

Sustainability appraisal of the draft Leicester Local Plan

Appendix E. Recommended mitigation measures and their implementation in the plan

The table below shows the 2020 and 2022 SA recommendations on how the sustainability of the plan could be improved, and information about whether any changes were made to the plan in response to these suggestions. The following colour coding was used for the last column:

Recommendation fully integrated into the policy
Recommendation mostly integrated into the policy
Recommendation partly integrated into the policy, plus commentary from the planning team
No changes made to the policy or supporting text, plus commentary from the planning team

Policy	SA suggestion to improve sustainability	Changes made to policy
4. Strategy for Leicester		
VL01	-	
SL01	<ul style="list-style-type: none"> The numbers in red in the policy do not add up to 100%. Explain where the rest will come from? Should the 'Employment' section be part of this policy? It sounds more like supporting text. Remove? 	Supporting text amended
SL02	<p>This policy does not provide enough detail to allow it to be appraised. However, based on the site appraisal, the following should be considered for inclusion in the policy:</p> <ul style="list-style-type: none"> Biodiversity net gain (possibly offsite) for the Local Wildlife Site, woodland, ponds etc. Visual and biodiversity links to the wider countryside, to partly mitigate for the loss of the Green Wedge Archaeological studies to check archaeological potential, and possibly recording or other measures if archaeological finds existing on site. Protection of the ponds on site and any ditches/streams from runoff and contamination 	Supporting text addresses the character of the surrounding area and the Green Wedge. Otherwise not addressed. Could be addressed in supporting text such as that of SL05 and SL06.
SL03	<p>This policy does not provide enough detail to allow it to be appraised. However, based on the site appraisals, the following should be considered for inclusion in the policy:</p> <ul style="list-style-type: none"> Biodiversity net gain (possibly offsite) for the woodland, ditch, hedgerow, badger setts, Great Crested Newts etc. Visual and biodiversity links to the wider countryside, to partly mitigate for the loss of the Green Wedge Recording or other measures of dealing with archaeological finds at the site site. Protection of the drain adjacent to site 579 re. runoff and contamination Requirements re. improvement of public transport to the site Provision of amenities on site to reduce the need to travel. GP, school and allotments are comparatively far away. 	Supporting text addresses the character of the surrounding area and the Green Wedge. Otherwise not addressed. Could be addressed in supporting text such as that of SL05 and SL06.
SL04	<p>This policy does not provide enough detail to allow it to be appraised. However, based on the site appraisals, the following should be considered for inclusion in the policy:</p>	Policy includes "retention of the on-site pond" though not protection from runoff etc.

Policy	SA suggestion to improve sustainability	Changes made to policy
	<ul style="list-style-type: none"> • Biodiversity net gain (possibly offsite) for the hedgerow, pond, mature trees, possible bats etc. • Protection of impacts to the adjacent Local Wildlife Site • Visual and biodiversity links to the wider countryside, to partly mitigate for the loss of the Green Wedge • Protection of the pond on site from runoff and contamination • Avoidance of development on the north-east part of the site that is flood zone 3b • Full assessment and mitigation of archaeological finds at the site site. • Requirements re. improvement of public transport to the site • Provision of amenities on site to reduce the need to travel. GP, school and allotments are all far away. • Provision of alternative site for riding school? 	<p>Supporting text addresses the character of the surrounding area and the Green Wedge. Otherwise not addressed. Could be addressed in supporting text such as that of SL05 and SL06.</p>
SL05	<p>This policy does not provide enough detail to allow it to be appraised. However, based on the site appraisals, the following should be considered for inclusion in the policy:</p> <ul style="list-style-type: none"> • Biodiversity net gain (possibly offsite) for the hedgerow, woodland, badgers, bats, swallows, swifts, possible Great Crested Newts (will not be easy to do this) • Visual and biodiversity links to the wider countryside, to partly mitigate for the loss of the Green Wedge • Protection of the flood relief basin/SuDS on site from runoff and contamination • Protection of TPO trees • Assessment and mitigation of archaeological finds at the site site, including ridge and furrow. • Protection of former Leicester Frith Farm and Gilroes Cemetery from impact of development • Requirements re. improvement of public transport to the site • Provision of amenities on site to reduce the need to travel. GP, school and allotments are all far away. 	<p>The supporting text notes “In addition to the usual planning requirements development will need to address: easement of ordinary watercourse and retention of attenuation features; ecology; trees and hedgerows; archaeology; heritage; air quality; and highways access”. The supporting text also mentions the character of the surrounding area and the Green Wedge.</p> <p>No mention made of biodiversity net gain, public transport, and provision of amenities on site.</p>
SL06	<p>This policy does not provide enough detail to allow it to be appraised. However, based on the site appraisals, the following should be considered for inclusion in the policy:</p> <ul style="list-style-type: none"> • Biodiversity net gain (possibly offsite) for the species-rich grassland, mature trees, possible bat roosts. • Protection of adjacent Evington Park from impacts of development. • Protection of listed buildings on site and nearby conservation area. • Consideration of flooding (there are multiple areas of modelled surface water flooding t the site). 	<p>The supporting text notes “In addition to usual planning requirements development will need to address: surface water flood risk; ecology; heritage; archaeology; trees; air quality; and highways mitigation”</p>
5. Housing		
Ho01	<p>Include a requirement for housing to be in compliance with environmental policies, as Policy Ho02 does.</p>	<p>Ho02’s reference to environmental policies removed;</p>
Ho02	-	<p>and Ho01 unchanged. The listed sites that make the policy have undergone the site assessment which has taken into account</p>

