



# STONEY STANTON PARISH COUNCIL

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## **Response to the Blaby District Council - New Local Plan Options Document Options for Spatial Strategy, Sites and Strategic Policies – January 2021**

### **Introduction**

This consultation response relates to the strategic options that Blaby District Council have put forward in their New Local Plan Options Consultation (January – March 2021).

The Local Plan Regulation 18 consultation follows a call for sites exercise ending in May 2019 and a first Regulation 18 consultation ending in September 2019.

Stoney Stanton Parish Council (SSPC) wish to raise comments on the strategic sites and general direction of the strategic growth proposals outlined in this latest Regulation 18 Local Plan consultation.

This response will set out the context and initial comments, followed by addressing some of the most relevant questions asked in the Local Plan Consultation document.

### **Context**

It is recognised that Blaby District Council (BDC) have to plan for a portion of unmet need arising from housing that is unable to be provided within the Leicester City Council administrative area.

It is understood that work is still ongoing to declare the unmet need figure and it is likely to be higher than the 7,800 dwellings declared through the Leicester City Council Draft Local Plan, due to an Indicative Revised Housing Methodology published by the Government in December 2020.

The proportion of unmet need has been suggested to be anything from 7,800, to 12,000 dwellings up to 2038.

The Leicester and Leicestershire Strategic Growth Plan (SGP, 2018) was jointly prepared by the nine Council Authorities in Leicestershire to set out a strategy for growth and development up to 2050. It proposes the following;

- Focusing growth in areas close to existing employment clusters and opportunities and new infrastructure proposals;
- Focusing growth in major strategic locations and to reduce the amount that takes place in existing towns, villages and rural areas;
- Five key growth areas are identified. Those relevant to Blaby District are:

- Leicester: Our Central City, the A46 Priority Growth Corridor and the A5 Improvement Corridor;
- Delivery of the strategic growth areas will be as 21st Century garden towns, villages and suburbs. New housing and employment will be planned together with new and improved roads, public transport, schools, health services, local shops and open space.

The Blaby District Growth Plan (2019) sets out the six fundamental key principles for designing and delivering development;

- Infrastructure led;
- Integrated and self-sustaining;
- Active and healthy;
- Well designed;
- Well connected; and
- Accessible for employment, business and skills

Whilst neither of the above evidence bases are statutory documents, both the District Growth Plan and the Leicester and Leicestershire Strategic Growth Plan (SGC) 2018 have formed the basic framework to guide the new Blaby Local Plan.

Table 1 of the new Local Plan sets out the potential housing requirements for the district using the standard methodology as well as two different levels of unmet need. Ideally BDC will accept option 1 – giving a total housing requirement of 6441 up to 2038. However, if it is pre-ordained that BDC will have to accept the growth from Leicester City Council, option 2 is preferred out of the remaining two. This would result in a housing requirement of 9000, up to 2038; the lower of the two unmet need figures. Only under strong justification and evidence base should the highest of three figures be required (option 3).

It is crucial that BDC, Leicester City Council and the Leicestershire Local Authorities identify the exact figure of unmet need that is required to be addressed. Prior to this agreement, it will be very difficult for the plan to progress with identifying options for growth.

### **Initial Comments**

Consulting on the new Local Plan during a pandemic is complex, but this is likely to have disadvantaged local residents without access to the internet, including many elderly people. There has been no provision by Blaby District Council to promote this Local Plan Consultation to residents of the communities in the District. There is no option of printed documents to these disadvantaged residents which means responses will be minimised and the result will be an inaccurate and perhaps minimal response to this very important document.

The PUA of Leicester City seems to be expanding only in the direction of Blaby. The rationale for BDC taking so many of the unmet housing need is not clearly laid out. It is imperative that a Statement of Common Ground is set out and agreed as soon as possible, to enable the new Local Plan to effectively plan for the correct amount of housing and employment growth.

Careful consideration should also be given to neighbouring local authorities in respect of their plans for growth. For example, on the border between BDC and Hinckley and Bosworth there are growth plans for a significant number of houses.

### **BDC Settlement Audit and Hierarchy Report (2020)**

There are some key parts of this document that need further work and/or clarity including the following.

Section 6.12 details areas that have access to all services and facilities, however the approach appears to be on the presence of the facility as opposed to the availability. This does not take into account oversubscribed services or facilities that are unable to expand.

Section 8.1 makes reference to travelling 'substantial distances' but fails to detail exactly what counts as a substantial distance. Quantitative measures should be used.

