

Response to Blackfordby SEA Report Recommendations.

(Red is AECOM response Blue is agreed outcome)

Recommendation	Response
<ul style="list-style-type: none"> It is considered that the NDP could be positively improved through either including a new policy, or by revising Policy G2 (Design) to better support energy efficiency and reduction in carbon dioxide emissions in new development. This could include specific requirements to supporting design features that improve energy efficiency and reduces carbon dioxide emissions. This is of particular relevance given the climate emergency declared by North West Leicestershire District Council in 2019. 	<p>Policy G2 d) already says development should ‘ incorporate sustainable design and construction techniques to meet high standards for energy and water efficiency, including the use of renewable and low carbon energy technology such as solar panels and rainwater harvesters’.</p> <p>Is this not sufficient?</p> <p>This policy does not add much above the existing baseline established through existing local plan and national planning policy and supporting design documents. Therefore, it is recommended that you delve further into this issue and provide additional detail which is required to secure positive effects. However, the ER does note that the plan is considered to have a minor positive effect for climatic factors.</p> <p>The NP is considered to be sufficient in having a positive impact for climatic factors. No change.</p>
<ul style="list-style-type: none"> It is also considered that the NDP could be positively improved through either including a new policy, or by revising Policy G2 (Design) to require development proposals where possible to enhance the historic features and significance of non- designated heritage assets and their settings. The policy could further be strengthened by requiring development proposals to demonstrate how proposals would result in a net enhancement to the historic significance of heritage assets and their setting. 	<p>There is a policy (Env 4) on local heritage assets. Is this a better location for the reference to enhancing NDHAs?</p> <p>Incorporating the recommendation in Policy ENV4 does sound reasonable.</p> <p>We try not be too prescriptive on how recommendations should be incorporated in the NP.</p> <p>Change incorporated into Env 4</p>
<ul style="list-style-type: none"> Policy H1 (Residential Site Allocation) can be improved by requiring development proposals to protect, buffer and where possible enhance 	<p>This will be incorporated into the Policy.</p> <p>Change made</p>

<p>existing boundary hedges, trees and habitats and maintain undisturbed ecological connectivity. It is also recommended that the policy requires development proposals for the housing allocation to be supported by an ecological survey including a survey of protected species and to demonstrate how development would not cause harm or the loss of ecologically significant habitats, constrain ecological connectivity or displace without adequate mitigation any species present on site. The policy should also seek to encourage environmental net gain in accordance with the aspirations of the NPPF.</p>	
<ul style="list-style-type: none"> • Policy H1 can further be improved by affording protection to important existing landscape features and setting out a presumption against their harm. This includes safeguarding and where possible enhancing the natural corridor along Shell Brook and natural boundary screening along the southern boundary and undeveloped parts of the boundary along Drift Side. It is also recommended that planning proposals are required to be accompanied by a Landscape and Visual Impact Assessment (LVIA) that demonstrates that the proposed scheme would not cause substantial harm to landscape character and the identified important view and that any adverse effects on landscape have been adequately mitigated. The LVIA should further demonstrate how any associated planting accords with landscape character, uses native species and where possible results in a net landscape gain. 	<p>This will be incorporated into the Policy.</p> <p>Change made</p>
<ul style="list-style-type: none"> • Policy H2 (Housing Mix) could be strengthened by allowing development proposals the option to deviate from the requirement set when supported with a housing needs assessment that demonstrates a local unmet need for the proposed housing mix. This should ensure the policy is flexible to changes in housing need in the long term. 	<p>The Policy currently says that alternative mixes can be provided if the latest evidence indicates that this is appropriate.</p> <p>Isn't this already covered?</p> <p>The point we are trying to make here is that the policy could be improved by stating that development proposals can deviate from the requirements set in the latest evidence underpinning the plan when a local unmet need can be demonstrated through an assessment on housing need.</p>

	<p>I have amended the wording of the recommendation to improve clarification.</p> <p>The policy already allows for deviation from the NP evidence base. No change.</p>
<ul style="list-style-type: none"> Policy H2 (Housing Mix) could further be strengthened by setting out the proportion of housing types and sizes to ensure new housing reflects local need and contributes towards the widening of choice. 	<p>We think that specifying precise housing types and sizes would be too prescriptive It is up to the applicant to demonstrate the precise mix based on the evidence at the time.</p> <p>No change</p>
<ul style="list-style-type: none"> Policy ENV2 (Protection of Sites of Environmental Significance) could be strengthened by setting out a presumption against development on the identified sites of high significance for their environmental features and to require any development proposals to demonstrate and achieve environmental net gain, guided by the principles set out in the NPPF (2019). 	<p>We will add in a reference to the need to achieve a net gain in biodiversity.</p> <p>The Policy already requires development proposals to demonstrate that the benefit of development outweighs the harm by requiring a balancing judgement to be applied.</p> <p>Change made</p>
<ul style="list-style-type: none"> Policy ENV4 (Non-designated Key Buildings) should seek to afford greater protection to the identified features of local architectural and heritage interest by setting out a presumption against the loss or harm to the heritage asset unless if it can be demonstrated that the public benefit of the development proposal significantly outweighs the harm caused. The policy should further require development proposals to achieve enhancements to the significance of these heritage assets including their setting. 	<p>We will strengthen the policy as recommended.</p> <p>Change made</p>
<ul style="list-style-type: none"> Policies ENV8 and BE5 could be strengthened by requiring development proposals to be supported with a Landscape and Visual Impact Assessment (LVIA) to provide an assessment of the landscape significance of the site and the likely impact of development. Policy ENV8 could further be improved by requiring a comprehensive restoration of land following use including a net improvement in the landscape quality of the site where feasible and appropriate. 	<p>We will add in these recommendations.</p> <p>Change made</p>