

11 Leicestershire County Council	
ENV12	Response
The LLFA supports the overall intent of Policy ENV12 and the wider approach taken within the Plan to promote sustainable drainage, climate resilience and the management of local flood risk. In particular, the recognition that surface water flooding represents the primary source of flood risk within the Parish is welcomed, as is the support for sustainable drainage systems (SuDS), green infrastructure and multi-functional environmental benefits.	Noted. This supportive comment, in particular its recognition that Policy ENV 12 adds local detail to national and (in particular) local plans, gives us confidence that it should be retained in the referendum version of the Neighbourhood Plan
However, as previously advised, the LLFA recommends the inclusion of a reference to the national standards for sustainable drainage systems (SuDS): (https://www.gov.uk/government/publications/national-standards-for-sustainable-drainage-systems/national-standards-for-sustainable-drainage-systems-suds).	We are content for the Examiner to recommend this change if he sees fit to do so.
The policy requirement for applicants to demonstrate that “no alternative site is available” in areas susceptible to flooding is not consistent with the application of the Sequential Test, which is the responsibility of the Local Planning Authority. This wording should be removed or amended accordingly to avoid confusion and ensure alignment with national planning processes.	This wording is the same as that in equivalent policies in other Made Neighbourhood Plans in Harborough District. It was included in this form, despite being expressed differently from wording of the Sequential Test, because it seemed to us to be an appropriate short way of expressing the rationale (and objective) of the S.T. that, while glossing over the S.T.’s hierarchy was not in conflict with it.
The LLFA also recommends that references to a “hydrological study” are replaced with standard planning terminology, such as a proportionate Flood Risk Assessment and/or Surface Water Drainage Strategy, to ensure clarity and consistency with national guidance.	We are content for the Examiner to recommend this change if he sees fit to do so.
Subject to the amendments outlined above, the LLFA is broadly supportive of the Neighbourhood Plan and its approach to managing flood risk and promoting sustainable development.	Noted.
ENV10	
Notwithstanding the above, the MWPA notes that policy ENV10: Nature Recovery and Biodiversity Net Gain explicitly excludes a section of the proposed rewilding Plot 2 (as illustrated on Figure 16). The policy text provides further amplification and detail on the reason for this exclusion, stating: ‘The area indicated in Plot 2 is excluded from the allocation as a potential area for infrastructure. Identified infrastructure requirements for waste management facilities will be supported in the excluded area of plot 2’.	HDC suggested that GBPC used this wording If the examiner upholds LCC’s concerns then GPC will accept his proposed re-wording.
It is considered that this part of the policy effectively acts as an allocation for future waste management use. Section 38B (1)b) of the Planning and Compulsory Purchase Act 2004, states that a neighbourhood development plan may not include provision about development that is excluded development as defined by section 61K of the Town and Country Planning Act 1990 (the ‘1990 Act’), as amended. Section 61K of the 1990 Act includes, at sections 61K(a) and (b), development that consists of a county matter e.g. minerals and waste development. In light of the above, the MWPA requests that this section of the policy is deleted.	
Policy G2	
Climate Resilience Team Comments	
In relation to building design (Policy G2 Design Standards. Design codes E1 – Passive design measures and orientation and E2 – Integrating renewable energy in new developments):	We are content for the Examiner to recommend this change if he sees fit to do so. However, Design Code E1, which was produced by AECOM in 2023 and upon which Policy G2 was partly based, did not cover these topics and cannot now be
At present, the plan contains little detail on how designers and developers should prioritise and address adaptation of the built environment to increasingly severe and frequent weather events. Internal overheating of	