Section 8.2 uses the 'Blaby District: Assessment of Key Employment Sites Report' (2016) but does not take into account the number of jobs that the site generates or the current availability of jobs at the site. A site that is already at capacity with no vacancies should not be considered as able to accommodate substantial employment opportunities. This paragraph directly conflicts with the appraisal of the village on page 32. It is also suggested that a more up-to-date evidence base is used in assessments.

Page 32 Appraisal of Stoney Stanton directly conflicts with paragraph 8.2 by stating that there are no Key Employment Sites within the village. This is inconsistent.

Whilst it has a doctor's surgery, this is already oversubscribed and BDC have confirmed by letter they have been aware of this from 2013 onwards in multiple communications. There is indeed superfast broadband in the village, but this is again oversubscribed, and large areas of the existing settlement are unable to access it due to volume constraints. The primary school is already oversubscribed and sees pupils from the village being sent to other schools due to capacity issues. On this basis the village is not suitable for further growth and is already over developed for the number of homes that should be delivered by 2029 under the existing adopted Local Plan without the provision of additional upfront infrastructure investment.

The method of evaluating for growth is flawed if it merely looks at what services are present rather than those that are available. Further growth will exacerbate the current lack of availability and lead to degradation of the service to existing households in the settlement.

### **Stoney Stanton Parish Site Assessments (Appendix 6)**

Page 47 of the consultation document states that none of the proposed developments are in the area of separation. This appears to be incorrect as STO016 and the eastern portion of STO026 to the west of Hinckley Road are within this area.

All sites show "Good Access to Health Care" as a positive factor, however whilst there is a health centre in the village it is oversubscribed and at the limit of patients that they can care for. This should not be a positive just because the facility exists.

Many sites state "Good Access to Primary School"; the school is fully subscribed with many village residents having to enrol pupils in schools further afield. This should only be a positive if the facility exists and has availability.

Many sites state "good access to... open space". Much of the open space that has public access may be consumed by the proposed developments, so these statements are subjective.

All sites need to have an assessment completed for flooding. Severe flooding occurred on 1 October 2019 and the watercourse has been described by professionals as one of the most complex they have come across. Opposition has been provided to application 20/0835/RM by both the Parish Council and Village Flood Group, the concerns and issues raised in this response are the same for all of the potential development sites due to the possible implications on the homes already in the village.

STO02 – This is immediately to the rear of homes and would form the area of separation for the large SDA if it goes ahead.

STO09 – This is to the north of the village and directly next to the proposal for 20/0835/RM (BDC) where some of this land is proposed to be used for access, etc. Also, it will have a potential route for traffic to bypass the village in the SDA proposal. It is also directly next to the access to Calor gas with HGV vehicles operating 20 hours per day. This site is also directly on the border of the exclusion zone for Calor gas which is appropriate for residential homes.

STO016 – This is within the area of separation, extends the village to the south, towards Sapcote is near the route of the proposed SDA bypass road and has poor access onto Hinckley Road.

STO19 – Same comments as above but is within the exclusion zone for Calor gas.

STO23 – Poor access to site either through Clint Hill, Middleton Close or Abbot Drive (end of Clint Hill). This will add traffic onto an already poor junction to Long Street, the site of multiple accidents, and also the roundabout to the centre of the village.

STO025 – The land appears on the route of the proposed road to the south of the village via the SDA. Developing the land here would extend the village boundary by a significant size to the east and linked with STO014 will be detrimental to the village and be completely out of the way of all developments either existing or proposed.

STO026 – SDA Area. It appears that the land to the east of Hinckley Road is double counted, it also appears under the Sapcote, Nuttingmore Farm proposal

The consultation document asks a number of questions. The key questions relating to SSPC are addressed as follows.

**Q1: Do you think that the Strategic Objectives are suitable aims for the future of the District?**

It is noted that the emerging strategic objectives are split into three different aspects, as per national planning policy; social, environmental and economic. We would advise that these are basic objectives at this point and will relate to how strategic sites are allocated in future revisions of the plan.

In particular, the social objective to direct new growth to the most sustainable locations is supported, as well as to create and sustain strong, active healthy and inclusive communities which have access to facilities. However, new growth should only be created where there is a clear demonstration that the surrounding area can sustain the level of growth proposed.

