is a huge asset to the local community and is considered as valuable place as Bradgate Park is to the		The household waste recycling centre was added to the site allocation between the
people who live in Charnwood. Placing a Household Recycling Centre in the middle of this "green wedge" is not required, there are many waste land areas around the city that could accommodate this. Subjecting the local population to the noise and smell that will be omitted is totally unreasonable in a residential area.		regulation 18 and regulation 19 stages of Local Plan preparation.
According to NPPF para 180a and c the former western park golf course is officially listed as an area of high biodiversity. Any development will cause huge damage to this Wildlife Site. The council have been mowing the area stating there is a need for the golf course to be maintained but in fact this has been done so that rewilding is hampered.	101 (Local resident)	Details of any proposed development on the site will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design and Policy NE02 Biodiversity
Access to the site is limited. Main access is via a busy road on am industrial estate with a lot of HGV movement. The planned access from Ratby roundabout will cause major issues. This is already a congested area during rush hour. Air quality and general pollution will be even poorer.		Gain, at application stage. The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the
Additional houses and industry will increase the excessive vehicles travelling through Glenfield village which is a conservation area.		city through allocation of the land outweighs the benefits of retaining it as undeveloped
The old Western Park Golf Course is stated in the proposals as "high scoring green wedge." This green space has always been a recreational area and there has always been need for it. This is a well-used recreational green space that is needed for the wellbeing and mental health of residents. Building on this green		green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
space will mean that the local residents will have no option but to use their vehicles to drive to other recreational spaces increasing the amount of traffic and pollution in the area.		A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk
Building on the golf course will cause further flooding problems in the area as the golf course absorbs an enormous amount of rainfall. With our changing climate the council should be protecting areas like the golf course to absorb rainfall.		and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).

<ul> <li>There is evidence a Roman Road crosses the course and pottery sheds have been found. The roman road is shown on Local plan map page 150. This should be taken into account and protection required.</li> <li>A household recycling centre has been added to the plan and this was not listed on the previous regulation 18 public consultation and therefore no objections were possible on the previous consultation. This recycling centre would bring even more vehicles into the area, adding further to congestion. Causing sir pollution, flies, odours and noise.</li> </ul>		The Council have assessed the archaeological constraints on the sites. Any development coming forward would be expected to consider these constraints in the development design and layout. Archaeological assessments and Heritage Impact Assessments will be required as part of the planning application process in accordance with policies HE01 and HE02. The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit
<ul> <li>Policy SL02 is unsound as it does not enable delivery of a sustainable development in accordance with NPPF policies. It fails to identify how the NPPF's requirement in paragraph 174a to protect and enhance sites of biodiversity can be achieved on site 702, which contains a Local Wildlife Site, broadleaf woodland, veteran trees, hedgerows, marsh grassland and protective species. Modification is needed to set out in a masterplan how biodiversity assets on site are to be protected, and biodiversity net gain achieved.</li> <li>Policy SL02 does not comply with the requirements of NPPF paragraph 110b. There is no clear provision in the policy ensuring that "safe and suitable access to the site can be achieved for all users."</li> </ul>	102 (Local resident)	representations. Details of any proposed development on the site will be assessed against Policy TO2. Climate Change and Air Quality, Policy OSSR03. Open Space in New Development, Policy DQP06. Landscape Design and Policy NE02. Biodiversity Gain at application stage. Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.

<ul> <li>The Western Park Golf Course is Green Wedge. In an area surrounded by the M1, A46, A50 and the city on the other side. This green area is critical. It is the only lung to reduce CO2 in this area. It also helps prevent the city expanding into Leicestershire. Society as a whole is calling for saving the environment and reducing CO2.</li> <li>In terms of traffic and roads already in the area, since the A46 has been in place and also the new industrial development at Optimus Point, it has shown the roads cannot cope with current traffic volumes. The air quality will plummet if a new development is introduced/The waste recycling was not</li> </ul>	103 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
previously listed and we were never given the opportunity to object to this. This will be added to with pollution, flies and odours from the waste recycling and also increased traffic.		Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways
If the site is developed the risk of flooding in the area will massively increase.		access for the site, and this will be assessed
According to NPPF para 180a and c the former western park golf course is officially listed as an area of high biodiversity. If development goes ahead, it will damage this beyond repair forever. The site also includes ancient woodlands and trees.		against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning
There is also evidence a Roman Road crosses the course and pottery sheds have been found.		application for the site.
According to the Health Impact Assessment (2022) this development would clearly have a negative impact on all the local resident's health hand mental health and wellbeing.		The Council have assessed the archaeological constraints on the sites. Any development coming forward would be expected to consider these constraints in the development design and layout. Archaeological assessments and Heritage Impact Assessments will be required as part of the planning application process in accordance with policies HE01 and HE02.
		Details of any proposed development on the site will be assessed against Policy TO2. Climate Change and Air Quality, Policy OSSR03. Open Space in New Development, Policy DQP06.

The golf course and its associated trees are an important flood defence mechanism. Development of the site will reduce the available green space for local residents to use for recreational purposes. There is a shortage of infrastructure in the area including a lack of primary and secondary school spaces, as well as capacity at medical centres. Development on this site will lead to a loss of a high scoring green wedge. The household waste recycling centre was not included at regulation 18 which meant that residents could not object to it at that stage. It is likely to cause pollution including impacts linked to noise and traffic.	104 (Local Resident)	Landscape Design and Policy NE02. Biodiversity Gain at application stage. Details of any proposed development on the site will be assessed against Policy T02. Climate Change and Air Quality, Policy OSSR03. Open Space in New Development, Policy DQP06. Landscape Design and Policy NE02. Biodiversity Gain at application stage. The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.
<ul> <li>Western Park Golf Course is an important green wedge acting as a green lung for the city in reducing CO2. It is an important resource for physical and mental health.</li> <li>The site is an area of high biodiversity including populations of Great Crested Newts. The site includes ancient woodlands and trees.</li> <li>The household waste recycling centre was only introduced to the plan at reg 19. Residents were not given an opportunity to object. The proposal will increase congestion on inadequate roads. The proposal will increase pollution as well as pests and smells.</li> <li>Recent developments within the area have increased traffic this will make this matter worse which will in turn make the air quality worse.</li> <li>The green wedge currently prevents flooding which could put the neighbouring areas at risk if the site is built on.</li> <li>Priority should be made to development on brownfield sites over greenfield sites such as this.</li> </ul>	105 (Local Resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023). The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.

There is no mitigation proposed with the plan to mitigate against the impacts on local residents physical and mental health and well-being.		Details of any proposed development on the site will be assessed against Policy T02. Climate Change and Air Quality, Policy OSSR03. Open Space in New Development, Policy DQP06. Landscape Design and Policy NE02. Biodiversity Gain at application stage. A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
<ul> <li>Whilst the plan mentions landscape, natural environment and increasing trees and wildlife the proposals don't consider this sufficiently.</li> <li>The associated local plan health impact assessment states a priority for brownfield before greenfield development as well as protecting usable green space.</li> <li>Any new development will increase traffic and cause congestion.</li> <li>Increasing the population in an area will increase demand for green space.</li> <li>Development will increase flood risk.</li> <li>Lack of infrastructure in the area will need GPs, community nursing and schools.</li> </ul>	106 (Local Resident)	Details of any proposed development on the site will be assessed against Policy T02. Climate Change and Air Quality, Policy OSSR03. Open Space in New Development, Policy DQP06. Landscape Design and Policy NE02. Biodiversity Gain at application stage. A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)). Per para. 4.26 of the Local Plan, a masterplan
		will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways

		Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.
<ul> <li>Household waste recovery centre was not included in reg 18 consultation.</li> <li>Proposal will bring increased traffic, pollution, noise, flies and odours.</li> <li>The council has not made available the Leicester Waste and Minerals Local</li> <li>Plan, this proposal should be included within this document instead.</li> <li>The Waste Needs Assessment states that there is enough waste capacity, so this facility isn't needed.</li> <li>The Kirby green wedge meets all four purposes of a green wedge and if it is built up will lead to a reduction in the number and area of green wedges.</li> <li>The proposal will conflict with numerous paragraphs in the NPPF due to impacts to biodiversity and designated habitat sites.</li> <li>The site appraisal contained within appendix D highlights significant issues with the allocation of this site.</li> <li>Biodiversity net gain will be difficult to achieve on this site due to the high ecological value of a site.</li> <li>Gypsy and Traveller pitches have been refused previously at this site.</li> <li>Potential for cumulative impact with nearby site 525 (Fulford Road)</li> </ul>	108 (Local Resident)	The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations. Details of any proposed development on the site will be assessed against Policy T02. Climate Change and Air Quality, Policy OSSR03. Open Space in New Development, Policy DQP06. Landscape Design and Policy NE02. Biodiversity Gain at application stage. Planning application refused in 1999 for Gypsy & Traveller pitches.
<ul> <li>Evidence supporting the local plan is highly supportive of the green wedge.</li> <li>Western Park Golf course has the strongest measured biodiversity and also passes all four tests of a Green Wedge so should be retained as such.</li> <li>Proposed development on green wedges will seriously impact the City's open space network.</li> <li>If development is approved on both this site and the neighbouring site in Blaby district will mean the whole green wedge is lost.</li> </ul>	112 (Cllr Nick Chapman – Glenfield)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).

The recovery/recycling centre was not listed in the reg 19 plan and there was no opportunity to comment on the proposal at that stage.

The waste needs assessment states that Leicester has more than sufficient capacity for recycling and reuse no other documents confirm the proposal is compliant with FMWN01.

The Council has refused permission previously for gypsy and traveller sites in 1999.

Flooding will be an issue without major flood mitigation measures.

Site access is via Scudamore Road, which is narrow, the other is via Ratby roundabout which is outside of the city will no agreement in place with Blaby District Council for it to be used as highways access.

Site 525 Fulford Road will feed on to Scudamore Road.

There are three heritage asset and historic road crossing the site. There is also evidence of a Roman Road.

There will be a cluster of sites on Leicester City's north west border, the planned expansion in only one direction is unsound and unjust.

The planned deletion of so many green wedge areas is not acceptable.

Details of any proposed development on the site will be assessed against Policy T02. Climate Change and Air Quality, Policy OSSR03. Open Space in New Development, Policy DQP06. Landscape Design and Policy NE02. Biodiversity Gain at application stage.

The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.

An application for change of use to temporary stopping place (2 pitches) for gypsies & Travellers was refused in 1999 (19990808).

A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).

The Council have assessed the archaeological constraints on the sites. Any development coming forward would be expected to consider these constraints in the development design and layout. Archaeological assessments and Heritage Impact Assessments will be required as

		part of the planning application process in accordance with policies HE01 and HE02.
The proposal does not comply with the NPPF.	115 (Local resident)	The site has been proposed for green wedge de-
The site is a green wedge and a local wildlife site.		designation as it is the Council's view that the location is sustainable and the benefits to the
Development on the green wedge will adversely impact the predominantly open and undeveloped character.		city through allocation of the land outweighs the benefits of retaining it as undeveloped
This green wedge passes all 4 tests for a green wedge and has the strongest measured diversity rating.		green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge
Paragraph 14.10 states that the site no longer has green wedge status however this is incorrect as the plan isn't adopted.		Topic Paper (2023).
The Strategic site proposed for allocation (2022) states that the strategic opportunity of the site, as a natural extension of the existing residential estate outweighs the loss of the green wedge.		Details of any proposed development on the site will be assessed against Policy T02. Climate Change and Air Quality, Policy OSSR03. Open Space in New Development, Policy DQP06.
Proposal will impact an area of high biodiversity.		Landscape Design and Policy NE02. Biodiversity
Providing on site biodiversity net gain will be difficult to provide if it is required to provided offsite.		Gain at application stage.
A future minerals and waste plan will set out waste policies for Leicester so why have the council included a waste site at the site pre this plan.		The Council have assessed the archaeological constraints on the sites. Any development coming forward would be expected to consider
Any waste site should be located on brownfield sites rather than green wedges.		these constraints in the development design and layout. Archaeological assessments and Heritage Impact Assessments will be required as
Para 1.4 states that the community has signed up to the plan, which is not true.		part of the planning application process in accordance with policies HE01 and HE02.
There are heritage assets on the site including a potential roman road.		An application for change of use to temporary
Why is the site now suitable for gypsy traveller pitches when it wasn't in the past.		stopping place (2 pitches) for gypsies & Travellers was refused in 1999 (19990808)
The community have not signed up to the local plan.	116 (Local resident)	Details of any proposed development on the site will be assessed against Policy T02. Climate Change and Air Quality, Policy OSSR03. Open

The proposal is contrary to the councils aims regarding climate change actions and carbon reduction.		Space in New Development, Policy DQP06. Landscape Design and Policy NE02. Biodiversity
Will lead to the destruction of biodiversity rather than protecting and enhancing it.		Gain at application stage. A flood risk assessment will be undertaken on
The proposed 'open space' won't mitigate the loss of across the rest of the site.		the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk
The loss of trees will release carbon stored with them.		and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission
The development of the site will increase pollution including air pollution in the area.		(Regulation 19 publication) Plan (January 2023)).
The council should be increasing the amount of housing units in the city centre by using the vacant office and retail units rather than building on greenfield/green wedge sites.		
Development on the site will increase flooding in the area.		
Will lead to the significant loss of biodiversity in the area.		
The development of the site will have impacts on mental health.		
The plan to create a household waste recovery centre/recycling centre is abhorrent due to ongoing smells and plagues of flies.		
Community will be prevented from having easy access to this existing green space.		
Development of the site would destroy the open space which is an important part of the landscape setting.	118 (Local resident)	Details of any proposed development on the site will be assessed against Policy T02. Climate
The Green Wedge designation remains in place until the plan has been formerly adopted and not to be developed before. This satisfies all four functions of the green wedge, the most important of which being in the green lung reduces carbon and pollution.		Change and Air Quality, Policy OSSR03. Open Space in New Development, Policy DQP06. Landscape Design and Policy NE02. Biodiversity Gain at application stage.
Suggestion that Greens wedge designation has been removed in para 14.10 which is misleading.		The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the

Former Western Park Golf Course has been used recreationally for over 20 years, including local residents immersing themselves in nature and the positive impacts on mental health and wellbeing. Site has an abundance of flora and fauna, including Great Crested Newts, badgers and other species. The current green wedge status protects the		city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge
wildlife corridor for many of these species. The site has an abundance of trees.		Topic Paper (2023).
Retention of 6.7& of the site for 'open space' will not be sufficient to satisfy the criteria for green wedge development. Sit has trees in abundance which store carbon. New trees will not retain the same amount of pollution as mature trees.		
Trees and grassland are essential for water retention, preventing run off to surrounding areas. Site absorbs a huge amount of rainwater which would not flow into Glenfield, Rothley Brook and surrounding Scudamore Industrial Estates. Drainage infrastructure and Rothley Brook cannot cope with the volume of run off.		
Site is bordered by industrial units on Scudamore Road and Optimus Point, as well as close to the M1 and A46. Development of the site would reduce the ability to reduce pollution. Development is contrary to carbon reduction and climate change actions the council is taking.		
The 6.7% provision of open space does not in any way maintain and enhance the quality of the open space network.		
Accessibility could be improved to the site to make this an ever-great asset to Leicester as a green wedge.		
Development will not support the enhancement and maintenance of biodiversity. Biodiversity Net Gain cannot be achieved by building on this site.		
Main access via Scudamore Road as stated in the policy SL02. Access needs to accommodate a large influx in HGV's and cars using the recycling centre as well as local resident cars and caravans.	121 (Local resident)	Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways
Development is completely against the environment protection act.		access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport

Building on green wedges is not permitted and this site is legally designated as green wedge.Policy SL02 does not take into account the flooding risks of the sites.		Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.
Does not take into account the economic impact on the neighbourhood properties values. Neighbourhood administratively under the Blaby district Council and it is unclear from the proposals with regards using access to site has been agreed. The site was deemed unsuitable for gypsy and travellers in a planning application in 1999. Questions why this is suitable now. Consultation has not been carried out properly as no emails received or letters with the consultation. Suggestion that the council could consider the site for other uses i.e., a renewable power source site.		<ul> <li>The site has been proposed for green wedge dedesignation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).</li> <li>A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).</li> <li>An application for change of use to temporary stopping place (2 pitches) for gypsies &amp; Travellers was refused in 1999 (19990808).</li> <li>Consultation has been carried out in line with the Councils adopted Statement of Community Involvement and Temporary Addendum.</li> </ul>
Reference made to NPPF paras 98, 174, 179, 180c. Disgraced that Council would sell amazing piece of land for development including traveller sites and a recycling plant. Taking away the only space	126 (Local resident)	The site has been proposed for allocation as it is the Council's view that the location is sustainable and the benefits to the city through its allocation outweighs the harm. Planning

Glenfield, Braunstone Frith and Kirby Frith have as a tranquil escape from concrete. Amazing wildlife in bats, newts and birds of prey.		applications would be expected to consider impacts to open space and wildlife.
Site meets all four functions of the Green Wedge mentioned in para 4.38 of Green Wedge Addendum (2020). It is a key area of green belt land and of outstanding beauty which acts as a natural barrier between both old and recent industrial developments.	124 (Local resident) & 127 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs
Access and egress to the current Scudamore Road Industrial Estate is already terribly busy and feeds on to either residential areas or a narrow country road prior to reaching any major A road or Motorway. (Refer to Department of Transport traffic data) Site 525 will also use the same road networks which will result to more land loss, higher vehicular movements, and further damage air quality.		the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
FWPGC listed as an area of high biodiversity and a place of natural beauty as per NPPF paras 180a & c. Development would damage wildlife (Great Crested Newts), ponds (increased pond contamination), ancient woodlands and trees.		Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed
Household Waste Recycling Centre not listed previously during Regulation 18 consultation and will add higher levels of vehicles on the road, congestion, air pollution, ground contamination, flies and unpleasant smells.		against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.
		Details of any proposed development on the site will be assessed against Policy TO2. Climate Change and Air Quality, Policy OSSR03. Open Space in New Development, Policy DQP06. Landscape Design and Policy NE02. Biodiversity Gain at application stage.
		The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site

		was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.
Green Wedge Addendum (2020) states that Kirby Frith Green Wedge meets every one of the four purposes of the Green Wedge. This proposal fails in its duty to be a sustainable development as it does not support ecosystems, will cause damage to the underdeveloped character of the Green Wedge and increase motorised traffic. Little consideration given to ancient hedgerows and existing trees,	129 (Local resident) & 130 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge
Consideration has not been given to retaining some of the existing open space in Glenfield. This will change the status of Glenfield as an ancient village.		boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
Highways access to the site is poor, feeding onto extremely busy Scudamore Road. Site 525 proposed will feed into the road. Main new access road through Blaby which will cause further destruction, higher vehicle movements and impacts to air quality.		Details of any proposed development on the site will be assessed against Policy T02. Climate Change and Air Quality, Policy OSSR03. Open Space in New Development, Policy DQP06.
Does not meet NPPF paras 180 a & c as of high biodiversity. Enormous damage to wildlife site by development including to ponds (with Great Crested Newts), ancient woodlands and trees.		Landscape Design and Policy NE02. Biodiversity Gain at application stage.
Still need to address all of the constraints listed in the strategic site allocations document.		Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways
Household Waste Recycling Centre not listed previously during Regulation 18 consultation and will add further congestion, air pollution, vermin, flies and odours.		access for the site, and this will be assessed against Local Plan Policy TO6. Highways Infrastructure, Policy TO1. Sustainable Transport
Site development will provide some flooding and drainage issues.		Network, and Policy T03. Accessibility and Development. Transport Impact Assessments
Roman Road with Roman pottery shards found and included on local plan map page 150.		will also be expected as part of any planning application for the site.
No consideration has been given to existing brownfield site availability, which should be preferential to meet government requirements.		The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local

		<ul> <li>Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.</li> <li>A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).</li> <li>The Council have assessed the archaeological constraints on the sites. Any development coming forward would be expected to consider these constraints in the development design and layout. Archaeological assessments and Heritage Impact Assessments will be required as part of the planning application process in accordance with policies HE01 and HE02.</li> </ul>
Does not comply with NPPF paras 98, 174, 179, 180a, 182 & 185	131 (Local resident)	The Council believes that the Policy complies with the NPPF.
Para 14.10 is unjustified as it does not account for reasonable alternatives. Unacceptable that there is no specified designation of open space.	132 (Local resident)	Details of any proposed development on the site will be assessed against Policy T02 Climate
Sustainability of the development is red and the vast array of wildlife, ponds, trees – including ancient trees. Which have not been represented or evidenced in the proposals.		Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design, and Policy NE02 Biodiversity Gain, at application stage.
Proposals and policies should safeguard for the benefit of community wellbeing, including protection of wildlife and the environment.		, ,,

<ul> <li>Already high amounts of traffic with main routes such as M1, A46 and A50, to add more traffic to this area while reducing the amount of green space contradicts the programme or action to reduce greenhouse gases.</li> <li>Not enough local schools in the area and no schools included in the plan.</li> <li>Limited amount of open space in Glenfield that is of sufficient size and accessible for residents.</li> <li>Site is obviously soaking up a large amount of water and removal will put further pressure on Rothley Brook. New Glenfield Park development has already made flooding on Kirby Road.</li> <li>Site is used frequently for walking and children playing, physical and mental health important.</li> </ul>	134 (Local resident)	Details of any proposed development on the site will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design, and Policy NE02 Biodiversity Gain, at application stage. A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
<ul> <li>Site sustainability appraisal for strategic sites is all red or amber.</li> <li>The Council is adamant that houses have to be built on greenfield sites, which are all located in North-west Leicester.</li> <li>Reoccurring factor of strategic sites being remote in terms of transport and existing green wedge designation.</li> <li>Negative impacts of development on the health services, education and employment.</li> <li>Loss of green space will have an adverse impact on mental health and wellbeing of residents.</li> </ul>	135 (Local resident)	Masterplans will be required to develop strategic sites. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site. Details of any proposed development on strategic sites will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design, and Policy NE02 Biodiversity Gain, at application stage.
Access to the site via Scudamore Road is very limited. Development of site 525 will also feed in on this road. Congestion and air pollution will be very high.	137 (Local resident)	Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed

<ul> <li>Additional access points will be required and one option is through Blaby District Council.</li> <li>Many other sites available that will not destroy green space. Questions why all in the west of the city and brownfield site consideration are first.</li> <li>Objection to allocation for a Household Waste Recycling Centre which was not part of the original consultation. Existing waste site on Sunningdale Road and concerns over pollution, flies and odours in the area.</li> <li>No sites within a 15-minute walk suitable as accessible green space</li> <li>Council have chosen to ignore a petition of over 3000 signatures on this site.</li> </ul>		against Local Plan Policy T06 Highways Infrastructure, Policy T01 Sustainable Transport Network, and Policy T03 Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site. The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.
<ul> <li>Policy SL02 does not comply with the NPPF.</li> <li>This site is an essential green space that supports biodiversity (badgers, great crested newts, veteran trees), flood alleviation, recreation and leisure opportunities which are vital for health and wellbeing and ameliorating climate change.</li> <li>Impact of loss of green wedge mentioned in para 14.8 far reaching, loss of village identities and creation of urban sprawl.</li> <li>NPPF para 180a and c apply as the area is listed as high biodiversity.</li> <li>Sustainability Appraisal appendix C2 702. The gold course should be rewilded, other councils have had the foresight to see the benefits of this and annual cost should not be prohibitive.</li> <li>Household Waste Recycling Centre mentioned in para 4.26 was not listed on the Regulation 18 local plan and FMWN01 states that new waste developments should be on brownfield sites where possible.</li> <li>Highways access is a big issue and compounded by proposed development on site 525.</li> </ul>	138 (Local resident)	The Council believes that the Policy does comply with the NPPF. Details of any proposed development on strategic sites will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design, and Policy NE02 Biodiversity Gain, at application stage. The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).

		The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations. Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.
<ul> <li>The FWPGC meets all 4 purposes of the Green Wedge as per the Green Wedge addendum (2020). It prevents the merging of settlements which causes them to lose their identity. For those without access to a car it provides a beautiful walk necessary to mental health.</li> <li>NPPF paras 180a &amp; c list the area as having high biodiversity, building will have irreparable damage to the wildlife, ancient woodland and ponds with great crested newts.</li> <li>Waste recycling centre was not disclosed at Reg 18 and there have already been problems with the recycling centre on Scudamore Road, with more odours, flies, air pollution and traffic.</li> <li>Area should be left to rewild instead.</li> </ul>	144 (Local resident)	Details of any proposed development on strategic sites will be assessed against Policy TO2 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design and Policy NE02 Biodiversity Gain, at application stage. The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).

		The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.
If the area is destroyed, no longer have a high scoring proportion of green wedge in the area, reason for living in the area to have to green spaces to enjoy. Former Western Park Golf Course is listed for high biodiversity. Development will cause enormous damage to this wildlife site. Huge risk of pond contamination during construction likely to impact the Great Crested Newt populations. Site has ancient woodland and trees. Highways access to the site very poor with access off Scudamore Road which will accumulate with site 525 development. Planned new access roads will have issues including increase in vehicle movements and air quality damage. Main access off Ratby Road in Blaby. Household Waste Recycling Centre not listed in Reg 18 consultation. This would bring more vehicles to the area adding to further congestion, air pollution and flies. Golf course absorbs huge amounts of rainfall.	145 (Local resident)	Details of any proposed development on strategic sites will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design, and Policy NE02 Biodiversity Gain at application stage. The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023). As per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments

		<ul> <li>will also be expected as part of any planning application for the site.</li> <li>The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.</li> <li>A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).</li> </ul>
If the area is destroyed, we will no longer have a 'high scoring green wedge' in the area. Moved to this area to be in a village and enjoy the open spaces. Kirby Frith Green Wedge meets all the functions of the green wedge. Listed in an area of high biodiversity, development will cause enormous damage to this wildlife site. Great Crested newts and ancient woodlands and trees on site. Highways access to the site is very poor, Feed onto Scudamore Road which is very busy, which development of site 525 will also feed onto. New access road will be needed and one option is off Ratby roundabout in Blaby. Higher vehicle movements will further damage air quality. Household Waste Recycling Centre not listed during Regulation 18 consultation, which would bring more vehicles into the area and add to congestion, air pollution, flies and odours.	146 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023). Details of any proposed development on strategic sites will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design, and Policy NE02 Biodiversity Gain, at application stage.

The FWPGC was sometimes closed due to huge amounts of rainfall which was absorbed by the golf course.		As per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06 Highways Infrastructure, Policy T01 Sustainable Transport Network, and Policy T03 Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site. The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations. A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
Local Plan does nothing on the Former Western Park Golf Course to protect this invaluable open space. Still working as a Green Wedge lessens the effects of the M1/A46 corridor including air quality issues. Building on Green Wedge already eroded the Green Wedge land and the importance of this.	147 (Whetstone Parish Council)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 –

Allocation of the site goes against NPPF paras 98, 174, 179, 180a/c, 182 and 185. Suggestion that easy to accommodate a further 450 homes across the agreed SoCG.		Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023). The Council believes that the policy adheres to the NPPF.
The Local plan does not contain policies for waste and minerals. The Leicester Waste and Minerals Local Plan details guidance about the allocation of sites, objection to the recycling centre prior to a guidance document being available. Recycling centre not listed on the Regulation 18 Local Plan. No documents to confirm that the HWRC complies with policy FMWN01. Waste development should be on brownfield land where possible. Site is within a high scoring portion of green wedge, which goes onto say that this is outweighed by the development opportunities. This is not an acceptable approach. Questions how high scoring green wedge is of less value than development and the justification for this. Flooding will be an issue with an increase in run off created by additional housing. Diagram 10 on page 150 of the Local Plan shows three heritage assets including a Roman road. Concerns about highways access and negative impacts to traffic levels, air quality and pollution. Green space is important to the wellbeing of the population and good for mental and physical wellbeing.	148 (Local resident)	The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations. The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023). A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)). Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The
		masterplan will propose appropriate highways

		access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.
<ul> <li>Half of the open space network is in the Green Wedge which was allocated in 2006. Need to retain to protect Glenfield and Braunstone Frith from the effects of the M1 corridor.</li> <li>Part of Green Wedge was lost when Glenfield Park was permitted by Blaby</li> </ul>	150 (Lee Breckon Leicestershire County and Blaby Councillor)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped
District Council. Area needs to be used as a country park and share the ongoing costs of maintenance between the city and county.		green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
The site is within high scoring Green Wedge land. Disagree with the assertion that the development opportunity outweighs the fact that is a high scoring green wedge, as this is just an opinion.	151 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the
Green spaces are paramount for environmental, climate change, mental health and physical health reasons.		city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge
The Council need to work with neighbouring authorities when it comes to planning. Villages of Glenfield, Kirby Muxloe, Groby and Ratby are continuing to grow so need to protect green spaces.		boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
Ongoing consequences of flooding, ecology, trees and hedgerows, archaeology, heritage, air quality, traffic noise, highways access and sports provision. Using land for development will create massive amounts of runoff which will overflow into existing watercourses and sewerage systems.		The Council have assessed the archaeological constraints on the sites. Any development coming forward would be expected to consider these constraints in the development design
Questions why the council would build over heritage elements including three heritage assets shown on diagram 10 on page 150 of the Local Plan.		and layout. Archaeological assessments and Heritage Impact Assessments will be required as

Ripping out an area which contains thousands of established trees which creates a habitat for hundreds of species, seems to be calamitous, out of touch and seen as being a massive mistake for future generations.		part of the planning application process in accordance with policies HE01 and HE02.
The proposal will cause significant harm to the Green Wedge and will result in a loss of any positives (e.g., flood management). Site access is poor and any new access roads will cause further destruction with higher movements which will further damage air quality. The area has high biodiversity, and the proposed development would have untold damage to wildlife. Any construction phase will have a huge risk of pond contamination. Site contains ancient trees and woodlands also. Household Waste Recycling Centre was not listed in the Reg 18 consultation and therefore no objections were possible, this would bring more vehicles adding to congestion, air pollution as well as flies and odours.	154 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023). Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site. Details of any proposed development on strategic sites will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design, and Policy NE02 Biodiversity Gain, at application stage. The household waste recycling centre was added to the site allocation between the
		regulation 18 and regulation 19 stages of Local

		Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.
No belief that the development of this site which has community benefit and is a haven to wildlife could lead to Biodiversity Net Gain. Not credible or evidenced that 3.48Ha of open space can improve on the 52.1Ha that has naturally developed over the years and goes against Council's own Green Infrastructure Strategy.	155 (Local resident)	Details of any proposed development on strategic sites will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design, and Policy NE02 Biodiversity Gain, at application stage.
Development of the site is in direct contravention with NPPF para 98. Much needed space for the local residents in Kirby Frith, Glenfield and kirby Muxloe to walk, jog, picnic and enjoy nature. This is very different from other green spaces in Leicester as this is already partly rewilded, has a hugely diverse selection of tree species and greater value in terms of biodiversity.	157 (Local resident)	Details of any proposed development on strategic sites will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design, and Policy NE02 Biodiversity
Importance of access to nature for people's mental and physical health which they can reach on foot and without the use of the car. In contradiction with para 179 and 180 of NPPF as there is a wonderful collection of diverse habitats.		Gain, at application stage. The site has been proposed for green wedge de- designation as it is the Council's view that the
Several species protected by law including badgers and great crested newts are on site and development would cause these to cease to exist. They cannot escape and view green corridors into another wild area.		location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped
Objection to Household Waste Recycling Centre to be built on the site due to significant quality of life impact to residents, including generation of noise, extra pollution from HGV's entering and leaving the site, unpleasant odours. This contravenes NPPF para 185.		green wedge. Reasons for revising green wed boundaries can be viewed in Document TP/3 Leicester Local Plan 2020 to 2036 Green Wed Topic Paper (2023).
The site fulfils all four criteria of the Green Wedge criteria, and the council cannot simply change this designation on a whim as this is possibly illegal and certainly immoral.		Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways
No obvious access points to arterial routes and links such as Blood Hill roundabout are going to massively increase traffic congestion, which have significant negative impacts on residents.		access for the site, and this will be assessed against Local Plan Policy T06 Highways Infrastructure, Policy T01 Sustainable Transport Network, and Policy T03 Accessibility and

<ul> <li>The Council have failed in their Duty to Cooperate as local residents or resident groups have not been consulted and has resolutely declined to meet or communicate in any way with the members of 'Western Golf Course – Area Action Group.' Emails and any other attempts to contact the council have been ignored.</li> <li>Council should consider different areas for development because of the biodiversity and amenity value of this space for local people. Suggestion that the large tract of land which extends from Kirby Castle towards Leicester Forest East which is of similar size and has zero value in terms of biodiversity could be considered as an alternative.</li> </ul>		Development. Transport Impact Assessments will also be expected as part of any planning application for the site.
<ul> <li>Policy does not comply with NPPF paras 98, 174, 179, 180a &amp; c, 182 and 185.</li> <li>The Former Western Park Golf Course is officially listed as an area of high biodiversity, which development would have a massive impact on, including on protected species in the area such as great crested newts. This would have significant and irreplaceable impacts.</li> <li>The site has a high scoring portion of green wedge as outlined in para 4.38 of Green Wedge Addendum report (2020).</li> <li>Site access to the site is poor and Scudamore Road is already congested from both industrial estate and existing residential area traffic. Site 525 nearby is also listed for 58 dwellings which depend on the same road access which will have many issues. Further destruction by roads being created will cause heavy congestion and direct impacts to throughput and air quality.</li> <li>Household Waste Recycling Centre was not listed at Regulation 18 consultation and would contribute to increased vehicle levels, congestion, air pollution and odours. The site is a green space that naturally absorbs rainfall, hard surfacing will increase the risk of flooding.</li> </ul>	160 (Local resident), 163 (Local resident)	Details of any proposed development on strategic sites will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design, and Policy NE02 Biodiversity Gain, at application stage. The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023). Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06 Highways Infrastructure, Policy T01 Sustainable Transport Network, and Policy T03 Accessibility and

		Development. Transport Impact Assessments will also be expected as part of any planning application for the site. The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.
No opportunity to object to the addition of the Household Waste Recycling Centre which has not been included within the Regulation 18 consultation. Already an industrial recycling centre on the Scudamore Road industrial estate. Further sites will increase odours pollution to the air quality in the area, major issues with flies in the area. Road network is already poor and any further traffic will encourage congestion and impact air quality severely.	161 (Local resident)	The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.
<ul> <li>If golf course is taken away these will be a massive increased risk of flooding.</li> <li>The site is listed as a high biodiversity site and development will cause untold damage to wildlife.</li> <li>Development should be refused due to the ancient woodlands, goes against NPPF para 180.</li> <li>The site meets all four functions of the Green Wedge which provides a source of nature and clean air to prevent flooding and give access to nature for local residents. This would make a fantastic rewilding project. Refer to NPPF paras 98, 174, 179, 180 &amp; 185.</li> </ul>		Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06 Highways Infrastructure, Policy T01 Sustainable Transport Network, and Policy T03 Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.
		A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2

		<ul> <li>Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).</li> <li>Details of any proposed development on strategic sites will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design, and Policy NE02 Biodiversity Gain at application stage.</li> <li>The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).</li> </ul>
<ul> <li>Blaby District Council will continue to work with LCC to deliver important strategic sites and contribute to meeting Leicester and Leicestershire's housing needs as set out in the most recently agreed SoCG. Blaby have yet to set a settlement hierarchy and currently working through site selection process.</li> <li>Blaby District Council will continue to explore comprehensive schemes and joint working across boundary sites where appropriate and advantageous to the needs of the district.</li> <li>Policy SL02, whilst it contains the unamended diagram 2, is not compliant with the NPPF. Recommendation for compliance that diagram 2 is amended to remove the land within Blaby and make this consistent with the Policies map and Strategic sites document.</li> </ul>	162 (Blaby District Council)	Leicester City Council welcomes ongoing cooperation with Blaby District Council. Leicester City Council will amend diagram 2 in compliance with Blaby DC's request. The Council is preparing more information around the deliverability of sites which is to be shared in due course.
Detailed information that would allow for further assessment and understanding regarding the delivery of housing proposed has not been		

included within the Local Plan evidence base. Proper scrutiny of the proposed housing delivery cannot take place without detailed breakdowns. This would help with understanding of housing capacities put forward and that are included within the trajectory.		
Need to revise the Local Plan in accordance with the stated legislation regarding site 702.	172 (Local resident)	Details of any proposed development on strategic sites will be assessed against Policy T02
The Green Wedge has become a crucial green space between industrial estates the M1 and the A46 and within a short distance of residential, primary schools, Glenfield Hospital.		Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design and Policy NE02 Biodiversity Gain at application stage.
Site is a carbon filter with flourishing wildlife.		
It would be sacrilege to bulldoze the area for the purpose of housing and 'improvement.'		The Local Plan prioritises new housing development on brownfield sites in the Central Development Area, which is planned to
Development would remove the present green boundaries between numerous existing housing settlements.		accommodate 6,286 dwellings, i.e., c. 30% of the city's planned housing provision, over the
Questions why the numerous brownfield sites are not being built on in favour of destroying the green land that is there.		course of the Local Plan period (Table 1, pp.49- 50 of Document SD/2 Leicester Local Plan 2020- 2036 Submission (Regulation 19 publication) Plan (January 2023)).
Site 702 is a crucial Green Wedge land adjacent to the M1 motorway, A46 carriageway and several industrial estates.	201 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the
Mature area of open space has been a green oasis amidst the pollutants. Absurd to destroy this established air filter when the plan states the ambition to become a low emission city in para 2.12.		location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge
The space is used by the community to experience the great outdoors and the need to stay local to reduce carbon emissions.		boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge
Rewilding has taken over in recent years to become a crucial habitat for wildlife, many have been ousted from their previous areas due to the development of nearby warehouses.		Topic Paper (2023). Details of any proposed development on strategic sites will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03
		Open Space in New Development, Policy OSSR03

		Landscape Design and Policy NE02 Biodiversity Gain at application stage.
The site is listed officially as an area of high biodiversity, NPPF paras 180a and c. Development of the site will cause huge wildlife damage, including to Great Crested Newts. Huge risk of pond contamination during any construction phase. Green Wedge Addendum (2020) states in para 4.38 that Kirby Frith Green Wedge meets all four purposes of the Green Wedge. The area helps with health both mentally and physically, Highways access to the site is very poor and Scudamore Road is very busy. Site 525 Fulford Road which plans to add 58 dwellings which will also feed onto Scudamore Road, new roads will cause further destruction as well as to air quality. The Household Waste Recycling Centre was not listed on the previous regulation 18 so nobody was able to provide an objection. This would affect the air quality and lead to more flies and odours. The golf course has been known to flood and the problem is getting worse with global warming. There is evidence on the site of a Roman Road.	202 (Local resident)	
		access for the site, and this will be assessed against Local Plan Policy T06 Highways Infrastructure, Policy T01 Sustainable Transport Network, and Policy T03 Accessibility and

		<ul> <li>Development. Transport Impact Assessments will also be expected as part of any planning application for the site.</li> <li>A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).</li> <li>The Council have assessed the archaeological constraints on the sites. Any development coming forward would be expected to consider these constraints in the development design and layout. Archaeological assessments and Heritage Impact Assessments will be required as part of the planning application process in accordance with policies HE01 and HE02.</li> </ul>
The proposal is completely unsound. It is one of the green spaces left readily available for residents of Glenfield to use without having to travel further. The Former Western Park Golf Course is a regularly frequented site for the local community and development goes against NPPF para 98. This will be infill development with very limited access to quality green space. There is no suggestion of creating a similar space of the same quality anywhere accessible to the population.	204 (Local resident)	Details of any proposed development on strategic sites will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design and Policy NE02 Biodiversity Gain at application stage.
The proposed site is situated between Glenfield, a proposed new high quality economic development site (Policy E04), warehouses at Optimus Point and the M1. Failure to see how this makes it suitable for residential development. Currently some of the green space that does not add to traffic and air pollution in the area and acts as a sound and site barrier.		

Insufficient community involvement in the preparation of this plan. Considerable local opposition to the plan to build on what has been for many years accessible open green space well use by city and county residents.	205 (Local resident)	Consultation has been carried out in line with the Statement of Community Involvement and Addendum.
No evidence the resident protected and designated LWS will be adequately protected and preserved.		Details of any proposed development on strategic sites will be assessed against Policy T02
Plan should be modified to ensure sufficient open green space is set aside for public access. Far too smaller area for retention of open space (6% of the total area).		Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design and Policy NE02 Biodiversity
Veteran and ancient trees must be protected.		Gain at application stage.
Development will have detrimental effect on the health of the local population (fresh air, exercise and access to nature). Questions whether the local health authority have been consulted.		
Suggested modification to come up with an acceptable compromise by increasing accessible open space and evidence to protect protected species and result in biodiversity net gain. Should have a 'right to nature.'		
Current plans do not match the Local plan for site 702 in paras 2.11, 2.12, 2.22, 2.33, 2.36, 3.2	207 (Local resident)	The Council believes that the site allocation is in compliance with all aspects of the Local Plan.
Serious concerns over the impact of the proposed development.	219 (Local resident)	A flood risk assessment will be undertaken on
Area is at risk of flooding, there are frequent floods on Kirby Road and the Golf Course which will be significantly worse with heavy development.		the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2
Site meets all four functions of the Green Wedge and used daily for recreational activities improving mental health and wellbeing.		<ul> <li>Leicester Local Plan 2020-2036 Submission</li> <li>(Regulation 19 publication) Plan (January</li> </ul>
Development should be kept to a minimum and as many trees as possible preserved.		2023)). The site has been proposed for green wedge de-
Recycling centre wasn't included in previous consultation which would bring further heavy vehicle use to the area, adding congestion, air pollution and flies and odours.		designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge

		boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023). The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.
An essential green wedge that helps balance the pollution from the A46 and M1 with a vital space for the maintenance and enhancement of nature and biodiversity. Safe space for informal play, recreation and exploring wildlife.	221 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs
Key part in improving air quality, carbon absorption and managing flood risk.		the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge
Brownfield sites should be redeveloped to allow the preservation of this essential space and yet still allow for the creation of new homes. Development goes against all the environmental policies set.		boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
		Details of any proposed development on strategic sites will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design and Policy NE02 Biodiversity Gain, at application stage.
		The Local Plan prioritises new housing development on brownfield sites in the Central Development Area, which is planned to accommodate 6,286 dwellings, i.e., c. 30% of the city's planned housing provision, over the course of the Local Plan period (Table 1, pp.49-

		50 of Document SD/2 Leicester Local Plan 2020- 2036 Submission (Regulation 19 publication) Plan (January 2023)).
Strongly oppose the building on the former Western Park Golf Course, for various reasons, including traffic congestion, traffic noise, air quality, loss of green wedge, loss of an important recreational area, threat of flooding, threat to trees and woods, threat to ponds, loss of habitat, loss of a settlement separation area, problems associated with Household waste recycling, highways access. Only one narrow access road on Scudamore Road and no agreement from Blaby Council to use Ratby roundabout as highways access. Loss of green space at odds with Health Impact Assessment.	222 (Local resident)	<ul> <li>Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06 Highways Infrastructure, Policy T01 Sustainable Transport Network, and Policy T03 Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.</li> <li>A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).</li> <li>Details of any proposed development on strategic sites will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design and Policy NE02 Biodiversity</li> </ul>
	226.0	Gain at application stage.
Chapter 4 Strategy for Leicester does not demonstrate how the Strategy has been positively prepared in a way that shows it contributes to the mitigation of climate change and therefore it is unsound.	226 (Local resident)	Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed
Local plan continues to promote an increase of highway capacity, which will in turn generate more traffic and congestion elsewhere.		against Local Plan Policy T06. Highways Infrastructure, Policy T01 Sustainable Transport

Negative impacts on environmental factors which includes the development of greenfield land and vehicle movements. This suggests a conflict with dealing with matters such as climate change that could affect land deliverability.		Network, and Policy T03 Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.
<ul> <li>No information has been provided to the infrastructure that will be sought for this site, how such infrastructure would contribute to the mitigation of climate change or how it would be funded and delivered.</li> <li>Previous policies around walking, cycling and public transport were not effective and shows that lessons have not been learnt from this in policies and monitoring.</li> <li>Strategy Chapter must be revised to demonstrate the city council is serious about the need to show that the Plan contributes to the mitigation of climate change, cares about Green Wedges and the environment and does not rely on the delivery of more road capacity leading to more traffic and more congestion.</li> </ul>		Preparing for, limiting, and adapting to climate change.is one of the Local Plan's key objectives (p. 27). These inform and support the overarching vision of the Plan and underlie plan policies. Chapter 4: Strategy for Leicester acknowledges the importance of mitigating and adapting to climate change in its approach to housing (para. 4.10 "ensuring the efficient use of land and seeking to achieve higher densities"), in seeking to locate development in sustainable locations (Policy SL01 Location of Development), and in placing importance of the city's green infrastructure network (paras. 4.21 - 4.23)
Kirby Frith Green Wedge currently meets the four purposes of a Green Wedge which is described in para 4.38 of Green Wedge Addendum (2020). Despite importance of Green Wedges described in the Plan and NPPF repeatedly, there are calls for it to be developed under the claim it no longer has Green Wedge status. Green Wedge has strongest measured biodiversity of the sites and received the largest number of representations from the community. The two reports (Green Wedge Review and Addendum) mentioned are highly positive regarding Green Wedges and do not in any way underpin any policies in the Plan relating to development on Green Wedges.	228 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
Policy OSSR01 largely mirrors NPPF 13 para 149 insofar as development on Green Wedges which MAY be considered, NONE of which includes waste recycling centres, gypsy/traveller sites, or indeed, houses or commercial buildings except for 'limited affordable housing', (this last item being absent from OSSR01).		An application for change of use to temporary stopping place (2 pitches) for gypsies & Travellers was refused in 1999 (19990808)

<ul> <li>Planning permission for gypsy &amp; traveller site has previously been refused.</li> <li>Objection that the development clearly outweighs the benefits of this Green Wedge and use of the Green Wedge is only allowed in 'very special circumstances' as per the NPPF para 148. The site has the highest biodiversity scores of all the sites.</li> <li>Site contributes to the reduction of flooding; flooding is already happening on Kirby Road as a result of past development.</li> <li>Mature tree cover is a significant proportion of the site for CO2 absorption and shade. Substantial emissions will result from the development process.</li> <li>Difficult to see how biodiversity levels could be sourced to current levels.</li> <li>Additional vehicles will enormous and negatively affect air quality and Greenhouse Gas emissions. Considerable amounts of noise and traffic will be made by construction traffic and surrounding roads are too narrow to deal with additional traffic.</li> <li>Representation makes several references to paras in Health Impact Assessment (2022) which would be lost with the development.</li> <li>To make this sound the Council need to provide evidence that the benefits of the development clearly outweigh the potential harm to the Green Wedge.</li> <li>No documents are available to confirm that stated Household Waste Recycling Centre on Policy SL02 complies with Policy FMWN01.Objection to the inclusion of a waste recovery centre as not in previous consultation in 2020 (Reg 18 Local Plan) thereby denying the opportunity to voice those reasons.</li> <li>Recommendation to remove the site until information becomes available and the community can comment on this.</li> </ul>	230 (Local resident)	A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)). Details of any proposed development on strategic sites will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design and Policy NE02 Biodiversity Gain at application stage. The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit
In terms of sustainability, all of the strategic sites perform poorly according to the sustainability appraisal. Despite the sustainability rating and opposition/feedback from residents, the city council are still insisting on these sites as the final list of sites.	231 & 232 (Local residents)	representations. The Council have explored alternative sites to address housing needs, this is outlined in the site selection methodology (EB/HO/5).

There is s reoccurring factor highlighted in the sustainability appraisal for the strategic sites – the remoteness in terms of public transport, and the existing green wedge designation.

I think the council needs to go back and explore other alternative sites to address housing need, including:

- Reviewing sites such as empty business space and brownfield land.
   The impact of covid-19 means people are working at home more now, business/operation have closed down, and there is likely to be more empty shops on the high street.
- There are two strategic sites that council have failed to consider. Severn Trent Water land and Leicestershire County Council offices.
- Unlocking housing potential in student accommodation, that is now surplus to requirement due to covid-19.
- Unlocking housing potential in empty homes
- Reviewing and reducing lease terms on occupied council homes. Council homes should not be for life, if your financial circumstances improve and you can afford to buy or rent privately, and the same principle, should apply for council house ownership. This ensures fair distribution of resources to those who need it.

Furthermore, these proposed sites are within Beaumont Leys ward, which has been identified as one of the more deprived areas in Leicester. By increasing household in Beaumont Leys as a result of the new plans, there will be a negative impact on existing residents, as there will inevitably be increased pressures on health services, education and employment. Also due to loss of green space, this will have an adverse effect on the mental health and wellbeing of residents. Details of any proposed development on strategic sites will be assessed against Policy T02 Climate Change and Air Quality, Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design and Policy NE02 Biodiversity Gain, at application stage.

The representors have suggested two sites for allocation which are outside the city's administrative boundaries. The City Council cannot allocate sites outside its boundaries.

Empty homes have been considered in the calculation of overall housing need. This has been explained in the Local Housing Needs Evidence February 2022 update.

Any future supply and development will need to comply with housing mix and type as specified in the housing mix policy (HoO3) or any future evidence update.

The Local Plan prioritises new housing development on brownfield sites in the Central Development Area, which is planned to accommodate 6,286 dwellings, i.e., c. 30% of the city's planned housing provision, over the course of the Local Plan period (Table 1, pp.49-50 of Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).

The proposed development as per SL02 go against previous reports. The gold	234 (Local resident)	The site has been proposed for green wedge de-
course is essential green wedge which help preserve the identity of Glenfield		designation as it is the Council's view that the
as a village community. This was acknowledged in the February 2020 Green		location is sustainable and the benefits to the

Wedge Review Addendum Report para 4.38. where the golf course is described as "high scoring green wedge" and "prevents the merging of settlements."

Chapter 6 refers to managing flood risk. The former western park golf course absorbs a huge amount of rainfall and has been itself severely flooded at times over the years. Developing this land will just increase flood risk to the surrounding areas. Increased rainwater runoff will overwhelm the sewers.

A household recycling centre has now been proposed under SLO2. This has never been included before in consultations and was definitely not listed on the Regulation 18 public consultation. So, there has never been on opportunity to object. This has been sneaked in to the proposals. My objection here is to the extra volume of traffic that will be created and the possible air pollution, smells and flies that will be created. The roads in this area are already congested and would be overwhelmed by the amount of housing proposed, let alone the extra vehicles going to a recycling centre. There is already sufficient recycling centre in the surrounding area and an extra one on this side of Leicester is just not needed and is totally an inappropriate place to suggest one. This should not be sited near domestic dwellings.

The SL02 former western park golf course proposal will generate far too much traffic. Scudamore road is already heavily congested. The preferred access off of Ratby roundabout is in the Blaby council area so how is it appropriate for the city to develop land it doesn't even own. It will also add to air and noise pollution.

SL02 goes against NPPF paragraphs 180a and c, the former western park gold course is officially listed as an area of high biodiversity. The area has historic woodlands which much roman archaeology which will be destroyed if developed upon.

Chapters 7 and 10 refer to health and wellbeing and open space and recreation and desire to "influence the environment to make healthier choices more accessible." (Para 7.4) Well that is what the former wester park golf course does. But will not if developed on. city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).

A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).

The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.

Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06 Highways Infrastructure, Policy T01 Sustainable Transport Network, and Policy T03 Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.

	NE02. Biodiversity Gain at application stage. The Council have assessed the archaeological constraints on the sites. Any development coming forward would be expected to consider these constraints in the development design and layout. Archaeological assessments and Heritage Impact Assessments will be required as part of the planning application process in accordance with policies HE01 and HE02.
Brownfield and old derelict sites around the city should be re-developed before such places are considered, and when they are considered, they should take such a large area under consideration.236I can understand some of the area being used for development (ideally half of the current site). This would allow wildlife to mostly remain and still thrive in the area.1The reduction of proposed area on the former western park golf course, half of the current proposal would be a good balance still providing a green open space for both new and old residents alike, while going some way to cover housing need for the city. Industry units could also be scaled back and plans for Household Waste Recycling be moved to another non-residential place in the city, potentially giving more space for dwellings in that half of the current area proposed.	<ul> <li>(Local resident)</li> <li>The Local Plan prioritises new housing development on brownfield sites in the Central Development Area, which is planned to accommodate 6,286 dwellings, i.e., c. 30% of the city's planned housing provision, over the course of the Local Plan period (Table 1, pp.49- 50 of Document SD/2 Leicester Local Plan 2020- 2036 Submission (Regulation 19 publication) Plan (January 2023)).</li> <li>Details of any proposed development on the site will be assessed against Policy NE02. Biodiversity Gain, Policy NE03. Green and Blue Infrastructure, and Policy OSSR03. Open Space in New Development at application stage.</li> <li>Overall strategic need for employment land, as outlined in Policy SL01. Location of</li> </ul>

		back the employment land proposed for the site.
Site 702 is currently designated as green wedge as per the previous local plan dated 2006. Green wedges serve as a buffer between urban areas, it provides a "green lung" for the city and the surrounding area. The former Western Park Golf Course has the strongest measured biodiversity of all the strategic sites and passes all four tests of a green wedge. There in my opinion this site should remain as green wedge and the proposed development should be refused.	237 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
Referring to NPPF paragraphs 180a and c. The former western park golf course is officially listed as an area of high biodiversity. Development will cause enormous damage to this wildlife site. Numerous ponds with officially recorded Great Crested Newt populations. Huge risk of pond contamination during any construction phase. The site does contain ancient woodlands and trees. Accordingly, permission for this site to be developed should be refused. The golf course absorbs huge amounts of rainfall. It was sometimes closed for golf due to being waterlogged. There is evidence a roman road crosses the course and roman pottery sheds have been found. The roman road is shown on the Local Plan map page 150. Highways access to the site is very poor. It feeds on to an already busy Scudamore Road which serves an industrial estate and a residential area. Another listed site, site 525 Fulford Road plans to add 58 dwellings which will also feed on to Scudamore Road. Any planned new access roads will have many issues. The main preferred access road is off Ratby roundabout, but this is outside the city boundary in Blaby. Any new access roads will cause further destruction. Much higher vehicle movements will further damage air quality.	240 (Local resident)	The Council considers that the location of the site is sustainable and the benefits to the city through allocation of the land outweighs the harms. Details of any proposed development on the site will be assessed against Policy NE02. Biodiversity Gain, Policy NE03. Green and Blue Infrastructure, and Policy NE04. Ancient Woodland, Veteran Trees, and Irreplaceable Habitats at application stage. A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
		The Council have assessed the archaeological constraints on the sites. Any development coming forward would be expected to consider

Objection as this area has been subject to an abundance of wildlife, flora and fauna for many years and even more since the golf club closed. There are some trees that are about 100 years old. LCC badges themselves as being environmentally friendly and is allegedly 'accountable in its tackling of the climate emergency.' Building on the Old Western Park Golf Course goes against these comments that have been taken from your own policy.	243 (Local resident)	<ul> <li>these constraints in the development design and layout. Archaeological assessments and Heritage Impact Assessments will be required as part of the planning application process in accordance with policies HE01 and HE02.</li> <li>Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.</li> <li>Sites assessments have taken transport/highway comments into account.</li> <li>The Council considers that the location of the site is sustainable and the benefits to the city through allocation of the land outweighs the harms.</li> <li>Details of any proposed development on the site will be assessed against Policy NE02. Biodiversity Gain, Policy NE03. Green and Blue Infrastructure, and Policy NE04. Ancient Woodland, Veteran Trees, and Irreplaceable Habitats at application stage.</li> </ul>
Para 14.8 speaks about the separation of communities by green wedges to be maintained to ensure a sense of place and community spirit. The arbitrary	245 (Cllr Roy Denney of Blaby District Council)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs

redesignation of green wedges (14.10) is directly contrary to this aim, the Western Park Golf Course does not maintain separation.		the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
Concerns that proposed allocation would include a large area of green open space incorporating a Local Wildlife Site. Policy wording should be strengthened with the respect of the provision of Green Infrastructure, which should set out the requirements for the protection and creation of connected Green Infrastructure throughout the site for the benefit of people and nature. Opportunities should be taken to connect to the surrounding wider Green Infrastructure network. The long-term maintenance and management of these areas should also be agreed with the developer at the early stages of the planning process. Suggestion for the following policy wording to be included: Opportunities to integrate and connect new and existing green infrastructure throughout the site will be taken to protect, enhance and expand the green infrastructure network. Where new or improved green infrastructure is delivered as part of the development, the developer should make appropriate provision for its long-term management and maintenance.	259 (Natural England)	Ongoing dialogue with Natural England. Local Plan (Document SD/2 Leicester Local Plan 2020- 2036 Submission (Regulation 19 publication) Plan (January 2023)) Policy SL02. Strategic Site 1: Former Western Park Golf Course requires provision for green infrastructure on the site. Per para. 4.26, a masterplan for this site will be required and must include provision of green infrastructure. The masterplan for development of the site will be assessed against the criteria of Policy NE03. Green and Blue Infrastructure. The suggested additional policy wording will be considered as a modification.
Objections based on a number of matters including the following. Greenspace is within minutes of the motorway, vast amount of trees are dispersing and removing pollutants from the atmosphere. New homes and industrial units will bring a number of cars, lorries and traffic to the area. If the green space goes the flooding in Glenfield would be even worse than it is now, as development would mean that rainwater cannot be absorbed. Questions what will happen to all the wildlife. Comments that the wellbeing of people should be considered. Glenfield village has already seen a lot of new traffic over recent years because of the housing estates that have been built.	262 (Local resident)	The Council considers that the location of the site is sustainable and the benefits to the city through allocation of the land outweighs the harms. A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).

		Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.
The supporting text for the proposed strategic sites should be widened to refer to the cumulative and cross-boundary transport impacts of these sites on the north-western part of the Leicester Urban Area. Regarding para 4.26, the wording of the final sentence should be amended to include reference to other highway authorities, i.e., Leicestershire County Council and National Highways in the light of this site's likely impacts on roads for which they are the responsible authority.	267 (Leicestershire County Council)	Ongoing discussions with the County Council regarding cumulative and cross-boundary transport impacts of the strategic sites. The Council believes that it is made sufficiently clear in the supporting text for the policy, in
Policy SL02 should be strengthened to more explicitly acknowledge that the allocation is part of a larger cross-boundary development including the potential development land in Blaby District and include specific wording setting out a requirement for comprehensive cross-boundary master planning of the site/development area. If unaddressed at this time, these issues could have potential implications for the deliverability and soundness of the plan.		particular in para. 4.24, that the allocation is part of a larger cross-boundary development. Both the policy itself and the supporting text make clear that the City Council will work jointly with Blaby District Council in delivering this site.
Larger housing developments have no mention of primary school infrastructure required. There is no mention as to whether these schools will be placed in the city or the county. The Plan needs to be more robust in identifying locations and what partnership working is required to fulfil the infrastructure required.		The amount of school provision required for growth under the local plan has been assessed and is set out in Chapter 6 of Document EB/DI/1a Infrastructure Assessment with Infrastructure Delivery Schedule (2022) and in Document EB/DI/2 Infrastructure Assessment (Updated) (Excluding Transportation) – Final Draft (January 2023). The schools planned for in

		the local plan will meet current and forecast future need as informed by the evidence.
Objection to the site as it will not improve the health and wellbeing of local residents or protect and enhance the natural environment including green infrastructure and biodiversity.	280 (Local resident)	Details of any proposed development on the site will be assessed against Policy NE02. Biodiversity Gain, and Policy NE03. Green and
The site has extraordinary wildlife and protected species.		Blue Infrastructure at application stage.
Increase in pollution and historic Roman Road passing under the site.		The Council have assessed the archaeological
No development should take place on FWPGC site and brownfield sites should be used if housing is needed.		constraints on the sites. Any development coming forward would be expected to consider these constraints in the development design and layout. Archaeological assessments and Heritage Impact Assessments will be required as part of the planning application process in accordance with policies HE01 and HE02. The Local Plan prioritises new housing development on brownfield sites in the Central Development Area, which is planned to accommodate 6,286 dwellings, i.e., c. 30% of the city's planned housing provision, over the course of the Local Plan period (Table 1, pp.49-
		50 of Document SD/2 Leicester Local Plan 2020- 2036 Submission (Regulation 19 publication) Plan (January 2023)).
The commitment to master planning for the uses set out in the individual policies is welcomed.	282 (Harborough District Council)	Support welcomed for requirement for master planning on strategic sites.
The City Council is encouraged to maximise the residential capacity of these sites through the master planning process. It may be that higher densities can be achieved on these important strategic sites. Expressing the capacity of these sites in policy as minimums would give some room for potentially higher densities should this prove possible.		Capacities on sites are indicative and do not preclude a site coming forward for higher capacities and will be dealt with at planning application stage considering compliance with whole plan policies.

It is not clear how the historic environment has been fully considered in relation to Strategic Site 1: Western Park Golf Course in order to conclude that, in respect of the historic environment, the site would be developable at the anticipated level, suitable, achievable in the manner expected and, therefore, deliverable. Nationally important archaeology at this site would require further assessment and investigation before allocation of the site. No such assessment information provided in Local Plan process and it is unclear how the site allocation would meet the requirements of the Council's draft policies for the historic environment HE01 and HE02. It is recommended that information should be published as an appendix to the SHELAA or SA to demonstrate a positive approach to the historic environment in the plan process. Any further work should be undertaken in line with HE advice note 3: Site allocations in Local Plans and demonstrate that the anticipated development could be achieved at the site.	300 (Historic England)	Any known physical constraints including archaeology have been considered as part of site assessments and mitigations. Specialist comments have been taken into account in sites assessments.
<ul> <li>Kirby Frith Green Wedge meets all four purposes of the Green Wedge as stated in para 4.38 of Green Wedge Addendum (2020).</li> <li>Clear that the area is of natural beauty has become more of a wildlife haven where local people can access. This is because it on the doorstep and does not require people to drive. It allows people to exercise and good for mental health.</li> <li>Site is listed as an area of high biodiversity, refer to NPPF para 180 a &amp; c. Risk of huge pond contamination during construction phase.</li> </ul>	302 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
The site contains ancient woodlands and trees. The Household Waste Recycling Centre was not listed during the Regulation 18 consultation to allow for objections. This would bring more vehicles into the area, adding further to congestion, air pollution, flies and odours. Flooding the golf course absorbs huge amounts of rainfall. Evidence of a Roman Road shown on page 150 of the Local Plan.		Details of any proposed development on the site will be assessed against Policy NE02. Biodiversity Gain, Policy NE03. Green and Blue Infrastructure, and Policy NE04. Ancient Woodland, Veteran Trees, and Irreplaceable Habitats at application stage.
		Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways

		<ul> <li>access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.</li> <li>The household waste recycling centre was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.</li> <li>A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).</li> </ul>
Paras 2.11, 4.7, 4,24 and 4.26 do not comply with the NPPF paras 174a, b, c, d, e & f, 175, 179a&b, 180a&c, 182 and 185a, <b>b</b> & c.	304 (Local resident)	It is the Council's view that the Local Plan complies with national planning policy.
The appraisal of the site in appendix C2 of the Sustainability Appraisal, opportunities listed on page 106 of the Green Infrastructure Strategy (2015-2025) and the negative impacts listed in Appendix D of the SA are non-compliant with allocation.		The benefits that this proposed allocation provides towards meeting the city's housing and employment land needs outweighs the negative scoring in the Sustainability Appraisal.
It has been allocated for other uses that do not promote health. The SA ranks this site as overall 'red' and argues that there is no evidence that the outcome will be positive for housing and jobs as stated in the SA.		Details of any proposed development on the site will be assessed against Policy NE02.

