

Glenfield Neighbourhood Plan Consultation Responses

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C001: Historic England:

The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.

If you have not already done so, we would recommend that you speak to the planning and conservation team at your local planning authority together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk <http://www.heritagegateway.org.uk>). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.

Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:-

<https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/>

You may also find the advice in “*Planning for the Environment at the Neighbourhood Level*” useful. This has been produced by Historic England, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information. This can be downloaded from:

http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf

If you envisage including new housing allocations in your plan, we refer you to our published advice available on our website, “Housing Allocations in Local Plans” as this relates equally to neighbourhood planning. This can be found at <https://content.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans.pdf>

C002: Coal Authority

The Coal Authority is only a statutory consultee for coalfield Local Authorities. As Blaby District Council lies outside the coalfield, there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans.

This email can be used as evidence for the legal and procedural consultation requirements at examination, if necessary.

R001:

I would like to register some initial comments for this years neighbourhood plan consultation. My comments refer to the Glenfield plan and the land at the rear of County Hall, I believe this is designated OS32 in the plan.

It is recorded as being an area of 'ridge and furrow' in 1999 but not in this plan. I think the area should still be designated as an area of ridge and furrow as the historical farming technique is still clearly visible right up the field towards the rear of Glenfield Hospital. It would be a big loss to the history of Glenfield and to the preservation of historical sites across the area.

I am also concerned about the impact that any development on this land would have on the local biodiversity. The wildlife record doesn't mention Bats or Badgers, which are often seen during the summer months. We also regularly see grey crested newts on our garden, we believe these should also be included on the biodiversity section for this site.

Finally, the site is not referenced as a flood risk, but due to the surface water run off from higher up the field our garage and garden have been flooded. Our developer had to install special drainage to divert some of the run-off. Our concern about a development on this area would be the impact this would have on displacing surface water and the risk this would have to our property.

C003: NHS Leicester, Leicestershire, and Rutland ICB

The NHS Leicester, Leicestershire & Rutland Integrated Care Board (ICB) are supportive of the vision set out in your draft plan and would want to work collectively with you to understand in more detail how the local NHS can contribute to its delivery.

Many of the themes identified in the plan will impact upon the wider determinants of health and as a result population health outcomes. We would therefore welcome working together to maximise the opportunity for health and wellbeing within the vision outlined in your plan.

In particular we would welcome:

- Actions to support the development of community identity; maximising opportunities for residents to come together to create community cohesion and support each other.
- Maximise the opportunities and provision of green space and local recreational facilities that actively promote enable residents to access and undertake physical activity with ease.
- That any new developments are designed in such a way to encourage and enhance physical and mental health and wellbeing.
- A range of options for travel (including active travel) within the plan that enables residents to get to and from work, leisure facilities and health services easily.
- Infrastructure for Active Travel should be actively encouraged with provision for high quality cycling and walking routes, good connectivity to surrounding settlements and ease of access to public transport.

- Designs that support the reduction in carbon emissions and air pollution, as this has a direct impact on some resident's health.

As well as the above generic comments it is important to note we are supportive of additional monitoring of nitrous oxide levels due to the impact on air quality of the nearby M1, A46 and A50 and any interventions to reduce the level of traffic pollution in this area.

We agree that it is not beneficial to further increase the volume of food outlets within Glenfield as well as the number of premises licensed to sell alcohol.

We also fully support your stance on enhancing the range of community facilities and amenities within Glenfield. Not only is this important for the good health and the long-term sustainability of the community, but Primary Care services are increasingly under pressure due to the growing number of additional roles now required to provide care closer to home for residents. Space and facilities are stretched and therefore we would welcome a discussion around potential health use of some of these protected facilities.

It is also important to note that any increase in the number of new residents in any area due to housing development will have a direct impact upon local NHS services whether that is primary, hospital or community care. Local primary care services are already under high demand and therefore any additional demand from housing developments will require developer contribution to mitigate this.

Finally, we are pleased to see that the impact of an ageing population has been noted and the impact on future healthcare provision considered in terms of ensuring services expand or relocate appropriately to continue to service the community. Thank you for the opportunity to comment on your vision and I look forward to working together to make the most of the opportunity and mitigate any impacts from increases in population upon local NHS services.

C004: Sports England

Government planning policy, within the **National Planning Policy**

Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities.

Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.

It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 98 and 99. It is also important to be aware of Sport England's statutory consultee role in **protecting playing fields** and the presumption against the loss of playing field land. Sport England's playing fields policy is set out in our Playing Fields Policy and Guidance document.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy

Sport England provides guidance on **developing planning policy** for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.

https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications

Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from

any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.

In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how **any new development**, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.

Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.

NPPF Section 8: <https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities>

PPG Health and wellbeing section: <https://www.gov.uk/guidance/health-and-wellbeing>

Sport England's Active Design Guidance: <https://www.sportengland.org/activedesign>

(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)

R002:

As residents of Glenfield, we support the Glenfield Neighbourhood plan in respect of the identified green wedges/local green spaces and maintaining them as such, without any further development. In particular, the area identified as SO08, land formerly part of the Western Park Golf Course.

Whilst SO08 falls within Blaby District Council boundaries, it is unclear (as a resident), who actually "owns" this land and whether it would be swallowed up in the development of this "strategic site" identified by Leicester City Council.

We strongly object to any development of any of the land (green wedge/local green space) which was formerly Western Park Golf Course - our reasons are set out below - which have been submitted to Leicester City Council as part of the current 2023 consultation process. This includes the area that falls within Blaby District Council boundaries and the Glenfield Neighbourhood Plan.

Objections to development of land formerly Western Park Golf Course

I object in the strongest terms against the proposed development of the land known as the former Western Park Golf Course - title deeds references LT397869 and LT25863 (the latter is subject to restrictive covenants, which are unavailable to view. These may possibly include development restrictions).

My primary objection is that this proposed development is contrary to Leicester City Councils Climate Emergency Strategy September 2020, which includes the strategy to “Enhance and protect biodiversity, green spaces and trees from climate change impacts”. This is an area previously identified by Leicester City Council as “green wedge” and “green lung”.

The proposed development is also contrary to the Government’s Environmental Improvement Plan announced on 31st January 2023.

At a time of climate crisis, this development would lead to the extensive destruction and loss of green space, areas of woodland (including mature and ancient trees for which tree preservation orders have been rejected), hedgerows, ponds, flora, fauna and extensive wildlife, including Common Buzzards, Woodpeckers etc.

This is not supporting biodiversity or minimising the climate crisis principles, quite the opposite in fact. I cannot see how any development plans would mitigate such loss of a vital green space nor the impact on the surrounding communities and residents, which have a duty to be protected by a such proposed development.

There are currently tree planting activities being undertaken or planned across the city and wider county, including Knighton Park and Bradgate Park, to help minimise the climate crisis.

In an article published 13/2/23 about the scheme in Knighton Park on the Leicester Government site, Deputy city mayor for transport, clean air and the climate emergency, Cllr Adam Clarke, said:

“These are just some of the ways in which we’re committing the principles of our plans to support biodiversity and minimise the impacts of the climate emergency”.

Developing the land at Western Park Golf Course does not adhere to these principles, as it would lead to the destruction of land, well established trees, woodland and self seeded saplings etc, which are vital to Leicester City Council’s Leicester’s Climate Emergency Strategy: April 2020 to March 2023.

The section “Land use, green space and development” (page 43) includes the following, which supports the argument for this land not to be developed as planned:

“Aside from the impact of development, land itself plays a number of very important roles, both in limiting carbon emissions and helping to adapt to the changing climate. Firstly, it stores carbon, preventing it from adding to carbon dioxide in the atmosphere.

...The study confirmed that large, mature trees are by far the most important.

In addition to storing carbon, trees and green spaces, as well as water bodies, play an important role in reducing the risks from the changing climate. They can help to slow down rainwater run-off after intense rainstorms, reducing the risk of flooding. They can also help to reduce the ‘urban heat island effect’, potentially reducing peak temperatures during heatwaves and providing shade,

... the extent of Leicester’s network of green spaces and water bodies, and its tree cover, is undoubtedly a very important asset in protecting the city from climate change”.

In addition, this green space is vital for the health and well being of the local community, those within the City boundaries and those within Blaby District Council. I personally walk to and around the former golf course on a daily basis. This has become an essential part of improving and maintaining both my physical and mental health/wellbeing, in addition to developing and supporting social contacts. The loss of this green space and all its benefits, would have a severe impact upon my health and well being, including that of my family.

The most appropriate use of this land would be for it to be “re-wilded” to support carbon capture and biodiversity. The land and biodiversity would also be saved for current and future generations. Such rewilding schemes are already in place with the Woodland Trust, a recent example being Frodsham golf course site, on the outskirts of Frodsham, Cheshire.

I therefore request that the development of Western Golf Course to be rejected on the basis of my objections above, particularly when alternative brown field sites have been identified for development.

R003:

Just to say I think the proposed developments to Glenfield should be scaled back. The village has grown dramatically in recent times and continued developments in housing will only further increase traffic and reduce air quality even further and continue the subsuming of the village into the city.

C005:National Highways

National Highways welcomes the opportunity to provide our comments on the Regulation 16 consultation for Glenfield Neighbourhood Plan (NP) which covers the plan period from 2022 to 2029.

National Highways has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to this consultation, our principal interest is safeguarding the operation of the M1 and A46 in the area.

We understand that a Neighbourhood Plan is required to be in conformity with the relevant national and local policies. We note that this is acknowledged within the document and that it has been prepared in accordance with Blaby District Local Plan (Core Strategy) 2013 and Blaby District Local Plan (Delivery) DPD 2019. This NP has acknowledged that the Blaby District Council is reviewing the Local Plan.

Glenfield is classified as a part of the ‘Principal Urban Areas’ (PUA) among with five other settlements in Blaby District in the current Local Plan. The Blaby District Local Plan (Core Strategy) 2013 requires the PUA to accommodate a minimum of 5,750 dwellings between 2006 and 2029 (Policies CS1 and CS5). However, there is no specific housing target for Glenfield or the other 5 settlements individually. Meanwhile, Blaby District Local Plan (Delivery) DPD 2019 allocates land to accommodate a minimum of 37 homes within Glenfield up to 2029.

Given the preparation of the new Local Plan is yet to be sufficiently advanced to confirm the housing requirement for Glenfield, we note that the District Council, through the standard methodology, anticipates around 339 new dwellings will be required in Glenfield over the timescales for the new Local Plan.

We note that the NP does not include any schemes to the SRN.

Considering the limited level of growth proposed across the NP area, we do not anticipate significant impacts of the proposals on our SRN's operation.

In line with the above, we have no further comments to provide and trust that the above is useful in the progression of the Glenfield Neighbourhood Plan.

R004:

Overall I fully approve of this great plan, which I believe will be strongly supported throughout the community. It is great to see the detailed work that has been conducted, led by Cllr. Denney, being shared with the public. I have full confidence that this will be voted on positively at the Blaby District Council, and hope to see this plan really enable a strong and positive future for the community of Glenfield and surrounding villages.

I have detailed a few key areas where I would like to make specific comment:

- It is really good to see a large amount of the neighbourhood plan focused on the local environment, bio-diversity, climate change and overall health and wellbeing of the area for current and future residents. It shows a great consideration that we must always balance decisions with the need for green spaces, and to see them as an integral part of the village, which should be protected at all costs.
- Completely agree with the reference to the non-support of any development on the 'Blackthorn Green and Fishley Belt (OS08)' area, in particular as this is a significant natural resource, which should be protected at all costs. Particularly given that without this green space, Glenfield would risk becoming an overly urbanised village, not to mention the impact on bio-diversity in the village. I appreciate the reference that planning would only be supported in specific scenarios, however I would say that this should be avoided at all costs, and Blaby District Council should always be mindful of the immense negative impact and development would have on the community and natural environment of the village.
- I'm totally aligned with the flood protection commentary, and believe this has not historically been fully considered or managed, particularly in the more recent developments. We must ensure the current flood issues are considered in any future developments and, need to ensure the environment agency input is fully implemented in future developments. As a community, I would argue we have been let down in the installation of appropriate flood mitigation solutions.

- I fully agree with the energy efficiency and electric vehicle proposals and believe Glenfield should be at the forefront of advocating future ready developments of the appropriate infrastructure.
- I would suggest that some reference to community parking protection should be made in the existing community facilities section. As these are a valuable asset in ensuring the long-term protection of the community facilities and businesses and should be protected by the parish, district and county councils, as much as possible. The loss of community parking could have significant long term unintended consequences.

I look forward to this coming to full council and fully support the approval of the plan.

C006: Severn Trent:

Position Statement

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments on the impacts of future developments and to provide advice regarding policy wording on other relevant areas such as water efficiency, Sustainable Drainage Systems (SuDS), biodiversity, and blue green infrastructure. Where more detail is provided on site allocations, we will provide specific comments on the suitability of the site with respect to the water and sewerage network. In the instances where there may be a concern over the capacity of the network, we may look to undertake modelling to better understand the potential risk. For most developments there is unlikely to be an issue connecting. However, where an issue is identified, we will look to discuss in further detail with the Local Planning Authority. Where there is sufficient confidence that a development will go ahead, we will look to complete any necessary improvements to provide additional capacity.

Specific Comments

Policy H5: Design Principles

Severn Trent are supportive of the approach to highlight water efficiency and within the design principles policy, however we would recommend that further detail of what is expected under the description of high standards for water efficiency. Severn Trent would recommend that the Optional Target Set out in part G of Building Regulations is utilised as the definition of high standard. This approach would align with our long term plans set out in Severn Trent's Water Resource Management Plan (WRMP) and the Humber River Basin Catchment Management Plan. Some example wording for detailing the water efficiency standard is provided below:

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

Additional information regarding water efficiency is also provided in our general guidelines below. Severn Trent would also recommend that Policy H5 highlights the need for development to incorporate high quality SuDS, that provide both surface water management and water quality, amenity and biodiversity improvements as identified in current industry best practice the SuDS Manual (CIRIA C753). The appropriate management of surface water is essential for creating sustainable development. Some example wording is provided below:

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

All schemes with the inclusion of SuDS should demonstrate they have considered all four areas of good SuDS design: quantity, quality, amenity and biodiversity. Completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure the SuDS are managed in perpetuity.

Alongside the use of SuDS, new development needs to follow the principles of the Drainage hierarchy so that surface water is discharged to the most sustainable outfall and that surface water connections to foul and combined sewers are avoided. Some example wording is provided below:

New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.

New Development has the potential to interrupt both manmade and natural drainage systems that perform a vital function in preventing flooding and conveying water safely through the landscape, the damage of; or removal of part of this network could result in increased flood risk on the development site or impact on the effectual drainage of other land.

In the cases of ditches or watercourses the removal or culverting of these features can also impact on biodiversity by reducing the access to water for wildlife and result in loss of habitats.

Severn Trent therefore recommend that the drainage systems of a site are understood before any site layout is constructed such that they can be incorporated into the layout of the development in the most effective and natural way, some example wording is provide below to assist with implementation of the recommendation.

No development shall prevent the continuation of existing natural or manmade drainage features, where watercourses or dry ditches are present within a development site, these should be retained and where possible enhanced.

Access to drainage features for maintenance should be retained and ownership of land clearly defined as part of the overall site maintenance plan.

Prior to the alteration of any alignment an assessment will be required to ensure that all connections into the watercourse are retained and that exceedance flows are not then directed away from the watercourse channel towards properties.

Policy ENV 1: Local Green Spaces

Severn Trent understand the need for Local Green Space and the need for it to be protected, however Local Green Spaces can provide suitable locations for schemes such as flood alleviation to be delivered without adversely impacting on the primary function of the Local Green Space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the Local Green Space in the form of biodiversity or amenity improvements. We would therefore recommend that the following point is added to Policy ENV 1 to support the delivery of flood alleviation projects where required within green spaces.

Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.

Policy ENV 3: Important Open Spaces

Severn Trent understand the need for Open Spaces and the need for it to be protected, however Open Spaces can provide suitable locations for schemes such as flood alleviation to be delivered without adversely impacting on the primary function of the Open Space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the Open Space in the form of biodiversity or amenity improvements. We would therefore recommend that the following point is added to Policy ENV 3 to support the delivery of flood alleviation projects where required within green spaces.

Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.

Policy CC1: Flood Risk Resilience

Severn Trent are supportive of the general principles outlined within Policy CC1, but would recommend that statements regarding the SuDS design be enhanced to mirror our comments made regarding Policy H5, and that specific reference is also made to the Drainage hierarchy within Policy CC1.

Policy CC2: Energy Efficient Buildings

Severn Trent are supportive of the inclusion of bullet point d) within policy CC2 the process of providing potable water and then processing waste water so that it is safe to return to the environment has a significant energy demand, whilst we are working to minimise the carbon impacts of our operations included within our Triple Carbon Pledge. The use of water within the home appliances such as dishwasher, washing machines and showers etc, all have an energy cost, by using water efficient technology, less water needs to be heated reducing the energy demand. For your information we have set out some general guidelines and relevant policy wording that may be useful to you.

General Comments

Wastewater Strategy

We have a duty to provide capacity for new development in the sewerage network and at our Wastewater Treatment Works (WwTW) and to ensure that we protect the environment. On a company level we are producing a Drainage and Wastewater

Management Plan covering the next 25 years, which assesses the future pressures on our catchments including the impacts of climate change, new development growth and impermeable area creep. This plan will support future investment in our wastewater infrastructure and encourages collaborative working with other Risk Management Authorities to best manage current and future risks.

Where site allocations are available, we can provide a high-level assessment of the impact on the existing network. Where issues are identified, we will look to undertake hydraulic sewer modelling to better understand the risk and where there is sufficient confidence that a development will be built, we will look to undertake an improvement scheme to provide capacity.

Surface Water

Management of surface water is an important feature of new development as the increased coverage of impermeable area on a site can increase the rainwater flowing off the site. The introduction of these flows to the public sewerage system can increase the risk of flooding for existing residents. It is therefore vital that surface water flows are managed sustainably, avoiding connections into the foul or combined sewerage system and where possible directed back into the natural water systems. We recommend that the following policy wording is included in your plan to ensure that surface water discharges are connected in accordance with the drainage hierarchy:

Drainage Hierarchy Policy

New developments shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, whereby a discharge to the public sewerage system is avoided where possible.

Supporting Text:

Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states: “Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:

1. into the ground (infiltration);
2. to a surface water body;
3. to a surface water sewer, highway drain, or another drainage system;
4. to a combined sewer.”

Sustainable Drainage Systems (SuDS)

Sustainable Drainage Systems (SuDS) represent the most effective way of managing surface water flows whilst being adaptable to the impact of climate change and providing wider benefits around water quality, biodiversity, and amenity. We therefore recommend that the following policy wording is included within your plan regarding SuDS:

Sustainable Drainage Systems (SuDS) Policy

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

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

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

Supporting Text:

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

Blue Green Infrastructure

We are supportive of the principles of blue green infrastructure and plans that aim to improve biodiversity across our area. Looking after water means looking after nature and the environment too. As a water company we have launched a Great Big Nature Boost Campaign which aims to revive 12,000 acres of land, plant 1.3 million trees and restore 2,000km of rivers across our region by 2027. We also have ambitious plans to revive peat bogs and moorland, to plant wildflower meadows working with the RSPB, National Trust, Moors for the Future Partnership, the Rivers Trust, National Forest and regional Wildlife Trusts and conservation groups.

We want to encourage new development to continue this theme, enhancing biodiversity and ecology links through new development so there is appropriate space for water. To enable planning policy to support the principles of blue green Infrastructure, biodiversity and protecting local green open spaces we recommend the inclusion of the following policies:

Blue and Green Infrastructure Policy

Development should where possible create and enhance blue green corridors to protect watercourses and their associated habitats from harm.

Supporting Text:

The incorporation of Sustainable Drainage Systems (SuDS) into blue green corridors can help to improve biodiversity, assisting with the wider benefits of utilising SuDS. National Planning Policy Framework (2018) paragraph 170 States:

“Planning policies and Decisions should contribute to and enhance the natural and local environment by:

- a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan);
- b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;
- c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;
- d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”

Green Open Spaces Policy

Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.

Supporting Text:

We understand the need for protecting Green Spaces, however open spaces can provide suitable locations for schemes such as flood alleviation schemes to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space through biodiversity and amenity benefits.

Water Quality and Resources

Good quality watercourses and groundwater is vital for the provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that the water quality of our supplies are not impacted by our operations or those of others. Any new developments need to ensure that the Environment Agency's Source Protection Zones (SPZ) and Safeguarding Zone policies which have been adopted by Natural Resources Wales are adhered to. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan as prepared by the Environment Agency.

Every five years we produce a Water Resources Management Plan (WRMP) which focuses on how we plan to ensure there is sufficient supply of water to meet the needs of our customers whilst protecting our environment over the next 25 years. We use housing target data from Local Planning Authorities to plan according to the projected growth rates. New development results in the need for an increase in the amount of water that needs to be supplied across our region. We are committed to doing the right thing and finding new sustainable sources of water, along with removing unsustainable abstractions, reducing leakage from the network and encouraging the uptake of water meters to promote a change in water usage to reduce demand.

New developments have a role to play in protecting water resources, we encourage you to include the following policies:

Protection of Water Resources Policy

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

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 163 states:

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

Water Efficiency Policy

We are supportive of the use of water efficient design of new developments fittings and appliances and encourage the optional higher water efficiency target of 110 litres per person per day within part G of building regulations. Delivering against the optional higher target or better provides wider benefits to the water cycle and environment as a whole. This approach is not only the most sustainable but the most appropriate direction to deliver water efficiency. We would therefore recommend that the following wording is included for the optional higher water efficiency standard: *New developments should demonstrate that they are water efficient, incorporating water efficiency and re-use measures and that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, not exceeding 110 litres/person/day.*

Supporting Text:

National Planning Policy Framework (July 2018) Paragraph 149 states:

“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, coastal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”

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

We recommend that all new developments consider:

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

Water Supply

For the majority of new developments, we do not anticipate issues connecting new development, particularly within urban areas of our water supply network. When specific detail of planned development location and sizes are available a site-specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. If significant development in rural areas is planned, this is more likely to have an impact and require network reinforcements to accommodate greater demands.

Developer Enquiries

When there is more detail available on site-specific developments, we encourage developers to get in contact with Severn Trent at an early stage in planning to ensure that there is sufficient time for a development site to be assessed and if network reinforcements are required that there is time to develop an appropriate scheme to address the issues. We therefore encourage developers to contact us, details of how to submit a Developer Enquiry can be found here -

<https://www.stwater.co.uk/building-and-developing/new-site-developments/developer-enquiries/>

We hope that this information has been useful to you, and we look forward to hearing from you in the near future.

R005:

I am very concerned about yet more building in this already large village, but I am even more concerned about digging up an area of beautiful nature. We are being encouraged to plant trees to help the environment and Leicester City Council and Blaby District Council are actually considering basically destroying these mature trees. This will create more pollution which will affect the physical health of the people in the area. The old golf course is a wonderful space to walk in, to relax and unwind with friends, family and dogs or on your own. At this time of stressful living people really need this natural area to unwind and restore their equilibrium. I would ask the council to really think of the people of Glenfield that they represent and really consider their needs.

R006:

As a resident in Glenfield, I only discovered the Golf course during lockdown. What an amazing, beautiful peaceful area full of wildlife. It has now become a regular trip every weekend for my partner and I with the dog. My son often goes with his friends where they play 'man hunt' and do not have to worry about traffic, they love discovering different areas on the golf course and the freedom and safety they have there, as we did when we were younger. It is an absolute bonus for living in Glenfield! I can't believe that you are considering destroying this place of beauty. Climate change, mental health, need I go on? It is a 'no brainer' that this MUST stay. I cannot emphasise enough the need we have for this area to remain. My partner is French from the Vosges and was so unhappy living in Glenfield prior to discovering the golf course. The connection with nature is vitally important for him and the golf course has made him appreciate living in Glenfield so much as opposed to Clarendon Park where we previously lived. It is an amazing space which must be preserved PLEASE!

It is so beautiful in all seasons and to destroy it would be an appalling error.

Please leave the golf course. It could be promoted as an area to visit, build a café, improve the parking facilities, charge a fee as at Bradgate Park, it could make some money as long as it is preserved!!!

R007:

Dear Sir/Madam

I wish to object to the proposed development of the old Western Park Gold Course for the following reasons; The land is a valued local green space used by a large proportion of the community to help their health and well-being.

You must safeguard open spaces and retain green wedges between the communities of Glenfield and New Parks.

There is rich biodiversity on the land including bats, badgers , newts , buzzards etc.

Also significant historic interest with a Roman military road and encampment plus medieval ridge and furrow field systems.

The land has a reference OS08 on the Glenfield Parish maps.

Please do not destroy the valued local space.

R008:

I would like to raise my concerns over the proposed development on Western Park golf course.

After reading the Leicester Local plan 4.24 suggesting two council's work together in bringing the large area to be developed upon.

This biodiverse area, is to be totally ruined by over development, on an area of such recreational use for local people, who have been using this land since its closure for lots of benefits to mental health, physical fitness and wellbeing. The vast amount of wildlife and cleaner air provided by the 100's of mature trees on this site, would be a criminal act of clearance. When the city has numerous brownfield sites to develop.

