

Q31. Are there any other issues, not covered in this paper, which you think should be considered in the LDF?

No.	Respondent	Response
1.	Kirby Muxloe Parish Council	No answer
2.	Natural Life Leicestershire County Council	No answer
3.	National Playing Fields Association,	No answer
4.	The Gypsy Council	No answer
5.	LE9 2LT	I think current refuse collection policy is better than in any other Leics district. Keep up the good work
6.	Health & Safety Executive	No answer
7.	Grove Park Commercial Centre Ltd	Structure Plan Employment Policy 3 – Office Development – Policy should <u>not</u> apply to ex HQES @ Grove Park, i.e. explanatory memo para 7.43 to be retained
8.	Alliance & Leicester Plc	No
9.	LE3 2JP	School improvements
10.	LE9 2DF	Extra lighting for road and safety and make sure these are unobstructed by trees
11.	LE19 3ET	I believe that in any forum, e.g. BDC, representatives are encouraged to vote by conscience and not follow commercial pressures, e.g. represent the community first
12.	Transport 2000 (Leicestershire)	Yes – Rights of Way/footpaths, etc. Walking is an important form of transport and links to bus and train services but you've not even mentioned it
13.	LE3 8AE	Bus routes – some villages badly served and most services are in and out of Leicester – a circular route, Fosse Park to Beaumont Leys shops via Thorpe Astley and Meridian, LFE, Kirby Muxloe, Glenfield and Glenfield Hospital, would be great help
14.	Architectural Liaison Officer. Leicestershire Constabulary	No answer

15.	Jelson Limited	No answer
16.	LE18 3TH	No
17.	A J Granger	No
18.	Cllr E A Webster-Williams	No
19.	LE9 3GB	New housing developments should only be allowed if they incorporate solar panels and good insulation. I am very impressed with the new recycling policy
20.	LE3 2XH	Yes – People should be responsible for trees, shrubs, etc, which grow across pavements. Unpleasant in wet weather
21.	LE19 3LY	No answer
22.	LE3 3AB (Anon)	No answer
23.	LE2 9JQ	No answer
24.	LE8 4DN	No answer
25.	LE3 8PU	TRAFFIC NOISE – ESPECIALLY M1 WIDENING PLAN
26.	LE8 5RH	No answer
27.	Leicester Forest East Parish Council	Air pollution should be covered within the LDF.
28.	Anon LE3 3LY	Air pollution
29.	LE9 Anon	Defined settlements must be preserved and village settlement boundaries (green wedges) kept at all costs to preserve the community spirit of villages
30.	LE8 6LT	No answer
31.	LE8 5RD	More facilities for young people to keep them off the streets. Whatever happened to youth clubs, snooker halls, etc, that we had years ago. More police on the beat in the evenings.
32.	LE19 3ET	Each area should have a Council “shop” where people could go for advice. Also direct access to a local policeman as a known base.
33.	LE9 1SX	No answer.
34.	Cllr Dilks	Equestrian activities do not appear to have been addressed specifically.
35.	LE9 3GG	None come to mind but could be air pollution.
36.	LE9 3BA	Transportation of the elderly who are still capable of using public transport to and from hospitals.