<ul> <li>Policy will have a significant effect on the habitats site.</li> <li>Statement that development would be good 'to deliver new homes which are good for health; but negatively affect a Green Wedge and Local Wildlife Site' is an unbalanced statement as Green Wedge and LWS are essential for good health.</li> <li>Suggestion to achieve Biodiversity Net Gain 'possibly offsite' indicates the difficulties of achieving this onsite, no such provision is noted. Extension of development into Blaby will eliminate any possibility of biodiversity links.</li> <li>'Significant amount of new vehicle movements' during and post construction pose a significant threat to noise and air quality,</li> <li>Access to the site is extremely limited.</li> <li>Clear that protection of ponds from contamination will be difficult to achieve. Proposals in direct contradiction of the Authorities stated commitment to the environment and health and wellbeing. They fail to address inequalities.</li> </ul>		<ul> <li>Biodiversity Gain and Policy NE03. Green and Blue Infrastructure at application stage.</li> <li>Per para. 4.26 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.</li> </ul>
Paragraph 4.25 states that there will be 9.74 ha of employment Land, but Policy SL02 states that there will be 11.24 Ha of employment space. It is recommended that this is checked to confirm which hectarage is correct.	328 (Severn Trent Water)	To be considered as minor modification. Change figure in paragraph and add detail of HWRC in Para 4.25.
Objection to the site as the green space is very much appreciated by local residents and heavily used all year around. There are various bird and mammal species, as well as flora and wildflowers. Many of the trees are well established with many of them over 150 years old. The space also provides to improve mental health.	257 and 336 (Local residents)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
		Details of any proposed development on the site will be assessed against Policy NE02. Biodiversity Gain, Policy NE03. Green and Blue Infrastructure, and Policy NE04. Ancient

		Woodland, Veteran Trees, and Irreplaceable Habitats at application stage.
As drafted the Local Plan does not meet the requirements of paras 153 and 154 of the NPPF and is not aspirational in terms of para 16. States that the Council should use land holdings positively to insist on zero carbon for all housing developments to show a proactive approach to climate change. And future resilience of communities and infrastructure.	355 (Local resident)	It is the Council's view that the Local Plan complies with national planning policy. The Local Plan policies, particularly the policies in Chapter 6, go as far as possible to mitigate and adapt to climate change, whilst having to take into account whole plan viability.
The site has several 'red light' endangered species including buzzards, crested newts, badgers, and the merlin. Suggestion that the area would benefit from a water feature or a visitor centre which could be used to make profit instead of building on the golf course. The site is easily accessible from the M1 and in the middle of the country to allow for many visitors.	359 (Local resident)	Details of any proposed development on the site will be assessed against Policy NE02. Biodiversity Gain and Policy NE03. Green and Blue Infrastructure at application stage
It is illegal to build on land where protected species of wildlife are. Several other species of flora and fauna are also present. Suggestion that the area would benefit from a water feature or a visitor centre.	360 (Local resident)	It is the Council's view that the Local Plan complies with legislation and national planning policy.
Objection as the said area is a beautiful nature area which is beneficial to Glenfield. Development would destroy nature and create a filthy atmosphere. This would destroy a fairly quiet area.	363 (Local resident)	The site has been proposed for green wedge de- designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
Objection to the loss of green spaces and trees that cannot be replaced easily. Concerns over quality of life and that abandoned and derelict land could be used instead.	508 (Local resident)	Where green wedges have been de-designated in total or in part, these have been in locations which are deemed the most sustainable and

where the benefits to the city through allocation of the land outweighs the benefits of retaining the land as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic
Paper (2023).

## Policy SL03: Sites 262 & 579 – Land to the East of Ashton Green

Comments from: 11, 13, 44, 54, 62, 68, 72, 114, 115, 135, 143, 149, 158, 162 (Blaby District Council),165, 223, 224, 231, 232, 259 (Natural England), 267 (Leicestershire County Council), 279 (CPRE Leicestershire), 282 (Harborough District Council), 311 (Charnwood Borough Council), 337 (Department for Education), 338, 342, 352, 355

Main Issues Raised	Rep ID (name of Statutory Consultee or organisation where applicable)	Council's response
Whilst I agree with the locations, I do feel that this would potentially add an extra 2000+ cars to the local road network.	Local Residents: 11	The Council has extensive transport evidence which supports this allocation.
I would ask that you consider adding a new junction to the A46 to join Thurcaston directly to the A46 thereby alleviating all current and additional traffic problems.	Local Residents: 11	The Council has an extensive list of required infrastructure at the back of the plan (appendix 4) and the Council is satisfied that this is adequate to support the plan at this stage. A more specific infrastructure policy will be considered through the modification process.
The speed bumps on Ashton Green Rd need removing, the road widening and a 30mph speed camera installing.	Local Residents: 11	This detailed issue is not within the remit of the Local Plan.
Traffic slowing to 10mph to travel over the speed bumps does not aid traffic flow with a potential 2000 extra cars passing along twice daily.	Local Residents: 11	This detailed issue is not within the remit of the Local Plan.
With regards to the impact of one-way signal-controlled shuttle working at the railway bridge, the measure is not justified or based on proportionate evidence. Please consider the following: - 1. Recent electrical upgrade works, where for a significant amount of time, one-way temporary lights/controls were installed created a huge amount of traffic. 2. Basic traffic counting during peak times suggests that traffic will build to an extent past Highcliffe School. The school operates as a community hub offering swimming and MUGA/Sports facilities. 3. It's just not fair or proportional to "gamble" with the residents' (that stretch from Woodgate to the bridge) house prices. To explain, if you use the assumption that people will simply avoid the route does not	Local Residents: 13	These matters will be addressed at application stage.

come true, we lose an average of 10-15% off the value of our homes. 4.		
Examining the above and the need/behaviour of people: - a - There must be		
700 homes that access their property via Greengate lane, this will expand		
under this plan. Local people have to use Greengate lane from the A6 up to		
Woodgate Lane. b - non-locals use satellite navigation to avoid main routes c -		
Commercial vehicles use this route. The layout of the road when used as two		
way or one way creates situations where large vehicles have to stop on the		
bridge. d - The residents are free to park cars and vans outside the homes (on		
either side), the combination of excessive traffic, one way system, school		
children mixing on the bridge and road users jumping amber lights is not safe.		
5. There already has been over development within the local area, I note the		
school but in all other aspects your placing huge strain on local infrastructure.		
6. We currently enjoy relatively clean air; with big ques of traffic, we are		
fearful for our health. 7. Noise pollution isn't great at the current time; the		
traffic lights will cause even more noise. 8. I can point to a similar situation		
within the city where the local planners simply closed the bridge to all traffic.		
9. To exit my driveway regardless of forwards or reverse its physically		
impossible not to cross onto the far side of the road. With traffic lights I won't		
be able to safely exit my own home. The truth is Greengate Lane was not		
designed as a key vehicle route for public & commercial use between different		
parts of the county/city and whilst I'm not a fan of the housing development,		
but I accept progress is needed. However, the traffic lights on the bridge		
shows a desperation, lack of imagination and callous disregard to existing		
residents wellbeing. Please, please can I urge you to consider either keeping		
the bridge as it is or make the proposal in the true spirit of the planning		
framework and pedestrianize it. The latter seems the optimal solution for both		
the new city residents and settled residents of Greengate Lane in my humble		
opinion.		
The presented local plan policy SL02-SL06 are all large developments	Local Residents:	All sites proposed for allocation in the Local Plan
concentrated in the same area of county i.e., NW Leicestershire. What	44	are within the city. The City Council cannot
processes and procedures have been followed that have meant all these sites		allocate sites outside the city's administrative
are clustered in the same area? If these plans go ahead the disruption and		boundaries. However, the Local Plan (Document
dysfunction of the local transport infrastructure will have significant negative		SD/2 Leicester Local Plan 2020-2036 Submission
impacts on existing residents and the environment. The plan is supposed to be		(Regulation 19 publication) Plan (January 2023))

providing an expansion to housing and jobs for the county, why are other areas of the county then not being asked to accept some of the larger developments too?		proposes meeting 20,730 dwellings of its 39,424 dwelling housing need for the Local Plan period (as calculated using the Government's standard methodology plus the 35% uplift placed on the country's 20 largest urban centres). Therefore, 18,694 dwellings of the city's need is unmet and is proposed to be accommodated within the boroughs and districts of Leicestershire as set out in Document SCG/1 Leicester & Leicestershire Authorities - Statement of Common Ground relating to Housing and Employment Land Needs (June 2022). Regarding the locations of the strategic sites, there are extremely limited opportunities for the City Council to provide large scale strategic allocations within the city boundaries. All sites have been subject to the Sustainability Appraisal process (Document SD/4 Sustainability appraisal of the Reg. 19 Leicester Local Plan (September 2022) and Appendices), as well as a comprehensive site assessment process.
Re Traffic lights/One way signal-controlled units on a historical train bridge. 1. As residents we have already experienced one-way traffic light chaos when scheduled work took place. 2.Immediate traffic build up showed that at peak times the build-up was past the Primary school on Greengate LANE but also continued past Walnut Avenue and stretched towards Harrogate Drive (bus route). I witnessed stationary queuing drivers covering the school Zebra crossing and children under age 11 weaving in between transport which was highly dangerous. There is no crossing patrol officer on this crossing. Increased air pollution outside the primary school and the playgroup (from age 18 months old) is a likelihood. At normal route times there was still a build-up of revving polluting traffic which made it difficult to exit/enter driveways as no one would give way even when a funeral was trying to enter the Greengate	Local Residents: 62	Issues identified in points 1-6 are expected to be addressed at planning application stage. These would need to be in compliance with transportation (Chapter 16) and design (Chapter 8) policies. In relation to point 7, the Council have consulted neighbours as part of each consultation and continue to engage with Charnwood Borough Council through Duty to Cooperate meetings. An agreed Statement of Common Ground is available

Cemetery Gates. This restricted access to our property. 3. NOISE POLLUTION -		under SCG/5, which includes an agreed approach
Increased noise from traffic waiting to access the traffic lights (engine revving)		to the Green Wedge.
especially HGV drivers who ignore weight limit signs constantly when entering		
into Greengate LANE both ways. When the temporary traffic lights were in use		
cars/lorries were beeping their horns at the lights from sometimes 5 AM in a		
bid to make them change to green with a total disregard to residents in bed. 4.		
PRIVACY- we consistently found that when stationary drivers queued at the		
traffic lights, they stared up naturally into bedroom windows. This was evident		
when opening curtains and trying to get dressed. 5. LIGHT POLLUTION - will		
have an adverse impact on residents and surrounding wildlife e.g., Owls, Bats,		
Moths etc. Traffic lights will be on from dusk till dawn and cars waiting for the		
sequence change overnight. 6. It cannot be a sound argument put forward by		
Leicester City Council that traffic lights will put commuters off. It did not when		
temporary traffic lights were installed and where are these cars/vans and		
lorries going to go instead? I walk from Greengate lane to Wanlip lane		
between 1 and 2 times a week at peak times for work. I usually have to thread		
through stationery traffic on the Loughborough Road pedestrian crossing as		
the daily build up is a constant jam all the way to Redhill Island. Drivers have to		
cause havoc when leaving Greengate LANE to get over to Loughborough Road		
in a dangerous bid to join the queue of gain access to Sibson Road Birstall. This		
will always make Greengate LANE the rat run it has become. 7. The Green		
wedges between GCR and Leicester city seem to disappear without enough		
consultation between City and Charnwood. As we have been residents for over		
30 years an input would have been welcome because of the massive impact on		
he environment and wildlife. Our house deeds sadly show the demise of		
hese apparently green spaces. Greengate LANE is what it says on the tin. It		
was made for light traffic to cross a rail bridge and drivers will have no choice		
but to use and congest as there will be over 600 houses and a school to		
accommodate at Ashton Green.		
Local Plan Para 14.8 – Providing a 'green lung' into urban areas (including a	Local Residents:	Where green wedges have been de-designated ir
continuous link between open countryside and land which penetrates into	72	total or in part, these have been in locations
urban areas) This is essential for bees and other pollinating insects which are		which are deemed the most sustainable and
in decline, and this threatens our food security. Preserving green spaces is		where the benefits to the city through allocation
essential for the health of the country, as well as the local population.		of the land outweighs the benefits of retaining

Providing a recreational resource (including publicly accessible informal and formal recreation facilities) See also para 14.6 "Green wedges have a strategic function and extend beyond the city's administrative boundary into the Leicester Urban Area."		the land as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
Local Plan Para 14.1 "There are several background studies that will underpin policies in this plan. The main technical studies for this chapter are published on our website and will be updated as and when new studies are undertaken and completed." Green Wedge Review Joint Methodology (2011) Green Wedge Review (2017) and Addendum Report (2020)" – these two reports are highly supportive of the green wedge and therefore do not underpin policies in the Plan relating to deletion of green wedges. All the strategic sites, SL02 to SL06, are on current Green Wedge.		When a planning application is received for the site, the open space provisions within Policy SL03 and the local plan requirement for biodiversity net gain (Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023), policy NE02. Biodiversity Gain) will ensure that an overall net gain in biodiversity will be achieved.
Proposed development on Green Wedges will have a negative impact on the City's open space network. See para 2.31 "2.31 Leicester's open space network consists of a variety of spaces of differing size, quality and function, comprising almost 25% of the city area. Approximately half of the open space network is in the green wedges, which were allocated in 2006."		
I do not believe that building on the green wedge is justified or in line with national policies. The mitigations suggested will be insufficient.	Local Residents: 114	Where green wedges have been de-designated in total or in part, these have been in locations which are deemed the most sustainable and where the benefits to the city through allocation of the land outweighs the benefits of retaining the land as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
Local Plan Paragraph 14.8 • To prevent the merging of settlements (considering both physical separation and the perception of distance between settlements) • Guiding development form • Providing a 'green lung' into urban areas (including a continuous link between open countryside and land which penetrates into urban areas) •	Local Residents: 115	Where green wedges have been de-designated in total or in part, these have been in locations which are deemed the most sustainable and where the benefits to the city through allocation of the land outweighs the benefits of retaining the land as undeveloped green wedge. Reasons

<ul> <li>Providing a recreational resource (including publicly accessible informal and formal recreation facilities)</li> <li>See also paragraph 14.6 "Green wedges have a strategic function and extend beyond the city's administrative boundary into the Leicester Urban Area."</li> </ul>		for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023)
Para 14.7 states with regards to Green Wedges: "This gives them a strategic importance as they connect the city to the surrounding Leicestershire countryside."		
Local Plan OSSR01 "Development in green wedges will be permitted where: a) it does not adversely affect the predominantly open and undeveloped character of the green wedge."		
The council plans for all the strategic sites will clearly adversely affect the predominantly open and undeveloped character.		
All the strategic sites selected by council officers have a sustainability appraisal of red and amber. Despite the ratings, and opposition/feedback from residents, the city council are still putting these sites forward as the final list of sites that it wishes to be included in the Local Plan for submission for Examination in Public. A reoccurring factor highlighted in the sustainability appraisal for the strategic sites is the remoteness in terms of public transport, and the existing Green Wedge designation, which the council ignore by earmarking these sites for development.	Local Residents: 135, 229, 231, 232	The Council believes that the overall strategic need outweighs any negative scoring in the Sustainability Appraisal. Issues such as access to public transport and green wedge designation were considered as part of site assessments and mitigations required to be addressed in planning application.
These proposed [strategic] sites are within the Beaumont Leys Ward, which has been identified as one of the most deprived areas in Leicester. By increasing the households in Beaumont Leys because of the new housing plans, there will be a negative impact on existing residents, as there will inevitably be increased pressures on health services, education, and employment.	Local Residents: 135, 229, 231, 232	The Council have explored alternative sites to address housing needs, this is outlined in the site selection methodology (EB/HO/5). Negative impacts on services are expected to be addressed at planning application stage.
The city council are adamant that new housing must be developed on greenfield sites, which are all located in the West and Northwest of Leicester city. Due to loss of green space, this will have an adverse effect on the mental health and wellbeing of residents.	Local Residents: 135, 229, 231, 232	The Local Plan prioritises new housing development on brownfield sites in the Central Development Area, which is planned to accommodate 6,286 dwellings, which is c. 30% of

		the city's planned housing provision, over the course of the Local Plan period (Table 1, pp.49-50 of Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
The council needs to explore alternative sites in Leicester to address the housing need, including reviewing sites empty business space and brownfield land as potential housing development. There are two strategic sites the council have failed to consider, which may be more appropriate and suitable for housing development. These are Severn Trent Water land and offices, and Leicestershire County Council offices and land (the County Council are reviewing the purpose and use of this building going forward)	Local Residents: 229, 231, 232	The representors have suggested two sites for allocation which are outside the city's administrative boundaries. The City Council cannot allocate sites outside its boundaries. The Local Plan prioritises new housing development on brownfield sites in the Central Development Area, which is planned to accommodate 6,286 dwellings, which is c. 30% of the city's planned housing provision, over the course of the Local Plan period (Table 1, pp.49-50 of Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
The council needs to explore alternative sites in Leicester to address the housing need, including unlocking housing potential in student accommodation, that is now surplus to requirement because of Covid-19	Local Residents: 229, 231, 232	<ul> <li>The Council has explored alternative sites to address housing needs, this is outlined in the site selection methodology (EB/HO/5).</li> <li>The assessed local housing need (Documents EB/HO/1 Local Housing Needs Assessment (2022) and EB/HO/1a Local Housing Needs Assessment: Update Addendum (2022)) takes into account meeting the needs of the community including student homes.</li> </ul>
The council needs to explore alternative sites in Leicester to address the housing need, including unlocking housing potential in empty homes	Local Residents: 229, 231, 232	Empty homes have been considered in the calculation of overall housing need. This has been explained in the Local Housing Needs Evidence February 2022 update.

The council needs to explore alternative sites in Leicester to address the housing need, including extending existing council houses (relaxing of planning permissions means this may be easier), to create larger family homes	Local Residents: 229, 231, 232	Any future supply and development will need to comply with housing mix and type as specified in the housing mix policy (HoO3) or any future evidence update.
The council needs to explore alternative sites in Leicester to address the housing need, including reviewing and reducing lease terms on occupied council homes. Council home should not be for life, if your financial circumstances improve and you can afford to buy or rent privately, and the same principle, should apply for council house ownership. This ensures fair distribution of resources to those who need it	Local Residents: 229, 231, 232	This is outside of the remit of the Local Plan.
The plans will cause catastrophic pollution and destruction of ancient woodland neolithic structures and damage the habitats of several protected species for ever. The dark skies in the north are amongst the only areas where animals can seek nocturnal shelter and behave normally, including badgers, newts, bats, owls, kites, as well as biologically important species of trees and plants. The transport, flooding, and congestion make these proposals, including the school completely unworkable and catastrophic for the environment.	Local Residents: 143	Pollution, tree and wildlife impacts have been analysed as part of the site assessment process. Adverse impacts to these existing aspects are expected to be mitigated through planning application process. Site master planning is expected to reduce the overall impacts of these features.
A school and homes on Ashton Green East will flood. The plans will cause catastrophic flooding. We are already frequently inundated when it rains after the approval of homes in Anstey particularly and the small development on Mill Lane which means the Rothley Brook, which takes much of the water away from the city, bursts its banks at least 4 times a year NOW. There are photos of people riding horses through the water with only the riders' upper body visible, the water is already that deep.	Local Residents: 143	Flooding constraints have been assessed and a Flood Risk Assessment with appropriate mitigations would be required as part of planning applications.
A school and homes on Ashton Green East will destroy the green wedge and its incumbent wildlife and geological heritage, destroy the character of a protected hamlet, and mean there is no separation between Thurcaston in virtually any direction.	Local Residents: 143	Where green wedges have been de-designated in total or in part, these have been in locations which are deemed the most sustainable and where the benefits to the city through allocation of the land outweighs the benefits of retaining the land as undeveloped green wedge. Reasons for revising green wedge boundaries can be

		viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023)
The plans will cause catastrophic congestion. Leicester Road into the city is already regularly used by commuters avoiding the A6 as an alternative route between the M1 north or Loughborough and schools between Leicester and the north. Lorries regularly use the route and the police do not enforce weight restriction rules now. Criminals regularly commit thefts and robbery, heading in and out of Leicester with impunity. We already suffer with almost unbearable levels of noise from development in the city, illegal lorries on our road and the constant 24-hour traffic noise.	Local Residents: 143	Existing issues on the site are outside of the remit of the Local Plan. However, any new development would be expected to be of high-quality design an in compliance with transportation (Chapter 16) and design (Chapter 8) policies.
There is no public transport here or in Ashton Green. Even for children to get to schools, indeed we had to dig our own path so they could walk to their school without being mown down in the dark by motorists between Anstey and Thurcaston. Teenagers find it virtually impossible to get to sixth form colleges or to socialise.		
Our children already struggle to get to school because of a lack of transport and the plans will be dangerous to pedestrians and have safeguarding issues for children and the wider public and will result surely in traffic fatalities.		
Walking from the A6 Greengate Lane in the night has led to at least one young woman suffering an attempted abduction. I have had two vehicles stolen and a burglary and most of my neighbours have too.		
We do not need more gypsy and traveller sites	Local Residents: 143	The city's need for Gypsy and Traveller pitches was identified in the 2016 Gypsy & Traveller Accommodation Assessment (EB/HO/2). However, this site is not allocated for Gypsy & Traveller provision.
The location of the school was previously approved, clearly outlined in the Councils plans, advertised on various media channels and I feel that this was falsely advertised by the council to generate funds/investment from central government. I think it is illegal that the pre-approved advertised plans have	Local Resident: 149	The planning application will determine the overall layout of the school. House prices are outside the remit of the planning system. Impacts

now changed. People are happy to live near a school but not directly opposite one, this will impact any potential resale value of my house. If the school is built opposite my house, the council should compensate for loss of value to my home and contribute towards cleaning the front of my home and cars for the construction mess/pollution that will happen once construction begins.		to views and privacy will be assessed in accordance with design policies (Chapter 8).
If the school is built opposite my house, I would lose the magnificent views from my property overlooking the fields/towards the A46, which were a key part of our decision to purchase this beautiful home. I am not against building a secondary school but am concerned to find that the school will possibly be built opposite my home. I am strongly objecting as this has an impact on my privacy. There will be increased pedestrian footfall, primarily secondary school children, walking past my front drive.		
I am concerned about the possibility anti-social behaviour and littering. What will the council do about policing this when resources are already short within the council and local police?	Local Resident: 149	This is outside the remit of the Local Plan.
The chaos of having both a primary school (existing Glebelands Primary) and secondary school on one side of Greengate Lane/Ashton Green Road is unimaginable.	Local Resident: 149	Impacts of the new school will be assessed at planning application stage and would need to consider DQP06 'Residential amenity'.
I am concerned about the usage of the school and grounds on evenings and weekends. Should the grounds be hired out for functions such as weddings or parties, this will mean additional noise. What will the impact on the local roads be? Will the field floodlights be on until late in the evenings? This will add to light pollution in the area	Local Resident: 149	The Council would expect that Travel Plans are submitted with a planning application to assess the impacts of issues such as this and provide mitigations.
The proposal looks like it will back onto the current travellers' site on Greengate Lane and existing homes on Greengate Lane itself. This will cause severe disruption to the current residents on Greengate Lane who have lived there peacefully for several years now. What will happen to them, will the council be looking to relocate them as part of these plans? If so, where would they be moved?	Local Resident: 149	This is outside the remit of the Local Plan. Impacts of construction should be mitigated.

Ashton Green Road already has had an impact on my mental health and wellbeing due to the speeding cars, loud noise generated by vehicles going over the ramps, and HGVs driving past. I am not able to sleep properly during the night (loud noises from HGV speeding over the ramps), the early hours of the morning or even enjoy a weekend snooze due to the noise and fear that at some point one of these vehicles is going to plough through my living room wall whilst myself and family are all in bed or worse sitting in the living room when it happens. The volume of traffic also concerns me as a parent, I do not feel comfortable taking my children for a walk on Ashton Green Road due to the speeds and those cars that decide to drive on the footpath!	Local Resident: 149	Impacts to traffic as part of the development would need to be addressed in planning application.
This site contravenes: • National Planning Policy Framework (NPPF) - Paragraphs 72,103, 109, 122, 127 128 Pages - P110, P125, P127, P129, P171 • Leicester Core Policy 3 and 14 • Building for life section 2 • National Design Guide Paragraph 40 and 42	Local Resident: 149	The Council considers the Plan and Site Allocations to be in line with the NPPF.
Birstall Parish Council / Charnwood Borough Council asked to meet with Leicester City Council regarding the proposed Ashton Green East (Site 262). Leicester City Council declined, stating it's not productive to meet up. Surely this development has larger scale impact than just within the Leicester City boundary.	Local Resident: 149	The Council have consulted neighbours as part of each consultation and continue to engage with Charnwood Borough Council through Duty to Cooperate meetings. An agreed Statement of Common Ground is available (SCG/5). An in- person meeting was held with representatives of Birstall Parish Council during the Regulation 19 consultation.
Leicester City Council (LCC) have totally failed to objectively assess the impacts and needs of the neighbouring authorities of Charnwood Borough Council and Birstall Parish Council, even though LCC have referred to the requirement to do this in paragraph 18.4 etc	Local Residents: 165	The Council believes that the Local Plan has met the requirements of the NPPF and its Objectively Assessed Need, which is evidenced in our Statements of Common Ground (SCG/1 and SCG/5)
LCC recognise the need to make "Alterations to the A6 Loughborough Road / Sibson Road signal-controlled junction". I have lived in Birstall for over 30yrs, and I have seen many changes to the layout of this junction. None of the improvements have alleviated the increased flow of vehicles, and the accumulating queues twice per day. Any Highways Engineer would have an	Local Residents: 165	This is a matter to be decided at planning application stage. Changes to the signals and layout are outside of the remit of the Local Plan.

<ul><li>impossible challenge to alter this junction to allow for the significant increases in the flow of traffic as a result of this development.</li><li>A further full assessment of the traffic implications should be completed for Greengate Lane, and the Sibson Road / A6 junction.</li></ul>		
Greengate Lane is already busy at the best of times, it has an old railway bridge with a weight restriction and a significant bend on each approach, the local cemetery, a primary school, a large medical practice that is due to expand 50%, and three junctions into the Gates Estate. It is also on a steep hill, further increasing the hazards on this small road.	Local Residents: 165	This is a matter to be decided at planning application stage.
Consideration should be given to the complete replacement of the railway bridge on Greengate Lane, and the inclusion of traffic calming measures.		
Consideration should be given to the permanent closure of Greengate Lane to all vehicular traffic, either at the boundary with LCC, or at the railway bridge.		
LCC have failed in their duty to "constructively, actively or on an ongoing basis engage with a neighbouring authority." LCC have not co-operated with Birstall Parish Council (BPC) with regard to this aspect of their Local Plan. Instead LCC have been dismissive to the approaches from BPC and have not adequately communicated this part of the Local Plan to those who will be significantly impacted by this development, namely Greengate Lane and the Gates Estate.	Local Residents: 165	The Council have consulted neighbours as part of each consultation stage and conducted a meeting with representatives of Birstall Parish Council during Regulation 19 consultation. There is no obligation under Duty to Cooperate to meet with Parish Councils outside of the administrative boundary, DtC meetings have been held with Charnwood Borough Council.
No number of calming measures will alter the fact that Greengate Lane provides and will continue to provide the quickest and easiest access to the A6 / A46 / M1 from Ashton Green. The Lane already has a constant stream of traffic, including HGVs. Increased traffic will inevitably mean that the bridge over the heritage Great Central Railway will need to be closed for repair at some point, leaving only a single road into and out of the Gates estate, clearly a safety risk. The fact that responsibility for maintaining the bridge lies with the Great Central Railway creates an additional problem. The use of traffic lights to create a one-way system over the bridge would lead to long queues	Local Residents: 223	This is a matter to be decided at planning application stage.

<ul><li>on both sides of the bridge, blocking entry to and egress from Woodgate Drive and Highcliffe Primary School.</li><li>An access road to the A46 should be constructed adjacent to the Ashton Green development</li></ul>		
Birstall Parish Council invited the Leicester City Mayor, Mr Soulsby, and Leicestershire County Council Highways Department to a public meeting to enable residents to voice their concerns to them regarding the impact of additional traffic using Greengate Lane from the Ashton Green Development. Both authorities declined the invitation.	Local Residents: 223	The Council have consulted neighbours as part of each consultation stage and conducted a meeting with representatives of Birstall Parish Council during Regulation 19 consultation. There is no obligation under Duty to Cooperate to meet with Parish Councils outside of the administrative boundary, DtC meetings have been held with Charnwood Borough Council.
It is my view that development would lead to the loss of an important area of Green Wedge resulting in coalescence between Leicester and Birstall The site is currently allocated as green wedge in the extant Development Plan. In the Green Wedge Review (2017), site 262 (together with an area to the north of the A46) is referred to as Area A, forming part of 'Thurcaston Road' green wedge'. The assessment of Area A concluded that its function in preventing the merging of settlements was STRONG and concluded that: "Area A does prevent the merging of settlements (Leicester and Birstall). This area of separation will become more important when Hallam Fields and Ashton Green are built. It also prevents the merging of Thurcaston to the north with development at Ashton Green." On guiding development form, it said: "Area A has strong defensible boundaries on three sides (the A46, the Great Central Railway line and Greengate Lane). The boundary between A and B is weaker." The City Council's Green Wedge Review Addendum Report (2020) upheld the findings in 2017. However, whilst the Great Central Railway provides a physical boundary between the City and Birstall, the topography of Area A is such that the railway, which runs in cutting at this location, is not that obvious. It cannot therefore be argued that it would provide a sufficient barrier to prevent the merging of settlements.	Local Residents: 224	Where green wedges have been de-designated in total or in part, these have been in locations which are deemed the most sustainable and where the benefits to the city through allocation of the land outweighs the benefits of retaining the land as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).

Charnwood undertook their own cross boundary review of Green Wedge in 2011 with a further review in 2016. The original study concluded that the role and function of the green wedge in this location would be adversely affected by built development and although there is a degree of intervisibility between the settlements in the green wedge, it does serve to prevent the merging of [Anstey, Thurcaston and] Birstall with Leicester. It concluded the green wedge guides development form. The 2016 review upheld the conclusion of the original assessment and concluded that the green wedge fulfils all four purposes and performs moderately with respect to preventing merging between settlements and guiding development form. As part of their new Local Plan preparation, Charnwood published a discussion paper 'Towards a Local Plan for Charnwood.' Arup was commissioned by Charnwood to prepare a report to review and respond to representations received in response to consultation on their 2016 Report with the aim of assisting their consideration of making or amending designations in the emerging Local Plan. The findings of this review concluded that the proposed designation boundaries were deemed to have been appropriate. The only amendments to the GW1 were to rectify small drafting errors to some of the boundaries of the green wedge.		
Development would result in an unacceptable impact on the existing highway network as a result of the increase in traffic generated from the proposed allocation site.	Local Residents: 224	Impacts to the existing highway network will be determined at planning application stage and informed by site master planning process.
I can't see what further assessments have been carried out to identify any further highway mitigation of the traffic impact from 670 dwellings on site 262a, the secondary school on site 262b, the additional 4.86 Ha of employment land on site 579 together with any potential additional traffic from the 420 dwellings on the other strategic allocation in Policy SL04 North of the A46 By-pass.	Local Residents: 224	To be compliant with the transportation chapter (Chapter 16) in the Local Plan, planning applications would be expected to include a Transport Assessment which adequately addresses these issues.
The original Transport Assessment [for the outline planning permission for Ashton Green] stated it was likely that there would be an increase in traffic movements around Cropston and Rothley but concluded that there would be no significant impact in terms of queuing and congestion. This needs to be revisited.		

Previous assessments have required solutions to be found to Greengate Lane's limitations (gradient, school, bends, and the weak bridge); without these the view has been that development should not proceed. Traffic from the Beaumont Leys area currently rat runs along Greengate Lane to avoid Redhill and the congestion on the single carriageway section of the A6 through Birstall. The weight limit on Greengate Lane is routinely breached by HGVs avoiding Redhill when travelling from the A6/A46. Any further development on this site will add to these problems.		
It is clear that SL03 doesn't perform well in the sustainability assessment. The site achieves positive scores on housing, employment and the proposed secondary school but gets a double negative/red for transport perhaps because it will cause increased car use. Included in 'Possible changes to the draft policy/mitigation' to offset dependency on the car is a note that "The site is adjacent to the railway line and has potential for a train station" really! On a privately owned leisure service?	Local Residents: 224	Issues such as a proposed train station will be provided at planning application stage. Appropriate mitigations will be required.
The Ashton Green masterplan emphasises sustainable transport; most of the off-site highway mitigation measures were based on a modal shift. However, policies SL02 to SL06 do not define how sustainable transport provision is proposed to be delivered.	Local Residents: 224	This will be decided at planning application stage and will be expected to be in compliance with T01 'Sustainable Transport Network'.
Despite over 300 dwellings now being occupied on the Glebelands Estate and the completed first phases of Ashton Green, there is presently no bus service to serve the site.		
Greengate Lane is under strain from more traffic as Ashton Green nears its 3,500-dwelling total. There is no access from Thurcaston onto the A46 so vehicles travelling north from there, as well as some travelling south, use Greengate Lane. The existing primary school on Greengate Lane generates traffic. Few motorists abide by the 20mph limit. The resulting traffic from the planned secondary school would exacerbate existing traffic problems.	Local Resident: 352	Impacts to the existing highway network will be determined at planning application stage and informed by site master planning process. This will be expected to be compliant with transportation policy (Chapter 16).
I have major concerns about the additional traffic generation on to Greengate Lane Birstall in terms of road safety on a road that has a number of safety issues. It is questionable on whether or not the bridge can cope with additional traffic.	158 (Leicestershire County Councillor	Impacts to the existing highway network will be determined at planning application stage and informed by site master planning process. This

	for Birstall, Cllr Daniel Grimley)	will be expected to be compliant with transportation policy (Chapter 16).
SL03 not marked on policies map	Local Resident:68	Site is shown on policies map.
Concerns over consultation process – no information received and breaches requirements of Equality Act 2010. Parish Council objections ignored/not correctly consulted on.	Local Residents: 114, 143, 149, 165, 223 Other: 158 (Leicestershire County Councillor for Birstall, Cllr Daniel Grimley) 338 (Birstall Parish Council)	Consultation carried out in line with Council's adopted Statement of Community Involvement (Submission Document SD/11 and SD/11a); Equalities Impact Assessment undertaken.
Queries where is a traffic risk assessment associated with the allocation of a school on the site. Also queries where is the transport policy associated with a school.	Local Resident: 143	School provision is to meet current and future need as set out in Document EB/DI/2 Infrastructure Assessment (Updated) (Excluding Transportation) – Final Draft (January 2023). Through the assessment of these sites, the Council have considered the transport issues to ensure that this is a deliverable site.
Site performs poorly in SA	Local Residents: 135, 224, 231, 232, 342	Considered as part of site assessments and mitigations.
Detailed information that would allow further assessment and understanding regarding the delivery of housing proposed at the allocated Strategic Sites has not been included within the Local Plan evidence base. Without further information and detailed breakdowns evidencing the proposed figures and schemes of the allocated strategic sites, proper scrutiny of the proposed housing delivery for these sites cannot take place. Further information	Statutory Consultee: 162 (Blaby District Council)	Site specific detail to be shared as part of the examination.

regarding these sites would assist proper analysis and scrutiny regarding delivery at these sites.		
Natural England considers that it is essential that the policy wording should be strengthened with respect to the provision of Green Infrastructure. It should set out requirements for the protection and creation of connected Green Infrastructure throughout the site for the benefit of nature and people. Opportunities should be taken to connect to the surrounding wider Green Infrastructure network. The long-term maintenance and management of these areas should also be agreed with the developer at the early stages of the planning process.	Statutory Consultee: 259 (Natural England)	Ongoing dialogue with Natural England. Local Plan (Document SD/2 Leicester Local Plan 2020- 2036 Submission (Regulation 19 publication) Plan (January 2023)) Policy SL03. Land to the east of Ashton Green requires provision for green infrastructure on the site. Per para. 4.28, a masterplan for this site will be required and must include provision of green infrastructure. The masterplan for development of the site will be assessed against the criteria of Policy NE03. Green and Blue Infrastructure.
Policy SL03 Land East of Ashton Green is a larger housing development but there is no mention of the primary school infrastructure required. The policy specifically refers to a new secondary school with a capacity of about 1,200 students. The size of the new secondary school would suggest two 630 place primary schools being required but there is no reference to this.	Statutory Consultee: 267 (Leicestershire County Council)	Ongoing dialogue with County Council. The amount of school provision required for growth under the local plan has been assessed and is set out in Chapter 6 of Document EB/DI/1a Infrastructure Assessment with Infrastructure Delivery Schedule (2022) and in Document EB/DI/2 Infrastructure Assessment (Updated) (Excluding Transportation) – Final Draft (January 2023). The schools planned for in the local plan will meet current and forecast future need as informed by the evidence.
Supporting text for the proposed strategic sites should be widened to refer to the cumulative and cross-boundary transport impacts of these sites on the north-western part of the Leicester Urban Area (both within the city and adjoining areas such as Charnwood District, and including impacts on the Strategic Road Network – i.e. A46).	Statutory Consultee: 267 (Leicestershire County Council)	Ongoing discussions with the County Council regarding cumulative and cross-boundary transport impacts of the strategic sites.
<ul> <li>Policy wording should be amended as follows:</li> <li>To require the impacts of this site to be considered cumulatively with other strategic sites in the northwest quadrant of the city so that a consistent and</li> </ul>	Statutory Consultee: 267 (Leicestershire County Council)	Ongoing discussions with the County Council regarding cumulative and cross-boundary transport impacts of the strategic sites.

<ul> <li>coordinated approach is taken to dealing with cumulative and cross-boundary transport and education impacts; and</li> <li>To include reference to other highway authorities, i.e., Leicestershire County Council and National Highways in the light of this site's likely impacts on highways for which they are the responsible authority.</li> <li>We do not believe that Policy SL03 meets the tests of soundness:</li> </ul>	Other: 279 (CPRE	Proportionate detail included in the strategic
<ul> <li>• Positively prepared – as presented the proposed development is not consistent with achieving sustainable development.</li> <li>• Justified – minimal information about the approach to developing this site is provided.</li> <li>• Effective – by not linking it together with two close neighbouring developments it fails to plan development effectively.</li> <li>We do not offer any specific alternative wording as, in our view, the policy should be withdrawn.</li> </ul>	Leicestershire)	policy, design and layout detail to be considered as part of master planning at planning application stage.
The removal of the green wedge designation and the proposed development, Policy SL03 Land East of Ashton Green, will destroy its function as a 'green lung'. This development, together with that proposed in Policy SL04 and Ashton Green, will contribute to a significant loss of countryside and change in the green character of the wider area.	Other: 279 (CPRE Leicestershire)	Where green wedges have been de-designated in total or in part, these have been in locations which are deemed the most sustainable and where the benefits to the city through allocation of the land outweighs the benefits of retaining the land as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
Despite their geographical closeness, each site is being treated as a distinct separate development in what appears to be a piecemeal approach to planning. The requirement in the policies for separate master plans for the delivery and phasing of this site may be appropriate, but they need to be linked to a wider Master Plan or an overall strategy for development for this new wider community.	Other: 279 (CPRE Leicestershire)	The site assessment has included input from professional specialisms within and outside the Council. Each site has been assessed for its role in suitability for allocation alongside other nearby allocations and emerging developments. Masterplans are expected to consider nearby developments and emerging allocations.
In CPRE Leicestershire's view, there is a lack of vision about the opportunities for developing a coherent and sustainable new community. This demonstrates		

<ul><li>a failure to pursue a positive, effective, and integrated approach to planning the future of this part of the City.</li><li>The supporting text refers to some requirements to be covered by a Master Plan. In our view some of these, together with other requirements, should be included in the policy.</li></ul>		A sustainable new community would be considered at master planning, in compliance with design policies (Chapter 8). The Council feels that the requirements mentioned in the policy are sufficient.
Lack of information and suggestions in the Sustainability Appraisal of a negative sustainability impact of this site is concerning and evidence of a lack of soundness.	Other: 279 (CPRE Leicestershire)	Negative impacts of the Sustainability Appraisal have been factored into site assessments and informed suggested mitigations for the site in the Strategic site allocations document (SD/18).
Where a range of different services can be accessed is an important consideration for sustainability. Clarity is required on how and where residents of these new developments are expected to access them. Location is important in reducing the need to travel and potentially in reducing emissions. It is unclear how residents will be able to use public transport and active travel rather than car travel options to access Beaumont Leys Town Centre and the new local centre to be provided in Ashton Green.	Other: 279 (CPRE Leicestershire)	Master planning of the site will be expected to provide this level of detail which is expected at planning application stage.
Without good long-term public transport and active travel links to the wider network and between the different areas of this emerging new community, travel is likely to be car dependent and unsustainable. Currently there are no proposed public transport improvements which would address this issue. Nor is there any specific reference or proposals in relation to SL03 as to how this issue could be successfully addressed. SL03 appears to conflict with Policy T01 which says "Development will be supported in suitable locations, where it promotes sustainable transport" by meeting various criteria set out in T01 and statements in paragraphs 6.13 and 6.20.	Other: 279 (CPRE Leicestershire)	Planning applications expected to be in compliance with transportation policies (Chapter 16). Proposed mitigations for transport issues would need to be adequately addressed through a Transport Assessment at planning application stage.
Given its location on the edge of the countryside and the loss involved, it is crucial that measures to mitigate harm to nature and secure Biodiversity Gain occurs on site. This can be done by the way nature considerations are designed into the site through maximising green infrastructure, provision of nature corridors or the planting and restoration of hedgerows. Paragraph 15.10 sets out some principles for achieving biodiversity gain which we support and should shape both a revised Policy SL03 and the Masterplan for the site. However, biodiversity gain offsets away from this site will not	Other: 279 (CPRE Leicestershire)	The Council would expect that planning applications would addresses these issues through policies NE01 'Protecting designated sites, legally protected and priority species, and priority habitats', NE02 'Biodiversity Gain' and NE03 'Green and Blue Infrastructure'

contribute to the development being sustainable and so, in our view, is not the way forward in this case. Links to the countryside that provide easy access can be important to creating a sustainable development and is important in this case given the loss of	Other: 279 (CPRE Leicestershire)	This will be expected in planning application stage in order to achieve positive design, in accordance
countryside and green wedge		with design policies (Chapter 8).
We are surprised that given the City Council's commitment to tackling the Climate Emergency and to achieving net zero by 2030, there are no policy requirements regarding renewable energy provision for this site.	Other: 279 (CPRE Leicestershire)	At planning application stage, proposals for development of the site will be assessed against Policies CCFR01. Sustainable Design and Construction, CCFR02. Whole Life-Cycle Carbon Emissions, CCFR03. Energy Statement, and CCFR04. Low Carbon Heating and Cooling of the local plan (Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
We do not offer any specific alternative wording [for the policy] as, in our view, the policy should be withdrawn. We noted the lack of strategic detail, for example, about transport provision, in this policy. If it remains, we do not consider it gives adequate guidance to ensure the development is delivered sustainably or in line with other policies in this plan, such as Policy T01, DQP01, and CCFR01 or statements such 15.10 on Biodiversity Gain principles. To make Policy SL03 sound requires it to set requirements regarding sustainable transport, design, access to town and local centres, biodiversity on the site, links to green spaces and countryside and energy and climate change as well as to housing and development requirements.	Other: 279 (CPRE Leicestershire)	The Council believes that the policy is robust and proportionate as written and should be read alongside the whole Plan. Constraints such as access to local town centres, biodiversity impacts and access to green spaces are identified through the site assessment and listed on pages 7-10 of the strategic site allocations document (SD/18). These are expected to be appropriately mitigated at planning application stage alongside other policies in the plan pertaining to Biodiversity Gain, sustainable transport etc.
Infrastructure Assessment and Delivery Schedule identifies new schools needed, plan should identify where and how demand will be met.	Statutory Consultee: 337 (Department for Education)	Ongoing dialogue with Department for Education. Document EB/DI/2 Infrastructure Assessment (Updated) (Excluding Transportation) – Final Draft (January 2023) updates the earlier Infrastructure Assessment and Delivery Schedule (Document EB/DI/1a Infrastructure Assessment with Infrastructure Delivery Schedule (2022)). The

		schools planned for in the local plan are based on the most recent evidence.
We consider that the parcel proposed [for a secondary school] in the most recent iteration of the plan is now of a sufficient scale to accommodate the school buildings and supporting infrastructure (playing pitches and car parking, drop-off points) required. We support the proposed changes to this allocation since the Strategic Sites Proposed for Allocation were published in September 2022.	Statutory Consultee: 337 (Department for Education)	Support welcomed
There are green field sites for development including Ashton Green. We prefer building on brownfield sites but acknowledge there are not enough of them in the city. Brownfield sites should be used first, and only then consider green field sites, and ensure these are developed in collaboration with local communities. Where it is necessary to build on greenfield sites, we would expect developments to be high density, leaving 50% of the land free for green space and flood defences. We would expect developments to be zero carbon, climate resilient and as environmentally friendly as possible.	Other: 353 (Leicester Green Party)	The Local Plan prioritises new housing development on brownfield sites in the Central Development Area, which is planned to accommodate 6,286 dwellings, which is c. 30% of the city's planned housing provision, over the course of the Local Plan period (Table 1, pp.49-50 of Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)). At planning application stage, proposals for development of the site will be assessed against Policies CCFR01. Sustainable Design and Construction, CCFR02. Whole Life-Cycle Carbon Emissions, CCFR03. Energy Statement, and CCFR04. Low Carbon Heating and Cooling of the local plan (Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
We support the removal of the Green Wedge designation for the land covered by the proposed allocation at Ashton Green, as this would be the most suitable location for a new school to support the proposed housing allocation.	Statutory Consultee: 337 (Department for Education)	Support welcomed
Where the City Council is the landowner, it should use its land holdings positively to insist on zero carbon for all housing developments. This addition will make the Local Plan sound by taking a proactive approach to mitigating	Other: 355 (Climate Action Leicester and	At planning application stage, proposals for development of the site will be assessed against Policies CCFR01. Sustainable Design and

and adapting to climate change and ensuring the future resilience of communities and infrastructure.	Leicestershire & Friends of the Earth)	Construction, CCFR02. Whole Life-Cycle Carbon Emissions, CCFR03. Energy Statement, and CCFR04. Low Carbon Heating and Cooling of the local plan (Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
The following modification is proposed: Changes to the policy wording to ensure that integration with the area of Green Wedge in Charnwood is considered and that CBC is consulted on the masterplan for the site in relation to this issue.	Statutory Consultee: 311 (Charnwood Borough Council)	Ongoing discussions with Charnwood Borough Council. Although the Local Plan (Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)) de-designates the policy site from the green wedge, per para. 4.28, master planning for the site is required to include green infrastructure, open spaces, sustainable drainage systems, and to be in keeping with the character of the surrounding area. Furthermore, due regard must be had to the surrounding green wedge, which includes green wedge in adjoining districts.
The commitment to master planning for the uses set out in the individual policies is welcomed. While housing delivery numbers are indicated in the policies, the City Council is encouraged to maximise the residential capacity of these sites through the master planning process. It may be that higher densities can be achieved on these important strategic sites. Expressing the capacity of these sites in policy as minimums would give some room for potentially higher densities should this prove possible.	Statutory Consultee: 282 (Harborough District Council)	Support welcomed for requirement for master planning on strategic sites. Capacities on sites are indicative which do not preclude a site coming forward for higher capacities and will be dealt with at planning application stage considering compliance with the whole plan policies.

## Policy SL04: Site 261 – Land to the north of A46

Comments from: 11, 68, 72, 115, 135, 139, 143, 149, 162 (Blaby District Council), 229, 231, 232, 248, 259 (Natural England), 267 (Leicestershire County Council), 279 (CPRE Leicestershire), 282 (Harborough District Council), 283, 286, 300 (Historic England), 311 (Charnwood Borough Council), 330, 353, 502, 505

Main Issues Raised	Rep ID (name of Statutory Consultee or organisation where applicable)	Council's response
Whilst I agree with the locations, I do feel that this would potentially add an extra 2000+ cars to the local road network.	Local Residents: 11	Details of any proposed development on the site will be assessed against Policy T01. Sustainable Transport Network (SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)) at application stage.
I would ask that you consider adding a new junction to the A46 to join Thurcaston directly to the A46 thereby alleviating all current and additional traffic problems.	Local Residents: 11	The Council has an extensive list of required infrastructure at the back of the plan (Appendix 4 of SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)) and the Council is satisfied that this is adequate to support the plan at this stage. A more specific infrastructure policy will be considered through the modification process.
The speed bumps on Ashton Green Rd need removing, the road widening and a 30mph speed camera installing.	Local Residents: 11	These issues are beyond the remit of the Local Plan.
Traffic slowing to 10mph to travel over the speed bumps does not aid traffic flow with a potential 2000 extra cars passing along twice daily.	Local Residents: 11	Road speed limits are beyond the remit of the Local Plan.
Local Plan Para 14.8 – Providing a 'green lung' into urban areas (including a continuous link between open countryside and land which penetrates into urban areas) This is essential for bees and other pollinating insects which are in decline, and this threatens our food security. Preserving green spaces is	Local Residents: 72	Where green wedges have been de- designated in total or in part, these have been in locations which are deemed the most sustainable and where the benefits

<ul> <li>essential for the health of the country as a whole, as well as the local population.</li> <li>Providing a recreational resource (including publicly accessible informal and formal recreation facilities) See also para 14.6 "Green wedges have a strategic function and extend beyond the city's administrative boundary into the Leicester Urban Area."</li> <li>Local Plan Para 14.1 "There are several background studies that will underpin policies in this plan. The main technical studies for this chapter are published on our website and will be updated as and when new studies are undertaken and completed." Green Wedge Review Joint Methodology (2011) Green Wedge Review (2017) and Addendum Report (2020)" – these two reports are highly supportive of the green wedge and therefore do not underpin policies in the Plan relating to deletion of green wedges.</li> <li>All the strategic sites, SL02 to SL06, are on current Green Wedge.</li> <li>Proposed development on Green Wedges will have a negative impact on the City's open space network. See para 2.31 "2.31 Leicester's open space network consists of a variety of spaces of differing size, quality and function, comprising almost 25% of the city area. Approximately half of the open space network is in the green wedges, which were allocated in 2006."</li> </ul>		to the city through allocation of the land outweighs the benefits of retaining the land as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023). Details of any proposed development on the site will be assessed against the open space provisions within Policy SL04, and Policy OSSR03. Open Space in New Development at application stage.
Local Plan Paragraph 14.8 • To prevent the merging of settlements (considering both physical separation and the perception of distance between settlements) • Guiding development form • Providing a 'green lung' into urban areas (including a continuous link between open countryside and land which penetrates into urban areas) • Providing a recreational resource (including publicly accessible informal and formal recreation facilities) See also paragraph 14.6 "Green wedges have a strategic function and extend beyond the city's administrative boundary into the Leicester Urban Area."	Local Residents: 115	Where green wedges have been de- designated in total or in part, these have been in locations which are deemed the most sustainable and where the benefits to the city through allocation of the land outweighs the benefits of retaining the land as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).

Para 14.7 states with regards to Green Wedges: "This gives them a strategic importance as they connect the city to the surrounding Leicestershire countryside."		
Local Plan OSSR01 "Development in green wedges will be permitted where: a) it does not adversely affect the predominantly open and undeveloped character of the green wedge."		
The council plans for all the strategic sites will clearly adversely affect the predominantly open and undeveloped character.		
All of the strategic sites selected by council officers have a sustainability appraisal of red and amber. Despite the ratings, and opposition/feedback from residents, the city council are still putting these sites forward as the final list of sites that it wishes to be included in the Local Plan for submission for Examination in Public. A reoccurring factor highlighted in the sustainability appraisal for the strategic sites is the remoteness in terms of public transport, and the existing Green Wedge designation, which the council ignore by earmarking these sites for development.	Local Residents: 135, 229, 231, 232	The Council believes that the overall strategic need outweighs any negative scoring in the Sustainability Appraisal. Issues such as access to public transport and green wedge designation were considered as part of site assessments and mitigations required to be addressed in planning application.
These proposed [strategic] sites are within the Beaumont Leys Ward, which has been identified as one of the most deprived areas in Leicester. By increasing the households in Beaumont Leys as a result of the new housing plans, there will be a negative impact on existing residents, as there will inevitably be increased pressures on health services, education and employment.	Local Residents: 135, 229, 231, 232	The Council has explored alternative sites to address housing needs, this is outlined in the site selection methodology (Document EB/HO/5). Negative impacts on services are expected to be addressed at planning application stage.
The city council are adamant that new housing must be developed on greenfield sites, which are all located in the West and Northwest of Leicester city. Due to loss of green space, this will have an adverse effect on the mental health and wellbeing of residents.	Local Residents: 135, 229, 231, 232	The Local Plan prioritises new housing development on brownfield sites in the Central Development Area, which is planned to accommodate 6,286 dwellings, which is c. 30% of the city's planned housing provision, over the course of the Local Plan period (Table 1, pp.49-50 of Document SD/2 Leicester Local Plan 2020-

		2036 Submission (Regulation 19 publication) Plan (January 2023)).
The council needs to explore alternative sites in Leicester to address the housing need, including reviewing sites empty business space and brownfield land as potential housing development. There are two strategic sites the council have failed to consider, which may be more appropriate and suitable for housing development. These are Severn Trent Water land and offices, and Leicestershire County Council offices and land (the County Council are reviewing the purpose and use of this building going forward)	Local Residents: 229, 231, 232	<ul> <li>The representors have suggested two sites for allocation which are outside the city's administrative boundaries. The City Council cannot allocate sites outside its boundaries.</li> <li>The Local Plan prioritises new housing development on brownfield sites in the Central Development Area, which is planned to accommodate 6,286 dwellings, which is c. 30% of the city's planned housing provision, over the course of the Local Plan period (Table 1, pp.49-50 of Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).</li> </ul>
Alternatives to address the housing need should be explored, such as unlocking housing potential in student accommodation that is now surplus to requirement because of Covid-19	Local Residents: 229, 231, 232	The Council has explored alternative sites to address housing needs, this is outlined in the site selection methodology (EB/HO/5).The assessed local housing need (Documents EB/HO/1 Local Housing Needs Assessment (2022) and EB/HO/1a Local Housing Needs Assessment: Update Addendum (2022)) takes into account meeting the needs of the community including student homes.
Alternatives to address the housing need should be explored, such as unlocking housing potential in empty homes.	Local Residents: 229, 231, 232	Empty homes have been considered in the calculation of overall housing need. This

		has been explained in the Local Housing Needs Evidence February 2022 update.
Alternatives to address the housing need should be explored, such as extending existing council houses (relaxing of planning permissions means this may be easier) to create larger family homes	Local Residents: 229, 231, 232	Any future supply and development will need to comply with housing mix and type as specified in the housing mix policy (Ho03) or any future evidence update.
Alternatives to address the housing need should be explored, such as reviewing and reducing lease terms on occupied council homes. Council home should not be for life if your financial circumstances improve, and you can afford to buy or rent privately. The same principle should apply for council house ownership. This ensures fair distribution of resources to those who need it.	Local Residents: 229, 231, 232	This is outside of the remit of the Local Plan.
This site is in an unsuitable and unsustainable location	Local Resident: 139	It is the Council's view that the site is in a sustainable location and that the benefits to the city through allocation of the land outweighs the harms.
Development would lead to the loss of an important area of Green Wedge resulting in coalescence between Leicester and Thurcaston. The green wedge is large in area but is narrow in some places, particularly in the sections between Anstey and Beaumont Leys, between Thurcaston and Ashton Green, and between Birstall and Ashton Green. In the Green Wedge Review (2017), site 261 falls within Area E forming part of the Castle Hill green wedge. In fact, 261 is virtually all of that part of Area E to the north of the A46 bypass. The performance of Area E in preventing the merging of settlements was assessed as MODERATE in all four functions. With regards to the separation criteria, it concluded that: "Area E prevents the merging of Thurcaston to the north in Charnwood's administrative area, and Glebelands to the south" but it also went on to say that: "It will become more important when Ashton Green is developed."	Local Resident: 139	The site has been proposed for green wedge de-designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
The development of this site will result in the loss of this 'important' area of green wedge resulting in the coalescence of Thurcaston and Leicester.		

The Green Wedge Review Addendum Report (2020) dropped the reference to Ashton Green in relation to Area E and simplified the findings of the earlier assessment: "Overall, Area E performs moderate in all four green wedge functions". However, the Overall Qualitative Summary of the Castle Hill Green Wedge concludes that: "In conjunction with the adjoining green wedge in Charnwood, the Castle Hill Green Wedge contributes to preventing the merging of Beaumont Leys and Glebelands areas to the south (in Leicester's administrative boundary) and the Anstey, Thurcaston and Cropston settlements to the north and west, in Charnwood's administrative boundary. This green wedge will become more important when Ashton Green is developed"

Charnwood Borough Council undertook their own cross boundary review of Green Wedge in 2011 with a further review in 2016. The original study concluded that the role and function of the green wedge in this location would be adversely affected by built development and although there is a degree of intervisibility between the settlements in the green wedge, it does serve to prevent the merging of Anstey, Thurcaston and Birstall with Leicester. It concluded that the green wedge guides the development form. The review in 2016, entitled the 'Green Wedges, Urban Fringe Green Infrastructure Enhancement Zones and Areas of Local Separation Methodology and Assessment Findings Report' upheld the original assessment and concluded that the two green wedges in Charnwood, including that adjacent to the Castle Hill Green Wedge (GW1) continue to fulfil all four Green Wedge purposes and that both existing Green Wedges, as a whole, continue to perform moderately with respect to preventing of merging between settlements and guiding development form. Charnwood published a discussion paper 'Towards a Local Plan for Charnwood.' The opportunity was taken to consult on the evidence base that helped inform the discussion paper. Arup prepared an addendum report to review and to respond to the representations received in response to consultation on the Green Wedges and Areas of Local Separation Report. The findings of the Arup review concluded that the proposed designation boundaries were deemed to have been appropriate at the time of assessment in 2016. The only amendments to the GW1 were to rectify small drafting errors to some of the boundaries of the green wedge.

Development would result in an unacceptable impact on the existing highway	Local Resident:	Per para. 4.30 of the Local Plan, a
	139	
Development would result in an unacceptable impact on the existing highway network due to the increase in traffic generated from the proposed allocation site. Notwithstanding the description of Policy SL04 as a "northward extension of the urban extent of the City beyond the A46 (in conjunction with the consented Ashton Green development)", to all intents and purposes this is not an extension of the City of Leicester. The A46 Leicester Western By-Pass forms a boundary and separates SL04 from Ashton Green. SL04 is in Thurcaston. There is one pedestrian footbridge and one unwelcoming pedestrian underpass from site 261 into Ashton Green. However, none of the community facilities, retail, schools, or employment uses proposed on Ashton Green are within walking distance of these links. There is no realistic potential for the provision of vehicular access directly into the consented Ashton Green Development. Access to SL04 will therefore have to be taken from either Anstey Lane or Leicester Road. This is not by any stretch of the imagination 'an extension' of Ashton Green; it is a standalone development in an unsustainable location.	Local Resident: 139	<ul> <li>Per para. 4.30 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.</li> <li>The City Council's administrative boundaries are very tightly constrained to such extent that the city has grown beyond them in almost every direction. To meet Leicester's housing target, all potential areas for development must be considered. Further details about the proposed site allocations and the site selection process are in Part 2 of Document TP/5 Leicester Local Plan 2020 to 2036 Housing and Sites Topic Paper (2023).</li> <li>Details of any proposed development on the site will be assessed against Policy DQP01. Design Principles at application stage. Paragraphs 3.1.3 and 3.1.6. of the Statement of Common Ground on the Land North of A46 site (SCG/6 SoCG Land to the North of A46 (2023)) addresses</li> </ul>
		demand for schools and retail resulting from development of the site.

There are no retail units in Thurcaston (other than an electrical goods trader). Community facilities in Thurcaston comprise one public house, a small village hall and a primary school. There is no GP practice within walking distance (the nearest are at Anstey, Mountsorrel or Birstall).	Local Resident: 139	The Council is unable to provide comment on Thurcaston village, as this is outside of the city's administrative boundary. However, any new retail and GP practice proposals within the city would be assessed at planning application stage in accordance with policy.
There is presently one, approximately hourly, bus service through Thurcaston, the 154 Centre bus Service which runs each way between Loughborough and Leicester. The only 'work' bus into Leicester on a weekday leaves Thurcaston at 08.03 arriving 08.38. The next one doesn't leave until 09.36. The last bus back from Leicester is at 17.45. The first 'work' bus to Loughborough does leave earlier at 07.00 arriving 07.26. There is another at 07.55/07.56 (depending on whether it's a school day) arriving at 08.30/08.40. The last bus back is 18.46.	Local Resident: 139	This is outside of the scope of the Local Plan.
I can't see what further assessments have been carried out to identify any further highway mitigation of the traffic impact from 420 dwellings on site 261 and 670 dwellings on site 262a, the secondary school on site 262b, the additional 4.86 Ha of employment land on site 579.	Local Resident: 139	Per para. 4.30 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.
Site 261 is not a mixed-use development. The site isn't big enough to sustain retail, community and employment uses. It is purely housing, so it is inevitable that new trips will be generated from the site no matter how sustainable and self-contained it is purported to be. This will impact significantly on the surrounding highway network.	Local Resident: 139	Per para. 4.30 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development.