Policy	SA suggestion to improve sustainability	Changes made to policy
		any impact on the environment. Policies CCFR01 (energy and carbon reduction section) and CCFR03 apply to all development including development on allocated sites.
Ho03	It is unclear why c) is limited to "Proposals for wheelchair accessible dwellings, where the Council is responsible for allocating or nominating residents, will be encouraged to meet the technical standard for access of Building Regulations 2015 Part M4(3), or any subsequent revisions". Should the policy be more overarching, e.g. "x% of dwellings will be expected to meet the technical standards..."?	Reworded to "Proposals for wheelchair accessible dwellings will be expected to meet the technical standards... All homes will be expected to meet accessible and adaptable standards..."
Ho04	Can't yet appraise as it does not include % affordable	Now includes 30% affordable target on all major schemes.
Ho05	Increase densities from 50+ in the CDA and 30+ outside the CDA.	Raised to 75+ in the CDA and 35+ outside the CDA.
Ho06	Is this policy adequate to fulfil the requirements of the Self Build and Custom Housebuilding Act, which requires local authorities to give enough suitable development permissions to meet the identified demand for self-build and custom housing? (NPPF para 61 and footnote 26)?	No change. Allocations will make provision for self/custom build on two of the strategic sites.
Ho08	The policy currently doesn't read well. Suggest a rewording to the following (or similar) "New student development will be supported where: a) Occupancy is limited to students in perpetuity; b) It is accessible by sustainable means from the city centre; is within reasonable (10 minutes) walking distance of at least one of the two main university campuses; and it lies outside and does not abut an Article 4 direction area c) A travel plan manages beginning/end of term traffic and parking for all forms of vehicles including bicycles; and d) The development includes communal facilities which are appropriate to the scale of development. e) The previous round of SA suggested encouraging mixed use student/ground floor retail." Also consider requiring student accommodation to be car free; and specifying (higher than average) densities for such development. <i>The policy should not 'limit' the amount of cycle parking!</i>	Most of the proposed wording has been implemented in the policy. The supporting text notes that the Council expects all new student accommodation to have a travel plan that addresses the need for a car parking management plan. No mention of higher densities.
Ho09	Unclear what would happen to 4+ bedroom properties (or don't they exist?)	The policy now states that "Any properties with 4 or more bedrooms will be assessed on their individual merits."
Ho10	Please remove apostrophe in HMO's (should be HMOs)	Removed
Ho11	Include a requirement for new hostels to achieve high energy efficiency standards?	No change. Policy CCFR01 (energy and carbon reduction section) applies to all development including hostels.