The amount of rainfall which this land soaks up before flowing into Rothley Brook must be vital to help with flooding in the area. The main road outside DPD floods now after heavy rainfall so what would happen to the water table without this large natural sponge.

The roads around Glenfield are already extremely busy with the optimus point development which still has unused land for sale. We have had enough housing for Glenfield and I strongly oppose any more land to be developed on.

R009:

We wholeheartedly agree that all must be done to save our natural environments in and around Glenfield.

R010:

Don't take our green space away from us, through lockdown this has been the place where everyone walked. Lots of people walk there dogs on here daily including me if you take this away from us WHERE CAN I WALK MY DOG there is no other space that they can be off in glenfield. YOU CANT DO THIS and we will do everything we can to stop you.

R011:

I am emailing to raise my high concerns over the plans to build on the old western park golf course.

As a young resident of Glenfield, I feel it would be detrimental to loose this space, not only for the people who use it, but also for animals, whos welfare I view superior to more housing.

As someone who works for the Leicestershire RSPCA we see wildlife injured daily, being brought to us. This is due to the fact these animals are being pushed to leave their safe spaces and live amongst the busy roads. I couldn't count the amount of animals that could have been saved if they had a green area to live on.

I know so much wildlife lives on this greenspace, which I have seen with my own eyes, if we take this away it will only cause more accidents and the loss of our beautiful friends.

Our RSPCA centre is based on scudamore road, which is situated next to the old golf course. With this already being a busy road, it can cause our frightened dogs a lot of stress when we attempt to walk them.

The roads will only get busier with more housing.

Even if you are not an animal lover, I believe you should appreciate the loss this will cause for every animal involved. Hurt animals will always be the utmost priority at our centre and we would appreciate if you could consider helping us, not only for the animals but for the people who have to deal with the tragic ending for them.

R012:

I am very much against the removal/use and development of the Western Park Golf course.

This vital greenery, beautiful nature and promoting outside activity, should be preserved.

You may wish to make it more accessible for local residents, such as lower costs for Glenfield residents, to increase wider utilisation of it.

Please accept this as an objection to it.

R013:

We are writing in connection with the proposed development of the Western Park Golf Course.

The area in question is officially recognised as an area of Green Wedge. The importance of this area for the physical and mental well-being of the local population has become even more significant to people since the Covid restrictions, and the area has been heavily used ever since.

The roads in the area are already very busy, congested at times, and take traffic heading for the Western Distributor Road. A lot of this traffic is heavy goods vehicles from the various existing industrial estates.

The proposed development will inevitably increase road traffic, with the consequent increase in various pollutions – noise, dust, air quality.

Road access to the site is currently very poor. Access onto Scudamore Road (already very busy) will make the current situation worse. Plans for the development of Site 525 - Fulford Road – will add 58 new dwellings which will also feed on to Scudamore Road.

Any planned new access roads will create issues. An access road to the roundabout leading to Kirby Muxloe will generate more traffic, some of which will travel towards the A47, therefore having to negotiate a very awkward and dangerous railway over bridge.

The former Western Park Golf Course is officially listed as an area of high biodiversity. Development will cause enormous damage to this wildlife site. There are ponds with contain officially recorded Great Crested Newt populations. There will be a high risk of these ponds becoming contaminated during the construction phase. The site does contain ancient woodlands and trees, which could be damaged, or lost entirely if the development goes ahead.

The addition of a household waste recycling centre to the proposals was not part of the public consultations, and so no objections could be made at that stage. If this part of the development were to go ahead, it would bring even more vehicles into the area, and add even more sources of nuisance such as air pollution, flies and unpleasant odours.

R014:

GLENFIELD NEIGHBOURHOOD PLAN 2022-2029

My response relates to the Glenfield Neighbourhood Plan, Consultation Statement, and the Statement on Pre-Submission Comments and Responses.

STATEMENT ON PRE-SUBMISSION COMMENTS AND RESPONSES

It was understood that all comments received by Glenfield Parish Council at the formal pre-submission stage of the Glenfield Neighbourhood Plan (GNP) would be logged and responded to accordingly. (Consultation Statement, Page 24, para 3). I emailed pre-submission comments to the Parish Council on 9th December 2021 putting forward proposals where I believe more allotments and a new burial ground could be sited, together with reasons why the 12 hectares of agricultural land situated at the southern end of Glen Park Avenue should remain in the Rothley Brook Green Wedge, subject to Policy ENV5 in the pre-submission version of the GNP. Unfortunately, my comments appear not to have been logged by the Parish Council or responded to. Why they were overlooked is not known. I emailed the

Parish Council on 15th July 2022 pointing out the oversight, however, I have never received an explanation as to why they were not considered and responded to.

The publication and response of all comments received at the formal pre-submission stage is important as it gives parishioners the chance to see what issues have been raised and what course of action is being proposed on their behalf. The Parish Council, therefore, should not be able to decide which issues are logged and responded to. After all, as residents have frequently been informed, the GNP is not the Parish Council's Plan, but the Community's Plan. Preparation of the Plan, therefore, should be open and totally transparent. For this reason, I am submitting my comments again so they can be given due consideration.

MY PRE- SUBMISSION COMMENTS EMAILED TO GLENFIELD PARISH COUNCIL ON 9th DECEMBER 2021

The publication of the Glenfield Neighbourhood Plan for public comment is welcomed. The Plan is a well-presented document containing a wealth of information that has no doubt taken a great deal of time and effort to prepare. I fully endorse many of the policies and proposals put forward. However, as the Neighbourhood Plan Steering Group comprised local residents and parish councillors, this was an excellent opportunity for the Steering Group to confront some of the more fundamental infrastructure concerns raised by parishioners in the 2020 Glenfield Questionnaire.

It is noted, it is the vision of the Neighbourhood Plan that Glenfield will be a well-balanced community by 2029. It is a great pity therefore, that no positive proposals have been put forward for the provision of a village burial ground and additional allotments by 2029.

The removal of 12 hectares of agricultural land from the Rothley Brook Green Wedge Policy also seems rather baffling.

POLICY ENV 5: ROTHLEY BROOK GREEN WEDGE (Page 37-39)

The policy objectives put forward in Policy ENV 5: Rothley Brook Green Wedge, are supported. However, what is unclear, is why some 12 hectares of agricultural land situated at the southern end of Glen Park Avenue has been excluded from the Green Wedge as shown in Figure 10. Currently, the land is subject to Green Wedge Policy CS16 in the Blaby District Core Strategy.

It is noted on Page 38-39 that Blaby Core Strategy Policy CS16 is supported with a slight modification to take account of changes that may be required during the lifetime of the Neighbourhood Plan. However, it is contested that this modification is unnecessary at this point in time pending the publication of the Draft Blaby Local Plan next year.

The land, the subject of Blaby Core Strategy Policy CS16, is the last substantial tract of open countryside left in Glenfield Parish. It comprises good agricultural land that acts as a 'green lung' giving parishioners delightful panoramic views and access to open countryside. The land gradually rises from the Rothley Brook to a high horizon which is particularly prominent from within the built-up area of Glenfield. There are also excellent views from the land when looking back towards Glenfield and the tree-lined corridor that runs along the Rothley Brook.

Green Wedge policies running along the Rothley Brook corridor have now been put forward in the draft Leicester, Charnwood and Hinckley & Bosworth Local Plans using a shared methodology. Indeed, in the Consultation Draft Hinckley & Bosworth Local Plan, all of the land situated east of Sacheverell Way up to Glenfield Parish Boundary, is subject to the Rothley Brook Meadows Green Wedge Policy which is intended to help prevent the merging of the villages of Glenfield and Groby. It is hoped that a similar green wedge will be retained in the new Blaby Local Plan that will act as a green buffer of open countryside also helping to keep the two settlements from merging.

The 12-hectare site located at the southern end of Glen Park Avenue was originally put forward in the first version of the Neighbourhood Plan as reserved housing site H1(b) to provide 330 dwellings, and therefore, was not shown subject to Green Wedge Policy. However, now the reserved housing site is not being proceeded with, there is no logical reason why the land should not be reinstated in Policy ENV5.

It can only be assumed that the land has been left out in order to help facilitate approval for housing development at some later date by the removal of an additional planning constraint. However, it is questionable whether the 12-hectare site can be developed for housing in its present form. The only access to the land appears to be from the end of Glen Park Avenue. The provision of 330 new dwellings and 80 existing dwellings will total 410 dwellings, well over the maximum number of dwellings permitted off a single access, as set out in the Leicestershire Highway Design Guide. Glen Park Avenue is a long straight road of average width that encounters considerable on-street parking. Another 330 dwellings accessing from the end of the road will only exacerbate existing traffic problems in the area and therefore, will be in direct conflict with Policy T1(a) in the Neighbourhood Plan. It is puzzling therefore why the land has been left out of the Green Wedge.

The exclusion of the land from Green Wedge Policy ENV5 will remove an important planning constraint protecting it from development. It is proposed therefore that the land remains in the Rothley Brook Green Wedge. There is no reason to exclude it from Green Wedge Policy ENV5 at this point in time prior to the publication of the new Draft Blaby Local Plan next year. If it is necessary to make changes in the light of any new Blaby Local Plan proposals, these can be undertaken when the Neighbourhood Plan is formally reviewed in two years' time as proposed in Section 6.

CEMETERY (Page 63)

The provision of a village burial ground has long been a contentious issue over a considerable period of time, and it is not surprising that residents in the 2020 Glenfield Questionnaire felt that this problem needs addressing now. It is noted that a core of older residents born and bred in the parish wish to be buried in the village. This is not surprising as no doubt many of their family members are buried in the village churchyard. It is also acknowledged that some 62% of residents who want to be cremated, would like the Parish Council to acquire a graveyard for those who wish to be buried. In saying this, no doubt a significant number of these residents would also like to have their ashes interred within a village graveyard.

In spite of residents' wishes, it is disappointing that the only proposal put forward in the Neighbourhood Plan is one generally supporting the provision of additional burial capacity which does nothing in the short to medium term to help provide a village burial ground. It is considered that the publication of the Neighbourhood Plan is a missed opportunity to identify a suitable site.

In the 2020 public consultation, many residents supported the Glebe Allotments behind the churchyard as the ideal location for the village burial ground being adjacent to the church graveyard, a fact that was not lost on the Parish Council when it originally purchased the land for a burial ground in 1978, when it was known St Peter's Churchyard was nearing capacity.

The allotment site has a considerable number of advantages to be converted into the village burial ground:

- it is owned by the Parish Council and can easily be made available for burials and the internment of ashes in the short to medium term,
- it adjoins the existing church graveyard,
- is central to the village and easy for parishioners to access,
- has little environmental impact on adjoining properties,
- ideal for funeral services held at St Peter's Church,
- access can be taken through St Peter's Churchyard by means of a footpath link,
- an Environment Agency T1 Audit indicates at least two thirds of the site can be safely used for burials and the internment of ashes,
- the release of land for burials can be phased according to need, resulting in some of the allotments being retained over a longer period of time. Indeed, if another burial site is acquired at some time in the future, the whole of the allotment site might never be needed,
- the land will have public access and visually, become an extension to St Peter's Churchyard which is the subject of Policy ENV1 in the Neighbourhood Plan, designed to protect local green spaces. Currently, the allotment site is regarded as private open space, kept locked with only allotment holders allowed access.

Because of the long-standing difficulty in finding a burial ground in Glenfield, the Parish Council set up the Glenfield Burial Ground Working Party in July 2017 comprising parish councillors and local residents. The Working Party's remit was to find a suitable site that would be large enough to accommodate burials over the next 15 -20 years. A number of potential sites were examined, and it was subsequently agreed that the site with the greatest potential was the Glebe Allotments. The decision was taken to appoint consultants to undertake an Environment Agency T1 Audit to ascertain whether the allotment site would be environmentally safe to take burials. The consultants subsequently confirmed that at least two thirds of the allotment site is safe to use for burials and the internment of ashes.

Regrettably, since then, no positive action has been taken to move the matter forward. Spurious reasons keep being put forward why the allotment land cannot be considered, and planning permission sought, such as access, the relocation of the allotments, whether the land is suitable for burials etc. However, it is considered that all of the issues raised can be resolved if the pressing need for a village burial ground is taken seriously.

The provision of a village burial ground is long overdue. The Glebe Allotment Site is the obvious location, it ticks all the boxes. It is large enough to take burials and the internment of ashes well beyond the next 15 -20 years. The land should be put forward as a proposal in the Neighbourhood Plan.

Results from the Glenfield Questionnaire also revealed that some residents favoured a Garden of Remembrance. There is no reason why this type of memorial cannot also be provided. The Parish Council own several sites where this type of feature could easily be provided. It would not be expensive or difficult to provide.

A site could be put forward in the Neighbourhood Plan for residents who prefer this type of memorial, possibly within the proposed burial ground.

As acknowledged on page 63, all the parishes bordering Glenfield have their own traditional burial grounds that are for residents only. Glenfield, with a population of about 12,000, is the only exception that regrettably mainly relies on Leicester City Council to provide its burial services. This is unacceptable, Glenfield should not have to rely on another local authority to provide this essential community function. If the City Council were to change its policy to 'Leicester residents only', Glenfield parishioners would have no place locally to be buried or their ashes interred.

ALLOTMENTS

Currently, there is a shortfall of allotments in the parish which was a significant issue raised in the Glenfield Questionnaire. It is disappointing therefore that there is hardly any reference to allotments in the Neighbourhood Plan. It is considered that a suitable site could have been identified and placed in the plan as a proposal.

There is a strong argument to have the parish allotments sited at one strategic location. It is suggested therefore, that additional allotments be sited in the 1.2 ha field located to the north-east of the Mill Lane allotments, running alongside Kirby Road and up to the water filled ditch on the north-western side of the field. This part of the field appears not to flood and the principal of siting allotments off Kirby Road has already been established when planning approval was given to the Mill Lane allotment site.

Vehicular access to the land might be feasible from Kirby Road where there is a wide verge, good highway visibility in both directions and within the 30mph speed limit. An excellent alternative would be to access the land from the existing allotment site by way of a bridge over the adjacent watercourse. Access could then be taken off Mill Lane through the existing allotments, which would also have the additional benefit of utilising the existing car park on Mill Lane. The 1.2 ha field would not only replace the Glebe Allotments behind the churchyard, that are proposed as the new village burial ground(0.48ha), but also help overcome the current shortfall of allotments in the Parish as a whole.

The purchase of the field and subsequent development work (possibly the design and construction of a bridge over the watercourse) could be financed from Section 106 Contributions. Afterall, these financial contributions are provided by developers to help provide and enhance public open space facilities throughout the parish where the facility cannot be provided on their sites, this includes the purchase of land for allotments. Currently, £161,563 is available in Blaby District Council's Section 106 Account to help implement these types of projects in Glenfield.

The field to the north-east of the Mill Lane allotments would make an excellent location for additional parish allotments. Consideration should be given to including it as a proposal in the Neighbourhood Plan.

ADDITIONAL COMMENTS ON THE GLENFIELD NEIGHBOURHOOD PLAN

If Neighbourhood Plans are to have any true meaningful relevance to their communities, they should not only be helping to address development options, but also help retain and provide important facilities that parishioners feel are needed to establish a well-balanced community. To this end, several surveys have been undertaken throughout the parish since the Millennium, the latest being the 2020 Questionnaire that focused on specific concerns of parishioners, in order to make sure the draft plan addressed important community issues (Consultation Statement, page 8, last para). For a large number of Glenfield Parishioners, the urgent need for a village burial ground and more allotments have been contentious issues over many years. **It is a big disappointment therefore, that both these important issues have for the most part been overlooked in the Glenfield Neighbourhood Plan with no positive proposals put forward.**

Burial Ground

When Glenfield parishioners were consulted in the 2020 questionnaire, a considerable number of residents stated they wanted a village burial ground. Indeed, many residents went further to suggest that the Glebe Allotments adjoining the church graveyard was the obvious place for the burial ground to be sited. This was the view of the Parish Council back in 1978 when it was known St Peter's Churchyard was nearing capacity, and it took the decision to purchase the paddock adjoining St Peter's Churchyard for the village burial ground. It appears the reason why the Parish Council purchased the Glebe Allotments, was not appreciated by the Steering Group when consulting parishioners on other possible locations in the 2020 Questionnaire. (Consultation Statement page 18, para 7, last sentence)

In the 2020 Questionnaire Analysis, it is alleged that the Steering Group was aware a considerable number of residents supported the Glebe Allotments as the new burial ground. For this reason, the weird decision was taken not to include the allotments in the questionnaire as a potential site, (Consultation Statement, page 18, para 7), but instead, include several other bizarre locations which had already been considered by the Glenfield Burial Ground Working Party and rejected by parishioners when responding to the 2020 Questionnaire. However, in spite of the allotment's omission from the questionnaire, a considerable number of residents still took the opportunity to re-affirm their view that the Glebe Allotments was the best location for the village burial ground. It is puzzling therefore, why in the first place, the Glebe Allotments were never put forward in the questionnaire as a potential site, as no doubt, it would have gained even more support from parishioners had it been included; secondly, it is not understood why the provision of a burial ground and allotments are frequently discussed by the Parish Council in closed sessions.

Regrettably, the only policy put forward in the GNP is Policy CF6, a bland statement stating, 'the provision of additional burial capacity for the residents of Glenfield is supported'. It is considered that the Parish Council should be taking a leading role in providing a burial ground. Unfortunately, the negative policy does nothing in the short to medium term to provide one. The only way Policy CF6 is likely to be realised in the future is a developer dedicating land on the back of the Parish Council supporting large-scale development proposals in the Rothley Brook Green Wedge, particularly in the area surrounding 'The Brantings'. Is this what the Parish Council is really planning for?

Reasons why a considerable number of parishioners feel the Glebe Allotment Site is the obvious location for the village burial ground are set out more fully in my pre-submission comments on Page 2-4 above, which, as I have pointed out, have never been considered by the Steering Group or Parish Council as part of the GNP consultation process. The Glebe Allotments is the only site in the parish that has had an Environment Agency T1 Audit carried out that confirms most of the land is environmentally safe to take burials and the interment of ashes.

Allotments

Glenfield is short of the allotments it needs to meet the national policy standard for a parish with a 12,000 population. As the provision of allotments is a parish council matter, one would have expected that policies/proposals could have been put forward in the Neighbourhood Plan stating the current shortfall, together with putting forward positive proposals to provide more allotments to meet the national standard, preferably by 2029. Regrettably, there is hardly a mention of allotments in the Neighbourhood Plan. Once again, it would appear the strategy is that a developer will dedicate land on the basis that large-scale development proposals will be approved in the Rothley Brook Green Wedge. **I have put forward proposals in my pre-submission comments on page 4 & 5 above which have never been considered as part of the GNP consultation process.**

Policy ENV1: Local Green Spaces

It is proposed the Glebe Allotment Site is made subject to Policy ENV1. The Glebe Allotment Site is currently kept locked and regarded as private open space. Under my proposal, the Glebe Allotments will be converted into the village burial ground and become an extension to St Peter's Churchyard Local Green Space, thereby allowing greater public access in the centre of the village.

The future use of the Blackthorn Green and Fishley Belt Local Green Space is in question. It is suggested it could be purchased by Blaby District Council or Glenfield Parish Council and returned to its former use, possibly as a pitch & putt golf course. No doubt Leicester City Council will not want to finance its continued future maintenance and will be agreeable to its sale. It is noted in Paragraph 4.24 in the Draft Leicester Local Plan, that Blaby District Council and Leicester City Council plan to work together in bringing the land forward for development. Its development as a pitch & putt golf course could be considered.

Consultation Statement

Consultation Statements are important documents as they set out what procedures have been undertaken to prepare and publicise Neighbourhood Plans. They should also include the names of the people involved in the decision making and how they were taken. More information, therefore, should have been given on the personnel who sat on the GNP Steering Group, stating their names, how they were selected, and in particular, how responses were shared between them during the Covid Pandemic and decisions subsequently taken.

It would appear from the latest GNP email dated 26/1/23, that a Steering Committee has now been set up to move the Neighbourhood Plan forward to adoption. If this is the case, who are the Committee members, how were they selected, and did this group make the final decisions? Parishioners are entitled to know who were

scrutinizing their responses and making important decisions on their behalf. Other consultation statements have published this kind of information.

It is understood that over 700 parishioners expressed a desire to be kept involved in the publication of the GNP which would give the Steering Group a representative focus group that could be asked to comment on the plan as it develops. Of these, 417 were targeted and asked specific questions. It is asserted that the Focus Group was an important component of the consultation process. Unfortunately, at this important stage of the GNP process, nothing has been included in the Consultation Statement on what questions were asked or responses received.

Submission of Glenfield Neighbourhood Plan

It is considered that the submission of the Glenfield Neighbourhood Plan to Blaby District Council needn't have been rushed just to enable it to be submitted before the Draft Leicester City and Blaby District Local Plans are published. An important element of the consultation process is to give all parishioners and interested parties the opportunity to debate and ask questions on the GNP, particularly at the formal pre-submission stage. It is appreciated that over the last three years, it has been difficult to hold public meetings due to the covid pandemic. All the more reason therefore, to have delayed submission of the Neighbourhood Plan a few months which would have given more time for a public meeting/s to be arranged at this important stage of the neighbourhood plan process. A considerable number of Glenfield residents are elderly and don't have access to a computer to view the plan and supporting documents online. A public meeting/s would have given them the opportunity to ask questions on issues of concern to them.

The return of only 21 responses, excluding mine, of which only six appear to be from parishioners, is a very poor response from such a large parish as Glenfield with a population of 12,000 residents. This is no doubt, the result of it being rushed at the pre-submission stage just to try beat the publication of the Draft Leicester and Blaby District Local Plans and help constrain development. However, if the GNP had concentrated on other issues that are just as important to parishioners and arranged a public meeting/s for residents to be able to question the Steering Group's Spokesperson on the policies/proposals put forward, there would have been a much better response.

R015:

I am emailing you to put forward my opposition to the proposed plan for the future development of the Western Park Golf Course. My fear is that this area will be used predominately for more housing and worse still more warehouses and assorted industrial use. Why on Earth is there a supposition that people want to live within close proximity to these industrial estates. Is this the future? because if it is then the incidence of mental health issues and associated problems with large cities will continue to increase.

Could all or a proportion of this land not be sold to The Woodland Trust or similar organisation with a more humane approach to peoples future wellbeing.

If no change in the plan is forthcoming then in twenty years time what will this area be like for future generations. More pertinently what will be the future legacy of BDC be for the people it serves.

Please, at the very least, reflect on theses issues and find a compromise.

R016:

We wish to express our opposition to any plans to develop this green area in any way, shape or form - either housing or industrial units.

The Localism Act of 2011 was to encourage the expansion of the provision of green spaces to encompass leisure and recreational activities and if possible food growing - **NOT THE REDUCTION OF GREEN SPACES.**

There is also a major issue here with regard to emissions given the proximity to the M1/M69/A46 junction which has already increased them in this area to an unreasonable level given the Government objective to achieve 0 emissions by 2030. Any development will also add to the negative effect of light pollution from street lights etc - reference the University of Exeter Study March 2020,

Given the amount of time this green space has been left to its own devices the amount of wild life has increased dramatically (bear in mind that in the past several areas were declared "Nature Reserves"). It is also a fantastic area for pollinators which we all know are essential to the health of the planet.

The wild life list is endless as everyone who uses this area knows but just as important are the trees and bushes/shrubs - **WHICH WE ARE SUPPOSED TO GROW MORE OF, NOT GET RID OF** - which are crucial for cleaning the air we breathe and just as importantly are necessary for good drainage especially in an area of clay such as this.

We urge the Council to seriously consider all of the negative effects that developing this site would create and look for alternative Brown Field sites to meet future housing requirements

R017:

I am writing to object to the plan to redevelop the former golf course, part of which lies within Blaby District and forms a green space for recreation, exercise, dog walking etc at the edge of Glenfield and is used daily by many Glenfield residents. It formed a valuable amenity during the Covid lockdown and is an important green space in the village.

In recent years Glenfield residents have had their green space dramatically reduced by the development of warehousing and a housing estate spreading from Main

Street to the motorway access. We have also lost valuable green space along Gynsill Lane and there are now very few areas within Glenfield to walk in an open landscape.

I object strongly to the plan to remove the our last remaining open space, the "lungs" of the village, and replace it with more buildings and traffic to further pollute the environment.

R018:

Regarding the above I understand all of the land is owned by Leicester City Council but Blaby lies within a third of this. I strongly object to any proposed development of this land as Glenfield Park development is so extensive and stretches to the motorway. Any more development would be excessive.

R0019:

I have lived in Leicestershire since 1985, & Glenfield since 1998.

Many thanks for putting together the Glenfield Neighbourhood Plan. Overall, I feel it is a very well written document.

I am writing with my views on it, below, & would greatly appreciate it if they are taken into consideration: clearly the local Councils should take note and act on the views of the people, and some of the City Council decisions feel painfully like the majority views have been ignored :(

My main concern is the proposed City Council developments aimed at obliterating the old Western Park Golf Course (hereafter referred to as **WPGC**), creating industrial units, a previously unmentioned waste disposal centre and hundreds of houses.

I have already given a response to the Leicester City Council Consultation to vehemently oppose SL02 - WPGC - from being built upon.