The environmental objectives are supported that state: to protect new and existing communities from harmful effects that poor air quality causes, particularly in designated 'Air Quality Management Areas', by seeking to reduce emissions of pollutants that contribute to poor air quality (mainly from traffic). Other environmental objectives that are supported include making efficient use of land, ensuring that the District's most valued natural assets are protected, ensuring that towns, villages and countryside benefit from high quality design for all new developments which result in high quality and safe places to live, work and visit as well as protecting and enhancing the local character and distinctiveness of Blaby's towns and villages.

The environmental objectives will be challenged by some of the larger strategic growth options such as those around the M69 junction 2 which will remove primarily green fields and farmland.

Further details and explanation on how BDC will balance the loss of the 'best and most versatile land' versus development needs is required.

Main growth areas should be within the PUA first, and then the extended PUA, as this is where the need is most required. Other growth should be spread around the county, and Blaby District, to prevent rural areas from being urbanised.

Where possible, housing to fulfil the unmet demand from Leicester City should be kept close to Leicester City, as that is where it is required. Extending the Principal Area should be minimised and greater utilisation of existing land within the City should be investigated such as increasing density by extending buildings upwards and re-development of existing brownfield sites.

**Q2: Do you consider that Blaby District meet only its own employment needs or contribute to meeting the needs of other areas in Leicester and Leicestershire?**

It is considered that Blaby District should meet only its own employment needs and only contribute to meeting the needs of other Leicestershire Authorities where absolutely necessary. Large employment sites are already consented and being built out within the district and the proposals within this new Local Plan would create large additional employment areas by way of strategic growth, sustainable urban extensions and potential new settlements.

Any new employment areas should consider the Housing and Economic Development Needs Assessment (HEDNA 2017) which identifies a need for B1a and B1b office space. For industrial floorspace (B8), there tends to be a poor correlation between past employment and floorspace trends, whereby job numbers have fallen but floorspace numbers have not necessarily (influenced by capital investment and productivity improvements). The Planned Growth Scenario envisages that manufacturing GVA grows strongly (1.7% pa GVA growth 2015-36) and on this basis it is appropriate to plan for additional manufacturing floorspace. The HEDNA concludes that greater weight should therefore be given to the completions trend for B1c/B2 floorspace.

**Q3: Do you agree with the proposed Settlement Hierarchy?**

Stoney Stanton carries a proposed designation of a Medium Village based on the findings from the Council's Settlement Audit and Hierarchy Report (2020). It is acknowledged that the village does have facilities such as a doctor's surgery, shops and primary school. However, it must be noted that this does not automatically make the village a sustainable location for growth. The doctor's surgery and Manorfield Primary School have been over-subscribed for a number of years.

The neighbouring village of Sapcote is also classed as a Medium Village and has a similar amount of services to Stoney Stanton. Sapcote relies on the doctor's surgery at Stoney Stanton, which is already too small to accommodate patients from both villages (and other surrounding villages) effectively.

This is a key concern of SSPC, in that it does not want to receive additional development where it does not contribute and/or enhance local services.

The road network of Stoney Stanton is also inadequate to be able to accommodate large levels of growth around the village. The central junction of the village is a mini-roundabout with exceptionally poor visibility due to the historic character of the centre of the village, with buildings having little set-back from the highway. This results in very slow traffic movements at peak times, which will be significantly exacerbated by anything greater than small levels of growth.

**Q4: Do you consider that the Locational Strategy should include Strategic Sites where there are higher levels of growth?**

The level of growth has not yet been confirmed as the level of unmet need is still to be agreed. The figure of unmet need is essential to inform a robust approach to propose strategic and non-strategic sites.

It is likely that a higher level of growth will be required than first estimated due to the unmet need. It therefore may be appropriate for strategic sites to be included, but only where they are accompanied by appropriate site assessments and evidence base and provide infrastructure, services and facilities for communities, without putting additional pressure on existing services or changing the character of existing villages.

If strategic sites are proposed, they need to be carefully planned to be sustainable with appropriate timescales built in from the outset. This is to avoid any vacancy rates, build-out delays and potential viability issues. The size and scale of these sites is very important, as is ensuring that no additional pressure is put on existing village roads.

**Q5: Do you consider that a range of smaller and medium sites located across a settlement hierarchy will also be needed to ensure the delivery of the total housing requirement?**

It is considered that sites of a range of varied sizes and scales will need to be proposed, including small and medium sites. The growth should be considered holistically, where areas are unable to adopt larger strategic developments, due to a significant impact on the landscape, infrastructure, or character of the area, small and medium sites could be considered. As put forward above, any proposed sites should be considered holistically and should have the benefit of a full site assessment clearly demonstrating why a site is preferred. This should be informed by an agreed Statement of Common Ground to identify the unmet need figure. It is important that proposed sites small, medium or strategic must not have a negative impact on an existing settlement.