		Transport Impact Assessments will also be expected as part of any planning application for the site.
Previous assessments have required solutions to be found to Greengate Lane's limitations (gradient, school, bends, and the weak bridge); without these the view has been that development should not proceed. Traffic from the Beaumont Leys area currently rat runs along Greengate Lane to avoid Redhill and the congestion on the single carriageway section of the A6 through Birstall. The weight limit on Greengate Lane is routinely breached by HGVs avoiding Redhill when travelling from the A6/A46. Any further development on this site will add to these problems.	Local Residents: 139	Per para. 4.30 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.
The commentary in the Local Plan Sustainability Appraisal (SA) on the SA objective which scored red was that: "The site is on the edge of the city and adjacent to the Leicester Western Bypass and is likely to be car-dependent." The only SA scored positive impact (Green ++) of development was that it; "Would deliver 420 new homes, inc. 30% affordable" Therefore, the SA finds that Site 261 performs poorly. This is partly attributable to the site's existing Green Wedge designation and relative remoteness in public transport terms. Ashton Green's vision is firmly centred on sustainable development. The Ashton Green masterplan emphasises sustainable transport; most of the off-site highway mitigation measures were based on a modal shift. However, policies SL02 to SL06 do not define how sustainable transport provision is proposed to be delivered.	Local Residents: 139	Per para. 4.30 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.
Despite over 300 dwellings now being occupied on the Glebelands Estate and the completed first phases of Ashton Green, there is presently no bus service to serve the site.		
The plans will cause catastrophic pollution and destruction of ancient woodland neolithic structures and damage the habitats of several protected species for ever. The dark skies in the north are amongst the only areas where animals can seek nocturnal shelter and behave normally, including badgers, newts, bats,	Local Residents: 143	Details of any proposed development on strategic sites will be assessed against Policy T02. Climate Change and Air Quality, Policy OSSR03. Open Space in

owls, kites, as well as biologically important species of trees and plants. The transport, flooding, and congestion make these proposals, including the school completely unworkable and catastrophic for the environment.		<ul> <li>New Development, Policy DQP06.</li> <li>Landscape Design and Policy NE02.</li> <li>Biodiversity Gain at application stage.</li> <li>A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06.</li> <li>Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).</li> <li>Per para. 4.30 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.</li> </ul>
A school and homes on Ashton Green East will flood	Local Residents: 143	A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
A school and homes on Ashton Green East will destroy the green wedge and its incumbent wildlife and geological heritage, destroy the character of a protected	Local Residents: 143	The site has been proposed for green wedge de-designation as it is the Council's

hamlet, and mean there is no separation between Thurcaston in virtually any direction.		view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
The plans will cause catastrophic flooding. We are already frequently inundated when it rains after the approval of homes in Anstey particularly and the small development on Mill Lane which means the Rothley Brook, which takes much of the water away from the city, bursts its banks at least 4 times a year NOW. There are photos of people riding horses through the water with only the riders' upper body visible, the water is already that deep.	Local Residents: 143	A flood risk assessment will be undertaken on the site once a planning application is received in line with Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) (SD/2 – Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
The plans will cause catastrophic congestion. Leicester Road into the city is already regularly used by commuters avoiding the A6 as an alternative route between the M1 north or Loughborough and schools between Leicester and the north. Lorries regularly use the route and the police do not enforce weight restriction rules now. Criminals regularly commit thefts and robbery, heading in and out of Leicester with impunity. We already suffer with almost unbearable levels of noise from development in the city, illegal lorries on our road and the constant 24-hour traffic noise.	Local Residents: 143	Per para. 4.30 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.
There is no public transport here or in Ashton Green. Even for children to get to schools, indeed we had to dig our own path so they could walk to their school without being mown down in the dark by motorists between Anstey and Thurcaston. Teenagers find it virtually impossible to get to sixth form colleges or to socialise.	Local Residents: 143	Per para. 4.30 of the Local Plan, a masterplan will be required to develop this site. The masterplan will propose appropriate highways access for the site, and this will be assessed against Local Plan Policy T06. Highways Infrastructure, Policy

Our children already struggle to get to school because of a lack of transport and the plans will be dangerous to pedestrians and have safeguarding issues for children and the wider public and will result surely in traffic fatalities		T01. Sustainable Transport Network, and Policy T03. Accessibility and Development. Transport Impact Assessments will also be expected as part of any planning application for the site.
Walking from the A6 Greengate Lane in the night has led to at least one young woman suffering an attempted abduction. I have had two vehicles stolen and a burglary and most of my neighbours have too.	Local Resident: 143	This falls outside the remit of the Local Plan.
We do not need more gypsy and traveller sites	Local Resident: 143	The city's need for Gypsy and Traveller pitches was identified in the 2016 GTAA (EB/HO/2). The proposed allocation at Western Park Golf Course is for 7 Permanent Pitches to fulfil that identified need.
Leicester northwest and Beaumont Leys ward is overrepresented in the strategic and non-strategic sites for housing and business development. Beaumont Leys Ward has been identified as one of the most deprived areas in Leicester. This will have an unfair impact on neighbourhood resources (health, school, community services, transport) with more demand for these local services, cause increased pressures on health services, education and employment, and lead to significant loss of green space and greenfield wedges, which will have an adverse effect on the mental health and wellbeing of residents	Local Resident: 229	The Council have explored alternative sites proportionately across all areas of the city to address housing needs, this is outlined in the site selection methodology (EB/HO/5). Negative impacts on services are expected to be addressed at planning application stage.
Development of greenfield/wedge means the loss of habitation identity and a merged mess, with no boundary between city and county and neighbourhoods and wards.	Local Resident: 229	The site has been proposed for green wedge de-designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).

I believe brownfield sites will be ignored due to the higher cost of having to clear the land first for development. Therefore, the Council prefers for residents to be deprived of green space.	Local Resident: 229	The Local Plan prioritises new housing development on brownfield sites in the Central Development Area, which is planned to accommodate 6,286 dwellings, which is c. 30% of the city's planned housing provision, over the course of the Local Plan period (Table 1, pp.49-50 of Document SD/2 Leicester Local Plan 2020- 2036 Submission (Regulation 19 publication) Plan (January 2023)).
I am uneasy about Leicester City Council having its own housing development company, and its ability to push ahead with development with relaxed planning permission regulations. It is concerning that the council can sell council owned land cheaply to developers, relax planning permission for developers, and benefit from the profits/returns as a housing developer themselves. This gives the council huge leverage to steam roll communities and push ahead with development plans in addressing housing need targets	Local Resident: 229	The Local Plan and planning regulations apply to all planning applications regardless of the applicant.
I believe the Local Plan should be organic, and have built-in flexibility to easily amend proposals, based on current trends, and the impact of issues such as Covid-19, digitalisation, online retail, working from home, and climate changes. The Local plan needs to be reflective, and reactive to these changes.	Local Resident: 229	The Local Plan will be reviewed within 5 years once it is adopted.
A balanced approach is needed to ensure the interests of existing housing developments are not compromised to fulfil a housing need target. Full consideration must be given in respect of green space, air quality, climate change measures, health and well-being, impact on local schools, GPs, and community facilities.	Local Resident: 229	Details of any proposed development on strategic sites will be assessed against Policy T02. Climate Change and Air Quality, Policy OSSR03. Open Space in New Development, Policy DQP06. Landscape Design and Policy NE02. Biodiversity Gain at application stage.
The suitability site assessment does not consider environmental, social, health, and equality impact of taking green space away from residents and using it for housing developments.	Local Resident: 229	These matters are expected to be addressed as part of planning applications. The Local Plan does carry forward the existing standard of 2.88 ha of publicly accessible open space per 1,000

		population (para. 14.15 of Local Plan). The Council have assessed open space access based on this.
I am concerned the area has become over-developed. There have been a number or housing developments (Ashton Green, Bishopdale Road, City Heights, Glenfrith Farm) built in the and around Beaumont Leys over the last few years. Some developments are still on-going. Green space/belt/wedge is important for recreation, addressing climate change issues, keeping the identity of the area (prevent merging of areas), air quality and for nature and wildlife.	Local Resident: 229	The site has been proposed for green wedge de-designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
The construction of new houses so close to Bradgate Park will have significant impacts on the natural environment.	Local Resident: 248	Impacts to the natural environment will be expected to be addressed at planning application stage.
The site is currently home to a wide variety of wildlife and the construction process will disrupt and destroy their habitats.	Local Resident: 248	Details of any proposed development on the site will be assessed against Policy NE02. Biodiversity Gain
Increased traffic and pollution generated by the new development will have a negative impact on air and water quality. It will have an adverse effect on the lives of residents. Construction will negatively impact the quality of life of existing residents.	Local Resident: 248	These issues are expected to be addressed at planning application stage. Policy NE03 'Green and Blue Infrastructure' is most relevant to the improvements to water quality.
The fields are a picturesque backdrop to the village. The proposed allocation will significantly alter the village character and remove existing views of the fields from houses.	Local Resident: 248	The City Council's administrative boundaries are very tightly constrained to such extent that the city has grown beyond them in almost every direction. To meet Leicester's housing target, all potential areas for development must be considered. It is the Council's view that this site is in a sustainable location and

		the benefits to the city through allocation of the land outweighs the benefits of leaving it undeveloped. Further details about the proposed site allocations and the site selection process are in Part 2 of Document TP/5 Leicester Local Plan 2020 to 2036 Housing and Sites Topic Paper (2023).
The proposed allocation will devalue houses in the area. This will be a financial burden for current residents and will make it difficult for them to sell their houses in the future.	Local Resident: 248	This is not within the remit of the Local Plan.
The proposed allocation will strain already overburdened infrastructure, increasing demand on roads, schools, public services.	Local Resident: 248	This is expected to be addressed at planning application stage and consider the development and infrastructure policy DI01.
<ul> <li>CPRE Leicestershire objects to Policy SL04 and the associated paragraphs, namely 4.29 and 4.30. We do not believe that it meets the tests of soundness:</li> <li>Positively prepared – as presented the proposed development is not consistent with achieving sustainable development.</li> <li>Justified – minimal information about the approach to developing this site is provided.</li> <li>Effective – by not linking it together with two close neighbouring developments it fails to plan development effectively.</li> </ul>	Other: 279 (CPRE Leicestershire)	Proportionate detail included in the strategic policy, design and layout detail to be considered as part of master planning at planning application stage.
This development, together with that proposed in Policy SL03 and Ashton Green, will contribute to a significant loss of countryside and change in the green character of the wider area.	Other: 279 (CPRE Leicestershire)	The site has been proposed for green wedge de-designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document

		TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
Despite their geographical closeness, each site is being treated as a distinct separate development in what appears to be a piecemeal approach to planning.	Other: 279 (CPRE Leicestershire)	The site assessment has included input from professional specialisms within and outside the Council. Each site has been assessed for its role in suitability for
The requirement in the policies for separate master plans for the delivery and phasing of this site may be appropriate, but they need to be linked to a wider Master Plan or an overall strategy for development for this new wider		allocation alongside other nearby allocations and emerging developments.
community.		Masterplans are expected to consider nearby developments and emerging allocations.
In CPRE Leicestershire's view, there is a lack of vision about the opportunities for a developing a coherent and sustainable new community. This demonstrates a failure to pursue a positive, effective, and integrated approach to planning the future of this part of the City.		A sustainable new community would be considered at master planning, in compliance with design policies (Chapter 8).
The supporting text refers to some requirements to be covered by a Master Plan. In our view some of these, together with other requirements, should be included in the policy.		The Council feels that the requirements mentioned in the policy are sufficient.
Lack of information and suggestions in the Sustainability Appraisal of a negative sustainability impact of this site is concerning and evidence of a lack of soundness.	Other: 279 (CPRE Leicestershire)	Negative impacts of the Sustainability Appraisal have been factored into site assessments and informed suggested mitigations for the site in the Strategic site allocations document (SD/18).
Where a range of different services can be accessed is an important consideration for sustainability. Clarity is required on how and where residents of these new developments are expected to access them. Location is important in reducing the need to travel and potentially in reducing emissions.	Other: 279 (CPRE Leicestershire)	Master planning of the site will be expected to provide this level of detail which is expected at planning application stage.

It is unclear how residents will be able to use public transport and active travel rather than car travel options to access Beaumont Leys Town Centre and the new local centre to be provided in Ashton Green.		
Without good long-term public transport and active travel links to the wider network and between the different areas of this emerging new community, travel is likely to be car dependent and unsustainable. Currently there are no proposed public transport improvements which would address this issue. Nor is there any specific reference or proposals in relation to SL03 as to how this issue could be successfully addressed. SL03 appears to conflict with Policy T01 which says "Development will be supported in suitable locations, where it promotes sustainable transport" by meeting various criteria set out in T01 and statements in paragraphs 6.13 and 6.20.	Other: 279 (CPRE Leicestershire)	Planning applications expected to be in compliance with transportation policies (Chapter 16). Proposed mitigations for transport issues would need to be adequately addressed through a Transport Assessment at planning application stage.
Given its location on the edge of the countryside and the loss involved, it is crucial that measures to mitigate harm to nature and secure Biodiversity Gain occurs on site. This can be done by the way nature considerations are designed into the site through maximising green infrastructure, provision of nature corridors or the planting and restoration of hedgerows. Paragraph 15.10 sets out some principles for achieving biodiversity gain which we support and should shape both a revised Policy SL03 and the Masterplan for the site. However, biodiversity gain offsets away from this site will not contribute to the development being sustainable and so, in our view, is not the way forward in this case.	Other: 279 (CPRE Leicestershire)	The Council would expect that planning applications would addresses these issues through policies NEO1 'Protecting designated sites, legally protected and priority species, and priority habitats', NEO2 'Biodiversity Gain' and NEO3 'Green and Blue Infrastructure'
Links to the countryside that provide easy access can be important to creating a sustainable development and is important in this case given the loss of countryside and green wedge	Other: 279 (CPRE Leicestershire)	This will be expected in planning application stage in order to achieve positive design, in accordance with design policies (Chapter 8).
We are surprised that given the City Council's commitment to tackling the Climate Emergency and to achieving net zero by 2030, there are no policy requirements regarding renewable energy provision for this site.	Other: 279 (CPRE Leicestershire)	At planning application stage, proposals for development of the site will be assessed against Policies CCFR01. Sustainable Design and Construction, CCFR02. Whole Life-Cycle Carbon Emissions, CCFR03. Energy Statement, and CCFR04. Low Carbon Heating and Cooling

		of the local plan (Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
We do not offer any specific alternative wording [for the policy] as, in our view, the policy should be withdrawn. We noted the lack of strategic detail, for example, about transport provision, in this policy. If it remains, we do not consider it gives adequate guidance to ensure the development is delivered sustainably or in line with other policies in this plan, such as Policy T01, DQP01, and CCFR01 or statements such 15.10 on Biodiversity Gain principles. To make Policy SL03 sound requires it to set requirements regarding sustainable transport, design, access to town and local centres, biodiversity on the site, links to green spaces and countryside and energy and climate change as well as to housing and development requirements.	Other: 279 (CPRE Leicestershire)	The Council believes that the policy is robust and proportionate as written and should be read alongside the whole Plan.
There are no site mitigations for: 1. Physical topography 2. Adjacent uses 3. Site access 4. Brownfield/greenfield 5. School access 6. Town centre access 7. Health access 8. Employment access 9. Railway access	Other: 283 (Thurcaston Against Development); 286 (Thurcaston & Cropston Parish Council)	These have been included in the assessment of sites, including the Sustainability Appraisal assessment of sites. These issues are expected to be addressed at planning application stage.
The criteria for impact on the road network is presumably linked to the NPPF criteria of severe impact. An amber score has been awarded to this site that notes the site could potentially comply with the indicator. This line of thinking falls deep with the 'predict and provide' paradigm in which the answer is to build more capacity in the highway network. This way of thinking is outdated and the reason why we have so much congestion and why we are such a private vehicle reliant culture.	Other: 283 (Thurcaston Against Development)	The Plan has applied policies in the NPPF to site selection criteria. Severe impacts would be addressed at planning application level through the provision of transport assessments etc and be expected to be in accordance with transportation policies (Chapter 16)
New growth proposed through the Leicester Local Plan will add to congestion and delays, leading to displacement of traffic from the main roads connecting the Charnwood Borough to lower standard alternative routes (e.g., towards the Charnwood Forest, and the M1 North), which in turn will have negative impacts on residents, business, and the quality and vitality of places.		Leicester City Council will continue to work with Charnwood Borough Council and other neighbouring authorities to look into cross boundary impacts of development.

There is insufficient provision, detail, or mitigation within the plan for SL04 to address this serious impact on both the residents of Leicester City Council and those of the bordering boroughs.		The Council believe that the criteria in policy SL04 is sufficient when read alongside all other policies in the Plan.
Focused investment will be required at key points on the Major Road Network to ensure that traffic is able to use 'higher order' routes efficiently, safely and in preference to lower standard routes across the Borough.		It is the Council's view that this site is in a sustainable location and the benefits to the city through allocation of the land
Growth within and without the Borough will result in cumulative impacts across the Borough, i.e., where growth from sites allocated through this Plan and/or in adjoining areas combines at key points on the road network; this is most noticeable around the northern edge of Leicester.		outweighs the benefits of leaving it undeveloped. Further details about the proposed site allocations and the site selection process are in Part 2 of
The NPPF states in relation to sustainable transport 'significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes,' which this site does not.		Document TP/5 Leicester Local Plan 2020 to 2036 Housing and Sites Topic Paper (2023). Sustainable transport modes are anticipated to be in compliance with policy T01 of the Plan.
Document SD/12 Statement of Compliance with the Duty to Cooperate (November 2022) states that the Strategic Transport Assessment is being prepared and will inform longer term growth. This does not address assessment of impact for this site, and thus the duty to cooperate is incomplete.		The Strategic Transport Assessment is ongoing and is being compiled with the neighbouring authorities.
The assessment has given a green RAG rating to the bus stop access category – without detail on access to the site, this can only be inaccurate. The cost of providing a frequent bus service to this location into the city centre would mean it would be highly unlikely. The likelihood is that by the time this development comes, the bus services to be extended would either be gone or would run for an allotted time or conditions on the developer only for the service to be withdrawn the moment the funding/obligation runs out. This is supported by press coverage of proposed loss of bus services throughout the County, including a proposed cut to the current bus service (154) which runs from Thurcaston to Leicester and Loughborough – this is the nearest current bus service to the site. There is unnecessary ambiguity in the frequency of the bus access score. The criteria only states 'regular' but fails to address frequency. The walking distances used for this criterion are above those recommended by CIHT. Cycle routes do not exist on the boundaries to this site (Anstey Lane, Leicester	Other: 283 (Thurcaston Against Development)	All sites have been assessed based on the distance to existing bus stops from a central point in the site. The Council believes this is a proportionate approach to site assessment. The availability of services falls outside the remit of the Local Plan; however the city would consider improving sustainable transport as part of the planning application process.

Road (beyond the Ashton Green development into Thurcaston), Rectory Lane, Mill Lane) and existing footpaths require frequent road crossing by pedestrians. These criteria performance measurements are therefore flawed, unsupportable, and potentially dangerous. The accessibility of the site will lead to a development in this location to become a car-based development. Residents will be reliant on cars to due to poor accessibility to the site and local amenities. Orbital bus provision is partial and infrequent, and no facilities are within walking distance, thus the plan will increase air pollution.		
There is no indication within the plan as it stands now of a local cycling or walking strategy.	Other: 283 (Thurcaston Against Development)	Cycling and walking strategies will be provided at planning application stage through Travel Plans in compliance with Transportation policies (Chapter 16).
Growth within and without the Borough will result in cross-boundary impacts, i.e., where the impacts of sites allocated through this Plan are felt in adjoining areas and vice-versa.	Other: 283 (Thurcaston Against Development)	Cross boundary impacts have been considered in the site assessment and will also be considered through any planning application.
Loss of natural drainage through existing agricultural land, in an area that already increasingly experiences flooding, is insufficiently addressed. Current mitigations are stated as a desire (should), not an instruction. Therefore, the AMR (2019/20 and 2020/21) (Document SD/14a) instruction that 'mitigation measures must be put in place to reduce [flooding] impacts' is not met.	Other: 283 (Thurcaston Against Development)	For the planning application stage, proposal will need to have adequately addressed Sustainable Drainage Systems in line with policy CCFR06.
The Local Plan contradicts other documentation available in that it does not include SL04 as Green Wedge, where it is clearly indicated to be so on Document EB/OS/2a Green Wedge Review Addendum Report (2020).	Other: 283 (Thurcaston Against Development)	SL04 has been proposed for green wedge de-designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of
Document SD/18 Strategic Sites Proposed for Allocation in the Draft Leicester Local Plan (2023) states that the loss of Green Wedge is outweighed by the site's strategic opportunities but takes no account of neighbouring areas. This does not explain, mitigate against, or address the requirement for 'openness,' control of urban sprawl, loss of rural character, how an area of local separation can be maintained, preservation and maintenance of settlement identity of local		retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).

Other: 283 (Thurcaston Against Development)	This figure includes all existing green wedges within the city including the Castle Hill Green Wedge. The Council would like to propose a modification to amend this paragraph.
Other: 283 (Thurcaston Against Development)	Leicester City Council have been working closely with education authorities within the city and the county to establish school needs are met. A planning application has not yet been submitted for the site but would be expected to be resolved at this stage.
Other: 283 (Thurcaston Against Development)	The council is confident that the viability assessment for the local plan is robust.
Other: 283 (Thurcaston Against Development)	The site has been assessed as having a delivery timeframe of 10 years or less, and not expected to be delivered in the first 5 years.
	Against Development) Other: 283 (Thurcaston Against Development) Other: 283 (Thurcaston Against Development) Other: 283 (Thurcaston

Policy requirements, particularly for affordable housing, should be set at a level that takes account of affordable housing and infrastructure needs and allows for the planned types of sites and development to be deliverable, without the need for further viability assessment at the decision-making stage. Affordable housing and infrastructure needs are insufficiently detailed to be deliverable without the need for further viability assessment at a later stage. The plan is thus not deliverable.	Other: 283 (Thurcaston Against Development)	Any planning application would be expected to accord with policy Ho04 'Affordable housing'.
The Local Plan requires provision of air quality, open spaces and leisure opportunities and access to education – this is addressed insufficiently in the current plans.	Other: 283 (Thurcaston Against Development)	Planning applications would be expected to address all of these issues.
There is no specific mention of addressing climate change. This requires alteration to make the policy sound in terms of effective delivery and consistency with National Policy, (NPPF, para. 152). Many of the proposed developments are likely to increase emissions, e.g., transport.	Other: 283 (Thurcaston Against Development)	The Plan meets with criteria in the NPPF as climate change and emissions are addressed throughout the climate change (Chapter 6) and transportation (Chapter
The location of SLO4 in an unsustainable location, the lack of transport initiatives to mitigate the resulting growth in car travel, and the failure to provide evidence to demonstrate that the plan will lead to a reduction in climate emissions make it unsound.		<ul> <li>16) policies.</li> <li>It is the Council's view that the site is in a sustainable location and that the benefits to the city through allocation of the land</li> </ul>
This plan does not meet the existing Climate Emergency Strategy (2022) which states new development should improve environmental standards towards a carbon neutral standard and reduce carbon emissions from travel and transport towards our carbon neutral goals through walking, cycling, improved public transport and ultra-low emissions vehicles.		outweighs the harms. Climate Emergency Strategy (2022) is a separate strategy. Climate policies will help to improve environmental standards as above.
Document Green Infrastructure Strategy (2015-2025) is only applicable until 2025 - this development plan is out of this timeline and is insufficiently future- proofed. In addition, this development contravenes the listed priorities in Document: Priority 1 – sustainable transport and car travel is not addressed; Priority 2 – requires the creation/enhancement of key habitats, conservation of species, improved connectivity to combat potential impacts of climate change and disturbance. Desirable or suggested mitigations are insufficient to address the negative impacts on biodiversity positively; Priority 3 – this plan actively	Other: 283 (Thurcaston Against Development)	The Green Infrastructure Strategy has been used as an evidence base to support the Local Plan and policies created by this. Planning applications are expected to address mitigations for the loss of trees, flood risk, sustainable transport and enhancement of key habitats. This would

discourages use of green transport and non-car routes and gives no details of how public footpaths or cycle ways would be implemented and maintained through the development; Priority 4 – flood risks and attenuation of water during storm events or periods of drought have not been sufficiently addressed, or details of mitigations positively presented. The development plan is likely to cause the loss of existing, established woodland containing mature trees. This includes veteran trees which should be managed and conserved to maximise their habitat value and life span. There will be a loss of productive agricultural farmland at a time of food scarcity.		be through application, within planning decisions, of policies: NEO4 'Ancient Woodland, Veteran Trees, and Irreplaceable Habitats', CCFRO6 'Managing Flood Risk and Sustainable Drainage Systems (SuDS)', TO1 'Sustainable Transport Network' and NEO1 'Protecting designated sites, legally protected and priority species, and priority habitats'. Loss of agricultural farmland has been assessed. It is the Council's view that this site is in a sustainable location and the benefits to the city through allocation of the land outweighs the harms. Further details about the proposed site allocations and the site selection process are in Part 2 of Document TP/5 Leicester Local Plan 2020 to 2036 Housing and Sites Topic Paper (2023).
The development plan does not meet the opportunity for sustainable access routes to work and green space. Distances from assumed access points are too far and not sustainable, thus the use of cars is inevitable.	Other: 283 (Thurcaston Against Development)	It is the view of the council that the sustainable access can be achieved by good design and layout at planning application stage.
The NPPF states that access to a network of high-quality open spaces and opportunities for sport and physical activity is important for the health and well- being of communities. Planning policies should be based on robust and up-to- date assessments of the need for open space, sport, and recreation facilities and opportunities for new provision. Information gained from the assessments should be used to determine what provision is needed, which plans should then seek to accommodate. This requirement is not met within the current plan.	Other: 283 (Thurcaston Against Development)	While the Local Plan does not adopt a standard for the distribution of green space across the city, it does carry forward the existing standard of 2.88 ha of publicly accessible open space per 1,000 population (para. 14.15). The area has been assessed as being in surplus open space and balanced against the need for

		housing in the city, the council believes that this is a suitable development.
It has not been detailed how SLO4 would deliver an overall increase in biodiversity, ensure habitats for wildlife are enhanced and left in a measurably better state than they were pre-development. The requirement is for assessment to take place before submitting plans and demonstrate how biodiversity is being improved.	Other: 283 (Thurcaston Against Development)	This is a matter to be determined at planning application stage in compliance with policy NE02 'Biodiversity Gain'.
'Precise distribution of housing will be subject to further testing' is insufficiently positive and does not support decision-making by external stakeholders.	Other: 283 (Thurcaston Against Development)	This will be tested through the planning application process which will allow for further consultation with stakeholders and neighbours.
Beyond Beaumont Leys shopping centre, access to retail facilities is limited to smaller shops and resources which are not accessible by public transport or on foot.	Other: 283 (Thurcaston Against Development)	All sites have been assessed proportionately using the standard methodology outlined in EB/HO/5 'Housing Sites Methodology November 2022'. The council would expect that constraints, such as access to different facilities, are addressed at planning application stage to achieve sustainable development.
The Charnwood Infrastructure Delivery Plan has direct impact on this site development, as it borders Charnwood Borough Council land, roads, service, and infrastructure directly. Access to the site by foot or car from the north must be through Charnwood. Health, education, and other infrastructure needs will likely be met in part by Charnwood Borough Council. This is insufficiently addressed within the current plan, and within the Duty to Cooperate.	Other: 283 (Thurcaston Against Development)	The Council have consulted and will continue to engage with Charnwood Borough Council through Duty to Cooperate meetings. An agreed Statement of Common Ground is available under SCG/6.
NPPF recognises the importance of advanced, high-quality communications infrastructure as essential for economic growth and social well-being and calls for planning policies to support the expansion of electronic communications networks and full fibre broadband connections. This is not mentioned in the plan. The surrounding areas to SLO4 have extremely poor mobile telephone signal.	Other: 283 (Thurcaston Against Development)	This is referenced within policy DI02 'Electronic Communications' which would be expected to be met at planning application stage.

Site SL04 is not within the proposed transport assessment plan (which states that the assessment for Southeast Leicester is complete, and Northwest Leicester is next to be completed). This shows insufficient cooperation between relevant stakeholders and insufficient detail of how this will be addressed.	Other: 283 (Thurcaston Against Development)	Transport Assessments will be expected as part of a planning application to assess the impacts of proposed transport.
Climate change considerations and mitigations are insufficient.	Other: 286 (Thurcaston & Cropston Parish Council)	Issues to do with climate change will be addressed at planning application stage. This is in line with climate change policies (Chapter 6).
Does not address construction phase – traffic, safety, air and noise pollution	Other: 286 (Thurcaston & Cropston Parish Council)	These issues will need to be considered in respect of design policies, including residential amenity policy (DQP06).
Does not deliver an overall increase in biodiversity.	Other: 286 (Thurcaston & Cropston Parish Council)	Planning application will need to consider policy NE02 'Biodiversity Gain'
Duty to Cooperate: strategies and policies incomplete with insufficient evidence and outcomes: a) Transport assessment b) Cross boundary impacts c) Tree Management d) Biodiversity, ecology e) CCG (NHS) f) Climate Emergency Actions	Other: 286 (Thurcaston & Cropston Parish Council)	These documents will be made available once a planning application has been submitted.
Not deliverable (by LCC) – Affordable housing and infrastructure needs insufficiently detailed.	Other: 286 (Thurcaston & Cropston Parish Council)	The Council is confident that the site is deliverable and will provide detail of affordable housing and infrastructure at planning application stage.
No details of road or pedestrian access, distancing is impossible	Other: 286 (Thurcaston & Cropston Parish Council)	Access points will be established at planning application stage. Distancing is based on centre of site and an identical process has been conducted on all sites.
Flood risk – (assessment, SUDS) – insufficient weight, weak mitigations suggested.	Other: 286 (Thurcaston & Cropston Parish Council)	The Council have considered the views of flooding colleagues in suggested mitigations and believes that the assessment is robust.

Loss of GREEN WEDGE – control of urban sprawl, loss of rural character, area of local separation, preservation and maintenance of settlement identify insufficiently explored.	Other: 286 (Thurcaston & Cropston Parish Council)	SL04 has been proposed for green wedge de-designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
KEY PLANNING is insufficient for schools, healthcare, sustainable transport, distribution of housing, access to retail.	Other: 286 (Thurcaston & Cropston Parish Council)	Planning application is expected to address these issues.
Creation/enhancement/preservation of key habitats, conservation of species (including mature trees).	Other: 286 (Thurcaston & Cropston Parish Council)	The planning application is expected to address these issues through Natural Environment policies 'NE01' and 'NE04'.
A green field site in the LP is land north of the A46 by-pass, for 420 dwellings. As far as we can make out this land is outside the city boundaries but owned by the city council. If built, it will only leave a narrow piece of "green" land between this new development and Rothley. If so it will mean that it will be the only green piece of land from the south boundary of Oadby and the north of Quorn.	353 (Leicester Green Party)	This is only in partial ownership by the Council with the majority being owned by a private landowner, this is within the city's administrative boundaries.
We object to this.		The site has been proposed for green wedge de-designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).

Development of site will lead to destruction of good agricultural land	Local Resident: 502	The site has been deemed suitable and available in coordination with landowner intentions.
This site is in an area that in the 1986 Leicestershire Plan was described as `Physical separation - to the south is the district boundary with Leicester, open land will separate Thurcaston from the developing Beaumont Leys housing areas.' We were told we would have `Green Belt Land' around our villages, then it was downgraded to 'Green Wedges,' now it is nothing!	Local Resident: 502	The site has been proposed for green wedge de-designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
The effect of the increased traffic, the noise and pollution would change our village forever.	Local Resident: 502	These issues would be expected to be addressed at planning application stage through good design in compliance with design policies (Chapter 8).
We used to have badgers, deer, foxes, hedgehogs, butterflies and 43 different species of birds (15 regular bird species and 27 occasional visitors). Sadly, the list has greatly diminished over the years, especially since the A46 Western Bypass and the Glebelands estate was built. If these 400 plus houses are built, we will lose more of our wildlife.	Local Resident: 502	The planning application would be expected to consider wildlife impacts. Protecting designated sites, legally protected and priority species, and priority habitats (Policy NE01) and Biodiversity Gain (policy NE02) would be applied to the planning application in this context.
The footpath across the fields is a good walk for locals and visitors; walking through a housing estate would certainly not be as interesting.	Local Resident: 502	Public Rights of Way will be considered as part of planning applications.
This site is not sustainable, and concerns are raised about inadequate infrastructure, especially road access to the site, as there are no plans for alternative highway routes	Other: 505 (Anstey Parish Council)	Access will be decided as part of the planning application. It is the Council's view that the site is sustainable.

The omission of any improved links to the A46 or alternatives around Anstey village will lead to congestion within the village, especially around the Nook, which is a well-used shopping centre popular with pedestrians.	Other: 505 (Anstey Parish Council)	Road impacts have been considered as part of the site assessment. A Transport Assessment is expected to address these issues at planning application stage.
The A46 road is a natural barrier between the City and County and should remain as such to stop city development having a negative impact on the Borough of Charnwood. The addition of 420 dwellings does not justify the loss of this green wedge land,	Other: 505 (Anstey Parish Council)	The site has been proposed for green wedge de-designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge.
which has been protected as such for many years. Site 261 would lead to the total loss of large areas of green space and to the loss of an area of settlement separation between the city and Thurcaston. Development so close to Anstey will increase pollution and cause a visual intrusion in the area of separation.		Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023).
SL04 not marked on policies map	Local Resident: 68	Site is shown on policies map.
Further information regarding delivery of housing proposed, including proposed figures and schemes.	Statutory Consultee: 162 (Blaby District Council)	Site specific detail to be shared as part of the examination. Master planning to consider further detail including design and mix.
Should be strengthened regarding Green Infrastructure and should set out requirements for the protection and creation of connected Green Infrastructure throughout the site.	Statutory Consultee: 259 (Natural England)	Ongoing dialogue with Natural England. Local Plan (Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)) Policy SL05. Land to the west of Anstey Lane requires provision for green infrastructure on the site. Per para. 4.28, a masterplan for this site will be required and must include provision of green infrastructure. The masterplan for development of the

		site will be assessed against the criteria of Policy NE03. Green and Blue Infrastructure.
Plan should consider the opportunities for resolving permeability challenges with regard to transport connectivity, that the A46 represents. Supporting text for the proposed strategic sites should be widened to refer to the cumulative and cross-boundary transport impacts of these sites on the north-western part of the Leicester Urban Area (both within the city and adjoining areas such as Charnwood District, and including impacts on the Strategic Road Network – i.e. A46).	Statutory Consultee: 267 (Leicestershire County Council)	Ongoing discussions with Leicestershire County Council.
No mention of the primary school infrastructure required.	Statutory Consultee: 267 (Leicestershire County Council)	Ongoing dialogue with County Council. The amount of school provision required for growth under the local plan has been assessed and is set out in Chapter 6 of Document EB/DI/1a Infrastructure Assessment with Infrastructure Delivery Schedule (2022) and in Document EB/DI/2 Infrastructure Assessment (Updated) (Excluding Transportation) – Final Draft (January 2023). The schools planned for in the local plan will meet current and forecast future need as informed by the evidence.
<ul> <li>Policy wording should be amended as follows:</li> <li>To require the impacts of this site to be considered cumulatively with other strategic sites in the northwest quadrant of the city so that a consistent and coordinated approach is taken to dealing with cumulative and cross-boundary transport and education impacts; and</li> <li>To include reference to other highway authorities, i.e., Leicestershire County Council and National Highways in the light of this site's likely impacts on highways for which they are the responsible authority.</li> </ul>	Statutory Consultee: 267 (Leicestershire County Council)	Ongoing discussions with Leicestershire County Council.

Not sure how historic environment been considered.	Statutory Consultee: 300 (Historic England)	The Council have assessed the nearby heritage assets as part of heritage and archaeology constraints on the sites. The Council would expect any development coming forward to consider all heritage constraints. Heritage Impact Assessments will be required as part of the planning application process in accordance with policy HE01.
The accompanying representation demonstrates that the draft Local Plan is unsound given it does not make use of allocation 'Land north of the A46' (draft Policy SL04) efficiently as advocated by Chapter 11 of the NPPF. It is concluded therefore that the Local Plan does not fully comply with the NPPF. Propose amendments to draft Policy SL04 to increase the density of residential development from 420 dwellings to approximately 500 dwellings.	330 (Ridge and Partners LLP on behalf of Parkers Strategic Land Ltd)	Site capacities are indicative, and allocation does not preclude a site coming forward with a different density at planning application stage.
Welcomes master planning for policies to help achieve higher densities	Statutory Consultee: 282 (Harborough District Council)	Support welcomed.
Modification to policy wording suggested to ensure that the impact on Thurcaston Conservation Area is considered and that CBC is consulted on masterplan for the site in relation to this issue.	Statutory Consultee: 311 (Charnwood Borough Council)	As this is a site on the border with Charnwood, the Borough Council would be consulted on the masterplan. The Conservation area has also been considered at site assessment and would be expected to any planning applications through application of policy HE01 'Historic Environment'. A Statement of Common Ground has been established and agreed on regarding these matters, this is under document SCG/6.

## Policy SL05: Sites 309, 718 & 1054 – Land to the west of Anstey Lane

Comments from: 44, 54, 68, 72, 115, 135, 162 (Blaby District Council), 229, 231, 232, 259 (Natural England), 267 (Leicestershire County Council), 282 (Harborough District Council), 311 (Charnwood Borough Council), 317, 343, 361

Main Issues Raised	Rep ID (name of Statutory Consultee or organisation where applicable)	Council's response
Suggest appropriate wording to ensure an integrated approach to education provision on this and adjacent sites, including allocation HA12 in the Charnwood Local Plan, 2021-2037.	Statutory Consultee: 311 (Charnwood Borough Council)	Leicester City Council and Charnwood Borough Council are having ongoing discussions about this issue and have addressed this through a Statement of Common Ground.
The Strategic Sites are concentrated in the north-west part of the city. This is not acceptable; it would be in the public interest to have the Strategic Sites more evenly distributed across Leicester. There is too much of emphasis on building on green wedges and that brownfield sites have not been properly identified and considered as an alternative.	Local Resident: 54	The Council have explored alternative sites proportionately across all areas of the city to address housing needs, this is outlined in the site selection methodology (EB/HO/5). The site has been proposed for green wedge de-designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023). Proposed strategy includes Central Development Area allocation which

		allocates a large proportion of housing need on brownfield land.
All the strategic sites, SL02 to SL06 are all on current Green Wedge. Proposed development on Green Wedges will have a negative impact on the City's open space network. See para 2.31 of the Local Plan.	Local Resident: 72	The site has been proposed for green wedge de-designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023). Proposed strategy includes Central Development Area allocation which allocates a large proportion of housing need on brownfield land.
Policies SL02-SL06 are large developments concentrated in the same area. What processes and procedures have been followed that have meant these sites are clustered in the same area? If these plans go ahead the disruption and dysfunction of the local transport infrastructure will have negative impacts on existing residents and the environment. The plan is supposed to be providing an expansion to housing and jobs for the county, why are other areas of the county then not being asked to accept some of the larger developments too?	Local Resident: 44	<ul> <li>The Council have explored alternative sites proportionately across all areas of the city to address housing needs. The detail of the site selection process is outlined in the site selection methodology (EB/HO/5).</li> <li>The Council have exported a proportion of unmet need to the neighbouring authorities.</li> </ul>
Local Plan Paragraph 14.8 • To prevent the merging of settlements (considering both physical separation and the perception of distance between settlements) • Guiding development form • Providing a 'green lung' into urban areas (including a continuous link between open	Local Resident: 115	The site has been proposed for green wedge de-designation as it is the Council's view that the location is sustainable and the benefits to the city through allocation of the land outweighs the benefits of retaining it as

<ul> <li>countryside and land which penetrates into urban areas) • Providing a recreational resource (including publicly accessible informal and formal recreation facilities)</li> <li>See also paragraph 14.6 "Green wedges have a strategic function and extend beyond the city's administrative boundary into the Leicester Urban Area."</li> <li>Para 14.7 states with regards to Green Wedges: "This gives them a strategic importance as they connect the city to the surrounding Leicestershire countryside."</li> <li>Local Plan OSSR01 "Development in green wedges will be permitted where: a) it does not adversely affect the predominantly open and undeveloped character of the green wedge."</li> <li>The council plans for all of the strategic sites will clearly adversely affect the predominantly open and undeveloped character.</li> </ul>		undeveloped green wedge. Reasons for revising green wedge boundaries can be viewed in Document TP/3 – Leicester Local Plan 2020 to 2036 Green Wedge Topic Paper (2023). Proposed strategy includes Central Development Area allocation which allocates a large proportion of housing need on brownfield land.
All of the strategic sites selected by council officers have a sustainability appraisal of red and amber. Despite the ratings, and opposition/feedback from residents, the city council are still putting these sites forward as the final list of sites that it wishes to be included in the Local Plan for submission for Examination in Public. A reoccurring factor highlighted in the sustainability appraisal for the strategic sites is the remoteness in terms of public transport, and the existing Green Wedge designation, which the council ignore by earmarking these sites for development.	Local Residents: 135, 229, 231, 232	The Council believes that the overall strategic need outweighs any negative scoring in the Sustainability Appraisal. Issues such as access to public transport and green wedge designation were considered as part of site assessments and mitigations required to be addressed in planning application.
These proposed [strategic] sites are within the Beaumont Leys Ward, which has been identified as one of the most deprived areas in Leicester. By increasing the households in Beaumont Leys as a result of the new housing plans, there will be a negative impact on existing residents, as there will inevitably be increased pressures on health services, education and employment.	Local Residents: 135, 229, 231, 232	The Council have explored alternative sites to address housing needs, this is outlined in the site selection methodology (EB/HO/5). Negative impacts on services are expected to be addressed at planning application stage.

The city council are adamant that new housing has to be developed on greenfield sites, which are all located in the West and Northwest of Leicester city. Due to loss of green space, this will have an adverse effect on the mental health and wellbeing of residents.	Local Residents: 135, 229, 231, 232	The Local Plan prioritises new housing development on brownfield sites in the Central Development Area, which is planned to accommodate 6,286 dwellings, which is c. 30% of the city's planned housing provision, over the course of the Local Plan period (Table 1, pp.49-50 of Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
The council needs to explore alternative sites in Leicester to address the housing need, including reviewing sites empty business space and brownfield land as potential housing development. There are two strategic sites the council have failed to consider, which may be more appropriate and suitable for housing development. These are Severn Trent Water land and offices, and Leicestershire County Council offices and land (the County Council are reviewing the purpose and use of this building going forward)	Local Residents: 229, 231, 232	<ul> <li>The representors have suggested two sites for allocation which are outside the city's administrative boundaries. The City Council cannot allocate sites outside its boundaries.</li> <li>The Local Plan prioritises new housing development on brownfield sites in the Central Development Area, which is planned to accommodate 6,286 dwellings, which is c. 30% of the city's planned housing provision, over the course of the Local Plan period (Table 1, pp.49-50 of Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).</li> </ul>
The council needs to explore alternative sites in Leicester to address the housing need, including unlocking housing potential in student accommodation, that is now surplus to requirement because of Covid-19	Local Residents: 229, 231, 232	The Council has explored alternative sites to address housing needs, this is outlined in the site selection methodology (EB/HO/5).

		The assessed local housing need (Documents EB/HO/1 Local Housing Needs Assessment (2022) and EB/HO/1a Local Housing Needs Assessment: Update Addendum (2022)) takes into account meeting the needs of the community including student homes.
The council needs to explore alternative sites in Leicester to address the housing need, including unlocking housing potential in empty homes	Local Residents: 229, 231, 232	Empty homes have been considered in the calculation of overall housing need. This has been explained in the Local Housing Needs Evidence February 2022 update.
The council needs to explore alternative sites in Leicester to address the housing need, including extending existing council houses (relaxing of planning permissions means this may be easier), to create larger family homes	Local Residents: 229, 231, 232	Any future supply and development will need to comply with housing mix and type as specified in the housing mix policy (Ho03) or any future evidence update.
The council needs to explore alternative sites in Leicester to address the housing need, including reviewing and reducing lease terms on occupied council homes. Council home should not be for life, if your financial circumstances improve and you can afford to buy or rent privately, and the same principle, should apply for council house ownership. This ensures fair distribution of resources to those who need it	Local Residents: 229, 231, 232	This is outside of the remit of the Local Plan.
Site contains protected species: merlin, crested newts, common buzzard, badgers (2 setts), flora/fauna/grasses, bullfinches, greenfinches.	Local Resident: 361	A planning application would be expected to consider all protected species in the scheme. This would be expected to apply policy NE01 'Protecting designated sites, legally protected and priority species, and priority habitats'
SL05 not marked out on policies map	Local Resident: 68	Site is shown on policies map.

Detailed information that would allow further assessment and understanding regarding the delivery of housing proposed at the allocated Strategic Sites has not been included within the evidence base. Without further information and detailed breakdowns evidencing the proposed figures and schemes of the allocated strategic sites, proper scrutiny of the proposed housing delivery for these sites cannot take place. Further information regarding these sites would assist proper analysis and scrutiny regarding delivery at these sites.	Statutory Consultee: 162 (Blaby District Council)	The Council is preparing a more detailed Site Allocation Deliverability and Developability Schedule to be shared in due course.
Policy wording should be strengthened regarding Green Infrastructure. It should set out requirements for the protection and creation of connected Green Infrastructure throughout the site. Opportunities should be taken to connect to the surrounding green infrastructure network. Long term maintenance and management should be agreed with the developer at the early stages of the planning process.	Statutory Consultee: 259 (Natural England)	Ongoing dialogue with Natural England. Local Plan (Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)) Policy SL05. Strategic Site 4: Land west of Anstey Lane requires provision for green infrastructure on the site. Per para. 4.32, a masterplan for this site will be required and must include provision of green infrastructure. The masterplan for development of the site will be assessed against the criteria of Policy NE03. Green and Blue Infrastructure.
The policy needs to be strengthened and explicitly acknowledge that the Land West of Anstey Lane allocation is part of a larger cross-boundary development including the adjacent allocation site in Charnwood Borough and potential development land in Blaby District. Specific wording setting out a requirement for comprehensive cross-boundary master planning of the site/development area should be included and should mirror (as closely as possible) wording put forward through the Main Modifications to the Charnwood Plan for the Anstey Pastures (HA12) allocation. If unaddressed at this time, these issues could have potential implications for the deliverability, and thus soundness, of the Plan, should matters in respect of coordination and/or dealing with cumulative and/or cross-boundary impacts come to delay or fetter delivery of proposed site allocations at the planning application stage.	Statutory Consultee: 267 (Leicestershire County Council)	Covered in supporting text (paras. 4.31 and 4.32) and Statement of Common Ground (ongoing) (Document SCG/7 Viability SoCG Land to the West of Anstey Lane (2023)).

Land west of Anstey Lane is a larger housing development but there is no mention of the primary school infrastructure required. The site is on land owned by the City Council but partially located within the County boundary. There is no mention as to whether schools would be placed within the City or County.	Statutory Consultee: 267 (Leicestershire County Council)	Ongoing dialogue with County Council. The amount of school provision required for growth under the local plan has been assessed and is set out in Chapter 6 of Document EB/DI/1a Infrastructure Assessment with Infrastructure Delivery Schedule (2022) and in Document EB/DI/2 Infrastructure Assessment (Updated) (Excluding Transportation) – Final Draft (January 2023). The schools planned for in the local plan will meet current and forecast future need as informed by the evidence.
Supporting text for the proposed strategic sites should be widened to refer to the cumulative and cross-boundary transport impacts of these sites on the north-western part of the Leicester Urban Area (both within the city and adjoining areas such as Charnwood District, and including impacts on the Strategic Road Network – i.e. A46).	Statutory Consultee: 267 (Leicestershire County Council)	Ongoing discussions with the County Council regarding cumulative and cross-boundary transport impacts of the strategic sites.
<ul> <li>Policy wording should be amended as follows:</li> <li>To require the impacts of this site to be considered cumulatively with other strategic sites in the northwest quadrant of the city so that a consistent and coordinated approach is taken to dealing with cumulative and cross-boundary transport and education impacts; and</li> <li>To include reference to other highway authorities, i.e., Leicestershire County Council and National Highways in the light of this site's likely impacts on highways for which they are the responsible authority.</li> </ul>	Statutory Consultee: 267 (Leicestershire County Council)	Ongoing discussions with the County Council regarding cumulative and cross-boundary transport impacts of the strategic sites.
Welcomes master planning for policies to help achieve higher densities.	Statutory Consultee: 282 (Harborough District Council)	Welcomes the support for master planning in the policy.
Landowner confirmation that site is capable of delivering approximately 345 dwellings. Representations are prepared in the context of various supporting	Other: 317 (Pegasus Group on behalf of	Site capacities are indicative, and allocation does not preclude a site

technical documents related to site which has the potential to deliver approximately 345 homes to the west of Anstey Lane. This evidence supports the proposed allocation of this site as a suitable, achievable and available site which can contribute to meeting housing needs over the plan period.	David Wilson Homes (& Leicestershire Partnership NHS Trust and University Hospitals of Leicester NHS Trust))	coming forward with a different density at planning application stage.
Council as landowner is incorrect	Other: 317 (Pegasus Group on behalf of David Wilson Homes (& Leicestershire Partnership NHS Trust and University Hospitals of Leicester NHS Trust))	This will be amended in policy SL05.
We endorse the identification of land west of Anstey Lane through Policy SL05 as a sustainable strategic housing location. William Davis Ltd and Chapman Estates (Leicester) Ltd control land directly adjoining the strategic site to the west of Anstey Lane, within Charnwood and Blaby Boroughs, which is being actively promoted for development. The land in Charnwood is proposed for allocation within Charnwood's emerging Local Plan. In combination the sites can deliver a strategic level of sustainable growth, alongside connective green infrastructure.	Other: 343 (Planning and Design Group on behalf of William Davis Homes Ltd. & Chapman Estates Ltd)	The Council will continue to work with Charnwood Borough Council and landowners to help ensure a coordinated development scheme.
Our green infrastructure assessment, submitted evidence to the Charnwood local plan, shows the potential to deliver a wide and connected green infrastructure network linking key public open space and providing a green, diverse, and connected series of active travel routes leading out from the city to the wider countryside and the Charnwood Forest. The potential to deliver public access and a connected GI network ensures that green wedge functions are appropriately addressed alongside housing delivery.	Other: 343 (Planning and Design Group on behalf of William Davis Homes Ltd. & Chapman Estates Ltd)	The Council will continue to work with Charnwood Borough Council and landowners to help ensure a coordinated development scheme.
The site is deliverable and provides a full opportunity to achieve a sustainable form of development that balances the need to supply homes with the mitigation and minimisation of environmental impacts.	Other: 343 (Planning and Design Group on behalf of William Davis Homes Ltd. & Chapman Estates Ltd)	Support for the site development is welcomed.

Proposed additional wording to the policy in italics:	Other: 343 (Planning	This is a matter which is part of the
	and Design Group on	agreed matters in the SoCG (Document
Facilities and services:	behalf of William Davis	SCG/7 Viability SoCG Land to the West
Cross boundary co-operation between key stakeholders will be needed around	Homes Ltd. & Chapman	of Anstey Lane (2023)) for this site.
education provision on this site. This will include apportioned financial contributions	Estates Ltd)	
to all land and build costs of a new 1FE primary school, including within cross		
boundary locations, if required to serve the cross-boundary growth location, unless		
contributing to alternative, agreed school provision.		

## Policy SL06: Site 464 – Beaumont Park

Comments from: 4, 10, 44, 52, 54, 63, 68, 72, 115, 123, 164, 166, 167, 168, 170, 171, 173, 174, 175, 176, 177, 178, 181, 182, 183, 184, 185, 186, 187, 188, 190, 191, 192, 193, 194, 195, 196, 197, 198, 203, 206, 208, 209, 211, 212, 213, 214, 215, 216, 217, 218, 228, 229, 263 (Save Beaumont Park Group), 267 (Leicestershire County Council), 273, 326 (North West Leicestershire), 327, 354, 358, 503, 512, 513

Main Issues Raised	Rep ID (name of Statutory Consultee and organisation where applicable)	Council's response
This decision to allocate 12 pitches for traveller and gypsy use is not of a sound nature. It is a concern as the area in the planning is the only large green space available to those locally. The area is used as a walkway between the shopping centre and housing estates for many people including young children, elderly and vulnerable people. The Traveller/gypsy site would lead to higher levels of crime in the area and will prevent people from using the walkways which in turn will cut people off from family and friends due to being too scared to use the area. The Traveller/gypsy site will have no positive impact on the local community and does not provide any benefit to others.	Local Resident: 4	The city's need for Gypsy & Traveller transit sites was identified in the 2019 GTAA addendum (EB/HO/2a). The 2022 Gypsy and Traveller Site Selection Paper (EB/HO/2b) outlines the methodology which lead to the allocation of 12 transit pitches at Beaumont Park.
This proposal as it will cause extra traffic	Local Resident: 10	Transport Impact Assessments will be expected as part of any planning application for the site.
The Gypsy & Traveller site could potentially cause safety issues	Local Resident: 10	The 2022 Gypsy and Traveller Site Selection Paper (EB/HO/2b) outlines the methodology which lead to the allocation of 12 transit pitches at Beaumont Park.
To build on this park would be environmentally unhealthy and would take away people's mental wellbeing. It is important that we have a green space to exercise that is free from traffic for both adults and children.	Local Resident: 10	The City Council's administrative boundaries are very tightly constrained to such extent that the city has grown beyond them in almost every direction. To meet Leicester's housing target, all potential areas for development must be considered. It is the

		Council's view that this site is in a sustainable location and the benefits to the city through allocation of the land outweighs the harms. Further details about the proposed site allocations and the site selection process are in Part 2 of Document TP/5 Leicester Local Plan 2020 to 2036 Housing and Sites Topic Paper (2023).
The proposal has not received satisfactory mitigations as required by Nature England, or these mitigations have not been shared.	Local Residents: 52, 164, 166, 167, 168, 170, 171, 173, 174, 175, 176, 177, 178, 181, 182, 183, 184, 185, 186, 187, 188, 190, 191, 192, 193, 194, 195, 196, 197, 198, 203, 206, 208, 209, 211, 212, 213, 214, 215, 216, 217, 218 Other: 123 (Save Beaumont Park), 263 (Save Beaumont Park Group), 354 (Leicester City Councillor Hemant Rae Bhatia)	Natural England did not submit a Representation at the Regulation 19 or Regulation 18 consultations regarding this site.
The proposal has not received satisfactory mitigations as required by Sport England, or these mitigations have not been shared.	Local Residents: 52, 164, 166, 167, 168, 170, 171, 173, 174, 175, 176, 177, 178, 181, 182, 183, 184, 185, 186, 187, 188, 190, 191, 192, 193, 194, 195, 196, 197, 198, 203, 206, 208, 209, 211, 212, 213, 214, 215, 216, 217, 218	Sport England did not submit a Representation at the Regulation 19 or Regulation 18 consultations regarding this site.

	Other: 123 (Save Beaumont Park), 263 (Save Beaumont Park Group), 354 (Leicester City Councillor Hemant Rae Bhatia)	
The proposal is not justified. It fails to take into account reasonable or proportionate alternatives. Beaumont Park is one of the last remaining green spaces in one of the UK's most deprived neighbourhoods. It has recently benefited from investment to make it accessible and safe.	Local Residents: 52, 164, 166, 167, 168, 170, 171, 173, 174, 175, 176, 177, 178, 181, 182, 183, 184, 185, 186, 187, 188, 190, 191, 192, 193, 194, 195, 196, 197, 198, 203, 206, 208, 209, 211, 212, 213, 214, 215, 216, 217, 218	The Council has explored alternative sites to address housing needs, this is outlined in the site selection methodology (EB/HO/5). Details of any proposed development on strategic sites will be assessed against Policy OSSR03 Open Space in New Development
	Other: 123 (Save Beaumont Park), 263 (Save Beaumont Park Group), 354 (Leicester City Councillor Hemant Rae Bhatia)	Open Space in New Development, Policy DQP01 Design Principles, Policy DQP06 Landscape Design and Policy NE02 Biodiversity Gain.
The proposal is contrary to Leicester's joint Health and Wellbeing Strategy.	Local Residents: 52, 164, 166, 167, 168, 170, 171, 173, 174, 175, 176, 177, 178, 181, 182, 183, 184, 185, 186, 187, 188, 190, 191, 192, 193, 194, 195, 196, 197, 198, 203, 206, 208, 209, 211, 212, 213, 214, 215, 216, 217, 218	The council believes that the policy is in line with The Joint Health and Wellbeing Strategy and Action Plan 2019
	Other: 123 (Save Beaumont Park), 263 (Save Beaumont Park Group), 354 (Leicester City Councillor Hemant Rae Bhatia)	
The proposal is contrary to Leicester's Climate Emergency Plan.	Local Residents: 52, 164, 166, 167, 168, 170, 171, 173, 174,	The council believes that the policy is in line with The Leicester Climate

	175, 176, 177, 178, 181, 182, 183, 184, 185, 186, 187, 188,	Emergency Strategy (2020-2023) and Leicester City Council's Climate
	190, 191, 192, 193, 194, 195,	Emergency Action Plan (2020-2023)
	196, 197, 198, 203, 206, 208,	
	209, 211, 212, 213, 214, 215,	
	216, 217, 218	
	Other: 123 (Save Beaumont	
	Park), 263 (Save Beaumont	
	Park Group), 354 (Leicester	
	City Councillor Hemant Rae	
	Bhatia)	
The proposal is contrary to Leicester's Green Infrastructure Strategy.	Local Residents: 52, 164, 166,	The council believes that the policy
	167, 168, 170, 171, 173, 174,	is in line with The Green
	175, 176, 177, 178, 181, 182,	Infrastructure Strategy (2015-2025)
	183, 184, 185, 186, 187, 188,	(EB/NE/1)
	190, 191, 192, 193, 194, 195,	
	196, 197, 198, 203, 206, 208,	
	209, 211, 212, 213, 214, 215,	
	216, 217, 218	
	Other: 123 (Save Beaumont	
	Park), 263 (Save Beaumont	
	Park Group), 354 (Leicester	
	City Councillor Hemant Rae	
	Bhatia)	
The development proposes 7.14 ha of employment development within the	Local Residents: 52, 164, 166,	Details of any proposed
wider 19.72 ha site, approximately 25,000sqm of floorspace for light industry,	167, 168, 170, 171, 173, 174,	development on strategic sites will
general industry, and storage and distribution uses (with ancillary offices). The	175, 176, 177, 178, 181, 182,	be assessed against Policy OSSR03
proposal fails to address, ecology, trees, land contamination, design quality,	183, 184, 185, 186, 187, 188,	Open Space in New Development,
and the impact of the removal of sports provision.	190, 191, 192, 193, 194, 195,	Policy DQP01 Design Principles,
	196, 197, 198, 203, 206, 208,	Policy DQP06 Landscape Design and
	209, 211, 212, 213, 214, 215,	Policy NE02 Biodiversity Gain.
	216, 217, 218	

The National Survey Report on HGV parking estimates that there is currently capacity for 2,167 HGVs at on-site parking facilities in the East Midlands. Overnight demand is just over 3,000 HGVs per night, equating to a shortfall in the capacity of around 865 HGVs. The draft plan recommends that the issue of future HGV parking provision in Leicestershire be acknowledged in relevant growth plans and transport strategies for Leicester and Leicestershire, and a consideration in respect of future development via policy in the Local Plan. The report states that road and rail freight vehicles must decarbonise by 2050 if the UK is to meet its challenging climate change targets. Currently, domestic transport accounts for 27% of the UK's total greenhouse gas (GHG) emissions (and has only decreased by 2% since 1990), with road and rail freight combined being responsible for 6% of total GHG emissions. Freight transport also has an impact on air quality. Road transport currently accounts for 32% of Nitrogen Oxides (NOx) pollution, with HGVs and vans making up 46% of the contribution. This proposal will increase HGV travel and parking requirements in the area and short of signalling a roundabout, no other accounts for increased HGV traffic or meeting overnight HGV parking needs have been included.	Other: 123 (Save Beaumont Park), 263 (Save Beaumont Park Group) Local Residents: 52, 164, 166, 167, 168, 170, 171, 173, 174, 175, 176, 177, 178, 181, 182, 183, 184, 185, 186, 187, 188, 190, 191, 192, 193, 194, 195, 196, 197, 198, 203, 206, 208, 209, 211, 212, 213, 214, 215, 216, 217, 218 Other: 123 (Save Beaumont Park), 263 (Save Beaumont Park Group)	Any forthcoming application on the site would require a Transport Assessment and Air Quality Management Assessment.
The proposal fails on its Duty to Cooperate - Leicester's Local Nature Partnership has not been consulted on this plan.	Local Residents: 52, 164, 166, 167, 168, 170, 171, 173, 174, 175, 176, 177, 178, 181, 182, 183, 184, 185, 186, 187, 188, 190, 191, 192, 193, 194, 203, 206, 208, 209, 211, 212, 213, 214, 215, 216, 217, 218 Other: 123 (Save Beaumont Park), 263 (Save Beaumont Park Group)	All people were consulted and provided an opportunity to respond.
All of the strategic sites selected by council officers have a sustainability appraisal of red and amber. Despite the ratings, and opposition/feedback from residents, the city council are still putting these sites forward as the final list of	Local Residents: 135, 229, 231, 232	The Council believes that the overall strategic need outweighs any

sites that it wishes to be included in the Local Plan for submission for Examination in Public. A reoccurring factor highlighted in the sustainability appraisal for the strategic sites is the remoteness in terms of public transport, and the existing Green Wedge designation, which the council ignore by earmarking these sites for development.		negative scoring in the Sustainability Appraisal. Issues such as access to public transport and green wedge designation were considered as part of site assessments and mitigations required to be addressed in planning application.
These proposed [strategic] sites are within the Beaumont Leys Ward, which has been identified as one of the most deprived areas in Leicester. By increasing the households in Beaumont Leys as a result of the new housing plans, there will be a negative impact on existing residents, as there will inevitably be increased pressures on health services, education and employment.	Local Residents: 135, 229, 231, 232	The Council have explored alternative sites to address housing needs, this is outlined in the site selection methodology (EB/HO/5). Negative impacts on services are expected to be addressed at planning application stage.
The city council are adamant that new housing has to be developed on greenfield sites, which are all located in the West and Northwest of Leicester city. Due to loss of green space, this will have an adverse effect on the mental health and wellbeing of residents.	Local Residents: 135, 229, 231, 232	The Local Plan prioritises new housing development on brownfield sites in the Central Development Area, which is planned to accommodate 6,286 dwellings, which is c. 30% of the city's planned housing provision, over the course of the Local Plan period (Table 1, pp.49-50 of Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
The council needs to explore alternative sites in Leicester to address the housing need, including reviewing sites empty business space and brownfield land as potential housing development. There are two strategic sites the council have failed to consider, which may be more appropriate and suitable for housing development. These are Severn Trent Water land and offices, and	Local Residents: 229, 231, 232	The Beaumont Park allocation is intended to deliver employment development and Gypsy & Traveller Provision.