Leicester claims to be an eco-friendly City - I remember walking around the Eco House before the City Council let it go into disrepair: I remember when Leicester was Britain's first environment city.

The times and aspirations of the current Mayor have changed dramatically since those days.

Removing the amazing space that the old WPGC is represents a remarkably twisted travesty of thinking - it is already home to so much flora and fauna, and of course planting a couple of trees or sedum roofs on bus shelters is nothing compared with the huge number already present and providing that feature. Instead of building upon the WPGC, it should be rewilded and become a nature park to be visited and walked around.

Across the UK, Councils are realising the value of large open spaces, and actively rewilding them:

- Up the road in Derby - <https://www.derby.gov.uk/news/2021/november/allestree-park-uk-largest-urban-rewilding-greenspace>
- Nearby Lincoln - <https://www.leicestermercury.co.uk/news/leicester-news/former-gold-course-near-mablethorpe-7375487>
- Exeter and Sunderland - <https://www.thegolfbusiness.co.uk/2021/10/two-golf-courses-to-be-converted-into-eco-parks>
- Cheshire - <https://www.theguardian.com/environment/2022/dec/25/frodsham-cheshire-golf-course-transformed-woodland>

I would love our Parish and Blaby District Councils to help get behind this sort of initiative for our WPGC.

I am quite alarmed by Para 4.24 in the Leicester City Local Plan:

"4.24 The Local Plan identifies 52.1 ha of land in the western part of the city within the Leicester city administrative boundary. This land forms part of a larger area which lies within Blaby District Council but is owned by LCC. The two councils plan to work together in bringing the wider piece of land forward for development."

I am sure part of that "working together" would be a major highway access from the Ratby roundabout mentioned in the City's Local Plan. This will cause a big increase in vehicle movements to surrounding networks, including Glenfield. As a consequence of this, not only would we lose an important carbon capture area, we will also have much increased air pollution. The Waste Site proposed would also invariably create dust and odour which would hit Glenfield.

We need our local Parish and Blaby Councils to fight against such loss.

I note in the Foreword that "This Plan seeks to ensure that Glenfield will remain as a separate identity retaining its unique and distinctive character". All the plans for WPGC would remove the Green Wedge, an incredibly important thing, and blur the entire area with Kirby Muxloe. Those are quite clearly the goals of the current Mayor of Leicester, but they go against the vast majority of the wishes of local people, and the Parish & Blaby District Council must do all it can to oppose such development.

One of the key objectives, as stated in the plan, is to **"to ensure the places we cherish are bequeathed to the next generation in a better condition than they are now"**

If we allow the WPGC to be obliterated, we will be letting those future generations down badly. The benefits to all the people who currently enjoy the WPGC are vast: improve their physical and mental health, learning about the environment, and

improving air quality.

Once an area like WPGC has been developed, it is gone forever.

The Parish and Blaby District Council MUST oppose any development there.

This is the only way to also meet the first two of the SOCIAL goals: **"To safeguard existing open space for the enjoyment of residents"** and **"To protect existing community facilities"**

Equally, it is the ONLY way to meet two of the ENVIRONMENTAL goals: **"To protect important open spaces from development"** and **"To protect and, where possible, improve biodiversity and important habitats"**

In 4. A Vision for Glenfield, the plan states **"By 2029, Glenfield will be a vibrant, healthy, well balanced community that continues to be a great place to live, to be educated, to work and to visit whilst maintaining its historic character and separate identity with an attractive conservation area and variety of open spaces."**

I can only emphasise again how the development of the WPGC will just destroy the very things the Vision for Glenfield holds dear.

Later, in Objective 6, I am pleased to read **"Locally important openspaces, biodiversity and amenities are to be protected and enhanced wherever possible"**. This can only be held true if the development of the WPGC is prevented.

"Working together to reduce the levels of particulates, CO2 and other noxious emissions will help mitigate the impact of climate change. This includes the protection of the natural environment and ecology of the parish". Again, the Parish and Blaby District Councils must strongly fight any development of WPGC - it forms the bulk of the green space within the Parish, and has to be a large contributor to reducing the particulates all around the existing buildings and warehouse areas.

It was reassuring to read in the introduction part of B. The Natural, Historic and Social Environment that the respondents to a local survey were overwhelmingly **"arguing for more green spaces if possible and no more loss to other uses"**. The WPGC is THE major green space within Glenfield and must remain so.

The Natural Environment again reiterates that **"wildlife corridors as remain are essential to prevent local extinctions"**: the WPGC is the major contribution to the biodiversity that exists.

To me, and backing up all I have written above, the "Local Green Spaces" part of the Plan is the most important element.

POLICY ENV 1: LOCAL GREEN SPACES states that the 17.8ha of **"Blackthorn Green and Fishley Belt (OS08)"** should not be developed on, and I feel this is critical for so many reasons: biodiversity, health of the hundreds of people who use

the WPGC, maintaining the Green Wedge which is so vital to Glenfield maintaining an identity.

I wholeheartedly applaud the **POLICY ENV 7: AREA OF SEPARATION** part of the Plan. The statement "**Development proposals in this area will only be supported if they are located and designed, to maintain or where possible enhance the area's 'open countryside' character and its recreational and ecological value**" clearly opposes the City Council Plan - their proposals completely destroy the recreational ecological value and totally remove the 'open countryside' character.

There is no way any development on the area outlined (the WPGC) would leave such a separation, and the identification of Glenfield would be forever lost.

It is very clear that destroying such a green space as the WPGC will be detrimental to any aspirations to help counter Climate Change.

On p54, in "**D Community Facilities, Health and Well-Being, Transport 54 and Employment**".

This confirms an "**Asset of Community Value**" as "**a building or other land (whose) main use has recently been or is presently used to further the social well-being or social interests of the local community and could do so in the future**".

The thousands of people who signed the petition to the original City Council consultation, and hundreds of other objections, all serve to confirm how valuable the WPGC is to the residents of Glenfield and beyond.

I believe the Plan must recognise and specifically call out the fact that the WPGC is an Asset of Community Value.

Every day sees many people using the space. During Covid, it proved to be a lifesaver to many, including me and my family. The health benefits to the population of areas of green space is clearer now than it has ever been, and the Parish and Blaby District Councils need to encourage that by fighting any development of WPGC.

Please add WPGC to **POLICY CF1: THE RETENTION OF COMMUNITY FACILITIES AND AMENITIES** - call it out specifically by adding in the brackets as an existing community facility.

In a similar vein, please specifically add it to **POLICY CF2: NEW OR IMPROVED COMMUNITY FACILITIES** - it should be an area we aspire to improve, through both re-wilding efforts as well as perhaps creating paths around.

In **POLICY CF 7: WALKING FOR RECREATION AND AMENITY**, there must also be some mention of the space offered by the WPGC.

I hope this information helps shape the Plan further, and indeed help preserve the fabulous natural area we have on our doorsteps.

C007: National Gas Transmissions (submitted by AvisonYoung):

National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Gas Transmission

National Gas Transmission owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.

Proposed sites crossed or in close proximity to National Gas Transmission assets:

An assessment has been carried out with respect to National Gas Transmission's electricity and gas transmission assets which include high voltage electricity assets and high-pressure gas pipelines. National Gas Transmission has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

National Gas Transmission provides information in relation to its assets at the website below.

- <https://www.nationalgas.com/land-and-assets/network-route-maps>

Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.

Distribution Networks

Information regarding the gas distribution network is available by contacting: plantprotection@cadentgas.com

Further Advice

Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included: nationalgas.uk@avisonyoung.com

C008: National Grid Electricity Transmission: (submitted by AvisonYoung):

Representations on behalf of National Grid Electricity Transmission

National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.

About National Grid Electricity Transmission

National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales. The energy is then distributed to the electricity distribution network operators, so it can reach homes and businesses.

National Grid no longer owns or operates the high-pressure gas transmission system across the UK. This is the responsibility of National Gas Transmission, which is a separate entity and must be consulted independently.

National Grid Ventures (NGV) develop, operate and invest in energy projects, technologies, and partnerships to help accelerate the development of a clean energy future for consumers across the UK, Europe and the United States. NGV is separate from National Grid's core regulated businesses. Please also consult with NGV separately from NGET.

Proposed development sites crossed or in close proximity to NGET assets:

An assessment has been carried out with respect to NGET assets which include high voltage electricity assets and other electricity infrastructure.

NGET has identified that no assets are currently affected by proposed allocations within the Neighbourhood Plan area.

NGET provides information in relation to its assets at the website below.

- www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/

Please also see attached information outlining guidance on development close to NGET infrastructure.

Distribution Networks

Information regarding the electricity distribution network is available at the website below:

www.energynetworks.org.uk

Further Advice

Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets. We would be grateful if you could add our details shown below to your consultation database, if not already included:

Nationalgrid.uk@avisonyoung.com

R020:

I **Redacted** would like to raise an objection to the development of the western golf course.

I walk round this golf course with my dogs & children and have done for several years. I have taught my children about wildlife & seen some truly stunning scenes..sunrises sunsets snow sun etc...they play and meet friends

POLICY SL02

This strategic opportunity comprises the majority land area of a former golf course (Site 702). The site is within a high-scoring portion of Green Wedge land. The draft allocation leads to the loss of the Green Wedge but is outweighed by the strategic opportunity of the site, as a natural extension of the existing residential estate served by Ryder Road and the industrial estate served by Scudamore Road, to help meet the City's housing and employment needs over the Plan period. The strategic opportunity of the former golf course extends beyond the City boundary to the north-west on land (also within Leicester City Council's ownership) within the administrative area of Blaby District Council. Whilst the site is considered suitable

primarily for housing (including the provision of some plots for custom & self-build dwellings) and employment development, with provision made also for new public open space, the site is also suitable to accommodate the City's need for 7 permanent pitches for Gypsies & Travellers. The wider strategic opportunity, beyond the City boundary, may also make provision for supporting/ancillary retail and/or food and drink uses."

Source: Strategic Sites Allocations (September 2022)

Suitability Summary

"Greenfield site within Green Wedge (GW score 4). Subject to protection of Local Wildlife Site (LWS) and comprehensive highways access for this and adjoining land in Blaby, site is suitable for mixed use development including Gypsy & Traveller pitches. In addition to usual planning requirements development will need to address: flooding; ecology; trees and hedgerows; archaeology; heritage; air quality; traffic noise; highways access; and sport provision."

Source: Strategic Sites Allocations (September 2022)

Please think of the freedom and mental well being of our younger generation when considering putting development opportunities ahead of their well being.

It's more important now than ever to ensure that people have nature and space around to relax and unwind safely.

Why is it suitable to accommodate permanent gypsy traveller pitches when it wasn't in 1999. What has changed? Planning Number 19990808.

I am unable to see how removing the golf course would assist flood/ run off?

Diagram 10 on page 150 of the Local Plan clearly shows three heritage assets and an historic road crossing the golf course. This is almost certainly a Roman Road.

It's really important to teach our children about history & provide them with the opportunity to learn safely.

I fear that removing this space from our children will seriously affect their mental health and well being & adults.

For many this area provided solace beauty and space throughout covid.

It can be a social place.

I walk my dogs here every day and meet many others on my walk.

It has certainly helped me to look after my own mental health & meet the needs of my children allowing me to continue nursing throughout the pandemic.

Please think of our younger constituents and try to protect the little green space we have.

Thankyou for your consideration.

R021:

I whole heartedly support and approve of the Glenfield neighbourhood plan as it currently stands, however, it is now under significant threat from the Leicester local plan.

Therefore, I would object to any reduction of our green spaces, especially the area of the old golf course, as this is a very mature bio diverse space with thousands of trees that are at risk. The old golf course provides a healthy local environment and recreation for Glenfield residents which sits inside the M1-A46 corridor.

Our current services would not be able to sustain the volume of infrastructure proposed without additional services creating more building requirements.

If the City's proposal goes ahead then the Glenfield neighbourhood plan will be meaningless and may as well be confined to the bin, you can also say goodbye to Glenfield being a village.

R022:

We wish to oppose any development on the old western park golf course, in the words of our prime minister, we will protect our precious natural environment, because the green fields of our land are an inheritance worth preserving for our children and grand children, regards Andrew and Pauline Westwood.

R023:

Dear Sir/Madam,

I would like to object to the current neighbourhood plan for Glenfield.

I have a number of objections, and I would like to start with the deed for the Western Park golf course land. The land was gifted to the people of Leicester as a green space. The city council managed the land for a number of years as a golf course, and locals were able to access the land. Now it is proposed that the land is sold off yet again to private owners. I think it is a huge mistake. Glenfield and Braunstone Frith already lack green space, and the old golf course is our small piece of green heaven in a built-up suburban area. If people wanted to access a similar place, they would need to travel to Bradgate park. Bradgate park is not served well by local buses meaning you would have to drive there and pay a parking fee. Access to green spaces seems to be reserved for wealthier people.

The golf course is a fantastic location for many pet owners to take their dogs for a walk, as the area is fenced. It is also a safe area for children to play and people to run and look after their mental health.

The planning document states, “To safeguard existing open space for the enjoyment of residents”. However, if the golf course gets sold, that is not what will happen. Glenfield already lacks green spaces. It is not a “garden village”.

It also states, “To ensure that any new housing meets the needs of present and future generations”, I would like to know how the need is going to be met. Will these new houses and buildings be built with new technology like heat pumps to minimize our carbon footprint? Or are they going to be built houses that will need to be refurbished in 20 years’ time? How are you able to meet the climate change targets when you are bringing more cars, trucks and buildings to the area?

“To ensure that housing development does not harm but positively reflects the existing and historic character of the area”. There are many different types of housing in Glenfield with different designs, I think this needs to be explained more specifically to residents so we know how the village will look going forward.

“To protect important open spaces from development”. Much research has been completed which looks into green space and mental health. Nuttsford, “... found that decreased distance to useable green space and increased proportion of green space within the larger neighbourhood were associated with decreased anxiety/mood disorder treatment counts in an urban environment”. I would like to point out that the old western park golf course is one of the only green spaces for Glenfield residents to access. Many people living in Glenfield will be much further than 3KM to a green space if the golf course is built on. How much will it cost in the long run to treat people with mental health issues, and what will the loss be to the economy? I think the plan to build on the land is short-sighted.

If the land is built on, how will your pledge “To protect and, where possible, improve biodiversity and important habitats” be fulfilled?

“To protect existing employment uses”, I think Glenfield is positioned well for employment, we have the city 3 miles away, and there is the industrial estate with DPD and Everards, the County Council building lies in Glenfield and the hospital. Glenfield has lots of industry already I do not think it is proportionate to build more. We need to diversify for people living in parts of the country without work. Glenfield may be considered greedy by some.

I think it is naive to think that Glenfield can be a place for small work units. Glenfield has so much industry already and I think there is a greater need in parts of Leicester that are struggling such as small rural villages and towns. With Fosse Park only a 10-minute drive I do not think people are going to spend locally as it often costs more, and the high street chains are all in one place. The idea is ideological and ignores real-life behaviour and spending power. Fosse Park has not helped local SME’s, in my opinion, it is a soulless place with no character, and I avoid it at all costs, especially at the weekends, as the traffic is very busy.

The plan then moves on to Objectives:

“5) Home working is supported to promote opportunities within the village to allow businesses to develop and grow. The provision of business hubs, meeting spaces and workshops could create opportunities for villagers”. – I think this could be a good

idea, it would be nice to have a nice café in the village however I do not know what sort of uptake the business will have, especially with the lack of parking in the village.

There is a lot in the plan which speaks about green spaces and biodiversity:

“6) Locally important open spaces, biodiversity and amenities are to be protected and enhanced wherever possible”.

&

“This includes the protection of the natural environment and ecology of the parish, promoting sustainable travel and encouraging recycling, repair and renewal. Much of this will revolve round advocacy and education to engender behaviour change”.

&

“8) Maintaining a healthy population will be achieved by protecting and enhancing green amenity areas, supporting extensions to the public footpath network to link important community facilities where appropriate and by providing sports facilities and promoting healthy lifestyles”.

I do not understand how the open spaces and biodiversity will be protected if we build on the only green space left in the village? People want to walk in green spaces, not on the streets and I think it is important for the local community to own green space around them so it cannot be privatised again. The public’s right to land is already very limited let’s not increase those limitations. I appreciate that we need homes and jobs but I do not think Glenfield is the place where it is needed. As mentioned earlier we have multiple employment opportunities including the council, hospital and industrial estate.

House building:

“We urge Blaby District Council to support our ambition to ensure that new homes are built to much higher environmental standards and to encourage improvements in the energy efficiency of existing properties moving towards cleaner means of heating homes in order to move towards a carbon neutral situation earlier than the national target of 2050. Retrofitting homes can play a major part in reducing carbon emissions”. – How will the homes be built? I do not think we should build houses that are going to need to be retrofitted in 10 years’ time.



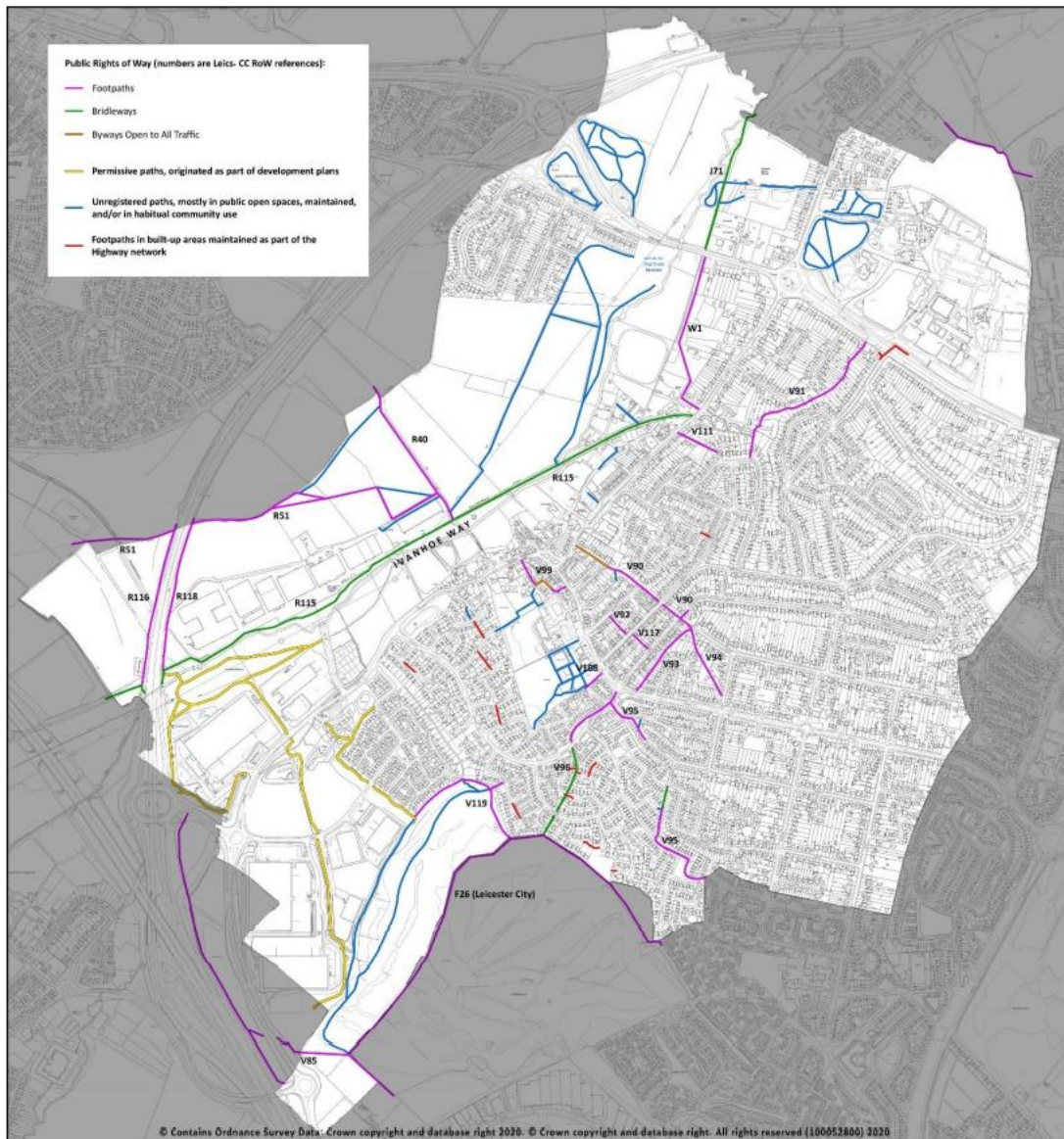
Above is a map taken from the plan, which highlights in green all of the green spaces in the village. It takes about 18 minutes to walk from the red dot to the large green space. The other green spaces on the map are small, and you could walk around them in a few minutes. The government wants everyone to have a green space within 15 minutes of walking distance, and they plan to restore nature. We do not currently have that. We are 3 minutes off, if the council builds on the golf course, we will be even further from green spaces. In addition, how will the elderly/disabled access the green spaces if they have to travel further? People in Glenfield are being priced out of green spaces and forced to drive to country parks such as Bradgate park or Beacon hill, which will not help with the reduction of CO2 emissions. Finally, I think it is unfair to poorer people who cannot access cars or can't drive to the nearest green space; it seems that the green spaces are reserved for wealthy people.

The Ivanhoe way is nice. However, it is just a pathway that lasts about 2 miles, and again, it takes me about 15 – 20 minutes to walk there from my house in Glenfield. The pathway is concrete, so I do not know how the area can be classed as green.

The plan states, "The Climate Change Act 2008 commits the UK to an 80% reduction in CO2 emissions by 2050". Glenfield already has pollution from the M1, A46 and A50 on its doorstep. What will happen if we have additional traffic in the village? Will the levels of pollution in the air be safe for the residents?

The below map has been taken from the plan to show the existing rights of way within the village. As you can see, they do not join up very well, and each walk is very short, apart from the golf course. In addition, the rights of way are all near very busy A roads, it is unsafe for families, pet owners, the disabled or elderly, plus there

is a lot of pollution from the vehicles on the road. When the government says “restore nature” what does that mean and how would they like it to positively impact the people?



“POLICY CF 7: WALKING FOR RECREATION AND AMENITY – Development proposals that result in the loss of, or have significant adverse effects on, the existing composite network of walking routes (Figure 20) will not be supported without appropriate mitigation.”

Overall, I do not think the plan is realistic for Glenfield as a village, and if the plans are allowed, I think people in this village will move elsewhere. The village will not be suitable for children, families, or elderly people as there won't be safe, quiet spaces or the access to get there will be so great that they miss out.

Please consider the people in the village and the impact it will have on them. I am confident other places are more in need and would benefit from such development.

R024:

I feel this plan is flawed and goes against any sense of democracy, given that most if not all of my Glenfield neighbours are totally against the development.

The imposition of this top down pressure to submit to these plans is outdated and undemocratic.

The recent pandemic has highlighted the human condition need for open spaces and how this enhances mental health and well-being. The area is well use by local residents and others who live in Leicester. In proof of this you only need to look at an arial photo which you can observe well established tracks.

In my view a better plan would be to follow the lead of other Authorities which in similar circumstances have chosen to develop these areas into leisure parks and rewilding some spaces.

Please, please stop this attack on our neighbourhood and quality of life.

R025:

Please do not allow the removal of this fantastic natural open space! to steal this beautiful landscape from our children and grandchildren is a crime in the making. Anyone with an ounce of common sense, surely can see it is a massive wrongdoing.

R026:

Having read the draft Glenfield Neighbourhood Plan 2022 – 2029 (The Plan), I am in full support of all of the policies proposed therein. I would particularly draw attention to the following.

I have been a resident of Glenfield since 1973. There has been substantial development in and around Glenfield in recent years and there has been a consequential loss of green space, increased traffic load, parking congestion, noise and, as evidenced by the plan, a corresponding deterioration in air quality. The Plan clearly seeks to ensure that any proposed developments do not lead to further deterioration.

Whilst advocating for the approval of The Plan in its entirety, I would highlight the following points in particular relating to current proposals.

Proposal 1 - Proposed construction of 2 semi-detached houses on the current car park at Station Road, Glenfield.
Current Planning Application No. 22/1049/FUL

Proposal 2 - Leicester Local Plan – Publication Draft 2020-206 Consultation - Policy SL02 - Proposed Development of Former Western Park Golf Course
Current Draft Plan

Glenfield Neighbourhood Plan Policy	Impacted by Current Proposals	Proposal 1	Proposal 2
H3	Paragraph specifies that site developments must not result in a loss of amenity for current occupiers. This should also refer to loss of amenity (including car parking) for existing community premises users	✓	
ENV1	The expected deletion of the current Green Wedge Policy relating to site OS08 should be resisted	✓	✓
ENV2	As evidenced in the plan, Glenfield already has poor air quality. Proposed developments, and the possible loss of green space (site OS08) would lead to poorer air quality.		✓
ENV3	The entirety of this policy is important		✓
ENV6	Proposed developments, and the possible loss of green space (site OS08) would be contrary to this very important policy.		✓
T1	Traffic in Glenfield has increased significantly following Optimus Point and Kirby Lane industrial and residential developments. Further development that would increase traffic even more should not be approved. Paragraphs b) and d) relate particularly to current proposal 1	✓	✓
T2	The Plan highlights the current shortage of off-street parking in Glenfield.	✓	
CF2	Traffic in Glenfield has increased significantly following Optimus Point and Kirby Lane industrial and residential developments. Further development that would increase traffic even more should not be approved. Paragraphs c) and e) relate particularly to current proposal 1	✓	✓
CC1	Properties along Kirby Lane are low-lying relative to the current green wedge. Development of the green wedge would increase the risk of flooding due to run-off.		✓

I hope therefore that The Plan is accepted in its entirety.