Development planned in neighbouring districts within Leicestershire must also be carefully considered, as this will also have an impact on traffic movements, landscape, air quality and sustainability for existing and proposed sites within Blaby district.

If smaller sites are proposed, these must be carefully considered and a specific need should be identified in that area. Sites on the edge of villages should not be proposed just because they are available for development. This is a key concern for SSPC, specifically with regard to potential small sites at the edge of the village. Even small sites will have an impact on the village's existing services, and infrastructure.

It is considered that Stoney Stanton has fulfilled its housing requirements for the plan period up to 2029. This is demonstrated in the Fosse Villages Neighbourhood Plan (2018-2029) where the minimum housing provision for Stoney Stanton is set out as 320 dwellings up to 2029. The total dwellings built and committed as of 31 March 2017 was 467 resulting in an oversupply of 147 dwellings. These have consisted mainly of small and medium sites, as well as windfall sites.

**Q6: How should we diversify the housing market in the District to meet the requirement to provide more housing on smaller sites (less than one hectare in size)?**

There should be resistance to building lots of very small homes just to meet an arbitrary number: any development area should include a range of smaller and medium sized builds of good quality.

If smaller sites are used, it is necessary to consider whether there is an actual need for housing in that area. Just because a small piece of land is made available on the edge of a village, does not always mean it is a good place to build further.

Stoney Stanton has more than fulfilled its own housing requirements to the Council for the next 9 years so would not want to see more housing on smaller sites around the village. It is a village that does not have the infrastructure in place to support more growth.

The previous plan mentioned 'self-build' as an option, so designating land for self-build as well as for small house builders, could diversify delivery across the District as a whole.

**Q8: What do you think about the proposed policy approach to urban design quality and place-making?**

It is important that the identified Area of Separation (AoS) between Stoney Stanton and Sapcote remains. This area must remain open, as identified in policy to ensure the character and identity of individual settlements is maintained by preventing them from merging. Any development which would result in a reduction of the separation between these built-up areas is strongly resisted – this would include new road links as this still has the effect of subdividing the space between the villages into smaller parcels that erodes the perception of the separation. This is particularly important given that the space has been eroded more recently with the development of residential sites in Sapcote.

SSPC are vehemently opposed to the changing of terminology or status of these areas around the village.

**Q9: What do you think about the proposed policy approach to mitigating and adapting to climate change?**

It is vital the policy demonstrates a strong commitment to minimising the environmental impacts of any new developments.

Mitigating and adapting to climate change is a key factor along with protecting the environment and considering health and well-being. These essential objectives seem totally incompatible with what is being proposed - huge developments around Stoney Stanton and Whetstone that threaten to destroy local ecosystems, while at the same time increasing pollutions; air, noise, light and environmental and traffic levels.

A local approach is definitely needed for flooding risk assessments, and developments should be not planned on flood plains or where a substantive amount of water is already absorbed by existing plants and trees.

Decimation of forest and woodland cannot be replaced by short term measures, with token gestures of planting new trees; it takes decades for trees and woodland to become established and have a significant positive impact on the environment.

Reasonable public transport links should be in place for existing sites before any further development work starts on new sites.

**Q10: What do you think about the proposed policy approach to flood risk?**

The approach as detailed in the proposal is significantly lacking. There is nothing to describe how existing settlements will be assessed. The impact of building on sites needs to fully understand how

these will impact the existing settlements especially where the water systems are complex and poorly understood by the managing authorities.

There are references to a 'New Strategic Flood Risk Assessment' however there is no link to this to understand the relevance and scrutinise how this has been completed. On contacting BDC, the new assessment is still a work in progress so has not been published so commenting on this section is not possible. The existing Flood Policy is flawed and fails to identify key areas where flooding is a risk either fluvial or surface.

Where there is a known flood risk or a complex water system that could lead to flooding of neighbouring developments this should be noted within the negative section of the evaluation of each site, as to risk existing settlements is not acceptable.

Section 6.2.2 states that 'flood risk is included as a consideration in the site selection work. This will enable the sequential test for flood risk to be determined'. However, there is no criteria or method stated as to how this will be considered and evaluated.

#### **Q11: What do you think about the proposed policy approach to biodiversity and geodiversity?**

The policy approach does not address the bullet points listed in the Biodiversity and Geodiversity section.