37.	A T	No answer.
38.	LE8 5YJ	No.
39.	Anon	Air pollution.
40.	Stoney Stanton WI	Post offices should be given all support and protection – banks in rural areas are being closed.
41.	Stepping Stones Countryside Management Project	No answer.
42.	LE3 8EH	I think that you should address the issue of climate change overtly and that the LDF needs to assess the impact that this will have on issues such as flash flooding. "Enable" is currently working on a climate change strategy for the Leicestershire area.
43.	Cllr Alan Tanner	An off-road transport policy, a local train which would run on rubber tyres not tracks on asphalt paths to be shared with cyclists, etc.
44.	Ford & Slater Limited	No answer.
45.	BT Group Plc	<p>Our client's principle concern is the ongoing provision, maintenance, repair, renewal and enhancement of a comprehensive telecommunications service. It is therefore essential that the Local Plan promotes such activity in line with Government guidance.</p> <p>Allied to this, our client is the beneficial owner of a varied portfolio of land and buildings in the District and it is possible that as a result of advancing technologies and better work practices, some opportunities will arise for the release of these in whole or in part during the emerging plan period. As such, it is important that the LDF should also acknowledge the potential benefits of re-using or re-developing sites in line with Government guidance.</p> <p><u>Telecommunications</u></p> <p>The continued supply and development of communications technology is a fundamental component of the Government's sustainable strategy helping to reduce the need to travel. PPG 8 should be used as guidance for writing the policies. Paragraph 39 of PPG 8: Telecommunications, August 2001, identifies that criteria in policies of local</p>

		<p>plans should be:</p> <p><i>“Flexible enough to allow for the efficient development of the network and the demands imposed by the technology.”</i></p> <p>Paragraph 40 of PPG 8 recognises that local plans should include general policies on:</p> <p><i>“The siting and external appearance of apparatus including any location and landscaping requirements designed to minimise the impact of such apparatus on amenity, without inhibiting operational efficiency.”</i></p> <p>It is suggested therefore that the next stage of the LDF should contain a strong presumption in favour of supply of telecommunications services, including the development of existing services. It is suggested that the telecommunications policy should read along the lines of that set out below:</p> <p>“Planning permission will be granted for telecommunications development. Where there is potential conflict with environmental objectives, telecommunications development will be allowed provided:</p> <ul style="list-style-type: none"> ▪ It is sited and designed so as not to result in significant adverse impact, subject to operational and technical requirements. ▪ There are no satisfactory alternative sites for telecommunications available. ▪ There is no reasonable possibility of sharing facilities. ▪ In the case of radio masts, there is no reasonable possibility of erecting antenna on an existing building or structure. <p>It should also be noted that the suggested policy deliberately and properly excludes mention of health issues or a precautionary approach to the siting of mobile phone installations. BT feel that such aspects are fully and adequately described within PPG 8 and most importantly would draw the Council’s attention to the references to the IEGMP report of 11/5/00 in paragraph 89 which states:</p> <p><i>“...the report concludes that the balance of evidence indicates that there is no general risk to health...”</i></p>
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		and paragraph 94 which emphasises: <i>“It is not for the local planning authority to seek to replicate through the planning system controls under the health and safety regime...”</i>
46.	Persimmon Homes (North Midlands) Ltd	Very little on transport issues and the poor state on the so called “public” (really private) transport.
47.	Leicestershire County Council (Structure Plans)	Development in rural centres, Greenfield development, reviews of green wedges, development on open land between settlements, developing in the countryside and regeneration.
48.	Department of Highways, Transportation and Waste Management Leicestershire County Council	<p>(any other issues) - A large number of other highways and transport issues will need to be discussed between the County Council and the District Council with a view to their possible inclusion in the LDF.</p> <p>The following major transport schemes and studies should be considered for inclusion in the LDF:</p> <p>A large park and ride site near the A46/A50 junction. The position should be checked at the time of preparing the consultation draft. The reservation for the proposed Earl Shilton Bypass should reflect the planning permission for the Bypass. Possible improvements to the A5 Trunk Road which may arise from various studies by the Highways Agency. M1 widening and M69 slip roads (Highways Agency).</p> <p>Development control has hitherto relied on various policies in Local Plans, on Government guidance and on good practice. However, the Government appears keen to reduce the number of policies locally and any such reduction is likely to be sharpened when the Structure Plan is replaced regionally by the RSS. Various development plan policies have served the Highway Authority well in the past and I would wish to discuss with you the best way forward. For example:</p> <p>a)New development will inevitably add to the general growth of traffic in the district. However,</p>