Leicestershire County Council offices and land (the County Council are reviewing the purpose and use of this building going forward)		The Local Plan prioritises new development on brownfield sites in the Central Development Area. The Council have explored alternative sites proportionately across all areas of the city to address its needs.
The council needs to explore alternative sites in Leicester to address the housing need, including unlocking housing potential in student accommodation, that is now surplus to requirement because of Covid-19	Local Residents: 229, 231, 232	The Beaumont Park allocation is intended to deliver employment development and Gypsy & Traveller Provision. Alternative sites have been assessed based on standard methodologies and landowner intentions.
The council needs to explore alternative sites in Leicester to address the housing need, including unlocking housing potential in empty homes	Local Residents: 229, 231, 232	The Beaumont Park allocation is intended to deliver employment development and Gypsy & Traveller Provision. Alternative sites have been assessed based on standard methodologies and landowner intentions.
The council needs to explore alternative sites in Leicester to address the housing need, including extending existing council houses (relaxing of planning permissions means this may be easier), to create larger family homes	Local Residents: 229, 231, 232	The Beaumont Park allocation is intended to deliver employment development and Gypsy & Traveller Provision. Alternative sites have been assessed based on standard methodologies and landowner intentions.
The council needs to explore alternative sites in Leicester to address the housing need, including reviewing and reducing lease terms on occupied council homes. Council home should not be for life, if your financial circumstances improve and you can afford to buy or rent privately, and the	Local Residents: 229, 231, 232	The Beaumont Park allocation is intended to deliver employment development and Gypsy & Traveller Provision. Alternative sites have been assessed based on standard

same principle, should apply for council house ownership. This ensures fair distribution of resources to those who need it		methodologies and landowner intentions.
Beaumont Park is the only publicly accessible area of open green space in the area. It is well used by Beaumont Leys residents.	Local Resident: 358	Details of any proposed development on strategic sites will be assessed against Policy OSSR03 Open Space in New Development and Policy DQP06 Landscape Design at application stage.
Industrial uses will cause adverse impacts including increases in traffic, litter, and noise pollution.	Local Resident: 358	Transport Impact Assessments will be expected as part of any planning application for the site. Any application would be expected to adhere to Policies T01 Sustainable transport Network and T02 Climate Change and Air Quality.
The proposed gypsy and traveller site would make the area unsafe and undesirable.	Local Resident: 358	The 2022 Gypsy and Traveller Site Selection Paper (EB/HO/2b) outlines the methodology which lead to the allocation of 12 transit pitches at Beaumont Park.
Beaumont Park is a haven for wildlife.	Local Resident: 358	Details of any proposed development on strategic sites will be assessed against Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design and Policy NE02 Biodiversity Gain.
We have more than enough unused industrial areas in Leicester without the need for ripping up a park to provide more industrial units.	Local Resident: 512, 513	The overall strategic need for employment land in the city is outlined in the Economic Development Needs Assessment (2020) (Documents EB/EM/1 and EB/EM/1a).

The area's infrastructure cannot sustain any more traffic.	Local Resident: 512, 513	Transport Impact Assessments will be expected as part of any planning application for the site.
DMU would welcome further engagement with the Council in respect of this land allocation, specifically given the addition of the 12 caravan spaces. This has emerged since the 2020 draft Plan and DMU would like to understand which part of the site the provision for gypsy and traveller transit accommodation is being proposed	Other: 63 (Diane Bowers of Turley on behalf of De Montfort University (Steven Hatherley))	The precise location of gypsy and traveller transit pitches will be determined at planning application stage. Master planning of the site will be provided in due course.
At present, the policy is not 'positively prepared' as it has not been informed by agreements with relevant stakeholders (DMU should be considered a relevant stakeholder given their strong and positive presence within the district, and particularly given that this strategic allocation may impact upon how their adjacent sports hub site operates). DMU requests further information about the indicative site layout and access etc. to inform on whether the proposed strategic allocation would have any detrimental impact on DMU's adjacent sports hub.	Other: 63 (Diane Bowers of Turley on behalf of De Montfort University (Steven Hatherley))	A masterplan will be shared in due course.
There is no reference to the surrounding land uses within the Council's Site Allocations document (specific to this allocation). As such it is recommended that the amenity of surrounding land uses is included as a requirement within the second to last bullet point (in respect of matters that future development will need to address).	Other: 63 (Diane Bowers of Turley on behalf of De Montfort University (Steven Hatherley))	These were considered as part the site assessments work and the council is of the opinion that these uses are compatible.
Objection to the inclusion of a Gypsy and Traveller transit site. Concern that the inclusion of a Gypsy and Traveller transit site does not represent an appropriate or suitable location for such development. Caution is raised about the relationship of the proposed development with existing surrounding development.	Other: 273 (Alder King Planning Consultants on behalf of The TBL Property Partnership and Beaumont Leys Properties Limited)	The 2022 Gypsy and Traveller Site Selection Paper (EB/HO/2b) outlines the methodology which lead to the allocation of 12 transit pitches at Beaumont Park.
In considering the suitability of allocating a Gypsy and Traveller transit site at Beaumont Park, regard should be had to the principles of the emerging Local Plan Policy, Ho12 which requires that, "The site should provide a safe environment for intended occupants". The proposed site at Beaumont Park is known to be one which is contaminated, and which suffers from historic underground gas levels which have prevented the site being considered suitable for residential allocation previously. It is questioned whether the siting		

of a transit site close to a busy road with its associated issues of noise and air quality is appropriate. It is questioned whether the proposed co-location of a Gypsy and Traveller transit site with a strategic employment allocation is appropriate. Gypsies and Travellers are particularly vulnerable to noise and disturbance and there is the potential that the two proposed uses will not be mutually beneficial. The potential allocation of a transit site near the existing town centre may not provide a standard of residential amenity given the noise,		
<ul> <li>and disturbance associated with the normal running and operation of the town centre from essential activities, including servicing.</li> <li>The other site identified at Thurcaston Road (Policy E01) is more suitable and appropriate site for transit provision as it is a site where unauthorised encampments already occur, indicating it is a location which the travelling community wish to be located; it is not located adjacent to any major roads and</li> </ul>	Other: 273 (Alder King Planning Consultants on behalf of The TBL Property Partnership and Beaumont	Support welcomed for Gypsy and traveller allocation at site 687.
as such would not be compromised by noise or air quality issues; it is greenfield and not known to suffer from any contamination issues; it is not subject to any significant restrictions and is large enough to provide sufficient space for the transit site whilst protecting the amenity of residents; and it is accessible and well located having regard to essential services and facilities.	Leys Properties Limited)	
It is questioned whether Document EB/HO/2 Gypsy, Traveller and Travelling Show people Accommodation Assessment (May 2017) and Document EB/HO/2a Gypsy and Traveller Accommodation Assessment Addendum (September 2019) remain up-to-date and robust to justify future allocations. It is questioned why two sites, Beaumont Park (Policy SL06) and Thurcaston Road (E01) are both identified as potentially being suitable for transit provision of 12 caravans when there is only a requirement for one site of 12 caravans.	Other: 273 (Alder King Planning Consultants on behalf of The TBL Property Partnership and Beaumont Leys Properties Limited)	The Council have commissioned an update to the study which should be published in 2024.
In assessing the site at Beaumont Park, a 'downside' to its potential allocation was its proximity to the two existing Gypsy and Traveller sites at Greengate Nook and Red Hill. Despite this, the Beaumont Park site has been taken forward as a potential allocation. This is surprising given that numerous other sites were seemingly dismissed for this reason alone. It is questioned whether a consistent approach has been used in assessing the sites.	Other: 273 (Alder King Planning Consultants on behalf of The TBL Property Partnership and Beaumont Leys Properties Limited)	The benefits of allocating Beaumont Park outweighed the fact that it is within reasonable proximity to two other Gypsy & traveller sites. It should be noted that Beaumont Park is a Transit allocation whereas the existing Greengate Nook and Red Hill sites feature Permanent Pitches.

Draft policy wording suggests only 7 ha (of the 20-ha comprising the proposed allocation) would be developed, indicating that this would be to the east of the area. There is no further commentary on the potential location of development. That results in uncertainty as how and where such development is proposed. It may result in unintended adverse impacts on the successful operation of the town centre. Based on recent records, approximately 13% of shoppers access the town centre by foot, the majority from the east through Beaumont Park.	Other: 273 (Alder King Planning Consultants on behalf of The TBL Property Partnership and Beaumont Leys Properties Limited)	A masterplan will be shared in due course.
FedEx is supportive of the Council's approach in the allocation of the Beaumont Park site for employment uses as per Paragraph 81 of the NPPF. The identification of the site as a strategic site for employment will encourage the agglomeration of businesses and industrial uses. This would attract inward investment and foster economic growth. FedEx agrees with the guidance contained within para. 4.33 of the draft Local Plan which states that the eastern portion of Beaumont Part would be suitable for employment development. The redevelopment of Beaumont Park would represent a natural extension to the existing industrial location that FedEx forms part of.	Other: 293 (Savills on behalf of FedEx)	Support Welcomed
Concerns around the soundness tests regarding the introduction of Gypsy & Traveller accommodation as part of the wider site allocation. Any proposed allocation for this use or any other type of residential accommodation needs to be sympathetic towards existing businesses in the area. This is in addition to potential impacts on future occupants of the Beaumont Park site when it comes forward to deliver the 25,000 sqm of employment floorspace proposed for allocation. NPPF paragraph 187 states that planning policies should ensure that new development can be integrated effectively with existing businesses. There are further industrial uses nearby that can operate 24/7, in addition to the nearby Beaumont Park Stadium which is used as a speedway track for dirt bike racing. It is understood that events at the track take place on weekday	Other: 293 (Savills on behalf of FedEx)	The city's need for Gypsy & Traveller transit sites was identified in the 2019 GTAA addendum (EB/HO/2a). The 2022 Gypsy and Traveller Site Selection Paper (EB/HO/2b) outlines the methodology which lead to the allocation of 12 transit pitches at Beaumont Park. The Council have assessed sites across the city and considers Beaumont Park to be a suitable location.
nights and generate significant amounts of noise. Introducing residential use on the site would not meet the Council's Gypsy and Traveller Site Selection Paper criteria: providing safe and convenient access, environmental quality, and flood risk. On the face of it residential uses would not be able to be integrated effectively with existing businesses.		

<ul> <li>FedEx has concerns around the potential for future residents to complain about its operations, which would be contrary to NPPF, para. 187 Agent of Change principle.</li> <li>Future occupants of the Beaumont Park site would be affected by being located close to gypsy and traveller accommodation such that their operations would be compromised. The allocation of the site to incorporate gypsy and traveller accommodation would not be compliant with the policy requirements contained within NPPF paragraph 187 unless Strategic Site Policy SL06 is worded more carefully.</li> </ul>	Other: 293 (Savills on behalf of FedEx)	Any forthcoming application to address the Gypsy & Traveller need would be expected to adhere the requirements of policy Ho12 "Gypsy, Traveller and Travelling Showpeople.", specifically point f).
In accordance with para. 187, the 'agent of change' should be obligated to provide suitable mitigation, to not negatively impact the operations of nearby businesses. These mitigation measures could include being set back further from the boundaries of the employment sites and landscaping measures.		
If the site is allocated for the accommodation of traveller pitches, it is suggested that these pitches should be sited towards the western end of the proposed site allocation. This would be a more appropriate location as it is furthest away from existing industrial uses. The accommodation would be better located near the local amenities of the Beaumont Leys Shopping Centre. This would be aligned with the criteria set out within policies Ho12 and DQP06.	Other: 293 (Savills on behalf of FedEx)	The precise location of gypsy and traveller transit pitches will be determined at planning application stage. Master planning of the site will be provided in due course.
<ul> <li>We consider Policy SL06 could be updated as follows:</li> <li>Reducing the extent of the SL06 allocation to create a sensible buffer distance between the development site and FedEx's site (instead of the boundary of the proposed allocation currently proposed to adjoin FedEx's site).</li> <li>Commitments to maintaining or enhancing existing site boundary vegetation to maintain separation distances (understood to be located on land within the control of the Local Planning Authority).</li> <li>Amending bullet point four of the policy to read [with our additions in italics] 'Gypsy and traveller transit site <i>located at the western side of Beaumont Park</i> that could accommodate 12 caravan spaces. <i>In addition to the general planning requirements within Policy SL06, development will need to address impacts associated with the agent of change principle for existing businesses and future occupiers at Beaumont Park'.</i></li> </ul>	Other: 293 (Savills on behalf of FedEx)	The precise location of gypsy and traveller transit pitches will be determined at planning application stage. Master planning of the site will be provided in due course.

- Showing the location of the gypsy and traveller accommodation at the western end of the Beaumont Park site on the Proposals Map		
My constituents feel that these green spaces [Beaumont Park (SL06) and Thurcaston Road / Hadrian Road Open Space (E01)] must be protected.	Other: 327 (Liz Kendall MP)	Details of any proposed development on strategic sites will be assessed against Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design and Policy NE02 Biodiversity Gain.
My constituents question why any additional transit Gypsy and Traveller sites are necessary in the local area. There have been minimal unauthorised encampments across Beaumont Leys and Abbey wards in recent times, and there are already permanent Gypsy and Traveller sites nearby. Where is the evidence that any more are required. What is the rationale for the only two new sites being proposed in this area when 81 sites were assessed across the city?	Other: 327 (Liz Kendall MP)	The city's need for Gypsy & Traveller transit sites was identified in the 2019 GTAA addendum (EB/HO/2a). The 2022 Gypsy and Traveller Site Selection Paper (EB/HO/2b) outlines the methodology which lead to the allocation of 12 transit pitches at Beaumont Park.
My constituents are angry that they were not told about this change [the addition of the G&T transit site] in the original draft Plan and that there has been no formal public consultation about these proposals. Every effort should have been made to ensure residents were aware much sooner and had an opportunity for their views to be genuinely expressed and listened to.	Other: 327 (Liz Kendall MP)	The Gypsy & Traveller Transit Provision was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is an opportunity to submit representations.
This site has been through the local plan consultations since 2014. In each round it maintained the proposal which was set out at the outset. But now, right after the final open public consultation ended in Sept 2020 (which by the way took place right at the peak of Covid-19 pandemic and thus very few could participate) a travellers' transit site was added to the plan. This late inclusion doesn't allow the public to make a representation to their own elected representatives anymore for a local level review, but it can only go before a government inspector now. This appears to have been done with some other	Other: 354 (Leicester City Councillor Hemant Rae Bhatia)	The Gypsy & Traveller Transit Provision was added to the site allocation between the regulation 18 and regulation 19 stages of Local Plan preparation. The additional use for the site was consulted on at the Regulation 19 consultation which is

intent. As a result, over 2,500 residents have signed a petition which has been submitted as part of this consultation against this site and urges the inspector to take that into account. The city council until now has adopted a standard process whereby after each public consultation it has eliminated some sites which were challenged or deemed unfit. In this case however it is just the opposite. Making additions to the plan so late is neither legal nor sound and it falls short on duty to co-operate. Since the transit site was added at a very late stage after the final public consultation was over in Sept 2020, this must be removed from the plan.		an opportunity to submit representations.
Beaumont Leys already has a fixed travellers' site which was established in 2010. Travellers don't need to come into the city to make a transit halt. There have only been two illegal encampments in the last 2.5 years as per the Multi Agency Travellers Unit's (MATU) own records. These were quickly dispersed. Therefore, there is no need for this transit site.	Other: 354 (Leicester City Councillor Hemant Rae Bhatia)	The city's need for Gypsy & Traveller transit sites was identified in the 2019 GTAA addendum (EB/HO/2a). The 2022 Gypsy and Traveller Site Selection Paper (EB/HO/2b) outlines the methodology which lead to the allocation of 12 transit pitches at Beaumont Park.
The green space and nature help with residents' mental health issues which are quite high in the area.	Other: 354 (Leicester City Councillor Hemant Rae Bhatia)	Details of any proposed development on strategic sites will be assessed against Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design.
The greenery in this park supports wildlife and other environmental needs.	Other: 354 (Leicester City Councillor Hemant Rae Bhatia)	Details of any proposed development on strategic sites will be assessed against Policy OSSR03 Open Space in New Development, Policy DQP06 Landscape Design and Policy NE02 Biodiversity Gain.
The land underneath the park is contaminated as per the council's own assessment. Building on it would undermine the health of future employees on this site.	Other: 354 (Leicester City Councillor Hemant Rae Bhatia)	At application stage, details of any proposed development for the site will need to address land

		contamination as specified within Policy SL06.
With various sites on the nearby Ashton Green development resulting in up to 3,000 new homes, vehicular traffic will increase exponentially. That combined with traffic emerging from these commercial units will aggravate the situation residents already face with tailbacks of polluting cars, overcrowding of side streets with inappropriate parking.	Other: 354 (Leicester City Councillor Hemant Rae Bhatia)	Transport Impact Assessments will be expected as part of any planning application for the site.
This proposal will increase HGV movements and parking needs. HGVs contribute 46% of NO <sub>2</sub> contributions from all road traffic. This will worsen air quality in the area.		
Despite encouraging the use of public transport, the reality is that those who will work at these premises travelling either from the city or from nearby cities/county will need their own transportation. This is more so for those operate in shift patterns as public transport becomes ineffective due to the time of the day/night.	Other: 354 (Leicester City Councillor Hemant Rae Bhatia)	Any forthcoming applications to develop the site will be expected to ahead to policies in Chapter 16 "Transportation", specifically Policy T01 "Sustainable Transport Network".
The site allocation should be altered to consume no more than 25% of the 21 hectares available. This will balance the employment needs with the need to maintain green coverage. There are other brown field sites available to use. The council has already earmarked and sold large parts of nearby Ashton Green land for commercial needs. Beaumont Leys has been disproportionately affected and it has given more towards its local plan obligations. Keeping people's lives safe and healthy is the council's top priority. By making these suggested changes, it will help achieving towards that.	Other: 354 (Leicester City Councillor Hemant Rae Bhatia)	The Local Plan prioritises new development on brownfield sites in the Central Development Area. The Council have explored alternative sites proportionately across all areas of the city to address its needs.
Ongoing petition received from local politician. The main issues raised are against the development of greenspace, concerns about play space, effects on mental health and alternate sites could be used.	Other: 503 (Liz Kendall MP)	Considered as part of site assessments and mitigations.

## Chapter 5 – Housing

Comments from: 42, 63, 152, 159, 162 (Blaby District Council), 247, 255, 258, 261, 267 (Leicestershire County Council), 282 (Harborough District Council), 287, 288, 289, 297, 300, 315, 316, 317, 331, 333 (Hinckley & Bosworth Borough Council), 334, 353, 355

Main Issues Raised	Rep ID (name of Statutory	Council Response and Action
	Consultee if applicable)	
Limited information available from which to assess the robustness of the Council's overall Housing Land Supply. The windfall allowance seems very high	316 (Home Builders Federation)	Proportionate and up to date evidence has been used to inform housing supply. Windfall allowance is based on past trends which is covered in Housing Sites Methodology November 2022 evidence.
Plan is flawed because of the way it seeks to redistribute its housing requirement but it is also flawed because of an unstable reliance on a SoCG which is not universally supported by surrounding Authorities.	297 (Willoughby Waterleys Residents' Association)	Proportionate and up to date evidence has been used, detailed assessments including a Sustainability Appraisal has been carried out to determine where growth is to be allocated.
		The SoCG has been signed by all authorities except Hinckley & Bosworth BC which is deliberating on the matter and is due to come to a conclusion at the end of January 2024.
		Harborough signed the SoCG in December 2023
Should build on brownfield land first.	353 (Leicester Green Party)	A key strategy of the Plan is to accommodate growth on brownfield land. About 30% of growth has been

		proposed to be in Central Development Area.
New housing should be highly energy efficient, have solar panels and/or heat pumps and that the site should include green spaces accessible to all with plenty of trees.	353 (Leicester Green Party)	This has been addressed in the climate change and open space chapters. Plan policies from whole plan have to read together to support future development.
Larger housing developments must also include local facilities such as schools, health centres, shops etc. to avoid as much traveling as possible.	353 (Leicester Green Party)	An Infrastructure study identifies the infrastructure required for growth. Site allocations will still need planning application to allow any development which will consider the infrastructure requirement at that stage.
Is there a plan "B" if the adjacent local authorities do not agree to the building of the 18,000 plus houses which Leicester cannot find the space for?	353 (Leicester Green Party)	This will be dealt with as part of the Examination. Also the Statement of Common Ground includes a clause that suggests that it will be reviewed should a change in situation arise.
Para 5.1 - Evidence base referenced in paragraph 5.1 to be sense-checked against the emerging National Planning Policy Framework.	258(Barton Willmore (now Stantec) on behalf of the Co- Operative group)	Evidence base and plan are in compliance with the NPPF
Para 5.4 - There is a need to look beyond 2036 to 2040 in relation to housing and employment needs, in order to comply with NPPF, paragraph 22.	317 (Pegasus Group on behalf David Wilson Homes, Leicestershire Partnership NHS	Plan will be reviewed after 5 years or sooner from adoption. This is addressed in Housing Topic Paper.

Two authorities, have not signed the Statement of Common Ground.	Trust and University Hospitals of Leicester NHS Trust)	Harborough District Council have now signed the Statement of Common Ground. Hinckley and Bosworth Borough Council will consider it in January 2024.
Para 5.10:		
Windfall allowance seems very high. The Council should confirm that in the future Policy Ho02: Housing Development on Unallocated Sites and Policy DQP05: Backland, Tandem & Infill Development will not impede windfall sites from coming forward at the same rate as past delivery. Also question whether reliance on the seven-year average is robust enough to support such this level of allowance of the whole plan period, especially in light of the impact of covid.	316 (Home Builders Federation)	Policy Ho02 refers to design policies which work together to support windfall development. As per the NPPF, windfall allowance is based on past trends including years before pandemic. This is covered in Housing Sites Methodology evidence.
Para 5.20 - Supporting text should confirm that sites with good levels of public transport accessibility, proximity to the city centre, and where higher densities can be achieved, are better suited to provide a mix of smaller dwellings.	287 (RPS Consulting Services Limited on behalf of Highcross Shopping Centre)	Concerns raised here are addressed through overall strategy and covered in chapters including Transport. Sites are expected to be in compliance with Ho03 (Housing Mix) to provide a mix of housing type.
Para 5.50 - Data within the Gypsy & Traveller Accommodation Assessment (2017 & 2019) shows families that both meet and do not meet the current definition, the plan only includes provision for those that do meet the definition.	267 (Leicestershire County Council)	With regards to recent changes in the definition (Lisa Smith case), and its effects on planning for Gypsies & Travellers, the Plan Policies were written before the case began. However, the Council is in the process of updating the evidence base.

The Criteria Based Policy Ho12 for private developments is sound and in line with many other local plans in Leicestershire.		Support for Policy Ho12 welcomed
Policy Ho01 – Housing Allocations		
Policy is not considered to be sound. Site Allocations Document does not consider the existing land uses that surround the proposed allocations. Therefore, part (e) of the Policy should be updated to state: "Respect the character of the area in compliance with the surrounding land uses, and the environmental, design, amenity (DQP06), and heritage policies in the Local Plan". This amendment would satisfy DMU given any new residential development will need to consider the potential impacts that may arise because of the development, specifically in respect of Policy DQP06 (Residential Amenity).	63 (De Montfort University)	Surrounding land uses have been considered as part of individual sites suitability assessments. Reference to design policies is included in Ho01.
Support policy as site at Gartree Road included as non-strategic housing allocation.	258 (Stantec on behalf of The Co-operative Group)	Support welcomed and noted.
The council should also allocate more small sites to comply with the 10% small site requirement and to provide certainty for SME builders.	316 (Home Builders Federation)	Site size thresholds are in compliance with national policy, joint L&L SHELAA methodology. Site allocations in the plan are based on availability and achievability.
The policy also refers to a Site Allocations DPD. The Council should clarify the status of this document and the timetable for its production.		Policy refers to non-strategic sites allocations document which should be read alongside Policy Ho01. This is covered in the policy.
Would like to introduce a new site allocation at Land Lying to the South of Evington Lane of 0.42ha for around 30 dwellings.	334 (RG&P on behalf of Greyrock Properties Limited)	Will be considered as part of the SHELAA update and any subsequent review of the plan
Policy Ho02 – Housing Development on Unallocated Sites		

Policy Ho02 and supporting text should also make reference to including brownfield sites	255 (Councillor Sue Waddington)	The policy and supporting text in para 5.18 do not preclude windfall development on brownfield sites.
Support - policy ensures that Plan is sufficiently flexible to allow such sites to come forward and ensure that the Council can continue to meet as much of its housing need as it can.	258 (Stantec on behalf of The Co-operative Group)	Support welcomed and noted.
Policy HO02 states that proposals for housing development on unallocated sites will be supported in accordance with Policy SL01, yet Policy SL01 only supports residential development on allocated sites.	289 (Anchor)	The Council will remove reference to SL01 from policy Ho02 as part of minor modification.
Unsound and not justified as reasonable alternatives haven't been considered. The Council have failed in their DUTY TO COOPERATE, because they have failed to consider the impact on green sites. Concerns over building on allocated greenfield sites. In previous local plans green sites had greater protection. Sites across the city were allocated either residential, retail, employment, leisure recreation sport and biodiversity enhancement sites.	350 (Cllr Nigel Porter)	The Policy has been appraised as part of the SA/SEA. Policies in Chapter 14 Open Space, Sport and Recreation have criteria that applications will be assessed against regarding development on Open Space and Green Wedge. This is a new local plan which has been prepared in compliance with the NPPF. Previous plans were made and adopted in 2006 and 2014.
Policy Ho03 – Housing Mix		
Need for older people's housing must be incorporated into the Local Plan to be consistent with national policy by identifying older person's housing need within policy SLO1 by including reference to older persons' housing need.	152 (McCarthy Stone),	Policy SL01 is a high-level policy guiding overall strategy for new development and does not cover the detail of housing mix which is included in Policy Ho03 which is informed by the Local Housing Needs Assessment.
Suggest deleting 'and expected to meet the technical standard for access of Building Regulations 2015 Part M4(2) or any subsequent revisions' from point b) of policy Ho 03 Housing Mix to read 'Proposals for supported living including retirement homes, sheltered homes and care homes will be supported'.		The council has a commitment to support accessible and adaptable

Rename policy to 'Housing Mix and Specialist Housing for Older People.'		dwellings and so Policy Ho03 includes criterion (b).
Allocate specific sites to meet the needs of older people that are in the most sustainable locations close to key services.		The housing allocations will be required to provide a mix of housing (Ho03) when an application is submitted.
Also, policy does not identify a defined percentage of older persons housing.	159 (Gladman Retirement	Local Housing Needs Assessment) identifies the need for older persons' housing and informs the policy referring to Tables 2 and 3 in the Plan. Add new policy to plan as part of examination.
The policy as currently drafted is generic and provides limited support for specialist older persons housing. The plan does not accord with para 62 as the size, type and tenure of specialist older persons housing is not reflected in the plan. Policy not effective as there is no mechanism to ensure all typologies are met over the plan period. Suggestion to include a separate policy to specifically address the needs of specialist older persons' accommodation.	Living Ltd),	Action: Suggest a main modification to add new policy to plan.
The only figure provided is for C2 units (without definition it is not clear if this is care homes, nursing homes, extra care etc), fails to differentiate between different types and tenures of specialist housing for older people, does not address the need for each which is set out in Figure 4: Modelled Demand for Older Person Housing of the Local Housing Needs Assessment: Update Addendum 2022.		The population and household projections assume that the equivalent of 316 dwellings will be vacated by those moving to Class C2. If these moves do not occur because Class C2 bedspaces are not delivered, then 316 more Class C3 dwellings will be required. If Class C2 bedspaces are delivered, they can be counted at a ratio of 1.8 bedspaces equals 1 dwelling in the LHN figures
Concerned that Criterion A does not require a proportion of homes to be delivered specially for older people, instead only requires proposals to seek to provide an appropriate mix. This, combined with the strategic housing allocations (SL02 – SL06) not requiring housing for older people, Policy SL01	289 (Anchor)	The criterion facilitates the provision of housing mix which will be informed by the evidence base.

not allowing unallocated sites to come forward and the fact that developers of housing for older people struggle to compete with general needs housebuilders, will result in homes for older people not being delivered in Leicester during the plan period, despite the clear identified need.		All policies in the plan will have to be in compliance with the housing mix policy, so that would not preclude the applications for older people housing to come forward in line with the identified need.
Welcome Criterion B but would like this to reflect in SL01 and support proposals on windfall sites.		The policies in the local plan should be read alongside housing mix policies. Repetition in policies has been avoided.
Lack of clarity in policy with reference to evidenced needs and Tables 2 and 3. To be effective, policy should require a mix of tenures and property sizes to be delivered which reflects the latest evidence on need (which could change over the plan period), and the type of residential development proposed. Also question the reference to 316 homes needing to be C2 dwellings (Table 3) when the SHMA identifies a need for 1,829 additional extra care homes between 2020 and 2036. Combined with sheltered housing, there is an identified need for 5,830 homes for older people over the plan period, which equates to 28% of the proposed housing target. In respect of market and affordable tenures, the policy should allow for specialist accommodation for older people to have a tenure mix that reflects evidenced needs. Property sizes would also need to be specific to the proposed development, with older people requiring one and two-bedroom homes rather than 3 and 4+-bedroom homes		The policy includes reference to the latest evidence that may be produced during the plan period. Leicester local plan is informed by the local housing needs evidence as opposed to any other HMA wide evidence and is in compliance with Government guidance and is robust and proportionate. Class C2 figure is outlined in Figure 25 of the Local Housing Needs Assessment which considers the projected growth in those in Class C2 in the population and household projections
Support the wide range of housing need, however for city centre locations, context and the nature of demand is likely to result in a greater proportion of smaller units. Suggest strengthening of policy to include location of the site and its suitability for particular population cohorts as additional wording	261 (Marron Planning on behalf of Charles Street Buildings)	Location and suitability for particular population cohorts will be assessed as part of overall planning

within the policy. Suggest following change to policy (additions in red, deletions with strikethrough):		application considerations based on other policies in the plan.
The Local Plan will seek to achieve a mix of house types, tenures and sizes, taking into account the evidenced needs, market conditions, viability, site specific circumstances, (including the location of the site and its suitability for particular population cohorts). Current evidence of need such as that illustrated in Table 2 and Table 3, will also be a material consideration.		Policy is robustly prepared.
a) Proposals for residential development should seek to provide an appropriate mix and size of dwellings to meet the needs of current and future households in the city including family housing, units for small households, extra care and accessible housing, having regard to the latest evidence of housing need"		
Criterion c) states that all homes will be expected to be built to accessible and adaptable standards (M4(2)) and 10% of affordable housing will be expected to meet the M4(3) technical standards.	315 (Gladman Development Ltd.)	Policy has been informed by robust and proportionate local housing needs evidence and has been
Building Regulations M4(2) and M4(3) are optional, and PPG provides additional guidance on use of these optional standards. Gladman encourage the Council to ensure that this policy is robust in its justification by accounting for the factors within the PPG. Gladman would welcome the flexibility in any requirement where viability is an issue but note that the baseline requirement should be set so that this is not necessary.		supported by Whole Plan Viability assessment including these requirements.
The requirements to meet Part M4(2) will be superseded by changes to residential Building Regulations. Subject to further consultation this will be implemented in due course. So the requirement in the policy is unnecessary and should be deleted, as it will soon be a national standard.	316 (Home Builders Federation)	The requirement is included in the policy in response to the identified need from the evidence. To be in compliance with the NPPF requirement, it is useful to keep the policy in the plan.
There is also a need to differentiate between Part a) and part b) of M4(3) technical standards.		Will be considered as part of the plan review.

Policy Ho04 – Affordable Housing		
Want plan to clarify that the affordable housing minimum doesn't include Class C2. The council should clarify that the affordable requirements applies only to C3 residential developments. At present, the council do not seek affordable housing from Use Class C2 and it is believed that the Council's intention is for this to continue (see for example planning application reference 20190433, affordable not sought) and this should be made clear in the wording of policy Ho04 to ensure there is no ambiguity Suggestion to include specific reference in policy Ho04 that any development falling into Use Class C2 will not be expected to provide affordable housing. This could alternatively be inserted into the explanatory text to the policy	159 (Gladman Retirement Living Ltd)	The policy is informed by evidence and Clause b of the policy mentions that type and mix of affordable housing sought will reflect Policy Ho03 or any other subsequent housing needs evidence. Suggest including wording in policy as a main modification to clarify that C2 contributions will not be expected.
Alter wording to recognise affordable Build to Rent accommodation. Policy does not recognise the form of affordable housing (affordable private rent) which is provided within BTR developments.	247 (Watkin Jones Group)	Clause b of the policy mentions that type and mix of affordable housing sought will reflect Policy HoO3 or any other subsequent housing needs evidence.
Co-Living – this tenure is not recognised within the draft Local Plan Suggest altering policy to recognise the type of affordable housing delivered by BTR developments.		Co-living can be considered at plan review once adopted? Co-living proposals will be considered on a Development Management case by case basis.
Policy should be amended to provide sufficient flexibility for a lower provision of affordable housing in the event that site -specific circumstances, including matters of viability, would stall otherwise sustainable developments coming forward.	258 (Stantec on behalf of The Co-operative Group)	Clause a) of policy includes wording which covers lower targets.
Criteria e) neglects the full range of affordable housing as set out in Annex 2 of the NPPF.	316 (Home Builders Federation)	<ul> <li>Policy covers both affordable home ownership and rented.</li> <li>We already have a high overall housing need, of which about 50% is being exported to neighbouring</li> </ul>

Considering the identified Affordable Housing Need and past delivery, additional open market housing should be considered to help deliver more affordable homes in line with the PPG. Criteria b) is correct place to reference M43b) of the Building Regulations (technical standards) with regards to requirements fully wheelchair accessible housing		areas in the HMA, having a higher target for more homes is going to increase our unmet need. The council's current affordable housing target is based on viability suggestions.
nousing		Support welcomed and noted.
Paragraph 5.28 indicates that Council is intending to continue to rely on the 2011 Affordable Housing SPD for the calculation of its commuted sums. The SPD hangs off the Policy CS7 in the Core Strategy which will be superseded by this new Local Plan and is also very dated and should not be considered		Para includes reference to a separate guidance that will be prepared in due course.
<ul><li>'current evidence'.</li><li>Paragraph states that separate guidance will be prepared setting out the amount of commuted sums. Policy should clearly set out the Council's approach to commuted sums in sufficient detail to determine a planning</li></ul>		This will be a detailed document and cannot be included within policy.
application without relying on other criteria or guidelines set out in a separate Guidance.		No action on point about commuted sums.
Policy neglects the full range of affordable housing as set out in Annex 2 of the NPPF. Changing the type of affordable housing provided can help to improve viability of a specific site, and the plan should recognise this. Additional		
flexibility should be included in this policy.		Policy has been informed by robust and proportionate evidence supported by Viability assessment.
Plan should state that at least half the new housing be affordable either to buy, part buy or with affordable rents.	353 (Leicester Green Party)	Plan includes affordable housing targets that have been informed by the whole plan viability assessment.

Affordable housing need should be based on local researched needs rather than an overall standard.	355 (Climate Action Leicester and Leicestershire & Friends of the Earth)	Policy is based upon proportionate evidence, taking in account whole plan viability.
Policy Ho05 – Housing Densities		
In support	331 (Cllr David Bill Hinckley)	Support welcomed and noted.
In support	333 (Hinckley & Bosworth Borough Council)	Support welcomed and noted.
Increase density from 2 to 3 storey houses, particularly in urban area.	42 (local resident)	Densities included in policy are minimum.
Support the policy as such and the supporting text in para 5.30, however policy could be amended to be explicit that the density figures are targets only, and to specifically state that each development proposal is to be considered on its individual merits to ensure that Policy is flexible and site- specific considerations can be taken into account.	258 (Stantec on behalf of The Co-operative Group)	Addressed in supporting text in para 5.30.
The proposed two-tiered approach for densities is inflexible and is unlikely to provide a variety of typologies to meet the housing needs of different groups. A range of density standards specific to different areas of the city is necessary to ensure that any proposed density is appropriate to the character of the surrounding area. Density needs to be considered on a site by site basis to ensure schemes are viable, deliverable, appropriate for the site.	316 (Home Builders Federation)	Addressed in supporting text in paras 5.29 and 5.30. Policy suggests minimum densities and does not preclude a different density to come forward which will be assessed on individual merits.
Minimum density figure stated by policy Ho05 could be more ambitious in attempting to meet the housing numbers required by the city. Provide Greater specificity through design guidance regarding acceptable and expected densities for development for specific character areas within the CDA as well as for areas across the city where higher densities are thought to be achievable. Policy Ho05 can then refer to this guidance in the policy text to ensure that "as much of the identified need for housing as possible" can be met.	162 (Blaby District Council)	Policy suggests minimum densities and does not preclude a different density to come forward which will be assessed on individual merits.

Increase in density from Reg 18 welcomed.	282 (Harborough District	Support welcomed and noted.
Higher densities that are viable in excess of minimum densities should be encouraged where viable and appropriate.	Council)	Density targets in policy are minimum and do not preclude higher densities to come forward which will be assessed on individual merits.
In respect of the historic environment, due to potential sensitivities of some proposal allocation sites, lower densities than 35 dw/ha may be required. Suggest wording change to policy to include 'unless material considerations indicate otherwise'	300 (Historic England)	Supporting text states that applications will be considered on individual merit.
Prefer building brownfield before greenfield sites. Where it is necessary to build on Greenfield sites, expect developments to be high density leaving 50% of the land free for green space and flood defences.	353 (Leicester Green Party),	Densities have been increased between Reg 18 and Reg 19. Densities mentioned in policy do not preclude higher densities to come forward which will be assessed on individual merits.
Housing densities in new development should be 100 dph minimum in central area and 70 dph elsewhere to reduce car dependency and make efficient use of greenfield land. This addition will make Local Plan sound by taking a proactive approach to mitigating and adapting to climate change and ensuring the future resilience of communities and infrastructure.	355 (Climate Action Leicester and Leicestershire & Friends of the Earth)	The densities targets are guided by the joint Leicester & Leicestershire SHELAA methodology, are also minimum and will not preclude higher density schemes coming forward which will be assessed on individual merits.
Policy Ho06 – Self-build / Custom-build		
To be in line with other Local Plans for self-build plots after an agreed period of marketing, they can be developed for market housing.	267 (Leicestershire County Council)	Provision like that would undermine the purpose of policy.
Support policy as such however recommend a mechanism for self-build and custom-build plots to be sold as market housing after 12 months of marketing to ensure flexibility in policy to deliver homes.	315 (Gladman Development)	Same as above.
HBF does not consider that requiring major developments to provide for self- build is appropriate, similarly the HBF considers a requirement for all	316 (Home Builders Federation)	Council required to identify the need for self-build and custom build and

developments over ten units to be provide self-build/custom build plots or units is not appropriate. The policy should be deleted.		address that need through local plan and policies.
Evidence including Council's self-build register should be made available for developers.		Under data protection the register cannot be made public.
Policy Ho07 – Internal Space Standards		
An inflexible policy approach to NDSS for all new dwellings will impact on affordability and effect customer choice. Well-designed dwellings below NDSS can provided a good, functional home. Smaller dwellings play a valuable role in meeting specific needs for both open market and affordable home ownership housing. The Council should focus on good design and usable space to ensure that dwellings are fit for purpose rather than focusing on NDSS.	316 (Home Builders Federation)	It is national requirement to provide suitable living environment. This policy will ensure that through meeting internal space standards.
If the proposed requirement for NDSS is carried forward, then the Council should put forward proposals for transitional arrangements. The land deals underpinning residential sites may have been secured prior to any proposed introduction of the NDSS. These sites should be allowed to move through the planning system before any proposed policy requirements are enforced. The NDSS should not be applied to any reserved matters applications or any outline or detailed approval prior to a specified date.		The Council has prepared evidence that supports the policy as it is.
Policy Ho08 – Student Development		
In support	247 (Watkins Jones Group)	Support welcomed.
DMU support the principles of this policy however suggest amending the title to "DM POLICY Ho08 Student Residential Accommodation Development". As currently worded, it could be construed to apply to any development that students may use for example teaching or student support facilities. Amending the title will reduce any ambiguity and be clear that the policy applies only to student residential accommodation.	63 (De Montfort University)	Amend title as a minor modification.

Student housing needs to meet the same or higher energy standards as other housing and needs to be adaptable for other residential uses.	355 (Climate Action Leicester and Leicestershire and Friends of the Earth)	Policy CCFR01 is intended to apply to all development.
Policy Ho09 – Retention of Family Housing		
-No Comments-		
Policy Ho10 – Houses in Multiple Occupation		
-No Comments-		
Policy Ho11 – Hostels		
-No Comments-		
Policy Ho12 – Gypsy, Traveller and Travelling Showpeople		
In support	267 (Leicestershire County Council)	Support welcomed.
Given the University does not directly fall within the category of 'residents, business, or the local environment,' it is suggested that additional wording is inserted in clause (f) of the policy to ensure all surrounding land uses are considered relevant to this element of the Policy. For example, "There should be no significant detrimental impact upon the amenity of nearby uses, including residents, businesses, or the local environment.	63 (De Montfort University)	To be dealt with as part of the examination as a modification to policy. Suggested modification to clause (f) of policy.

### Chapter 6 – Climate Change and Flood Risk

Comments from: 63, 68, 226, 258, 259 (Natural England), 267 (Leicestershire County Council), 279 (CPRE Leicestershire), 282 (Harborough District Council), 316, 321, 328 (Severn Trent Water), 331, 333 (Hinckley & Bosworth Borough Council), 353, 355

Main Issues Raised	Rep ID (name of Statutory Consultee or organisation where applicable)	Council Response
No evident analysis of the actions or policies in the plan to demonstrate that the overall plan will contribute to the mitigation of climate change. Emphasis directed towards energy use and heating/cooling buildings. Flood risk should be considered separately.	Local Resident: 226	<ul> <li>The climate change policies have been informed by evidence commissioned for this purpose,</li> <li>Document EB/CC/1 Energy and Sustainable Design and Construction study (2022). The Local Plan does not concentrate only on energy use and heating/cooling buildings, but also contains policies on a sustainable transport network (Policy T01), climate change and air quality (Policy T02), biodiversity gain (Policy NE02), creation of open space in new development (Policy OSSR03), improving air quality by tree planting (including productive trees) and other methods (Policy HW01), creation of sustainable drainage systems and enhancing watercourses for biodiversity (Policy CCFR06), and improving water efficiency (Policy CCFR01).</li> <li>Further, the Local Plan commits the City Council to assess the performance of individual policies and overall progress in delivering the strategic objectives of the Local Plan through the production of an Authority Monitoring Report (AMR) (para. 21.3 of SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).</li> </ul>

		Regarding the point that flood risk should be considered separately, climate change and flood risk are two separate parts of the same chapter.
No reference back to either Objective 2 on climate change or to Objective 9 and fails to link policies to an overall strategic climate change policy.	Other: 279 (CPRE Leicestershire)	Objective 2 is one of the Local Plan's key objectives. These inform and support the overarching vision of the Plan. The Climate Change and Flood Risk chapter policies should not be read only in relation to Objective 2 and Objective 9, but as with all the Plan's policies, they should be understood in the context of all the Local Plan's key objectives, as well as the Local Plan Vision.
		The Local Plan does not have a strategic climate change policy, but the policies in the Climate Change and Flood Risk chapter, as well as the other Local Plan policies which work to mitigate and adapt to climate change, should not be read in isolation, but should be understood in relation to each other as part of an integrated and coherent approach to addressing climate change.
Incomplete justification for policies and lack of evaluation of how policy and delivery expectations will make a difference to achieving the reduction of carbon emissions.	Other: 279 (CPRE Leicestershire)	The City Council believes that the policies are justified as they have been informed by evidence commissioned for this purpose, Document EB/CC/1 Energy and Sustainable Design and Construction study (2022).
		The Local Plan commits the City Council to assess the performance of individual policies and overall progress in delivering the strategic objectives of the Local Plan through the production of an Authority Monitoring Report (AMR) (para. 21.3 of SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).

New policy is required around preventing front gardens being paved over.	Other: 355 (Climate Action Leicester and Leicestershire & Friends of the Earth)	While the Local Plan does not have a specific policy relating to preventing gardens from being paved, Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) ensures that SuDS will be included in all development. This will reduce surface water runoff.
Plan does not have measurable or clear targets to support climate change policies.	Other: 355 (Climate Action Leicester and Leicestershire & Friends of the Earth)	The Local Plan commits the City Council to assess the performance of individual policies and overall progress in delivering the strategic objectives of the Local Plan through the production of an Authority Monitoring Report (AMR) (para. 21.3 of SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
Development should be zero carbon climate resilient	Other: 353 (Leicester Green Party)	The Local Plan policies go as far as possible to mitigate and adapt to climate change, whilst having to take into account whole plan viability.
Para 6.4 - Need to work strategically with neighbouring authorities in regard to climate change.	Statutory Consultee: 282 (Harborough District Council)	This is actively being pursued in relation to the Local Plan through Duty to Cooperate meetings with the County Council and councils of our neighbouring districts and boroughs.
Para 6.6 – Policy being strengthened at next review is too far away.	Local Resident: 226	Policy reviews take place at 5-year intervals or sooner. This is standard procedure.
Para 6.7 - The "zero carbon emissions by 2030" target requires actions and policies fit for purpose and stated within this plan.	Local Resident: 68	The policies in the Local Plan will help the City Council work towards achieving zero carbon emissions by 2030. However, that objective will not be achieved solely via the Local Plan. Other City Council strategies will also further progress towards meeting the 2030 goal.
Para 6.9 – in support.	Other: 321 (Water Resources West)	Welcomed.

Para 6.12 - The references around renewable energy and waste need clarification particularly around the role of biomass.	Other: 355 (Climate Action Leicester and Leicestershire & Friends of the Earth)	The reference should be to para. 6.17 of the Local Plan, not para. 6.12. The paragraph acknowledges that biomass combustion technologies aren't suitable in certain built-up areas, but also states that these technologies should not be ruled out entirely. Certain exceptional proposals for energy generation from biomass combustion technology may be considered, such as where there is an existing source of sustainably and locally sourced waste biomass. Further detail on exceptional cases warranting consideration can be viewed in section 5.2.7 of Document EB/CC/1 Energy and sustainable design and construction study (2022).
Para 6.14 - The plan needs to explain how modal shift will be achieved in absence of Workplace Parking Levy.	Other: 355 (Climate Action Leicester and Leicestershire & Friends of the Earth)	The Local Plan includes a policy on a sustainable transport network (Policy T01) and policies with criteria on: improving pedestrian and cycle access and promoting active travel by making the public realm and pedestrian and cycle routes safer and more attractive (Policy HW01); prioritising and encouraging walking and cycling by providing routes that are safe, well connected, convenient and accessible for all (Policy DQP01); and ensuring that new development will enable people to make responsible transport choices, by having suitable and affordable alternative options to the car easily available (Policy T03). These will help to achieve the modal shift to more sustainable transportation.
Para 6.29 – Inclusion of final two sentences as part of this paragraph causes confusion, suggest creating a new paragraph.	Other: 328 (Severn Trent Water)	The Council agrees that this can be made clearer with two paragraphs and will provide this as part of a minor modification.
Policy CCFR01 - Sustainable Design and Construction		

In support	Other: 63 (Diane Bowers of Turley on Behalf of De Montfort University (Steven Hatherley)), 321 (Water Resources West), 328 (Severn Trent Water), 355 (Climate Action Leicester and Leicestershire & Friends of the Earth)	Welcomed.
Reference to building regs should be omitted as plan deals with planning regulation.	Other: 258 (Barton Willmore (now Stantec) on behalf of The Co-Operative Group)	The Planning and Energy Act 2008 enables local authorities to require standards for energy efficiency in new buildings beyond those set in the Building Regulations
Policy could be strengthened with nature-based solutions for climate change adaptation including green roofs and walls, street trees, and wetlands.	Statutory Consultee: 259 (Natural England)	The Local Plan should be read as a whole. Nature- based solutions to mitigate and adapt to climate change are detailed in Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS), Policy HW01. A Healthy and Active City, Policy NE02. Biodiversity Gain, Policy NE03. Green and Blue Infrastructure, Policy DQP03. Landscape Design, and Policy OSSR03. Open Space in New Development.
Include wording within the policy around the provision of electric vehicle charging infrastructure on new developments.	Statutory Consultee: 267 (Leicestershire County Council)	The Local Plan should be read as a whole. Provision of electric vehicle charging infrastructure in new developments is detailed in Policy T07. Car Parking.
Little reference to retrofitting of measures to address carbon emissions from buildings.	Statutory Consultee: 267 (Leicestershire County Council)	Para 6.9 acknowledges the important role of retrofitting in contributing to reducing the city's greenhouse gas emissions.
Requirements for new residential development to achieve a 10% reduction in carbon emissions beyond building regulation Part L is unnecessary and unjustified.	Other: 316 (Home Builders Federation)	The Planning and Energy Act 2008 enables local authorities to require standards for energy efficiency in new buildings beyond those set in the Building Regulations. The policy has been informed by evidence commissioned for this purpose,

		Document EB/CC/1 Energy and Sustainable Design and Construction study (2022). The study states in Section 6.2.2 that a 10% reduction in carbon emissions from residential development compared to Part L of the 2013 Building Regulations is typically feasible.
Requirements for new residential development to achieve a reduction in carbon emissions should be increased to 19% above Building Regulations.	Other: 355 (Climate Action Leicester and Leicestershire & Friends of the Earth)	The policy has been informed by evidence commissioned for this purpose, Document EB/CC/1 Energy and Sustainable Design and Construction study (2022). The study states in Section 6.2.2 that a 10% reduction in carbon emissions from residential development compared to Part L of the 2013 Building Regulations is typically feasible. Document EB/DI/3 Whole Plan Viability Assessment (2022) tested the policy and found that its requirements do not unduly affect viability. However, a greater percentage reduction achieved through passive, fabric, and energy efficient design measures alone has not been tested and may adversely affect viability.
Policy CCFR02 - Whole Life-Cycle Carbon Emissions		
In support	Other: 63 (Diane Bowers of Turley on Behalf of De Montfort University (Steven Hatherley))	Welcomed.
Lack of evaluation of how policy and delivery expectations will make a difference to the reduction of carbon emissions.	Other: 279 (CPRE Leicestershire)	Details will be provided in a future SPD/Supplementary plan. The Local Plan commits the City Council to assess the performance of individual policies and overall progress in delivering the strategic objectives of the Local Plan through the production of an Authority Monitoring Report (AMR) (para. 21.3 of SD/2 Leicester Local Plan

		2020-2036 Submission (Regulation 19 publication) Plan (January 2023)).
Policy does not serve a clear purpose and it is not evident how a decision maker should react to development proposals.	Other: 316 (Home Builders Federation)	Details will be provided in a future SPD/Supplementary plan. It is the City Council's opinion that the purpose of the policy is clear, which is to require assessment and consideration of measures to lower whole life-cycle carbon emissions for all development. It is considered that all development can take actions to minimise whole life-cycle carbon emissions. As calculating whole life-cycle carbon emissions is still in its infancy, the policy is worded to allow flexibility in how different scales of development should demonstrate compliance. The policy has been informed by evidence commissioned for this purpose, Document EB/CC/1 Energy and Sustainable Design and Construction study (2022). Further detail on the basis for this policy can be viewed in section 6.7 of the study.
Policy CCFR03 - Energy Statement		
In support	Other: 63 (Diane Bowers of Turley on Behalf of De Montfort University (Steven Hatherley))	Welcomed.
Policy gives Development Plan status to a document (Future SPD), which is not part of the Plan.	Other: 316 (Home Builders Federation)	Council acknowledges that the development plan is the key document in decision making
Policy CCFR04 - Low Carbon Heating and Cooling		
In support	Other: 63 (Diane Bowers of Turley on Behalf of De Montfort University (Steven Hatherley))	Welcomed.

Requirements of policy are overly onerous for small-large scale developments (less than 100 dwellings).	Other: 258 (Barton Willmore (now Stantec) on behalf of The Co-Operative Group)	Document EB/DI/3 Whole Plan Viability Assessment (2022) tested the policy and found that its requirements do not unduly affect viability.
Not necessary to make more connections to the heat network. Heat networks are one aspect of the path towards decarbonising heat, however currently the predominant technology for district-sized communal heating networks is gas combined heat and power (CHP) plants. As 2050 approaches, reducing greenhouse gas emissions to net zero will require a transition from gas-fired networks to renewable or low carbon alternatives. But at the moment one of the major reasons why heat network projects do not install such technologies is because of the up-front capital cost. The Council should be aware that for the foreseeable future it will remain uneconomic for most heat networks to install low-carbon technologies.	Other: 316 (Home Builders Federation)	The policy has been informed by evidence commissioned for this purpose, Document EB/CC/1 Energy and Sustainable Design and Construction study (2022). It is acknowledged that heat networks at present often utilise gas-fired CHP systems, future heat networks will need to deliver low or zero carbon heat and therefore are likely to utilise large-scale heat pump technology or waste heat sources. Presently, heat networks can offer greater efficiencies. At the national level, the Government are committed to the expansion of heat networks through the existing Heat Network Investment Project (HNIP) and proposed Green Heat Network Fund (GHNF). This provides confidence that it is appropriate to include policy that seeks greater accommodation for future connection to the heat network. Further detail can be found in Section 6.4 of Document EB/CC/1 Energy and Sustainable Design and Construction study (2022).
Policy should require heat pumps where district heating is not possible.	Other: 355 (Climate Action Leicester and Leicestershire & Friends of the Earth)	The policy has been informed by evidence commissioned for this purpose, Document EB/CC/1 Energy and Sustainable Design and Construction study (2022). Supporting text for the policy (para. 6.14) encourages the use of heat pumps.
Policy CCFR05 - Delivering Renewable and Low Carbon Energy Projects		
In support	Other: 63 (Diane Bowers of Turley on Behalf of De Montfort University (Steven Hatherley))	Welcomed.

The wording of this policy isn't quite clear and therefore is unlikely to be effective. Is it that schemes wouldn't be supportive development results in a 'negative' impact on any	Other: 331(Cllr David Bill, Hinckley and Bosworth Borough Council)	The points made are noted. Re-wording of the policy will be considered in order to improve clarity.
of the criteria? And is it an 'and,' 'or,' or 'and/or' list. Point (d) could also sit separate to the listed criteria.	Statutory Consultee: 333 (Hinckley & Bosworth Borough Council)	
Policy CCFR06 - Managing Flood Risk and Sustainable Drainage Systems (SuDS)		
In support	63 (Local resident)	Welcomed.
In support	328 (Severn Trent Water)	Welcomed.
Recommend that policy details the drainage hierarchy covered in para 6.28 to provide clarity re expectation from new development re discharge of surface water flows within policy.	Other: 328 (Severn Trent Water)	It is considered that the supporting text is the appropriate place to include details of the drainage hierarchy as supporting text is where additional information on the policy is provided.
New surface water connections to foul sewers should be avoided as Severn Trent looking at separating surface water and sewerage within Wanlip Wastewater Treatment Works Catchment.	Other: 328 (Severn Trent Water)	The policy expects all development to provide SuDS, which will avoid new surface water connections to foul sewers.
General Policy Guidance Suggestions: <b> <b>     "Drainage Hierarchy Policy</b> </b>	Other: 328 (Severn Trent Water)	The City Council believes that the Local Plan and its policies are aligned with these general policy guidance suggestions.
New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where		<b>Drainage Hierarchy Policy</b> Local Plan para. 6.28 states that surface water should be discharged higher up the drainage hierarchy.
possible.		Sustainable Drainage Systems (SuDS) Policy
Supporting Text: Planning Practice Guidance Paragraph 80 (Reference ID: 7-080- 20150323) states: 'Generally the aim should be to discharge		Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) expects SuDS to be included in all development and requires demonstration that the proposed SuDS will be

surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

1. into the ground (infiltration);

2. to a surface water body;

3. to a surface water sewer, highway drain, or another drainage system;

4. to a combined sewer."

#### "Sustainable Drainage Systems (SuDS) Policy

All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are included, unless proved to be inappropriate.

All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity.

Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.

Supporting Text:

Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads." managed and maintained throughout the lifetime of the development.

#### Protection of Water Resources Policy

Para. 6.29 addresses the potential adverse impacts new development may have on the quality of aquatic ecosystems.

#### Water Efficiency Policy

Policy CCFR01. Sustainable Design and Construction requires all new residential development to meet the Optional Standard of 'Part G' of the Building Regulations 2013 (or equivalent future legislation) which is a maximum of 110 litres per person per day, and all new non-domestic development to meet the maximum credits available under BREEAM Wat 01 or an equivalent best practice standard.

#### "Protection of Water Resources Policy

New developments must demonstrate that they will not result in adverse impacts on the quality of waterbodies, groundwater and surface water, will not prevent waterbodies and groundwater from achieving a good status in the future and contribute positively to the environment and ecology. Where development has the potential to directly or indirectly pollute groundwater, a groundwater risk assessment will be needed to support a planning application.

#### Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 163 states: 'Planning policies and decisions should contribute to and enhance the natural and local environment...e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability. Development should wherever possible, help to improve local environmental conditions such as river basin management plans;'

### **"Water Efficiency Policy**

New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.

### Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 149 states: 'Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-

term implications for flood risk, costal change, water supply,
biodiversity and landscapes, and the risk of overheating from
rising temperatures. Policies should support appropriate
measures to ensure the future resilience of communities and
infrastructure to climate change impacts, such as providing
space for physical protection measures, or making provision for
the possible future relocation of vulnerable development and
infrastructure.'
This need for lower water consumption standards for new
developments is supported by Government. In December

developments is supported by Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long term national target. The National Infrastructure Commission (NIC) has already presented a report including recommendations for an average PCC of 118 l/p/d. In Wales, the 110 l/p/d design standard was made mandatory in November 2018. In 2021 the Environment Agency classed the Severn Trent region as Seriously Water Stressed – link. We recommend that all new developments consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.
- Hand wash basin taps with low flow rates of 4 litres per minute or less.

Water butts for external use in properties with gardens."

# Chapter 7 – Health and Wellbeing

Comments from: 267 (Leicestershire County Council), 268 (NHS Leicester, Leicestershire & Rutland Integrated Care Board (ICB)), 282 (Harborough District Council), 351

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response
Request that the Joint Health and Wellbeing Strategy and Action Plan 2019 is cited. We would suggest it would be beneficial to make reference to Leicester's Care, Health and Wellbeing Strategy 2022-2027.	268 (NHS Leicester, Leicestershire & Rutland Integrated Care Board (ICB))	The Joint Health and Wellbeing Strategy and Action Plan 2019 is cited in paragraphs 1.11, 7.1 and 16.1. The Council will include reference to Leicester's Care, Health and Wellbeing Strategy 2022-2027 in future plan review.
Whilst it is acknowledged that a Public Health Impact Assessment (PHIA) has been undertaken as part of public consultation on the plan, it is disappointing that stakeholder engagement on the HIA itself was not undertaken.	267 (Leicestershire County Council)	All of the evidence was made available during the Regulation 19 consultation. Unfortunately, as we consulted on Regulation 18 during Covid lockdown, we were unable to undertake stakeholder consultation as key stakeholders were unable to partake in this. This was due to other priorities around Covid.
Plan would result in worsened air quality; council should outline proposals for future plans to mitigate risk to public health from poor air quality.	351 (Claudia Webbe MP)	The Local Plan (Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)) contains the following policies which will help to improve the city's air quality: HW01. A Healthy and Active City, OSSR01. Green Wedges, NE02. Biodiversity Gain, NE03. Green and Blue Infrastructure, NE04. Ancient Woodland, Veteran Trees, and Irreplaceable Habitats, T01. Sustainable Transport Network, and T02. Climate Change and Air Quality. It also contains the following policies which will mitigate the impacts of new development on air quality: CCFR01. Sustainable Design and Construction, CCFR02. Whole Life-Cycle Carbon Emissions, CCFR04. Low Carbon Heating and Cooling, DQP01. Design

		Principles, DQP02. Tall Development, and OSSR03. Open Space in New Development.
Paras 7.15 and 7.16 are duplicates.	267 (Leicestershire County Council), 282 (Harborough District Council)	This is accepted and has been included in the list of minor modifications.
Para 7.15 - text which states, "Where development sites are near administrative boundaries the HIA will need to consider appropriate cross boundary issues," the specifics of this could be expanded, to include Health Impact Assessments being shared with the Public Health team for that particular authority.	267 (Leicestershire County Council)	The Council will consult any neighbouring authorities as part of planning applications coming forward.
Para 7.15 - Health Impact Assessments for development sites near administrative boundaries will need to consider appropriate cross boundary issues is a welcome addition.	282 (Harborough District Council)	Support welcomed
Policy HW01 - A Healthy and Active City		
Point f) could be expanded to reference links to those travelling in and out of the city. The transport evidence base is very strong around links to air quality, perhaps stronger than tree planting. This travel consideration would enable us to work jointly around travel methods for our communities impacting on the city and vice versa.	267 (Leicestershire County Council)	Will be considered.
Parts of Policy HW01 (A Healthy and Active City) with the reference 7.13 and 7.14 are part of the explanation to the following policy (HW02) and do not belong in the policy.	282 (Harborough District Council)	This is accepted and has been included in the list of minor modifications.
Policy HW02 - Health Impact Assessments (HIA)		
The presence of Policy HW02 (Health Impact Assessments) is positive and will complement the work in the County of Leicestershire.	267 (Leicestershire County Council)	Comment welcomed.

# Chapter 8 – Delivering Design Quality

Comments from: 42, 63, 80, 82, 261, 267 (Leicestershire County Council), 282 (Harborough District Council), 287, 294 (Avison Young on behalf of National Grid), 316, 328 (Severn Trent Water), 331, 355, 496

Main Issues Raised	Rep ID (name of Statutory	Council Response
	Consultee if applicable)	
Para 8.13 – The Tall Development in Leicester Evidence Base Document should be refined further and used to evidence the new Tall Buildings SPD.	261 Marrons on behalf of Charles Street Buildings	Council is committed to a tall development SPD/Supplementary Plan on adoption of plan, current text in the plan reflects this. There will be further opportunities to make representations on said SPD/Supplementary Plan.
Para 8.14 – Refine text to introduce more flexibility.	261 Marrons on behalf of Charles Street Buildings	The Council believes that wording is flexible enough.
Policy DQP01 - Design Principles		
Policy should refer to the need for a cohesive approach to providing new route networks within developments that cross boundaries.	267 (Leicestershire County Council)	Council notes the comments made.
Policy would have the potential to unreasonably constrain development.	287 RPS Consulting Services Limited on behalf of Highcross shopping centre	This would be in line with National Design Guidance
Add an additional criteria to DQP01:- Suggested wording "Take a comprehensive and co-ordinated approach to development, including respecting existing site constraints and utilities situated within sites."	294 Avison Young on behalf of National Grid	Council would consider making modification following further clarification around wording.
The use of Building for a Healthy Life should remain voluntary rather than becoming a mandatory policy requirement.	316 Home Builders Federation	Council feels that this needs to be a policy requirement and is directly referenced within the NPPF.