Monitoring the progress of the Environmental Bill and assessing the quality and quantity of assets does not express any commitment to protecting them.

It is also a contradiction to the amount of farmland identified in the SHELLAA 2019 document that could be developed – reducing biodiversity.

Biodiversity Net Gain is mentioned several times throughout the document but as a target; it does not protect the destruction of existing woodland and trees in areas of great biodiversity.

It implies that any natural and best land could be destroyed – as long as there is a designated area somewhere with a negligible 'net gain' to compensate for the loss.

Particularly on this policy, BDC should proactively share the biodiversity and geodiversity studies with all residents in the district. Each village should be notified of the impacts on their village 'assets'.

#### **Q12: What do you think about the proposed policy approach to heritage assets?**

Protecting all heritage assets and as much of our farmland as possible – whether ancient or historic or not – should be the policy. Areas that are of historic importance including ridge and furrow, buildings and key features of existing settlements that are key to the history of an area must be preserved without question.

The SHELLAA document is contradictory to 'protect ancient and historic farmland' as it sets out the potential loss of significant farmland just outside the Stoney Stanton village.

#### **Q13: What do you think about the proposed policy approach to environmental quality?**

Environmental issues need to be more than a 'consideration' and instead should be key factors in the site selection process. Very concerned that 'unacceptable adverse effects' are not enough to prevent development; this does not seem to rate environmental quality very high on the agenda.

It is difficult to see how the policy aims can be justified with the SDA proposition, particularly in respect of air, noise and light pollution. Trebling the number of homes in Stoney Stanton is going to treble the environmental impact. 1000s of new properties will significantly increase the amount of cars and traffic on the roads.

BDC need to ensure that very accurate environmental studies are undertaken before any development is considered. The information used to assess pollution etc should be recent and comprehensive in scope.

This information should be shared proactively with the residents – for their comments and views ahead of any public consultation.

#### **Q14: How can the Local Plan best assist in the delivery of healthy communities?**

By keeping the integrity of the specific area and not overburdening present infrastructure further. In this respect, Stoney Stanton is already struggling to cope. There should be a policy of maintaining space between settlements. Where these are already in place, they must be respected, and development must not be allowed on these spaces in any circumstances.

By addressing the health care needs of the population and resourcing it adequately. The existing facilities need to be assessed not only that they exist, but also have the capacity to be able to cope with the existing population, and where these have been left under resourced by previous development these issues must be highlighted as further growth without the investment in the existing communities will be significantly detrimental.

By maintaining access to local open spaces within walking distance of one's home, to enjoy the natural environment – vital to wellbeing. This has been particularly apparent during lockdown periods due to the pandemic. The ability to walk from people's homes is important and understanding why people live in the existing areas is key, displacing existing residents who do not wish to live in expanding developments or near new large sites must be understood.

By encouraging people to walk on existing public footpaths without having to drive to a start point. Stoney Stanton has lost a number of green spaces already – and what is left is threatened in the options document. The SDAs having walkways and cycle paths will not make up for the extensive loss of farmland. By lowering traffic levels and traffic pollution is a key consideration, however the impact during the development of these facilities must be taken into consideration as all of the material will come through the road network. Also, on large developments there will likely be significant numbers of heavy machinery where the exhaust emissions are not controlled in the same manner as road going vehicles. The management of dust and noise must be a key consideration, noting predominant wind direction to existing settlements etc and fully mitigating the impacts.

By having designated areas that prevent haulier traffic, especially where new infrastructure is being planned, this should take traffic of all types away from the existing communities and have measures in place to prevent the existing road network from being used by heavy vehicles and traffic from new settlements.

#### **Q15: What specific health-related requirements would you wish to incorporate in the Local Plan and its policies?**

The existing settlements need to be assessed for the capacity of existing services/facilities before any further development is added. For example, the doctors surgery is oversubscribed from expansion in the past that has not contributed to the settlement. New development should not continue this trend.

Committing not to increase any form of pollution, especially that from noise and air must be a priority. The adoption of schemes to have access to EV charge points, solar electric generation and other “green” technologies must form part of the framework for any further development. This will also need investment from the District and County Councils with correct policy to ensure the role out is effective.

**Q16: What do you think about the proposed policy approach to Green Infrastructure?**

What is noted in the supporting documentation is inadequate given the scale of the proposed housing numbers. There is no commitment within the documentation to support this. Supporting and having public transport is important, but in all major studies this only has a small impact on the number of people who use it, people still want to use their private vehicles predominately. Therefore, the policy needs to include how the use of “greener” vehicle with little or no point of use emissions, and how this will be supported by the District Council.