C009: Leicester City Council, Estates (submitted by Freeths)

These representations are provided by LCC as a landowner within the GNP area and a separate submission will be made by LCC in their role as Local Planning Authority. LCC submitted representations to the Regulation 14 consultation, dated 10 December 2021.

General Comments

Background

2. Blaby District Council (“BDC”) will be aware that LCC as landowner, is promoting a cross administrative boundary site known as the Western Park Golf Course (“WPGC”) through the emerging Leicester Local Plan and the new Blaby Local Plan. The land within the GNP area falls within the administrative boundary of BDC. Since our Regulation 14 submission to the GNP consultation, the Leicester Local Plan Submission version November 2022 (Regulation 19) has been subject to consultation between January and February 2023. The WPGC is proposed for allocation in the Leicester Local Plan for 412 dwellings, 9.74ha of employment land and various other uses including extensive public open space. 3. The Regulation 19 version of the Leicester Local Plan identifies an overall housing need of 39,424 homes across the plan period. However, a significant proportion of that need will have to met outside of LCC’s administrative boundaries, with 20,730 dwellings targeted within the City

4. Since our previous representation the BDC new Local Plan does not appear to have made any meaningful progression and so the last published document was a Regulation 18 document, which was subject to consultation between January and

March 2021. Site GLE031, part of the WPCG, identified the site for 'reasonable further consideration' and with an indicative capacity of 252 dwellings and circa 39,000m² of employment land. This is in addition to the development proposed within LCC administrative boundary.

5. For the GNP to be put to referendum and be 'made' the GNP will need to meet a set of basic conditions. The basic conditions are set in paragraph 8 (2) of Schedule 4B to the Town and Country Planning Act 1990 (as amended) and Paragraph 065 (Reference ID: 41-065-20140306) of the Planning Practice Guidance ("PPG")

6. The basic conditions are:

- have regard to national policy and guidance (condition a)
- contribute to the achievement of sustainable development (condition d);
- be in general conformity with the strategic policies in the development plan for the local area (condition e)
- not breach, and otherwise be compatible with, EU obligations, including human rights requirements (condition f); and
- comply with any other prescribed matters (condition g) including ensuring that the plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017;

Relationship with Emerging Local Plan

7. The PPG Paragraph: 009 Reference ID: 41-009-20190509, provides guidance on the relationship between emerging Neighbourhood Plans and Local Plans. It states: *"Although a draft neighbourhood plan or Order is not tested against the policies in an emerging local plan the reasoning and evidence informing the local plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested."*

8. Further it explains:

"Where a neighbourhood plan is brought forward before an up-to-date local plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:

- the emerging neighbourhood plan
- the emerging local plan (or spatial development strategy)
- the adopted development plan

with appropriate regard to national policy and guidance."

"The local planning authority should work with the qualifying body so that complementary neighbourhood and local plan policies are produced. It is important to minimise any conflicts between policies in the neighbourhood plan and those in the emerging local plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan."

9. In our Regulation 14 submission, we stressed the importance of an open dialogue between the relevant LPA (and indeed in this case the adjoining LPA) and the qualifying body to ensure that emerging plans are consistent with each other. Whilst the BDC Local Plan has not progressed significantly since our previous

representations it remains evident that there are a number of policies within the GNP submission version which run counter to the proposed allocation of WPGC and will create a conflict for the strategy for delivering housing and employment in the neighbouring authority of LCC. In summary we re-iterate our objections from the Regulation 14 consultation, amended where necessary, and these are set out below.

Specific Comments

Policy ENV 1: Local Green Spaces

10. LCC OBJECTS to the inclusion of Blackthorn Green and Fishley Belt (OS08) as a Local Green Space. We re-iterate our objection from the Regulation 14 consultation.

11. Paragraphs 101-102 of the NPPF (2021) relate to the designation of land as Local Green Space through local and neighbourhood plans. Paragraph 101 has an overarching test which states that *“Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services.”*

12. Paragraph 102 then sets the tests of designating a specific area of land for Local Green Space. It states that designation should only occur where the green space is;

(a) in reasonably close proximity to the community it serves

(b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

(c) local in character and is not an extensive tract of land.

13. The proposed designation of OS08 would cause significant harm to the delivery and the viability of the proposed strategic allocation at the WPGC. This is a major strategic emerging residential and employment allocation and if it is constrained by a significant proportion of the site being designated as Local Green Space (approximately 17.6-17.8ha), there is inconsistent referencing on size) this could compromise the delivery of the allocation and consequently the soundness of the emerging Local Plan. The proposed WPCG is being masterplanned holistically so that it can be brought forward in an integrated manner, delivering housing and employment but set within an extensive network of green infrastructure of circa 24 ha. The proposed designation of OS08 as Local Green Space will severely constrain investment in housing and jobs and is not consistent with planning for sustainable development in the context of meeting housing and employment need in the local area. The integration of green space is a fundamental principal of the master-planning exercise for the WPCG, but this should be undertaken in a collaborative, cohesive manner, not in isolation of consideration of wider strategic needs. The PPG Paragraph: 007 Reference ID: 37-007-20140306 states *“plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.”*

14. On the above basis we submit that the proposed Local Green Space is contrary to Paragraph 101 of the NPPF and consequently should fail the basic condition test of being consistent with national policy.

15. In respect of the tests under Paragraph 102 of the NPPF we previously raised concerns regarding the background evidence for justifying sites selection as Local Green Spaces within Appendix 4 of the GNP 'Environmental Inventory'. These concerns remain. The Environmental Inventory provides a scoring system based on set criteria and methodology with the categories reflective of the tests of Paragraph 102 of the NPPF. The supporting text for Policy ENV1 advises at Page 32 that the scoring threshold for designation as a Local Green Space is 18/25. It advises that this is the 'locally agreed appropriate threshold' albeit it is not clear on what basis this has been determined.

16. There are a number of concerns over the scoring criteria which affects the overall score. For example, under the 'beauty' category it provides a range of between 0-3 but no distinction of how a site should be judged within this range. The text states "*only the most attractive land in the Plan Area should qualify – most sites should get '0'.*" Contrary to this statement, only a single site of the 44 assessed is scored 0 and there is nothing within the assessment to assist the reader on how the judgements are differentiated. Similarly, under tranquillity the supporting text again advises that most sites should get '0' and that 2 (the highest score) in this category will be probably limited to church yards, well-designed memorial gardens, managed semi-natural habitats. Given OS08's position adjacent to existing employment development to the north west and the proximity of the M1 to the west, it is unclear how the site has recorded the highest possible tranquillity score. The absence of clear criteria on how sites are ranked causes doubt into the objectivity of the process and based on the evidence in Appendix 4 the designation does not meet the test of being demonstrably special to its local community and holding a particular local significance. The proposed designation is contrary to Paragraph 101 of the NPPF and consequently again should fail the basic condition test of being consistent with national policy.

17. Finally, we submit that at 17.8ha the area proposed for designation is not 'local in character' and represents a significant tract of land, contrary the test of Paragraph 102c of the NPPF.

Policy ENV 3 : Important Open Spaces

18. LCC OBJECTS to the inclusion Blackthorn Green and Fishley Belt (OS08) an Important Open Space. The reason for objection is similar to the Local Green Space designation in that it constrains the delivery of an emerging strategic allocation and fails to account for the potential of opportunities presented by the wider WPGC. A designation as Important Open Space would significantly limit the viability of the WPGC in that it would require that either this part of the site be undeveloped or that equivalent alternative land be found elsewhere, most likely in the wider scheme. In practice, as referenced above, the wider strategic site will include circa 24 ha of green infrastructure, but this will be designed and considered across the whole strategic site and provide connectivity and recreation opportunities. This policy threatens the delivery of sustainable development through meeting housing and employment need, which can be delivered alongside an attractive accessible open space network.

Policy ENV 4 : Sites of Natural Environmental Significance

19. LCC OBJECTS to Policy ENV 4 - Sites of Natural Environmental Significance. There are a number of concerns with this policy. Firstly, it is unclear on what basis

the sites have been identified as having 'natural environmental significance' or how they have been classified as being either 'ecologically important' or locally valued.

20. The policy states "*Proposals going forward should plan for and deliver a biodiversity net gain of 20% (on-site wherever possible) through the mechanisms described in the Environment Act 2021.*" The Environment Act will mandate a minimum 10% biodiversity net gain. There is no justification for why these sites have been identified as having a requirement for a higher net gain percentage or whether that is even achievable.

21. Figure 9 identifies 'Sites of natural environment significance' but OS08 does not conform to the key to identify such sites. It is very unclear whether OS08 is actually proposed as a site of natural environmental significance.

Policy ENV 7 : Area of Separation

22. LCC OBJECTS to Policy ENV 7: Area of Separation. The proposed area of separation largely reflects the land that is identified as Local Green Space. The policy explains that the purpose of the area of separation is to prevent further physical and visual coalescence of the City of Leicester with south Glenfield. However, as stated previously, in isolation this area of separation is ineffective as a spatial tool to deliver settlement separation, largely because the areas have already merged to the east. The policy or supporting text does not explain why these areas should be distinct or that they have differing character or identities.

23. Whilst it is appreciated that this strip of land already benefits from protection as part of the Green Wedge within the Blaby Development Plan, in separation terms it is reliant on land within LCC's administrative boundary as part of a wider Green Wedge. This land within LCC is proposed for allocation within the Leicester Local Plan (submission version) and the WPGC allocation will limit this area of separation to a narrow strip of land.

24. Furthermore, as with objections to previous policies, this policy has the potential to affect the deliverability and viability of the wider WPGC strategic allocation, reducing the ability of the remaining land to accommodate required levels of housing and employment. Consequently, it is submitted that any restrictive policies should be considered in parallel with emerging development needs in order to achieve sustainable development.

R027:

I wish to submit my comments concerning the Glenfield Neighbourhood Plan, with particular representation concerning the future of the former Western Park Golf Course, site OS08, that falls within the Blaby District Council boundary. I have submitted comments on the recent Leicester City Council Plan and acknowledge that the majority of this site falls within the City boundary, rather than Blaby District, however it is important to save as much of this site as possible.

Page 9 of the Glenfield Neighbourhood Plan states:

The Neighbourhood Plan seeks to meet its commitment to promoting sustainable development in the following ways:

a) *Social*

- *To safeguard existing open space for the enjoyment of residents;*
- *To protect existing community facilities; and*
- *To ensure that any new housing meets the needs of present and future generations.*

b) *Environmental*

- *To ensure that housing development does not harm but positively reflects the existing and historic character of the area;*
- *To protect important open spaces from development;*
- *To ensure that the design of development enhances the Parish's special character and identity;*
- *To protect and, where possible, improve biodiversity and important habitats; and*
- *To provide for improved pedestrian and cycling facilities, as appropriate.*

The former Western Park Golf Course, site OS08, must be protected by the plan.

Social:

This is an existing open space already enjoyed by a number of local residents, some on a daily basis, some less frequently and therefore must be safeguarded. Residents enjoy walking, running and wildlife spotting on this site and was discovered by many during to coronavirus lockdown; it became a community facility for daily walks that were permitted at that time and people have continued to enjoy the area ever since.

Environmental:

Any housing development would destroy the existing and historic character of the area. It has been a wide open space used by the community for many years, either as a golf course or more latterly an area of recreation and natural tranquillity. The character would be destroyed by the development that Leicester City Council proposes for housing, industrial units, traveller pitches and waste recycling site. None of the current character could be retained if such a development were allowed to go ahead. It is an important open space that must be protected from this type of significant, destructive development. The former Western Park Gold Course site is currently a wildlife haven for a wide variety of mammals, birds, invertebrates (including moths and butterflies), reptiles (including great crested newts), fungi, wild flowers and plants. Whilst some of these have been logged via NatureSpot, it is not a full biodiversity survey. There have also been previous surveys conducted on behalf of the BTO (British Trust for Ornithology) on the site. The site provides essential habitat for species that are on the decline. It should also be noted that whilst some of the typical garden birds can be seen on the site, many of these are in significant decline nationally, for example thrushes, whose numbers have fallen by a staggering 81% since the 70s, greenfinches whose numbers have fallen by 70% and sparrows, whose numbers have fallen by 58% over the same time. Sparrows in particular are often seen on the golf course and a destruction of their habitat would further contribute to this decline. Biodiversity would significantly decrease if this site were to be developed.

Page 16 of the Glenfield Neighbourhood Plan states that we should be:

Working together to reduce the levels of particulates, CO₂ and other noxious emissions will help mitigate the impact of climate change.

This includes the protection of the natural environment and ecology of the parish, promoting sustainable travel and encouraging recycling, repair and renewal. Much of this will revolve round advocacy and education to engender behaviour change.

The Woodland Trust states (<https://www.woodlandtrust.org.uk/trees-woods-and-wildlife/british-trees/how-trees-fight-climate-change/>):

“Trees are the ultimate carbon capture and storage machines. Like great carbon sinks, woods and forests absorb atmospheric carbon and lock it up for centuries. They also fight the cruel effects of a changing climate. They can help:

- Prevent flooding
- Reduce city temperature
- Reduce pollution
- Keep soil nutrient-rich”

The site has trees in abundance. Any destruction of these trees will release the carbon stored within them and any replacement with saplings will take many years to reach the levels of carbon capture of the current mature trees.

According to the government (<https://www.gov.uk/government/publications/air-pollution-applying-all-our-health/air-pollution-applying-all-our-health>):

“In the UK, air pollution is the largest environmental risk to public health. The annual mortality of human-made air pollution in the UK is roughly equivalent to between 28,000 and 36,000 deaths every year. It is estimated that between 2017 and 2025 the total cost to the NHS and social care system of air pollutants (fine particulate matter and nitrogen dioxide), for which there is more robust evidence for an association, will be £1.6 billion. Air pollution can cause and worsen health effects in all individuals, particularly society’s most vulnerable populations. Long-term exposure to air pollution can cause chronic conditions such as cardiovascular and respiratory diseases as well as lung cancer, leading to reduced life expectancy. Short-term increases in levels of air pollution can also cause a range of health impacts, including effects on lung function, exacerbation of asthma, increases in respiratory and cardiovascular hospital admissions and mortality.” The site is bordered by industrial units (as associated HGV activity) on the Scudamore Road estate and Optimus Point and close to the A46 dual carriageway and M1 motorway. If the site is developed, it will destroy a large area that currently works helps to reduce the pollution in the city and surrounding villages. To lose this essential source of pollution reduction is madness.

It is clear from these statements, that the former Western Park Golf Course, site OS08 is a great asset to the village, parish and district in terms of mitigating the effects of climate change. To destroy this climate asset in the name of development would be a significant barrier to the councils achieving CO₂ and pollution maintenance, never mind reduction.

Page 31 of the Glenfield Neighbourhood Plan states:

Natural environment

With more than half its area under buildings or paved over, there is clearly less space for wildlife in Glenfield than in rural parishes. However, the surviving farmland, Rothley Brook, a few pockets of woodland, and the many hectares of gardens, together with the important open spaces managed with biodiversity in mind, under Glenfield Parish Council's strategic stewardship, means that there is still a natural environment to be protected, albeit almost entirely in semi-natural, managed habitats. The value of such semi-natural 'wild spaces' (including in urban, suburban and commercial areas) for mitigating further local and national biodiversity loss (a reality recognised in current and draft UK environmental plans) is considerable, however.

Glenfield has a variety of habitats: among others, watercourses, ponds, wetland, grassland, scrubland and naturally regenerating woodland, woodpasture (parkland), and wet and dry woods, both deciduous and coniferous. Although there are no individual sites or species of national importance, biodiversity is reasonably high – especially for a suburban area – as shown by the number of species (currently well over 1000) and habitats recorded in the Leicestershire Environmental Records (LERC) and on the Leicestershire County Council-supported NatureSpot community wildlife recording site [<https://www.naturespot.org.uk>]. Glenfield Parish Council contributes towards the cost of maintaining the Glenfield pages. A number of the sites are isolated from other green spaces and such wildlife corridors as remain are essential to prevent local extinctions and new links will be encouraged wherever possible.

It is clear that the former Western Park Golf Course, site OS08 is the biggest site in Glenfield that is described by these paragraphs. It is unfortunate that the site is owned and “managed” by Leicester City Council, rather than being under the stewardship of the Parish Council, who are minded to protect natural assets.

Page 32 of the Glenfield Neighbourhood Plan states:

Local Green Spaces

Of the 44 inventoried open spaces, two score 72% or more of the maximum possible (18/25 - the locally agreed appropriate threshold) and meet the essential requirements for designation as Local Green Space as outlined in the National Planning Policy Framework (NPPF 2021, paragraph 101). The evidence base for

the resulting designations is in Appendix 4. Statutory protection of these sites will ensure that these most important places in Glenfield's natural and human environment are protected for future generations. These sites are currently classified as 'Green Wedges' in the Blaby Core Strategy. However, this policy is under review through the new Local Plan with the expectation that the further development required in Glenfield will result in the deletion of the Green Wedge Policy.

POLICY ENV 1: LOCAL GREEN SPACES - Development proposals that would result in the loss of, or have an adverse effect on, the following Local Green Spaces (details Appendix 4; map figure 7 will not be supported other than in very special circumstances.

St Peter's Churchyard, Glenfield (Inventory reference OS23); area 0.27 ha

Blackthorn Green and Fishley Belt (OS08); area 17.8 ha

It is reassuring that the council acknowledges the former Western Park Golf Course, site OS08 as meeting the threshold for a Local Green Space. It is almost 66 times the size of St Peter's Churchyard, the only other designated Local Green Space. I'll say that again. **66 times the size**. This is clearly a significantly important site, which satisfies all four of the strategic functions of a green wedge stated in the recent Leicester City Local Plan and therefore should be protected as such, not decimated.

It is therefore essential that Glenfield Parish Council and Blaby District Council continue to designate this area as green wedge within the Local Plan.

Page 34 of the Glenfield Neighbourhood Plan speaks of the poor air quality in the Glenfield area.

Air Quality and Pollution

A main contributor to the pollution in the air locally is the M1 Motorway. Traffic frequently queues as it passes by Glenfield and especially by junction 21 and 21A, the junction of the A46 with the M1. The prevailing winds bring these noxious fumes and particulates into Glenfield giving unacceptably poor air quality. Glenfield is effectively boxed in between the Leicester City, the M1 and the A46 and A50 busy trunk roads.

and

At a local level the Parish Council will encourage the planting of trees to capture some of this particulate matter and will support the endeavours of the Highways Agency in improving traffic flow along the motorway. The layout of Stamford Street however does not provide any possible location for such mitigation, although the Parish Council has planted some evergreen shrubs on the island itself.

and

POLICY ENV 2: AIR QUALITY - Planning decisions should take account of the impact on air quality in the Plan Area, supporting proposals which will result in the improvement of air quality or minimise reliance upon less sustainable forms of transport.

Whilst the planting of trees and evergreen shrubs around the village is admirable, there are far more mature trees and bushes on the former Western Park Golf Course, site OS08, than the Parish Council could ever hope to plant around the village. It is already there as a biological asset, reducing pollution and CO₂. If this site were to be developed, the Parish Council would not be able to mitigate the effects on the village. The developer, could not mitigate the effects either and air quality would reduce further, leading to more chronic illnesses, and premature deaths.

Pages 34 and 35 of the Glenfield Neighbourhood Plan speak of important open spaces.

POLICY ENV 3: IMPORTANT OPEN SPACES

The following open spaces in Glenfield (figure 8) are of high value for one or more of sport, recreation, beauty, amenity, tranquillity, and community led biodiversity enhancement, or as green spaces within or close to residential areas. Development proposals that result in their loss, or have a significant adverse effect on them, will not be supported unless the open space is replaced by equivalent or better provision of its valued features in an equally suitable location, or unless the open space is no longer required by the community.

Blackthorn Green* and Fishley Belt (OS 08), Glenfield Parish Council* and Leicester City Council; accessible open space, natural greenspace

The former Western Park Golf Course, site OS08, is clearly an important open space as described. The phrase “*Development proposals that result in their loss, or have a significant adverse effect on them, will not be supported unless the open space is replaced by equivalent or better provision of its valued features in an equally suitable location, or unless the open space is no longer required by the community.*” is reassuring, providing the Councils can honour this pledge. The open space is clearly needed by the community, not just as an open space for recreation, but also as a green lung for Glenfield. I do not see how it is feasible for any developer to replace this with an equivalent or better provision of its valued features, which would be open space for walking/recreation, “nature bathing”, biodiversity, education green lung and flood protection. This policy must be strongly upheld in the context of this site.

Pages 37 to 39 of the Glenfield Neighbourhood Plan speak of site of natural environment significance and biodiversity.

POLICY ENV 4: SITES OF NATURAL ENVIRONMENT SIGNIFICANCE – The sites mapped here (figure 9) have been identified as being of at least local significance for their natural environment features. They are ecologically important in their own right and are locally valued. If significant harm to biodiversity cannot be avoided (through locating to an alternative site with less harmful impacts), adequately mitigated, or compensated for, planning permission should be refused in conformity with paragraph 180a of the National Planning Policy Framework. Proposals going forward should plan for and deliver a biodiversity net gain of 20% (on-site wherever possible) through the mechanisms described in the Environment Act 2021.

POLICY ENV 5: BIODIVERSITY – All new development proposals will be required to safeguard habitats and species, including those of local significance, by planning for and delivering a biodiversity net gain of 20% (on-site wherever possible) through the mechanisms described in the Environment Act 2021. If significant harm to biodiversity cannot be avoided (through locating to an alternative site with less harmful impacts), adequately mitigated, or compensated for, planning permission should be refused in conformity with paragraph 180a of the National Planning Policy Framework.

It is impossible to comprehend how significant development of the former Western Park Golf Course, site OS08, will support the maintenance and enhancement of biodiversity, never mind delivery of Biodiversity Net Gain; it simply cannot. The destruction of a significant portion of land will significantly reduce biodiversity in the area. Even if any development were to dedicate some land to “open space” it will in no way mitigate the biodiversity destruction of the development. Invertebrates in particular are a significantly important part of the food chain and biodiversity network. Building on top of this semi wild area, will completely destroy a vast proportion of the invertebrate life and therefore impact the animals and birds which rely upon them as a food source. There is no way that Biodiversity Net Gain can be achieved by developing the land for housing and industrial use, as proposed by Leicester City Council. This policy must be strongly upheld in the context of this site.

Page 41 of the Glenfield Neighbourhood Plan speaks of an area of separation, which is the whole of site OS08.

POLICY ENV 7: AREA OF SEPARATION To prevent further physical and visual coalescence of the City of Leicester with south Glenfield, the area identified in figure 11 is designated as an Area of Separation. Development proposals in this area will only be supported if they are located and designed, to maintain or where possible enhance the area’s ‘open countryside’ character and its recreational and ecological value.

It is clear that the development proposed by Leicester City Council for housing, industrial units, traveller pitches and waste recycling site is not going to “enhance the

area's 'open countryside' character and its recreational and ecological value" and therefore this policy must be strongly upheld in the context of this site.

Page 50 of the Glenfield Neighbourhood Plan speaks of flood risk resilience

POLICY CC1: FLOOD RISK RESILIENCE – Development proposals in flood risk zones 2 and 3 and within the areas of surface water flood risk indicated in Figure 18 will be required, where appropriate, to demonstrate that the benefit of development outweighs the harm in relation to its adverse impact on national flood resilience strategies or on national and Blaby District Council climate change targets, and that it will not conflict with locally applicable flood resilience strategies and mitigation infrastructure.

Whilst measures to protect flood risk resilience in the marked zones is essential, the flood protection measures already afforded by the former Western Park Golf Course, site OS08, have been overlooked.

The whole 52.1ha site absorbs a significant amount of rainwater that would otherwise flow into neighbouring areas. To put this into context, 2mm of rain falling on the site could result in 1,042,000 litres of rainwater being absorbed by the natural environment, rather than flowing off into Glenfield, Rothley Brook and the Scudamore Road industrial estate. This rainfall could easily occur in a 1 hour period. The average rainfall for Leicester is quoted as 620.2mm per year. This equates to an eye watering 323 million litres of water falling on the 52.1 hectare site or **110 million litres of water on site OS08**. After heavy rain, it is clear that the site holds back the water as the ground can be boggy in places – it is already doing its job in managing the flood risk in the area. The drainage infrastructure and Rothley Brook cannot cope with this volume of run off if the site were to be developed. This would result in more frequent, more extensive flooding in the village around The Forge, Barrows Lane, The Maltings etc. and onto Station Road properties. It is therefore essential that the Councils oppose any development on this site by Leicester City Council as the impact on the residents of Glenfield will be immeasurable.