		<p>the proposed abolition of structure plans could lead to a need for Transport Policy 4 of the adopted Structure Plan (or the one superseding it), which has been well used in controlling development, to be included in the LDF policies.</p> <p>b) Road safety is of major importance and the Government has set challenging targets for casualty reduction. LDF policies should require safe and satisfactory access to new development and compliance with HTD.</p> <p>c) The County Council has reviewed, and will continue to review, its recommended car parking standards. Although “maximum” standards are in place, there should be a policy requirement for adequate parking provision.</p> <p>I would also welcome discussions on how to apply the RPG 8 parking standards in a consistent way.</p> <p>New development should be situated close to effective public transport routes.</p> <p>In pursuing sustainable development, it should be demonstrated how new development will contribute to more sustainable modes of travel and where these modes are not readily available or not attractive a development obligation should be sought where practical for:</p> <p>Improved walking and cycling provision. Enhanced public transport infrastructure. Improvements to/introduction of bus services.</p> <p>Public transport interchange points may need defining. Lorry parking would seem to be an issue needing some forward planning. This is not specific to Blaby District but a countrywide issue.</p> <p>The County Council still has a relatively large number of minor improvement lines in Blaby District and it would be helpful to know in good time at what stage (if any) you would wish me to review these, a process likely to take at least several months.</p>
49.	Cllr John Kenney	Recreation facilities for teenagers. We've

		reasonably kept pace with facilities for younger children but local amenities, especially Parish Councils, are reluctant to provide anything for older children. This failure has historical roots – 30-40 years ago most children left school at 15 straight into full time employment and the adult world. There wasn't so much of a need then.
50.	Blaby Parish Council	Protection of recreational land.
51.	Strategic Planning - SRA	<p>Encouragement for Rail Freight</p> <p>A positive enabling policy to encourage provision of rail freight facilities should be drafted so as to be supportive of the movement of goods by rail rather than by road. Creating a planning policy framework which supports carriage of goods by rail is important in securing potential investment in future rail freight operations.</p> <p>We would suggest a policy along the following lines would be of benefit:</p> <p>“Development which will encourage the transfer of freight from road to rail, including the development of freight handling facilities, will be permitted unless there is overriding conflict with other planning and environmental considerations. If necessary, conditions will be imposed on planning permissions in order to maximise the amount of non-road borne freight movements.”</p>
52.	Local Strategic Partnership	Future work needs to link to and be aware of the impact upon LSP priorities.
53.	Woodland Trust	No answer.
54.	Glenfield Parish Council	We do not have anything to add at this point in time.
55.	Sapcote Parish Council	Commuted Sums Arising Out of New Development – There should be a fundamental change of approach in respect of commuted sums arising out of new residential development with the emphasis being on such monies being spent in the areas where the developments that gave rise to the contributions are located. The distribution of such monies should not be at the whim of politicians but should be allocated as described above in accordance with an

		established formula.
56.	LE3 8SD	N/A.
57.	Aston Flamville Parish Meeting	No answer.
58.	Leicester & Rutland Society of Architects	New highways/highway improvements.
59.	Cattrell Associates	No answer.
60.	LE19 4WE	Fully open J21a (M1 motorway) with further access/exits to relieve pressure on J21.
61.	The National Trust	The role of Landscape Character Assessment in guiding the location and form/character of new development.
62.	Billington Road West Elmesthorpe	All developers should make a contribution to providing local amenities whether they are building one house or 100. This should be a pre-requisite of planning permissions and the payment should be made BEFORE building starts. The Council should encourage more innovative design in housing and particularly more energy efficient housing. Builders should be forced to include all types of dwelling within larger developments otherwise they only construct "executive" homes that make them most profit. Developers should stick to their planning permissions, particularly on large scale developments. All too often after a first tranche is built the developer reapplies to get more homes on the site. It is imperative that local planning decisions are not overturned at appeal by Planning Inspectors as a routine, which seems to be the case at the moment. Inspectors should never give permission when a development is clearly against local planning policies. It is almost 20 years since a Planning Inspector ruled that the road should take the southern route (Earl Shilton Bypass) between the villages of Elmesthorpe and Earl Shilton. The amount of traffic on our roads has increased so much that I believe Blaby District should press urgently for a new public inquiry into the route. The major issue is the impact this would have particularly on the hamlet of Elmesthorpe. For how long should planning decisions such as