<p>homes is a growing issue, particularly in new builds with high levels of insulation, the plan should therefore stipulate the importance that high energy efficiency is not to be achieved at the expense of summer overheating. While the former is essential for reducing running costs in colder weather and should equally be emphasised in policy G2 and Design codes E1 and E2, the plan should stipulate overheating mitigation such as external blinds or shutters on south facing glazing, enhanced natural ventilation to allow greater heat dissipation and house types/designs that maximise cross ventilation.</p>	<p>changed. We also considered that the stipulations recommended by LCC (while admirable) were probably not enforceable as planning conditions, as they are (at least in part) covered by building regulations etc., but not by the national framework</p>
<p>Homes that can retain a comfortable internal temperature in both winter and summer are key to occupant health, reducing fuel poverty and builds resilience in the face of more severe weather. The plan, and specifically policy G2 and Design codes E1 and E2, should be enhanced to ensure that this is a requirement that is impressed upon developers.</p>	
<p>In relation to green infrastructure (Policy Env 2: Local Green Spaces, Policy Env 12: Flood Risk Resilience and Design Codes D1 – Extending and maintaining the green infrastructure network, D2 – Public Space Design and D3 – Water sensitive urban design):</p>	<p>We are content for the Examiner to recommend this change if he sees fit to do so.</p>
<p>It would be beneficial for the plan to modify existing policies or add to them to ensure the importance of green infrastructure in new developments is not missed. Street trees, SuDS such as verge rain gardens and bioswales, planted front gardens and parks are examples of green infrastructure which can not only promote better surface water infiltration at times of heavy rainfall but also mitigate high temperatures and the heat island effect by providing shading. Consider adding to policy Env 2 that high quality green infrastructure should be designed in at a master planning stage. Additionally, it is recommended that aftercare provision for the planting carried out be stipulated to ensure survival during its establishment.</p>	
<p>In relation to master planning (Policy Env 12: Flood Risk Resilience and Design Codes D3 – Water sensitive urban design):</p>	
<p>Flooding is a topic of high concern within Leicestershire. Policy Env 12 would benefit from being strengthened to reflect this. The plan should seek assurances from developers that surface water run off rates from the site are suitable and sustainable in the face of rapidly intensifying rainfall and flooding events. Developers should provide certainty that their proposals will not lead to heightened flood risk within the site itself, locally or further downstream in the catchment. Moreover, new developments, including their infrastructure, should be capable of retaining functionality in the event of exceptional but increasingly common rainfall events including those exceeding 20mm in an hour and over 200mm in 24 hours.</p>	<p>We agree, and are content for the Examiner to recommend this change if he sees fit to do so.</p>
<p>In relation to social resilience (Policy CAF2: Provision of new or the extension of existing community amenities and facilities and Design code D2 – Public space design):</p>	
<p>LCC would like to see more emphasis on the importance of building social resilience in the face of growing trends for extreme weather. Placemaking is a vital tool to engender greater social resilience, therefore it is recommended that policy CAF2 suggest inclusion of assets that can facilitate improved social cohesion such as multi-use buildings or ensuring good connections to existing such facilities. High quality outdoor green spaces can also perform a similar function. Not only do these communal facilities provide space for improved social cohesion, but they can also accommodate essential services during extreme weather such as heat waves and flood events. LCC would like to see the NP place more emphasis on compact and mixed used developments. This is, firstly, to increase the social cohesion of communities living in new developments and, secondly, to make reaching amenities easier in times of extreme weather such as heat waves and flood events. Compact and mixed-use developments also improve accessibility by active travel modes which improves resilience.</p>	<p>We agree, but were not confident that a Neighbourhood Plan policy could be worded in such a way to require developers to demonstrate good intentions of this sort in their proposals; we felt that a <u>policy</u> requiring measures to increase social cohesion and (only loosely-specified) climate resilience measures would, by so doing, probably exceed the provisions in the national framework.</p>
<p>General Comments</p>	
<p>With regard to the environment and in line with Government advice, Leicestershire County Council (LCC) would like to see Neighbourhood Plans cover all aspects of archaeology and the historic and natural environment including heritage assets, archaeological sites, listed and unlisted historic buildings, historic landscapes, climate impacts, the landscape, biodiversity,</p>	<p>We've done this!</p>

ecosystems, green infrastructure as well as soils, brownfield sites and agricultural land.	
Climate Change	
Policy EMP3 wording includes reference to superfast broadband, these should be replaced to reflect technological advances and now reference ultrafast, gigabit capable full-fibre broadband. Please see the general section below which highlights that in 2022 Ministers amended the Building Regulations 2010 to ensure that new homes constructed in England will be fitted with infrastructure and connections capable of delivering gigabit broadband - the fastest internet speeds on the market.	We are content for the Examiner to recommend this change if he sees fit to do so.