Page 65 of the Glenfield Neighbourhood Plan speaks of walking for recreation and amenity

POLICY CF 7: WALKING FOR RECREATION AND AMENITY – Development proposals that result in the loss of, or have significant adverse effects on, the existing composite network of walking routes (Figure 20) will not be supported without appropriate mitigation. Development proposals which, where practicable, include walking routes that link into the existing network and/or with community amenities and services, particularly including local school(s) will be supported.

It is clear that the coronavirus pandemic reminded us of the importance of walking, of getting out into nature and the associated health benefits of doing so. Walking in a green, open space, surrounded by nature is proven to reduce stress levels, reduce

anxiety and depression and can help to ease the symptoms of a number of physical conditions too and is far better than walking around an urban area with only houses and tarmac to see. Any development on this site will reduce the quality of the impact of the current walking routes (formalised routes and informal) in the area.

Page 65 of the Glenfield Neighbourhood Plan addresses traffic management and in particular:

POLICY T1: TRAFFIC MANAGEMENT - With particular regard to the highway network of the Parish and the need to minimise any increase in vehicular traffic all development must:

- a) *Demonstrate that the cumulative impact on traffic flows on the strategic and local highway network, including the roads within and leading to the village centre, will not be severe, unless appropriate mitigation measures are undertaken where feasible;*
- b) *Be designed to minimise additional traffic generation and movement;*

Leicester City Council's Local Plan does not give any insight as to how vehicles (domestic, commercial and industrial) will access and egress the site once developed. It is clear that certain amenity sites within Glenfield, such as the Morrisons supermarket, library, pubs/restaurants, hairdressers etc. will be attractive destinations to those living and working on that site, if developed. There will undoubtedly be further traffic along Kirby Road, where there have already been a number of accidents and near misses. The narrowing of the road between the Forge and Elm Tree Avenue is a pinch point if two large vehicles meet. There is already congestion at peak times along Station Road travelling towards the A50 and this is only likely to get worse the more demand there is on the local highway infrastructure. It is not clear where the plan hopes to mitigate to negative effects of increased traffic flows should it not be feasible to undertake appropriate mitigation measures (paragraph a), above).

The Glenfield Neighbourhood Plan contains a number of admirable features that should support the biggest area of green space to remain that way. However, it will be difficult to resist the dominance of Leicester City Council as landowner and significantly bigger authority in it dogged determination to destroy a valued area of land, important in so many ways (not just sentimentally), to the significant detriment of neighbouring city and county residents, but also county residents further into the village in terms of health, wellbeing, pollution and poor air quality, flood risk, biodiversity loss to name but a few. This is not some sterile piece of farmland or brownfield space, this an area designated as green wedge by both councils and must therefore be protected.

R028:

Following the publication of the Neighbourhood Plan, I am writing to express my support for keeping the part of the former Western Park Golf course that is in Blaby

(OS08) as an official Local Green Space, protected from any development. This area of land provides a considerable amount of value to local people, it plays a role in reducing the effects of climate change and air pollution and it would, therefore, be a real tragedy if it were to be built upon. I was extremely disappointed to read in the Leicester City Draft Local Plan (para 4.24) that both Leicester City Council and Blaby District Council plan to work together to build on both the Leicester City and Blaby sections of the former Western Park Golf Course.

Page 54 of the Neighbourhood Plan mentions the Localism Act 2011, which regards an "Asset of Community Value" as being land as well as a building. Given that the act mentions 'land', it is clear that the Blaby section of the former Western Golf Course should be seen as an Asset of Community Value. It is disappointing that Policy CF1, outlined on page 54 of the Neighbourhood Plan, only mentions buildings and omits land, whilst Policy CF2, on page 55, fails to mention open spaces as a community facility. Page 64 states that there is a lot of support for more land to be used as a cemetery; however, I definitely do not feel that using the former Western Golf Course for this purpose would be reasonable.

I also wish to mention that there are two sites of local historic environment significance on the Blaby part of the former Western Park Golf Course, which are listed on page 43. These are MLE 122 (presumed) mediaeval fishponds and MLE 7701 Roman occupation site. It is important, therefore, that these sites are not disturbed by development.

The two paragraphs under the heading 'Natural environment' on page 31 of the Neighbourhood Plan are very good, as they mention the importance of preserving the natural environment in Glenfield. In order to properly safeguard the natural environment in Glenfield, it is vital that Blaby District Council and Glenfield Parish Council do not build upon the Blaby section of the former Western Park Golf course.

Air quality is a concern in Glenfield, as mentioned on page 33 of the Neighbourhood Plan. If the proposed development on the Blaby part (and Leicester City part) of the former Western Park Golf Course goes ahead, this will only increase the problem of air pollution further.

Policy Env 4 on page 37 of the Neighbourhood Plan is important, as it mentions that the sites stated in figure 9 on page 38, which include the Blaby section of the former Western Park Golf course (OS08), need to have a 20% biodiversity net gain (ideally on site), if any development on them takes place. Because of the biodiversity on OS08, it's very difficult to see how, if the proposed development on the site goes ahead, this can be achieved on site. And I would not support any proposal that would increase the biodiversity of another site if it means that the Blaby part of the former Western Park Golf Course is simultaneously built on. Of course, I support the increasing of the biodiversity of as many sites as possible.

Policy Env 7 on page 41 of the Neighbourhood Plan is extremely important, I feel, as it states that the Blaby part of the former Western Park Golf Course is an Area of Separation in that it separates the City of Leicester from south Glenfield. It is very difficult to see how the current proposals for development on the OS08 site comply with Policy Env 7 in any way. The only way that Policy Env 7 can realistically be implemented is through dropping the proposals to build on the site completely, including the building of any new access routes from Blaby to the Leicester City section.

Climate change is a huge concern, and we do need to be taking the threat posed by it very seriously. (Climate change is mentioned on page 48 of the Neighbourhood Plan). One way that we can reduce CO2 emissions is to plant more trees, in addition to keeping the ones that we already have. The Blaby section of the former Western Park Golf course is an ideal site for planting more trees. These new trees, combined with the trees already on the site, will also help with reducing air pollution in the area. If we are serious about mitigating the effects of climate change, as well as reducing air pollution, building on the Blaby section of the former Western Park Golf course makes no sense whatsoever. (This also applies to the Leicester City part of the site.)

Policy CF 7 (page 65 of the Neighbourhood Plan) mentions walking routes. If the Blaby part of the former Western Park Golf Course were to be built on, this would result in a huge loss of space for walking and other exercise. Given that walking and other forms of exercise benefit people's mental and physical health, it would not make any sense, therefore, to build on the site.

In my view, it is clear that the proposed development on the Blaby section of the former Western Park Golf Course is not supported by numerous parts of the Neighbourhood Plan, as I have explained above, and is not supported by local residents either. This proposed development should, therefore, be dropped. Instead of being built on, the Blaby section of the former Western Park Golf Course should be rewilded and remain as an official Local Green Space for local residents to enjoy.

Thank you for your consideration of my comments.

R029:

I write to comment on the Glenfield Neighbourhood Plan that has been submitted to you by Glenfield Parish Council to undertake a formal consultation under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

I think it is an excellent document and captures all of the aspects that I had hoped for. I have picked out some of the key ones I particularly agree with.

Section 3, community engagement. I feel that the production of the plan has very much taken into account the views of Glenfield residents, and so where the Leicester Local Plan, I think, pretends to have taken views into account, the Glenfield plan

definitely has. Residents, including myself, were able to ask questions and make comments about the draft plan, and I feel these have been listened to.

I completely agree with the vision for Glenfield (section 4). It is very forward thinking - the section on home working (point 5) is an example of this. Covid showed many people that home working was possible and many found it beneficial. I think the future will contain much more home / hybrid working arrangements and so anything to support that will be excellent.

Where development within Glenfield is concerned I don't think that there is a case of NIMBYism - there have been large new developments of factories, warehouses and homes on Kirby Road that have been accepted by local residents. But too much more development will run the risk of merging Glenfield into Leicester and / or Groby completely. I accept that there may have to be some new housing within Glenfield. But directing and controlling that development through the plan, should be the goal. And to that end it is really good to see the proposals to make "our" section of the old Western Park golf course (site OS08) a designated local green space and an area of separation. (Policies ENV1 and ENV 7), as well as the proposal regarding maintaining Rothley Brook Green Wedge (Policy ENV 6) and the other "smaller" areas of important open spaces (Policy ENV 3). I made a strong objection to the Leicester City draft plan against developing the golf course. However, it seems a strong possibility that the Leicester City Council will get their way and develop the old golf course. Their plan is to include site OS08 in Glenfield within the developed area but it is imperative that Blaby District Council resist that. Retaining the site OS08 will provide a still significant area of green space for Glenfield residents to enjoy and will also maintain the extensive biodiversity of the site.

On the subject of Biodiversity it is pleasing to see a policy supporting this (Policy ENV5) and that the policy advocates a biodiversity net gain of 20% for any development. This is double what the Leicester plan aims for.

A better supply of smaller homes to allow older residents to downsize within Glenfield, and people to get onto the property ladder more easily, is an excellent aim. (Policy H2)

I was very pleased to see electric vehicle (EV) charging being made a priority, as clearly electric vehicles are the future. Glenfield getting ahead of the game in this area would be excellent. (Policy CC3). The policy covers providing charging points both within new properties and within the community for general use. I think that currently the biggest inhibitor of electric vehicle uptake is the relative lack of accessible community charging facilities. Obviously petrol forecourts are everywhere, and we need the same level of accessible EV charging points.

And that leads into the wider subject of climate change and the environment, where the sections regarding flood resilience and energy efficiency of new buildings are

excellent. (Policies CC1 and CC2). Alongside the earlier sections about green spaces and biodiversity - keeping our green spaces is so crucial.

R030:

With Ref to: Leicester Local Plan 4.24

Good Morning,

I write to express my great concerns over the plans to develop the former Western Golf Course.

You will be well aware of the already prolific developments within, and just on the border of, this parish in recent times. The area is being 'strangled'.

Of course, other areas of the city and county too, have seen industrial, commercial and domestic dwellings developed but, I would argue that Glenfield and its nearest environs, have had more than its fair share of loss of open/green spaces. In addition of course, very close to the former golf course site, we have the country's busiest arterial road – the M1. Also the very busy A46.

Please let us retain a significant 'breathing' space for both the local populace and wild life.

With the latter in mind. I was dismayed to learn whilst watching Sir David Attenborough's new series, Wild Isle's, this country is one of the most nature depleted ones on the planet! This western side of Leicester/Leicestershire has certainly contributed to that, sadly!

Of course, there is a need for new homes. Again, however, I believe we have already shown enough to meet our commitments in the area in recent times.

I believe it would also help to meet the need for new homes if our bigger, more powerful neighbour, Leicester City Council, made better use of their brown field sites. I tire of reading yet more such sites given over to develop *still more* student accommodation. Perhaps argue this point with them as firmly as possible.

I, and of course many others, sincerely hope you will consider leaving the section of the old golf course that falls under Blaby, left as is.

R031:

I am 20 years old and have lived in Glenfield all my life. I love nature and the outdoors, and I am really concerned that the former Western Park Golf course is being considered for housing development.

Glenfield doesn't have many good walks, unlike many surrounding villages, and we cannot afford to lose this green space which provides residents with access to nature, and the opportunity to stay healthy through walking and breathing clean air.

As a young Glenfield resident, I hope to continue to use this green space for many years to come.

I strongly object to the plan to develop this area - it should remain a green space, for the wellbeing of the locals and also the natural habitat of many species.

R032:

I am very concerned about the possible development of the former Western Park Golf Course, as this is an important green space which is used by many local people for walking and enjoying the benefits of nature.

At a time when obesity and mental health issues are costing the NHS millions, it doesn't make sense to develop a green space which is well used by locals to keep fit through walking and jogging, and also to stay mentally well through accessing nature.

This area must remain a green space - I strongly object to the plan for development of new homes on this site.

R033:

As a Glenfield resident, I would like to express my concern regarding the potential development of the former Western Park Golf Course. This is an important green space which allows local people to access nature and clean air, providing an opportunity to keep fit and healthy through walking, jogging and exercise. Also, access to green spaces is proven to support mental wellbeing, which is an area of medicine with increasing cost to the NHS. If the former Western Park Golf course is built on, it will be to the detrimental physical and mental wellbeing of Glenfield residents and the wider population who use this space. I strongly object to the plan to develop this area and believe that it should remain a green space, accessible to all.

R034:

We are writing to ask that the green space we call Western Park Golf Course to be kept as it is and be repurposed as a Country Park for the use and enjoyment of all the residents surrounding this beautiful area. The mature trees and hedgerows should stop any building plans never mind all the animals, birds, insects, frogs, newts, butterflies and many more call this sight HOME!!

It is not ours to destroy but to preserve and keep forever as a gift for future generations to come.

They will say thankyou for the foresight not to build over this beautiful haven.

Thankyou. Save our green space. Please.

R035:

I fully support the many green space and biodiversity aspects of the Glenfield Neighbourhood Plan. As well as supporting wildlife, these open spaces have a vital role with regards to air quality, climate change and wellbeing.

The ceaseless threat of development on to our remaining open spaces must be rigorously defended. The major green space within Glenfield is the former Western Park Golf Course and this is listed as a Local Green Space in the Glenfield Neighbourhood Plan.

This popular local space serves numerous functions. Not only is it an area of great biodiversity, it is also a contributor of better air quality and also serves as an important separation of settlements. Furthermore, the former golf course delivers a vital contribution towards recreation and wellbeing.

The threat of Leicester City expanding over the golf course is significant and I urge Blaby to strongly resist any encroachment into the Blaby section.

It is extremely probable that City will be seeking additional highways access on to the site in Blaby controlled areas. These access points will not only be from the Ratby roundabout (as mentioned in the City Local Plan supporting documents) but also potentially from the Elm Tree Farm estate. The repercussions from the increased traffic flows will have a large impact across the Glenfield area. This will cause more traffic congestion, more noise, and a further increase in air pollution.

I strongly agree with the following statements:

page 9.

“To safeguard existing open space for the enjoyment of residents”

“To protect important open spaces from development”

“To protect and, where possible, improve biodiversity and important habitats”

page 16

1. “Locally important open spaces, biodiversity and amenities are to be protected and enhanced wherever possible. It seeks to balance any requirement for appropriate development against the value of environmental features that are both special in their own right and as community assets and significant for their wildlife and history of the community., in keeping with the Parish Council being an exemplar for its approach to improving biodiversity.”

“Working together to reduce the levels of particulates, CO2 and other noxious emissions will help mitigate the impact of climate change.”

The section titled Natural Environment on page 31 strongly supports biodiversity and the Blaby section of the form Western Park Golf Course, as the largest area, offers the greatest opportunity.

Page 32 Local Green Spaces.

It is vital that the two listed Local Green Spaces including OS08 are afforded protection against development.

Air Quality and Pollution Page 33

If the additional highways access required for the former Western Park Golf Course is given approval, this will fundamentally have a negative impact on the area. Leicester City’s Local Plan cites the Ratby roundabout as one of the additional highways access points. The increase in vehicle movements through Glenfield and surrounding areas will certainly degrade our air quality even further and add further congestion to the already busy local road network. Furthermore, if additional highways access to the golf course is secured from the Elmtree Avenue estate in Glenfield. This will have a huge impact for the aforementioned reasons.

Leicester City's Local Plan Regulation 19 also added a Household Waste Recycling Plan to the former Western Park Golf Course site. With prevailing south westerly winds, this will also have an impact on Glenfield air pollution as well as another unwelcome increase in vehicle movements.

Important Open Spaces page 33

I strongly support the preservation and protection of all the Glenfield open spaces.

Sites of Natural Environment Significance page 37 and Biodiversity page 38

The Fishley Belt area has a TPO order and several ponds with recorded Great Crested Newt populations. GCN populations confirmed in surveys in 2013 and 2014. Copies of these surveys are available from Leicester City Planning.

Area of Separation page 41

I strongly support this paragraph for all the reasons stated. Any development that occurs on the former Western Park Golf Course within the City boundary will exceedingly increase the importance of retaining the Blaby section as an area of separation.

Sites of Historic Environment Significance page 42 & 43

Features MLE122 and MLE7701 require protection from any development.

Climate Change and Flood Risk page 48

I strongly support these paragraphs. The Blaby section of the former Western Park Golf Course offers by tree planting, a great opportunity for carbon capture. It should also be noted that the golf course is predominantly clay which absorbs huge amounts of rainfall. During its years as an operating golf course, it was often closed to golf after periods of heavy rain due to being waterlogged. The land comprising the golf course is of higher elevation than the surrounding Glenfield residential areas and there is the possibility that development and associated run off could cause local flooding.

Community Facilities, Health and Wellbeing page 54 and 55

"The Localism Act 2011 defines an "Asset of Community Value" as "a building or other land (whose) main use has recently been or is presently used to further the social well-being or social interests of the local community and could do so in the future".

This section of the Glenfield Neighbourhood Plan seems to focus only on buildings as "Assets of Community Value" but I would argue that the local open spaces are of equal if not of greater value.

Cemetery page 64

I would not support a cemetery on any of Glenfields open spaces including the former Western Park Golf Course, site OS08.

Walking for Recreation and Amenity Page 65

I support the retention of all the Glenfield walking paths and the creation of additional paths. The former Western Park Golf Course site OS08 has official walking paths and additional public rights of way are currently in process with County Hall. Refer to: Definitive Map Modification Order Application: M1228 - Western Park Golf Course

Finally, I would like to thank Councillor Roy Denney for creating the Glenfield Neighbourhood Plan.

Please keep me informed on the outcome of the plan.

C010:Natural England:

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.

Natural England does not have any specific comments on this draft neighbourhood plan.

However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.

General Comments

Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities

Natural environment information sources

The Magic website (<http://magic.defra.gov.uk/>) will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: **Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)**. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available here: <http://www.nbn-nfbr.org.uk/nfbr.php>

Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found [here](#):

<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

. Most of these will be mapped either as **Sites of Special Scientific Interest**, on the Magic website or as **Local Wildlife Sites**. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.

National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found [here](#):

<https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

There may also be a local **landscape character assessment** covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.

If your neighbourhood planning area is within or adjacent to a **National Park** or **Area of Outstanding Natural Beauty** (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.

General mapped information on **soil types** and **Agricultural Land Classification** is available (under 'landscape') on the Magic website (<http://magic.defra.gov.uk/>) and also from the LandIS website (<http://www.landis.org.uk/index.cfm>), which contains more information about obtaining soil data.

Natural environment issues to consider

The National Planning Policy Framework sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance (<http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>) sets out supporting guidance.

Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.

Landscape

Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.

If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.

Wildlife habitats

Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here:

<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity>, such as Sites of Special Scientific Interest or **Ancient woodland**(<https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences>). If there are likely to be any adverse impacts, you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.

Priority and protected species

You'll also want to consider whether any proposals might affect priority species (listed here

<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimport>

[ance.aspx](#)) or protected species. To help you do this, Natural England has produced advice [here: \(https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals\)](https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals)

to help understand the impact of particular developments on protected species.

Best and Most Versatile Agricultural Land

Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 171. For more information, see our publication Agricultural Land Classification: protecting the best and most versatile agricultural land (<http://publications.naturalengland.org.uk/publication/35012>).

Improving your natural environment

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

C011: Groby Parish Council:

In response to the current Glenfield Neighbourhood Plan Public Consultation, Groby Parish Council would like to submit the following observations:

1. Although the Groby Parish Neighbourhood Plan may only make policies concerning the area within the parish boundary, Groby Parish Council is aware of the importance of those areas abutting the Parish both for context and for impact of any development on the Parish. The future prosperity and development of our neighbourhood will depend to a large extent on what happens beyond our neighbourhood area. There needs to be an understanding of the wider context for a neighbourhood plan to be realistic and deliverable.

Groby Parish Council, through its Neighbourhood Plan Steering Group (GPNPSG), will continue to be alert to the relevant activities of the neighbouring Parishes/Districts including Glenfield/Blaby and is prepared to work closely with those neighbours on issues of mutual concern.

2. We are satisfied that the current draft of the Plan has addressed our previous concerns about representation of residents of The Brantings. Although distant from

Glenfield centre, most of the houses in this settlement are in Glenfield Parish with just a small enclave of houses in Groby Parish (3-35 Border Close). Only the Glenfield Plan may make policies for the part of the Brantings that lies in Glenfield Parish.

3. We are satisfied that the current draft of the Plan has corrected the depiction of the Rothley Brook Meadow Green Wedge.

4. We note that the current draft of the Plan presents a robust defence of the Rothley Brook Meadow Green Wedge which is to the mutual benefit of both Glenfield and Groby Parishes.

5. We are concerned that the current draft of the Plan refers to expected 'deletion of the Green Wedge Policy' (by Blaby District Council). It is essential that this narrow wedge is maintained in both Glenfield and Groby Parishes to help maintain settlement identity and to provide a green lung and a recreational resource. The green wedge is most effective when considered as a whole. Any change to the green wedge in Glenfield Parish will impact Groby Parish and vice versa. GPNPSG will monitor related policy development very closely.

6. The current draft of the Plan does not identify any sites for development, but we note that Blaby District Council's Delivery DPD allocates land to accommodate a minimum of 37 homes within Glenfield up to 2029.

Sites are not identified for development because at the time of preparing the Plan, Blaby District Council could not confirm the housing requirement for Glenfield as the preparation of the new Local Plan was not sufficiently advanced. The District Council anticipates around 339 new dwellings will be required in Glenfield over the life of the new Local Plan. We note that Glenfield Parish Council has committed to review the Plan once residential requirements are clearer. The GPNPSG will remain vigilant and review any revisions of the Glenfield Neighbourhood Plan when they become available for consultation. Any residential development in Glenfield has potential for significant impact on Groby Parish through increased use of facilities and services in Groby and the concomitant increase in traffic.

7. We commend the Glenfield Neighbourhood Plan Steering Group for their treatment of biodiversity and climate change in the Plan and congratulate them on meeting this important milestone in development of the Plan.

8. Any development within the area's bordering Groby would increase pressure on Groby Parish's primary schools, traffic, and other services, all of which are already overstretched.

R036:

I am writing to express my dismay at the thought of concreting over a beloved and breathtakingly beautiful area of Leicester. A home to much wildlife, enjoyed by all residents, a gift to future generations. Glenfield has had much of its green spaces built on. The traffic is already horrendous. No places at the dentist, schools, doctors. There are many more sites that are available, new parks boulevard has a huge grass lawn nobody uses. Western park has a huge grass field nobody uses. Please turn the golf course into a wildlife sanctuary that people can enjoy. Many in Leicester do not even know it is here. Leicester used to be the environment city, we are supposed to be green.

R037:

Having watched David Attenborough Save our Wild Isles, and he stated that the UK is one of the most nature depleted countries in the world.

The Old Western Golf Course is now a beautiful wild life haven, and to build on this land is an absolute disgrace, I strongly object against any development on this wonderful and tranquil land.

It's stated in the local plan to safeguard existing open space for the enjoyment of residents, I walk on the golf course every day unless it's raining heavy with my friend and our dogs, I find this as my time, as I'm a full time carer for my husband who has dementia, and if it wasn't for this I'm not sure how I would cope, there isn't anywhere like this within walking distance, and I can't go to far from home due to my husband.

The other point being would be all the extra traffic, Scudamore Road is bad enough now with all the lorries and work traffic and air pollution as the M1 and A46 isn't to far away, and with all this nature especially the thousands of trees on the course, how would that effect the air quality and pollution then, I dread to think.

I'm not going to say any more, just that this beautiful surroundings with all the wildlife that my friend and I and hundreds of others that use the golf course should not be built on, so please please leave it alone for all the local residents who live locally.

R038:

I wish to comment on the above plan.

Under no circumstances should there be any development on the old Western Park Course.(OS08) This portion of land is an asset of community value as defined on page 54 of the plan.

It provides recreation facilities for a large number of Glenfield and other residents, as well as being home to large numbers and species of wild life, trees and other vegetation. It is the only local green space available to a large number of residents.

R039:

I would like to comment on the plan to develop Western Park Golf Course OS08.

This parkland is an essential natural open space needed by the local community for recreational purposes, wellness and activities.

This natural parkland is home to badgers, foxes, newts, owls, buzzards and bats to name just a few species of wildlife.

It is also an essential part of Glenfield's natural soak away and development of this beautiful piece of natural habitat will impair Glenfield which already struggles with flooding problems.

R040:

We would like to register our opposition to any more houses being built in the Gynsill Lane area.

There is already a proposed plan to build 350 new houses on the pasture land adjacent to Gynsill Lane with an access road onto Gynsill Lane. This would add about another 700 vehicles to the local traffic which is already at capacity at the busy times of morning and evening rush hours. Air pollution is already a problem.

Green spaces that are so important for our well being, for wildlife habitats and biodiversity are disappearing fast. If any more are lost they will have virtually gone completely in this area.

We appreciate that extra housing is needed but building on green wedges will just result in a homogeneous sprawl which will in turn affect the character of the village.

We fully concur with Councillor Denny and share his concerns.

R041:

I would like it noted that I completely support the majority of the Glenfield Neighbourhood Plan and would like to register my gratitude for the time and effort spent by those concerned in preparing this in order that Glenfield might preserve its character and secure a future that improves and enhances it further.