Increase density from 2 to 3 storey houses, particularly in urban area.	42 Local Resident	Densities included in policy are minimum
Policy DQP02 - Tall Development		
In support	80 Turleys on behalf of Leicester City Football Club	Support Welcomed
In support	282 (Harborough District Council)	Support Welcomed
Approach outlined in the policy is overly restrictive.	287 RPS Consulting Services Limited on behalf of Highcross Shopping Centre	Council does not believe that policy and supporting text is overly restrictive and feels that the proposed modification would pre-empt any SPD/Supplementary Plan.
Policy should identify circumstances where tall buildings can be supported outside tall building zones.	82 Quod on behalf of Graeme Reod from London and Scottish Property Investment Management	Council does not see this as an appropriate approach, policy is flexible enough to allow applications for tall buildings outside of the areas identified.
Policy should direct tall buildings to tall building zones.	82 Quod on behalf of Graeme Reod from London and Scottish Property Investment Management	Council does not see this as an appropriate approach
Change of wording from positive focus to negative.	261 Marrons on behalf of Charles Street Buildings	Council believes that policy is written in a way that provides adequate balance and is positively prepared.
Policy should take into account lack of shading on the upper floors of tall buildings.	355 Climate Action Leicester and Leicestershire & Friends of the Earth	The Council believes that this is matter for building regulations rather than planning policy but would consider modification if evidence if provided showing

		this a problem in the Leicester context.
Please note potential impact on implementation of policy on meeting Leicester City housing needs.	331 Cllr. David Bill of Hinckley and Bosworth BC	
Policy DQP03 - Inclusive Design		
The requirements of this policy do not allow an applicant to understand what is required of them.	316 Home Builders Federation	Council considers this is clear but would be willing to make further clarifications via modifications if this would help this matter.
Policy DQP04 - Landscape Design		
In support	Other: 328 (Severn Trent Water)	Welcomed
Recommend policy to include detail of surface water outfall from site / drainage hierarchy at layout stage.	Other: 328 (Severn Trent Water)	Will be considered in policy CCFR06
Policy should be amended to require street planting throughout the city.	355 Climate Action Leicester and Leicestershire & Friends of the Earth	Council tries to encourage tree planting on all new developments and in light of the NPPFs requirements around street trees the council does not believe further modifications are required to this policy.
Policy DQP05 - Backland, Tandem and Infill development		
Policy appears to be a presumption in favour of back land development.	496 Stoneygate Conservation Area Society	Council believes that policy gives clear steer where back and development would or would not be appropriate
Policy DQP06 - Residential Amenity		

In support	63 Turleys on behalf of De Montfort University	Welcomed
Policy DQP07 - Recycling and Refuse Storage		
-No Comments-		
Policy DQP08 - Shopfronts and Security		
-No Comments-		
Policy DQP09 - Signs and Banners Advertisement Design and Location		
-No Comments-		
Policy DQP10 - Advertisement Hoardings		
-No Comments-		
Policy DQP11 - Changing Places Facilities		
-No Comments-		

### Chapter 9 – Central Development Area

Comments from: 42, 63 (Turley on behalf of De Montfort University), 80 (Turley on behalf of Leicester City Football Club), 261 (Marrons on behalf of Charles Street Buildings), 267 (Leicestershire County Council), 278 (Howes Percival LLP on behalf of Code Students Ltd), 288(Montagu Evans on behalf of University of Leicester), 292 (Avison Young on behalf of the Hornbeam Partnership), 320 (Portal Ltd, 328 (Severn Trent Water), 331 (Cllr David Bill from Hinckley & Bosworth Borough Council), 333 (Hinckley & Bosworth Borough Council)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response
Welcome the opportunity to work with the council on the SPD.	63 (Turley on behalf of De Montfort University)	The Council welcomes the opportunity to work with De Montfort University on Supplementary Plans.
Para 9.20 - Further explanation is required to explain what the Council means in the context of the 'agent of change' principle and how the Council propose to assess proposals and determine whether mitigation is required.	63 (Turley on behalf of De Montfort University)	Agent of change is set out adequately within the NPPF (2021) para 187.
Focus on creating a Central Development Area is welcomed and the objectives listed are supported.	267 (Leicestershire County Council)	The Council welcomes the County Council support and continuous cross boundary working.
Policy CDA01: Central Development and Management Strategy		
Welcomes continued support for university related projects and masterplans as set out in this policy.	63 (Turley on behalf of De Montfort University)	Welcomed
Support for the overarching aims of the policy, however the benefits should not be limited to existing and future residents and should be expanded to all who experience the CDA. People who work, learn and visit Leicester are recognised in the policy. This would be consistent with the remainder of the policy. Amendment to para 1 of the policy to read 'The Central Development Area (CDA) will be the focus of major housing development, employment, and physical regeneration to provide the impetus for economic, environmental, and social investment and provide benefits for existing and future residents, and those who work, visit and learn within the city.'	288 (Montagu Evans on behalf of University of Leicester)	The Council welcomes the support. The policy is intended to benefit all who use the CDA and welcomes additional phrasing of the policy. Minor modification to amend policy wording in paragraph 1 in line with suggested wording.

The findings of the Tall Building evidence document contradict the objectives of the CDA01 policy with regard to the Waterside Regeneration Area, as any wide scale limit upon building heights reduces the effectiveness and deliverability of masterplan led schemes. Within the CDA, Policy CDA01 states that development will be required to "protect and enhance designated and other heritage assets". It is implied therefore that any level of harm to a heritage asset, even if minor and falling well below the threshold of "substantial harm" as set out at paragraph 200 of the NPPF, will result in a proposed development being refused, irrespective of whether the harm arising is less than substantial and the public benefits outweigh the harm (para. 201). Suggested mod to criteria around heritage led regeneration to include 'If less than substantial harm to an asset is identified this will be weighed against the public benefits of the proposal'	261 (Marrons on behalf of Charles Street Buildings)	Council believes that policy is robust and complies with the NPPF. The Tall Buildings evidence document has been formed by detailed analysis and assessments which the Council believe is appropriate for the city of Leicester.
It would be expected that the justification and implementation should accompany each policy. The Policies Map/inset maps could be expected to provide an indication of more active intervention. Appendix 4 lists those areas where CPOs are part of the delivery mechanisms. Compulsory purchase does not appear in the main body of the document. Table 7 should align with Appendix 4.	331 (Cllr David Bill from Hinckley & Bosworth Borough Council) & 333 (Hinckley & Bosworth Borough Council)	As mentioned in the Local plan further details on the delivery, implementation and intervention will be contained within the Supplementary Planning Documents/Supplementary Plans that will be produced after the Plan is adopted. A more detailed layer of plans will be contained within the SPD/Supplementary Plans No change required to the plan, but supplementary guidance will be developed for each of the character areas.
Policy CDA02: New Development Within the Character Areas		
Wording of 2 <sup>nd</sup> and 3 <sup>rd</sup> bullet points not consistent with statutory duties of Planning (Listed Buildings and Conservation Areas) Act	63 (Turley on behalf of De Montfort University)	The Council considers that the policy, as is, adequately considers the NPPF and statutory

<ul> <li>1990 or the heritage policies of the NPPF. Recommended that bullet points are amended to state the following:</li> <li>The significance of Designated heritage assets, and their settings will be conserved or enhanced. Any harm to, or loss of, the significance of a designated heritage asset should require clear and convincing justification."</li> <li>"The significance of non-designated heritage assets should be conserved where possible, including any positive contribution they make to the townscape."</li> </ul>		duties of planning Listed Buildings and Conservation Areas) Act 1990.
Policy CHA01: The Railway Station		
Developing employment at the Railway station. For over 20 years, I have suggested that a large scale commercial development should be built on top of(and not to the side of) the railway station. We have a huge chunk of open air space which should be used. (Keep the historic frontage of course).	42 (Local resident)	The railway station is currently subject to a planning application <b>20231214</b> .
Leicester currently has a limited supply of available Grade A offices in the city centre. In order to remain competitive against other similar sized cities, Leicester needs to be providing high quality, flexible office space that adheres to high sustainability standards that are increasingly becoming a major factor in a company's location choice. The location of new offices around Leicester Railway Station is welcomed	267 (Leicestershire County Council	Support noted and welcomed.
As neighbours of the railway station, we need to understand the risks posed by the development to access to our workplace, buried utilities, dust and air contamination caused by demolition and construction, parking and deliveries. We would want to be included in all communications regarding project timelines and have visibility of drawings and plans.	320 (Portal Ltd)	The railway station is currently subject to a planning application <b>20231214</b> , as part of this process landowners and neighbours will be consulted on the plans and the support documents. The Council has also carried out substantial consultation on the plan including residents and commercial properties in the city centre.

Where developing office space it is recommended that rainwater harvesting is considered and where appropriate utilised ensure that the new offices are developed sustainably and minimise potable water consumption where possible.	328 (Severn Trent Water)	The Council will consider including supporting text in the employment section (chapter 12) of the plan
Policy CHA02: Mansfield Street		
<ul> <li>The partnership looks to bring forward 100 Church Gate for residential development with its limited use for retail development. The Partnership supports the regeneration of the Central Development Area with high density new homes to meet housing needs. However, has concerns over flexibility of uses and safeguarding of the pedestrian routes. This does not have proper justification and analysis and would affect the viability and deliverability of the site.</li> <li>Modifications to this policy, and the evidence base which sits behind it, should be made based around the following matters: <ul> <li>greater flexibility built into this policy to allow sites within the central shopping area to be brought out of retail use should there be justified reasons for doing so, to promote vitality and viability; and</li> <li>removal of the pedestrian connection shown east to west through the centre of the 100 Church Gate site.</li> </ul> </li> <li>Keen to engage with the City Council further regarding the site at 100 Church Gate and will be pleased to discuss proposals for the redevelopment of this site with officers in due course.</li> </ul>	292 (Avison Young on behalf of the Hornbeam Partnership)	All character areas have been built on detailed analysis and supporting evidence, which the policies have been built on. This involves a comprehensive assessment of the CDA. The policies are shaped by and built on the individual character area assessments which sets out the vision for these areas. It should be noted that after the Local Plan is adopted, the Council will produce SPD/Supplementary Plan's with more detailed plans which will be consulted on as part of the process.
Policy CHA03: St. Margaret's		
The redevelopment of brownfield sites within this area represents a good opportunity to re-connect with the watercourses including the sustainable discharge of surface water. This re-connection to the watercourse/waterways should be prioritised and sustainable drainage incorporated.	328 (Severn Trent Water)	Any development would need to be considered in line with other policies in the Local Plan including those relating Drainage policies and Flooding (CCFR06).

It is high time that this area was brought more into the city's wider area. Hopes it can be turned into an attractive and beneficial offering. The plans you are suggesting here need full support	42 (Local resident)	Support noted and welcomed
Policy CHA04: Wharf Street		
Where redeveloping and reconfiguring lee Circle Car park, SuDs opportunities should be prioritised especially where these incorporate the including of green infrastructure, promoting wildlife and flood resilience, improving the street scheme and creating more welcoming routes from the carpark into the city centre.	328 (Severn Trent Water)	Any development would need to be considered in line with other policies in the Local Plan including those relating Drainage, biodiversity, landscaping and flood resilience policies (e.g., CCFR06).
Policy CHA05: Belgrave Gateway		
-No Comments-		
Policy CHA06: Leicester Royal Infirmary and De Montfort University		
DMU would like further clarification on how developments will be expected to enhance connectivity across the area; for example, does this relate to all development? This may not be feasible or viable for e.g., a proposed change of use of one building. In order to be considered 'sound' and specifically 'justified,' additional information is required as to how improved connectivity will be sought. DMU would also highlight to the Council that the boundary currently shown in the Townscape Analysis and Design Guidance Plan does not accurately represent the University campus as of 2023. accordingly.	63 (Turley on behalf of De Montfort University)	All character areas have been built on detailed analysis and supporting evidence, which the policies have been built on. This involves a comprehensive assessment of the CDA. The policies are shaped by and built on the individual character area assessments which sets out the vision for these areas. It should be noted that after the Local Plan is adopted, the Council will produce SPD/Supplementary Plans with more detailed plans which will be consulted on as part of the process.
LRI accessibility leaves a lot to be desired. It has turned its back on bus access and even pedestrians. The main access is a warren of tortuous paths and turnings. Even when you get inside a building, to find the main Reception is a challenge. A lot has to be done here and more than just the simple words here.	42 (Local resident)	The Plan does not specifically go into detail about access to and from the LRI. However, connectivity that and other areas will be looked at though more detailed guidance in the SPD/ Supplementary Plans. In terms of specific design of building design and access,

		the Plan contains design policies (DQP01 and DQP03) that address the issues raised.
Policy CHA07: St. George's Cultural Quarter		
Policy is welcomed in terms of the ability to promote opportunities for creative workspaces. Further reference to the positive impact on health and wellbeing of cultural activity could be included, as could reference to providing creative workspace opportunities in empty properties.	267 (Leicestershire County Council)	Support is noted and welcomed. The Council believes that this is sufficiently referenced in the health and wellbeing chapter (Chapter 7)
Recommend that the redevelopment considers incorporating rainwater harvesting to support the sustainable use of water. Where public Realm improvements are proposed the incorporation of SuDS should be detailed to ensure that opportunities to enhance public spaces are investigated and pursued where appropriate.	328 (Severn Trent Water)	Any development would need to be considered in line with other policies in the Local Plan including those relating Drainage, landscaping and public space enhancement policies (e.g. CCFR06, DQP04).
Policy CHA08: Old Town		
Supportive of policy but states that it could be difficult to achieve. Suggestion to get a competition going between architect firms, student architects and involve some of the inhabitants of the area too.	42 (Local resident)	Support noted and welcomed. Council will consider involving local architects and the universities in the development of these areas through these SPD/ Supplementary Plans and would welcome their input.
Policy CHA09: New Walk		
Consider the criteria for conservation led development set out in the policy to be too limiting in focusing solely on vacant land. Subject to meeting other policies within the development plan, residential and student accommodation should also be promoted on all forms of brownfield land, whether these are vacant plots or surplus existing buildings. The New Walk Character Area Objectives refers to delivering small scale incremental development including 'backland development,' but also upwards extensions. Existing buildings and previously developed sites offer useful source of potential land for alternative	288 (Montagu Evans on behalf of University of Leicester)	Key strategy of the Plan is to utilise brownfield sites and encourage conversion and extension of existing buildings subject to the usual planning considerations. Given the nature of New Walk i.e Leicester's Georgian legacy, we would expect all new build and conversions to respect the character of the area and do not adversely affect residential amenity. In view of this, the key objectives in this area

residential or student accommodation use. Other parts of this policy and others ensure that such development would protect and enhance heritage assets and create a high-quality living and working environment, such that the following distinction could be included in the policy.		provides a balanced approach to development in this unique character area.
DMU welcome the opportunity for educational uses, and student accommodation to be supported within the New Walk Character Area, however, the Policy cannot be considered 'sound' as it is not clear as to whether student accommodation would be welcomed through the conversion of existing buildings (as opposed to only vacant plots which is currently specified). At present, the Policy doesn't provide an appropriate strategy and therefore cannot be considered 'justified.'	63 (Turley on behalf of De Montfort University)	The Council will consider providing further clarification through supporting text.
The policy should be amended to provide clarity as to whether student accommodation would be welcomed through the conversion of existing buildings.		
Policy ORA01: Abbey Meadows and Pioneer Park		
The development of Pioneer Park over the last 10 to 20 years has been an excellent achievement by the City and the University. It must continue as an excellent way of achieving multi/high skilled employment opportunities!	42 (Local resident)	Noted and support welcomed
Policy ORA02: Waterside		
We consider the allocation of the majority of the Objectively Assessed Need, (40,000sqm.) for office space, to just two city centre sites to be a flawed approach for a number of reasons.	261 (Marrons on behalf of Charles Street Builders)	Policy is flexible for additional provision within the Central Development Area. This is addressed under Policy SL01.
<ul> <li>This is an unnecessarily inflexible approach which thwarts growth and does not comply with the Council's strategic aim of supporting business growth or the NPPF.</li> <li>It places emphasis on two sites which have potential viability and deliverability issues as identified in the HENA.</li> </ul>		

<ul> <li>It fails to recognise the potential of our client's central viaduct site (identified within the HENA along with other Waterside sites as being "pipeline" sites for office development).</li> <li>Concerns relating to the deliverability and viability of the two office allocations. We note within the HENA at table 28 that a number of constraints are picked up which may be impeded on the deliverability of these sites. We do not consider that they will bring forward the office growth envisaged within the plan period.</li> <li>The HENA recognises the value of other sites within the city centre including at Waterside and the Central Viaduct. The Draft Plan ignores the contribution these sites would make and in presenting office demand as met at 12.14 along with seemingly setting a test for "defined need" within ORA02 thwarts the delivery of office development outside of the two allocated sites.</li> <li>Suggests deleting "where there is a defined need," in second bullet of ORA02.</li> </ul>		
Policy ORA03: University of Leicester		
Support for draft policy and extent of map. This policy enables the University to meet the needs of its students and staff through the support of the University's masterplan, as well as related infrastructure that are equally important, including the need for improvements to sustainable travel opportunities, including cycling and walking.	288 (Montagu Evans on behalf of University of Leicester)	Support noted and welcomed.
Policy ORA03 (and to the extent CDA01 relates to ORA3) is not considered to currently represent an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence as it fails to take the opportunity to ensure student development is delivered at the most appropriate sites in the city. It also fails to enable complimentary employment uses to be delivered within ORA3. Its failings could be addressed by extending the area of the designation to encompass more land to	278 (Howes Percival LLP on behalf of Code Students Ltd)	Plan has defined criteria for new student development. This is the most appropriate area for development of student accommodation to encourage sustainable travel and access to facilities. There is clear guidance on this within the Ho08 policy and the support text, which policy ORA03 cross references to. All applications would be

<ul> <li>the west of the draft designation. It should be worded to support complimentary employment uses within the area.</li> <li>Suggestion for an alternative site by the developer which could form one of the designated Neighbourhood Employment Areas in accordance with Policy E05 where housing (including student housing) could come forward where it can be clearly demonstrated that existing constraints can be mitigated, and it is not expected to result in any detrimental effect on the operation of the surrounding businesses. This would enable suitable residential development to come forward at a sustainable location whilst protecting the surrounding existing businesses.</li> <li>The wording of the policy should be amended by the inclusion of an additional bullet point stating: <ul> <li>Allowing employment uses that are not detrimentally to the role of the university as an important higher educational facility This would ensure that suitable employment development could be brought forward in ORA03.</li> </ul> </li> </ul>		considered against amenity of local residents (Design chapter – DQP06) Any new sites will be considered as part of the SHELAA update where its potential use will be assessed as part of the assessment. The Plan has policies for both new employment and agent of change. Leicester also has a shortage of employment land and allowing other uses such as student accommodation would undermine plan objectives.
Policy ORA04: Leicester City Football Club (LCFC)		
Policy restricts the proposed residential uses to be delivered within the LCFC Regeneration Area to 'Use Class C3', which does not reflect the range of housing tenures which could potentially be delivered at the site as considered within the hybrid planning application, including purpose-built student accommodation ('PBSA'), build to rent ('BTR') and market sale housing. The residential component of the scheme is in 'outline' and therefore the precise tenure mix will be determined at reserved matters stage in accordance with the terms of the Section 106 Agreement. Policy does not provide sufficient flexibility to deliver a non-C3 residential development and is therefore inconsistent with the resolution to grant hybrid planning	80 (Turley on behalf of Leicester City Football Club)	Policy adds significant flexibility to this area but also ensures that the area will meet its plan objectives.

permission. It is also in conflict with the terms of Draft Policy Ho03 which promotes a mix of house types, tenures and sizes.	
As the policy does not provide adequate flexibility, it therefore risks being ineffective, not positively prepared and inconsistent with the Framework. In such circumstances the Plan would be unsound and therefore LCFC requests that Draft Policy ORA04 is amended to enable a broader mix of residential uses to be delivered at the King Power site.	
LCFC have acquired the former EON site, which immediately adjoins their existing landholding and the land which is identified as the LCFC Regeneration Area under Draft Policy ORA04. The Club considers that this land would be best served as an inclusion of the LCFC Regeneration Area, enabling it to be considered for a broader range of potential uses associated with the wider Masterplan and complementing the hybrid planning permission. This land presents a logical extension of and is better related to the LCFC Regeneration Area than to the Walnut Street Regeneration Area.	
On this basis, Suggestion from LCFC to amend the wording amended as follows:	
Within the area defined as 'Leicester City Football club' on the adopted policies map, development will be expected to support the continued development of the football stadium and associated facilities. This will be achieved by:	
<ul> <li>Supporting the expansion and enhancement to the King Power (LCFC) Stadium</li> <li>Supporting proposals for ancillary development such as hotels, offices and other developments which are normally found at and around sporting stadia (including retail and food &amp; beverage related uses)</li> <li>Supporting proposals for leisure related development, including a multi-purpose arena capable of hosting a range of events</li> </ul>	

<ul> <li>Delivery of residential uses, including homes of a range of tenures, types and sizes in accordance with Policy Ho03, where it does not undermine the proposals for the expansion and enhancement of the stadium. This may include purpose-built student accommodation (in accordance with Policy Ho08).</li> </ul>	
Policy ORA05: Walnut Street -No Comments-	

# Chapter 10 – Heritage

### Comments from: 42, 300 (Historic England), 351 (Claudia Webbe MP), 496 (Stoneygate Conservation area Society)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response
Would like policies to be combined, as archaeology is part of the Historic Environment.	300 (Historic England)	The Council recognises that archaeology is part of the Historic Environment and would consider this as a modification.
No mentions within the Plan of the possibility that heritage assets and buildings like this can be refurbished and reconditioned to bring them up to a good standard, as well as protecting historical status.	351 (Claudia Webbe MP)	This is mentioned within policy HE01 of the plan, which should be read alongside design policies to ensure that the development is sympathetic to the listed buildings and surrounding areas.
Para 10.4 – Prohibit expensive to make heritage building energy efficient in New Walk conservation area and to meet requirements.	42 (Local resident)	Para. 6.9 of the Local Plan (Document SD/2 Leicester Local Plan 2020-2036 Submission (Regulation 19 publication) Plan (January 2023)) emphasises the role that retrofitting measures can play in reducing the city's carbon emissions and overall energy consumption. However, the benefits of retrofitting an existing building must be viewed in the context of the whole of the Local Plan. In the representor's example, any proposal for retrofit would have to be assessed against the criteria of Local Plan Policy DQP01. Design Principles, Policy CHA09. New Walk, and Policy HE01. The Historic Environment.
Policy HE01 – The Historic Environment		

Policy now reads 'conserve and enhance' in line with NPPF terminology which is welcomed. Policy doesn't address the consideration of harm in respect of public benefit. Warmly welcome the explicit reference to the importance of street patterns, size, design and scale and building materials and views in determining the suitability of a development and we especially applaud the stricter criteria for demolition in CAs.	300 (Historic England) 496 (Stoneygate Conservation area Society)	Noted and support for terminology change welcomed. Consideration will be given to including this as part of modifications to the plan. Support noted and welcomed. The Stoneygate Character Appraisal is not a document produced to support the Local Plan.
The Stoneygate Character Appraisal's description of the Conservation Area is based on `townscape' rather than `streetscape' and doesn't make the shared qualities of the houses in streets like Southernhay Road (which were built at roughly the same time) sufficiently clear.		
Policy HE02 - Archaeology		
Policy should address the consideration of harm in respect of public benefit. Should also refer to the need for Scheduled Monument Consent in the supporting text for the avoidance of doubt and outline that in some cases substantive investigations may be required ahead of submitting an application. This would ensure that aspirations for the historic environment are clear ahead of schemes being submitted for consideration.	300 (Historic England)	The Council will consider this as a modification to the plan.

# Chapter 11 – Culture and Tourism

Comments from: 3 (Belgrave allotment society), 42, 66 (Theatres Trust), 80 (Turley on behalf of Leicester city Football Club), 85, 140, 245 (Cllr Roy Denney of Blaby District Council), 267 (Leicestershire County Council), 300 (Historic England), 331, 333 (Hinckley & Bosworth Borough Council)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response
<ul> <li>To meet the needs of diverse and growing communities, there is a need to reflect the following key considerations in the plan:</li> <li>Adequate provision for a new cemetery with adequate burial spaces to meet the growing demand as well as the continuation out of hours burial services.</li> <li>Provision for Places of Worship, including madrassas and social spaces right across the city as our community is no longer concentrated in only one part of the city as has historically been the case.</li> <li>A proactive and inclusive approach to planning and development which counters the notion of "areas belonging to certain communities"</li> <li>New developments must provide adequate housing that is of a decent standard and with access to playing fields, community centres and other recreational facilities.</li> <li>D1 use floor space allocation and growth should be in line with housing growth (increased populations require supporting community infrastructure).</li> <li>Educational and health facilities, including schools and doctors surgeries to meet the needs of the local population without people having to travel long distances which would be both costly and harmful to the environment.</li> <li>Sufficient parking, good electric vehicle infrastructure and access to good and reliable bus services.</li> <li>New developments of any description across the city must be accessible to those who are less able.</li> </ul>	140 (Local resident)	Cemetery provision is included within paras 11.19 and 11.20 of the Plan and covered in Open Space chapter (Chapter 14). New cemetery spaces will be decided on a case-by- case basis, and dependent on demand. Provision of new places of worship covered in policy CT05. All new development is expected to be well designed in accordance with design policies (Chapter 8). Infrastructure needs will need to comply with policy DI01 in any new development. The Plan aims to benefit all groups within society. An Equality Impact Assessment has been carried out and deemed SD/5 (Equality Impact Assessment (EIA): Leicester Local Plan (2020-2036) (2022)).

<ul> <li>Adequate Street lighting and clean neighbourhoods to ensure people feel safe when accessing their local area.</li> <li>Support for Faith Schools to ensure parents have a choice in how their children's educational needs are met.</li> <li>Investment and opportunities that create employment and aspirations for young people.</li> <li>Investment in infrastructure to tackle fuel poverty and the rising cost of living.</li> </ul>		
The Leicester Local Plan 2020 - 2036 must comply with the principle that there should not be the loss, reduction or displacement of community facilities, sites or provision that negatively impacts on the health and well-being and the safety of any community in the city.		
Para 11.19 – Suggestion of an extra clause "Where former places of worship are disused and not commercially viable for alternate usage the Council will seek to acquire them and, either by alteration or redevelopment, utilise them for either social housing or business starter-units"	245 (Cllr Roy Denney of Blaby District Council)	Redevelopment of places of worship is covered in para 11.15 of the supporting text for the policy. The Council does not wish to include a statement of this nature as each unit would be taken on a case by case basis.
Suggestion to include a line in para 11.20 – e.g. Glenfield which has no facilities to bury its dead and a joint facility could be developed on part of the former Western Park Golf Course.	245 (Cllr Roy Denney of Blaby District Council)	Burial facilities will be considered in all available locations across the city based on the identified need. At this stage, there is no identified need for a burial facility on the Former Western Park Golf Course site. Therefore, the Council would not support this modification at this time to allow for the whole of the city to be considered before a decision is made on the location. As Glenfield is within Blaby District Council, the Council would expect that discussions would be made with Blaby over this.
Policy CT01 - Culture, Leisure and Tourism		

In support of any policies that seek to support culture, leisure and tourism, including this policy. Club notes and welcomes reference to contribution LCFC provides to attracting visitors and boosting tourism.	80 (Turley on behalf of Leicester city Football Club)	Support noted and welcomed. The Council will continue to engage with the football club on this site and planning applications submitted.
This policy is sound in terms of supporting new cultural facilities. However, it is also important that these uses are protected from unnecessary loss, in line with paragraph 93 of the NPPF (2021). Presently the Plan appears to be silent on this matter, with protection policy only applying to pubs. Therefore, there is a risk of Leicester's valued cultural venues including its theatres, music venues and cinemas being unnecessarily lost. This would be detrimental to the communities that use them, undermining social and cultural well-being. We suggest additional policy is added perhaps as a part 2 to CT01 echoing Policy CT03.	66 (Theatres Trust)	The Council would consider a modification on this matter in line with the NPPF.
Suggested that text for point b) is amended to include ' :and where possible encourage the use of electric vehicles and provide access for those who need a private vehicle where sustainable modes of transport can't be met	267 (Leicestershire County Council)	The Council feels that this has been sufficiently covered as part of building regulations and is also covered within chapter 16 of the Local Plan, particularly policy TO2 "Climate Change and Air Quality".
Policy CT02 - Assets of Community Value		
Welcomes the Plan's support for the designation of further Assets of Community Value.	66 (Theatres Trust)	Support noted and welcomed.
The term 'is responsive to local need' is too vague to be included. Should be enhanced by saying c) creates a community hub, bringing people together.	245 (Cllr Roy Denney of Blaby District Council)	The Council believes that the wording as written allows for development to be situated in places that best suit the local population.
Criterion A of policy in conflict with Localism Act as it should not require services / facilities to be "open." Section 88, section 2, Test A and B of interests in 'recent past' can satisfy this statutory test.	331 (Cllr David Bill of Hinckley & Bosworth Borough Council), 333 (Hinckley &	The Council believes that there is some confusion with the word 'open' in this criterion. The Council believes that the removal of the word 'open' will not adversely impact the integrity of the policy and can be amended as part of a minor modification.

	Bosworth Borough Council)	
Policy CT03 - Protection of Public Houses (Class Sui Generis)		
Replace "or" between criteria (a) and (b) with "and" as 'or' seriously weakens the policy	85 (Local resident), 245 (Cllr Roy Denney of Blaby District Council)	The Council believes that the policy allows more flexibility for planning applications to be determined on a case by case basis.
Clause b) is too subjective and affords little protection.	245 (Cllr Roy Denney of Blaby District Council)	Some text could be added into the criterion to stipulate 'within reasonable waking distance' and named uses that would constitute a similar facility
A few too many Public Houses, and it may be wise to let some slip away more easily.	42 (Local resident)	It would be difficult to determine which public houses to be removed without the flexible approach outlined in the current policy.
Policy CT04 - Great Central Railway Museum		
In support overall but supporting text does not seem to elaborate on what will be required to be 'associated' or 'compatible' with the railway.	331 (Cllr David Bill of Hinckley & Bosworth Borough Council),	The uses 'associated' or 'compatible' would be decided at planning application level. Current policy allows for some flexibility of uses and allow for this to be built out in a sustainable way. However, the focus of the development will primarily be for leisure/tourism uses as per the CT04 policy and the SD/19 document 'Non-Strategic Sites Proposed for Allocation in the Draft Leicester Local Plan (2023)'.
Objections made to the site allocation under site 575. Please see below.	3 (Belgrave allotment society), 300 (Historic England)	See responses in site 575.
Policy CT05 - Provision of new and retention of existing Places of Worship		

-No Comments-		
---------------	--	--

# Chapter 12 – Employment

Comments from: 42, 136, 255, 261, 267 (Leicestershire County Council), 269, 278, 282 (Harborough District Council), 318, 319, 331, 333 (Hinckley & Bosworth Borough Council), 351, 353

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response
Support for proposed employment strategy that has been updated with EDNA 2020.	282 (Harborough District Council)	Support noted and welcomed.
Should reference reuse of derelict land for economic growth and employment purposes, for example in the Waterside Area	255 (councillor Sue Waddington)	Additional supporting text will be considered.
and on Woodgate.		The plan recognises the need to reuse to derelict/brownfield land, The government prioritises the reuse for housing, but this does not preclude the reuse for employment where appropriate. (Covered by paragraph 12.3 in the employment chapter)
Concerned that the Local Plan remains silent on the problems centring upon Leicester's garment factories and worker exploitation in the sector.	351(Claudia Webbe MP)	This is not a planning issue and is outside the scope of the Local Plan.
Leicester workers are paid less than the comparable figures (ONS) for both East Midlands and Nationally given that pay and conditions are a major factor affecting quality of life, this issue should be addressed as a priority and related development must address this issue		This is not a planning issue and is outside the scope of the Local Plan.
Imperial buildings (formerly Imperial Typewriters) houses several garment manufacturers and is in a poor state of repair. It is a Local Heritage Asset. It is essential that this and other		This building is in private ownership. The conservation team carry out

similar buildings are refurbished. I am disappointed that this has not been mentioned in the Local Plan.		annual "buildings at risk" surveys of heritage assets.
Is there an assessed need for another building for employment, when there has been demolition of units for local housing needs There is a development of housing over the Leicester boundary, would this build for employment, benefit these houses, or the local community in Leicester City.	136 (Local Resident)	Proportionate and up to date evidence has been used to inform requirement. (EDNA) (EB/EM/1) The land identified for employment is to meet the City's needs.
Leicester is experiencing an increasing supply of available secondary offices, primarily driven by companies adopting "New Ways of Working" principles. Before these properties are offered for alternative planning uses, property owners should comprehensively demonstrate there is no demand for secondary office market stock.	267 (Leicestershire County Council)	Recent changes to permitted development restricts the degree of control that the council can put on this. Policy states that the council will consider Article 4 directions if necessary but noting the high bar that any Article 4 direction on this matter would have to meet as per the NPPF.
Limited amount of land for distribution uses, the city should be encouraging larger land use enquiries to look for sites along the motorway corridor.	267 (Leicestershire County Council)	The Warehousing and Logistics in Leicester and Leicestershire: Managing growth and change Study meets the need outside the city, given our extremely limited land availability.
Owing to wider partnership on strategic warehousing, the Leicester City Local Plan should be more explicit about addressing the known need for strategic logistics and warehousing floorspace to 2041 identified in the 'Warehousing and Logistics in L&L: Managing Growth and Change' (April 2021) study. There should be specific reference to strategic logistics and warehousing within an existing and new policy in Chapter 12:	269 Turley on behalf of IM Properties Plc	The Warehousing and Logistics in Leicester and Leicestershire: Managing growth and change Study meets this need outside the city, given our extremely limited land availability.

Employment as well as explanatory text to explain the strategic employment land context.		Leicester & Leicestershire Strategic Distribution Apportionment Study is currently under preparation.
		The SOCG (SCG/4) agrees in principle that sufficient land will be provided outside of Leicester to meet the need identified.
The nature and location of the employment uses are best suited to business which can effectively operate alongside residential development.	318 Lichfields on behalf of CEG	This is an indicative plan only, with the main aim of illustrating where employment is provided throughout
The ability of the SUE to contribute towards meeting any unmet need in Charnwood will depend on the nature and scale of the requirements, commercial demand and market forces, therefore Thorpebury Employment Growth Area should be removed from Diagram 12, so that the employment space in the SUE can be designed and delivered with reasonable flexibility.		the HMA and does not allocate sites outside the city boundary.
Para 12.11 - Important to include that effective transport	267 (Leicestershire County Council)	Mod: -Add to para 12.11
connectivity and accessibility is provided.		It is important that effective transport connectivity and accessibility is provided.
Para 12.12 - Potential to accommodate further employment land within the city boundary on Land North of Hamilton Industrial Estate.	318 Lichfields on behalf of CEG	Site has been assessed using the standard methodology and is not deemed suitable for housing/employment development.
		The site has been assessed and was discounted, is as it was identified as a potential playing pitch for the northeast of Leicester sustainable extension and as having potential for mineral extraction.

Para 12.14: Do not disagree with the allocation of these 2 sites and understand that the rationale is derived from the HENA, but do not consider that they will bring forward enough office growth within the plan period and thwarts the delivery of office development outside the two allocated sites.	261 Marron Planning (on behalf of Charles Street Buildings),	The evidence that supports the local Plan supports the need for offices in the city centre. (EDNA) (EB/EM/1)
Suggested wording: -		
Delete last sentence after required.		
Replace with: -"This will primarily be provided within the City Centre at two allocated sites and within the Waterside Regeneration Area. This approach gives flexibility and allows for a rapid response to the market.	353 Leicester Green Party	It is too early to be able to assess the
- Questions the need for office space in the post-		impact of covid on office demand.
pandemic context. Notes that office space in the city centre is a priority, but	267 Leicestershire County Council	Welcomes the fact that offices in the city centre are noted as a priority. It is too early to assess the impact of covid
that evidence uses pre pandemic data.		on demand.
Policy E01 - Non- Strategic Economic Development Areas		
Objection to inclusion of Gypsy & Traveller transit site	107 Local Resident	Objection recorded under Site 687
The replacement of this site with industrial units should not be allowed, it should remain as a green. There hasn't been a sound consultation.	109 (Mowmacre Young Peoples Play & Development Association).	Objection recorded under Site 687
We do not support this development as it will have a detrimental impact on the environment, local businesses and local area. Is also likely to increase crime rates, antisocial behaviour particularly disruption to employees and employers	113 Local Resident	Objection recorded under Site 687

near vicinity. Visually, the proposed use of site is not in keeping with local area.		
Objection to inclusion of Gypsy & Traveller transit site	156 Local Resident	Objection recorded under Site 687
As a local business that is thriving and trying to grow, we find it shocking that land suitable for commercial/industrial use is being considered for non-commercial use. Such land is so scarce in the Leicester area that we have seriously been considering moving outside of Leicester to continue our company's growth.	169 Sukhjit Birah on behalf of Lotan Ltd (Local business)	<ul> <li>The majority of site 687 has been allocated for employment, to meet the need for industrial uses.</li> <li>There is also a need for gypsy and traveller transit sites, so a small portion is also proposed to meet this need.</li> </ul>
If land that is suitable for use as employment land is used to house a traveller site instead then our prospects for growth in Leicester look bleak indeed.		
There is a severe lack of land for companies to grow. The council should be helping with what little land there is for employment use to be used by local businesses.		
Our client owns Diamond House Care Home at Bewcastle Grove. To the north-east of our client's site is the proposed allocation Site 687.The client has no objection to employment land in the previous consultation. There is a clear need for employment land across the Local Plan.	266, ELG on behalf of Minstercare Group	Clear need for employment land welcomed and noted. The city's need for Gypsy & Traveller transit sites was identified in the 2019
This consultation draft has amended the allocation of site 687 to include both employment use and gypsy and traveller use (12 pitches). My client objects to this draft allocation on the basis of impact on amenity and appropriateness of site, and conflict with the relevant draft local plan policies.		GTAA addendum (EB/HO/2a). The 2022 Gypsy and Traveller Site Selection Paper (EB/HO/2b) outlines the methodology which lead to the allocation of 12 transit pitches at Beaumont Park. Guidance from the
There has been no evidence or justification provided as to why these sites have been identified as suitable for gypsy use. Nor is there any consideration of other sites that may be more appropriate. We would question the soundness of the Councils allocation of these sites for part gypsy use.		Multi Agency Traveller Unit aided in the selection of Beaumont Park for the transit allocation. The Council considers the site to have adequate highways access and limited issues with flooding.

Reference site allocations in Policy	331 Cllr David Bill of Hinckley & Bosworth BC	These are shown on the policy map
highway movements. Our client would strongly request that the gypsy use be removed from this draft allocation.		
part (f), there is a very strong likelihood that future applications for the employment use will be deterred by the inclusion of the gypsy site, with potential occupiers hesitant to occupy a site with restrictions to protect the amenity of the gypsy occupants. This in turn would detrimentally harm the LPAs ability to deliver the necessary employment within the Local Plan. In addition, existing uses including the school, care home and local residents (who already sit alongside the employment use) will potentially be disturbed by the transit site in terms of noise and		
Part (c) requires safe and convenient pedestrian and vehicular access. Thurcaston Road is not adequate for a gypsy transit site.		
Part (a) requires a safe environment for intended occupants and adequate on-site facilities. The draft allocation combines employment use as well as gypsy use and is already abutting an employment site. The nature of employment uses means there could potentially be large vehicles, machinery and equipment at the site as well as other industrial workings, which are unsafe alongside residential occupants.		

<ul> <li>E02, is considered to be too rigid in its protection of existing employment land. It should explicitly allow for a greater variety of potential alternative uses, including mixed-uses, where it can be demonstrated that those uses would not result in any detrimental effect on the operation of the surrounding remaining businesses.</li> <li>These amendments would assist in meeting additional housing needs at highly sustainable location whilst sufficiently protecting employment uses.</li> </ul>	278 Howes Percival LLP on behalf of Code Student Limited	Proportionate and up to date evidence has been used to inform policy. The policy includes other alternative uses. All sites were assessed consistently for their potential use, including housing or employment and the plan identifies separate housing allocations which are suitable for housing. Housing has been allowed in the lower quality E05 sites.
The current wording of Policy E02 would potentially stifle the expansion of the adjacent temple at 135 Gipsy Lane (onto the adjacent old parker plant site) This policy has been heavily informed by the 2017 Employment Land Study by Lambert Smith Hampton, which outlined the hierarchy of Economic Development Areas. The Study	319 Landmark Planning on behalf of BAPS Swaminarayan Temple	The 2017 study has been superseded by the EDNA 2020. It has been assessed (in row 32 of Appendix 3), where it is recommended to be classed as a general economic development area and graded D. See recommendation 2 paragraph 11.7.
<ul> <li>considers, in great detail, dozens of employment areas in the city. However, the Parker Plant site is not considered within any employment land list or designation.</li> <li>Suggest modification to E02 to add 'enable the expansion of existing adjacent religious, community and recreational facilities where a clear need has been established'.</li> <li>Request justification for exclusion of portal-framed buildings, from non-employment uses.</li> </ul>		The policy does not exclude Places of worship. An application would be considered on its merits. Portal framed buildings are generally the most modern type of construction and are an easily communicated way of differentiating between the multi-story textile mills / much older industrial buildings which are characteristic of
Policy E03 - High Quality Economic Development Areas -No Comments-		the majority of Leicester's industrial stock and relatively modern stock, which needs to be retained.

Policy E04 - Pioneer Park		
-No Comments-		
Policy E05 - Textile Area and Neighbourhood Employment Areas		
Suggesting a new site as an extension to area of policy ORA03 Minor or consider the site as one of the designated Neighbourhood Employment Areas in accordance with Policy E05 where housing (including student housing) could come forward where it can be clearly demonstrated that existing constraints can be mitigated, and it is not expected to result in any detrimental effect on the operation of the surrounding businesses.	278 Howes Percival LLP on behalf of Code Student Limited	Any new sites will be considered as part of the SHELAA update where its potential use will be assessed as part of the assessment. Comment not relevant to employment policy.
Not elaborated in policy or in supporting text what these constraints are (referring to housing), or if to be taken site by site basis.	331 Cllr David Bill of Hinckley & Bosworth BC 333 (Hinckley & Bosworth Borough Council)	The constraints need to be considered on a site-by-site basis, as the constraints of each site differ.
Policy E06 - St. George's Cultural Quarter		
-No Comments-		
Policy E07 - Employment: Support Strategies		
Support	331 (Hinkley and Bosworth Borough Council	Support noted and welcomed
Should make overt reference to encouraging skills retention, as identified within the Strategic Growth Plan.	267 (Leicestershire County Council)	Minor Modification. Add wording to paragraph 12.44 "and skills retention"
I greatly support the objectives to increase high quality employment land use. "Undesirable" development such as large scale warehousing, should be given a higher S106 charge to support desirable development, such as high-quality employment.	42 Local Resident	This would be difficult to implement.
Policy E08 - Vehicles Sales and Car Washes		
-No Comments-		

## Chapter 13 – Town Centre and Retail

Comments from: 245 (Cllr Roy Denney of Blaby District Council), 261 (Charles Street Buildings), 267 (Leicestershire County Council), 287 (Highcross Shopping Centre), 331 (Cllr. David Bill of Hinckley & Bosworth Borough Council)

Rep ID (name of Statutory Consultee if applicable)	Council Response
245 (Cllr Roy Denney of Blaby District Council)	The council believes that this is not required as detail pertaining to residential properties on upper floors already included in para 13.27 of the Local Plan as well as policies TCR04 'Central Shopping Core (Primary Shopping Area)', TCR05 (Town Centre Uses in Town/ District and Local Shopping Centres), TCR07 'Neighbourhood Parades'
331 (Cllr. David Bill of Hinckley & Bosworth Borough Council)	Support welcomed
261 (Charles Street Buildings)	This is relevant to all areas of the city and not just the city centre, so the council believes that this is not needed here to avoid repetition with the heritage chapter. Wording around this has been included in policy HE01 'Historic Environment'. However, the council acknowledges that
	Statutory Consultee if applicable)         245 (Cllr Roy Denney of Blaby District Council)         Statutory Consultee if applicable)         331 (Cllr. David Bill of Hinckley & Bosworth Borough Council)         201 (Charles Street

		chapter and will include reference to this in the TCR03 policy.
Suggestion to add text around other methods of sustainable transport including provision of electric charging points etc and making the city accessible for those who need access to a private vehicle.	267 (Leicestershire County Council)	The council feels that this has been sufficiently covered as part of building regulations and is also covered within chapter 16 'Transportation' of the Local Plan, particularly policy T02 "Climate Change and Air Quality".
Policy TCR04 - Central Shopping Core (Primary Shopping Area)		
Suggest that 'healthcare' is included in the list of examples of main town centre uses. This could include reference to where there is need for healthcare facilities/services. It might be that the city centre is the best location for accessibility for certain groups within the Leicester Urban area to access these services, and this need requires consideration against detraction from core shopping function.	267 (Leicestershire County Council)	Healthcare is mentioned as an 'other main town centre use' in the second para of policy TCR04. The demand for healthcare services and facilities has been taken into account in Chapter 7 'Health and wellbeing' of Local Plan Examination document EB/DA/1A (Infrastructure Assessment with Infrastructure Delivery Schedule (2022)) outlines the infrastructure that is already, and will be, required as part of the Plan period.
Policy does not refer to reducing the amount of land available in peripheral areas such as Belvoir Street, that currently have a number of vacant properties.	267 (Leicestershire County Council)	The policy is supportive of the effective reuse of vacant units in criteria f) and g) of this policy. The Council would be supportive of any units being developed across the Central Shopping Core.
As drafted part f) (vacant units) and the penultimate paragraph (active frontages) of the Policy are not sound or effective. These aspects of the policy do not reflect the Council's evidence base in terms of the need to prioritise the reoccupation of vacant floorspace, diversification of uses and the overall protection and growth of the central shopping core which is essential to the role and function of the city centre.	287 (Highcross Shopping Centre)	In relation to both suggested modifications, the council believes that the policy as drafted sufficiently flexible enough to address the issues. This is based on robust and proportionate evidence.

Mod suggested: "f) The length of time that a unit may have been vacant for Whether there is an identified need or demand for the unit."		
Mod suggesting that penultimate paragraph should be changed to state "On streets where there is lots of activity, residential or business uses (office, industry and storage) will not be appropriate at ground floor level except to provide entrances to these uses on upper floors as required should ensure that the building provides an active ground floor frontage."		
Policy TCR05 - Town Centre Uses in Town/ District and Local Shopping Centres		
-No Comments-		
Policy TCR06 - Development for Food and Drink Purposes		
As drafted the Policy inconsistently adopts different terminology in describing different types of 'food and drink' uses.	287 (Highcross Shopping Centre)	The policy will be amended to clarify the uses that this applies to. The council
Paragraph 1 references 'hot food takeaway and food & drink' uses as a 'sui generis'. However, this fails to recognise that a food and drink use, such as a restaurant, falls within Use Class E(b). Elsewhere reference is made to 'hot food takeaway and drink uses' and 'food, hot food takeaway and drink.'		suggests a minor modification to remove reference to 'sui generis.'
As drafted the inconsistent reference to 'food and drink' introduces uncertainty and reduces the effectiveness of the Policy and its reach depending upon the types of food and drink uses being assessed.		
Paragraph 1 should be amended as follows:		
"Food (Class E(b)), Hot food takeaway and food & drink facilities (Sui generis)"		
Had this policy had regard to or considered how it is compatible with public health initiatives to prevent obesity?	331 (Cllr. David Bill of Hinckley & Bosworth Borough Council)	A whole plan Health Impact Assessment (2022) has been carried out (document SD/7). The Health and Wellbeing chapter (Chapter 7) seeks to manage health impacts of development and should be read alongside this policy.
Policy TCR07 - Neighbourhood Parades		

-No Comments-		
Policy TCR08 - Main Town Centre Development Outside of Defined Centres		
-No Comments-		
Policy TCR09 - Planning Conditions: Main Town Centre Development and Class E Uses Outside of a Defined Centre		
Policy wording should be made more precise, the effect of which would be to afford greater protection to defined centres in accordance with other local and national policy for main town centre uses.	287 (Highcross Shopping Centre)	The council believes that the policy is robust as written. However, the council note the suggested changes in regard to
Part a) concerns the sale of comparison goods from out of centre supermarkets. However, as drafted the Policy fails to address the reverse position, namely the sale of convenience goods from out of centre comparison goods stores (e.g., retail warehouses). Part a) should state that controls will be imposed by condition on range of goods sold for all out of centre retail developments in accordance with an assessment of retail impact.		points a) and c) and will consider each o these as part of modifications if required
Similarly, part c) should be amended to ensure the policy is applicable to all Class E uses. The addition of the reference to " if that use does not require consideration of either the sequential or impact tests" limits the reach and effect of the policy to control such uses outside defined centres.		
Part a) should be replaced with the following: "a) Ranges of convenience and comparison goods sold from retail development, including supermarket, superstores and retail warehouse) outside defined centres will be limited by condition where the sale of such goods would adversely affect the viability of defined centres."		
Part c) should be amended to read: "c) A condition may also be necessary to restrict a Class E use to a particular sub-category if that use does not require consideration of either the sequential or impact tests."		

## Chapter 14 – Open Space, Sports and Recreation

Comments from: 71 (Canal and River Trust), 109, 115, 258, 267 (Leicestershire County Council), 282 (Harborough District Council), 301, 318, 328 (Severn Trent Water), 331, 333 (Hinckley & Bosworth Borough Council)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response
It is suggested that the Local Nature Recovery Strategy (LNRS) and the new requirements under the NERC Act for local authorities as brought by The Environment Act 2021 are referenced and explained in this chapter.	267 (Leicestershire County Council)	Will be added as a modification to supporting or introductory text in the chapter
Diagram 17:		
<ul> <li>Previously designated Leicester/Scraptoft green wedge should be replaced by Leicester/Scraptoft/Bushby Green Wedge as designated in the Harborough Local Plan (2019). Provided map extracts in representation.</li> <li>Grand Union Canal around the south of city should be shown.</li> <li>Leicester City Council boundary should be more prominent.</li> </ul>	282 (Harborough District Council)	This will be considered as minor modification to diagram 17
Diagram 17 includes green wedges beyond the City's Administrative Boundary. Important to identify correct areas to reflect latest designations in neighbouring authorities if this information is to be retained. It may be helpful to include a note on this diagram, and others, to recognise the 'for information only' status of details outside the City's Administrative Boundary.	318 (Lichfields on behalf of CEG),	As above Note to added to the diagram as minor modification.
Diagram 17 does not match the boundaries in the latest green wedge designations shared with HBBC in December 2022 (see Appendix 1)	333 (Hinckley & Bosworth Borough Council)	To be considered as modification to diagram 17.

Para 14.1 – Supporting evidence is of considerable age.	258 (Stantec on behalf of The Co- operative Group)	Evidence has been updated as appropriate in line with national policy and will be updated when the plan is reviewed after adoption.
Para 14.10 – Paragraph is untrue until plan is adopted, the paragraph should be amended to highlight this. No explanation as to how green wedge status has been removed.	<ul> <li>115 (Local resident)</li> <li>237 (Local Resident)</li> <li>301 (Leicester Friends of the Earth &amp; Climate Action Leicester and Leicestershire)</li> </ul>	Green wedge land is designated solely via the local plan, paragraph would not require clarification once Local Plan has been adopted.
Para 14.11 - Should be expanded to recognise the wider benefits which these transport connections within the green wedges can secure	318 (Lichfields on behalf of CEG),	The plan is intended to be read as a whole; other chapters fully address transportation matters.
Policy OSSR01 – Green Wedges		
No objection to policy. Welcome addition of criteria where development can be considered acceptable within the Green Wedge to meet the housing need. Considering Green Wedge is local designation as opposed to Green Belt, it is essential that Green Wedge policy is not used as a mechanism to stifle development.	258 (Stantec on behalf of The Co- operative Group).	Support welcomed and noted.
An ecological survey of the site must be considered alongside the planning application.	301 (Leicester Friends of the Earth & Climate Action Leicester and Leicestershire)	The Council would expect this for any sites that have ecological implications.
CEG supports the flexibility afforded by draft Policy OSSR01, seeking to protect green wedges whilst setting out the limited scenarios where development in green wedges will be permitted.	318 (Lichfields on behalf of CEG),	Support welcomed and noted.

	1	
For effectiveness and to reflect national policy, supporting text in para 14.11 should be expanded to recognise wider benefits which transport connections within the green wedges can secure, such as supporting improved connectivity and promoting active and sustainable travel choices.		This will be considered as a modification to paragraph 14.11
Should include another criterion for effectiveness:		This would run counter to the
'(f) where proposals will deliver essential infrastructure providing appropriate mitigation will be provided.'		policy objectives.
This change would accommodate appropriate development in limited scenarios, such as the delivery of the Thorpebury Southern Access Road, where this will establish sustainable transport connections with the City and appropriate mitigation with the green wedge(s) is provided.		
Would like client's land to be removed from Green Wedge designation.	334 (RG & P on behalf of Greyrock Properties Ltd)	The Council's view is that the land should remain designated due to the quality of the green wedge
HBBC support strong approach to Green Wedges as a policy tool to prevent the merging of settlements, to guide development form, to provide a green lung into urban areas and to provide a recreational resource and support retention of green wedges as policy tool and evidence to underpin the policy referenced on page 205, including Green Wedge Review Joint Methodology (2011), Green Wedge Review (2017) and Addendum Report (2020).	333 (Hinckley and Bosworth Borough Council)	Support welcomed and noted.
Support continued consistency of green wedge designations in Leicester and Leicestershire with the revised NPPF (2021).		
It is recommended that 'allocations' is replaced with 'designations' for clarity.		This will be amended as a modification.
Wish to retain park view equestrian centre as essential green space.	349 (Leicestershire & Rutland Bridleways Association)	Site to be retained. This site (580) was previously included in the Regulation 18 Version of the Local Plan; however,

population, mentioned in this policy, is lower than that adopted by other cities.	& Climate Action Leicester and Leicestershire)	evidence has been used to inform policy.
Policy OSSR03 – Open Spaces in New Development Leicester's 'adopted standard' for publicly accessible open space per 1000	301 (Leicester Friends of the Earth	Proportionate and up to date
supported provided the schemes do not adversely impact the primary function of the green space."		
additional benefits to the local green space through biodiversity and amenity benefits. We would therefore recommend that the following point is added to Policy OSSR02 to support the delivery of flood alleviation projects where required within green spaces: "Development of flood resilience schemes within local green spaces will be		in broader terms by provisions d), e), and f) of Policy OSSR02.
We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in	328 (Severn Trent Water)	The Council believes that the issue being addressed by the suggested additional provision is already covered
Policy OSSR02 – Development of Open Spaces The criteria for allowing development of open space do not currently take climate change into account.	301 (Leicester Friends of the Earth & Climate Action Leicester and Leicestershire)	The policy takes into account the existing typology of the open space, including its quantity, quality, and accessibility, when determining whether or not development should be permitted
		Local Plan due to a long Leasehold on site.
		this was withdrawn in the submission version of the

-No Comments-		
Policy OSSR05 - Playing pitches and associated facilities		
-No Comments-		
Policy OSSR06 – Built Sports Facilities		
-No Comments-		
Policy OSSR07 – Waterways		
In support	71 (Canal and River Trust)	Noted and welcomed.

# Chapter 15 – The Natural Environment

Comments from: 102, 109, 245, 259 (Natural England), 265, 267 (Leicestershire County Council), 301, 316, 328 (Severn Trent Water), 331, 333 (Hinckley & Bosworth Borough Council)

Main Issues Raised	Rep ID (name of Statutory Consultee or organisation where applicable)	Council Response
It is suggested that the Local Nature Recovery Strategy (LNRS) is referenced and explained in this chapter.	Statutory Consultee: 267 (Leicestershire County Council)	It is accepted that reference should be made to the Local Nature Recovery Strategy, and it is suggested for inclusion as a modification to paragraph 15.2 of the Local Plan (see Council response to Natural England representation below).
Ecological Networks have not been mapped and as such this Local Plan is missing important evidence base that would point to opening up new corridors as part of development and not merely following river corridors, railway lines or dismantled lines protected under Trust or designation. The development of housing / employment sites outside the city will remove access to open countryside, so retention of access to linked greenspaces is very important for existing / new County residents and biodiversity as part of nature recovery – Master planning of where sites could be connected is required. It should not be a piece meal approach as per individual planning applications but led by spatial policy.	Statutory Consultee: 267 (Leicestershire County Council)	The Green Infrastructure Strategy (2015-2025) [EB/NE/1] p 54, already maps ecological networks within the city and is referenced within paragraph 15.1 of the local plan. The City Council cannot place policy criteria on the development of housing / employment sites outside the city. However, cross boundary implications have been considered on housing and employment sites that are close to or border the city's administrative boundaries. Supporting text for each of the

		strategic sites with allocations for housing (Policies Sl02-Sl05) requires master planning that makes provision for green infrastructure, biodiversity net gain and open space that is in keeping with the character of the surrounding area. Due regard must also be had to the surrounding green wedge.
<ul> <li>Protection of valued habitats must be at the heart of the LP. In particular, irreplaceable habitats, including ancient woods and veteran trees must be protected from loss and damage. To achieve this, the LP should:</li> <li>Stipulate a minimum 50 metre buffer for development from ancient woodland where developments exceed 10 dwellings. This is to minimise indirect impacts from urbanisation, including light and chemical pollution, and recreation on the ecological integrity of ancient woodland.</li> <li>Protect ancient woodland sites through strong policy in the LP. We would welcome the opportunity to help develop suitable policy wording as the LP is brought forward. Our Planners' Manual for Ancient Woodland and Veteran Trees includes guiding principles and examples of policy wording.</li> <li>Give weight to the relevant LNRS, as it is refined, which should identify ancient woodland sites, to ensure that development is not allocated in close proximity to ancient woodland.</li> <li>For veteran trees, the LP should encourage them to be recorded on the Ancient Tree Inventory, and to consider locations where it might be suitable to place a Tree Preservation Order on any ancient, veteran or notable trees recorded. In addition, the LP should encourage a buffer zone to go beyond the minimum distances stipulated in planning advice.</li> </ul>	Other: 265 (The Woodland Trust)	The City Council considers that the protection of valued habitats is sufficiently covered by Policy NE01. Protecting designated sites, legally protected and priority species, and priority habitats, Policy NE03. Green and Blue Infrastructure, and Policy NE04. Ancient Woodland, Veteran Trees, and Irreplaceable Habitats.
The LP must go beyond minimum requirements for BNG and be an example of best practice: The LP should require development projects to deliver 20 per cent BNG.	Other: 265 (The Woodland Trust)	The requirement for 10% Biodiversity Net Gain in the policy is aligned with requirements under the

Consideration should be given to the quantum of other investment sources (public and private) which will be needed in order to meet these targets. The LP should require BNG units to be maintained for a minimum of 50 years, not just the 30 set out in the Environment Act. i. This is particularly important for woodland creation, as it takes many decades for new woods to reach maturity and their full ecological potential. ii. BNG should deliver a rich mix of habitats including native woodland, informed by LNRSes. iii. Habitat creation funded through other mechanisms (such as public funds) should also be maintained in the long term.		Environment Act 2021. Document EB/DI/3 Whole Plan Viability Assessment (2022) has tested the policy and found that its requirements do not unduly affect viability. An increase in the percentage of biodiversity net gain required has not been tested and may adversely affect viability.
<ul> <li>The LP should give strong weight to LNRSs for development site allocation at a local level.</li> <li>This will be essential to embed avoidance of impacts to ancient woodland and other existing sensitive natural assets, by providing a 'spatial' element to site allocation decisions. It is vital that development is allocated in a way which protects important sites for nature, maintains ecological integrity and maximises potential enhancements from land in recovery.</li> <li>Once a site has been allocated in a local plan, it is more likely to receive planning permission, so it is essential to embed ecologically coherent criteria for spatial prioritisation at the framework level.</li> <li>LNRSes should also be used to inform priority locations for the provision of green infrastructure, and habitat creation and enhancement through BNG.</li> </ul>	Other: 265 (The Woodland Trust)	It is accepted that reference should be made to the Local Nature Recovery Strategy, and it is suggested for inclusion as a modification to paragraph 15.2 of the Local Plan (see Council response to Natural England representation below).
The LP should set standards for high-quality green infrastructure for development.	Other: 265 (The Woodland Trust)	The Local Plan contains the following policies that require the inclusion of green

• Everyone should be able to see three trees from their home.		infrastructure in development:
Everyone should be no more than 300 metres from the nearest natural green space, with safe and accessible routes.		Policy OSSR03. Open Space in New Development, Policy NE02. Biodiversity Gain. The criteria of these policies set expectations regarding the quality of the green infrastructure and require that it be connected to wider open space / green infrastructure network.
		While the Local Plan does not adopt a standard for the distribution of green space across the city, it does carry forward the existing standard of 2.88 ha of publicly accessible open space per 1,000 population (para. 14.15).
General Policy Guidance Suggestion: "Blue and Green Infrastructure Policy	Other: 328 (Severn Trent Water)	The City Council believes that the Local Plan and its policies are aligned with these general policy guidance suggestions.
Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm. Supporting Text: The incorporation of Sustainable Drainage Systems (SuDS) into blue green corridors can help to improve biodiversity, assisting with the wider benefits of utilising SuDS. National Planning Policy Framework (2018) paragraph 170 States:		Policy NE03. Green and Blue Infrastructure and Policy CCFR06. Managing Flood Risk and Sustainable Drainage Systems (SuDS) will be applied to developments in a coordinated way so that SuDS can become part of the existing blue and green

<ul> <li>'Planning policies and Decisions should contribute to and enhance the natural and local environment by:</li> <li>a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan).</li> </ul>		infrastructure, where it is deemed suitable and appropriate to do so.
b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland.		
c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate.		
d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;'		
Para 15.2 - Since the previous consultation on the Local Plan, preparation of Local Nature Recovery Strategies (LNRS) has progressed therefore Natural England advises that reference should be made to these within the chapter on the Natural Environment. To ensure that the Plan is sound Natural England advises that the Plan should make reference to the Local Nature Recovery Strategy for Leicestershire.	Statutory Consultee: 259 (Natural England)	The wording suggested by Natural England is considered acceptable and is suggested for inclusion as a modification to the Local Plan.
Natural England suggest that the following wording should be added to paragraph 15.2 (or other appropriate paragraph): "Leicester City will work collaboratively and across administrative boundaries with other Local Planning Authorities in the County, public bodies and local stakeholders, in order to support the delivery of strategic ambitions and priorities for nature, such as those set out in the emerging Local Nature Recovery Strategy."		
Para 15.5 – There is no explanation of the process of removing this status and we strongly object to the idea that this should be possible.	Other: 301 (Leicester Friends of the Earth & Climate Action Leicester and Leicestershire)	Relevant consultees have been consulted on all site allocations, and the City Council's Biodiversity Action Plan has informed the

		suggested mitigations for sites with biodiversity constraints.
Para 15.13 – suggest that additional text be added to explain references to GI framework in policy NE03.	Statutory Consultee: 259 (Natural England)	Additional text to explain the references to the GI framework in policy NE03 will be considered for inclusion as a modification to the Local Plan. But it is also noted that this is voluntary and not a statutory requirement.
Policy NE01 - Protecting designated sites, legally protected and priority species, and priority habitats		
Natural England considers that this policy does not include reference to ecological networks in the policy wording (although we acknowledge it is mentioned in accompanying text). Connecting nature conservation sites is an important step to establishing the Nature Recovery Network and we advise that this aspect should be included in the policy wording to reflect the guidance in the NPPF (paragraph 174 d).	Statutory Consultee: 259 (Natural England)	The additional wording for the policy suggested by Natural England is considered acceptable and will be considered for inclusion as a modification to the Local Plan.
Suggested modification is addition of the following wording to the policy: "Development proposals should create new habitats, and links between habitats, in line with the Green Infrastructure Strategy and the Local Nature Recovery Strategy (once completed) to maintain and enhance a network of wildlife sites and corridors, to minimise habitat fragmentation and provide opportunities for species to respond and adapt to climate change."		
Policy provides a loophole for development on the most important green spaces, 'where the benefits of the development in the location proposed clearly outweigh the impact' on the site itself and the network of SSSIs. This is so vague that it will inevitably allow developers to convince the planning committee to approve applications on the grounds of benefits to persons unknown. It needs to be clearer to effectively protect the most important biodiversity sites. It should state unequivocally that development on nationally or locally designated sites and priority habitats will not be permitted.	Other: 301 (Leicester Friends of the Earth & Climate Action Leicester and Leicestershire)	It is the City Council's view that the policy has been prepared in a way that aligns with para. 174 of the NPPF, while also aligning with the policies of the Framework taken as a whole.