BDC need to make a clear document that can be referenced rather than the multiple documents in existence that contradict each other. The aim of what is trying to be achieved should be explicit and clear, and how this will be executed laid out in detail.

**Q17: What do you think about the proposed policy approach to open space, sport and recreation?**

The points made in ‘what you told us’ section are very relevant; the provision of open spaces in any new developments is essential. Proper planning should be carried out right from the start to ensure plans provide areas for play, sport, walking and cycling – and allow existing wildlife to continue to co-exist with new building projects.

The evaluation of Local Green Space and giving protection to these spaces is paramount, there are other sites within the call for sites, that will impact the other areas far less than those proposed around Stoney Stanton and meet the housing needs of BDC. The need for development should come second to the preservation of green space that is valued by existing communities, this must be preserved.

**Q18: What do you think about the proposed approach for the designation of Local Green Spaces being undertaken through Neighbourhood Plans?**

The designation in the proposed Local Plan appears to be good and encompasses the spaces already in space in Stoney Stanton. There must be no development in and around areas of separation. The documents for call for sites appear to be poorly reviewed as a site in the area of separation between Stoney Stanton and Sapcote is covered by two different references.

Green space is paramount to the identity of the village and the surrounding area, this must be maintained and development must be considered in line with what has already been developed and how further growth will have no impact on the existing settlements.

**Q19: What do you think about the proposed policy approach to affordable housing?**

The definition and requirements of affordable housing must be clearly set out, including which types of affordable homes and how the numbers will be determined.

This must be completed based on what the needs are in the local area, not those of neighbouring boroughs ie Leicester City. Affordable homes must be spread throughout the district and working with neighbouring districts to achieve a good spread to enable people to settle near to areas they have lived in through childhood or have previously rented accommodation. The housing must be sold to people to live in and not to those on a commercial basis to rent out, this must form part of the legal deeds of the homes.

The aim would be to enforce the developers to supply truly affordable houses. The NPPF defines affordability as being 20% below market values – whereas affordability ought to be related to maybe the lower quartile of the annual earnings profile for the area.

**Q20: What do you think about the proposed policy approach to the mix of housing?**

Again, assessment of need is vital, using local data when planning developments. A mix of housing is generally a good idea and should apply to all new developments. A given proportion of new homes should be “affordable” and accessible to first time buyers. Question 19 answers apply to this question.

**Q21: What do you think about the proposed policy approach to older persons and specialist housing?**

For some people with mobility issues, bungalows are the best and only viable option. Also, they are cheaper to build and because there are fewer built, the demand for them remains, and they can retain their value well.

Undertaking a viability plan to also assess any need for assisted living/retirement villages will be important and ensure this is of high quality and meets the needs of the population which it will serve. The village already has a successful development of homes for the elderly and expansion of this type of home should be considered.

**Q22: What do you think about the proposed policy approach to accommodating Gypsies and Travellers?**

An assessment of need should be carried out first but assessing the needs of a partially transient population is difficult.

Discussion of sites should take place with total transparency between the Gypsies and Travellers and local residents that may be affected, to find a satisfactory solution for everyone and avoid future disputes.

**Q23: How can the Local Plan best deliver the necessary employment land and premises required to meet identified needs?**

It is noted that the distribution of unmet employment need still requires identifying and agreeing. The New Local Plan has identified that significant additional evidence base needs preparing to support any employment proposals and policies.

SSPC have concerns regarding the amount and scale of employment land that is consented and already proposed nearby. It is evident that there is an abundance of B8 Warehousing that has been recently built. It is important to provide a variety of employment uses to ensure future flexibility and sustainability. The concern with the amount of B8 warehousing is that there is a higher level of low skilled jobs being provided, where a greater mix of job types and use classes should be sought, including office uses, small business units and areas of start-up business.

Employment land for warehousing and light industrial units should ensure that additional traffic generated does not pass through the villages.

Even with the small number of employment units within Stoney Stanton, big issues are created with articulated lorries attempting to navigate the village centre. The village and surrounding area are not appropriate for large scale employment uses.