My only exception to this relates to the former **Western Park Golf Course**. I do feel that, to be consistent with much of the philosophy and many of the stated objectives therein, the Plan could (and maybe should) be rather more protective of the former **Western Park Golf Course**.

Much of what follows will already be well-known to yourselves, but it concerns me that there appears to be much pressure from outside the Parish to meet targets (is the Government's 300k houses pa still mandatory or is it now Advisory?) and the Course is a favoured solution because it's an easy one, at a time when it may be easy but is not right for so many reasons, and green areas, and time to save them, is running out.

Green Wedges/Green Belts

My understanding is that protections applicable to Green Belt areas also apply to designated Green Wedges

National Planning Policy Framework

'Para137 The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.

Para 138 Green Belt serves five purposes:

- a) to check the unrestricted sprawl of large built-up areas;
- b) to prevent neighbouring towns merging into one another;
- c) to assist in safeguarding the countryside from encroachment;
- d) to preserve the setting and special character of historic towns; and
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.'

Para 149 states that some types of development on Green Wedges MAY be considered, NONE of which includes waste recycling centres, gypsy/traveller sites , or indeed, houses or commercial buildings except for 'limited affordable housing'

Community Identity

This green space is important as a separator from the ever-growing Leicester conurbation and in so doing, helps to maintain a sense of identity for those in the village. Identity

reinforces feelings of belonging and communal ownership, which helps to generate pride in their surroundings and has a positive impact on well-being.

The loss of this site would remove a significant separator for Glenfield

Environmental

Emissions and the Climate Crisis

Currently, mature tree cover is a significant proportion of the site, providing both CO₂ absorption and shade. The development of housing and commercial buildings would not only remove these benefits but ADD to emissions, for as long as building regulations do NOT make it a mandatory requirement for new builds to be efficient to a zero-emissions standard. And this is before taking into account the substantial emissions resulting from the development process itself throughout its life-cycle.

Biodiversity

In September 2020 the Natural History Museum in collaboration with the RSPB produced a study, giving countries a **Biodiversity Intactness Index** as a measure of how much biodiversity they had retained. On a scale of 1-240 (lowest to highest) the UK scored **12** (50%) overall, and England itself scored **7** (47%). Below are two extracts:

1. 'The UK only has half of its natural biodiversity left.'
2. When compared to the G7 countries, this puts the UK at the very bottom in terms of how much biodiversity still survives. When compared across all countries in the European Union, only Ireland and Malta come out worse, and the UK is in the bottom 10% of all countries globally.'

This Green Wedge has the strongest measured biodiversity of the sites considered in the Local Plan and is home to a wide variety of wildlife. Although mitigation is required if affected, because of the variety and quantity, it is difficult to see how this could be sourced to current levels ANYWHERE local let alone enhance it.

In the Regulation 18 consultation this site received the largest number of representations by far, of any other site, from the community.

Mitigation/Enhancement

Any trees planted, as part of replacement/mitigation proposals, will take many years to reach the size, and beneficial effect, of those existing trees destined to be cut down on this Green Wedge.

It would make more sense to supplement these mature trees by planting more trees on this green space instead of developing it, as is being proposed.

Flooding

This green space, along with the many mature trees, absorbs a considerable amount of rainfall and contributes to the reduction of flooding. Because the site is higher than most of the surrounding land the run-off from a developed site with a large proportion of non-absorbent surfaces would be considerably more than it is currently.

The air temperature in built-up areas can be several degrees higher than the surrounding countryside. In summer, surface temperatures can be a staggering 50°C hotter than the surrounding air, and that heat is transferred to the rainwater that drains into sewers, which in turn raises water temperatures as it is released into streams, rivers and lakes. This can be destructive to aquatic ecosystems, as changes in water temperature can be stressful or even fatal for marine life. (Natural History Museum website)

One of the projected consequences of climate change is more frequent extremes of climate, including heavier rain, more often, and the current drainage already struggles. We have experienced flooding on the Kirby road ALREADY since the housing developments were built there, downhill from this green space, which the SuDS failed to stop. In nearly thirty years I have never seen it flooded before.

Urban Heat Island Effect

Green Wedges spaces in cities mitigate the effects of pollution and can reduce a phenomenon known as the urban heat island effect, which refers to heat trapped in built-up areas. As climate change is expected to result in more severe and more frequent weather events this would become even more important

Air Quality/Pollution

The site is a substantial 'green lung' with few, if any emissions, other than when the grass is (unnecessarily) mowed. Its position is also strategically important, with Glenfield being boxed in by the M1, A46, A50 and the City, it creates a shield by reducing traffic fumes, particulates and noise carried by the prevailing winds. The loss of this site would remove this benefit causing any of Glenfield's efforts to counter environmental pollution by tree/shrub planting to fade into insignificance if the trees and hedges are lost to development. In addition, any development would create even more, and closer, emissions from the west to be added to and carried over Glenfield by those prevailing winds.

Emissions from initial development (both greenhouse gases and materials dust) and then subsequently from potentially non-zero-emissions standard new builds, plus additional vehicle movements both private and commercial will be enormous, negatively affecting both air quality and greenhouse gas levels for a very long time, affecting the existing community negatively, over the same period.

The latest Local Plan proposed development also includes a Household Waste Recycling centre which was not included in the 2020 consultation. In addition to the emissions from this, this type of plant is very frequently associated with persistent unpleasant smells, flies, and pollution from potential deposits runoff and/or leaching into water courses - the site is higher than much of the surrounding area and this would be a severe risk to aquatic habitat combined with increased rainwater runoff.

Not something which would enhance the environment by any stretch of the imagination, and all the more undesirable with food manufacturing downstream (Geary's Bakery).

Traffic Noise and Highways Access

The site currently generates little noise, other than that associated with a semi-wild habitat. The initial development will generate considerable noise from construction traffic for quite some time, affecting the surrounding community. Subsequently, traffic noise from the occupiers of the development will result in an increase in the surrounding area depending on the routes taken accompanied by an increase in the volumes on surrounding roads. Details of routes in and out of the proposed development are sparse, however, all of the surrounding roads are single carriageways, and most are quite narrow. Scudamore road, although wider, is effectively just as narrow because of the virtually permanent parking of vehicles (mostly HGV's) on either side of the road. They also lead on to other already busy roads and junctions which are choked well outside of the rush hours. Inevitably, more vehicles from this development would slow traffic down even more, increasing pollution, AND adding their own pollution.

Health and Well-being

Policy D: Community Facilities, health and well-being

As Land can be defined as an Asset of Community Value

"The Localism Act 2011 defines an "Asset of Community Value" as "a building or other land (whose)

main use has recently been or is presently used to further the social well-being or social interests of

the local community and could do so in the future"

Is it possible to legitimately add this site as such an asset?

Mental and Physical Health

As a semi-wild green area the site is an important place for many activities which benefit mental and physical well-being, as has been rediscovered particularly during the COVID-19 pandemic.

Green spaces are recognised as good places to get outside and walk, run, de-stress, commune with nature, or with other human beings. The list of benefits is seemingly endless, it would make more sense to promote it as a Nature Park for all of the many points above than to concrete it over.

"Insanity is doing the same thing over and over again and expecting different results."

R042:

I am writing to object to the development of western park former golf course as part of the Glenfield Neighbourhood plan. I am stunned that after all the scientific evidence and warnings that we are having about carbon emissions, global warming, climate change, the need to protect biodiversity that this is even being proposed as an idea. There comes a point when you can no longer build on everything that is green, what is even actually the point, the need for housing will be a moot point as the human race will soon die out anyway if we do not change things. The time has come to realise that we cannot just build on every bit of green space and expect to survive it. We need trees to breathe - very simple. We cut them down - we die. We need plants and insects as they are at the start of the food chain - if we obliterate all the plants and insects - we die. With so many brown site areas within Leicester that can be redeveloped for housing, the green space that is left needs to be non-negotiable - it is left alone. It should be re-wilded, encouraged to let nature flourish in attempt to save our very damaged planet.

If this golf course is developed, there will be increased air pollution - already a sore point for Glenfield being close to so many main roads due to increased emissions and the loss of trees. There will be virtually no open spaces for people to walk, exercise, children to play outside - people in the area value it so much as an open local green space to enjoy for mental and physical well being. Health will be affected in many ways in the long term if it is lost. It is an asset in its current form, way over and above any gains from it being developed. The amount of species living on the golf course, - bees, badgers, foxes, birds, newts, etc it is perfect for re-wilding, it is already doing it itself with no help or investment needed from anyone. I am not sure how anyone involved in the development plan can live with themselves to see this destroyed. When the green spaces are gone, they are gone and there is no going back from it - it is at our peril to continue in this way.

Please consider the health needs of the people already living here, the need for us to protect what little we have left of green spaces, trees and wildlife, and the need to LOWER carbon emissions not raise them. Re-wild our amazing golf course and protect our children's future.

I appreciate your serious consideration of the points made.

R043:

I would like the Glenfield Neighbourhood Plan to be considered as part of the Blaby Local Plan. I fully support the many green issues outlined in the plan. I am particularly interested in preserving and if possible extending the green spaces in Glenfield. These very important green spaces bring so many positive values like supporting wildlife and biodiversity. Additionally, the trees on these spaces make a

worthwhile contribution to carbon capture. I would like to see further tree planting. These spaces also contribute towards general wellbeing, recreation and air quality. One of the foremost and largest green spaces in Glenfield is the former Western Park Golf Course. We use this space for walking on a daily basis and we are so pleased to see so many people using it.

I recently submitted my representations on the Leicester City Local Plan and was horrified to read that they have intentions to develop over the golf course. This is a wonderful nature area and should be protected as other councils have done with former golf courses in the UK. If Leicester City do get the go ahead to build on their portion of the golf course within the City boundary, then it will be absolutely essential that Blaby do not do likewise with the section within their border.

I also noticed on the Leicester Local Plan that they mention a road access onto the golf course from the Ratby roundabout. This will inevitably bring a considerable amount of local traffic to our already busy Glenfield roads. This will also bring extra air pollution, noise and congestion to the surrounding area.

I believe what we should be doing is planting more trees on the golf course which will help with the fight against climate change. If development goes ahead on the golf course, we will actually lose a vital green space, along with more trees and so in effect there will be an unwanted contribution towards making climate change worse.

The former golf course also serves as the last remaining separation area between Glenfield and the city. It is vital that this is retained to serve this purpose as it has for decades.

I fully support all the green initiatives stated in the Glenfield Neighbourhood Plan and I absolutely do not want any of the green spaces developed, especially the former Western Park Golf Course, OS02. The golf course is the last remaining large green space in the Glenfield area and we don't want to lose it to development. I would also be against creating a cemetery on the course.

R044:

When weighing up whether or not to build on the golf course, I hope that consideration will be given to the Government's Environment Improvement Plan, published on 1st February, 2023. In summary, the Government wants every household to be within a fifteen minute walk to a park, woodland or water.

For much of Glenfield, the golf course fits that description and my neighbours and I can walk there in not much more than fifteen minutes. You might think that there are other options but that's not so. Look at a map of Glenfield. We are trapped by the city on one side and the M1, the A46 and the A50 on the others. The Ivanhoe Trail has been ruined by the noise of the traffic on the A46 and the further west you walk, by the motorway and the industrial buildings along Kirby Road.

My objections to building on the golf course also concern the dreadful state that British wildlife is in, facing habitat loss on a massive scale. By giving wildlife the space to feed, breed and thrive, we can preserve and protect it for future generations. How are we to teach young people about the natural world if they can't see it? Or hear it? In the future, why would they protect something that they have

little or no experience of? There are many brownfield sites within the city boundary. Why not build on them instead?

This is a unique opportunity to preserve a green space for human enjoyment and education while offering sanctuary to wildlife which is under threat. Please don't destroy that vision.

R045:

Dear members of the Planning Policy Committee,

I would like to offer you my comments on the Glenfield Neighbourhood Plan and the wider plans of Blaby District Council.

having read the plan I find it presents a well balanced view on the present and future needs of our community, however I do think the possible development proposals put forward by Blaby District Council and Leicester City Council regarding the former Western Park Golf course (site ref GLE031) should not be taken forward.

this site (that is part of a larger area within the city boundary) is currently designated as Green Wedge in the Blaby DC Core Strategy and I believe it's loss to development would have a huge impact on local biodiversity, air quality, and open space for our local population to enjoy.

Since the golfcourse closed in 2015 the area has undergone a great deal of re-wilding (despite the unnecessary grass mowing which takes place) and is now a haven for wildlife.

It offers a unique blend of open spaces and woodland areas not found anywhere else locally. There are already a number of Tree Protection Orders in place on the site and I would like to see this extended to include the whole area.

I also recently read with interest that Tory councillors in Leicester propose to make the ex golfcourse a nature reserve if elected..

If also represents the last real separation between any part of Glenfield and the greater urban area of Leicester City, if it is developed I feel the identity of Glenfield will be lost. The Neighbourhood Plan proposes this area (also designated OS08) be classified as Green space as outlined in NPPF para 101 if the current Green wedge status is withdrawn.

Access to any development would presumably be from the Optimus Point roundabout on Ratby Lane , this concerns me as to increased traffic flow, noise and emissions .The traffic is already heavy in this area due to commercial vehicle movements from Optimus Point, DPD and Mill Lane etc ,adding more traffic is going to impact emissions negatively.

According to the neighbourhood plan this was going to be offset by Highways England's plans to upgrade the adjacent section of the M1 to a smart motorway, which would decrease congestion and emissions... however my understanding is that all smart motorway projects are currently on hold due to safety issues.

Any housing development built there would also increase private car usage, as most employment will involve a commute by car as indeed will the "school run " .

This also leads me to question the statement that our current doctors surgeries and primary schools (and the lack of a local secondary school) etc can cope with the added population this development would deliver.

Finally, I would like to raise the issue of drainage and flood risk. The ex golfcourse often becomes waterlogged with some areas occasionally flooding. This is a very valuable water soak and if it is developed will cause additional water run-off towards lower lying parts of Glenfield and Rothley Brook both of which already have flooding issues.

I hope you find my comments constructive and will give them due consideration when deciding your plans.

R046:

The plan covers the old golf course, owned by Leicester City, but part sits within the parish of Glenfield within Blaby District. Marked as OS08 on the mapping.

This is a much valued Local Green Space. It provides a valuable Green lung as part of the Green wedge. This needs protecting in this plan as well as the emerging Blaby District local plan.

This plan defines an asset of community value and I firmly believe that the old golf course and its natural importance is such an asset.

We do not own it but it needs protecting as a Green lung. That needs to be provided by plans such as this, as well as the higher tiered Blaby District local plan.

R047:

I am writing with regards to the above plan. I am a resident of Glenfield, living on Blackthorn Road and in close proximity to one of the entrances to the Former Western Golf Course.

I note that your plan states that "Development proposals in this area will only be supported if they are located and designed, to maintain or where possible enhance the area's 'open countryside' character and its recreational and ecological value". Where I commend the plan's acknowledgement of the beautiful and historic area I would like to further urge that you do not accept any development plans for it whatsoever, regardless of any character proposed.

We are currently living in a time when we are facing global warming, a time that has been described by Sir David Attenborough as us being the last generation to be able to make a difference to the planet and the UK conservation charities calling for 'wild isles' to be saved. Amongst many other environmental calls.

The Former Western Park Golf Course is home to such a diverse range of birds, newts, rabbits, foxes, bats and badgers, I'm sure amongst many other beautiful insects and creatures, as well as fauna, flora and ancient trees. This is a space we should be preserving, re-wilding and protecting. Not developing on.

As a resident so close to this beautiful location I see so many people using this area to walk their dogs, exercise, go out as a family. I myself have two dogs who we like to walk on the golf course and my 8 year old daughter who often struggles with emotion and is currently undergoing diagnosis for ADHD finds this location a comfort, somewhere we can take her to be able to walk, run and play. She loves animals and often likes to go and see the dogs, rabbits and birds. Personally I would feel a huge loss if the area was to be develop on. I think, given it's popularity and usage, many others will too. However, the importance of preserving the habitats of the animals that live on the park should be the first and foremost importance when making any decisions. The loss of the area to development, however sensitive to open space and character would still be a huge environmental impact and a huge impact of the animals that call the location home.

I would like to thank you for taking the time to read my email and urge you to take very seriously the decision with regards to this natural beauty, once it's gone, it's gone.

R048:

I am writing this email to voice my objections to the potential redevelopment of the area of land formally known as Western Park Golf Course. After reading through the Glenfield Neighbourhood Plan for 2022-2029, I see many failings to adhere to the intentions stated. Socially, it talks about *"safeguarding existing open space for the enjoyment of residents"*, how can the destruction of one of the most beautiful pieces of green open space be classed as safeguarding? The area of the old Golf Course is highly patronized by many residents and is a place of natural beauty with abundant wildlife, not to mention its historical past. Environmentally, it makes the same statement *"To protect important open spaces from development"*, the plans which are being proposed, go completely against this. Another objective states that *"Locally important open spaces, biodiversity and amenities are to be protected and enhanced wherever possible. It seeks to balance any requirement for appropriate development against the value of environmental features that are both special and as community assets and significant for their wildlife and history of the community., in keeping with the Parish Council being an exemplar for its approach to improving biodiversity."* Another objective states *"Working together to reduce the levels of particulates, CO2 and other noxious emissions will help mitigate the impact of climate change."* How can the destruction of natural habitat and yet another increase of vehicular movements ever aim to achieve this; the fact is, it would have the complete opposite affect! In fact, the plan actual admits that *"A main contributor to the pollution in the air locally is the M1 Motorway. Traffic frequently queues as it passes by Glenfield and especially by junction 21 and 21A, the junction of the A46 with the M1. The prevailing winds bring these noxious fumes and particulates into Glenfield giving unacceptably poor air quality. Glenfield is effectively boxed in between the Leicester City, the M1 and the A46 and A50 busy trunk roads."* So please tell me how further industrial units / plants will make this better! Over the past

years, the beautiful views and countryside in our area have been consistently eradicated by industrial and housing developments. What was once a beautiful village / town, is being turned into an annex of Leicester City. Property prices have been affected by this, meaning that residents have lost money to the benefit of authorities and building companies without consideration for those who live there.

A statement made within the Objectives sections states “Older residents are occupying and heating larger homes than they need, and every effort should be made to provide small freehold properties within the community to allow them to downsize whilst staying within the village.” I find this statement disgraceful and somewhat worrying. Are they suggesting that just because people have worked hard all their lives and contributed financially to the country and can now relax and enjoy life, that they should move to a “small property”?? The last time I checked, we lived in a Democratic Country and not an Authoritarian one. Finally, another unbelievable and misconceived state made in the plan reads *“Glenfield has a number of small service industries and businesses, in a number of different locations, including Sandown Court and West Street, both off Station Road. In addition there are a large number of sizeable commercial premises in the Optimus Point and Mill Lane industrial areas with a large proportion being warehousing and distribution. While Optimus Point is a new development, other business areas suffer from poor access and infrastructure. The nature of existing employment draws workers out of Leicester and provides limited opportunities to residents and we seek to up skill the employment opportunities.”* Any community exists and evolves through a variety of residents; for many years people have travelled to their place of work, mainly due to the nature of their employment. To say we need to “upskill” residents is a complete insult to the hard-working men and women who are the backbone of the country. However, if this is the utopic plans of the ignorant, then they need to think again as the recent industrial developments and the proposed recycling plant with respect, do not / will not require a highly skilled staff. The proposed development is clearly another ill-thought-out plan to sell off land to make money for the local authorities without any thought or consideration for the local communities.

R049:

I am writing in connection with the Glenfield Neighbourhood Plan consultation.

Having read through the plan I would emphasise my support for many of the identified areas. In particular I support the social aspect of the plan. We take the opportunity to use the allotments in mill lane. This is rewarding - meeting all age groups needs and providing an environment that supports well being - physical , mental and social . One thing we have noticed is that it has become noisier ,the air quality has deteriorated due to the new traffic and also more rubbish is visible. More developments would be detrimental I think to the overall bio diversity and environmental health.

The over 60's age group who are increasing according to your document have little in general leisure facilities. The land known as the western park golf course is very

important/ we can walk to it - it provides the environmental and ecological diversity important to Glenfield. The mature trees and copses provide accommodation to the birds, there are examples of numerous wildlife there - herons, bats, buzzards, butterflies and insects. Newts and frogs. There is frog spawn in the spring. Wild flowers, fruit trees and mature oaks bring calmness to the area. There are important heritage sights that should remain and be protected.

I agree that ellis park has a lot to offer children and dog walkers and the surrounding areas are pretty.

Park house and the land around it has started to offer a social space and has been appreciated at times of celebration. It would be great if there were more community celebrations especially for the older age group.

Many of the so-called green spaces are quite small and whilst well maintained do not provide a great deal for socialising, or physical activity or wellbeing.

The area nearby to the golf course definitely does.

More developments will not help the village feel, the roads are already much busier, dangerous and traffic builds up quickly. This causes pollution and affects air quality.

I hope consideration will be given to maintain the positive aspects of village life.

C012: Blaby District Council:

Blaby District Council welcomes the opportunity to comment on the emerging Neighbourhood Plan for the Parish of Glenfield. We recognise the challenges faced in preparing a Neighbourhood Plan and appreciate the time and effort that the steering group has invested in the Neighbourhood Plan process. It is positive to see high regard given to matters such as climate change and design.

The main intentions of the plan are supported, but we have technical comments relating to whether the parts of the Plan meet the Basic Conditions. A key issue is the number of policies and the duplication with the Local Plan and within the proposed Neighbourhood Plan itself.

I have also consulted with the colleagues and in particular Development Management colleagues who have highlighted practical difficulties with some of the policies.

General Comments

The Neighbourhood Plan could be improved by:

- Including a parish-wide Policies Map and a key to the map
- The use of paragraph numbers to aid with reference to the document and relevant paragraphs.
- Improving the figures / inset maps provided in the document that are currently small and illegible. The maps must include copyright licensing statements.

Specific Comments on Neighbourhood Plan Policies

Policy H1: Settlement Boundary

The Neighbourhood Plan indicates that the boundary relating to this policy replicates the boundary identified on the Policies Map associated with the District Council's Local Plan. The policy wording does not add to the existing policy wording (Policy DM2). Whilst the District Council has no objection to the policy, it is concerned about the unnecessary duplication of policy which is contrary to paragraph 16 of the NPPF and hence not in accordance with the first basic condition. The boundary and policy H1 should be deleted.

Policy H2: Housing Mix

It appears that Policy H2 applies to all residential developments, regardless of the size of the development, i.e. from a single dwelling up to developments of over 10 dwellings. This is inconsistent with the strategic Core Strategy policy CS8 Mix of Housing.

It is noted that the policy now refers to the most up to date assessment of housing need. However, the priorities for 2 and 3 bedroomed dwellings and homes suitable for older people and those with restricted mobility should be subject to any changes highlighted by the most up to date assessment of housing need. Policy H2 should be reworded to make it fully consistent with the strategic policy CS8.

Policy H3 Windfall Housing

Elements of policy H3 duplicate other policies of the Neighbourhood Plan (H5) and policies in the Local Plan (CS10, DM1, DM8, DM13):

- Clause (a) duplicates Neighbourhood Plan policy H1, Delivery DPD DM1.
- Clause (b) duplicates the Neighbourhood Plan H2.
- Clauses (c), (f), (g) and (h) duplicates Neighbourhood Plan policy H5.
- Clause (e) duplicates Neighbourhood Plan policy TR1, Core Strategy CS10 and Delivery DPD DM8.

These elements are contrary to paragraph 16f of the NPPF and should be deleted.

In addition, clause (i) would benefit from a definition of 'tandem development' to remove ambiguity.

Policy H4: Affordable Housing

Part (a) of Policy H4 duplicates Local Plan Core Strategy Policy CS8 Mix of Housing and therefore conflicts with paragraph 16 (f) of the NPPF (2021) that states that plans should avoid the unnecessary duplication of policies. Clause (a) of Policy H4 should be deleted.

Part (b) of Policy H4 duplicates the Local Plan Core Strategy Policy CS7 Affordable Housing and therefore conflicts with paragraph 16 (f) of the NPPF (2021) that states

that plans should avoid the unnecessary duplication of policies. Clause (b) of Policy H4 should be deleted.

Part (c) of Policy H4 duplicates the Local Plan Core Strategy Policy CS7 (b) and a development's section 106 agreement. Inclusion of part c) is problematic as it may jeopardise the ability of any committed sums to be fully realised within the timeframe for spending. It is recommended that this clause is removed. The clause therefore conflicts with paragraph 16 (f) of the NPPF (2021) that states that plans should avoid the unnecessary duplication of policies. Clause (c) of Policy H4 should be deleted.

Part e) of Policy H4 seeks to prioritise the allocation of affordable housing to people with a local connection to the parish and having a similar level of need. This appears to apply to all sites whereas Policy CS7 Affordable Housing of the Local Plan Core Strategy sets out at part d) that affordable housing with a "local connection" is supported on Rural Exception Sites and not any site, given that affordable housing need is a District-wide issue and not limited to a single parish.

In practical terms, the prioritisation of affordable housing for those with a "local connection" over those with similar levels of need contradicts the District Council's Choice Based Lettings Allocations Policy (2020) ('Allocations Policy') which sets out the approach to allocating affordable housing to those with the highest priority of need and then where there is a local connection to the District (not a specific parish).