Policy	SA suggestion to improve sustainability	Changes made to policy
6. Climate change and flood risk		
CCFR01	<ul style="list-style-type: none"> In introductory text to the chapter, mention the climate emergency which Leicester signed up to in February 2019 Should the policy be more specific about renewable energy than 'as much as possible'? Should any of the measures apply to retrofits and, if so, should that be stated more clearly? 	<p>No change. The Council is preparing an action plan in response to the climate emergency. This policy will be amended at the Reg. 19 stage to reflect the action plan.</p> <p>Policies CCFR01 and CCFR02 do not distinguish between new build development and changes of use.</p>
CCFR02	<ul style="list-style-type: none"> Given that the policy addresses wind turbines in the second paragraph, should the title of the policy be changed to remove 'excluding wind turbines'? Given that a climate emergency has been declared since the first version of this policy, should the policy be more positive about renewables generally than "in consideration of the benefits of the proposal"? For instance, "Taking into account that Leicester City Council has signed an emergency, and in view of the benefits of renewable energy in reducing greenhouse gas emissions, ..." or indeed see comments on CCFR01 where renewables are expected rather than just supported? Should the policy be more positive about wind turbines, e.g. identify possible locations for them on the edge of large new developments? Specifically support installation of renewables on new and refurbished council properties? This would help with regeneration and deprivation. 	<p>'Excluding wind turbines' removed from title</p> <p>No other changes.</p>
CCFR03	<ul style="list-style-type: none"> In a), specify "the <u>National Planning Policy Framework</u> Sequential and Exception tests"? In d), clarify what is meant by 'enhancement to watercourses', for instance "enhancement of watercourses that improve their biodiversity, water quality, the naturalness of the water flow, and the watercourse's attractiveness"... Refer to SuDS being able to be used to provide biodiversity net gain? <p>More clearly specify that brownfield sites in flood prone areas can still accommodate development, subject to mitigation measures (maintenance and emergency access)?</p>	<p>Guidance on the LCC website clarifies what the sequential and exceptions tests are and where they can be found</p> <p>No change in relation to the second bullet point</p> <p>c) reworded to '...providing visual amenity and contribute towards achieving biodiversity net gain...'</p> <p>New paragraph included about previously developed land in flood zone 3b</p>
CCFR01, CCFR02	<i>Merge the two policies as they have considerable overlaps</i>	<p>There are overlaps, however, minimizing whole life-cycle carbon emissions has been separated into its own policy due to the policy's specific and technical criteria. If combined into a single policy with CCFR01, the policy risks becoming over-complicated and difficult to follow.</p>

Policy	SA suggestion to improve sustainability	Changes made to policy
CCFR04	Identify areas where district heating could be particularly relevant, e.g. CDA?	The existing District Heat Network is within the CDA and there is an intended extension of it. Supporting text for the policy at para. 6.13 refers to this
CCFR05	Specifically support installation of renewables on new and refurbished council properties? This would help with regeneration and deprivation.	This chapter's policies support production and use of renewable energy for all properties in the city, applicable equally to council-owned and private properties
7. Health and wellbeing		
HW01	Clarify that existing community sport facilities will be enhanced/protected.	c) changed to include "and protect & enhance where appropriate"
8. Delivering quality places		
	Consider adding reference to 15 minute neighbourhoods in this chapter, supporting policy T03.	Cross references has been made.
DQP01	<ul style="list-style-type: none"> Support the use of low embodied energy materials, reuse/recycling of materials Consider climate change in design, e.g. opportunities for shading, reducing wind impacts Quite a lot of overlap with other policies in this section. Refer to policy DQP05 re. biodiversity policies re. keeping existing trees/hedges/etc. where possible; this also has heritage benefits. Also DQP08 re. waste. 	No change. Policy CCFR01 requires development to demonstrate minimization of energy demand and carbon emissions. Hierarchy includes passive design, building fabric etc.
DQP02	<ul style="list-style-type: none"> Is 'exceptional' standard of architecture really necessary? Seems like a high hurdle. Do include reference to wind impacts. The City of London Corporation has just published rules covering wind assessment: https://www.cityoflondon.gov.uk/services/environment-and-planning/planning/design/Documents/city-of-london-wind-microclimate-guidelines.pdf 	Exceptional standard still required. Reference to wind impacts included.
DQP03	Some overlap with DQP01	Merged with DQP01
DQP04 (formerly DQP05)	<ul style="list-style-type: none"> Unclear what b) means with 'greater': greater than what? Clarify that landscaping should help to design out crime, e.g. https://www.rbkc.gov.uk/pdf/designingoutcrime_spd.pdf? Include consideration of climate change, i.e. increasing drought and flooding, in choice of landscaping? 	'Greater' removed 'Designing out crime' listed at e) New g) discusses how the landscape will mature and climate change
DQP05 (formerly DQP06)	<ul style="list-style-type: none"> Explain what 'tandem development' is. Retain but possibly include criteria in relation to loss of biodiversity 	Term to be added to the glossary. Protection of biodiversity addressed by Policy NE01.
DQP06 (formerly DQP07)	<ul style="list-style-type: none"> Give more weight to cumulative impacts, e.g. "In determining planning applications, the following factors concerning the amenity of existing or proposed residents will be taken into account, <i>both individually and cumulatively with the existing situation</i>". Not sure what "M4i; M4ii; M4iii" means. Does this refer to transportation policies? 	Cumulative impacts mentioned. Reference to M4i etc. removed.
DQP07	Overlap with DQP01 sec. 6e.	From experience a separate