We also object to the mention of off-site compensation for harm to biodiversity. It has been shown that this does not work. Any harms should be minimised and, as a last resort, compensated on the site itself. This only refers to biodiversity in the final paragraph. Suggested wording: "Development will only be permitted where significant harm to biodiversity and/or geodiversity are/is avoided. Where harmful impacts cannot be avoided, they should be minimised and mitigated for through design, layout and detailing of the development, or as a last resort compensated for, which may include off- site measures."	Statutory Consultee: 333 (Hinckley & Bosworth Borough Council). Other: 331 (Cllr David Bill of Hinckley & Bosworth Borough Council)	The addition of "geodiversity" in the policy is considered acceptable and will be considered for inclusion as a modification to the Local Plan.
Policy NE02 – Biodiversity Gain		
10% is too modest suggest 20%.	Other: 245 (Blaby District Council Cllr Roy Denney)	The requirement for 10% Biodiversity Net Gain in the policy is aligned with requirements under the Environment Act 2021. Document EB/DI/3 Whole Plan Viability Assessment (2022) has tested the policy and found that its requirements do not unduly affect viability. An increase in the percentage of biodiversity net gain required has not been tested and may adversely affect viability.
We suggest that it could be strengthened further and offer greater clarity on Biodiversity Net Gain. We consider that the first sentence of the policy wording gives the impression that biodiversity should only be enhanced where possible. In addition, it would be beneficial to include reference the Local Nature Recovery Strategy within both the policy wording and the explanatory text. Natural England suggests the following revised wording for Policy NE02:	Statutory Consultee: 259 (Natural England)	The additional wording for the policy and the supporting text suggested by Natural England is considered acceptable and will be considered for

1st sentence: "Following application of the mitigation hierarchy, all development proposals should ensure opportunities are taken to retain, protect and enhance biodiversity and geodiversity features. All qualifying development proposals must deliver at least a 10% measurable biodiversity net gain attributable to the development."		inclusion as a modification to the Local Plan.
Addition to bullet point (c) " agreed with the council and are consistent with the Local Nature Recovery Strategy. "		
Additional bullet point – "All development proposals, unless specifically exempted by Government, must provide clear and robust evidence for biodiversity net gains and losses in the form of a biodiversity impact assessment, which should be submitted with the planning application."		
Accompanying text paragraph 15.10 3rd bullet point should be amended as follows: "Enhancements should seek to contribute to <i>the Leicestershire Local Nature Recovery Strategy and</i> "		
It is the HBF's opinion that the Council should not deviate from the Government's requirement for biodiversity net gain as set out in the Environment Act. There are significant additional costs associated with biodiversity gain, which should be fully accounted for in the Council's viability assessment. More work needs to be undertaken to address viability concerns raised by the housebuilding industry in order that net gain does not prevent, delay or reduce housing delivery.	Other: 316 (Home Builders Federation)	It is the Council's opinion that the policy is fully aligned with the Government's requirements for biodiversity net gain. Document EB/DI/3 Whole Plan Viability Assessment (2022) has tested the policy and found that its requirements do not unduly affect viability.
Policy NE03 - Green and Blue Infrastructure		
We suggest that reference should be made to the Green Infrastructure Framework: Principles and Standards which has recently been launched and Leicester City's own Green Infrastructure Strategy. The GI Framework provides a valuable resource offering guidance to create certainty about the quality and quantity of GI required. The GI Design Guide will complement the National Planning Policy Framework and foster best practice	Statutory Consultee: 259 (Natural England)	Additional text to explain the references to the GI framework in policy NE03 will be considered for inclusion as a modification to the Local Plan. But it is also noted that

solutions which add value across the development industry. The Framework also includes updated Access to Greenspace Standards which the Local Plan may want to refer to.		this is voluntary and not a statutory requirement.
Natural England suggests that an additional sentence should be added to paragraph 15.13 should be added to the explanatory text of this policy: "Natural England's Green Infrastructure Framework and Leicester City's Green Infrastructure Strategy provides a useful guide for considering green infrastructure."		
Add the following clause: "Where any development cannot be connected to the wider network because of different land ownership the development should not proceed with any design which would preclude such connectivity in the future."	Other: 245 (Blaby District Council Cllr Roy Denney)	The Council considers that the suggested clause would hamper deliverability.
Policy NE04 - Ancient Woodland, Veteran Trees, and Irreplaceable Habitats		
Policy NE04 is unsound as it fails to comply with paragraph 180c of the NPPF. The policy states that developments resulting in the loss of or harm to ancient woodland, ancient or veteran trees is only permitted when the public benefit clearly outweighs the loss or harm to the habitat. The NPPF requires 'wholly exceptional reasons' to exist, such as infrastructure projects and national infrastructure projects.	Local Resident: 102	It is the Council's view that the policy is in compliance with paragraph 180 c) of the NPPF as well as with the policies of the Framework taken as a whole.
Add "substantially to policy criterion a): "a) The public benefit clearly substantially outweighs the loss or harm to the habitat"	Other: 245 (Blaby District Council Cllr Roy Denney)	It is the Council's view that the policy is in compliance with NPPF requirements
This policy provides a loophole for the destruction of what are acknowledged to be 'irreplaceable habitats,' when 'the public benefit clearly outweighs the loss or harm to the habitat' and 'a suitable compensation strategy is agreed.' It is difficult to imagine what a suitable compensation strategy for the loss of something irreplaceable could possibly be. It should state that the development will not be permitted to harm ancient trees or irreplaceable habitats, with no exceptions.	Other: 301 (Leicester Friends of the Earth & Climate Action Leicester and Leicestershire)	It is the Council's view that the policy is in compliance with paragraph 180 of the NPPF, while also aligning with the policies of the Framework taken as a whole.

## Chapter 16 – Transportation

Comments from: 1, 42, 157, 226, 245, 267 (Leicestershire County Council), 279 (CPRE Leicestershire), 316, 318, 328 (Severn Trent Water), 329 (National Highways), 331, 333 (Hinckley & Bosworth Borough Council), 348, 349, 355

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response
The Council's plans for tackling the inexorable increase in road traffic are fundamentally flawed because they lack any effective mechanism for restricting traffic.	157 Local Resident	The site has been independently assessed and mitigation has been identified to support the development. The Council acknowledges that further transport work is required to address and provide for cumulative and cross boundary transport impacts. The city and the County councils along with relevant districts and others to agree the scope of work needed to address transport impacts cross boundary. It is also proposed that the city council will produce supplementary guidance post adoption to address any issues that arise from the above work.
Climate change and air quality should be listed as separate matters, climate change must be an overriding priority of the plan.	226 Local Resident	Climate change is a running theme through the local plan – the plan cross reference policies from climate change including within the transport

		chapter. These policies are informed by robust evidence and studies.
No clarity over sources of funding or timescales for delivery.	226 Local Resident	Funding has been identified to 2026.
		The Transport Infrastructure Assessment has split the required infrastructure into different time periods for delivery.
		Further work to explore and develop a mitigation package as discussed above. It is expected that this will focus on the Northern area of the city.
		We recognise that there are future funding uncertainties and various government funding pots are likely to come forward during the lifetime of the plan to support future growth.
		The Council will also work with Central Government and neighbouring highways authorities to secure funding for major infrastructure.
Objectives seek to cater for growth rather than demonstrating mitigation.	226 Local Resident	Funding has been identified to 2026.

		The Transport Infrastructure Assessment has split the required infrastructure into different time periods for delivery. Further work to explore and develop a mitigation package as discussed above. It is expected that this will focus on the Northern area of the city.
The council should not be implementing work place parking levy as it is too expensive and there isn't cheap enough public transport.	1 - Local Resident	<ul> <li>The potential for a Workplace Parking Levy for the city has been explored and although the results were promising, it has been decided not to progress this initiative due to the current national cost of living crisis.</li> <li>Continue to review capital and revenue raising opportunities to support sustainable transport.</li> </ul>
Council should implement either a workplace parking levy or a congestion charge to discourage private cars from entering the Leicester Urban Area.	157 Local Resident	The potential for a Workplace Parking Levy for the city has been explored and although the results were promising, it has been decided not to progress this initiative due to the current national cost of living crisis.

		Continue to review capital and revenue raising opportunities to support sustainable transport.
Text should include cross-boundary growth impacts in the North of Leicester area, work that has taken place to date (including as part of Charnwood LP) and will be required in future to develop a transport strategy for the area.	267 (Leicestershire County Council)	Ongoing discussions with Leicestershire County Council. Funding has been identified to 2026.
		The Transport Infrastructure Assessment has split the required infrastructure into different time periods for delivery.
		Further work to explore and develop a mitigation package as discussed above. It is expected that this will focus on the Northern area of the city.
Neighbouring transport and planning authorities should be added to the list of partners referred to.	267 (Leicestershire County Council)	The council are willing to make this modification.
Criterion relating to the role of the City of Leicester within the wider Housing Market Area (HMA) / Strategic Growth Plan should be added.	267 (Leicestershire County Council)	The council are willing to make this modification.
Suggest that the city's proposed parking aims, objectives and policies should be considered in conjunction with those of the County and neighbouring district Councils.	267 (Leicestershire County Council)	This will be considered with County, but the council will produce further guidance post examination in the form of supplementary or informal guidance to provide indictive

		standards and design options for parking.
None of the policies, as currently written, provide an equivalent to Charnwood Borough Council's modified policy INF2.	267 (Leicestershire County Council)	Ongoing discussions with Leicestershire County Council. on this matter. The city council will consider modification on this matter related to ongoing discussion s regarding a statement of common ground which will cover this issue.
Overlap and duplication across the policies of this chapter, suggest refinement.	267 (Leicestershire County Council)	City Council disagrees with this comment, transport is a complex matter and the policies and supporting text provide enough detail to support the city's approach to transport. However, if further modifications are required to improve clarity the then the council will accept some plan changes.
Cumulative Impact with Charnwood BC - limited discussion / consideration of the cumulative impact of growth aspirations of two areas especially on SRN (A46 corridor) - this needs to be referenced in highway development policy.	329 (National Highways)	We are having ongoing discussions with Leicestershire County Council. As above. Further work to explore and develop a mitigation package as discussed above. It is expected that this will focus on the Northern area of the city.

		Council is working on a statement of common ground to agree a way forward on this matter.
Fails to talk about 'freight', e.g., in light of the shift to greater levels of online shopping.	267 (Leicestershire County Council)	The Council will consider making a modification on this matter related to this matter.
All vulnerable road users should be included on multi-user roads, newly constructed paths should be integrated with existing public rights of way.	348 The British Horse Society	Council considers this a matter for the emerging local transport plan rather than the local plan.
Would like to add a new bridleway to the plan.	349 Leicestershire & Rutland Bridleways Association	Council considers this a matter for the emerging local transport plan rather than the local plan.
Para 16.8 - Questions if the transport vision is part of the city context or wider Leicestershire context.	267 (Leicestershire County Council)	Ongoing discussions with Leicestershire County Council. The local plan relates only to the city from a land use perspective. However, the plan also acknowledges the role of the city within the wider county & HMA area. Further modifications could be considered if this is not deemed to be clear.
Para 16.14 – Erroneous date "Autumn 2022".	1 Local Resident	The Council are willing to make modifications to provide clarity
Para 16.14 – High prices of public transport not addressed.	1 Local Resident	Not a local plan matter.

Para 16.14 - Asking if plan will be updated to reflect Leicester City Council's recent decision not to pursue a Workplace Parking Levy as 16.14 refers to possibly introducing it.	267 (Leicestershire County Council)	Plan will be updated to provide the most update position on the workplace parking levy.
Para 16.17 - Opportunity here to more explicitly say why these projects are important to better connecting Leicester to other places across the region	267 (Leicestershire County Council)	The Council will consider making modifications to the supporting text in relevant chapters to improve cross boundary connectivity.
Para 16.17 - The 5th bullet point down is now superseded by IRP proposals for curtailed HS2 Phase 2B.	267 (Leicestershire County Council)	The Council will suggest modification to update the position.
Para 16.17 - The suggestion here implies that HS2 Eastern leg is going ahead. As this now seems unlikely in the near future, there is still the need for better and faster rail serviced to the North East and North West	42 Local Resident	The Council will suggest modification to update the position.
Paras 16.25-16.35 - Section could be amended to include appropriate references to the cross-boundary interdependencies and need for collaboration between the City and County. Include additional text highlighting those specific areas of the "Leicester Urban Area" that are beyond the city boundary.	267 (Leicestershire County Council)	The Council is discussing with Leicestershire County Council.
Diagram 18 – Thorpebury should be included	318 Lichfields on behalf of CEG	Council is willing to amend any diagram where it helps to make the spatial aspects of the plan more understandable.
Para 16.36 - Referencing the SELTS strategy within this section which is focusing on priority areas to help encourage walking and cycling.	267 (Leicestershire County Council)	The Council is discussing with Leicestershire County Council.
Paras 16.37-16.48 - Include appropriate references to the need for collaboration between the City and County.	267 (Leicestershire County Council)	As above Further work to explore and develop a mitigation package

		as discussed above. It is expected that this will focus on the Northern area of the city. Council is working on a statement of common ground to agree a way forward on this matter.
Para 16.48 - Add supporting text of 'To this end, all paths developed by informal use or of a historic nature should be added to the definitive map of the city footpaths which should be readily available to the residents and visitors'.	245 (Cllr Roy Denney of Blaby District Council)	This is not a matter for the local plan however could potential a matter for the emerging local transport plan.
Para 16.56 - In relation to park and ride - want to work with Leicester City Council to increase usage and reduce the level of financial support that the two authorities are currently required to provide.	267 (Leicestershire County Council)	Whilst the plan puts importance on park and ride as a highways mitigation method the funding and operational matters are separate to the local plan.
Para 16.56 - No specific reference here to the potential Great Central Railway Park and Ride site.	267 (Leicestershire County Council)	The proposal has been deleted since reg 18.
Paras 16.57-16.62 – Include cross boundary growth impacts in North of Leicester	267 (Leicestershire County Council)	The As above Further work to explore and develop a mitigation package as discussed above. It is expected that this will focus on the Northern area of the city. Council is working on a statement of common ground to agree a way forward on this matter.

Para 16.59 - Paragraph is no longer up to date.	279 (Campaign to Protect Rural England – Leicestershire)	The Council will suggest appropriate modifications to address this.
Para 16.76 – Wording gives Development Plan status to a document (Future SPD), which is not part of the Plan.	316 Home Builders Federation	The Council acknowledges the weight of an SPD is not the same as a DPD but the view of the council that matters such as parking standards in particular should be included with supplementary guidance rather than within the local plan.
Policy T01 - Sustainable Transport Network		
In support	329 (National Highways)	Leicester City Council welcomes the support of this policy from National Highways.
Add text to the end of sentence: 'sustainable transport for the City "and wider urban area" Add text to the end of the sentence 'as indicated in the Leicester Transport Plan at the end: "and the relevant policies and strategies of Leicestershire County Council and District Councils adjoining the Leicester Urban Area."	267 (Leicestershire County Council)	The city would consider making these modifications to incorporate these changes.
Add supporting text to policy regarding site schemes that cross boundaries.	267 (Leicestershire County Council)	The city would be willing to consider making these modifications to incorporate these changes.
CPRE supports the creation of a comprehensive sustainable transport network that will serve the proposed and existing development and mitigate against climate change.	279 Campaign to Protect Rural England - Leicestershire	The plan is clear what is meant by sustainable development.
The commitment of para 16.13 is not carried through to the wording of the policy. Policy T01 should be amended for soundness to refer to the need to deliver new	318 Lichfields on behalf of CEG	The Council will consider making modifications to the

connections to the wider Leicester Urban Area, to promote sustainable		supporting text in relevant
development and encourage sustainable travel patterns.		chapters to improve cross boundary connectivity.
Recommend adding wording to refer to EVs.	333 (Hinckley & Bosworth Borough Council)	This is addressed in criteria 'e' of the Policy. Since producing the plan, the delivery of EV charging infrastructure is being address primarily through building regulations.
Title could be reworded to address sustainable travel modes.	333 (Hinckley & Bosworth Borough Council)	The council would consider this as a modification if it provided useful clarity.
Minor revisions could add clarity and align with LTP and strategic objectives.	333 (Hinckley & Bosworth Borough Council)	The LTP is only at an early draft stage and would not be pertinent to amend these objectives at this stage.
Recommend illustrating modal hierarchy in policy.	331 Cllr. David Bill of Hinckley and Bosworth BC	This will be addressed in the future draft LTP rather than the local plan.
No reference to protecting pedestrians from cycle lanes.	42 Local Resident	The council promotes shared spaces for cycling and walking – this would be resolved during the design stage of planning applications.
Policy T02 - Climate Change and Air Quality		
No information is provided to show the extent to which the policy will deliver against the council's climate change targets.	279 Campaign to Protect Rural England - Leicestershire	Climate change is a running theme through the local plan – the plan cross reference policies from climate change including within the transport chapter. These policies are

			informed by robust evidence and studies.
Point d)	– Change "vehicle" to "vehicles"	267 (Leicestershire County Council)	The Council would be willing to make this modification.
Policy T	03 - Accessibility and Development		
In suppo	ort	329 (National Highways)	Leicester City Council welcomes the support of this policy from National Highways
Cycling:			
-	Reference should be made to new Government Standards of LTN 1/20 within the cycling points.	267 (Leicestershire County Council)	The Council would be willing to make this modification.
-	Plans for cycle lanes and walking paths should include equestrians.	348 The British Horse Society	Local Plan is not the forum for changing rules around road user hierarchy. This is a matter for central government.
-	Cycle network should be defined clearly street by street.	355 Climate Action Leicester and Leicestershire and Friend of the Earth	This is a matter for the local transport and other emerging transport guidance.
-	Developer funded cycle and walking routes should be included in all new development.	355 Climate Action Leicester and Leicestershire and Friend of the Earth	Policies within the plan promote cycling and walking routes within all new relevant developments.
Buses: -	Suggest the policy would benefit from an additional objective of ensuring that any new bus services/route alterations provided to serve	267 (Leicestershire County Council)	City council would be willing to make this modification.

development are financially viable beyond the initial period of developer subsidy/contributions.		
Rail:		
<ul> <li>Opportunities to include station masterplan and delivery. Suggest inclusion of a specific rail policy.</li> </ul>	267 (Leicestershire County Council)	The CDA chapter highlights the importance of the station masterplan. The City Council would be willing to include some form of rail policy assuming it provided useful clarity.
Policy T04 - Park and Ride		
Para 16.56 - Policy could be strengthened to emphasise the need for an evidence- based assessment of Park and Ride options/needs.	267 (Leicestershire County Council)	The plan shows there is a requirement for new park and ride sites and it is unclear what further evidence would be needed to justify whether additional facilities are needed or not.
Park and ride routes should pass larger destination places and run later	42 Local resident	Not a matter for the local plan.
Policy T05 – Freight		
Suggest adding reference to EVs in wording to align with T06, T07 and T01.	<ul><li>331 Cllr. David Bill of Hinckley and Bosworth BC</li><li>333 (Hinckley &amp; Bosworth Borough Council)</li></ul>	This is addressed in other policies elsewhere Since producing the plan the delivery of EV charging infrastructure is being address primarily through building regulations.

Station development plans should include provision for light goods delivery	42 Local resident	This is matter for the station masterplan and the various future planning applications.
Policy T06 – Highways Infrastructure		
Doesn't demonstrate that sufficient priority is being given to the prioritisation of sustainable transport over the improvement of highways infrastructure.	279 (CPRE – Leicestershire)	Ongoing discussions with CPRE as part of DtC.
Title of the policy does not reflect the content.	267 (Leicestershire County Council)	Ongoing discussions with Leicestershire County Council.
Suggestion to add wording to refer to EV infrastructure to align with T05, T07 and T01 to ensure effectiveness.	<ul><li>331 Cllr. David Bill of Hinckley and Bosworth BC</li><li>333 (Hinckley &amp; Bosworth Borough Council)</li></ul>	This is addressed in other policies elsewhere Since producing the plan the delivery of EV charging infrastructure is being address primarily through building regulations.
Policy T07 – Car Parking		
Section c) 5 <sup>th</sup> bullet point - Review the wording and supporting text covering electric vehicle charging in view of proposed modification 3h to the Charnwood Local Plan.	267 (Leicestershire County Council)	Ongoing discussions with Leicestershire County Council.
Car parks should be designed to be permeable or incorporate SuDs to manage surface water flows.	328 (Severn Trent Water)	The local plan has detailed policies around landscaping and SUDS. The council is willing to make a modification to this policy to make it clearer around this requirement if required.

### Chapter 17 – Future Minerals and Waste Needs

Comments from: 267 (Leicestershire County Council), 300 (Historic England)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response and Action
Para 17.11 - Refers to the Leicestershire Municipal Waste Management Strategy. For information, this strategy is currently being reviewed with an expected adoption date of early 2023.	267 (Leicestershire County Council)	The council notes this comment.
Para 17.13 - This should be updated to reflect the latest government position on fracking.	267 (Leicestershire County Council)	The Council will consider making a modification to the supporting text in para 17.13 to reflect latest position.
Policy FMWN01 - New Waste and Existing Waste Uses		
Policy should also make reference to Policy HE02. Any minerals or waste application would have the potential to harm archaeological remains so reference to archaeology is necessary for the draft policy to meet the Council's own requirements for the historic environment which includes archaeology	300 (Historic England)	The Council will consider making a modification to add a reference to HE02
Policy FMWN02 - End of Life Vehicle Facilities		
-No comments-		
Policy FMWN03 -Managing Leicester's Minerals Resources		
-No comments-		
Policy FMWN04 - Provision of New Aggregate Recycling Facilities		
-No comments-		

## Chapter 18 – Development and Infrastructure

#### Comments from: 162 (Blaby District Council), 267 (Leicestershire County Council), 279, 316, 318

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response and Action
Based on Blaby's calculation Leicester City cannot meet the forecasted provision of land for educational need across plan period. There appears to be an expectation that educational need will be accommodated beyond the city. It is unclear whether there is capacity to meet this need outside of the city. City should establish a long-term strategy to meet land supply required for educational infrastructure. Continue dialogue with adjoining local authorities and partners to ensure educational need is managed and provided for appropriately.	162 (Blaby District Council)	<ul> <li>Position is updated in the January 2023 Infrastructure Assessment which clarifies education requirement.</li> <li>The council has been engaging with Education at Leicestershire County Council and neighbouring authorities for strategic sites.</li> </ul>
Concern about the emphasis given to the provision of new highway infrastructure, especially new road capacity. Paragraph 18.5 refers to the Strategic Growth Plan and longer-term strategic needs within Leicester and Leicestershire. Among the numerous issues identified within the SGP is the aspiration for a 40km long Expressway south and east of Leicester. Support for development in locations on that route (which is not within this plan) would heavily rely on car use. This approach is not consistent with the need to mitigate climate change. 18.10 notes that Appendix 4 only provides some of the detail and that "it is the intention of the council to produce a supplementary planning document following the adoption of this plan." Do not consider that this provides sufficient	279 Campaign to Protect Rural England - Leicestershire	The Council has prepared a comprehensive evidence base to support the local plan. The focus of this is around promoting sustainable methods of transport in the first instance. The Council is also working on additional evidence for transport which will be discussed at examination.
detail regarding the scope or delivery of the measures that will be sought. Para 16.59 goes on to speculate about the expressway to the South and East of Leicester. That scheme was in the SGP but subsequently Midlands Connect have withdrawn from promoting it. It is not in any forward planning by National Highways and so does not appear likely to happen in the form perceived. Any development proposals along that corridor would be outside the Leicester Plan and any local infrastructure provision to support them would be a matter for the		

relevant authority. We also note that the scheme is not included in the list of schemes in Appendix 4 for the simple reason that it is not required (or even useful) to deliver this plan. Para 16.59 also gives the impression that this scheme is far more likely that it is. We do not consider there is any reason to include it in the Leicester plan so the second part of Para 16.59 should simply be deleted.

Para 16.60 – Although the last sentence of para refers to "an analysis of opportunities to maximise sustainable transport solutions" it seems very likely that the Strategic Transport Assessment has so far failed to embrace this fully or the realities of climate change, future funding constraints or the need to reduce travel more generally.

Para 16.61 – With regard to transport assessment and modelling referred to in para, the experience of Charnwood Borough Council is not enormously encouraging. Various outputs of a seemingly extensive modelling process, carried out for the Charnwood Local Plan, have led the three Highway Authorities to propose numerous highway projects that are intended to increase road capacity to mitigate some congestion. It was claimed that all of these were essential to mitigate the impact of proposed development, including the four strategic sites within the city. There is now no prospect of the funding required for these projects.

An argument was also put forward that without these projects traffic will be displaced onto lower standard roads. The purpose of this is clearly to bolster up the claim for the preferred approach regardless of whether it can be funded or is contrary to the need to mitigate climate change.

The use of modelling is extremely questionable as it relies on assumptions based on previous behaviour. If we a serious about mitigating climate change then we are going to need to be radical. We need to forget modelling and just decide how to mitigate climate change and reduce travel and get on with making it happen.

#### Conclusion

Although there are brief references to sustainable transport, there is a much stronger focus on provision highway infrastructure that increases road capacity.

The observations above also refer to the lack of effectiveness of 'improvements' to road capacity.		
We have outlined in our other representations why we consider that the plan needs to prioritise the reduction of travel to mitigate climate change and reduce congestion and made suggestions regarding modifications. We have also set down our objection to reliance on the SGP. Rewording is required including to para 16.59:		
"Strategically, major infrastructure improvements have previously been identified within the Midlands Connect Strategy, which includes the A46 improvements in the Syston area and M1 improvements to Leicester Western Bypass. We will review these to assess how much they remain consistent with achieving net zero carbon emissions, and whether they will help ease congestion and support future growth (rest of para deleted)"		
Plan needs to be more robust in identifying locations and what partnership working is required to fulfil the infrastructure required. (Para 73 rep)	267 (Leicestershire County Council)	Council is working with Leicestershire County Council on a Statement of Common Ground to address these matters.
Paras 18.4 & 18.5 – Wording should be strengthened with regards to North and South East Leicester as specific areas where cross boundary infrastructure will apply. (Para 36 rep)	267 (Leicestershire County Council)	Council is working with Leicestershire County Council on a Statement of Common Ground to address these matters
Para 18.5 - Reference to the 'Leicester Urban Area' be amended to 'wider Housing Market Area.' (Para 61 rep)	267 (Leicestershire County Council)	Council is working with Leicestershire County Council on a Statement of Common Ground to address these matters.
		Housing Market Area comprises of Leicester and Leicestershire which will be addressed through individual

		local plans in respective areas. The Local Plan refers to infrastructure requirement within the Leicester Urban Area which consists of Leicester City and adjoining settlements / areas described in para 2.2 of the Local Plan.
CEG welcomes the commitment from Leicester Council in paragraph 18.4 to work with its neighbouring authorities on needs arising from growth and development of sites beyond the City boundary and the need for cross-boundary co-operation to deliver interdependent infrastructure. CEG supports this recognition and highlights the need for cross-boundary working (as mentioned above) to ensure that the provision of infrastructure meets requirements of development across the HMA.	318 (Lichfields on behalf of CEG)	Support welcomed and noted.
Policy DI01 - Developer Contributions and Infrastructure		
Include specific references to seeking contributions towards the North of Leicester Transport Strategy and SE Leicester Transport study.	267 (Leicestershire County Council)	Council is working with Leicestershire County Council on a Statement of Common Ground to address these matters
The policy states that any consideration of viability will be in accordance with the guidance. The policy needs to be clearer about which exact guidance is being referred to. Para 18.6 recognises the importance of viability to the plan making process and refers to the whole plan viability assessment that was prepared in support of this Plan. Para 12.74 of the Whole Plan Viability Assessment (including CIL- Refresh- May 2022 notes that viability testing results 'do give rise to some concerns about the delivery of some types of site'. This is likely to result in the need for site specific viability to be undertaken in some instances, and the policy should allow for this.	316 (Home Builders Federation)	Viability of small sites has been considered as part of sites assessment considering any constraints, mitigations and engagement with the landowners. Private strategic sites viability is being picked up with promoters through either Statements of Common Grounds.

CEG are aware that strategic transport work is ongoing, and we reserve the right to comment further on this policy if additional evidence from this work by the City Council, Charnwood Borough Council and/or Leicestershire County Council supports changes to the cross-boundary approach in the Leicester Urban Area.	318 (Lichfields on behalf of CEG)	The council acknowledges this point.
Policy DI02 – Electronic Communications		
-No comments-		

## Chapter 19 - Neighbourhood Planning

Comments from: 316

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response
Para 21 of the NPPF states that plans should make explicit which policies are strategic policies. These should be limited to those necessary to address the strategic priorities of the area (and any relevant cross-boundary issues), to provide a clear starting point for any non-strategic policies that are needed. Strategic policies should not extend to detailed matters that are more appropriately dealt with through neighbourhood plans or other non-strategic policies.	316 (Home Builders Federation)	Council will provide clarity around what are strategic and non-strategic policies during the examination
Although Table 9 lists 22 policies that do not need to be taken into account when preparing Neighbourhood Plans. The HBF suggest that a new Appendix is included in Local Plan, which identifies strategic and non-strategic policies.		

### Chapter 21 – Monitoring

Comments from: 315, 331

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response
Recommend the inclusion of a trigger policy for the review of the Local Plan. Turning to the proposed plan period, it is recognised that the current end date of 2036 will not meet the requirements of the Framework paragraph 22 for local plans to cover a minimum 15-year period from the point of their adoption.	315 (Gladman Developments Limited)	The plan period has been addressed within the housing topic paper.
The unmet need should be addressed as a matter of urgency, and it is therefore crucial for housing delivery to be kept under close review and monitoring. The policy should set out what would happen if the monitoring set out in Chapter 21 of the Plan, identifies that the housing delivery within the Leicester City Area, and that required to be planned for and provided in other local authorities, is not being delivered.		Any shortfall identified within monitoring will trigger a plan review.
Would be helpful to set out which policies support the implementation of each objective of the local plan, targets set, output indicators and source of document which will monitor it.	331 (David Bill (former councillor H&BBC)	The plan has a monitoring framework included in the plan. The council would consider providing further clarification on this at the examination.

#### Miscellaneous & Appendices

Comments from: 17, 34, 41, 43, 77, 78, 61, 109, 117, 119, 121, 133, 149, 153, 210, 238, 241, 242, 267 (Leicestershire County Council), 268 (NHS Leicester, Leicestershire & Rutland Integrated Care Board (ICB)), 282 (Harborough District Council), 290, 295 (The Environment Agency), 297, 300 (Historic England), 305, 306, 309, 316, 318, 331, 339, 353, 440, 441, 442, 443, 444, 445, 452, 453, 455, 456, 457, 458, 459, 497

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response
Issues Relating to Appendix 1 - Housing Trajectory: September 2022		
The trajectory included at Appendix 1 is incomplete as it does not clearly specify the plan period and does not look at the Council's proposed provision against its reduced target of 1,296 homes a year over the plan period. It does not allow a consideration of whether a five-year supply of housing will be maintained over the plan period against this annual target. The trajectory does not provide sufficient detail, merely presenting a summary of expected delivery from broad sources of supply. The enable proper scrutiny of the assumptions the trajectory should include a site-by-site assessment of delivery over the plan period. Revised trajectory proposed as part of representation. Trajectory assumes delivery from CDA sites at a standard 449 dwellings a year. This source of supply cannot meet the tests of deliverability in the NPPF and should therefore not be included in the five-year supply allowance for the first five years of the plan. As part of our response to Policy SLO1 we have argued that the plan period should be extended to 2039 reduced to no more than 2,000 dwellings. These changes would require further revisions to the trajectory at Appendix 1.	290 Pegasus on behalf of Developer Consortium including David Wilson Homes, East Midlands, Bloor Homes East Midlands, Davidsons Developments, Hallam Land Management, Harworth Estates, Jelson Homes, L and Q, Redrow Homes, Vistry Group and William Davis Limited	This is being produced in detail and will be made available as an updated Examination document.
To ensure that the 5YLS and housing delivery over the plan period are fully justified, more information is required. This table should be supplemented with a detailed site by site breakdown	316 Home Builders Federation	Since the council has declared unmet need, we have included the 5YHLS scenarios on adoption in the SHELAA evidence base (EB/HO/3) which was published at Reg 19.

		Detailed trajectory is being produced in detail and will be made available as an updated Examination document.
Reserve the right to review and comment on further iterations of this table, and/or the trajectory, either in writing or verbally in future examination sessions.	318 Lichfields on behalf of CEG	Any further iterations will be made available during the examination process where needed.
Issues Relating to Appendix 2: Heritage Local Lists		
-No comments-		
Issues Relating to Appendix 3: Retail Hierarchy and Neighbourhood Parades		
-No Comments-		
Issues Relating to Appendix 4 - Infrastructure List		
Concern over traffic density created by Beaumont Leys project (see p297). P297 We are not convinced that signalisation of the A563 Krefield Way/Red Hill Way / Beaumont Leys Lane roundabout in anticipation of the Beaumont Park development will assist much without additional lanes around the roundabout. Believe that the new signalisation of the roundabout mentioned above will only be effective if Krefield and Glenfrith Way/New Parks Way were also widened.	324 Local Resident	This will be addressed at planning application stage.
Issues Relating to Appendix 5: How policies will be delivered		
-No Comments-		
Issues Relating to Appendix 6 - Housing Site Allocations (Non-strategic)		
Not clear how the historic environment been fully considered to sites in Appendix 6. Unclear how the site allocations meet the requirements of policies HE01, HE02 and Ho01.	300 (Historic England)	Historic environment has been considered as part of sites assessments (including the Sustainability Assessment) and mitigations. Heritage policies to be considered

		alongside site allocations once the plan is adopted. This has been addressed in individual sites representations.
Issues Relating to Appendix 7: Glossary		
-No Comments-		
Representations with no comments		
Ticked unsound	242 Local Resident	
Other Comments		
Thurcaston and Cropston Parish Plan of 2016 appears to have had no consideration and there are no references to this plan in this set of documents. That plan made it clear that on the basis of the assessments made at that time there was no need for extra housing in Thurcaston for the foreseeable future and none the less within the timeframe projected within that plan.	17 Local Resident	Thurcaston and Cropston sit outside the city boundary. The site in question lies within the city boundary. Detailed master planning will address matters around buffers and boundaries.
Plan should make greater reference to COVID-19 pandemic and its after effects.	267 (Leicestershire County Council)	At the time of preparation, not enough evidence was known on the after effects of the COVID-19 pandemic.
Within the evidence list on Page 167, Cycle Infrastructure Design should be listed (LTN 1/20).	267 (Leicestershire County Council)	City council is satisfied that the documents currently listed are sufficient
Feel the Local Plan has taken into account comments at the earlier consultation stage.	268 (NHS Leicester, Leicestershire & Rutland Integrated Care Board (ICB))	The council welcomes this support.

Plan should specify clearly that the Leicester and Leicestershire Strategic Growth Plan is a non-statutory plan and that it is for individual local authorities to consider the SPG in preparing their local plans	282 (Harborough District Council)	The council can suggest a minor modification to reflect that.
Housing and nature needs should be balanced.	353 Leicester Green Party	It is the view of the Council that this is balanced.
Supportive of the Plan	295 (The Environment Agency)	Welcomed
Alternative funding streams to bring forward sites, especially in the Central Development Area, should be reviewed to reduce the risks of lower delivery in the early years of the Plan.	331 (Cllr David Bill from Hinckley and Bosworth Borough Council)	The Council believes that the policy is strong enough as it is.
Suggest adding as below:		
The Council will consider, if necessary, a more active intervention to deliver development sites and regeneration opportunities in the Local Plan, if sites are not brought forward or if there are delays due to ownership issues or if there are ransom concerns. This includes the use of Compulsory Purchase Orders if appropriate		
Structure of the Plan		
Reading the plan as a whole could be included, i.e., policies interrelated. Each page could have a footnote to that effect as well.	331 (Cllr David Bill from Hinckley and Bosworth Borough Council)	The policies have been cross- referenced within the Plan.
The strategic context /background could be factored into the narrative behind the priorities, objectives, targets. These could start each chapter. This is considered to improve legibility and coherence of the document.	331 (Cllr David Bill from Hinckley and Bosworth Borough Council)	This will be expanded in Plan review.
Some of thematic strategic policy chapters could also appear higher up in the document and could preface the spatial policies.	331 (Cllr David Bill from Hinckley and Bosworth Borough Council)	Will be considered in Plan review.

#### Evidence Base, Supporting Documents & Policies Map

Comments from: 43, 54, 68, 108, 109, 115, 128, 148, 226, 239, 258, 267 (Leicestershire County Council), 268 (NHS Leicester, Leicestershire & Rutland Integrated Care Board (ICB)), 279, 333 (Hinckley & Bosworth Borough Council)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council Response
Supporting evidence and documents – useful to have these embedded in the document for ease of the reader to find them.	267 (Leicestershire County Council)	This can be considered as minor mod to provide links
Advised that it would be beneficial to make reference to Leicester's Care, Health and Wellbeing Strategy 2022-2027.	268 (NHS Leicester, Leicestershire & Rutland Integrated Care Board (ICB))	Council is satisfied that the current evidence base is sufficient
The "Leicester Waste and Minerals Local Plan" is not available and therefore the addition of SL02 site should not be considered until that document is made available. Make available the "Leicester Waste and Minerals Local Plan" so that residents can make an informed choice of support or not for this late addition to the Local Plan and utilise existing waste management facilities in Leicester with more than sufficient capacity for the processing and recycling of waste for the period up to 2036.	108, 148 Local residents	Adopted Waste and Minerals plan is available on the Council's website, the emerging Waste and Minerals plan is still in preparation
Environmental impact assessment not available in evidence base.	109 Mowmacre Young Peoples Play & Development Assoc.	Environmental Impact Assessments are submitted and bespoke to each planning application, and are not used in the Plan making process
Issues Relating to Policies Map		
Maps could be expected to provide indication of more active intervention in the interest of transparency, e.g., where building lines may be changed significantly and/or land safeguarded to carry out comprehensive master planning or provide new highways.	333 (Hinckley & Bosworth Borough Council)	These issues will be considered as part of any future guidance and master planning
Policies SL03, SL04 and SL05 not marked on policies map. SL06 marked as SL05 on interactive map.	68 Local Resident	These can be updated on the policies map.

		SL06 to be updated on interactive map.
Issues Relating to the Sustainability Assessment Report (2022)		
Sustainability Appraisal does not mention climate emergency, nothing to show how development can help reduce climate change. The 2022 Sustainability Appraisal (SA) noted (p4) that the draft Plan said nothing about the climate emergency even though the city council had declared a climate emergency in 2019. It also noted that very little was said about how development could help to reduce climate change. It referred to the addition of a new climate change chapter in the submitted Plan. However, this concentrates on the energy efficiency of buildings. It ignores many important aspects including development location, form and travel which have major implications for climate change. There is nothing to show that the SA has influenced the submitted Plan to take a more robust approach to climate change mitigation.	226 Local Resident	To be dealt with in chapter 6 of the Plan, plan is limited in scope. Sustainability Appraisal includes robust and proportionate assessment of the Plan and policies.
Tables 1.2 and 6.1 have simplistic criteria and conflicting policies on climate change and development of greenfield. The SA notes (p54) that the significant housing and employment development supported by the Local Plan objectives will have negative impacts on environmental factors. These include the development of greenfield land and vehicle movements. It suggests the conflict between policies dealing with matters like climate change could affect land deliverability. It states that such conflicts are "part and parcel" of planning for future development and cannot be easily solved. No-one is pretending it is easy, but the simple cop-out taken by the Plan is to propose low density development on greenfield sites, mostly in Green Wedges, and ignore the implications.	226 Local Resident	SA does not make decision, it broadly informs sustainability of the sites, which can be done using the criteria. This has been done for the sites assessments to be consistent in approach.
The SA Site Appraisal process (Table 1.2) and the Site Appraisals (Table 6.1) is flawed. The selected categories are simplistic, and the criteria shown in Table 4.6 to derive the RAG ratings are in many respects nonsensical. For example, distances are measured in straight lines without considering: - • the importance and frequency of the journey; • the likely mode of travel or the alternatives or how they could change; • the availability, attraction and suitability of alternative		

destinations. Proximity to a primary school or a suitable job is completely different to a water body or a SSSI		
Does not take account of home working as a result of COVID-19 pandemic, no information on infrastructure will be sought for site.	226 Local Resident	SA does not cover such issues. Insufficient evidence is available regarding the after effect of COVID-19 pandemic.
Appendix D - page 5 - Statement about health not balanced. The "Appendix D. Detailed Appraisal of Local Plan policies" document (page 5) states the following about improving health and reducing health inequalities: "Would deliver new homes which are good for health; but negatively affect a Green Wedge and Local Wildlife Site". The removal of a Green Wedge such as the former Western Park Golf Course would have a strongly negative effect on the health of local people.	54 Local Resident	Criterion 12 on transport relates to health effects of transport. Criterion 11 regarding land use acknowledges the site as greenfield and links to health impacts. Criterion 2 acknowledges that new housing helps to reduce overcrowding and is often of higher energy efficiency than older housing thus improving people's health and notes the negative impacts of greenfield development on health.
Issues Relating to the Monitoring Framework (2022)		
The Monitoring Framework is currently saved in the evidence base. HIA report recommended the incorporation of monitoring framework into the Local Plan. This would also add to the overall effectiveness of the Plan as the performance of policies can be monitored over time should it be necessary to trigger an early partial/full review.	333 (Hinckley & Bosworth Borough Council)	The Council will be looking to revise the monitoring framework as part of the examination.
The framework would normally include baselines, targets, output indicators, the source/age of relevant background documentation and the party/parties leading on the actions. This should be considered alongside the monitoring indicators within the SA to ensure alignment with the SEA Regulations.	333 (Hinckley & Bosworth Borough Council)	The Council will be looking to revise the monitoring framework as part of the examination.

Issues Relating to the Health Impact Assessment (2022)		
Assessment was limited by COVID-19 pandemic restrictions. Limitation of the Health Impact Assessment due to Covid restrictions, was that the stake holder engagement was not conducted. The Health Impact Assessment also states that the local plan should not widen health inequalities. Mental health, fitness and general wellbeing for all the local community will be massively impacted by the loss of the recreation ground, the green on Brent Knowle Gardens. The danger of the impact of even more traffic on already overcrowded roads not only raise safety and environmental concerns but will have a huge impact on all local residents. Removal of green spaces in itself increases health inequality.	43 Local Resident	The Council proceeded with this in Covid and carried out consultation in relation to the Statement of Community Involvement Addendum (SD/11).
Paragraph 1.10 unsound as no public involvement. Health Impact Assessment (2022)" carried out was "less comprehensive than guidance recommends due to a delay with the COVID 19 pandemic. The executive summary indicates that there has been no public involvement in the PHIA so paragraph 1.10 is unsound and should be modified to state as much.	115 Local Resident	Public involvement was carried out in line with the Council's adopted SCI.
The PHIA does not delve into specific health impacts of the Strategic sites (policies SL02 to SL06) but the referenced paragraphs and policies in section 7 of the plan state that a HIA is required for all major developments where the number of homes exceeds 150 and/or the area of industrial usage exceeds 5ha or there is a Waste development. All 3 of these apply to site 702 policy SL02. The HIA should be "at the earliest stage possible " and any that are submitted will be "quality assured by the council's public health team".		Health Impact Assessments will be required at planning application stage.
The HIA was completed in Feb 2022 meaning it was not available as part of the Reg 18 consultation from Sep-Dec 2020. Gunning Principles on public consultation states that relevant information should be presented to allow for an intelligent and informed decision. Without the HIA being published during the 2020 public consultation, it would not have been	128, 239 Local Residents	The Health Impact Assessment is a supporting document (non-statutory)

possible for the average person to understand how the housing developments will impact their health.		
Acknowledged that Public Health Impact Assessment (PHIA) has been undertaken as part of public consultation on the plan, however disappointed that stakeholder engagement on the HIA itself was not undertaken.	267 (Leicestershire County Council)	The Health Impact Assessment is a non-statutory document which was duly consulted at Reg 19 as part of the statutory local plan consultation.
Issues Relating to Open Space, Sport and Recreation Report (2017)		
Report mentions graffiti and fly tipping on site 687 which is untrue.	109 (Mowmacre Young Peoples Play & Development Association).	The study will be updated as part of Plan review.
Issues Relating to Equality Impact Assessment (2022)		
Page 9 in The Equality Impact Assessment states that "only a few participants stated that they have a disability". This evidences that the consultation was not inclusive to all residents.	239 Local Resident	Groups with protected characteristics were engaged throughout the process.
Issues Relating to Green Wedge Review (2017) and Addendum (2020)		
Green Wedge Review is quite dated. Question robustness of evidence as status of parcels in green wedges may have changed owing to planning applications since 2017 which have not been captured in the evidence. Also mention about methodology that is now 12 years old however do not consider this is as age sensitive as the review, are content that methodology, which is shared with other Leicestershire authorities, remains pertinent.	258 (Stantec on behalf of The Co- operative Group)	The review was updated in 2020 and the evidence is proportionate. The evidence will be updated as part of plan review after adoption.
Welcome Green Wedge Review Addendum 2020 which provides an update to development pressures facing each of the Green Wedges whilst again scoring them on their function.	258 (Stantec on behalf of The Co- operative Group)	Support welcomed and noted.
Issues relating to How can the infrastructure to support growth in the Local Plan be delivered? (2020) and Infrastructure Update (2023)		

	1	
Lack of information regarding how the development industry will be relied upon to deliver funding.	258 (Stantec on behalf of The Co- operative Group)	Council has produced viability evidence which sets £2,500
Infrastructure list provides no clarity on where these funds are to come from, or whether it is the development industry that will bear the financial burden of this.		per residential unit for developer contributions. Council will also work with
This has a direct impact on both the viability of individual development sites, as well as the Plan as a whole, and it is unclear whether this has been factored into the viability assessment of the Plan.		national government to secure funding for major infrastructure.
It is essential that clarity is provided in this respect to provide developers, and other stakeholders, with more certainty on what is to be expected. This has the potential to hinder otherwise sustainable developments from coming forward, and in the current climate of pressing housing need, the Council should ensure it provides this additional information as soon as possible. Whilst it is noted that the Council indicates that an SPD will be prepared to provide further information in relation to infrastructure provision, it is considered that this information should be provided at this stage, rather than after the Plan is adopted, in order to ensure that viability can be properly analysed. Notwithstanding the above, our client welcomes that the Council has published an updated Infrastructure Assessment, dated January 2023. This is also largely silent on the expectations of the development industry to provide these funds.		
Issues Relating to SHELAA (2022)		
SHELAA updated when new NPPF is published.	258 (Stantec on behalf of The Co-	The SHELAA will be updated in
SHELAA forms an appropriate basis for the Plan, however this should be updated an updated for robustness and soundness when the NPPF is updated.	operative Group)	due course in compliance with the Government guidance.
Issues relating to Transport Infrastructure Assessment (2022)		
Lack of information regarding how the development industry will be relied upon to deliver funding.	258 (Stantec on behalf of The Co- operative Group)	Council has produced viability evidence which sets £2,500
Transport Infrastructure Assessment (TIA) addendum serves as an update to the TIA which was prepared as part of the earlier versions of the Local Plan. These		per residential unit for developer contributions. Council will also work with national government to

<ul> <li>updates are welcomed as this represents an appropriate and robust evidence base for the Local Plan.</li> <li>However, a degree of uncertainty as to the funding of infrastructure, and where this funding will come from. Whilst the TIA addendum only focusses on transport infrastructure, it provides figures for funds that are already committed, as well as those that are required. In short, the TIA addendum confirms that whilst a total of £197.25m has been secured towards funding for transport infrastructure through the Plan period, a further £390.45m remains to be secured (including the purchase of electric busses).</li> </ul>		secure funding for major infrastructure. Further guidance will be produced on Developer Contributions.
Lack of detail provides a great deal of uncertainty for developers who need at least an indication of such costs up front, so that it can be factored into viability calculations and ensure that development sites can come forward, without being unduly stalled by site-specific viability negotiations during the planning application process. The Plan's evidence base needs to provide more certainty in relation to viability in order to conclude that the Plan can delivery the development growth and supporting infrastructure that it proposes.		
Plan would benefit from additional clarity and confirmation from the Council in this respect.		
Issues relating to Leicester and Leicestershire Strategic Growth Plan		
Strategic Growth Plan is out of date.	279 Campaign to Protect Rural England - Leicestershire	The Strategic Growth Plan is not a statutory plan but provides a useful starting point for joined up planning across the Leicestershire HMA. The Plan is also be reviewed jointly by the Leicester and Leicestershire authorities.
Strategic Growth Plan has paid little attention to climate change or biodiversity and landscape issues.	279 Campaign to Protect Rural England - Leicestershire	The Strategic Growth Plan is not a matter for this Examination. All plans within Leicester and Leicestershire

		are required to be in general alignment the SGP which will be reviewed and updated. That will inform any new iterations of the plan. It is expected that the Local Plan will align with the Strategic Growth Plan and address these issues in further detail.
Strategic Growth Plan places too much reliance on strategic growth areas and aligning employment land and housing.	279 Campaign to Protect Rural England - Leicestershire	<ul> <li>The Strategic Growth Plan is not a matter for this</li> <li>Examination. All plans within</li> <li>Leicester and Leicestershire</li> <li>are required to be in general</li> <li>alignment the SGP which will</li> <li>be reviewed and updated.</li> <li>That will inform any new</li> <li>iterations of the plan.</li> <li>It is expected that the Local</li> <li>Plan will align with the</li> <li>Strategic Growth Plan and</li> <li>address these issues in further</li> <li>detail.</li> </ul>

#### Non-strategic site allocations

## <u>Site 15 – Land to south of St Augustine Road/West of Duns Lane</u>

Comments from: 63 (Turley on behalf of De Montfort University), 249 (petition from tenants of Westbridge Industrial Estate), 300 (Historic England)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Petition of 8 signatures from businesses that development does not take any existing businesses into account; therefore, site allocation is not justified. Does not comply with NPPF para 155.	249 (petition from tenants of Westbridge Industrial Estate)	NPPF para 155 refers to renewable and low carbon energy which is not directly relevant to the objection. The non-strategic site allocations document (p.5, SD/19) expects that neighbouring uses should be considered within the development and would be considered as part of policy DQP06 'Residential amenity'. Responses from tenants were considered as part of the site allocation through previous consultations and preparation of the final Local Plan.
University has land interest in this site. Policy Ho01 is considered unsound as there is no evidence that this is justified, The Site Allocations Document does not consider the existing land uses that surround the proposed allocations. Therefore, part (e) of the Policy above should be updated to state: "Respect the character of the area in compliance with the surrounding land uses, and the environmental, design, amenity (DQP06), and heritage policies in the Local Plan".	63 (Turley on behalf of De Montfort University)	The Council welcomes the land interest and will provide planning advice for any schemes coming forward. The non-strategic site allocations document (p.5, SD/19) expects that neighbouring uses should be considered as part of the site analysis and alongside design policy (Chapter 8). Therefore, it is the Council's belief that this should be sufficient to address this point. However, further detail can be provided where necessary in the policy if required.

It is not clear how any impact on the Castle Conservation Area to the west has been considered or the SM on the opposite side of the river. It is not clear how this will stitch in with the aspirations of the Riverside SPD. Furthermore, there is non designated archaeology at the site and its surrounds including 19th century industrial heritage, railway terminus, canal network and a Medieval Friary, Iron Age and Roman settlement and cemetery. There is the potential for Palaeo environmental archaeology due to its riverside location. Should the site be pursued within the Plan an appropriate scheme of archaeological assessment and archaeological assessment to inform proposals would be required.	300 (Historic England)	The Council have assessed the Conservation Area, archaeology and scheduled monument as part of heritage and archaeology constraints on the sites. The Council would expect any development coming forward to consider all heritage constraints. The non-strategic site allocations document (p.5, SD/19) outlines the suggested mitigations on the site. Archaeological assessments and Heritage Impact Assessments will be required as part of the planning application process in accordance with policies HE01 and HE02.
		policies HE01 and HE02.

Site 19 – Velodrome Saffron Lane

-No comments received on this site-

# <u>Site 190 – Lanesborough Road - former allotments</u>

Comments from: 284

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Objection to site allocation as the site has been designed with the main access point from the corner of 21 & 25 Lanesborough Road. There is very little separation between the bungalow at number 21. Concerns that vehicles going in and out will contribute excessive noise and headlights turning into the access. Concerns over how parking would be stopped on access road. Suggestion made that a noise and sound reduction safety barrier could be made on the corner of the access toad and replacement of council walls near site. Should have consideration for disabilities and reduced quality of life created by development	284 (Local resident)	The site has already received planning permission under application reference number 20200789. Conditions as part of this planning application consider amenity of local residents including parking near the site and noise/light issues. This is also expected as part of future policy 'DQP06: Residential amenity' which will be used upon adoption of the plan.

# Site 219 – Land rear of Rosedale Avenue/Harrison Road allotments

-No comments received on this site-

# <u>Site 222 – Evington Valley Road (former Dunlop Works)</u>

Comments from: 98 (Madani Schools Federation), 142, 300 (Historic England), 335, 341, 347, 510

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Deeply concerned about how the impact this proposed site development will have on our students and the broader school community. Concerned that the lack of greenspace or appropriate playing fields will impact our ability to deliver a broad and balanced curriculum, and the absence of hygiene, medical, or changing facilities on current fields provided is a significant concern. Concerned about the current and future safety of pedestrians, students, cyclists, and vehicles in the area that have not been fully addressed. The existing dangerous congestion, travel conditions, and lack of capacity in the immediate and surrounding area make it difficult to see how any further development can be safely accommodated. Local plan is not legally compliant as fails to consider the needs of schools and broader school community. Suggestion for example, that there is a fair allocation of green space and playing fields that meet the needs of all students in the area	98 (Madani Schools Federation)	The Council would expect that any scheme coming forward will consider the suggested mitigations in the non-strategic site allocations document (p.11, SD/19) within the design at planning application stage. The Local Plan does carry forward the existing standard of 2.88 ha of publicly accessible open space per 1,000 population (para. 14.15 of Local Plan). This development is on brownfield land and so would not have impacts to existing green space provision. The Council have considered all previous representations in final allocation of the site.
The proposal on site 222 doesn't take into consideration the legal duty of children at the current Madani school not having sufficient greenspace or appropriate playing fields at the school that fairly and legally meets the needs of the pupils. Opportunity to develop the former Dunlop site to increase education provision to make it equitable to all other areas of the city. No consideration has been given from local school or families of pupils attending those schools in close proximity of the proposed site, so recommend that this is extended consultation for collaborative feedback	142 (Local resident)	The Local Plan does carry forward the existing standard of 2.88 ha of publicly accessible open space per 1,000 population (para. 14.15 of Local Plan). Site letters were sent out to nearby properties, including the school, during each of the consultations which invited comments

		on the site. Site notices were also put up as per the Council's adopted Statement of Community Involvement (SD/11).
The plan does not provide equitable provision for secondary school. The conversion of the site will contribute additional pollution from motor vehicles which will have negative impacts on health of children. Additional traffic will also add further congestion, increase the risk of road traffic accidents to the local community. Concerned with the lack of green space/appropriate playing fields for the school that fairly and legally meets the needs of all students and the breadth of the national curriculum, the students currently have no hygiene, medical or changing facilities. Only come across the consultation by chance.	510 (Local resident)	The Council would expect that any scheme coming forward will consider the suggested mitigations in the non-strategic site allocations document (p.11, SD/19) within the design. This includes congestion, access to green space and playing fields. The Local Plan does carry forward the existing standard of 2.88 ha of publicly accessible open space per 1,000 population (para. 14.15 of Local Plan). Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Site notices were put up at each stage and neighbours notified.
Plan is unsound for the following reasons. These will contribute to congestion traffic, carbon emissions and noise to an already congested area, with concerns over associated safety. Plan will be an eyesore and does not improve the environment compared to the open space and greenery which should be an alternative. Children at the school do not have sufficient places and facilities which has impacts to physical, mental health and wellbeing. Children should have equitable provision to others in the city. Concerned that School has not had proper consideration, consultation or dialogue from the LA despite repeated attempts by the school. Concerned about the future and futureproofing of faith schools. It is absolutely wrong that the local authority has not considered the lack of greenspace or appropriate playing fields for the schools that fairly and legally meets the needs of all students and the breadth of the national curriculum.	335 (Local resident), 341 (Local resident), 347 Local resident)	The Council would expect that any scheme coming forward will consider the suggested mitigations in the non-strategic site allocations document (p.11, SD/19) within the design. This includes factors such as traffic, carbon emissions, impacts to the environment. The council have undertaken a proportionate approach to site selection based on the assessment of all constraints including open spaces and access to different

		facilities/services. This is outlined further in the housing and sites topic paper (TP/5).
Not clear how setting of Grade II Listed Buildings to the north-west of the site has been considered. Development would need to be appropriate in design, scale, massing and materials. There is the potential for impact from the cumulative impact with site 505 which will also require further assessment.	300 (Historic England)	The Council have assessed the Grade II listed buildings as part of heritage and archaeology constraints on the sites. The Council would expect any development coming forward to consider all heritage constraints. The non- strategic site allocations document (p.11, SD/19) outlines the suggested mitigations on the site. Archaeological assessments and Heritage Impact Assessments will be required as part of the planning application process in accordance with policies HE01 and HE02. This is expected to take account of any nearby sites including site 505.

Site 240 - 114-116 Western Road

-No comments received on this site-

Site 297 - Sturdee Road - The Exchange

-No comments received on this site-

### Site 307 - Mary Gee Houses - 101-107 Ratcliffe Road

Comments from: 159 (Gladman Retirement Living Ltd), 300 (Historic England), 496 (Stoneygate Conservation Area Society), 501

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Unclear why the site has been reduced from 100 dwellings to 40 dwellings. Given the current capacity of the site, and its size and layout, and shortage of land in the City Boundaries, it could easily support more than 40 dwellings given appropriate design. This is one of the few sites with only 1 red result in RAG assessment. This is for distance to train station, however this is addressed by public transport access via other means. The Stoneygate Conservation Area appraisal acknowledges that the site would be suitable for redevelopment as it fails to make a positive contribution to the significance of the conservation area. The site is well suited to re-development for general needs housing but also for specialist accommodation for the elderly as it is sustainably located, as noted in the RAG assessment for the site. It is confirmed that this site would be built out within the first 5 years of the plan period.	159 (Gladman Retirement Living Ltd)	<ul> <li>This has been reduced to minimum of 35dph due to the planning application refusal for 100 dwellings and to maintain minimum densities outlined in policy Ho05.</li> <li>The support from Gladman Retirement Ltd to develop the site is welcomed and the Council will continue to work with the developer to look to bring this site forward within the first 5 years of the Plan.</li> <li>The 40 dwellings are based on the minimum density of 35dph. This does not preclude a scheme coming forward for a higher density. However, it would be expected that this takes account of the planning constraints and usual planning matters which will be determined by a planning application.</li> </ul>
Proposed allocation of 100 dwellings to this site is excessive. Supportive of development of site but needs to be done sensitively given the close proximity to setting of grade 2 listed buildings. Refusal of 100 dwellings was largely based on poor design and belief that this area is not suited to high density development.	496 (Stoneygate Conservation Area Society)	Site capacity has been reduced to 35dph in line with policy Ho05. The 100 is from a previous planning application that was live at the time of Regulation 18 consultation but has since been refused. Density and design of the planning application will be expected to consider the listed buildings and conservation

		area in line with policy HE01 (Chapter 10), as well as the usual planning considerations.
Unclear how impact on Stoneygate Conservation Area, and Grade II* Inglewood to the south west, have been considered. Development of the site could offer the opportunity to enhance both heritage assets. Historic England has previously commented on applications at the site for a care home.	300 (Historic England)	The Council have assessed the Grade II listed building and Stoneygate CA as part of heritage and archaeology constraints on the sites. The Council would expect any development coming forward to consider all heritage constraints. The non-strategic site allocations document (p.15, SD/19) outlines the suggested mitigations on the site. Heritage Impact Assessments will be required as part of the planning application process in accordance with policy HE01.
Site boundary is incorrect as this includes land that is owned by a neighbour. Please send a written confirmation that the error has been corrected with an amended boundary line.	501 (Local resident)	The Council acknowledges the error with this site boundary. This is a mapping error and will be rectified as part of main modifications in both the non-strategic site allocations document (SD/19), policies map (SD/3) and any other mapping pertaining to the site. This is not expected to have a detrimental impact on housing supply as the amount of land to be removed is very small.

# Site 335 - Manor House Playing Fields – Narborough Road

Comments from: 97, 120, 199 (Sport England), 322 (Oadby & Wigston Borough Council), 509, 511, 514, 516

Main Issues Raised	Rep ID (name of Statutory Consultee or organisation if applicable)	Council's response
<ul> <li>Development does not comply with environmental aims, transport or health issues of city. Reasons include: <ul> <li>Impacts to 2 Local Heritage Assets (Lodge to former Manor house &amp; Tram Shelter South of Haddenham Road)</li> <li>Loss of greenfield site including established native trees impacts to wildlife.</li> <li>Make two busy junctions even busier due to the access/egress of extra vehicles from the new houses.</li> <li>Green spaces are essential for the mental wellbeing of the residents.</li> <li>Decrease air quality, which will adversely affect the health of the local residents, especially the elderly or vulnerable.</li> <li>The road is used by schoolchildren to get to two local schools, the increased traffic will increase the risk of traffic collisions and injury to those children</li> </ul> </li> </ul>	97 (Local resident)	The Council would expect that any scheme coming forward will consider the suggested mitigations in the non-strategic site allocations document (p.16, SD/19) within the design. This includes factors such as impacts to heritage assets, wildlife impacts, air quality, traffic, road safety.
Proposal does not fit with the local heritage assets which are listed in the Local Plan or the environmental vision for the city. Number of mature trees on site that would have to be felled. School have planted a mini forest which is promoting environmental education, building on a greenfield site will contradict this. Extra houses will need vehicular access in area that is already busy and congestion. This will lead to extra traffic and another possible junction. Youth football team played on this area on Sundays until Covid, building will prevent this from being used.	120 (Local resident)	The Council would expect that any scheme coming forward will consider the suggested mitigations in the non-strategic site allocations document (p.16, SD/19) within the design. This includes factors such as impacts to heritage assets, consideration of trees, access, traffic, road safety. Mitigations for loss of playing field will include enhancement of existing playing fields.