As background, Councils are required by law to have policies and procedures in place for the lettings of properties. The Council's Allocations Policy has been produced in accordance with the legal requirements of the Housing Act 1996 (Part VI), the Homelessness Act (2002), the Localism Act (2011) and the Homelessness Reduction Act (2018) (*and other legislation*) to provide a framework for assessing housing need, priority and determining who will be nominated to Registered Providers for housing. The approach in the Allocations Policy recognises that there is a continuing need for affordable housing at the District level that the Council must respond to.

Similarly, the Council's Local Plan policy for affordable housing is set at a District level to meet a district-wide need and only introduces a "local connection" for Rural Exception Schemes. These are proposals for 100% affordable housing on sites in rural settlements (as an urban area, this does not apply to Glenfield) where there is a demonstrable local need that is unlikely to be met by larger schemes providing 25% affordable housing on-site.

The clause is not in conformity with the strategic policies of the Local Plan and so does not meet the third basic condition. It is also contrary to other policies of the Council. For the reasons set out above, clause (e) of Policy H4 should be deleted.

Policy H5: Design Principles

The policy covers a range of issues and largely duplicates existing considerations covered by Core Strategy policies CS2, CS21 and Delivery DPD policies DM1 and DM2.

Policies need to be concise, direct and unambiguous to be effective. Policy H5 needs to be clearer so that it can be interpreted by those using the policy to prepare planning applications and the decision-taker in determining the application. Detailed comments are made below.

The policy addresses design considerations and but it does not make clear whether it applies to housing, employment and householder applications i.e. residential extensions.

The policy is ambiguous in its wording. The initial paragraph:

- The term “Contemporary and innovative materials” is considered is unclear and needs to be clarified.
- The phrase at the end of the first paragraph “The Plan requires that they have regard to the following design principles, where appropriate.” is an unclear instruction to how the criteria following on from this statement should be treated.

The policy does not explain how the design criteria listed will be assessed or validated by a case officer or how an applicant would confirm an intention to follow the design criteria listed.

Part c) the term “private spaces” is undefined. It is considered to be ambiguous and so cannot be tested by a case officer.

Part d) is replicated as policy CC2 ‘Energy Efficient Buildings’ of the Neighbourhood Plan. It would be logical to remove the clause from this policy so there is no duplication. Whilst the Council is supportive of development that moves towards zero carbon, clause (d) of the policy is unclear in terms of its reference to ‘habitations and construction costs’. The policy is ambiguous in terms of what it is trying to achieve and so contrary to the first basic condition.

Part d) i) query what is considered to be a “light external finish” and where would this apply or be appropriate. This clause could be interpreted to conflict with the main body of the policy H5 which seeks to protect the area’s character.

Part d) v) evidence, such as viability testing, is needed to justify the use of the BREEAM standard. It is also unclear whether this criteria is intended for residential or commercial development. BREEAM has different standards for different types of development.

Part g) The policy should refer LCC Highways requirements if it is going to be adopted.

Part h) ii) it is unclear as to why the second part defining fence and wall height is present within the same clause. No evidence is found to indicate that walls or fences of 1.5m height benefit hedgehogs.

Part h) iv) clarify the types of proposals this clause applies to i.e. does this clause relate to all proposals or just those affecting ancient, veteran and mature trees and trees or hedgerows of value? How does this part of the policy relate to Policy ENV5 Biodiversity?

Part h) iv) There is no evidence to support the planting ratio of 2:1. It is understood that normally a ratio of 3:1 is needed for some tree species.

Policy ENV 1: Local Green Spaces

NPPF Para 101 is clear that designating land as Local Green Space should:

- be consistent with the local planning of sustainable development and complement investment in sufficient homes and jobs and other essential services;
- only be designated when a plan is prepared or updated, and be capable of enduring beyond the plan period.

In addition, paragraph 102 of the NPPF indicates when a Local Green Space designation should be used. This comprises where the green space is:

- a) In reasonably close proximity to the community it serves;
- b) Demonstrably special to a local community and holds a particular significance, for example because of its beauty, historic significance, recreational value (including playing field), tranquillity or richness of its wildlife; and
- c) Local in character and is not an extensive tract of land.

Paragraph 103 of the NPPF is also clear that policies for managing development within a Local Greenspace should be consistent with those for Green Belts.

The Planning Policy Guidance Note on 'Open space, sports and recreation facilities, public rights of way and local green space' also gives further guidance.

- Paragraph 007 states that "Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making."
- Paragraphs 010 and 011 consider whether Local Green Space designations should be dealt with in areas with existing national designations such as Green Belt, Scheduled Monuments or Conservation Areas. In these circumstances, the advice is that if land is already protected by designation, then consideration should be given to whether any additional local benefit would be gained by designation as Local Green Space.

- Paragraph 019 gives advice about contacting the landowners at an early stage about proposals to designate any part of their land as Local Green Space and indicates that landowners will have opportunities to make representations in respect of proposals in a draft plan.

The Neighbourhood Plan seeks to designate two Local Green Spaces at Blackthorn Green / Fishley Belt (17.8 hectares) and St Peter's Churchyard (0.27 hectares). The land at Blackthorn Green / Fishley Belt (OS08) is designated as Green Wedge through Core Strategy Policy CS16. Green Wedges are a long standing tool used in Leicestershire to influence the form and direction of urban development. These are important strategic areas designated to prevent the merging of settlements, guide development form, provide a green lung into the urban areas and provide a recreation resource. Policy CS16 sets out the areas to which the policy applies, the uses that are appropriate in the designated Green Wedge and the characteristics any permitted development should retain or enhance. Designating Blackthorn Green / Fishley Belt as Local Green Space is likely to cause confusion and duplication with the existing strategic Green Wedge policy.

It is worth noting that the land at Blackthorn Green / Fishley Belt is owned by Leicester City Council and has been identified by the City Council as a potential development area. The City Council recently consulted on its publication Local Plan (Regulation 19). The proposed Local Plan includes an allocation for land at Western Park Golf Course for mixed use development and highlights its intention to extend this site into the area of land it owns located in Blaby District described by the Neighbourhood Plan as Blackthorn Green / Fishley Belt. It is unclear whether the Neighbourhood Plan Group have contacted the City Council as landowner in respect of the proposed Local Green Space designation.

The City Council has promoted the land at Western Park Golf Course (in Blaby District) for development through the District Council's Call for Sites (2019) and Regulation 18 consultations in 2019 and 2021. Work on the District Council's new Local Plan is ongoing and will take account of the work across Leicester and Leicestershire to the distribute of Leicester's unmet housing and employment land need. The District Council has housing and employment needs to plan for but at this stage has made no decisions about the locational strategy or site options to be included in its Local Plan. In line with national policy and advice, the Council must consider all site options promoted to it through a site selection process to determine which will be included as allocations within the Local Plan. The part of the site at Western Park Golf Course falling within Blaby District will be considered alongside other site options being promoted for consideration.

OS23 St Peter's Churchyard is protected from development by a number of policies. OS23 contains Grade II listed buildings and a Cemetery and is therefore subject to Core Strategy policies CS15 'Open Spaces, sports and Recreation', CS20 'Historic Environment and Culture' and Delivery DPD policy DM12 Designated and Non-designated Heritage Assets. In addition, the Neighbourhood Plan, through policy

ENV3 'Important Open Spaces' identifies and maps the site as an open space of high value. The proposed designation as a Local Green Space does not materially add to the site's existing protection and is not considered necessary.

The Neighbourhood Plan Group have considered the criteria in Paragraph 102 of the NPPF in terms of identifying areas to designate as Local Green Spaces. However, the Group has not demonstrated:

- Whether the designation will be consistent with the local planning of sustainable development and complement investment in sufficient homes and jobs and other essential services.
- Whether the designation will be capable of enduring beyond the plan period.
- The views of the landowner in terms of the designation.

Taking, the above issues into account, it is considered that neither of these areas meet the criteria to be designated as Local Green Spaces.

Policy ENV 3: Important Open Spaces.

Policy ENV3 identifies land designated in strategic policies as Key Employment Sites (Core Strategy Policy CS6, named by Delivery DPD policy SA5 and shown on the Local Plan Policies Map (2019)) at County Hall (parts of OS32) and Optimus Point (parts of OS04, parts of OS05, OS19, parts of OS31). The policy approach is inconsistent with strategic policy in that it seeks to designate areas protected for employment use purposes as open space of high value. At County Hall (OS32) the land is mostly car parking. The policy is inconsistent with the strategic policies of the Plan and so contrary to the third basic condition. The mentioned areas should be deleted from the Figure 8 and the inventory associated with this policy amended.

In addition, OS32 covers an area owned by the NHS (which is not identified in the inventory on page 37). On part of this site a planning permission has been approved and construction taken place for a child and adolescent mental healthcare service facility (18/0620/FUL). This site should also be removed from Figure 8 and the inventory.

Furthermore, the land at Blackthorn Green / Fishley Belt (OS08) is identified by this Policy as an area of 'Important Open Space'. It is also identified as a Green Wedge by the Core Strategy/Policies Map, as a Local Green Space and Areas of Separation by the proposed Neighbourhood Plan. This layering of designations brings a level of ambiguity. It is unclear to the decision maker which policy takes precedence. Further comments are made alongside the relevant Neighbourhood Plan policies. The strategic policy should take precedence.

Policy ENV 4: Sites of Natural Significance

Policy ENV4 identifies land to be protected by this policy that is designated in strategic policies as Key Employment Sites (Core Strategy Policy CS6) at County Hall and Optimus Point. The policy is inconsistent with the strategic policies of the

Plan. The policy is inconsistent with the strategic policies of the Plan and so contrary to the third basic condition.

In addition, the evidence to support this policy is not comprehensive. In particular, there is no justification to designate 'Sites of high local biodiversity significance'.

Policy ENV4 also seeks a biodiversity net gain of 20%. This is double the minimum requirement of 10% proposed by the Environment Act 2021. No evidence has been provided to justify the increased percentage or to prove the viability of this requirement. This is contrary to paragraphs 13 and 31 of the NPPF.

ENV5 Biodiversity

Policy ENV5 also seeks a biodiversity net gain of 20%. This is double the minimum requirement of 10% proposed by the Environment Act 2021. No evidence has been provided to justify the increased percentage or to prove the viability of this requirement. This is contrary to paragraphs 13 and 31 of the NPPF.

Policy ENV 6: Rothley Brook Green Wedge

The general thrust of the policy aligns with CS16 but the policy seeks to require environmental improvements and this goes beyond the encouragement of the strategic policy. The strength of the conditional requirements included within the Policy should be amended to reflect the approach of CS16.

The final paragraph of Policy ENV6 states "Large scale development for housing or business in the designated Green Wedge will not be supported other than in special circumstances". This approach is not consistent with the third clause of Core Strategy Policy CS16 which states "The need to retain Green Wedges will be balanced against the need to provide new development (including housing) in the most sustainable locations". Policy ENV6 should be amended to reflect Core Strategy Policy CS16.

Figure 10 showing the boundary of Rothley Brook Green Wedge includes land at Mill Lane Industrial Estate within the boundary. This land is designated as a Key Employment Site through Core Strategy Policy CS6 and is excluded from the Green Wedge on the Local Plan Policies Map. Policy ENV6 would have a detrimental effect to existing businesses located on this site. This approach is inconsistent with strategic policies and so contrary to the third basic condition. Figure 10 should be amended to delete the area of Mill Hill Industrial Estate as defined on the Local Plan Policies Map.

Furthermore, Figure 10 excludes two areas of land designated as Green Wedge most recently through the Delivery DPD and shown on the Policies Map (2019). This includes: firstly, land north of County Hall adjoining the boundary with Leicester City Council and Charnwood Borough Council and secondly, the land at Western Park Golf Course between Optimus Point and the Leicester City boundary. It is unclear whether this is intentional, particularly for the land north of County Hall.

Policy ENV 7: Area of Separation

Areas of Separation are a strategic policy tool guided by Core Strategy policy CS17 *Areas of Separation*. They perform a very important function in ensuring the coalescence between settlements is prevented and allow distinct communities to retain their identities. These are a more localised tool, compared to Green Wedges, as they tend to maintain narrow gaps between two settlements. Policy CS17 sets out the general locations where Areas of Separation will apply. This does not include any areas around Glenfield.

In addition, the land the policy ENV7 seeks to designate as an Area of Separation is already designated as *Green Wedge* under Core Strategy policy CS16. Policy ENV6 conflicts with the strategic policies of the Local Plan and so does not accord with the third basic condition. Policy ENV7 should be deleted.

Policies ENV8 to ENV 10: Heritage Assets

Policies ENV8 to ENV10 inclusive identify and map a different types of non-designated heritage assets located in Glenfield Parish. Subject to the evidence being accurate, this general approach is supported. However, there are concerns about the detail of the individual policies.

Policies ENV8 to ENV10 inclusive are unclear in terms of the procedure to be carried out to determine the significance of the heritage asset and the potential harm that may be caused. Policy DM12 of the Delivery DPD is clear on the approach that the applicant and the Council should take. It is recommended that policies ENV8 to ENV10 include reference to Policy DM12 so that the information required by the applicant and the approach to determine the application is clear. The same approach can be seen in Cosby's made Neighbourhood Plan. Otherwise, the policy will be ambiguous in terms of how the application should be determined and so contrary to the first basic condition.

In addition, the policies make no allowance for additional non-designated heritage assets that may come to light to be addressed. The HER database is a living database that is continually being added to.

ENV10 'Ridge and Furrow' requires the benefits of any development to substantially outweigh the damage to or loss of a heritage asset. The current wording is only appropriate for designated assets in line with paragraphs 201 and 202 of the NPPF. The policy relates to undesignated assets. The NPPF (2021, para 203) makes clear that planning decisions where development affects non-designated assets requires "a balanced judgement...having regard to the scale of any harm or loss". The policy is therefore contrary to the NPPF and so does not accord with the first basic condition.

The supporting evidence provided for policy ENV10 '*Ridge and Furrow*' is not consistent. Comparison of Leicestershire County Council's Historic Environment Record alongside the Neighbourhood Plan's designated sites highlights

inconsistencies. Significant areas of both designated sites are not fully corroborated by the Local Historic Environment Record data (1999). Currently, those areas identified to be protected by this policy are not robustly justified.

Policy CC1: Flood Risk Resilience

The Council recognises Glenfield has areas of concern relating to flood risk and is supportive that the Neighbourhood Plan seeks to protect future development from flooding related harm. However, some issues have been identified with the proposed policy:

- The policy refers to Flood Zones 2 and 3 as identified by Figure 18. Flood Risk Zones are subject to change and so it is preferred that the policy indicates Flood Zones indicated by the Environment Agency or an up-to-date Strategic Flood Risk Assessment.
- Parts b) and c) go beyond National Policy requirements in respect of managing and mitigating flood risk. For example, the Flood Risk and Coastal Planning Policy Guidance indicates, differing approaches for 'minor' and 'major' development, there is no requirement for a hydrological survey but a site-specific flood risk assessment.
- Ignore advice for site specific flood risk assessments for development over 1 hectare in zone 1. This could cause confusion for applicants and is contrary to national policy and advice.
- Parts a), e) d) and g) duplicate pre-existing policy requirements contained within the NPPF and the Core Strategy policies CS21 and CS22.

For the reasons stated, it is recommended that the policy is removed or amended.

Policy CC2: Energy Efficient Buildings

Policy CC2 duplicates of parts c) and d). of policy H5: Design Principles. There are also inconsistencies, for example in relation to BREEAM standards. The policy should also be clear as to whether it applies to all uses and size of development including householder extensions.

Policy H5 requires streamlining and so it would be logical to remove the duplication from policy H5 and have two distinct policies where policy CC2 covers energy efficient buildings. Please view the response indicating recommended changes to policy H5 that are relevant to CC2.

Part (f) of Policy CC2 refers to strategic policies that do not form part of the Blaby District Local Plan and there are no equivalent policies.

Policy CC3: Electric Vehicles.

Building Regulations Approved Document S 'Infrastructure for the charging of electric vehicles' is now published and takes effect from June 2022. Building work must comply with the Building Regulations and so the first paragraph of Policy CC3 is not required as a planning policy. The first paragraph of the policy should be deleted.

CC4 Homeworking

It is suggested that privacy, disturbance and overbearing effect, vibration, emissions and hours of working are added to the list of considerations in Policy CC4 clause (b).

Policy CF1: The Retention of Community Facilities and Amenities

CF1 should clearly list and identify the specific assets to be protected as community facilities and amenities within the Neighbourhood Plan. It is likely that some users, such as planning agents, of the Neighbourhood Plan will be unfamiliar with Glenfield. Without clearly identifying the names and addresses of the community facilities there is potential for ambiguity in terms of when to apply this policy. This is contrary to paragraph 16d of the NPPF and so conflicts with the first basic condition.

There are two strategic policies contained in the Local Plan that seek to protect community facilities and open spaces. Policy CS13 Retailing and other town centre uses of the Local Plan Core Strategy states, inter alia, that:

“This Council will seek to protect important local community facilities, such as pubs and community halls, from being lost through redevelopment. Where a proposal for the redevelopment of a local community facility is submitted, the Council will expect supporting evidence to justify its loss.”

Core Strategy Policy CS15 Open Space, Sport and Recreation sets out how to protect existing open space, sport and recreation facilities and when their loss, in total or in part, could be warranted.

The full policy is available to view on the Council’s website in the Local Plan Delivery DPD, but the relevant section relating to the protection of assets is copied below for reference:

“Existing open space, sport and recreation facilities will be protected, and where possible enhanced. Where development is proposed on existing open space, sport and recreation facilities, land should not be released, either in total or in part unless it can be demonstrated that:

- (i) It is surplus to requirements for its current play and open space function; and,*
- (ii) It is not needed for another type of open space, sport and recreation facility; or,*
- (iii) Alternative provision of equivalent quality, quantity and accessibility, or better, can be provided in the local area.”*

Parts of the policy CF1 duplicate existing strategic Local Plan policies CS13 and CS15. It is recommended that the policy concentrates on identifying the specific community facilities and amenities that the Group want to retain.

Also, Part b) of the policy states that development proposals must demonstrate that existing community facilities are no longer economically viable. However, the District Council has concerns about how economic viability is to be demonstrated by the

developers without the policy explicitly requesting an independent viability assessment and setting the parameters for such an assessment. The policy should be amended to remove the ambiguity.

Policy CF3 Schools and CF4 Medical Facilities

These policies essentially duplicate the previous policy provision *CF2: New or Improved Community Facilities*. It is recommended that these two policies on schools and medical facilities are incorporated within the previous policy CF2.

Policy CF5: Retail Outlets

Clause (a) of the policy refers to “no more than 10% of the total number of outlets are to be occupied by hot food take away uses”. It is unclear whether this relates to the ‘Local Shopping Centres’ defined in the Neighbourhood Plan and/or the district centre identified in the strategic policy Core Strategy Policy CS13 and defined by the Local Plan Policies Map (2019). It is also unclear how the figure of 10% has been derived. In some cases the Local Shopping Centres consist of between 3 to 5 outlets. This means that less than one outlet can be occupied by hot food take away uses and effectively bans new such uses in most of the Local Shopping Centres. The clause is ambiguous.

Clause (b) of the policy is affected by The Town and Country Planning Regulations 2020 which amend the Town and Country Planning Order 1987 and introduce significant changes to the system of ‘use classes’. Classes A, B1, and D1 are removed and replaced by new use classes E, F.1, and F.2. This amendment effectively makes what were previously changes of use permitted development. The policy needs to be amended to reflect these changes.

Clause (c) of the policy includes elements that it may not be possible to control through a planning application or a planning application is not required. An example would be the material or colour. Advert regulations may also have a bearing on the impact of colour.

The sites within the Neighbourhood Plan identified as ‘Faire Road Shops’, ‘Tournament Crossroads Shops’, and ‘Underwood Court Shops’ are covered by the Local Plan Delivery DPD Policy *DM6 Neighbourhood Parades*.

Sites listed as ‘Shops of the Square’ and ‘Superstore Shops’ are part of the District Centre for Glenfield identified in strategic Core Strategy Policy CS13 and defined by the Local Plan Policies Map (2019).

Policy E1: Support for Existing Employment Opportunities.

Further clarification is requested in terms of what is an “employment opportunity”.

The strategic Local Plan policy for protecting employment land is Core Strategy Policy CS6 ‘Employment’. Policy CS6 and its explanatory text refers to Use Class B employment uses. The policy seeks to protect Key Employment Sites from non-employment uses unless three listed criteria are demonstrated. Glenfield has three

Key Employment Sites—Mill Lane Industrial Estate, Optimus Point and County Hall—within its borders as indicated by the Local Plan Policies Map (2019). Key Employment Sites are protected under CS6 of the Core Strategy and SA5 of the Delivery DPD. The policy as written duplicates and conflicts with these policies.

The Neighbourhood Plan Policy does not add further detail to the existing Local Plan policies. The policy does not distinguish between Key Employment Sites or other existing employment sites. As written, Policy E1 weakens the conditions present within SA5 by reducing the time constraint under which a vacant property must be advertised for employment purposes, under the B uses classes, before a proposal can seek a change in use. This conflict will create confusion and ambiguity when applying the policies to make a planning decision.

Should the Parish wish to protect commercial business premises (covering a wider range of uses than conventional B-class uses) then it is requested that this is clarified within the policy by specific reference to the use class system or types of building, e.g. offices, industrial units, retail units, etc. The policy also needs to distinguish between Key Employment Sites and other existing employment sites. Without this additional information, the policy is in conflict with strategic policies and is not clearly written and unambiguous and so is in conflict with paragraph 16(d) of the NPPF (2021).

Policy E2: Support for New Employment Opportunities

The policy is also ambiguous because it does not clearly define “employment opportunity” (see comments made against Policy E1).

Part a) of Policy E2 does not conform to the strategic Core Strategy Policy CS16 Green Wedge. The policy refers to “small scale employment development” in a similar approach to that applicable within land designated as *Countryside* through Core Strategy policy CS18. The uses Policy E2 seeks to permit are not appropriate for land designated as Green Wedge under CS16. Policy E2 conflicts with strategic policies of the Local Plan and so is contrary to the third Basic Condition.

Several parts of Policy E4 also duplicate other policies in the Local Plan (Delivery DPD policies DM1, DM8, DM13) but also the Neighbourhood Plan, notably policy H5. In order to reduce ambiguity clauses (a), (c), (e), (f), (g) and (h) should be deleted and/or amended.

Policy T1: Traffic Management

Policy T1 duplicates, albeit it with amended wording, the thrust of strategic Core Strategy Policy CS10 Transport Infrastructure and the NPPF 2021. Part a) paraphrases paragraph 111 of the NPPF 2021 and so duplicates national guidance. Parts c, d, e, and f are contained in Policy CS10. This policy should be deleted due to the duplication and ambiguity in line with paragraphs 16d and 16f of the NPPF.

Appendices

The Neighbourhood Plan includes several Appendices. With the exceptions of Appendix 5 Local Heritage Assets and Appendix 7 Glenfield Character Areas, the appendices include evidence to support the Neighbourhood Plan that does not need to form part of the Plan. Appendix 5 and Appendix 7 includes maps and detail about the local heritage assets and character areas that need to be taken into account when determining a planning application and so should be retained within the Neighbourhood Plan. The other Appendices should not be retained in the final Neighbourhood Plan.

C013:Leicester City Council (Policy Team)

Thank you for consulting Leicester City Council on the emerging Glenfield Neighbourhood Plan ('the Plan'). This letter sets out the City Council's representation on the Plan.

1. Housing and the Built Environment

1.1. Leicester City Council welcomes that the Plan recognises 'Glenfield as an ever-growing community' (p. 8) and that it will look at innovative ways to secure sustainable growth within the Parish.

1.2. We also welcome Objective 2) of the Plan (p. 14), which acknowledges the importance of a sufficient supply of suitable housing in Glenfield due to a strong demand for housing. It is positive that the Plan recognises that providing a wide choice of high-quality homes is essential to developing a sustainable, mixed, and inclusive community. By providing a housing mix in terms of tenure and size, the Plan will help meet the needs of a well-balanced population, vital to the ongoing viability of local services and the prosperity of the community, particularly in light of Glenfield's ageing population.

1.3. As Glenfield Parish Council is aware, Leicester City has a declared 'unmet housing need', meaning that that portion of Leicester's housing need cannot be met within the city's administrative boundaries. This unmet need increased from 7,742 dwellings, as identified in the City Council's Regulation 18 draft of the Local Plan, to 18,700 dwellings after the Government applied a 35% uplift to the housing need of the 20 largest urban centres in the country. Leicester City and the Leicestershire authorities have worked together to produce a Statement of Common Ground (the 'SoCG') to distribute the city's unmet need within Leicester and Leicestershire, and Blaby District Council approved this SoCG on 19 July 2022. Any new emerging plan for Blaby District needs to take into account Leicester's declared unmet need and this also needs to be addressed in the Glenfield Neighbourhood Plan.