Policy	SA suggestion to improve sustainability	Changes made to policy
(formerly DQP08)		policy on waste and recycling is considered necessary.
DQP11 (formerly DQP12)	Explain what 'Changing Places' toilets are	Explanation added in the supporting text.
9. Central Development Area		
CDA01	<ul style="list-style-type: none"> Consider having higher densities than 50dwh (In addition to the historic environment requirement) encourage reuse of buildings over new build? <i>Reiterate expected building density</i> <i>Explain how biodiversity net gain will be achieved in the CDA</i> 	<p>Appropriateness of densities will be reviewed in light of Red. 18 comments received. Historic environment provisions on demolition/re-use covered in Policy HE01. Policy CCFR01 sets out energy hierarchy. There is no evidence to automatically favour existing building retention over new build in the CDA.</p> <p>Specifics of how biodiversity net gain will be achieved in the CDA will be outlined in individual planning applications and in pre-application discussions</p>
CDA02	<ul style="list-style-type: none"> Higher density development is generally more sustainable. Consider whether building heights can be increased for this reason. More explicitly protect existing biodiversity. Include requirements for flood management, emergency escape routes during flood events etc. Include requirements for energy efficiency and provision of renewable energy, or explicitly refer to other policies that deal with this topic. Include a requirement for provision of public transport infrastructure, and maintenance/enhancement of public transport routes. 	<p>Diagram 04 shows areas where increased density would be appropriate.</p> <p>The other points are addressed through policies DQP02 (tall buildings), NE01 (biodiversity), CCFR03 (flood risk management), CCFR01 and CCFR02 (energy efficiency and renewables).</p>
<i>For CHA01 – ORA04, note in the policy that development should address the following issues</i>		
CHA01	<ul style="list-style-type: none"> <i>Air quality</i> 	Supporting text is clear that all the policies within this chapter need to be used alongside the other policies within the plan that cover these particular matters.
CHA02	<ul style="list-style-type: none"> <i>Conservation area</i> 	
CHA03	<ul style="list-style-type: none"> <i>Listed buildings</i> <i>Conservation area(s)</i> 	
CHA04	<ul style="list-style-type: none"> <i>Listed buildings</i> <i>Conservation area</i> 	
CHA05	<ul style="list-style-type: none"> <i>Air quality</i> 	
CHA07	<ul style="list-style-type: none"> <i>Conservation area</i> <i>Listed buildings</i> <i>Air quality</i> 	
CHA08	<ul style="list-style-type: none"> <i>Listed buildings</i> <i>Conservation area(s)</i> <i>Scheduled ancient monuments</i> <i>Biodiversity</i> <i>Water quality</i> 	
CHA09	<ul style="list-style-type: none"> <i>Listed buildings</i> <i>Conservation area(s)</i> 	
ORA01	<ul style="list-style-type: none"> <i>Local Wildlife Site(s) / biodiversity</i> <i>Flooding</i> 	

Policy	SA suggestion to improve sustainability	Changes made to policy
	<ul style="list-style-type: none"> Water quality 	
ORA02	<ul style="list-style-type: none"> Air quality Water quality Listed buildings Conservation area(s) Local Wildlife Site(s) / biodiversity 	
ORA03	<ul style="list-style-type: none"> Air quality Water quality Listed buildings Conservation area(s) 	
10. Heritage		
11. Culture and tourism		
CT04	Couldn't appraise as unclear whether the site will be museum + wildlife area or museum + P&R	Policy and supporting text now clarify that the P&R is a longer-term possibility. Site is on the route of the Birstall P&R so there is potential for dual use of any car park provided for the museum to also serve as a secondary stopping point for the existing P&R service.
CT02	<i>It is unclear why "single" has been added to now make the policy "Supports single, mixed and multi-purpose uses that maintain community vitality. Remove?</i>	Single has been removed from this wording
CT03	<i>Confirm whether all criteria need to apply ('and') or just one ('or')</i>	Added in as 'or' – just one of the criteria apply
CT04	<ul style="list-style-type: none"> Protect the Local Wildlife Site from development Require part of the energy for the site to be provided through renewables provision on site 	Covered by Climate change and natural environment policies.
CT05	<ul style="list-style-type: none"> Need to reword c) to "would only be acceptable <u>if</u> they do not.." (or <u>where</u>) Encourage the reuse of existing buildings where appropriate The policy says nothing about losing places of worship – should it? Encourage access by walking and cycling 	<p>a) added to state "where they involve the conversion of an existing building"</p> <p>c) (now d)) reworded as suggested.</p> <p>Policy has been amended to retain existing places of worship and to create new places of worship, and to encourage access by walking and cycling</p>
12. Employment		
New E01	<ul style="list-style-type: none"> Require renewable energy generation on site? 	covered by CCFR01, which applies to whole plan.
Former E01	<ul style="list-style-type: none"> The policy only refers to parking, not public transport, walking and cycling; or overloading of the public highway. Should these be requirements? Development is likely to have environmental and social impacts: the policy could/should refer to other plan policies, or put constraints on the circumstances in which development will be permitted 	Reference to parking has been deleted in current version. Otherwise accessibility is covered by Policy T03 and parking by Policy T05. Also covered by policies CCFR01, CCFR02, HW01, HW02 and DQP07. Generally trying to avoid multiple cross-referencing of policies.
Former E02	<ul style="list-style-type: none"> Does the policy need to refer to adequate parking, like Policy E01? Also does it need to more clearly 	