		this be valid? In what other circumstances would a decision made a generation ago carry so much weight? Blaby District should not just include this road in a local plan/framework as a matter of course – it should be questioned EVERY time because circumstances change. Access and egress from the M69 to and from Coventry at J1 Sapcote should be provided.
63.	LE2 9HJ	I can't think of any other issues to be considered, the paper seems to be very comprehensive.
64.	LE8 4GD	No answer.
65.	Rutland Country Homes	No answer.
66.	LE9 9FW	No answer.
67.	LE2 9JA	Horse riders.
68.	Braunstone Town Council	Please refer to "Action Plan" (Pages 20-26).
69.	Leicestershire County Council (Chief Executive's Department)	Minerals and Waste Allocations will have to be taken into account by District Authorities, as will Mineral Consultation Areas (MCAs) which seek to safeguard economic mineral resources. Both of these items need to be shown ultimately on the District LDF Proposals Maps (ref. para 2.22 and Appendix A of PPS12). We are currently having the MCAs reviewed by British Geological Survey and these should be ready to be issued to Districts in Spring next year.
70.	Network Rail	We would welcome support in the plan for rail infrastructure proposals and movement of freight by rail in general terms. Finally, we would be interested to learn of the Council's stance on the re-opening of the rail line to Burton on Trent for passengers.
71.	Wm Morrison Supermarkets Plc	No answer.
72.	LE19 2JJ (1)	Yes – the overall aims of the Council should be publicised for the aims, ambitions and future status of the District. Each individual village/community could have distinctive signage on approach roads to give a sense of individual identities (and respect).
73.	Thurlaston Parish Council	No answer.

74.	Countesthorpe WI	No answer.
75.	LE19 2JJ (2)	We have been offered some land on Seine Lane, Enderby, which is classed as countryside. It is owned privately and we would like to build one dwelling.
76.	Leicester City Council (Regeneration and Culture)	<p>The consideration of a multifaith burial ground and crematorium at Enderby on land owned by the City Council as outlined in red on the attached plan. Please see attached background statement.</p> <p>Background to request for consideration of Multifaith Burial Ground and Crematorium at Enderby as part of Blaby District Council Local Development Framework Issues</p> <p>Leicester City Council undertook a strategic review of Burial and Cremation Service provision in 2003 which was informed by a number of factors including:</p> <ul style="list-style-type: none"> ▪ Review of City and Leicester Local Plan ▪ Local Environmental Services Best Value Review ▪ Shortage of Future Burial Land ▪ Representations from Faith Community Groups seeking to address cultural needs in relation to Burial and Cremation Service provision. <p>The review identified the need for further burial land to be identified and for a new crematorium to meet the needs of Leicester residents, in particular the cultural and religious requirements of Hindus, Sikhs, Buddhists and Jains. The development of a new crematorium would also support the Council's key priorities to build on Leicester's history of including people from all background in a cohesive community free to pursue peace and prosperity and develop wider access to culture.</p> <p>The Service Director for Cultural Services took a report to Cabinet on 1 March 2004 outlining the requirements for a new crematorium to meet the needs of Hindus, Sikhs and Jains. The proposed site area for the multifaith burial ground and crematorium would be 5 acres. The proposal for the crematorium is for a single storey chapel with assembly hall and display area to show the Life to Death experience. In total the area of the building would be approximately 928m² and designed to minimise the impact on the surrounding environment. A mobility plan will be</p>