The HEDNA identifies a need for B1a and B1b office space and a lower ratio of jobs provision created by B8 development. The Planned Growth Scenario envisages that manufacturing GVA grows strongly (1.7% pa GVA growth 2015-36) and on this basis it is appropriate to plan for additional manufacturing floorspace. The HEDNA concludes that greater weight should therefore be given to the completions trend for B1c/B2 floorspace. This emphasises the need for smaller commercial buildings in appropriate, sustainable locations.

**Q24: Are there any specific sites that you consider are suitable to deliver the employment land required?**

There are suitable areas available within Blaby District such as near the M1/M69 Junction and also along the A5. These have recently seen massive expansion over previous farm fields and are changing the appearance of the area. They are also adding huge amounts of HGV traffic to the local areas that will detrimentally affect the already poor air quality.

Ensure that both existing, and any new businesses are strictly controlled in terms of environmental pollution, including noise and light pollution.

Sites EELM001 and EAST001 are wholly unsuitable for the provision of employment due to their sensitive landscape and biodiversity designations including SSSI. They are also poorly related to existing settlements, giving rise to issues over sustainability.

**Q25: Are there any employment related requirements you would like to see incorporated in the Local Plan and its policies?**

Supporting small businesses is key and having space for them to operate is important. These spaces should be supported with good transport links, not bringing traffic through existing settlements, etc. There are already good examples of this being achieved in the District in locations within a mile of the settlement but not affecting it with traffic and pollution.

**Q26: What do you think about the proposed policy approach to retail, leisure and town centre uses?**

Supporting local towns is key, the building of further expansions of the likes of Meridian and Fosse Park should be minimised as these are detrimental to the local town and city centres. More support should be featured to ensure the viability and vitality of local shops and businesses, as well as attracting businesses that add to the high street such as independent shops, cafes and restaurants that encourage people to come to an area. Market Harborough and Market Bosworth do this really well, there is nothing similar within BDC.

The policy needs to be far more explicit in its aims and how these will be achieved. Many of the statements and comments are contradictory to other documents and policies and lead to confusion.

**Q27: Are there any tourism related requirements you would like to see included in the Local Plan and its policies?**

In the 'what you told us' section on Tourism, it states 'joint working with other districts should be pursued'. This should be part of the plan – and include for example Battle of Bosworth Country Park, its Heritage Centre; Hinckley Museum and Leicestershire Round Circular Path.

BDC should give a commitment to the permanent protection of local nature areas and country parks and their environs. Burbage Woods and Common would be adversely affected by the HNRFI.

District and County wide green initiatives could be held to encourage local people and visitors to the area to spend time outdoors and connect with their local environment and tourist areas.

#### **Q28: What do you think about the proposed policy approach to transport issues?**

The New Local Plan does not put forward a detailed policy approach to transport issues at this stage. It is recognised that there is significant additional work required to be carried out to such as modelling assessments to better inform preferred locations for growth.

The New Local Plan should consider the existing transport infrastructure. For example, any upgrading or provision of new roads around villages is likely to shift congestion onto the next village and cause additional congestion at key junctions.

With regard to specific proposals, when considering the Strategic Growth Plan, Road Improvement 3 (A46 Expressway [route to be defined]) is considered to have the biggest positive impact in terms of addressing existing transport issues as well as having the potential to alleviate issues arising from future growth. This route would complete the link round around Leicester, address traffic issues within the city and to area to the east, whilst providing additional connectivity for Blaby.

Road Improvement 3 would also open up land for housing and employment development, as well as improving traffic flow around the city. For example, this would make site WHE027 a sustainable site, with good transport and infrastructure links. This is one of the larger strategic housing sites put forward in the Plan and could take a large portion of the unmet housing need, as well as incorporating employment.

This is a growth plan which nine authorities have signed up to. It is part of a growth strategy to unlock growth long term for Leicestershire. In terms of development which will help support the delivery of the growth, site WHE207 is a logical strategic approach which can fund the infrastructure for the wider area as the site develops. The alternative large site to the west of Stoney Stanton cannot be accommodated in such an easy manner. Initial concepts suggests the need to provide bypass roads around the north and south of the existing settlement, compromising its visual setting and still being likely to result in traffic traversing the village anyway.

#### **Q29: Are there any specific transport issues that the Local Plan should address?**

As answered above, the current transport issues need to be dealt with alongside any proposals for transport improvement. The proposed Road Improvement 3 appears to be the best from of infrastructure improvement that will address current issues and allow for expansion and growth to the south of the city, along the proposed infrastructure routing.

Village centres such as Stoney Stanton will experience an increase in traffic levels with the level of growth proposed within the district. The road improvements will require careful consideration regarding where they can be developed as this will cause the biggest changes to the district. If achieved effectively, the road network can be improved at the same time as unlocking land for development.