No evidence showing playing field can be reduced in size which conflicts with proposed policy OSSR04. Cumulative impacts of playing field loss from previous school expansion. Current Playing Pitch Strategy evidence base is out of date and allocation should be put on hold until the review is complete.	199 (Sport England)	Sport England objection considered, and it is the council's view that this is addressed with as part of the examination. The Council proposes this site for partial development. Suggested enhancements expected on playing field including improved pitch drainage and creation of a changing block with toilet facilities as well as offsite improvement at Braunstone Park. The Council believes that the current Playing Pitch Strategy (EB/OS/4) is sufficient to justify the release of this land for housing development at this current time. However, a review of the Playing Pitch Strategy is being undertaken which
<ul> <li>Negatives of development outweighs the positives. Concerns are: <ul> <li>Safe access to the site for vehicles. Narborough Road is already dangerous and overcrowded.</li> <li>Vehicular access via Compton Road will put school children in danger as this is the main entrance to St. Mary's Fields Primary School</li> <li>Boxing in the school and safeguarding concerns of overlooking properties.</li> <li>Reduces capacity to use land for recreational purposes.</li> <li>Any changes to the landscape will spoil the setting of the Historic Tram Shelter</li> <li>Last space of green in the area</li> <li>Council recently introduced new Article 4 enforcement preventing the development of further HMO's in the area which acknowledges that neighbourhood is already overcrowded.</li> </ul> </li> </ul>	509 (Local resident)	<ul> <li>will be available in due course.</li> <li>The Council would expect that any scheme coming forward will consider the suggested mitigations in the non-strategic site allocations document (p.16, SD/19) within the design. This includes factors such as impacts to heritage assets, access, traffic, road safety, loss of green space. Mitigations for loss of playing field will include enhancement of existing playing fields.</li> <li>The article 4 direction relates to Houses in Multiple Occupancy (Class C4). The Council have established this direction to retain larger housing in the area and prevent an overconcentration of this use</li> </ul>

		in this area. The allocation aims to meet housing needs.
<ul> <li>Objection based on: <ul> <li>Being the last remaining green space in area that is not associated with the nature reserve off Great Central Way</li> <li>Will require another T-Junction onto Narborough Road</li> <li>Damage the setting and appearance of the art deco tram shelter on Narborough Road</li> <li>Some council owned; vacant properties should be addressed to increase the number of dwellings without having to build</li> <li>Council have recently introduced an article 4 to the area to stop the number of HMO's in the area as recognised to be saturated. Does not compute to have proposal on saturated area.</li> <li>Concerns over proposal now would be followed by further proposals, as the amount of land left will be of no use to the sports recreation uses.</li> <li>Development could be pushed onto larger developments to save recreation space.</li> <li>Disruption to learning, travel and air pollution for the 400+ pupils who attend St. Marys Fields Primary School for the duration of the build and afterwards would be tremendous and highly detrimental.</li> </ul> </li> </ul>	511 (Local resident)	The Council would expect that any scheme coming forward will consider the suggested mitigations in the non-strategic site allocations document (p.16, SD/19) within the design. This includes factors such as achieving Biodiversity Net Gain, safe access, impacts to heritage assets, road safety, loss of green space. Mitigations for loss of playing field will include enhancement of existing playing fields. The Council have sought to maximise development on brownfield land where possible, with the majority of this being in the Central Development Area. In order to meet the housing needs, the Council have made tough decisions to allocate green spaces. The article 4 direction relates to Houses in Multiple Occupancy (Class C4). The Council have established this direction to retain larger housing in the area and prevent an overconcentration of C4 use in this area. The allocation aims to meet housing needs.
Objection as there is no safe vehicular access, proximity to the site presents danger to children and parents, boxing in of school could have safeguarding issues, may lead to further HMO's being set up, green space should be left for recreation and aesthetic reasons.	514 (Local resident)	The Council would expect that any scheme coming forward will consider the suggested mitigations in the non-strategic site allocations document (p.16, SD/19) within the design. This includes factors

		such as providing safe access, road safety, loss of green space. Mitigations for loss of playing field will include enhancement of existing playing fields. Article 4 direction to remain in place to restrict HMO's in the area.
Current access to the site could potentially endanger pupils. Access via Narborough Road is on brow of hill and a busy road. The acknowledgement of no further HMOs being allowed from the recent increase of the article 4 area, suggests the area is already congested. Green space has been left to overgrow, little on this side of Narborough Road's play areas, green spaces. Development should consider eco houses, big contributions to transform the Manor house to utilise rooms, contribution to school for security and road safety, enhanced green space with playgrounds, an astroturf/4G facility for local resident use, focus on quality and sustainable impact of development.	516 (Local resident)	The Council would expect that any scheme coming forward will consider the suggested mitigations in the non-strategic site allocations document (p.16, SD/19) within the design. This includes factors such as providing safe access, traffic, road safety, loss of green space. Mitigations for loss of playing field will include enhancement of existing playing fields. The article 4 direction relates to Houses in Multiple Occupancy (Class C4). The Council have established this direction to retain larger housing in the area and prevent an overconcentration of this use in this area. The allocation aims to meet housing needs. Sustainable design and construction policy CCFR01 would be expected to be taken into account within all planning applications which would address the issue of eco homes.

# Site 449 - Allexton Gardens Open Space

-No comments received on this site-

### Site 481 - Brent Knowle Gardens

Comments from: 23, 24, 31, 32, 41, 43, 59, 117, 119, 128, 133, 210, 220, 227, 238, 239, 250, 251, 270, 271, 274, 277, 298, 299, 303, 305, 306, 307, 308, 309, 310, 312, 313, 314, 416, 417, 418, 423, 424, 427, 428, 429, 430, 431, 432, 433, 434, 435, 436, 441, 443, 444, 445, 446, 447, 448, 449, 450, 451, 452, 453, 454, 463, 464, 465, 466, 467, 468, 469, 470, 471, 472, 473, 474, 475, 476, 477, 478, 479, 480, 481, 482, 483, 484, 485, 486, 487, 488, 498 (Residents of Thurncourt), 500 (Children's representations)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Not involved in any part of the planning. We were not told of any meetings nor that there would be any building work taking place here. We have a disabled son, and light/overshadowing plus traffic from the new houses will affect not only his behaviour but also cause his epilepsy to get worse.	23 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Site notices were put up at each stage and neighbours notified.
		Policy DQP01 would be expected to address the design of schemes coming forward, including lighting and overshadowing.
Objection to building new houses as area is a busy residential area with many schools in the locality. The increase of traffic is definitely not needed. There are many houses in the city that have been abandoned that the council could refurbish.	24 (Local resident)	The Council would expect that any scheme coming forward will consider the suggested mitigations in the non-strategic site allocations document (p.19, SD/19) within the design. This includes providing a Transport Assessment to address traffic issues. The existing housing stock has been considered
Objection to building on Brent Knowle Gardens. This space was incorporated	Local residents:	within the housing needs evidence
into the estate when it was built for our recreation and wellbeing. Any new housing development is built with a statutory green space included. We cannot destroy any more green spaces, we need them for our health and wellbeing.	31, 32	The Council would expect that any scheme coming forward will consider the suggested mitigations in the non-strategic site allocations document (p.19, SD/19) within the design. The site is allocated for partial development (half

		of the site) to allow for retention and enhancement of the rest of green space. Partial allocation is in response to the recognised open space deficiency in the ward balanced against the identified need for housing in the city.
Local residents were not consulted in a timely manner, no information was publicly displayed, and many homes did not receive information from the council.	41 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Site notices were put up at each stage including press notices and a leaflet during Regulation 18 consultation. Neighbours adjoining the site were notified.
<ul> <li>First stage of the consultation was not legally compliant as local residents were not properly informed in a timely manner and no information publicly displayed. Many homes did not receive any formal notification from the council at all.</li> <li>Health Impact Assessment limited due to Covid restrictions; stake holder engagement was not conducted. Mental health, fitness and general wellbeing for all the local community will be massively impacted by the loss of the recreation ground, the green on Brent Knowle Gardens, which contradicts the HIA. The danger of the impact of even more traffic on already overcrowded roads not only raise safety and environmental concerns. Removal of green spaces in itself increases health inequality.</li> <li>Impacts to lack of parking places, natural drainage the green provides and the ecological impact on wildlife and the removal of established trees</li> </ul>	43 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Site notices were put up at each stage including press notices and a leaflet during Regulation 18 consultation. Neighbours adjoining the site were notified. A whole plan Health Impact Assessment has been undertaken to assess implications of the whole plan (SD/7) on health goals. Stakeholder engagement was not possible in 2020 due to the diverted resources within the Council as a result of Covid lockdowns. Any planning application coming forward
		would be expected to consider health implications, traffic, parking places, natural drainage, trees, ecological impact in the

		development. This would need to be in accordance with Local Plan policies.
Consultation fundamentally flawed as Plan not legally compliant as many residents were not informed of the plan, no leaflets through the post and not supportive of council website. Policy documents in relation to planning are not easy to find navigate or understand. Questions why the information isn't centralised on each proposed plan.	59 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). A leaflet was sent to all households in city during Regulation 18 consultation. Neighbours adjoining the site were also notified.
<ul> <li>Proposal is unsound on environmental grounds including removal of trees, green space and loss of biodiversity. Green spaces provide clean air to breathe and to combat global warming. Green spaces help to reduce issues around mental health which has been borne out by many social and psychological studies. Land not used for ball games but used extensively for exercise and to meet other residents.</li> <li>Provides the example of Welwyn Garden City which was set up as the principle of green spaces to enhance quality of life for residents. Milton Keynes also allocates 25% of land for parkland or open spaces.</li> <li>Summerlea Road, Wintersdale Road, Brent Knowle Gardens and Valentines Road were built in the 1950s for smaller cars. As the average number of cars</li> </ul>		Links to the documents were all provided via the consultation hub and the Council offered assistance to people where needed. These issues were considered through the site assessment process. Any planning application coming forward would be expected to consider loss of trees, green space, health implications and ecological impact in the development. The Local Plan does carry forward the existing standard of 2.88 ha of publicly accessible open space per 1,000 population (para. 14.15 of Local Plan). The overall housing need and land
per household has increased, the navigation of roads has been more difficult with increased parking on the roads. Congestion is common on surrounding roads. Concerns over the current bus system taking too long to get to the city centre (not 15-minute city). Questions what time of day the site was visited as cars parked or moving through is worse in a morning and evening. Questions where carbon offsetting will come in the neighbourhood and whether materials used will be environmentally neutral. Issues of drainage and sewage and the need for this to be made of sustainable materials.		availability has been applicable in site assessment. The Council would expect that any scheme coming forward will consider the suggested mitigations in the non-strategic site allocations document (p.19, SD/19) within the design. This includes providing a Transport Assessment to address traffic issues.

Concerns that no plans of the proposed housing layout will have impacts to the build quality of the houses and meeting the same sizes.		The use of sustainable materials and drainage and sewage would be expected to meet with climate change policies (Chapter 6) in the Plan. The proposed layout of the houses will be determined during planning application stage and will be expected to meet with the good design policies (Chapter 8)
Effective engagement as per NPPF requirement did not take place. Reference to section 8(c) of the NPPF not being met. SA Appendix B incorrectly describes site as "Mainly amenity grassland of low value, small shrubs/young trees of fairly poor value with some larger trees to SW of moderate ecology." The site has 15 trees, with vast majority being 40-50 years old and has attracted woodpeckers, badgers, bats, birds of prey and ducks. Local Plan does not outline how net biodiversity would be increased. Building on this site does not follow latest Environment Agency research which outlines all the wider benefits of urban green spaces.	220 (Local resident)	The Council believes that the engagement undertaken is in compliance with the NPPF. The Sustainability Appraisal considers these issues amongst a much wider set of criteria including social and economic objectives. Details of Biodiversity Net Gain would be considered at planning application stage. Environment Agency's comments on the Plan have been taken into account.
<ul> <li>Site allocation does not meet Chapter 2, section 9 of the NPPF which specifies that local circumstances should be taken into account. Many factors of Thurncourt ward to justify removing the site from the plan including: <ul> <li>a higher-than-average age population which was not considered in the site assessment. Equality Impact Assessment acknowledges that Thurncourt has a higher-than-average age and correlation of disability rates increasing.</li> <li>Thurncourt has high deprivation rates according to Index of Multiple Deprivation. Research shows that greenspace is needed for health, equality and better mortality rates so should be preserved.</li> <li>Ares of deprivation benefit most from retaining green spaces according to report by Public Health England for improving access to greenspace – A new review for 2020 – Page 25.</li> </ul> </li> </ul>	227 (Local resident)	Site allocations proposed have been assessed from sites submitted through the SHELAA and have been assessed consistently. This includes assessing for local circumstances. It is the Council's view that this is in compliance with the NPPF. The council have undertaken a proportionate approach to site selection based on the assessment of all constraints including open spaces and access to different facilities/services. This is outlined further in the housing and sites topic paper (TP/5). The Sustainability Appraisal conducted further considers wildlife, amongst a much wider set

<ul> <li>Social isolation experienced by residents with disabilities and the elderly would be negatively impacted if the site was built on.</li> <li>Site should consider the wildlife which have not been addressed in the supporting documents.</li> </ul>		of criteria including social and economic objectives.
Costs and benefits do not justify the building of houses on this site. This goes against Chapter 2 Section 11(b) of the NPPF. This is not in keeping with the government's levelling up agenda.		
<ul> <li>Health Impact Assessment (HIA) was not published until February 2022 meaning that residents did not have full information available to make an intelligent and informed decision on the Local Plan. This is against the Sedley/Gunning Principles. HIA paused but consultation went ahead during Covid-19 pandemic. Stakeholder engagement needed on the HIA.</li> <li>Page 9 of Equality Impact Assessment stated that only a few participants stated that they have a disability which shows that this was not inclusive to all residents. Rates of depression rose as a result of the pandemic, not all were able to be involved in the consultation. People who depend on face-to-face contact to learn about developments in their community were socially isolated. Reasonable arrangements were not made for those with distances or higher than average ages who would have been forced to shield during Covid guidelines. Residents protected under section 149 of Equality Act 2010.</li> <li>Online workshops did not take place in 2020.</li> </ul>	239 (Local resident)	A whole plan Health Impact Assessment has been undertaken to assess implications of the whole plan (SD/7) on health goals. Stakeholder engagement was not possible in 2020 due to the diverted resources within the Council as a result of Covid lockdowns. The Equality Impact Assessment has been informed by past data, including census data and past consultations. It is the council's view that this meets with the Equality Act 2010 and available under document SD/5. Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). A leaflet was sent to all households in city during Regulation 18 consultation and online meetings held. This is in compliance with the Sedley/Gunning Principles of consultation.
Objection to the development of housing on green space by residents of Brent Knowle Gardens and Wintersdale Road. Green space incorporated into the estate when it was built for recreation and wellbeing and expected for any new housing development.	Local residents: 250, 251	The Council recognises that this is in an area of open space deficiency. Considering the overall housing need balanced against the need to retain some open space, the Council is allocating this site for development of half of

Green spaces improve air quality, reduce noise, enhance biodiversity, moderate temperatures, provide for wellbeing, erosion control, water quality, flood risk alleviation etc. Important opportunities for social integration including for number of elderly, adult and children with special needs and adults with mental health issues. Site has been subject to a recent surge in scientific investigation.		the site with the rest to be retained and enhanced as open space.
Building a total of 21 houses across two greens will not make a dent on housing numbers but will have a hugely disproportionate effect on the lives of vulnerable Local residents. Risks and impacts have not been properly assessed, those that have been and views of existing residents have been ignored by the Council.	270 (Local resident)	The Council has taken into account all previous representations on the plan and sites contained within. Site assessments have explored potential impacts as accessibility to services, open space provision and road impacts.
Objection due to loss of trees which are a natural habitat for birds, bats. Concerns over traffic which will only increase the number of accidents.	274 (Local resident)	These have been assessed and identified as mitigations to be considered at planning application stage. These will be assessed against policies in Transportation (Chapter 16) and Natural environment (Chapter 15).
Green spaces provided for the community should be cherished and enhanced. Green spaces improve air quality, reduce noise, enhance biodiversity, moderate temperatures, an area of physical exercise and social interaction. Contravenes human rights and the dignity of those that use the green spaces. Disproportionate impact on low-income areas.	277 (Local resident)	The Council recognises that this is in an area of open space deficiency. Considering the overall housing need balanced against the need to retain some open space, the Council is allocating this site for development of half of the site with the rest to be retained and enhanced as open space.
Survey of the land needed, traffic checks, biodiversity considerations and mature trees.	298 (Local resident)	These have been assessed and identified as mitigations to be considered at planning application stage.

Green space is associated with a large number of health benefits. Wildlife, long life expectations. Houses going ahead will increase traffic, air pollution, noise, parking and negative impacts to safety for children going to and from school and loss of play space/green space.	303 (Local resident)	These have been assessed and identified as mitigations to be considered at planning application stage.
Documents difficult to understand and should be changed.	306 (Local resident)	Local Plan documents have been produced as simply as possible given the technical nature of the plan. The council have provided support to people when making representations where requested.
Greenspace is necessary for residents and their children and pets for their safety playing close to their home and more houses mean more traffic dangerous roads	310 (Local resident)	The Council recognises that this is in an area of open space deficiency. Considering the overall housing need balanced against the need to retain some open space, the Council is allocating this site for development of half of the site with the rest to be retained and enhanced as open space.
No evidence of impacts to health, wellbeing and safety of the local community have been considered.	312 (Local resident)	This has been considered as part of site assessment and mitigations. Any planning application is expected to address policies in health and wellbeing chapter (Chapter 7).
Consultation was fundamentally flawed and didn't engage people living in the area, especially people who are vulnerable or have mental or physical health issues. Should be run again. Far greater efforts should be made by the council to engage all residents and to understand the impacts to health, social aspects and safety. Important that green spaces are kept close enough to people's houses that everyone can use them. Dangerous due to all the parked cars and traffic. Air pollution is high and schools, doctors and dentists don't have enough places.	Local residents: 313 & 314	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Groups with protected characteristics were engaged with in consultations on the Plan. Site is proposed for partial development with the rest to be retained and enhanced as open space.
		Matters to do with parking, traffic, air pollution and service capacities have been addressed through site assessments. Further details will

		be further explored through planning applications tested against the policies.
<ul> <li>Plan not sound on environmental grounds and fundamentally flawed as established trees provide oxygen and help with pollution. Roads around too narrow for traffic and will have issues of further congestion. Refuse lorries, delivery vans and emergency vehicles currently struggling along Summerlea and Valentines Road. Parking issues and antisocial behaviour will be caused. Noise pollution and vehicle fumes will have impacts to health. Schools nearby will not benefit from impurified air. Bats in houses which have been seen at night and biodiversity on the site. Concerns over construction causing a lot of destruction, where carbon offset will come from, whether construction tools will be environmentally friendly and devaluing property.</li> <li>The value of green spaces are essential and shouldn't be underestimated. Open space provides safety for children and used daily. Benefits to mental health as a safe haven of tranquillity to residents. The elderly use Brent Knowle Gardens to walk around because they cannot get to a park and this their sanctuary and safe haven.</li> </ul>	Local residents: 416 & 418	The Council expects that any scheme coming forward will consider the suggested mitigations in the non-strategic site allocations document (p.19, SD/19) within the design. This includes factors such as noise, congestion, pollution and parking which will be determined at planning application stage against the policies in the Plan. The Council recognises that this is in a ward of open space deficiency. Considering the overall housing need balanced against the need to retain some locally accessible open space, the Council is allocating half of this site for development with the rest to be retained and enhanced as open space.
The Gardens were gifted to the property holder of the area by Brent Knowle to enhance the landscape and for the wellbeing of the residents.		Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11) and the
Evidently being done without consultation for minimum disruption and the production of a form that is difficult to complete is unfair. No notification about the plans until receiving notification from neighbour in February 2023. No leaflets were dropped around. Not able to read all of the documentation online during the pandemic and socialise about this. Policy documents hard to read. Breaches with transparency and data protection as this information should have been shared for all surrounding roads to ensure areas that will be affected were included. Under the freedom of information act the plans should have been accessible sooner. The consultation was not advertised lawfully.		standard government prescribed form for Local Plan consultation. Leaflets were sent to every household in Leicester in 2020 consultation and documentation that was available was posted on the Council's consultation webpage.
Objection based on loss of trees, mental health, air pollution, environment, traffic, too many cars and safety for children. Green space is a source of	417 (Local resident)	The Council expects that any scheme coming forward will consider the suggested mitigations

pleasure, problems with parking on green. City sprawl is increasing at the sake of the environment.		in the non-strategic site allocations document (p.19, SD/19) within the design. This includes factors such as pollution, loss of trees and road impacts which will be determined at planning application stage against the policies in the Plan.
Consultation was fundamentally flawed as no notification was given of it to people in the surrounding streets. Land was given to the local community by sheriff the builder. Cause an increase in traffic on narrow streets. Children cut through to get to school. Suggestion that the council look at the derelict site of the Mayflower pub to build houses on.	423 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Neighbours have been notified at each consultation stage. Overall traffic impacts have been factored into site assessments and will be further tested during planning application stage. The Mayflower pub has previously received Planning permission for housing and the development of this site is being considered further.
Plan not sound as appears not to have taken into account the views of the Thurncourt ward before a decision was made.	424 (Local resident/Independent researcher)	Previous representations received were considered in site assessment process to arrive at final site allocations.
The Council decision has not considered the exceptional, crucial value of 2 very small Green Spaces on Croyland Green and Brent Knowle Gardens for recreation, health, nature/ wildlife and geographical/ historical 'Sense of Place'. Should not build on the green now or in the future. Unacceptable housing development on limited green spaces. L.C.C. acknowledges that there is an 'open space deficiency' but appears not to equate this with essential 'Green Space' in Thurnby Lodge's Thurncourt Ward. L.C.C. does not appeared to justify why it will destroy approximately 50% of this extremely important green space for the sake of just 9. Other effects will include significantly increased noise, CO2 pollution and further reduced infra-red (heat) reflection.		As stated, the Council recognises the open space deficiency in the ward. The Council have had to make difficult decisions in site allocations given the pressures to develop housing in the city to meet housing needs. In balance of this, the Council is proposing to only develop half of the site with the rest to be retained and enhanced as open space. The Council believes this is a proportionate approach to open space needs.

Repeatedly stated by local residents during ward meeting that L.C.C. previously had not informed Thurncourt Ward / Croyland Green / Homestone Gardens residents adequately/properly or at all of the proposed 'Central Government Initiative'. Ward meeting not a consultation meeting as already made decision. Suggested that a decision to develop was based upon non- consultation or extremely limited information, dissemination to Thurncourt Ward residents. Space valuable to Thurnby Lodge residents and also especially to wildlife. Thurnby Lodge's Geographical and Historical perspectives must not be destroyed further. May now be the densest city in the UK with less green space for each man, woman and child than any other city.		Increase in noise and pollution is expected to be picked up and mitigated as part of planning application addressing design (DQP06: Residential amenity) and climate change policies (Chapter 6). Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Ward meetings were offered during 2020 consultation and neighbours were informed. All documentation available at the time was posted on Regulation 18 consultation website. Considerations of wildlife and geographical/historical perspectives have been taken into account in site assessments and will need to be considered at planning application stage in terms of landscaping and wildlife preservation.
Objection based on traffic increase, lack of parking, narrow roads, accidents, not safe for elderly and children to walk across if built up.	427 (Local resident)	Matters to do with parking, traffic and safety are expected to be addressed during planning application stage applying transportation (Chapter 16) and design (Chapter 8) policies.
Nature needs to be protected, lots of natural birds, birds of prey, bats. Building would break the housing of all the animals.	428 (Local resident)	Biodiversity impacts are expected to be mitigated, in line with Natural Environment policies (Chapter 15).
First consultation fundamentally flawed. Traffic problems, parking issues, environmental issues.	429 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Issues of traffic, parking and environmental
		Issues of traffic, parking and environmental impacts expected to be addressed in transpo

		assessments and Environmental Impact Assessments at planning application stage.
Objection as green spaces are very important to health, environment, communications and pleasure of life to all.	430 (Local resident)	Development is expected for only half of the site with the other half to be retained and enhanced as open space. Development is expected to meet with health and wellbeing (Chapter 7) and climate change (Chapter 6) policies in the Plan.
Fundamentally flawed.	431 (Local resident)	The Council believes this is in relation to the consultation process which was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
Consultation process was fundamentally flawed, Brent Knowle Gardens should not be considered at any point in the future.	432 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
Consultation process was fundamentally flawed. Consultation not inclusive and not notified. Issues of safety, pollution, crime, mental health. Site should not be considered at any point in the future.	433 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Neighbours were notified and site notices put up.
		The Council expects that the issues identified will be dealt with at planning application stage. It is expected that this will be in line with design (Chapter 8) and health (Chapter 7) policies
Consultation process was fundamentally flawed, not all affected were consulted.	434 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). All
More houses would mean more cars, congested parking, higher accident risk, unsafe for children and elderly. Site should not be considered at any point in the future.		properties in Leicester received a leaflet informing of the plan at Regulation 18 stage.

		Matters to do with parking, traffic and safety are expected to be addressed during planning application stage applying transportation (Chapter 16) and design (Chapter 8) policies.
Consultation was fundamentally flawed. Environmental protection of trees, houses sold on basis of green in the plan, mental health and congestion of parking.	435 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Parking, trees and congestion are all expected to be addressed as part of planning application in accordance with landscaping policies (DQP04) and transportation policies (Chapter 16)
Consultation was fundamentally flawed, Site is a natural flood run, environmental issues, light issues, parking issues, mental health issues, congestion, crime.	436 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). These issues are expected to be addressed through planning application using flooding policy (CCFR06), residential amenity (DQP06) and car parking policy (T07).
Consultation process fundamentally flawed as didn't hear anything about it/were not notified.	Local residents: 441, 444, 445, 448, 468, 469, 473, 475, 476, 477, 478, 480, 483, 484, 486, 487, 488	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). All neighbours were notified through site notices, neighbour letters and a leaflet that was circulated to all households in the city.
Consultation process fundamentally flawed. Do not build on the green as it is a safe place for children to play, soothing to eyes and health.	443 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).

		The site has been proposed for development of part of the site with the rest to be retained and enhanced as open space.
Green space is key factor for people's wellbeing, do not build on the green.	446 (Local resident)	The site has been proposed for development of part of the site with the rest to be retained and enhanced as open space.
Mental wellbeing is going to be impaired, need green spaces in city for community space, views from bungalows will be ruined.	447 (Local resident)	The site has been proposed for development of part of the site with the rest to be retained and enhanced as open space. Planning application would be required to consider design policies (Chapter 8)
Brent Knowle Gardens left in perpetuity by promise of the council to be a play area, need for fresh air to remain the same.	448 (Local resident)	The Council propose that this site will be for partial development with the rest to be retained and enhanced as open space. This should allow for some play space.
No consultation at any stage of the plan. Site left in perpetuity by the Council as a play area, need for green spaces remains the same.	449 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11) and residents informed.
		The Council propose that this site will be for partial development with the rest to be retained and enhanced as open space.
Drainage is a major concern in the area, on a steep incline, questions where rainwater will run off.	450 (Local resident)	The site has been assessed for drainage issues and a drainage strategy will be required for any planning application, as per the non-strategic site allocations document (SD/19, page 9).
New builds required to have open spaces/greens, save our greens.	451 (Local resident)	The site is only proposed for partial development to allow for enhancement of the remaining open space. This has been decided acknowledging the recognised open space

		deficiency in the ward balanced against housing need.
Massive parking issue already and will be made worse by 12 homes. Question road safety, volume of traffic.	452 (Local resident)	Traffic and parking will be picked up at planning application stage and Transport Assessment required as part of the site mitigations.
Initial consultation was shoddy and virtually non-existent. Removal of horse chestnut trees along Wintersdale Road will affect drainage and wildlife.	453 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Letters were sent out to every household in the city during the 2020 consultation, which was also extended to 12 weeks. Tree removal, wildlife impacts and drainage will be assessed at planning application stage. This will need to be in accordance with Natural Environment policies (Chapter 15).
Lack of full consultation at each stage. Land was turned over by sheriffs the builders to LCC to be maintained in perpetuity as a 'Children's playground.' Questions whether this makes the area common land and the government website statement that 'The management of common land must take into account the interests of both the owner and the commoners – people who have rights but so not own it". Any building will affect the local residents adversely. Essential for health, fitness.	454 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
Concerns over noise pollution from increased traffic, roads not wide enough, family wellbeing, house value going down.	463 (Local resident)	These issues will be considered at application stage by applying design policies (Chapter 8).
Objection as building on small green where small children play together, nice views of green space.	464 (Local resident)	The site is only proposed for partial development to allow for enhancement of the remaining open space. This allocation has been decided acknowledging the recognised open

		space deficiency in the ward balanced against housing need.
Objection as already have issues with parking and traffic throughfare, valuable for mental health, greenery/trees/views so important.	465 (Local resident)	Traffic and parking issues are expected to be addressed through planning application using Transportation policies (Chapter 16). The development would be expected to also consider health and wellbeing policies as per chapter 7.
Noise pollution from extra traffic, people etc, narrow roads struggling.	466 (Local resident)	The Council would expect that planning applications should consider the residential amenity policy in planning applications (DQP06).
Consultation took place during Covid, counsellors were not reachable at this time and not able to communicate	467 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Planning officers were available to communicate with residents and meetings held.
Able to use Brent Knowle Gardens to get fresh air locally.	470 (Local resident)	Part of the site is to be retained and enhanced as open space to allow for a locally accessible open space.
No consideration given for resident and children's safety. Danger of overcrowded roads and extremely busy traffic, additional parking needed. No consultation at any stage	471 (Local resident)	These issues will be considered further at planning application stage and transport Assessments will be required to address these issues, in line with transportation and design policies.
		Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
Drainage in the area is substandard and cannot take the volume of rain. Questions who pays for flood damage.	472 (Local resident)	A flood resilience and protection strategy, as well as drainage strategy, would be required to prevent flooding. The development would be

No consultation at any stage.		expected to manage flood risk in accordance with policy CCFR06.
		Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
Severe road safety issues on Wintersdale Road from speeding cars.	474 (Local resident)	Road safety will be addressed at planning application stage for the impacts of the development. This will be in accordance with transportation policies (Chapter 16).
Consultation was fundamentally flawed as took place during lockdown. Forbidden to make contact socially, not informed that the consultation recommenced in September 2020.	479 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Letters were sent out to every household in the city during the 2020 consultation, which was also extended to 12 weeks.
Lack of consultation at each stage. Ecosystem will suffer greatly including bats, badgers, bats and foxes, well established trees, flora and fauna.	481 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Impacts to ecosystem expected to be addressed as part of planning application. The Council will expect Biodiversity Net Gain to be addressed in line with policy NE02.
Residents were not informed correctly; no leaflet was dropped or letters/notices. Site will have even more traffic	482 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Leaflets were sent to every household in the city and neighbour letters sent.

		Traffic impacts have been assessed in site assessments and Transport Assessments will be expected as part of a planning application.
Concerns over the drainage which cannot take the amount of water that overflows onto the green. Many homes will do damage to the environment and people's health. Noone notified us of the plans.	485 (Local resident)	Drainage and impacts to the environment are expected to be addressed at planning application stage and be in accordance with Natural Environment (Chapter 15) and Climate change policies (Chapter 6) All neighbours were notified of the
		consultation and site notices put up around the site.
Petition of 419 signatures to remove site 481 from allocations and retain as green space.	498 (Residents of Thurncourt)	The Council have had to make some difficult decisions in site selection. To balance the needs of open space and the overall need for housing in the city, the Council have allocated this site for partial development. It is expected that the rest of the site will be retained and enhanced as open space.
16 representations from children against the building on green spaces for air quality, play space, wildlife, flood prevention.	500 (Local residents)	These issues will be considered further at planning application stage. The plan proposes that half of the site will be retained and enhanced as open space.

# Site 488 - Carter St/Weymouth St/Bardolph St East

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
The Council did not consider views and does not support housing on business premises. Support for a much larger housing allocation on the car park site, suggestion for around 30+ dwellings on this site.	345 (Pipi Print & Packaging)	The Council will amend the site boundary as part of main modifications. Calculations of the removal of this site will not have a detrimental impact on housing supply and will be made up by housing buffer. Further engagement will be made with surrounding landowners for development of the car park adjacent and the rest of the current site.

Comments from: 345 (Pipi Print & Packaging)

### Site 501 - Croyland Green

Comments from: 6, 25, 61, 332, 419, 420, 421, 422, 424, 432, 433, 434, 437, 438, 439, 440, 442, 455, 456, 457, 458, 459, 460, 461, 462, 484, 485, 489, 490, 491, 499 (petition of 127 signatures), 500 (Children's representations)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Housing sites methodology (2022) fails to comply with the criteria of open space quantity, Open space quality, impact on road networks, loss of playing pitches.	6 (Local resident)	The housing site methodology provides an analysis all of these factors. Further details of how the site assessment was undertaken including these factors is included in the Housing and sites topic paper (TP/5).
Development poorly thought through. Local traffic already exceeds design capacity, especially at school travel times. Parking in the immediate area is inadequate. Schools are oversubscribed, which means travelling further afield and associated congestion and air pollution. Little to no safe cycling provision this side of town so alternatives to car not realistic. Local health centre is incapable of dealing with further demand. Utilities in the area have already begin to break under the current population strain and in need of upgrades.	25 (Local resident)	These issues will be considered further at planning application stage. Transport Assessments will be required to address these issues, in line with transportation (Chapter 16) and design (Chapter 8) policies. Improvements to doctors' surgeries, schools would be expected as part of infrastructure policies (Chapter 18).
Consultation period 2 & 3 were during Covid lockdown and official notice were not located around Croyland Green. Process has ignored the effect on physical and mental health. Effect of increased traffic and the amount of space for 2 cars is not reality. Thurncourt Road already gridlocked and roads around struggle with emergency access. Serious lack of employment opportunities in the area Local schools and medical centres are unable to provide adequate provision with no spaces available.	61 (Local resident)	Only one consultation took place during 2020 pandemic and the next followed in January 2023. Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Site notices were put around the green. Health, road and infrastructure impacts would be assessed further during planning application stage. This would be through

		application of health (Chapter 7), transportation (Chapter 16) and infrastructure (Chapter 18) policies.
Plan not sound as appears not to have taken into account the views of the Thurncourt ward before a decision was made.	332 & 424 (Local resident/Independent researcher)	Previous representations received were considered in site assessment process to arrive at final site allocations.
The Council decision has not considered the exceptional, crucial value of		
2 very small Green Spaces on Croyland Green and Brent Knowle Gardens for recreation, health, nature/ wildlife and geographical/ historical 'Sense of Place'. Should not build on the green now or in the future.		As stated, the Council recognises the open space deficiency in the ward. The Council have had to make difficult decisions in site
Unacceptable housing development on limited green spaces. L.C.C. acknowledges that there is an 'open space deficiency' but appears not equate this with essential 'Green Space' in Thurnby Lodge's Thurncourt		allocations given the pressures to develop housing in the city to meet housing needs. In balance of this, the Council is proposing to
Ward. L.C.C. does not appeared to justify why it will destroy		only develop half of the site with the rest to
approximately 50% of this extremely important green space for the sake of just 9 houses.		be retained and enhanced as open space. The Council believes this is a proportionate approach to open space needs.
Other effects will include significantly increased noise, CO2 pollution and		
further reduced infra-red (heat) reflection.		Increase in noise and pollution is expected to be picked up and mitigated as part of
Repeatedly stated by local residents during ward meeting that L.C.C.		planning application addressing design
previously had not informed Thurncourt Ward / Croyland Green /		(DQP06: Residential amenity) and climate
Homestone Gardens residents adequately/properly or at all of the proposed 'Central Government Initiative'. Ward meeting not a		change policies (Chapter 6).
consultation meeting as already made decision. Suggested that a decision		Consultation was carried out in compliance
to develop was based upon non-consultation or extremely limited information, dissemination to Thurncourt Ward residents.		with the Council's adopted Statement of Community Involvement (SD/11). Ward meetings were offered during 2020
Space valuable to Thurnby Lodge residents and also especially to wildlife.		consultation and neighbours were informed. All documentation available at the time was
Considerable arguments for not building on green space. Challenge LCC conclusion that Croyland Green is 'suitable' and 'achievable' for housing purposes, although it is recognised that it is not 'deliverable.' Needs to		posted on Regulation 18 consultation website.

<ul> <li>justify why it is not a much-needed Green Space, Nature area and recreation area.</li> <li>Croyland Green is an official LCC created green as part of a then major housing development almost 70 years ago. Essential to the wellbeing of local residents. Name Croyland Green was aptly named in line with historic and geographical connections with the land 'sense of place.' Croyland Green means soft land with a common, open area. Car parking has destroyed a small part of the green. 18 young trees on site and net area has reduced from 0.51Ha to 0.42Ha.</li> <li>May now be the densest city in the UK with less green space for each man, woman and child than any other city.</li> </ul>		Considerations of wildlife have been taken into account in site assessments and will need to be considered at planning application stage in terms of landscaping and wildlife preservation. This is not classed as deliverable as it is not currently proposed to be delivered within the first 5 years of the plan period. This is based on landowner engagement and officer judgment. Heritage and archaeological constraints are taken into account within the site assessment. Site size threshold is based on SHELAA submission.
Consultation process was flawed as during lockdown and not made aware. Green should be for children to play safely. Housing value will be affected.	Local residents: 419, 420	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Half of the site is proposed to be retained and enhanced for open space provision. House values are not a planning consideration.
First consultation was fundamentally flawed as it was during covid lockdown and were not contacted. Greens are well used and vital for children's and adults' safety, mental and physical wellbeing	Local residents: 421, 437, 438, 439, 455, 456	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Half of the site is proposed to be retained and enhanced for open space provision.
First consultation was fundamentally flawed as it was during covid lockdown and people were not aware. Council not taken into consideration the impacts to residents.	422 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).

Other land available. Green land should be protected for the environment and mental wellbeing. Duty to protect and provide a safe environment as a safe place. More pressure on doctors.		Neighbours were notified via site notices and neighbour letters. The Council have exhausted all available land in the city to arrive at the final site allocations.
Consultation process fundamentally flawed. Should not be considered at any point in the future.	432 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
Consultation process fundamentally flawed. Not inclusive and not notified. Issues of safety, pollution, crime, mental health deterioration. Should not be considered at any point in the future.	433 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Neighbour letters sent out and site notices put up. All of these issues are expected to be picked up as part of planning application. Any scheme will need to take account of design policies (Chapter 8).
Consultation process fundamentally flawed. Not all residents consulted or made aware. More houses would mean more cars, congested parking, higher risks of accidents, unsafe for elderly and children. Should not be considered at any point in the future.	434 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Neighbour letters sent out and site notices put up. Parking and safety issues are expected to be picked up as part of planning application. The application would need to take account of transportation (Chapter 16) and design (Chapter 8) policies.
Consultation process fundamentally flawed. Just planted 10 trees on the green to help with the environment and will have nowhere to park the car.	440 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).

		Trees have been considered in site assessments. Planning applicants will be required to demonstrate that parking and mitigation for trees are addressed in the application.
Consultation process fundamentally flawed. Too many vehicles parked already.	442 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Road impacts have been assessed in site assessments and parking provision will need to be addressed in application.
Consultation process fundamentally flawed.	Local residents: 457, 484, 491	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11).
Consultation process fundamentally flawed. Space for children to play	Local residents: 458, 459, 489, 490	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Half of the site is proposed to be retained and enhanced for open space provision.
Parking problems already, kids need to play where they feel safe. Traffic problems. Don't need to cram more houses.	460 (Local resident)	Road impacts assessed as part of site assessments and parking and traffic to be assessed against a scheme coming forward. Transportation (Chapter 16) policies will be applied to address these issues.
Not safe, too much traffic on roads causing air pollution, noise and nowhere for young children to play.	461 (Local resident)	Issues around safety, air pollution and noise would be expected to be address through residential amenity policy (DQP06). Open space loss to be mitigated by partial development and nearby open space access.

Unsound due to mental health. Detrimental to children and adults. Need somewhere to play near home that is easily seen for safety.	462 (Local resident)	Half of the site is proposed to be retained and enhanced for open space provision to allow for local open space access.
Concerns over the drainage which leaks onto the road during heavy rain. New homes will cause damage to environment and people's mental health and wellbeing. Noone was notified of the plans.	485 (Local resident)	Drainage Strategy required as part of planning application in line with policy CCFR06. The application would also be required to address issues around the Environment in Natural Environment policies (Chapter 15) Residents were notified of site allocation at each consultation stage through leaflets, site notices and neighbour letters.
Petition of 127 signatures to remove site 501 from allocations and retain as green space.	499 (Petition from residents of Thurncourt)	The Council have had to make some difficult decisions in site selection. To balance the needs of open space and the overall need for housing in the city, the Council have allocated this site for partial development. It is expected that the rest of the site will be retained and enhanced as open space.
16 representations from children against the building on green spaces for air quality, play space, wildlife, flood prevention.	500 (Local residents)	These issues will be considered further at planning application stage. The plan proposes that half of the site will be retained and enhanced as open space.

# Site 505 - Dorothy Road/Linden Street/Constance Road

Comments from: 272 (Landmark Planning on behalf of Premier Drapers Ltd), 300 (Historic England)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Support for the allocation as this is a suitable location for development of housing. The city currently lacks a 5 Year Housing Land Supply. Site could potentially support more than 31 proposed dwellings, and this should be encouraged if detailed evaluation renders it possible. Early development for housing should be encouraged. Occupation of housing could happen in 2026.	272 (Landmark Planning on behalf of Premier Drapers Ltd),	Support for the delivery of housing on this site welcomed. Site capacities are indicative based on the standard applied of a minimum of 35dph However, this does not preclude site coming forward with higher density.
Not clear how setting of Grade II Listed Buildings at the Association of the Blind has been considered. Sensitive design, scale, massing and materials would be expected as part of any development proposal. The cumulative impact with site 222 will also need to be considered.	300 (Historic England)	The Council have assessed the Grade II listed buildings as part of heritage and archaeology constraints on the sites alongside cumulative impacts with nearby sites. The Council would expect any development coming forward to consider all heritage constraints. The non-strategic site allocations document (p.23-24, SD/19) outlines the suggested mitigations on the site. Heritage Impact Assessments will be required as part of the planning application process in accordance with policy HE01. Design and materials will be considered in planning applications.

# Site 525 - Fulford Road Open Space

Comments from: 99, 296, 340

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Space is used by residents for social gatherings and a play area for children. Walking distance area for gatherings and employees of nearby industrial estate. A pond that attracts great crested newts every year which are listed under schedule 5 of the Wildlife and Countryside Act 1981, section 9 (1). Section 9 (2) makes it an offence to intentionally damage, destroy or obstruct access to any structure or place which great crested newts use for shelter or protection. Offence to disturb them while occupying a structure or place.	99 (Local resident)	The Local Plan does carry forward the existing standard of 2.88 ha of publicly accessible open space per 1,000 population (para. 14.15 of Local Plan). Assessment has identified this area as being in open space sufficiency. The Council expect that the Local Wildlife Site should be protected, as per the non- strategic site allocations document (p.25, SD/19). Requirement for biodiversity net gain (Policy NE02. Biodiversity Gain) to be achieved, any planning application received for the site must demonstrate that an overall net gain in biodiversity will be achieved.
Proposed site is the heart of the community where parade is located. Use by local residents, local workforce and truck drivers for recreation. Policy not compliant with NPPF para 99 as proposed alternative (Ryder Road open space) is neither suitable in size, safe or offers the same biodiversity. Ryder Road open space will provide open access to the roads for Western Golf Course. Alternative is a small wedge of land with a deep ditch unsuitable for exercise and balls games. Fulford Road open space provides a varied range of habitats including pond, TPO trees, urban drainage ditch & a protected hedgerow which meets all the criteria with being in the vicinity of the habitat of Great crested newts protected Species protected	296 (Local resident)	The Local Plan does carry forward the existing standard of 2.88 ha of publicly accessible open space per 1,000 population (para. 14.15 of Local Plan). Assessment has identified this area as being in open space sufficiency. The Council believes that the nearby open space is in compliance with NPPF para 99 in terms of size and suitability.

<ul> <li>under wildlife and countryside act 1981 and is also European Protected species under annex IV of the European habitats' directive. The pond and nearby Hedges and ditches also come under conservation of Habitats and Species Regulations 2017, Contrary to section 1.5 of the Habitats Regulations appropriate assessment screening report, the site does need addressing (See policy NE01)</li> <li>Hedges and green space provide a pollution offset, Road networks around the area are in a poor state and unable to cope with heavy haulage. Extra traffic will come onto the same exit and entry roads as site 702. Reference made to para 16.4 and policy T02.</li> <li>Local services including doctors, dentists and schools are struggling to support current residents.</li> <li>Plan does not meet objectives 4,8 &amp; 9 or the green environment City message the</li> <li>City states when it comes to Fulford Road Green space.</li> <li>Suggestion to look at Ryder Road open space and other alternative sites instead of this one. Recommendation to plant more trees for the benefit of residents and offset pollution from industrial estate.</li> </ul>	The Council would expect that any so coming forward will consider the suggested mitigations in the non-stra site allocations document (p.25, SD/2 within the design. This includes facto such as safe access, ecological assessments, consideration of TPO's, impact to sports facilities, road safety quality and loss of green space. The council have considered alternat sites as part of the site assessment process.	ategic 19) rs y, air
<ul> <li>Reference made to policy HW02 'Health Impact Assessments (HIA)'. Doctors, Dentists and Schools are currently under immense strain.</li> <li>The space was designed for the local bungalows who use the space for exercise and to interact with neighbours which is vital for mental health. Easy access to the parade.</li> <li>The estate is comprised of social housing and also shared ownership schemes with some low-cost homes, so is more deprived.</li> <li>Air pollution is an issue on health from the industrial estate, trees and hedges needed for wildlife and to compensate from traffic pollution.</li> <li>Suggestion to use some of the land at the top of Western Park instead</li> </ul>	340 (Local resident) The Council would expect that any so coming forward will consider the suggested mitigations in the non-stra site allocations document (p.25, SD/2 within the design. This includes facto such as air quality, wildlife impacts an traffic pollution. The council have considered alternat sites as part of the site assessment process.	ategic 19) Irs nd

# Site 529 - Glovers Walk Open Space

-No comments received on this site-

## Site 549 - Hockley Farm Road Open Space

Comments from: 289 (Anchor)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Support for allocation of residential development, interest in bringing site forward for development of additional specialist older persons' housing. Considering the scale of housing need and developable area recommends indicative capacity increase.	289 (Anchor)	Support welcomed and noted. Site capacities are indicative, does not preclude site coming forward with higher density. Any planning application coming forward would be expected to address the constraints listed in the suggested mitigations in the site allocations document (p.29, SD/19).

## Site 557 - Ingold Avenue Open Space

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Objection to development with concerns over: need to maintain open space for mental wellbeing; prevention of wildlife thriving; increasing pollution, cars, light, CO2 and noise; lack of facilities and infrastructure (transport, doctors, dentists and schools). Concentration of development in LE4 area.	122 (Local resident)	The Council would expect that any scheme coming forward will consider the suggested mitigations in the non-strategic site allocations document (p.25, SD/19) within the design. Only two thirds of the site proposed for development with the rest to be retained and enhance as open space. Mitigations includes ecological assessments for wildlife and highways access assessment. The Council have considered all sites proportionate to the area that they are in and factored constraints in cumulatively.

## Site 559 - Judgemeadow Community College Playing Fields

Comments from: 199 (Sport England), 300 (Historic England), 322 (Oadby & Wigston Borough Council), 493 (petition of 319 signatures)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Site may be considered appropriate as it is not usable as a playing field area; it should be assessed as part of reviewed PPS and policy OSSR04	199 (Sport England)	The Council believes that the current Playing Pitch Strategy (EB/OS/4) is sufficient to justify the release of this land for housing development. However, a review of the Playing Pitch Strategy is being undertaken which will be available in due course.
Potential for impact to Evington Conservation Area Church of St Denys II, and SM Moated site with fishponds 1010686. Suggestions for policy criteria to restrict the height	300 (Historic England)	The Council have assessed the Conservation Area as part of heritage and archaeology constraints on the sites. The Council would expect any development coming forward to consider all heritage constraints. The non- strategic site allocations document (p.33-34, SD/19) outlines the suggested mitigations on the site. Heritage Impact Assessments will be required as part of the planning application process in accordance with policy HE01. Design and materials will be considered in planning applications. Criteria in policy DQP01 will be expected to be addressed within the planning applications on all sites to address issues of building heights.
'Non-strategic sites proposed for allocation' document shows that part of this site will be safeguarded for EDDR route. In contrast the site allocations map sets out the entire site as an allocation for residential development highlighting an area is safeguarded for the EDDR route. Questions if it would be more suitable that site allocation only covers 0.28Ha developable area to show which area will be developed.	322 (Oadby & Wigston Borough Council)	The Council has proposed this site for development with land safeguarded for the potential EDDR route. The EDDR route has been shown in the document to give an indication of a proposed EDDR. However, to allow for flexibility in design and to match the

Questions whether Leicestershire Highways authority have been consulted to ensure sufficient land has been safeguarded for the EDDR. Recommendation that EDDR is referenced in the Local Plan. Seek to confirm the development timeframes of the development of the three proposed allocations. Site 715 has a shorter development timeframe than sites 961 and 559 but more constraints including Green Wedge designation.		submitted SHELAA site boundary this shows the entire site. Development timeframes and site delivery information will be provided in due course. Current timeframes are based on officer judgement and landowner engagement. The Council have made some difficult choices
Difficult to see how a site that performs strongly on Green Wedge score, and poorly on RAG rating can be deemed a sustainable allocation.		to release some areas of the Green Wedge for development, despite being high scoring. Justification of the release of green wedge for development sites is explained further in the Green Wedge topic paper (TP/3).
<ul> <li>Petition of 319 signatures. Objection as the green spaces have been provided for the community to engage leisure activities for their wellbeing and used regularly for sporting events.</li> <li>Views are not being respected and the consultation process is not fully transparent. First consultation undertaken during a pandemic and the latest has disregarded previous objections. Promise that no new houses will be built on green spaces in Evington.</li> <li>Obligation to preserve these spaces as green corridors for nature to thrive. Urbanisation is at crisis point in Evington due to the volume of traffic and the space of the space</li></ul>	493 (Residents of Evington)	The Council would expect that any emerging scheme will consider the suggested mitigations in the non-strategic site allocations document (p.33-34, SD/19) within the design. Suitability is subject to consideration of school playing fields, green wedge. Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). The previous objections were considered in site 399
children during school times. Increasing pollution concern for the health of youngsters. Congestion is damaging the environment, ripping up dangerous verges, causing dangerous parking and littering. Mental affect it has on the local residents. Significant impact to facilities such as doctors and schools which are already at capacity.		assessment at Regulation 19. Full details of the Regulation 18 responses are on page 86 of Summary of responses to Regulation 18 (SD/17a) Mitigations includes ecological assessments for wildlife and highways access assessment.

## Site 569 - Krefeld Way/Darenth Drive Open Space

Comments from: 507, 512, 513

Main Issues Raised	Rep ID (name of	Council's response
	Statutory Consultee if	
	applicable)	
Objection as area cannot tolerate more houses, schools and doctor's surgeries are already oversubscribed. There would be total destruction of all of the trees and wildlife in the area.	Local residents: 507, 512, 513	The Council would expect that any emerging scheme will consider the suggested mitigations in the non-strategic site allocations document (p.35, SD/19) within the design. Suggested mitigations include ecological assessments and retention of mature trees.

## Site 575 - Land adjacent Great Central Railway (Policy CT04)

Comments from: 3 (Belgrave allotment society), 300 (Historic England)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Despite regular contact with the council, no intrusive plans have been shared with the Belgrave allotment society. Need to redefine the northern perimeter.	3 (Belgrave allotment society)	Full plans will be made available at planning application stage which would be expected to take account of all suggested mitigations in the 'non- strategic site allocations document' (p. 36, SD/19). Northern boundary to be removed from maps to take account of the allotment boundary. This should not impact on the overall scheme coming forward as the extent of amendment is minimal.
- The Grade II Listed II Mobil garage court is to the north east and any potential impacts on setting would need to be considered.	300 (Historic England)	The Council have assessed the Grad II listed building as part of heritage and archaeology constraints on the sites. The Council would expect any development coming forward to consider all heritage constraints. The non-strategic site allocations document (p.36, SD/19) outlines the suggested mitigations on the site. Heritage Impact Assessments will be required as part of the planning application process in accordance with policy HE01.

## Site 577 - Land adjacent Keyham Lane/Preston Rise

Comments from: 40, 180 (Netherhall community Association), 253 (petition of 27 signatures), 275

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Struggle with traffic and poor footpaths on the street, more congestion will be caused. Health impacts on air quality, particularly the high elderly population in the area. Insufficient street parking. Visual and noise screening from main traffic way will be lost, increased noise pollution.	40 (Local resident)	Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). Site notices were put up and neighbours adjacent to the site notified. The Council would expect that any emerging scheme will consider the suggested mitigations in the non-strategic site allocations document (p.38, SD/19) within the design.
Petition of 27 signatures objecting to site. Likely to have significant negative impacts on environment and local community. Proposed development would remove the natural barrier, impacting the privacy and property values. Increased noise pollution by traffic increase. Significant damage to biodiversity and wildlife. Development would have an impact on local air quality. Overcrowding and overdevelopment will have impact on local infrastructure. Increased congestion and off-street parking. Increased vehicle activity and associated congestion and safety.	253 (Petition with 27 signatures)	The Council would expect that any emerging scheme will consider the suggested mitigations in the non-strategic site allocations document (p.38, SD/19) within the design. Suitability summary has been assessed based on open space sufficiency and highways access.
Important green land that is vital visually and plants, trees and wildlife. Cause more congestion and problems of road safety. Schools are full to capacity and will be exacerbated by development. Nothing in the area in regard to leisure facilities. No local good parks. Important to keep green areas for wildlife and to help with noise and air pollution. Concerns from the stream next to their properties in the future.	275 (Local resident)	The Council would expect that any emerging scheme will consider the suggested mitigations in the non-strategic site allocations document (p.38, SD/19) within the design. Suitability summary has been assessed based on open space sufficiency and highways access. Flood Risk Assessment Biodiversity Net Gain needed as part of the suggested mitigations to address concerns of the stream and impacts to wildlife.

## Site 589 - Land to the east of Beaumont Leys Lane

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Need to maintain open space for health and wellbeing. Built up area preventing wildlife from thriving and increasing pollution, cars, light, CO2 and noise. The infrastructure, transport, Doctors, Dentists and Schools is unlikely to be able to meet demand, even with promised financial investment. LE4 is taking the brunt of development.	122 (Local resident)	The Council would expect that any emerging scheme will consider the suggested mitigations in the non-strategic site allocations document (p.40, SD/19) within the design. Whole plan infrastructure assessment (EB/DI/1) has been undertaken to assess local services. Site selection has been undertaken proportionately across the city based on rigorous site assessments city wide.

## Site 620 - Morton Walk Open Space

-No comments received on this site-

## Site 626 - Neston Gardens Open Space/Mud Dumps

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's Response
Consideration has not been given for section 8 of the NPPF. Planned development plus approval for 31 dwellings on Heathcott Road will be detrimental to the area unless more provision is provided. More should be done with this area as a green space. Also concerns regarding section 15 and the biodiversity of the site. More should be done with regards to creating a natural space and activities to improve the quality of life for existing residents in what is, historically, a deprived and high crime area	189 (Local resident)	Section 8 of the NPPF refers to Health and safe communities. Any planning application coming forward would be expected to consider health implications of development and provide mitigations. A whole plan Health Impact Assessment has been undertaken to assess implications of the plan (SD/7). Section 15 refers to conserving and enhancing the natural environment. Development would need to address ecology as part of site suitability I non- strategic sites proposed for allocation document (p.42, SD/19).

## Site 629 - Netherhall Road Open Space

#### Comments from: 2, 110, 180 (Netherhall Community Association), 225, 351 (Claudia Webbe - MP for Leicester East), 425

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Objection due to the risk of the area for flooding and issues of drainage. The local Only green space left the in the area for the community and children to play, no other local leisure facilities. Extra traffic will make an already busy and congested area even more dangerous. infrastructure will not be able to cope including doctors, schools and dentists.	2 (Local resident)	The Council would expect that any emerging scheme will consider the suggested mitigations in the non-strategic site allocations document (p.40, SD/19) within the design. This includes a potential re-naturalisation of the Brook, subject to flooding exception test. Half of the site to be retained for enhanced open space to meet local needs. Whole plan infrastructure assessment (EB/DI/1) has been undertaken to assess local services.
Estate not well served by open space. Council's 2017 review shows that most of the estate does not have access to parks, as they are beyond the recommended distance and involve crossing busy main roads. Page 207 shows green space just outside of the city boundary which is a private golf club so not accessible. Suggests that open space is improved with additional landscaping.	110 (Local resident)	The Local Plan does carry forward the existing standard of 2.88 ha of publicly accessible open space per 1,000 population (para. 14.15 of Local Plan). This is a recognised ward of open space deficiency. To balance the housing needs against the need for green space, this site has only been proposed for development of half of the site with the rest to be enhanced as open space. Page 207 of the Local Plan (SD/2) shows a map of the open space network in the Leicester Urban Area, which shows the network both in and out of the city. The area in question is in

		partial ownership by the Council. The Council will consider the removal of this area, as necessary.
Second round of consultation expects a technical understanding of the process which limits the engagement of residents which has been misleading and confusing for residents. The site represents a vital local resource for recreation, which is well used by a variety of users, for mental health. Netherhall open space falls within an area where access to informal green spaces is limited, there is no access to parks within 1000m. Would welcome the re-naturalisation of the Brook, potential for flooding here renders the site unsuitable for development. A recommendation for a thorough investigation of the viability of Netherhall Road Open Space, particularly with regard to the flooding risk of proposed developments. Consideration of other sites, including vacant buildings and unused garages, and evidence that convenience for developers has not been the deciding factor in these considerations.	180 (Netherhall Community Association)	<ul> <li>The Council acknowledges the open space deficiency in the ward. Site is proposed for development of half of the site with the rest to be retained and enhanced as open space. This is to balance the needs for housing against the needs for open space.</li> <li>The Council would expect that any emerging scheme will consider the suggested mitigations in the non-strategic site allocations document (p.44, SD/19) within the design. This includes a potential re-naturalisation of the Brook, subject to flooding exception test.</li> <li>All sites have been assessed based on the standard site methodology agreed by the authorities in Leicester and Leicestershire (EB/HO/5).</li> </ul>
<ul> <li>Process has not taken into account alternative sites. The Council should consider the three parks in Humberstone, Thurnby Lodge and Hamilton before building on Netherhall's only park. Brownfield sites, such as the vacant school and dilapidated Netherhall Road row of shops, next to the fields in question, could be developed instead.</li> <li>Proposal as it stands would provide issues such as loss of open green space that supported good health; traffic congestion; a greater pressure on local services and increased flood risk.</li> </ul>	225 (Local resident)	Site has considered a range of sites across the city to produce final allocations. The site is only proposed for development of half of the site to recognise the need to retain some open space on site. The Council would expect that any emerging scheme will consider the usual planning requirements within the design. This includes issues such as traffic, service pressures and flood risk.

<ul> <li>This land is the type of residential open space that must be preserved for health and wellbeing.</li> <li>This is a non-strategic site which requires a drainage strategy and is far from the most suitable land for housing development.</li> <li>Share the concerns of the Netherhall Community Association and urge the Council to work with residents and local community groups and organisations to protect much needed green space for public enjoyment and reassurance that their views have been taken into account.</li> </ul>	351 (Claudia Webbe - MP for Leicester East),	The Council would expect that any emerging scheme will consider the suggested mitigations in the non-strategic site allocations document (p.44, SD/19) within the design. This includes the need for a drainage strategy, loss of open space. The Council have taken some difficult decisions in allocating sites for development. The assessment has been based on a proportionate approach measured against the housing need. The site is only proposed for development of half of the site with the rest to be retained and enhanced as open space.
Proposal does not consider full extent of impact to local community or take account of wishes. Land needed for community cohesion and anti-social impact must be considered.	425 (Local resident)	The Council have taken into account all views across the consultations to arrive at final allocations. Site is proposed for partial development to retain half of the site as green space to be enhanced as part of planning applications coming forward. This is an expectation within the design for non-strategic site allocations document (p.44, SD/19).

# Site 631 - Newlyn Parade/Crayford Way

Comments from: 180 (Netherhall Community Association), 506

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Consideration of other sites, including vacant buildings and unused garages, and evidence that convenience for developers has not been the deciding factor in these considerations.	180 (Netherhall Community Association)	All sites, including brownfield and greenfield sites, have been assessed based on the standard site methodology agreed by the authorities in Leicester and Leicestershire (EB/HO/5).
Objections to site allocation based on increase in traffic and loss of play space	506 (Local resident)	Site is proposed for partial development to retain half of the site as green space, to be enhanced as part of planning applications coming forward. This is to balance the need for housing against the requests to retain the play space. All issues to do with increase in traffic will be addressed through the planning application.

Site 646 - Rancliffe Gardens

-No comments received on this site-

## Site 647 - Ranworth Open Space

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Have not taken into account the physical and mental health impacts.	65 (Local resident)	Physical and mental health impacts have been considered in the process of site allocation. Any applications coming forward will be expected to be in compliance with policies in Health and Wellbeing chapter (Chapter 7).

## Site 648 - Rayleigh Green

Comments from: 180 (Netherhall community Association)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's Response
Consideration of other sites, including vacant buildings and unused garages, and evidence that convenience for developers has not been the deciding factor in these considerations.	180 (Netherhall community Association)	All sites, including brownfield and greenfield sites, have been assessed based on the standard site methodology agreed by the authorities in Leicester and Leicestershire (EB/HO/5).

## Site 669 - Spendlow Gardens

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's Response
Objections as green allows kids to play and socialise safely. This is a big part of the community and provides benefits to mental and physical wellbeing. The development will look unsightly, play equipment on the site would be a great idea.	Local residents: 7 & 8	The Council would expect that any emerging scheme will consider the suggested mitigations in the non-strategic site allocations document (p.50, SD/19) within the design. The site is only proposed for partial development to allow for enhancement of the remaining open space and to acknowledge the recognised open space deficiency in the ward balanced against housing need.