Policy	SA suggestion to improve sustainability	Changes made to policy
	<p>encourage public transport, walking and cycling; and refer to not overloading of the public highway?</p> <ul style="list-style-type: none"> Development is likely to have environmental and social impacts: the policy could/should refer to other plan policies, or put constraints on the circumstances in which development will be permitted 	
Former E03 Policy deleted	<ul style="list-style-type: none"> Reword “D1 uses should not adversely affect residential amenity” to something clearer, eg. “D1 uses will not be supported where they affect residential amenity”. Is “where premises are unsuitable for modern office uses” consistent with government policy, which is of deemed consent for conversion from office to residential (without the ‘unsuitable’ clause)? Would a change from residential to office use be acceptable? <p>Include criteria for improving energy efficiency through redevelopment.</p>	Policy deleted
Former E04	Specify that new development should retain and improve the biodiversity of the area, take into account policy OSSR07 on waterfronts, and protect the heritage and visual amenity of the area?	d) added: “New development needs to focus on the canal and riverside, enhancing their biodiversity and visual amenity...”. Also covered by policies NE01, NE02, OSSR07, HE01, HE02.
E05	Should the policy clearly support the reuse and adaptation of buildings over new-build?	Policy reworded to several times mention “where they involve the conversion of an existing building” or similar. No evidence to automatically favour existing building retention over new build in employment areas.
E06	<ul style="list-style-type: none"> <i>Does the policy need to say anything about retaining buildings and protecting heritage? At the moment it reads like the whole quarter could be torn down and rebuilt.</i> <i>Mention access by non-car modes? Or tighter parking standards?</i> 	
E07	<ul style="list-style-type: none"> To minimise impacts on roads and parking, can the city support businesses to share parking and co-locate? For instance in Oxford there is a large church in a light industrial area: its hours of opening (evenings, weekends) mean that its peak traffic does not coincide with that of the other businesses on the estate; and can businesses and community centres be encouraged to share parking? Particularly encourage businesses that reuse and recycle waste; and/or co-location of businesses where one business can use another business’s waste as a resource? 	The first two points were incorporated in the policy.

Policy	SA suggestion to improve sustainability	Changes made to policy
	<p><i>Should this be the first policy in the employment section? It feels like an overarching policy.</i></p> <p><i>A previous version of this policy also included:</i></p> <ul style="list-style-type: none"> • <i>Co-location of businesses would be supported where this would enable shared car parking</i> • <i>Shared car parking, where places of worship are considering locating in an Employment designation would be strongly welcomed and supported, where it would minimise impacts on surrounding roads and parking. Where the place of worship can share parking with surrounding businesses, this would be encouraged. For instance, where both of the uses' hours of opening (evenings, weekends etc) mean that their peak traffic does not coincide with that of the other, then they are encouraged to share parking.</i> <p><i>That was positive from an SA point of view. Reinstate?</i></p>	<p>These points were not included in the policy</p>
E08	Change 'should' to 'will'?	No change
13. Town centres and retail		
	<p><i>Add reference to 15 minute neighbourhoods in this chapter, supporting policy T03.</i></p>	<p>Some text added on 15 minute neighbourhoods in the transport chapter. The planning team feel that the transport chapter is the best place to address this issue, rather than repeating it in other part of the plan.</p>
TCR02	<p><i>Specify what the impact assessment would need to cover</i></p>	<p>Text has been added to paragraph 13.13 which directs the reader to guidance on undertaking an impact assessment in the NPPF and NPPG and what it needs to cover.</p>
TCR03	<ul style="list-style-type: none"> • Include reference to public/open spaces where people can rest and congregate, to help increase social capital? (Also is reference needed to public toilets/amenities?) • Include reference to reducing/limiting car use and parking in the city centre? • Under 'Hotels', complimentary should be changed to complementary • Under 'Offices', should read '<u>and</u> accommodation for creative industries' • Under 'Housing', specify 'the need <u>for the housing developer</u> to provide suitable mitigation measures'? • Under 'Transport', 'supporting the redevelopment' of what? • Does the policy need to support a hierarchy of uses, e.g. shopping/leisure/office over residential? 	<p>Under Transport, "Supporting the redevelopment of, and improving, bus interchange facilities".</p> <p>Reducing/limiting car use and parking is covered in Ch. 16.</p> <p>No need to set out a hierarchy of uses: the general principle of the uses listed are acceptable in the City centre. The exception is that the central shopping core is the preferred location for retail development.</p>
TCR04	<ul style="list-style-type: none"> • TCR03 includes housing as a main town centre use, but this policy does not include it. Need for consistency? • Does the 'evening economy' section need to mention prevention of crime? 	<p>Policy TCR03 does not identify housing as a main town centre use.</p> <p>Air conditioning etc. would be too much detail for a retail policy</p>