Currently, at peak times traffic stacks up quickly at the Mill on the Soar junction from Stoney Stanton onto the B4114. The response to the HNRFI Consultation and Planning is attached that details many of the concerns that must be understood.

Improve A5 between Magna Park and Hinckley M69 Junction. If the proposed HNRFI and SDA go ahead it will massively impact and increase traffic levels in the area and particularly the village - with the high number of HGVs, getting on and off the motorway. Also, thousands of extra vehicles – possibly on average 2 cars per house, all needing to use the road network.

It is difficult to see there is any amount of mitigation possible that will protect the villages of Sapcote and Stoney Stanton from the scale and size of HNRFI and the proposed SDA.

Some mitigation may well be presented by building new roads, but these should be well designed and not cover areas of separation between Stoney Stanton and Sapcote and not force a problem onto another part of the village.

If building permission is granted for the Highfields Farm industrial site near the Calor gas site, then this will exacerbate the traffic levels which are already extremely busy.

Other large sites at Whetstone Pastures have significant advantages over any of those planned around Stoney Stanton as the impact on the number of people will be significantly less, it has access to the M1 built in and forms the first node of the A46 ringroad – ‘Road Improvement 3’.

### **Q30: What do you think about the proposed policy approach to provision of infrastructure and services and facilities to support growth?**

In ‘Infrastructure, services and facilities to support growth’, there are a number of important bullet points in the ‘What you told us’ section.

1st point – planning permission should only be granted once current infrastructure constraints have been addressed and improved. Any additional infrastructure needed as a result of new planning proposals should be in provided and in place first.

2nd point – Agree that developers of Strategic Sites should pay for the appropriate infrastructure and community facilities – and the payment should be made up front at the point planning permission is given. This would ensure that infrastructure is actually provided and on a timely basis.

3rd point – Developers of housing should also contribute to appropriate infrastructure and community facilities in advance of starting building work. Infrastructure provision should be in correlation with the growth of residents in any one area.

Stoney Stanton has more than fulfilled the housing requirement in the Local Plan up to 2029, and the high level of housing added to the village has not been met with the required investment in improving local services and amenities which are now overstretched to serve the increased local population.

### **Q31: Are there any specific infrastructure issues that the Local Plan should address?**

The concerns are laid out in detail in the responses to the HNRFI and first issues and options, which are attached.

Transport infrastructure – review the current tail backs on the M69 motorway traffic at rush hour Leicester bound and then factor in the huge increase in haulier traffic that would come out of the HNRFI.

Robust traffic level assessments should be carried out to assess the inevitable queuing of traffic across the villages of Stoney Stanton, Sapcote and Burbage.

If the M69 southbound junction 2 is opened up to assist in serving the HNRFI, and the SDA, the significant increase in the amount of additional traffic that would use the junction would cancel out any possible benefits and suspect the situation will worsen. This would exacerbate the traffic issues in and around Stoney Stanton and Sapcote

**Q32: Are there any specific issues that the Local Plan should address in relation to planning obligations and developer contributions?**

Section 1.06 monies must be apportioned to any communities that will be impacted from the developments and where these are in close proximity to existing settlements and assessment must be made as to the ability of the services and facilities that have not expanded with previous growth.

**Summary**

It is evident the BDC potentially have a very large amount of growth that is going to be needed to be accommodated in this new Local Plan, mostly based on the unmet housing need from Leicester City Council.

Significant growth should be infrastructure led, and this provides an opportunity to enhance the existing road network at the same time. For this reason, is it considered that the A46 Expressway route to be defined is considered to have the biggest positive impact in terms of addressing existing transport issues as well as having the potential to provide for additional growth around this transport corridor via the creation of a new settlement (Whetstone Pastures).

The A46 Expressway route and Road Improvement Route 3 are able to provide a significant amount of growth around the improved road network, meaning that rural areas and villages do not suffer from as much negative impacts due to medium sized local growth. Whetstone Pastures (as an example) is also close to Leicester City Centre, where the additional housing need is required.

It is considered that the level of growth can and should be planned carefully, to avoid a significant impact on the character and rural environments of Blaby's villages and countryside.

It is noted that there are currently large gaps in evidence base, primarily due to a lack of clarity over the specific unmet housing need. This should be addressed as soon as possible before further modelling or reports are carried out to effectively inform the growth options for the new Local Plan.