1.4. The Plan as drafted fails to set a defined, evidence-based housing target which is required of neighbourhood plans by Paragraph 103 of the National Planning Practice Guidance on Neighbourhood Planning. The Plan mentions that the housing need for Glenfield set out by the adopted Blaby development plan is out of date and this is given as the reason for not setting a housing target at this stage. In our representation to the Regulation 14 consultation on the Plan (December 2021), we reminded Glenfield Parish Council that in order for the Plan to proceed to referendum, it needs to set a housing requirement along with setting a policy approach for housing delivery and a list of developable sites to meet this defined

need. Despite the fact that we have previously drawn attention to the need to include these neighbourhood plan requirements in the Plan, Glenfield Parish Council has decided not to include them; as a result, the Plan as drafted should not proceed to referendum.

1.5. Regarding the individual policies in Section 5A. Housing and the Built Environment, we have the following comments:

1.6. The Blaby District Council New Local Plan Site Selection Methodology for Housing and Employment Site Options 2020 contains a Summary of Assessed Sites at Appendix 2, which includes three sites that are entirely or partly within Glenfield Parish. These sites have been assessed as reasonable for further consideration as part of the Blaby Local Plan preparation process. However, all of these sites fall outside the settlement boundary proposed in Policy H1. This appears to be a deliberate attempt to frustrate development within Glenfield Parish in contradiction of the purpose of the settlement boundary which is, as stated in supporting text for the policy, “to ensure that sufficient land is identified to meet residential need and that this is available in the most sustainable locations”. This policy therefore does not contribute to the achievement of sustainable development, thus the Plan fails to meet basic condition (d), as set out in Section 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended). The settlement boundary needs to be revised to identify sufficient land to meet residential need before the Plan can proceed to referendum.

Policy H1: Settlement Boundary

1.6. The Blaby District Council New Local Plan Site Selection Methodology for Housing and Employment Site Options 2020 contains a Summary of Assessed Sites at Appendix 2, which includes three sites that are entirely or partly within Glenfield Parish. These sites have been assessed as reasonable for further consideration as part of the Blaby Local Plan preparation process. However, all of these sites fall outside the settlement boundary proposed in Policy H1. This appears to be a deliberate attempt to frustrate development within Glenfield Parish in contradiction of the purpose of the settlement boundary which is, as stated in supporting text for the policy, “to ensure that sufficient land is identified to meet residential need and that this is available in the most sustainable locations”. This policy therefore does not contribute to the achievement of sustainable development, thus the Plan fails to meet basic condition (d), as set out in Section 8(2) of Schedule 4B of the Town and Country Planning Act 1990 (as amended). The settlement boundary needs to be revised to identify sufficient land to meet residential need before the Plan can proceed to referendum.

Policy H2: Housing Mix

1.7. Leicester City Council welcomes the fact that Glenfield Parish Council has undertaken a housing needs report looking at the required housing mix for the area as part of the preparation of the Plan. However, the report is based on out-of-date evidence as Blaby District Council approved the Leicester and Leicestershire Authorities’ Statement of Common Ground relating to Housing and Employment Land Needs (June 2022), in which the District Council agreed to take on 346 dwellings per annum of Leicester City’s unmet housing need for the period 2020 to 2036. Due to the close boundary relationship between Leicester and Glenfield, the report underpinning this policy needs to be updated to reflect the portion of Leicester

City's unmet housing need which is to be accommodated within Blaby District and the policy needs to be revised according to the findings of the updated report.

Policy H4: Affordable Housing Provision

1.8. Leicester City Council welcomes the identification of an affordable housing need within Glenfield. The requirement at Policy H3 a) for affordable housing provision to be based on local housing need is appreciated, but affordable housing provision must also take into account evidence studies for the wider area, including the Leicester Local Housing Needs Assessment.

1.9. Policy H3 e), which prioritises local housing provision for those with 'a local connection' to Glenfield Parish, should be expanded to include not just Glenfield Parish but also those who have connections close to the Glenfield Parish area. A local connection to an area extends beyond the boundaries of a parish.

2. The Natural, Historic and Social Environment

2.1. Regarding the individual policies in Section 5B. The Natural, Historic, and Social Environment, we have the following comments:

Policy ENV 1: Local Green Spaces

2.2. Two sites within Glenfield Parish are designated as 'Local Green Spaces' in the Plan: St Peter's Church Yard and the land referred to as 'Blackthorn Green and Fishley Belt'. Leicester City Council does not wish to comment on the designation of St Peter's Church Yard as this is unlikely to have an impact on the city. The following comments relate entirely to 'Blackthorn Green and Fishley Belt', which is known to Leicester City Council as the Glenfield part of the Former Western Park Golf Course ('FWPGC').

2.3. We strongly object to designation of the 'Blackthorn Green and Fishley Belt'/the Glenfield part of the Former Western Park Golf Course site as a Local Green Space on the following grounds:

A. Paragraph 102 of the NPPF sets the tests for designating a specific area of land as Local Green Space. It states that designation should only occur where the green space is:

B. The site is designated as part of a Green Wedge under Policy CS16 of the Blaby District Local Plan Core Strategy (2013). However, the Plan states that the 'Green Wedge' is under review as part of the emerging Blaby District Local Plan and there is an expectation that the further development required in Glenfield will result in the deletion of the Green Wedge policy. The Plan proposes to designate sites as Local Green Space due to concerns that the current Policy CS16 of the Blaby Core Strategy does not rule out development and does not afford the level of protection required by residents which would be achieved by designating these areas as Local Green Spaces.

C. Leicester City has a large housing and employment need. Opportunities must be maximised to ensure that the city can deliver as much of this need as possible on sites within or in close proximity to Leicester. The Statement of Common Ground created by the Leicester and Leicestershire Authorities agreeing an approach to address Leicester's unmet housing and employment need demonstrates the recognition by all the authorities that Leicester cannot meet its growth within its

administrative boundaries and that approximately 18,700 dwellings and 23 ha of employment land will have to be taken on by

“a) in reasonably close proximity to the community it serves;

b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land.”

The ‘Blackthorn Green and Fishley Belt’/the Glenfield part of the Former Western Park Golf Course site is not small; it is 17.8 ha in size which is an extensive tract of land. Nor can the site be considered local in character as it comprises over 3.5% of the entire Glenfield Neighbourhood Plan Area. The site therefore fails to meet criterion (c) of paragraph 102 of the NPPF. We raised this in our representation at the Regulation 14 consultation on the Plan and said that the designation of ‘Blackthorn Green and Fishley Belt’/the Glenfield part of the Former Western Park Golf Course as Local Green Space should not be taken forward within the next version of this plan. As the site retains this designation in the current draft of the Plan, we reiterate that the site cannot be designated as Local Green Space as it does not meet the requirements for designation under paragraph 102 of the NPPF.

Therefore, it is evident that the Local Green Space designation is being used in an attempt to obstruct future sustainable development in Glenfield rather than plan positively for local development as is required by paragraph 044 of National Planning Practice Guidance on Neighbourhood Plans.

C. Leicester City has a large housing and employment need. Opportunities must be maximised to ensure that the city can deliver as much of this need as possible on sites within or in close proximity to Leicester. The Statement of Common Ground created by the Leicester and Leicestershire Authorities agreeing an approach to address Leicester’s unmet housing and employment need demonstrates the recognition by all the authorities that Leicester cannot meet its growth within its administrative boundaries and that approximately 18,700 dwellings and 23 ha of employment land will have to be taken on by

the Leicestershire local planning authorities. As already stated, this Statement of Common Ground has been approved by Blaby District Council.

Glenfield Parish Council is aware that the Former Western Park Golf Course site is a proposed allocation in the emerging Leicester Local Plan 2020-2036, which has just completed Regulation 19 public consultation. The Glenfield portion of the site has also been identified as a site ‘for reasonable further consideration’ within the Issues and Options draft of the emerging Blaby Local Plan (the Glenfield part of the site to which the Local Green Space designation relates). Combined, the entire site will form a strategic site for Leicester delivering approximately 715 dwellings and 12 ha of new employment land. The site is critical for the delivery of the Leicester Local Plan 2020-2036.

Paragraph 101 of the NPPF states that “Designating land as Local Green Space should be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services”.

Paragraph 119 of the NPPF states that planning policies should promote an effective

use of land in meeting the need for homes and other uses. In attempting to designate this site as Local Green Space, Glenfield Parish Council is knowingly and actively undermining the effort to promote and deliver an effective and sustainable use of this land which will substantially contribute to meeting the housing and employment needs of Leicester City, thereby breaching both paragraphs 101 and 119 of the NPPF.

Policy ENV 3: Important Open Spaces

2.4. The Plan proposes that 'Blackthorn Green and Fishley Belt'/the Glenfield part of the Former Western Park Golf Course be designated as an 'Important Open Space' under Policy ENV 3. For the reasons set out under the above section of this letter relating to Policy ENV1, the site does not meet the criteria for this designation or other additional protections. We strongly object to the proposed designation of the site as an 'Important Open Space' in the Plan.

Policy ENV 4: Sites of Natural Environmental Significance

The policy identifies numerous sites within the plan which are 'of at least local significance for their natural environment features', including 'Blackthorn Green and Fishley Belt'/the Glenfield part of the Former Western Park Golf Course. This sets a low bar for designation under this policy. In our response to the Regulation 14 consultation, we pointed out that it is unclear what evidence has been used for designation and this remains the case. We recommend that evidence to support the proposed designation of sites under this policy is prepared.

Policy ENV 7: Area of Separation

2.6. Policy CS17 of the Blaby Local Plan Core Strategy states that "Areas of Separation are areas of open land designated specifically to maintain the character and identity of individual settlements through preventing their coalescence". This policy proposes to designate only 'Blackthorn Green and Fishley Belt'/the Glenfield part of the Former Western Park Golf Course. Glenfield and Leicester City have already coalesced to the north and east of this site to such an extent that Glenfield Parish is no longer an individual settlement separate from Leicester City. Therefore, attempting to designate this site as an area of separation is redundant.

2.7. Moreover, the policy does not meet the basic condition as it is not in general conformity with the strategic policies of the development plan, particularly Policy CS17 of the Blaby Local Plan Core Strategy which states that the need to retain Areas of Separation will be balanced against the need to provide new development (including housing) in the most sustainable locations. It is evident that this is another policy for which the primary purpose is to frustrate development of a known proposed Local Plan site allocation.

2.8. It is appreciated that this land currently benefits from protection as part of the Green Wedge within the Blaby Development Plan. However, in terms of providing an area of separation, it is reliant on land within Leicester City Council's administrative boundary that is part of the wider Green Wedge. Allocation of the Leicester City part of the Former Western Park Golf Course within the emerging Leicester Local Plan will limit this area to a narrow strip of land, thereby greatly reducing its stated function of preventing further physical and visual coalescence of Leicester with Glenfield.

Please note that the City Council will keep this matter under review and consequently reserves its position as to whether legal proceedings may be necessary to protect the integrity of the City Council Local Plan.

D001: Chapman Estates, Magnificent Seven LLP, and David Bennet & Tom Archer Discretionary Settlement:

Representations submitted in response to the consultation of the Glenfield Neighbourhood Plan under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012 (as amended).

General Comments

1 Summary

1.1 These representations are made on behalf of Chapman Estates Ltd (CEL), Magnificent Seven LLP and the David Bennet & Tom Archer Discretionary Settlement in conjunction with Land North of Glenfield.

1.2 The draft Neighbourhood Plan (NP) seeks to introduce Policy ENV6 (Rothley Brook Green Wedge).

1.3 Policy ENV6 seeks to impose development restrictions that are more restrictive than those contained in Policy CS16 of the adopted Local Plan.

1.4 Following the publication of the Neighbourhood Plan for consultation, CEL sought legal advice from Counsel over the lawfulness of the Neighbourhood Plan as currently drafted.

1.5 Counsel concluded that Policy ENV6 should be deleted from the Neighbourhood Plan in order that it might be able to satisfy the basic conditions as contained in Paragraph 8 (2) of Schedule B of the Town and Country Planning Act 1990 upon examination should it proceed to that stage. A copy of the advice is contained in Appendix 1.

1.6 This Council is urged not to submit this Neighbourhood Plan for examination without Policy ENV6 having been amended to align with the Local Plan.

2. Introduction

2.1 The Glenfield Neighbourhood Plan Advisory Committee has produced *the 'Glenfield Neighbourhood Plan' 2022-2029* on behalf of Glenfield Parish Council.

2.3 Should the NP be submitted for examination Paragraph 8(1)(a) of Schedule 4B of the *'Town and Country Planning Act' 1990* requires the examiner to consider whether the NP meets the 'basic conditions'. The basic conditions are set out at Paragraph 8(2) and include:

(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order;

(b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;

(c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;

- (d) The making of the order contributes to the achievement of sustainable development;
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area);
- (f) The making of the order does not breach, and is otherwise compatible with, [retained EU obligations], and
- (g) Prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order

2.4 Paragraph 10 (4) of the act states that the appointed examiner must not recommend that the submitted plan is put to a referendum if he or she has reached the conclusion that it does not meet the basic conditions as contained in paragraph 8 (2).

2.5 A Neighbourhood Plan may proceed in advance of the adoption of an up-to date Local Plan notwithstanding the requirement at Paragraph 8(2)(e) that it must be in general conformity with the strategic policies contained in the development plan for the area.

3 Planning Policy

Local Plan

3.1 The adopted development plan for the area in question comprises Blaby District Core Strategy which was adopted in 2013 and the '*Blaby District Local Plan Delivery Plan Document*' which was adopted in February 2019. The '*Blaby District (Delivery) Development Plan Document*' (2019) also forms part of the local plan.

3.2 Policy CS16 (Green Wedges) of the adopted Core Strategy sets out a number of strategic objectives for Green Wedges these include:

- iv) To maximise sport and recreation opportunities;*
- vi) To protect the important areas of the District's natural environment (species and habitats), landscape and geology and to improve biodiversity, wildlife habitats and corridors through the design of new developments and the management of existing areas by working with partners;*
- vii) To preserve and enhance the cultural heritage of the District, recognising its contribution to local distinctiveness and to seek design solutions which preserve and enhance heritage assets where they are impacted by development.*
- ix) To minimise the risk of flooding (and other hazards) to property, infrastructure and people; and*
- xi) To deliver the transport needs of the District and to encourage and develop the use of more sustainable forms of transport (including walking, cycling, other forms of non-motorised transport and public transport).*

3.3 Policy CS16 goes onto state that Green Wedges are important strategic areas. They will be designated in order to:

- Prevent the merging of settlements;□
- Guide development form;□
- Provide a green lung into the urban areas; and□
- Provide a recreation resource.□

3.4 *The need to retain Green Wedges will be balanced against the need to provide new development (including housing) in the most sustainable locations.*

Land use or development in Green Wedges should:

a) retain the open and undeveloped character of the Green Wedge;

b) retain and create green networks between the countryside and open spaces within the urban areas; and

c) retain and enhance public access to the Green Wedge, especially for recreation.

National Planning Policy

3.5 *'National Planning Policy Framework' (NPPF) (2021) sets out the Governments Planning Policies and how they should be applied. The following paragraphs are considered relevant to these representations.*

3.6 Paragraph 18 states that *'policies to address non -strategic matters should be included in local plans that contain both strategic and non- strategic polices and/or in local or neighbourhood plans that contain just non-strategic policies.'*

3.7 Paragraph 29 states that Neighbourhood Plans should *'not promote less development than those set out in strategic policies for the area, or undermine those strategic policies.'*

3.8 Paragraph 30 states *'that Once a neighbourhood plan has been brought into force, the policies it contains take precedence over existing non-strategic policies in a local plan covering the neighbourhood area, where they are in conflict; unless they are superseded by strategic or non-strategic policies that are adopted subsequently.'*

Planning Practice Guidance

3.9 Guidance on how the policies in a neighbourhood plan should be drafted is contained in Planning Practice Guidance. It states:

'A policy in a Neighbourhood Plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently and with confidence when determining planning applications. It should be concise, precise and supported by appropriate evidence. It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.' (Paragraph: 041 Reference ID: 41-041-20140306)

Specific Comments

Draft Neighbourhood Plan

3.10 Policy ENV6 (Rothley Brook Green Wedge) of the draft Neighbourhood Plan states:

'Development proposals in the designated green wedge will only be supported if they promote or incorporate environmental improvements (biodiversity, flood risk mitigation), retain the open and undeveloped character of the green wedge, retain or create green networks and wildlife corridors, retain or enhance public access, and fall into one or more of the following categories:

- Agriculture, allotments and horticulture (not garden centres)*
- Outdoor sport and recreation, including small-scale associated buildings*
- Forestry; tree planting or 'rewilding' for combatting climate change and biodiversity loss*
- Flood mitigation infrastructure*

- *Nature areas and appropriate associated interpretative and educational infrastructure Footpaths, cycleways and bridleways*
- *Burial grounds*
- *Large-scale development for housing or business in the designated green wedge will not be supported other than in special circumstances.'*

4 Considerations

4.1 We consider that policy ENV6 of the draft Neighbourhood Plan as currently drafted does not meet the basic conditions requirement as set out at Paragraph 8(2) for the following reasons:

4.2 The wording of policy ENV6 as drafted not only repeats Policy CS16 but also seeks undermine the strategic policies of the plan through imposing additional restrictions to existing policies and remove any form of balance within the core strategy Green Wedge Policy as contained in Policy CS16.

4.3 The restrictions include the words '*only be supported*' when considering development proposals in the designated green wedge. The wording *and fall into one of the specified categories is* also included. Neither of these restrictions are contained in the wording of Policy CS16 and thereby fail to comply with paragraph 29 of the NPPF.

4.4 Policy CS16 lists the categories of development which would be considered acceptable in the Green Wedge. These include wind turbines, park and ride schemes, transport infrastructure and mineral extraction. These categories for development listed are not listed in Policy ENV6 and the policy is therefore more restrictive.

4.5 Furthermore, Policy CS16 provides a non-exhaustive list of developments considered 'appropriate' in Green Wedges (*'Uses that are appropriately located in Green Wedges include...'* whereas Policy ENV6 provides an exhaustive list (*'...and fall into one or more of the following categories...'*

4.6 Policy ENV6 includes wording that requires *any* development in the Green Wedge promote or incorporate environmental improvements and retain or enhance public access. These additional requirements are not contained in the adopted local plan which 'encourages' environmental improvements and improve access.

4.7 Counsel considers that the approach taken by the neighbourhood plan seeks to *cut down the* operation of policy CS16 and introduce further requirements thereby imposing a much more restrictive approach to the consideration of development proposals in the Green Wedge.

4.8 Policy ENV6 cannot therefore be considered to be in accordance with the strategic policies contained in the adopted local plan as required by paragraph 8 (2) (e). Further the restrictions added do not accord with paragraph 18, 29 and 30 of the NPPF. Paragraph 8 (2) (a) is not therefore accorded with.

4.9 Policy ENV6 seeks to introduce the wording will not be supported other than in '*special circumstances*'. It would appear the Neighbourhood plan is seeking to have a similar requirement for development within the Green Belt which states inappropriate development will not be supported except in '*very special circumstances*'. The requirement to demonstrate special circumstances for development within Green Wedges does not existing in the NPPF, as such the inclusion of this requirement does not accord with paragraph 8 (2) (a).

4.10 There is no explanation in the neighbourhood plan whatsoever as to what 'special circumstances' might be or how they operate? Further the adopted local plan does not include a test of special circumstance to have been met, rather it takes a more open approach recognising that 'The need to retain Green Wedges will be balanced against the need to provide new development (including housing) in the most sustainable locations' (Policy CS16).

4.11 The inclusion of the special circumstance test fails to meet the relevant standards as required by Planning Practice Guidance (Paragraph: 041 Reference ID:41-041-20140306). As worded it is not clear and unambiguous, not precise, cannot applied consistently and is not supported by any evidence. The inclusion of the special circumstance test therefore does not accord with paragraph 8 (2) (a).

4.12 The area covered by the Green Wedge policies in the NP is greater than that identified on the adopted local plan proposals map including the existing industrial estate. Given this industrial estate has already been built out the inclusion of this land does not reflect the purposes of the Green Wedge as set out in Policy CS16. This approach does not accord with paragraph 8 (2) (e).

5. Future Development Needs

5.1 Policy CS16 states that *the need to retain Green Wedges will be balanced against the need to provide development (including housing) in the most sustainable locations. The detailed boundaries of the existing Green Wedges will be formally reviewed through allocations, designations and Development Management DPD.*

5.2 An appeal (APP/K240/W/22/3297466) (Appendix 2) for 8 dwellings also within the Green Wedge in Hinkley and Bosworth Borough Council was allowed in September 2022. In considering the proposals against the role and function of the green wedge as contained in Policy 6 of the adopted local plan the Inspector considered that the proposal would have an acceptable effect upon the role and function of the Green Wedge and did not therefore conflict with Policy 6.

5.3 It is clear that Policy CS16 offers a balanced approach towards future development in Green Wedges. It is considered that the site north of Glenfield is ideally placed to meet future development needs for Blaby District Council whilst achieving the roles and functions of the Green Wedge as set out in Policy CS16. The concept plan accompanying these representations (Appendix 3) shows how a mixed use development could come forward on this site whilst achieving the objectives of the Green Wedge.

Prevent the merging of settlements

5.4 The A46 running along the sites north western boundary acts a defensible boundary. A landscape buffer running alongside the A46 as shown on the concept plan ensures built development in either Blaby District Council or Hinkley and Bosworth Borough Council will have no physical presence along this transport route with no perception of the gap closing and both remaining separate settlements

Guide Development Form

5.5 As worded the Neighbourhood Plan seeks to preclude development or at least make development within Green Wedges more restrictive. Given the site adjoins the existing urban area of Glenfield it is a sustainable location for future urban development to provide future housing and employment needs.

5.6 Glenfield should be required to accommodate future development needs given its status as a 'Principal Urban Area' in the adopted Core Strategy. Development in these settlements is recognised in the Core Strategy as being one of the most appropriate locations for development.

5.7 There are existing services including a supermarket, pharmacy, library and primary school all within walking distance from the site. It is therefore a sustainable location and ideally placed in order to accommodate development.

5.8 Restricting development on the site through a Green Wedge Policy therefore risks less sustainable locations having to forward to meet future needs. Such an approach does not accord with or contribute towards the objective of sustainable development as required by paragraph 8 (2) (d).

Provide a green lung into the urban areas and provide a recreational resource.

5.9 Areas of open space will be provided for recreational use within the site thereby retaining the open and undeveloped character of the site, increasing the provision of amenity space for existing and future users and whilst achieving net gains in biodiversity.

5.10 Currently the site is only accessible to member of the public through use of the public rights of way that run along the sites north west and south east boundary. Public access to the site will improved through new footpaths and cycleway across the site in addition to the areas of open space proposed.

5.11 Areas at risk of flooding in the south east corner of the site running parallel with the Rothley Brook will remain undeveloped in order to prevent the loss of floodplain. These areas will also act as open space and together with the open space provided within the site will provide a green lung.

5.12 Sustainable Urban Drainage Features in the form of attenuation basins will be provided to manage surface water run-off from the development and improve any existing on site flood issues.

5.13 EDP have undertaken a Green Wedge Review to assess whether the site can accommodate development whilst continuing the deliver the functions of the Green Wedge. EDP concluded that if development were to be permitted in this location it would continue to maintain the functions of the Green Wedge in this location. A copy of the report prepared by EDP is contained in Appendix 4.

6. Action Required

6.1 As set out above as worded Policy ENV6 does not meet the basic conditions as set out at paragraph 8 (2) of schedule 4B of the Town and Country Planning Act 1990. Policy ENV6 should therefore be deleted so that the Neighbourhood Plan can satisfy the basic conditions upon examination should it proceed to that stage.

R050:

We would like to comment on the Glenfield Neighbourhood Plan 2022-2029.

In particular I wish to draw your attention to page 54 where the plan discusses Community Facilities, health and wellbeing. We feel the plan fails to recognise the former Western Park Golf Course and other open spaces as existing assets of community value.

We have moved to Glenfield from Leicester City in November 2019 and as a family we have been and continue to regularly visit the Western Park Golf Course as well as other open spaces / nature spots like Ellis Park and Ivanhoe Trail. In our view these spaces / land are real community assets. Being able to get away from our busy lives and use these spaces to unwind, relax, stay active through walking, cycling, etc, has been invaluable to us. Ellis Park also offers the outdoor gym facilities which we've used on many occasions. Access to these sites within walking distance helped us maintain our mental and physical health, and a general sense of wellbeing, especially during the pandemic, and it continues to do so. This is also where we meet our neighbours and connect with the local community. My wife and I take a daily walk through the golf course and Ellis Park. We enjoy regular long walks on weekends through the golf course and the Ivanhoe Trail. The former golf course is also one of very few large open spaces for dogs and dog walkers to freely enjoy. The site is also a beautiful nature spot and a home to some breathtaking flora and fauna, including many mature trees.

These spaces are incredibly important to us as local residents and we wish to protect them. We have previously raised our objections to the proposed developments on the former Western Park Golf Course site. We feel this would be a terrible loss to the local community and it would make us question wanting to remain in Glenfield. The large scale development on this site with proposed mix of housing and industrial buildings, including permanent caravan spaces, would have a detrimental impact on the local environment, levels of traffic and noise, air quality, strain on the local infrastructure and amenities. It would also mean the loss of a cherished green space which has become our sanctuary and a favourite walking spot for our family.

We hope our views are considered as part of these representations.

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