Policy	SA suggestion to improve sustainability	Changes made to policy
	<ul style="list-style-type: none"> For climate change purposes, should the policy say anything about air conditioning and/or door heaters in shops (i.e. limiting their use)? 	– covered in part by CCFR01.
TCR05	The policy lists relatively unsocial town centre uses (massage parlours, betting shops etc.). Should it also actively encourage more ‘positive’ uses, e.g. supermarket, community centre?	No change. The policy is not trying to limit these uses. They are often found in local centres and this is often the better location for them. The second part of the policy sets out standard development management criteria.
TCR06	<ul style="list-style-type: none"> Specify more clearly where the policy applies? The first paragraph refers to ‘centres’, the third one to ‘shopping centres’ Specify that proposals should show how food waste will be stored/managed? 	No change
TCR07	<ul style="list-style-type: none"> Should the policy aim for a particular mixture of services in neighbourhood parades, e.g. at least one food shop, one pharmacy etc? Do expected new neighbourhood parades (e.g. in large new developments) need to be identified somewhere? Are they already? 	<p>This would be very prescriptive. National planning policy is moving towards greater flexibility, and we could not enforce such an approach.</p> <p>The need for new local shopping centres will be considered for the strategic sites through the new retail study.</p>
TCR08	<ul style="list-style-type: none"> Should the last paragraph be c)? The previous SA seemed to assume that the development to which this policy applied would be e.g. a small local store, but could it apply to a large new retail development, e.g. Ikea superstore? If not, specify this? If yes, should there be more criteria related to biodiversity, landscape etc? The previous SA concluded ‘retain but link to DM11 and the retail impact assessment.’ 	No change. The policy could apply to larger retail development. Other plan policies will also apply.
TCR09	Should this policy be merged with TCR08? If not, clarify the difference between the types of shops the two policies apply to?	No change
14. Open space, sports and recreation		
<p>At present the policies read:</p> <ol style="list-style-type: none"> 01. Protect Green Wedges 02. Protect existing open spaces 03. Provide new open spaces 04. Provide new playing pitches 05. Protect existing playing pitches <p>Switch 04 and 05 to be consistent with 02 and 03? Presumably there does not need to be a policy on providing new Green Wedges?</p>		Policies OSSR04 and OSSR05 switched to be consistent
OSSR01	<ul style="list-style-type: none"> For clarity, should the policy specify “Development <u>in Green Wedges</u> will be permitted where...” a) needs to be reworded as ‘predominantly’ not ‘predominately’ Quite a lot of the allocated development sites are in Green Wedges. Presumably that development wouldn’t be expected to meet the policy criteria? Does that need to be stated? 	<p>Changed to ‘in Green Wedges’</p> <p>‘predominantly’ now correct</p> <p>d) now reworded to “It retains, enhances or creates additional open space networks...”. Considering whether it could</p>