## Site 684 - Land adjacent to Evington Leisure Centre

Comments from: 493 (Residents of Evington)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's response
Petition of 319 signatures. Objection as the green spaces have been provided for the community to engage leisure activities for their wellbeing and used regularly for sporting events. Obligation to preserve these spaces as green corridors for nature to thrive. Urbanisation is at crisis point in Evington due to the volume of traffic and children during school times. Increasing pollution concern for the health of youngsters. Congestion is damaging the environment, ripping up dangerous verges, causing dangerous parking and littering. Mental affect it has on the local residents. Significant impact to facilities such as doctors and schools which are already at capacity.	493 (Residents of Evington)	The Council would expect that any emerging scheme will consider the suggested mitigations in the non-strategic site allocations document (p.51, SD/19) within the design. This includes the retention of open space towards the rear of site to retain some open space in the area and requirement for Biodiversity Net Gain.

### Site 687 - Thurcaston Road/Hadrian Road Open Space (Policy E01)

Comments from: 9, 107 (LCC Cllr Vijay Riyait), 109 (Mowmacre Young Peoples Play & Development Association), 113, 156, 169 (Lotan Ltd), 246, 266 (ELG on behalf of Minstercare Group), 326 (North West Leicestershire District Council), 327 (Liz Kendall – MP for Leicester West), 362, 492 (Save our Mowmacre Field group)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's Response
Concerns about the impact on house prices and the environment. Already have two traveller camps in the area which have had several issues with.	9 (Local resident)	Issues around the environment including ecology are expected to be addressed through ecological assessments as per p. 52 of non-strategic site allocations document (SD/19).
		All Gypsy & traveller allocations have been assessed in coordination with the Multi Agency Transit Unit for suitability in the proposed locations. Reasons behind site selection are found in the Gypsy and Traveller site selection methodology paper (EB/HO/2b).
Gypsy & Traveller site was only introduced at the final stage of the draft plan and therefore materially affected the ability of the local community to express their views and opposition to the transit site allocation. The proposal was brought through a Council Housing Scrutiny and Overview and Select Committee meeting which does not properly comply with the public consultation process.	107 (LCC Cllr Vijay Riyait)	Site selection for Gypsy & Traveller transit provision was undertaken in accordance with the site methodology. Further detail of the assessment process can be found in the Gypsy & Traveller Transit Site Selection Paper (EB/HO/2b and the Gypsy and Traveller topic paper (TP/4).
The transit allocation did not use the methodology for selection consistently. This site is within half a mile of an existing permanent Traveller site on Greengate Lane and within a mile of a second permanent Traveller site off Thurcaston Road. This represents an unacceptable over concentration within the area of Traveller sites		The Council sought views on the sites from the Multi Agency Transit Unit and housing colleagues to assess the suitability of the Gypsy & Traveller allocations in the location they are in. This includes suitability factors such as the proximity to nearby Gypsy & Traveller camps.

Replacement of this open space with Industrial units would not meet the specified criteria in OSSR02, it should not be allowed. Claim of sufficiency does not take account of accessibility for local families and children. No mention of how the Policy fits with the City Council Environmental Policy.109 (Mowmacree Young Peoples Play & Development Association)Proposal not justified as based on flawed evidence. OSSR (2017) study reports graffiti and fly tipping but this is untrue. Health Impact Assessment does not find any negative impacts of the loss of open space, which contradicts para 14.3.No environmental Impact Assessment available on the council website.No consideration for para 183 of the NPPF. Local residents have suffered ill health from Biffa recycling plant which has been completely omitted.113 (Local	<ul> <li>the policies map (SD/3). This is instead allocated for employment development in accordance with policy E01 as shown on the policies map, so this policy would apply. Accessibility to Mowmacre Sports Ground and Ledbury Green noted as acceptable alternative open spaces in non-strategic site allocations document (SD/19, p. 52).</li> <li>OSSR (2017) study noted graffiti and fly tipping as a problem during the audit, whilst this was considered during site assessment this was not overriding reason behind the decision for the site allocation.</li> <li>Health Impact Assessment analyses the open space chapter (SD/7. P.61-63). However, this is a whole plan assessment and not specific to site allocations.</li> <li>Environmental Impact Assessment would be expected as part of planning application.</li> <li>Planning applications would be expected to consider pollution in accordance with NPPF para 183 and policy CCFR01 of the Local Plan to minimise carbon emissions.</li> <li>The Council would expect that any emerging scheme will</li> </ul>
environment, local businesses and the local area. Likely to resident)	consider the suggested mitigations in the non-strategic

increase crime rates, antisocial behaviour and disruption to employers/employees. Site not in keeping with area.		site allocations document (p.52, SD/19) within the design. This includes the usual planning requirements including addressing crime and local uses.
Inclusion of Gypsy and Traveller transit camp at final stage of consultation which deems the proposal should be returned to its initial consultation stage wholly to demonstrate legal compliance.	156 (Local resident) &492 (Save our Mowmacre field	The Council believes that the consultation is legally compliant with the allocation of transit pitches and the latest evidence base.
Assessment of sites to identify the suitability for the provision of gypsies and travellers transit camps was erroneous and did not apply the same parameters of measurement to each site. Recorded open and recreational play use; busy, noisy and disruptive factors from industrial and roads; and close proximity to other traveller sites as reasons for discounting other sites. None of these have been taken into account on this site. Red Hill Nook and Green gate Nook both within short distance and previous proposals refused due to clash of cultures, no record of being long established recreational play area or record being adjacent to industrial units. Low-income children are a protected characteristic group and have not been consulted. Identical representations (from 156 &492). representor 492 also has submitted a petition of 36 signatures on behalf of residents for	group)	Site selection for Gypsy & Traveller transit provision was undertaken in accordance with the site methodology. Further detail of the assessment process can be found in the Gypsy & Traveller Transit Site Selection Paper (EB/HO/2b and the Gypsy and Traveller topic paper (TP/4). Further views were sought externally on the sites from the Multi Agency Transit Unit and housing colleagues to assess the suitability of the Gypsy & Traveller allocations in the location they are in. This includes suitability factors such as the proximity to nearby Gypsy & Traveller camps. Consultation was carried out in compliance with the Council's adopted Statement of Community Involvement (SD/11). This included all groups including children.
the above reasons. Shocking that land found suitable for commercial development is	169 (Lotan Ltd)	The majority of site 687 has been allocated for
being considered for a non-commercial use. Unfair on existing and proposed users. Concerns that will impact on company growth. Intention to acquire the site for expansion but concerns over other uses on site.		employment, to meet the need for industrial uses. Existing uses would be expected to be considered in the planning application process. There is also a need for transit sites, so a small portion is also proposed to meet this need.
Very little green space in residential area, only playground for youngsters for miles. Surrounding road network would not be able	246 (Local resident)	The Council would expect that any emerging scheme will consider the suggested mitigations in the non-strategic

to cope with extra traffic. Fly tippin <b>g</b> is already a problem along this stretch of Thurcaston Road and would only get worse.		site allocations document (p.52, SD/19) within the design. This includes retention of play facilities where possible, or necessary enhancements. Traffic impacts and litter would need to be addressed in any planning applications.
<ul> <li>Objection to this draft allocation to include both employment and Gypsy &amp; Traveller uses on the basis of impact on amenity and appropriateness of site, and conflict with the relevant draft local plan policies. Significant highways access would be required to make access to the site suitable and flooding is a common problem. No evidence or justification provided as to why these sites have been identified as suitable for gypsy use. No consideration of other sites that may be appropriate.</li> <li>Clear need for employment land and this site in the ideal location to meet this requirement.</li> <li>Question the compliance with policy Ho12. Large vehicles, machinery and equipment at the site are unsafe, no safe and convenient pedestrian access, existing uses disturbed and employment market interest will reduce.</li> </ul>	266 (ELG on behalf of Minstercare Group)	This site has been identified as suitable for both of these uses. Site selection for Gypsy & Traveller transit provision was undertaken in accordance with the site methodology. Further detail of the justification for allocation of Gypsy & Traveller uses is found in the Gypsy & Traveller Transit Site Selection Paper (EB/HO/2b and the Gypsy and Traveller topic paper (TP/4). This includes assessment of amenity aspect, appropriateness and flooding constraints. The Council believes that the overall assessment is compliant with policy Ho12. The particulars of the safety in access will be further explored at planning application stage.
Now proposed that the site will be used for Gypsy & Traveller transit provision. Questions need for gypsy & traveller sites and the rationale for two sites in a similar area. No formal consultation of the addition of Gypsy & Traveller transit site Emphasis on the importance of green spaces for physical and mental health, wildlife and wider environment.	327 (Liz Kendall – MP for Leicester West)	Allocation for Gypsy & Traveller assessment has been driven by identified need in table 4 of the Local Plan (p.66) which has been driven by the Gypsy, Traveller and Travelling Showpeople Accommodation Assessment (EB/HO/2). The rationale for allocation is outlined in the Gypsy & Traveller Transit Site Selection Paper (EB/HO/2b and the Gypsy and Traveller topic paper (TP/4).
Objection as local green space needed for healthy access and lots of problems with cars when travellers on field before, anti-social behaviour, possible noise and smells from industry.	362 (Local resident)	The Council would expect that any emerging scheme will consider the suggested mitigations in the non-strategic site allocations document (p.52, SD/19) within the design. Traffic impacts and pollution need to be addressed in any planning applications.

Support provision of 12 pitches in city, support Gypsy & Traveller	326 (North West	Support noted and welcomed.
<ul> <li>Accommodation Assessment findings.</li> <li>Limited evidence on deliverability of two transit sites (not in accordance with para 10 of Government's policy on Traveller Sites (2015) – lack of evidence could put more pressure on NWLDC.</li> <li>More information requested on deliverability – what mechanism to choose one site over another; when this is likely to come forward; where on site transit provision would be provided</li> </ul>	Leicestershire DC)	The specifics will be dealt with at examination. Specifics to be shared as part of examination. Timing of application coming forward will determine which site comes forward first. Design and layout detail to be considered at application stage.
considering both are employment sites.		Working with Multi Agency Transit Unit to guide deliverability of the site. The Council has a strong track record of delivering Gypsy & Traveller accommodation on Council owned sites.

### Site 715 - Land North of Gartree Road

Comments from: 258 (Barton Wilmore on behalf of the Cooperative Group), 300 (Historic England), 322 (Oadby & Wigston Borough Council)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's Response
Fully supportive of the proposed allocation of site 715 and generally supportive of policies that support sustainable development. Provided a number of documents, including plans to demonstrate the suitability of land interest for residential development, as well as identifying any constraints of the Site, and how these can be accommodated and incorporated into well-designed, integrated housing layout. Attachments included in this representation include Vision document, transport issue note, potential access arrangements, SA findings and plans.	258 (Barton Wilmore on behalf of the Cooperative Group),	Support of the site and policies welcomed. Documents welcomed to help demonstrate the deliverability of the site and to provide a high-quality development. Welcomes the support of the Green Wedge addendum and review, both documents have been used in preparation of the Plan and
Client committed to securing high quality development that compliments the surrounding area and makes a meaningful contribution to the city's housing need. Welcomes the publication of the non-strategic allocations report. This is considered to be a useful tool in identifying all of the key constraints that a proposed allocation must address as it moves towards the planning application stage.		assessments of sites. The SHELAA site was the initial assessment of the site and the '5 years or less' is based on further landowner engagement. However, the Council would consider amending this as part of modifications.
The consideration of Area B is considered to represent a good example of demonstrating how circumstances have changed since the document was produced and how it could now be considered out of date. Moreover, it does not consider the specific parcel at Gartree Road that we know has been considered to be suitable for release through its proposed allocation. Whilst our client does not object to the continued inclusion of the 2017 Green Wedge Review as an evidence base document, they do consider that it should be treated with a degree of caution.		The SA independently measures each of the sites based on the site constraints. The Council recognises the lower scoring in some areas and would welcome that these are addressed through the suggested mitigations in the planning application. Any negative impacts have been considered as mitigations.

Considers that Green Wedge addendum is a more robust approach to green wedge parcels as it demonstrates that sub-parcels can be released. Land interest of site 715 included within the SHELAA as achievable and the promoter can confirm this is developable, suitable, available, and achievable, as well as indicating that the site is deliverable in the earlier years of the plan (6-10 years). However, this shows as less than 5 years on the site allocations document. We would recommend that this is amended for consistency. Considers that the SA score for this site has been overly negative and has failed to have regard to additional evidence in appendix 2 and 3 of representation. Believes that the SA should score the biodiversity impacts as green. Greenfield score should be amber or green and measured against other greenfield sites. Reasoning for why the site has been listed in SA as a 'least sustainable site' is unclear. Supportive of the general strategy and policies. However, the housing allocations should be maximised here possible. The Council should not yield onerous requirements. Greater clarity is required in regard to the infrastructure required to support the growth. Diagram 2 doesn't highlight the allocation. Para 5.1 – documents to be sense checked against emerging NPPF		The supply is based on sites availability and achievability. Diagram 2 only shows strategic sites. Non- strategic allocations shown on policies map. Updates will be made to relevant documents in due course. However, these are the documents that have informed the plan supply.
It is not clear how the setting of the SM Moated site to the north has been considered. There is the potential for nationally important archaeology at the site which is crossed by the Leicester to Huntingdon Roman Road.	300 (Historic England)	The Council have assessed the SM moated site as part of heritage and archaeology constraints on the sites. The Council would expect any development coming forward to consider all heritage constraints. The non-strategic site allocations document (p.54, SD/19) outlines the suggested mitigations on the site. Heritage Impact Assessments will be required as part of

the planning application process in accordance with policy HE01.
<ul> <li>ailable evidence how a decision has been reached to de- om green wedge. This is because:</li> <li>information provided as part of the consultation how the site 715 from the green wedge will impact on the function of a g green wedge. This sets a precedent for other areas of Leicester tershire being lost.</li> <li>ment spreadsheet does not set out justification for allocations t the overall assessment of the site. Does not provide measures or an assessment to establish whether these are s the site but does not provide mitigation measures.</li> <li>I does not specify that should consider the impact on green s. Site 715 has a shorter development timeframe than sites 961 onstraints including Green Wedge designation.</li> <li>Sta Provides mitigations needed on page 34 of SA Appendix B (SD/4b) which have been taken into account in site assessments.</li> <li>This site is allocated to be released from the Green Wedge loss has been sufficiently justified through the allocation and assessment. Policy Hould considers that Green Wedge loss has been sufficiently justified through the allocation and assessment. Policy Hould considers the state area wedge loss has been sufficiently justified through the allocation and assessment. Policy Hould considers the state area wedge loss has been sufficiently justified through the allocation and assessment. Policy Hould covers that development timeframes and site delivery</li> </ul>
information

	Current timeframes are based on officer
	judgement and landowner engagement.

## Site 960 - Land West of Bede Island Road (Braunstone Gate)

Comments from: 63 (Turley on behalf of DeMontfort University), 300 (Historic England)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's Response
Has a land interest in this site but policy Ho01 is not considered to be justified, site allocation document doesn't consider surrounding existing land uses. Suggested that part e) of the policy should be updated to state: "Respect the character of the area in compliance with the surrounding land uses, and the environmental, design, amenity (DQP06), and heritage policies in the Local Plan".	63 (Turley on behalf of De Montfort University)	The Council expects that residential amenity should be considered as part of design. The council believes that criterion d) sufficiently addresses this.
It is not clear how the historic environment has been considered. In particular there is the potential to impact on the setting of the Castle Scheduled Monument.	300 (Historic England)	The Council have assessed the Castle Scheduled monument as part of heritage and archaeology constraints on the sites. The non-strategic site allocations document (p.56-57, SD/19) outlines the suggested mitigations on the site. Heritage Impact Assessments will be required as part of the planning application process in accordance with policy HE01.

## Site 961- Welford Road Playing Fields

Comments from: 14, 15, 16, 18, 19, 20, 21, 22, 37, 125, 199 (Sport England), 252, 264, 281, 285, 322 (Oadby & Wigston Borough Council), 495, 515

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's Response
Many residents including those on Welford Road, Baldwin Road, Highgate Drive, Palmerstone Way/Boulevard, Hillcrest Road and Asquith Boulevard disagree with this green field site being used for building on. Time and time again, this landowner submits planning applications, for nothing more than profiteering on a greenfield site that should have remained available for young people's sporting activities and for local wildlife.	Local Resident: 14	The Council have assessed this site to be suitable and achievable taking into account site constraints. Mitigation is needed for sports fields, trees and wildlife impacts as per the non-strategic sites document (SD/19, p. 58-59).
Leicester claims to be an 'environment' city, yet the council seem to think it's acceptable for green fields – wildlife, trees, and nature to be destroyed for one man to profit from. There is an abundance of wildlife in this area due to the proximity of Knighton Park and the wash brook – disturbing and destroying their habitat is unforgivable, once gone, wildlife does not return. Voles, birds, insects, butterflies, rabbits, foxes, this is not just wildlife that exists in the countryside, it coexists in suburbs too and we need to protect it and stop encroaching on it.		Highways access and road impacts were assessed as part of site assessments. Suggested mitigations are provided for the site in relation to these aspects. Mitigation for loss of trees fronting onto Welford Road resulting from access road would be expected to be addressed proportionately.
Over the past decade West Knighton has seen a significant decline in natural habitat – the removal of trees in residents' gardens, two mini housing estates built on both sides of Welford Road, the removal of the green/boulevard back in the 1980s where does this end? We talk about creating healthy generations in the future – how is that possible when so much greenfield space is being destroyed? The playing field should never have been sold – it should have always been given over to local young people to play sports.		A flood resilience and protection strategy would be required to prevent flooding. The development would be expected to manage flood risk in accordance with policy CCFR06.
This site sits off one of the BUSIEST roads in the city and county – the traffic is already gridlocked at rush hour, how it is feasible to then build an access road into the housing site? Access would come at a cost of removing some vital and ancient trees along Welford Road.		The plan allocates around 71% of future housing growth on brownfield land. The Council expects that wildlife and trees impacts should be appropriately

The field sits adjacent to a flood plain. As we have seen in the media in recent years, constant building on greenfield sites destroys our natural defences in extreme weather conditions. This needs to be considered in this situation. Leicester City Council should be focused on regenerating brownfield sites (of which there are many in Leicester) before building on valuable green field sites. The housing crisis argument does not stand up here – this is not a site earmarked for affordable housing, social housing, housing association housing or for a right to buy scheme. It's simply a business transaction to make one person rich. Houses will be built here for a certain demographic of person to live in.		mitigated in any planning applications coming forward. The mix of housing is dependent on the planning application coming forward and would need to accord with housing policies in chapter 5 (Ho03: housing mix and Ho04: affordable housing).
The land is currently unused playing fields. The proposed building of 14 houses will increase traffic and pollution and more people for already limited resources. Would be better as a wildlife sanctuary for local wildlife and animals.	Local Resident: 15	<ul> <li>The Council would expect that any emerging scheme will consider the suggested mitigations in the non-strategic site allocations document (p.58-59, SD/19) within the design. This includes the need the usual planning requirements including traffic increase and air quality impacts.</li> <li>Site has been proposed for partial development (0.5Ha) to allow for enhancement of remaining open space for sports use and wildlife.</li> </ul>
Concerned that this plan for houses on the playing field would have a detrimental impact on the environment and wildlife due to the loss of land and removal of trees to provide entrance and access for building work and residents' access to proposed development. The proposed development will also add to the traffic on Welford Road	Local Resident: 16	The Council would expect that any emerging scheme will consider the suggested mitigations in the non- strategic site allocations document (p.58- 59, SD/19) within the design. This includes mitigations for TPO'd trees, consideration of Biodiversity Enhancement sites, site access and the

		usual planning requirements such as traffic generation.
Is the effect the proposed development will have on traffic pollution legal? Rush hour traffic along Welford Road starts around 7.30 a.m. and finishes at 9 a.m. and in the afternoon the outbound traffic starts at 3 p.m. and continues until 6 p.m. Will access arrangements to this development mean changes to the Welford Road layout causing longer traffic queues during peak times and subsequent pollution to the residents? Will the Council complete a traffic management survey before planning permission is considered.	Local Resident: 18	The Council expects that any emerging scheme will consider the suggested mitigations in the non-strategic site allocations document (p.58-59, SD/19) within the design. This includes consideration of air quality and traffic generation. Traffic management surveys should be undertaken during planning application stage dependent on the scheme coming forward.
Will the Council ensure that no lime trees will be lost to accommodate the new housing. This is the oldest tree lined approach to the city and the 100-year-old lime trees must be preserved	Local Resident: 18	The Council expects that TPO'd trees should be considered as part of any planning application coming forward. Proposals will need to consider DQP04 and NE04.
While the plans for this area are for 14 houses, the land identified for sports facilities should remain a wild area as this adjoins Knighton Park and the Saffron Brook. Since this area has become wild there has been an increase in wildlife including foxes, muntjac deer, badgers, bats and butterflies. If the green space identified could remain a true wildlife area that would mitigate the disturbance to the existing land to be developed.	Local Resident: 18	The development is for partial development (0.5Ha only) to account for retention and enhancement of sports field an associated wildlife impact.
Development would impact on the environment and wildlife, potentially lead to removal of vital trees on Welford Road, potentially need an access road – and the impact of traffic increasing pollution. Development would not be affordable housing, it's about one man profiteering from a piece of land, that was once gifted for local children to play sports on.	Local Resident: 19, 20, 21	<ul> <li>Wildlife impacts, tree removal, access roads and pollution have been assessed as part of site assessments. These issues will be further addressed in planning applications.</li> <li>Any planning application coming forward would need to accord with policy Ho04: affordable housing.</li> </ul>

<ul> <li>Would this proposed development of a Green Wedge continue to provide a green lung for this very busy area?</li> <li>Has any consideration been given to the number of sports pitches proposed? Will there be changing facilities? Where will users of these facilities park – is a car park on the plan? How will access to these facilities impact on traffic flow along an already busy Welford Road? Is it expected that floodlights will be installed and, if so, has an impact statement on existing wildlife been completed? This neglected playing field is now a haven for wildlife and would make a good add-on to Knighton Park and the Saving the Saffron Brook project.</li> <li>This area is a flood prevention area with run-offs into the Saffron Brook and is managed by the Environment Agency so it is debateable whether any sports pitches would be viable during periods of heavy rain.</li> </ul>	Local Resident: 22	Any planning applications would be expected to accord with policies in the climate change chapter of the plan (Chapter 6) to provide this green lung. The exact specification and layout of the site will be determined at planning application stage (car park, charging facilities etc). The non-strategic site allocations document (SD/19, p.58-59) outlines sports pitches and ecology to be mitigated in development. The site does have some recognised flooding constraints. A flood resilience and protection strategy will be required as part of a planning application coming forward.
It is not justified to develop community land that is perceived to form part of Knighton Park. It has been playing fields for 50 years or more. Alternative sites should be considered before developing playing fields.	Local Resident: 37	The development is for partial development, with the rest to be retained and enhanced for open space and playing fields.
Site plan needs updating to remove land owned by residents. If site 961 is going to be developed, it should not be on land owned by residents.	Local Resident: 37	Development would only be permissioned on land where the applicant has demonstrated agreement over landownership. The Council would be happy to rectify boundary errors if evidence can be provided of ownership. However, the boundaries appear to match to the current landownership according to land registry.

The proposal is a breach of the Environment Act 2021, Nature and Biodiversity (Part 6 and Part 7). Under the Act, Leicester City Council has a duty enhance biodiversity, including mandating a net gain biodiversity through the planning system. The Welford Road playing fields are no longer used for recreation and have been allowed to return to their natural state. Building on the land would reduce biodiversity in the city. The local plan fails to address the issue of increasing biodiversity. A better use of the land would be to turn it into a nature reserve. The Local Plan fails to deal with the statutory duty to achieve a net gain of biodiversity. The Council should as part of the local plan revisit how it will achieve this.	Local Resident: 125	The site allocations have been assessed considering the Environment Act 2021. Any planning applications coming forward will need to comply with policy NE02 'Biodiversity Gain'.
Developing the site is unsound. Whilst the playing fields are designated greenfield, they essentially form part of the Green Wedge between Leicester, Wigston and Oadby and should be designated as such. I propose that to increase biodiversity in the area the site is designated as the possible site of a nature reserve and is designated as part of the Green Wedge.	Local Resident: 125	The council has proposed to remove the site from the Green Wedge as a result of the overall strategic housing need to be met within the city. The Council proposed that only 0.5Ha of the site is developed to ensure that the remainder green space is retained and enhanced. This is proposed on the edge of the green wedge designation to minimise impacts to Green Wedge.
Building on this site would reduce air quality in the area	Local Resident: 125	Any planning applications would be expected to accord with policies in the climate change chapter of the plan (Chapter 6) to minimise air quality issues.
Accessing the site from Welford Road would cause traffic safety issues. The only viable access would be via Kingsmead Road via compulsory purchase of existing houses or via the Council depot.	Local Resident: 125	This is to be decided at planning application stage. However, the Council believes that access could be achieved.
Leicester City Council has a duty to co-operate with Oadby & Wigston Borough Council in maintaining the integrity of the Green Wedge between Leicester, Wigston, and Oadby. If the Welford Road playing fields are developed, Leicester City Council will have breached this duty to co-operate by destroying part of the Green Wedge.	Local Resident: 125	The Council have consulted and held DtC meetings with Oadby & Wigston Borough Council about this Green Wedge.
Site involves only partial loss, but this should be justified by evidence PPS review	199 (Sport England)	The Council are undertaking a review of the Playing Pitch Strategy which will be shared once available. It is proposed that

		enhancement to existing pitches will be expected. As part of a planning application.
The site is an important flood plain. With modern environmental changes and many more areas having problems with run off due to higher rain fall, it has become increasingly important to preserve these types of designated areas.	Local Resident: 252	A flood resilience and protection strategy would be required to prevent flooding. The development would be expected to manage flood risk in accordance with policy CCFR06.
The site is a wildlife habitat with muntjac deer, foxes, badgers and numerous birds present. We feel strongly that this needs to be preserved and protected.	Local Resident: 252	Mitigation suggested for wildlife habitats including achievement of Biodiversity Gain on site in accordance with policy NE04.
Development of this site will impact on already congested traffic at a very busy junction.	Local Resident: 252	Traffic impacts were assessed as part of site assessments and Transport Impact Assessments will be expected as part of planning applications.
Development of this site would leave us vulnerable to trespass, currently not experienced. How would this be managed?	Local Resident: 252	Planning applicants will be required to provide good design that does not impact on residential amenity, policy DQP06 'Residential amenity'.
The site currently receives overspill of wildlife from Knighton Park spinney, including foxes, badgers, and deer.	Local Resident: 264	Mitigation suggested for wildlife habitats including achievement of Biodiversity Gain on site in accordance with policy NE04.
Concerns that development will exacerbate flooding issues.	Local Resident: 264	A flood resilience and protection strategy would be required to prevent flooding. The development would be expected to manage flood risk in accordance with policy CCFR06.
Concern that if playing fields are publicly accessible, vandalism and damage could happen to the back of existing residents' houses.	Local Resident: 264	Planning applicants will be required to provide good design that does not

		impact on residential amenity, policy DQP06 'Residential amenity'.
Objects to the development of 14 houses. Site is an important floodplain, importance to preserve protected area. The ditch at the back of all the existing residences which also carries run off to and from the wash brook according to our deeds should be jointly maintained. No subsequent owner has made impact to maintain the site.	Local resident: 281, 285	A flood resilience and protection strategy would be required to prevent flooding. The development would be expected to manage flood risk in accordance with policy CCFR06.
Nothing to prevent another proposal for more houses to be built in the future. Questions whether the remaining land in site 961 would be used for local sport and recreation and whether the Council would take this on. Understood that the changing rooms have a preservation order and questions what is planned for them. Adverse impact on the traffic and congestion. Site contains a variety of wildlife. Questions if an Environmental Impact study has been conducted. Concerns over security, theft and vandalism for neighbouring properties.		Further planning applications would be assessed against the planning policy at the time. The Council would expect that mitigation to be made for any playing pitches on or off site, given the existing playing field designations, as part of any planning application. Transport Impact Assessment and Environmental Impact Study would be required as part of a planning application.
		Planning applicants will be required to provide good design that does not impact on residential amenity, policy DQP06 'Residential amenity'.
Footnote 2 of the Non-Strategic sites paper states 'Except for sites: 335 and 961 where a development area has been defined and the remainder is proposed as enhanced playing fields'. The developable area is shown as the area fronting Welford Road with a hatched lined in this document however, the Site Allocations Map shows the entire plot of land, and no area has been delineated for built development (although stated in the description the developable area is 0.5 hectares only). Preference for only developable area to be shown on the maps with the remainder of site to be shown as playing fields. Therefore, the rest of the playing field would not need to be de-designated from the green wedge.	322 (Oadby & Wigston Borough Council)	All documents show this site in its entirety for ease of viewing and to match the submitted SHELAA boundary. The non-strategic sites document is an indicative boundary for development. However, this is not fixed and therefore showing the full boundary will allow some flexibility in the planning application, as necessary.

	1	
Seek to confirm the development timeframes of the development of the three proposed allocations. Site 715 has a shorter development timeframe than sites 961 and 559 but more constraints including Green Wedge designation. Difficult to see how a site that performs strongly on Green Wedge score, and poorly on RAG rating can be deemed a sustainable allocation.		Development timeframes and site delivery information will be provided in due course. Current timeframes are based on officer judgement and landowner engagement. The Council have made some difficult decisions to release some areas of the Green Wedge for development, despite being high scoring. Justification of the release of green wedge for development sites is explained further in the Green Wedge topic paper (TP/3).
Significant increase in wildlife on site due to not being used for years. The nature conservation team should be able to provide evidence of this. Believe that there is at least one badger set in the area. Hope the Council will consider preserving this wildlife corridor. Development would contribute to existing poor air quality and pollution. Building on green wedge land should not be seen as viable option when seeking to improve quality and health. Concerns of further traffic, congestion and impacts to road safety on Welford Road. Questions how this fit with the city's travel plan. Flood risk concerns to properties on South Kingsmead Road and reassurance should be given that no further flood risk.	495 (Local resident)	The Council's specialist teams (nature conservation, transport, air quality and flooding) have provided feedback on all sites in site assessment process. Any planning application would be expected to address wildlife impacts, air pollution, road impacts and flood risk. Planning applicants would be required to provide a satisfactory Transport Impact Assessment, Environmental Impact Study, Air quality study and Flood resilience strategy to address these issues.
Impacts to properties on South Kingsmead Road in extensive wet periods, with overflow from the field. Development would mean less natural soakaway.	515 (Local resident)	A flood resilience and protection strategy would be required to prevent flooding around the site including on South
Playing fields represent the last remaining area of green belt from the city centre to Wigston, loss of which will be detrimental to the area's character.		Kingsmead Road. The development would be expected to manage flood risk in accordance with policy CCFR06.

Noted TPO'd trees on These will need to be planning application.	-
Incorporating the field into an expansion of Knighton Park will help the Council meet its legal duty of green space to population ratio. On the site.	posed to be kept
Belief that trees on Welford Road boundary are TPO'd.       Only part of the Green         Fact that been left to grow over has resulted in wildlife developing.       0.5Ha developable) is released on the edge of the ed	proposed to be

#### Site 962 - Amenity Land between Coleman Road and Goodwood Road (east of Hazelnut Close and Ellwood Close)

### Site 963 - Southfields Infant School and Newry Specialist Learning Centre

Site 992 - Woodstock Road

### Site 1001 - Phillips Crescent

Comments from: 357

Main Issues Raised	Rep ID (name of	Council's Response
	Statutory Consultee if	
	applicable)	
Building of 5 dwellings on Phillips Crescent would destroy a small but valuable green open space used for playing, dog exercising and enjoyment. This area is a little haven of green between 3 different housing developments. Area is safe for children, bordered by an access road only. Its loss would mean no space for children to play (sports) in a safe area in the nearby area. Loss of tranquil area for residents.	357 (Local resident)	The Council have assessed this site as an informal open space in an area and ward with sufficiency (EB/OS/3). Nearby open spaces including Bennion Road open space would be expected to provide this informal play.

### Site 1007 - Glazebrook Square

Comments from: 200

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's Response
The build will be a danger to motorist and pedestrians on all corners of the green. All cars and vans to the build will be an ongoing hazard the space cannot support the influx. Large cars and vans will immediately be illegally parked on pavements on all sides.	200 (Local resident)	The Council would expect that any emerging scheme will consider the usual planning requirements in the non-strategic site allocations document (p.66, SD/19) within the design. Impacts of road traffic increase have been assessed through the site assessments, which includes parking.

### Site 1030 - Land to the west of Dysart Way

### Site 1034 - Forest Lodge Education Centre, Charnor Road

Comments from: 508

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's Response
Once taken our green spaces cannot be replaced. The quality of life is surely an issue here as redevelopment of run down, abandoned and derelict built areas already around seems to be too much trouble? If built on, please keep the trees in good condition- the same for the old golf course as the life of a tree is generally longer than ours so they cannot be easily replaced - I am sure you will already appreciate the benefit of trees and nature for our human benefit.	508 (Local resident)	Site is on brownfield land; therefore, the Council believes that the first part is just applicable to site 702 (SL02). Suggested mitigations needed for trees on site included within the non-strategic site allocations document (p.69, SD/19). Ongoing work has been undertaken with trees officer through pre-application advice and notification of demolition application (20230958).

### Site 1035 - VRRE/Gipsy Lane

Comments from: 244 (Who's who Ltd)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's Response
This site privately owned; the allocation should be removed.	244 (Who's who Ltd)	Noted private ownership and the request from landowner for the site to be removed from allocations. The Council proposes a modification to remove this site from the site allocations as part of main modifications. Whilst this site is to be removed from housing supply, the amount will fall into the housing buffer.

Site 1037 - Spence Street

### Site 1039 - Bisley Street/Western Road

<u>Site 1040 – Mountain Road (Policy E01)</u>

### Site 1041 - Land off Hazeldene Road adj. to Kestrel's Field Primary School

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's Response
The plan does not clearly outline the reasonable alternatives to resolving access issue and why the site is suitable for housing. The access via Hazeldene Road is restricted by access to current houses and Kestrel Fields Primary School. The site is not suitable for the 21 proposed properties, in keeping with the current housing on this estate. The policy/proposal is unsound as it does not factor in how to resolve access issues	35 (Local resident)	The Council expects that any emerging scheme will consider the suggested mitigations in the non-strategic site allocations document (p.75, SD/19) within the design. This includes factors such as ecological constraints, access to services and satisfactory access.
to the site. It also does not set out how the wildlife on this site will be protected. We often see foxes and what appear to be deer.		The Council believes that access could be achieved from Hazeldene Road or Laverton
Does the local schools, GP and community services have enough capacity to accommodate supporting more homes in this local area. Surely it would be more feasible to use this land to expand the current school adjacent to meet the		Road, which will be further assessed through planning application.
requirement for school places instead of building yet more homes.		The Council recognises the importance of wildlife and species rich hedgerows and
The site needs a thorough review before being deemed appropriate for housing. Also, how does the Council ascertain that the site is appropriate for 21 residential properties? What size are these properties, 2, 3 4 bedroom homes? Will these		will require mitigations for ecological issues.
properties be for social housing, if so, this will affect the price of current properties in this area.		Exact make up of mix of housing will be determined during planning application.
The most recent sustainability analysis makes clear that the Local Plan is still very likely to have a negative impact upon the local environment overall. I am therefore opposed to what appears to be the proposal to use a significant portion of the land adjacent to Kestrel Mead Primary Academy for development (Site No. 1041), which I understand is a Local Wildlife Site (LWS).	351 (Claudia Webbe MP for Leicester East)	The Sustainability Appraisal does recognise a potential Local Wildlife Site and importance of nature on the site (SA Appendix B, SD/4b, p.48). This has been taken into account within the site

Comments from: 35, 351 (Claudia Webbe MP for Leicester East)

## Site 1042 - Land off Heacham Drive (Former Playing Fields)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's Response
Soundness of Housing Site Allocation is endorsed, and inclusion in Appendix 6 welcomed.	81 (Barratt David Wilson Homes)	Welcome support for soundness of allocation.
Although an estimated capacity of 53 dwellings at this particular location is stated in Appendix 6 and the accompanying Site Assessment/Selection Report, this figure is lower than anticipated given a Planning Application for 75 dwellings has been submitted to Leicester City Council (Ref. 20222274) which is currently awaiting Formal Determination.		Site allocation capacities are only indicative based on the standard minimum housing density of 35dph in consistency with policy Ho05.
Regarding the 'testing' of this proposed Housing Allocation - in terms of robustness and delivery - at the forthcoming Local Plan Public Examination, I confirm it is owned by Barratt David Wilson Homes and represents a logical continuation of adjoining major residential development (306 dwellings) currently underway by the same Developer (Ref. 20172015).		The Council acknowledges that higher densities may come forward and will seek to amend dwelling numbers as planning applications receive approval during hearing sessions.

Comments from: 81 (Barratt David Wilson Homes)

### Site 1047 - Land at Groby Road/Fosse Road North

#### Site 1051 - Gilmorton Community Rooms/Hopyard Close shops

Comments from: 26, 28, 29, 111, 141, 179, 235, 254, 256 (Landmark Planning on behalf of owners of Vachraj Store), 260, 276, 344, 346 (City Council Cllr Nigel Porter), 356, 365, 366, 367, 368, 369, 370, 371, 372, 373, 374, 375, 376, 377, 378, 379, 380, 381, 382, 383, 384, 385, 386, 387, 388, 389, 390, 391, 392, 393, 394, 395, 396, 397, 398, 399, 400, 401, 402, 403, 404, 405, 406, 407, 408, 409, 410, 411, 412, 413, 414, 415, 494

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's Response
For clarification and the avoidance of doubt, it needs to be clarified that Housing Site 1051 can be redeveloped with the incorporation of replacement retail (Use Class E3) and/or Community Facilities (Use Class F2) of a scale and format to be determined. It is therefore recommended a Modification to Appendix 6 of the Plan be made as set out below. The form of development would be designed to ensure that the residential allocation of 9 units would be delivered in full and designed to incorporate appropriate residential amenity protections. The format of the eventual development will be subject to submission of a detailed Planning application and consultations as required. The suggested modification would be to add in the words 'and potential re- provision of local retail and community facilities (Use Classes E and F2)' in Site 1051 Row of Appendix 6 the Column titled 'Capacity (dwellings') on Page 313 of the Draft Plan.	Other: 254 (Leicester City Council (Estates & Building Services))	Modification to the site as per the agreed wording from Leicester City Council Estates and Building Services section.
There has been no Community Involvement in relation to the plans for Site No: 1051. Gilmorton Community rooms. Not only does the idea involve removing the well-used and vital community asset of the Gilmorton Community Rooms, but it also involves removing the only food shop within walking distance of the estate. On an estate largely populated by elderly and disabled residents, I fail to see how any equalities impact assessment could accept the next nearest shops being 1.5 hour round trip by foot away across a six-lane road, as being reasonable. Especially on an estate with no frequent public transport options. Many residents who can currently meet their food needs on	Local Resident: 26	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.

their own will no longer be able to do so, forcing us to rely on the support of the council's social care team.		
The estate is already dangerously low on parking spaces. This proposal would remove a large existing car park and add even more houses to the estate with no parking provision, making a bad situation worse.	Local Resident: 26	Parking issues would be expected to be picked up as part of the planning application process in accordance with policies in transport chapter (Chapter 16).
There are many old/ disabled people who don't drive on the estate and the shop is a lifeline to those people. To remove it would cause hardship to many.	Local Residents: 28, 29	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
This plan is not sound and cannot be justified because the Council have not considered reasonable alternatives such as retaining or rebuilding facilities.	Local Resident: 111, 179, 235, 344, 356, 365, 368, 372, 374, 380, 392, 394, 395, 396, 397, 398, 399, 412, 414 Other: 346 (City Council Cllr Nigel Porter)	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
The Council have failed in their duty to cooperate because they have failed to consider the hundreds of previous public objections.	Local Resident: 111, 141, 179, 235, 260, 344, 365, 368, 372, 374, 380, 391, 392, 394, 395, 396, 397, 398, 399, 412, 414, 415 Other: 346 (City Council Cllr Nigel Porter)	All representations received during the four consultations on the local plan have been taken into consideration. Due to a clerical error, Document SD/17a – New Leicester Local Plan Summary of responses to Regulation 18 Consultation (Sept to Dec 2020) incorrectly associates representations made on this site to Site 527 – Gilmorton Avenue Playground.
The shop is the only shop within reasonable walking distance and offers an excellent service. It ensures residents of the estate do not need to add unnecessary road traffic by going to Aylestone, Blaby or Fosse Park. The council should be improving local facilities, not destroying them. The move to close the shop and community centre is not supported by the local community. They provide vital services for a disadvantaged community where many rely on the shop to top up prepayment meters and pay bills.	Local Resident: 111	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.

The City Council have not taken into consideration in the latest plan alternatives which would offer support to the community if the shop and community centre were to be demolished. If the shop, which has been a vital community asset Is demolished, the nearest facilities for basic commodities such as bread, milk, top up metres and other utility bills would either be at Carvers Corner in Glen Parva, or the shops in Old Aylestone. Both are lengthy walks if there is no car available. Access to Lutterworth Road is by a steep hill along Gilmorton Avenue. There is no provision, or lack of thought for residents by those who have drawn up the plan.	Local Resident: 141	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
At a public Community Ward meeting the City Council verbally advised they were to revise this plan with an amendment to build a new community centre and shop. As I understand it, this needs to be in writing to the Inspectorate, not as an amendment to the current plan during the consultation process. There is no guarantee that this will be done. During the last round of consultation there were several hundred objections to this site being used. Local views appear to have been ignored by keeping the plans for this site in place. The current facilities should be invested in properly; not to have the bulldozers demolish existing facilities which are a lifeline for the community. Even if the verbal information received on Wednesday 1st February has no guarantee, the plans will be amended in writing to the inspectorate and a community potentially losing facilities for ever. Residents deserve clarity and precise plans, not after thoughts creating anxiety.	Local Resident: 141	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses. As a result of a clerical error, the representations from the Regulation 18 consultation were recorded under another site (Site 527 – Gilmorton Avenue Playground) in the 'Summary of responses to Regulation 18 Consultation (Sept to Dec 2020)' (SD/17a). However, the Council have assessed the site availability, suitability, and deliverability before arriving at final site allocations. The comments received were considered as part of this process.
What provision is being made for the loss of the shop to the community should this site be included in the final decision? What provision is being made for residents to access a local community centre. If the amended plan is put in place, how high would 9 dwellings, a Community Centre and shop be, and would this have an impact on existing properties in terms of overview and access to natural light?	Local Resident: 141	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses. A planning application would determine the layout and design of the overall scheme, including heights and lighting. These are expected to meet with design policies in chapter 8 of the plan.

We all need the community centre to stay kept open for us to be able to VOTE there, And the corner shop to stay, because there are a lot of folks who can't walk far! And they cannot get to another store easily to obtain basic items such as milk and bread.	Local Resident: 179	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
This is a brownfield site, so thank you for that. And for preserving the biodiversity and wildlife in this area. The council should improve the existing community facilities, not destroy them. The shop and community centre provide vital services to the community. The community centre was very well used in the past and could be a community hub again, if properly maintained. The shop is a lifeline for the elderly and for families, for the everyday essentials it provides. The family who owns and work in the shop should be given a proper choice.	Local Resident: 235	Welcomes the support for delivering on brownfield land. The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
The proposed Local Plan is considered unsound regarding justification. As required in NPPF Paragraph 35, the Local Plan is required to take account of 'reasonable alternatives' to be justified and sound. This has not been done, and this representation raises a clear alternative for consideration.	Other: 256 (Landmark Planning on behalf of owners of Vachraj Store)	Alternatives for the sites have been assessed through the Sustainability Appraisal. The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
Concerns are raised about the Duty to Cooperate, due to the handling of objections at the Regulation 18 stage of the Plan. My recent correspondence with the local community and their representative Councillor (Cllr. Nigel Porter) has revealed that the Vachraj Store at 1 Hopyard Close and the Gilmorton Community Rooms are of great importance to the local community. The potential loss of these facilities has previously resulted in public objection. The City Council state that 2 representations against the proposed residential allocation of the site at the Regulation 18 stage were received, however Cllr Nigel Porter confirms that these representations did in fact consist of 564 individual representations. The receipt of these as individual 564 representations was confirmed by the Council, and this is illustrated in appendix B. This has created legitimate concerns that the City Council are not giving just regard to the level of public objection at the loss of these facilities, resulting in concerns over the Council's duty to co-operate during the Plan making process.	Other: 256 (Landmark Planning on behalf of owners of Vachraj Store)	As a result of a clerical error, the representations from the Regulation 18 consultation were recorded under another site (Site 527 – Gilmorton Avenue Playground) in the 'Summary of responses to Regulation 18 Consultation (Sept to Dec 2020)' (SD/17a). However, the Council have assessed the site availability, suitability, and deliverability before arriving at final site allocations. The comments received were considered as part of this process.

Both facilities are extremely well used and relied upon by the local community. The Vachraj Store is the only shop within walking distance of residents. Tesco Extra on Aylestone Road is one of the next closest shops, located 930m away including a steep 16m hill. This trip would be unmanageable for many of the elderly residents in the area, many of whom rely on the shop for food, medication, toiletry, and sanitary products. The shop also provides other important services such as parcel collection and pre-payment energy top-ups. The local area is poor, and most residents rely on pre-payment energy meters. The removal of the local shop would create significant issues for residents who would have to either drive or rely on irregular bus services for essentials, including food, medication, and energy. The community centre is a well-used and valued facility. It is used on a weekly basis for community meetings and sports.		The council is proposing a modification to allocate the site for mixed use rather than only residential.
The Council's 'Site assessment spreadsheet' states that the site's 'Red Amber Green' rating found 5 'red' issues, where the site 'cannot comply with an indicator.' Out of the 94 listed sites, only 4 sites contain more 'red' issues than this site. The issues relate to access to schools, access to employment, access to rail stations and (most importantly) access to health facilities and to a town centre. The Council's supporting documentation evidence residents' concerns that nearby facilities are insufficient. The lack of consideration against the removal of such facilities is alarming, particularly when the Regulation 18 representations have been downplayed.	Other: 256 (Landmark Planning on behalf of owners of Vachraj Store)	The site assessment spreadsheet sets out the constraints on the site. However, The Council believes that these issues could be appropriately mitigated through positive design and contributions.
The community and shop owner are understanding of the need to increase housing supply and accept that the site in its current form could be used more efficiently and could be made more visually attractive. It is therefore requested that the 'overall summary' (in Site Assessment Spreadsheet (2022)) for site no. 1051 be revised from 'Considered suitable for 9 dwellings' to 'Considered suitable for up to 6 dwellings, provided that the existing shop and community centre are retained or replaced'. It is accepted that the existing facilities will need demolishing to make effective use of the site. To protect the amenity of the community, it is proposed that any development of the site must provide a replacement shop and community centre prior to any	Other: 256 (Landmark Planning on behalf of owners of Vachraj Store)	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses. The current development capacity is based on the standard density of 35dph. The application scheme will determine the overall number of dwellings that will be provided.

residential development. Temporary alternatives should also be provided during the construction period. This is intended to both ensure that: a) the community is without its facilities for a short a time as possible, and b) to ensure that developers are unable to complete residential development without providing replacement facilities. This principle of this proposal appears to have received support within the Council. Cllr Nigel Porter has advised that during a Aylestone Ward meeting (w/c 6 <sup>th</sup> February 2023) Grant Butterworth was 'willing to concede to a mixed use on the site'. John Parnell, an Officer in Property Services has also verbally agreed with the client and owner to extend the lease for the shop for as long as requested, and that the Council is willing to invest in making improvements to the shop so that the community will have access to good quality facilities in the future. These verbal agreements are encouraging; however, the community would still seek a written agreement, particularly to ensure that the residential aspect of any development could not be built without the shop and centre first being provided, and for these facilities to be temporally provided during construction. This 'reasonable alternative' is submitted in direct response to substantial community objections which has been raised during the Regulation 18 process, as well as the Council's own recognition of a lack of services near the site. The suggested alternative is considered entirely reasonable, and respectful of the Council's housing objectives. The adoption of a reasonable alternative would only reduce the Council's housing supply by 3 dwellings. When considered against the total non-strategic allocation of 1,230 dwellings, and the total target of 20,730 dwellings, the loss of 3 dwellings is far outweighed by the positive impact which the retention of these facilities will have on the existing community. It is therefore concluded that the Council's consideration of this issue must result in the surgested alterations to th		
	Local Resident: 494	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
-		· · · · · · · · · · · · · · · · · · ·

There are alternative options available (e.g., repair, improvement) which must be considered before demolition. Repair and enhancement are more cost-effective than demolition and rebuild.	Local Resident: 260	The Council will consider the development layout and need for demolition as part of the planning application.
The community rooms and shop are a hub for local people – it is where people vote and attend groups. Many people rely on the shop and services. To remove them is inconsiderate and irresponsible and will negatively affect the area.	Local Resident: 260	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
The Plan is not sound as the existing community has not been considered. Not acknowledging the sentiments of the existing community is unjustifiable. The Council's duty to cooperate has not been fulfilled.	Local Resident: 276	The Council have considered all views in the final site allocation and believes that the Plan is in compliance with Duty to Cooperate.
The shop and community rooms are one of the main reasons we moved to this area. A shop and community centre within walking distance is essential. Building houses while removing facilities forces locals further from their homes for essential trips. Removing green space and independent local businesses contributes to a drop in living standards.	Local Resident: 276	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
The QR code link on the posters that appear to be very damp, soggy & ripped is not working.	Local Resident: 344	Site notices were printed on tearproof paper and information was included on the notice for people who could not use the QR code.
Gilmorton Community Rooms are a vital resource at this time of crisis due to the cost of living, holding food banks, councillor and police access, facilities that a large portion of the users would not be able to access if they were moved due to the poor bus route to the estate, ill health, mobility issues or not being able to drive. They provide a point of access to vote as a polling station, a facility that many would then not be able to access if this was lost.	Local Resident: 344	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
A lot of the local residents do not drive, and this is the only shop within easy walking distance. As a society we are supposed to be looking towards more sustainable solutions, not encouraging a flotilla of car, taxi and uber trips so people can get their vital food supplies. The community car park is also extensively used by visitors to the nearby flats and residential home.		

The Community Rooms and shops represent a vital community resource that needs to be refurbished rather than demolished, rejuvenated rather than rejected and more facilities such as a toy library, warm spots, community library, etc., need to be brought in, so I object to this proposal. I respectfully request that the Inspector dismisses the council's application to destroy our community centre and shop.	Local Resident: 344	The Council have not yet made a decision about demolition of the shop as this will be decided at planning application stage. If this is demolished, the shop and community room would need to be provided as part of the scheme.
The proposal that the shop & community centre should be destroyed is completely unacceptable. The shop provides vital goods and services for vulnerable members of our community, and it is of utmost importance that we protect the facilities and ensure they remain open and accessible to those who need them. The Rooms are the last remaining community centre in Aylestone. In 2020 when the council first dropped their Local Plan bombshell to demolish the Shop and the Community Rooms; I chaired an absolutely packed meeting in the Rooms. They are an incredibly valuable asset run by the community and used by the community for events, meetings, birthday parties, the food bank, councillor meetings, messy church, voting, and more. What residents want is the current facilities improved, not demolished. Whatever agreement the council makes is always at risk that once the premises are demolished, they will never be rebuilt. The value of these facilities to the community overrides the need for nine dwellings. We have already identified brownfield sites which are not allocated sites in the local plan, the owner of one is very keen to have a housing allocation and the council have no objection to a change from industrial to residential. I would like to attend the hearing and clarify the specific details about alternative sites for residential development which would help the council achieve their housing targets.	Other: 346 (City Council Cllr Nigel Porter)	The Council recognises the value of the community facility in the area. The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses. The Council have identified sites based on their overall suitability, availability and achievability within the timeframe of the Plan. This includes all sites identified and assessed through Call for Sites and through previous consultations. The Council recommends that any further sites should be submitted through the Call for sites exercise to allow these to be assessed as part of the next SHELAA.
This shop is a valuable asset to the immediate community used by 95% of locals. The shop, along with the community rooms, is the heart of this estate. The nearest alternative shop is nearly 1 mile away. Many elderly	Local Resident: 356	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.

residents are unable to walk up the incline of Gilmorton Ave onto Lutterworth Rd.		
There are already long traffic waits from the estate to get onto Lutterworth Rd. More houses will lead to more traffic.	Local Resident: 364	Road impacts considered as part of site assessments. Planning application expected to consider the traffic impacts in compliance with transportation (Chapter 16) and design policies (Chapter 8)
The shop is essential for the estate. The nearest alternative shop is nearly 1 mile away. Many elderly residents are unable to walk up the incline of Gilmorton Ave onto Lutterworth Rd. Refurbish and rent out units next to the shop if income is required.	Local Resident: 364	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
The council has a duty of care to improve the existing facilities. Demolishing the existing shop and community centre will bring instability to the community. The council could also provide other facilities like an outdoor gym, children's play area, etc.	Local Resident: 365	The Council have not yet made a decision about demolition of the shop as this will be decided at planning application stage. If this is demolished, the shop and community room would need to be provided as part of the scheme. Open space with play facilities is provided on Gilmorton Avenue currently.
The allocation is not sound, legally compliant, and fails the duty to cooperate. As a single mother with no means of transport, I would struggle to get to the nearest alternative shop, which is about a mile away. Many older residents would also struggle.	Local Resident: 366	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
Many single parents, families, and OAPs will be affected by the loss of the shop and community rooms. Having to drive to an alternative shop will increase emissions.	Local Resident: 367, 371	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
There are no plans to re-locate the shop and community rooms. This will fracture the sense of community and force people to drive to alternatives which goes against the council's commitment to reducing its carbon footprint.	Local Resident: 370	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
Housing plans should enhance and add to local economies and communities. This plan destroys both. An alternative site should be found where housing needs can be met while also adding to local facilities to serve the increased population.	Local Resident: 370	The Council have assessed all available and suitable sites in the city before arriving at final site allocations.

The shop and community centre are lifelines for the elderly and infirm	Local Resident: 373	The Council recommends modification of the
members of the community. There is no other shop within a mile of the estate. The money to build the 6 houses could be better used to		site allocation from residential only to mixed residential, retail and community uses.
improve the community centre.		residential, retail and community uses.
The shop and community centre are important for the community. They should not be demolished.	Local Resident: 374	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
I am retired and disabled so am reliant on this shop for all essential supplies. If the shop closes, I will have to rely on family and friends.	Local Resident: 375	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
Accessing alternative shops will be difficult for a lot of locals, especially elderly people, due to the limited bus service and the steep hill.	Local Resident: 376	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
Removal of the shop would mean residents would have to seek out alternative shops with the nearest being a significant walk away. This would be especially difficult for elderly residents.	Local Resident: 379	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
Objection to removal of only shop within walking distance. Its removal would affect the elderly and would necessitate journeys by car.	Local Resident: 381	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
This site allocation will deprive people of a shop that is essential to their wellbeing. I cannot walk far and do not drive, as is the case with a lot of people on this estate. The shop and the community centre should be kept. A foodbank is run from the community centre, and it is also used as a youth centre.	Local Resident: 383	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
The shop is needed. Bad bus service.	Local Resident: 384	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
You will be taking away the only shopping facility within a mile of the estate. As an 84-year-old pensioner, I don't want to drive every day while I'm still fit to walk to the shop.	Local Resident: 385	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.

All residents rely on the shop. This will cut off our supplies. We have a care home in the estate which also relies on the shop.	Local Resident: 387	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
There is plenty of room at the back of Gilmorton for construction	Local Resident: 387	The Council have assessed all available and suitable sites in the city before arriving at final site allocations.
I am 76 years old and disabled. I rely on the shop and the community centre for its foodbank. Are you going to schedule a bus for Saturdays because the hill is too steep for me.	Local Resident: 388	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
The allocation does not meet with the wishes of Gilmorton residents who want the shop to remain open. I rely on the shop for all my shopping.	Local Resident: 390, 400	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
A replacement shop and community centre must be part of the new development and must be up and running before the existing facilities are demolished, or temporary accommodation for them must be provided in the interim period. I visit the shop daily. The shop and community centre are the focus of the area and within walking distance. For an older person like me (83 yrs old), once I can't drive and faced with the Gilmorton hill, the 83 bus will be the only alternative and being a subsidised service, it is vulnerable to cuts.	Local Resident: 391	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses. Decisions around demolition and provision of replacements during the construction phase will be decided during planning applications.
The allocation is unsound because it removes services from a community that has no alternatives. The least mobile will be excluded. The area is poor, and the community centre allows a foodbank and youth centre to exist.	Local Resident: 393	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
There shouldn't be any additional housing unless infrastructure is improved. This allocation removes infrastructure from a community that is isolated at the bottom of a steep hill and those without a car are left without community facilities.	Local Resident: 393	The Council would expect that any infrastructural improvements should be made in compliance with policy DI01.
Council should commit to a programme of maintenance and repair in relation to the shop and community centre. The shop is the only one within walking distance for me.	Local Resident: 395, 397	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses. The maintenance and repair of the shop and

		community facilities will be considered as art of planning application.
The rebuilding or updating of the present facilities would allow them to continue to provide essential services to the community and therefore comply with soundness.	Local Resident: 399	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
Find a site to build on which does not disrupt the lives of people by closing the shop and community centre.	Local Resident: 400	The Council have assessed all available and suitable sites in the city before arriving at final site allocations.
I do not agree with the allocation as there won't be any shop down here.	Local Resident: 402	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
The allocation will increase volumes of traffic on Gilmorton Avenue which is the only way out of the estate. Objection to losing the only shop on the estate.	Local Resident: 403	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses. Increases in road traffic would be expected to be addressed at planning application stage in accordance with design (Chapter 8) and transportation (Chapter 16) policies
The shop is a lifeline and the closest one for anyone who cannot drive. You have not listened to us. By removing it you might as well remove human rights as not everyone can order their shopping online or drive.	Local Resident: 406	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
The Council does not need to build more houses. There are enough houses already.	Local Resident: 408	The Council is required to build houses to meet with housing requirements.
Locals rely on this shop. The closest alternative is 1 mile away. For people who cannot drive, it is impossible to get to an alternative shop.		The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
This proposal is not sound as there is no consideration for the current provision for our community. The existing services are vital, especially for the elderly and vulnerable. There is no thought for revitalisation of the current services.	Local Resident: 409	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.

The shop is a lifeline to myself and my partner as we are both disabled and about to give up my driving licence so I would have to rely on family for supplies.	Local Resident: 410	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
Why has there not been consideration of the wishes of locals? This cannot be found sound and consideration should be given to improving current facilities rather than removing them.	Local Resident: 411	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
Why can't the Council improve/maintain or rebuild the existing facilities within their proposals? There are no other facilities on the estate. The shop provides vital services for the elderly and local families. The community does not support the proposed allocation.	Local Resident: 412	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
Plan is unsound, no consideration given to residents. The shop is essential for many people with mobility issues and the elderly.	Local Resident: 413	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
The shop is vital for me and my family. The council should improve the existing facilities, not destroy them. The shop provides vital facilities for my disabled children.	Local Resident: 414	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
The shop is a lifeline for families and the elderly. Some people would not be able to travel to alternative shops due to age, illness, disability, etc. The shop was a great asset to the community during the pandemic. The community centre should be repaired and brought up to standard. The community centre is used by people to meet with councillors for advice and support. It is also used for a foodbank, parties, and other activities.	Local Resident: 415	The Council recommends modification of the site allocation from residential only to mixed residential, retail and community uses.
BLANK representations with only ticks next to 'No' on soundness and DtC compliance, and 'yes' on legal compliance	Local residents: 369, 377, 378, 382, 386, 401, 404, 405, 407	Noted objections to the sites.

# <u>Site 1052</u> - Railway station, former Sorting Office and station car park, Campbell Street (Policy CHA01 – Railway station)

Comments from: 261 (Marrons Planning on behalf of Charles Street Buildings), 267 (Leicestershire County Council), 300 (Historic England); 320 (Portal Ltd), 353 (Leicester Green Party)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's Response
It is not clear how the impact on Granby Street and St George's Conservation Areas or other heritage assets, including the Grade II Railway station, has been considered. The Grade II gate piers to the former Midland Railway Station appear to be within the site.	300 (Historic England)	The Council have assessed the Grade II Railway Station, St George's and Granby Street Conservation Areas as part of heritage and archaeology constraints on the sites. The Council
This is an important gateway site and specific policy criterion relating to scale and form would likely be appropriate.		<ul> <li>would expect any development coming forward to consider all heritage constraints. The non-strategic site allocations document (p.81, SD/19) outlines the suggested mitigations on the site, including for retention of Gate Piers and station building. Heritage Impact Assessments will be required as part of the planning application process in accordance with policy HE01.</li> <li>Policy criteria specific to the railway station is policy CHA01.</li> </ul>
One particular policy we feel is not essential is the large re-vamp of the city's railway station into shopping mall. It was not re-vamped that long ago. We oppose this revamp, which should be scaled back to address capacity, access and issues for disabled people as a focus.	353 (Leicester Green Party)	The development of the railway station is a key strategic decision for the city to provide high quality offices with improvements to the streetscape.

The railway site is in existing use, requires funding to be agreed and secured and would be subject to an extensive Network Rail consent procedure. This does not suggest a site that is available and ready to deliver office development at the scale envisaged in the draft.	261(Marrons Planning on behalf of Charles Street Buildings)	The planning application for demolition of the existing Parcel Yard at the station was approved (20231214) in December 2023 which is one of the first stages of the process. Proposed office use will be subject to the proposed application.
As neighbours of the railway station we need to understand the risks posed by the development to access to our workplace, buried utilities, dust and air contamination caused by demolition and construction, parking and deliveries. We would want to be included in all communications regarding project timelines and have visibility of drawings and plans.	320 (Portal Ltd.)	As planning applications come forward, neighbours will be notified of the details. Plans will be expected to include detail of how pollution, parking and other constraints will be mitigated.
The location of new offices around Leicester Railway Station is welcomed.	267 (Leicestershire County Council)	Support noted and welcomed.

#### Site 1053 - Land at Midland Street, Southampton Street, Nicholas Street, and Queen Street (Policy CHA07 <u>– St Georges Cultural quarter</u>)

Main Issues Raised	Rep ID (name of Statutory Consultee if applicable)	Council's Response
There is the potential to impact upon heritage assets; St George's Conservation Area, the Grade II* Listed Church of St George II* and other heritage assets are to the west. It is not clear how any impact has been considered as part of the Plan process. Specific policy criterion relating to scale and form would likely be appropriate should the site be pursued.	300 (Historic England)	The Council have assessed the Grade II Listed Church of St George II, St George's Conservation Areas and nearby heritage assets as part of heritage and archaeology constraints on the sites. The Council would expect any development coming forward to consider all heritage constraints. The non- strategic site allocations document (p.83, SD/19) outlines the suggested mitigations on the site. Heritage Impact Assessments will be required as part of the planning application process in accordance with policy HE01. Policy criteria specific to the railway station is policy CHA07.
Queries over the deliverability of this site. There are multiple ownerships to assemble, funding arrangements are in their infancy and there is no clear masterplan for the site.	261 (Marrons Planning on behalf of Charles Street Buildings)	The Council is confident that the site is deliverable.

Comments from: 261 (Marrons Planning on behalf of Charles Street Buildings), 300 (Historic England)