Policy	SA suggestion to improve sustainability	Changes made to policy
	<ul style="list-style-type: none"> The policy protects but does not enhance Green Wedges. Can it also include something about supporting proposals that enhance public access to Green Wedges; their use for recreation and biodiversity; their use as SuDS; planting for greenhouse gas fixing? Include some/all types of renewable energy developments as developments permitted in Green Wedges? 	<p>also state “preserves and enhances uses such as open space; sport and recreation; wildlife corridors; improved air quality; and flood alleviation”.</p> <p>No reference to bullet points 3 or 5. Last point covered by policies CCFR01 and CCFR02.</p>
OSSR02	<ul style="list-style-type: none"> I am struggling with the difference between local wildlife sites, Green Wedges, open space and playing pitches. Would open space generally include playing pitches? Wildlife sites? Does this policy, like OSSR01, need to start by explaining the purpose of open space (in part to distinguish the management of open space from the management of Green Wedges)? Several allocated development sites are in open spaces. Presumably that development wouldn't be expected to meet the policy criteria? Does that need to be stated? The policy protects but only gently promotes enhancement of open spaces. Can it be made stronger, e.g. promoting better public access to open spaces (incl. walking and cycle routes); better multifunctional use; promotion for biodiversity, SuDS, planting for greenhouse gas fixing etc? Include some/all types of renewable energy developments as developments permitted in Green Wedges? 	<p>Not changed but discussions are ongoing. Proposed site allocations on existing designations will be supported by a changes document showing the de-designation of the relevant layers.</p> <p>The policy seeks to retain the open space function of a site. The policy to promote the multifunctional uses of all green infrastructure is highlighted in NE04.</p> <p>The last point is covered by policy CCFR02. No specific criteria for Green Wedges considered necessary.</p>
OSSR03	<ul style="list-style-type: none"> (a) is really difficult to understand. Is there an easier metric, e.g. x ha per y new homes? Will all of the new open space be publicly accessible; accessible to everyone in that development; or will (as in some London developments) it be limited to tenants of the market housing? Can/should renewable energy be encouraged on open space, e.g. wind turbines or photovoltaics on the edge of playing fields? Promote new walking and cycling routes in open space (at the moment the policy simply talks about ‘providing routes through the site’ without specifying walking and cycling, or hooking up to the wider network of walking and cycling routes. 	<p>Supporting text changed to “Currently the city council has an adopted standard of 2.88ha of publicly accessible open space per 1000 population”.</p> <p>b) changed to include “and should be publicly accessible”</p> <p>No mention of renewable energy</p> <p>d) reworded to state that “New developments will be expected to be integrated across the site and connect to the wider open space network” (removing any mention of providing routes across the site, i.e. worse not better)</p>
OSSR05 (formerly OSSR04)	Does new development need to be accompanied by a certain number of new playing pitches? If so, explain amount needed.	No change. Policy DI01 covers infrastructure. Need for playing pitches will be considered as part of a planning obligations strategy.
OSSR06	Require new facilities to be easily accessible by walking, cycling and public transport.	No change.

Policy	SA suggestion to improve sustainability	Changes made to policy
OSSR07	<ul style="list-style-type: none"> The previous SA suggested that hydroelectric power could be generated from the waterways??? Encourage the planting of trees along the waterways to improve biodiversity and provide shading to counteract global warming 	No change. Hydroelectric power would be supported by policy NE04 and CCFR02. Policy CCFR01 amended to include power from waterways.
15. The Natural Environment		
NE01	<ul style="list-style-type: none"> Can the policy be rephrased in conjunction with NE02 to emphasise enhancement rather than just protection from harm? Quite a lot of the allocated development sites are in Local Wildlife Sites. Presumably that development wouldn't be expected to meet the policy criteria? Does that need to be stated? 	No change. The policy sees to protect designated sites. The opportunity for enhancement is considered within NE02 biodiversity gain.
NE02	<p><i>The policy really needs to first promote avoidance of impacts on biodiversity, then reduction, and only then compensation in the form of biodiversity net gain. Possible wording could be:</i></p> <p><i>“All developments will avoid biodiversity loss and enhance biodiversity where possible. For any biodiversity lost, developments be required to provide a minimum of 10% biodiversity net gain, as calculated by Natural England’s most recent Biodiversity Metric or successor document.”</i></p> <p><i>Also consider specifying areas of the city where biodiversity gain could be provided offsite, e.g. areas being considered for new green infrastructure</i></p>	Policy wording changed to first promote avoidance
NE03 (formerly NE04)	<ul style="list-style-type: none"> Also include reference to blue infrastructure, i.e. rivers/streams, ponds, lakes, canals Link policy to provision of SuDS and biodiversity net gain 	Blue infrastructure is considered as part of green infrastructure within the NPPG. Consider whether this needs to be clarified within the Local Plan glossary. b) now includes “providing opportunities for biodiversity net gain”.
NE04 (formerly NE03)	<ul style="list-style-type: none"> Can the policy be rephrased in conjunction with NE02 to emphasise enhancement rather than just protection from harm? <i>Rename the policy “Irreplaceable habitat”? At the moment, the title suggests that it is limited to ancient woodland and veteran trees, but the content suggest a much wider application.</i> 	No change in relation to first bullet point. Covered by policy DQP05. Policy name changed to include irreplaceable habitats
16. Transportation (these points relate to the November 2019 policies which have been superseded)		
T01	<ul style="list-style-type: none"> The second (longer) part of this policy sounds like a statement of intent rather than a policy controlling development. Move to supporting text? Also rephrase the first part of the policy to support or restrict development rather than stating that development <i>should</i>... Should the policy (or another policy) say anything about car free development? Policy DQP01 nicely prioritises walking and cycling over the car: “b) ... Create streets which are designed as social 	The policy is a strategic policy intended to support wider transport objectives. Only third bullet point implemented.

Policy	SA suggestion to improve sustainability	Changes made to policy
	spaces that encourage low vehicle speeds <i>where the pedestrians and cyclists come first rather than simply as routes for cars and vehicles to pass through;</i> c) <i>Prioritise walking and cycling by providing routes that are safe, well connected, convenient and accessible for those with all abilities</i> Can/should this policy do the same?	
T02	Again, this feels like a statement of intent rather than a policy controlling development. Does that matter? For instance, should the last bullet point state “Applications for new developments will be required to be accompanied by an air quality assessment where the development (and then stuff about being in/near an AQMA, development being over a certain size etc.)”?	New bullet point about air quality assessment included
T03	Include retail centres, city centre and local centres in the list at ‘Cycling d’.	Done in full
T04	Is ‘of the highest design quality’, ‘the least impact’ etc. too onerous? Is ‘of a high design quality’ and/or ‘minimal impact’ good enough?	Rephrased as “Are of a high design quality”
T05	<ul style="list-style-type: none"> This is a long policy to deal with an essential balancing process: of providing enough but not too many parking places. Should the second paragraph (and indeed the entire policy) be more restrictive/ ambitious, aiming to reduced (or at least not increase) car parking, rather than letting it reluctantly grow? The previous SA suggested renaming the policy ‘New Car Parks’ Should f) be part of T02 on improving air quality? 	f) moved to T02. The sentence “In general, new car parking provision should be kept to a minimum within the City Centre” moved up. The policy seeks to balance considerations relating to parking. An SPD will amplify.
T06	Should P&R sites also include charging points? Does that need to be specified?	Reference to electric vehicle charging points included at T04.
16. Transport (2022 Reg. 19 plan version)		
T01	<i>Should this or another policy in this chapter say more about e-car and e-bike charging? Car free housing?</i>	Amendments made to supporting text highlighting the importance of e-bike.
T02	<ul style="list-style-type: none"> <i>a) overlaps with Policy T01a) – reduce overlap?</i> <i>Be clearer about what is meant by ‘make provision for zero emission vehicles’, as the other policies don’t explain this</i> 	Policy overlap not reduced, but text amended to “increasing the uptake of low emission vehicles, by requiring new development to make provision for zero emission vehicle”
T03	<ul style="list-style-type: none"> <i>It would be helpful to specify whether 15 minutes refers to walking or cycling. The two are very different.</i> <i>This policy seems to overlap a lot with policy T01. In particular, c) and j) above overlap with T01a, T02a and T06a. Reduce the overlap?</i> 	Description added to glossary about what we mean by 15 min neighborhood. Overlap not changed.
T04	<i>Support electric charging points at P&R sites.</i>	Supporting text has been amended.
T05	<i>Suggest rephrasing “To meet the needs” rather than “To ensure the needs”</i>	Amended as suggested
T06	<ul style="list-style-type: none"> <i>a) above overlaps with T01a, T02a, and T03c and j. In a way it’s good for the issue to be so consistently stressed but it does lead to overlap</i> <i>Is there any reason why some housing in Leicester shouldn’t be car free? Should that be encouraged?</i> 	Policies have been amended. The policies support car free developments but also we need to be aware of the NPPF requirements around adequate car parking provision.

Policy	SA suggestion to improve sustainability	Changes made to policy
17. Future minerals and waste needs		
FMWN01	Encourage or require development to be on brownfield land?	New criterion i: "New waste development should be on brownfield land where possible"
FMWN02	Encourage or require development to be on brownfield land?	No change. Policy to be read alongside FMWN01.
FMWN03	Suspected typos for the first set of b) and c).	No change.
18. Development and infrastructure		
DI01	<ul style="list-style-type: none"> a) and b) don't have a sentence to introduce them. In the previous version of this policy they came after the first paragraph. The policy does not specify or list the types of actions that the developer contributions will be used for. Affordable housing has traditionally been given priority. If this continues to be the case, then most of the other benefits will not materialise. Does the policy need to include a list of priorities, or of the actions that would be expected? 	No change. The policy will be refined and could reinstate the introductory sentences.
DI02	<i>Give greater protection in the policy to the setting of listed buildings and to archaeology</i>	No change
20. Planning enforcement		