		<p>developed for the site to ensure the impact from traffic on the site and surrounding environment is minimised.</p> <p>The City Council looked at a number of options for the siting of the crematorium including the land at Enderby which some years ago was shown on the Proposals Map of the Enderby and Narborough District Plan (1982) as committed for the erection of a crematorium. Several options were discounted as they would contravene the Crematorium Act 1902 Section 5 which requires the crematorium is not within 200 yards of residential development and 50 yards from a highway. The City Council is mindful of the fact that at present the land at Enderby is identified as Green Wedge but in the absence of other alternative sites would ask Blaby District Council to consider formulating their Planning Framework to allow for such a development.</p>
77.	Leicester City Council Investment and Development	<p>Leicester City Council own two major sites within Blaby District.</p> <ol style="list-style-type: none"> 1. The site marked pink on the plan is known as Enderby Quarry. In the current Local Plan this is zoned as "Employment Development Proposals". We would like to have the land allocated as Employment Land in the future Development Framework. 2. The site on the corner of Leicester Lane and St Johns marked green on the plan. This is allocated as Green Wedge or Open Space in the current Local Plan. We would like consideration to be given to this land being allocated for a range of different uses included Employment Land and Crematorium/Cemetery use.
78.	Next plc (CgMs)	No answer.
79.	LE19 2JJ (3)	Backland residential development of good quality where access is available and planning requirements can be met or where adjoining property occupants have no criticism of a scheme. Infill of spaces on frontages of land where ribbon development has taken place and land which is unproductive for agricultural , oversized / unwanted garden areas both at the side and rear of existing dwellings. Both situations would maintain development in established areas rather than isolated sporadic locations.

80.	House Builders Federation	No answer.
81.	LE9 9SU	No answer.
82.	Highways Agency	The LDF should include text to highlight that it is a legal requirement to consult the Highways Agency on certain applications close to the trunk road network. The procedures for consultation between Blaby District Council and the Highways Agency should be set out within the LDF.
83.	LE9 3HD	Less traffic lights, wider roads, buses that travel from Croft to Blaby instead of into town.
84.	English Nature Eastern area Team	No answer.
85.	LE3 8AT	No answer.
86.	LE8 4AQ	No answer.
87.	Anon	No answer.
88.	LE19 2 JH	Room for improvement in my opinion with regard to B.D.C. standards of communicating with the general public.
89.	LE2 3TJ	No answer.
90.	LE9 3EJ	Pollution; commercial and industrial.
91.	LE19 5HG	Yes, the overall aims of the council should be publicised for the aims ambitions and future status of the district, each individual village/community could have a distinctive signage on approach roads to give a sense of individual identities and respect.
92.	Housing Corporation	No answer.
93.	Development Plans Group Leicester City Council	No answer.
94.	Nottingham East Midlands Airport	No answer.
95.	Powers Estate	No answer.
96.	Thorpe Astley community Association	No answer.
97.	Blaby W.I	No answer.

98.	Leicester and Leicestershire Motorcycle forum Transport Strategy Team Leicester City Council	Although public transport will be the main alternative to the private car for the majority of local residents, PTWs also provide a means of transport for getting to work, visiting friends and relatives and doing the weekly shopping. They allow people access to a wide variety of services that might not be open to them otherwise, particularly where there is a limited or no public transport. Therefore, PTWs have a significant role to play in promoting social inclusion. Although PTWs are not suitable for all situations, we feel it important that they should be included in planning decisions. Therefore, organized car share or bike share schemes could help improve accessibility at locations not best served by public transport.
99.	Pegasus Planning Group	No answer.
100.	LE9 3BA	Yes more local council services in villages from time to time. Local First Aid Centres in smaller towns to alleviate demands on hospitals.
101.	British Waterways	<p>The waterways of the district must be shown on all maps within the proposed LDF. The waterways of the district are shown on map 1</p> <p>Blaby has a valuable asset in the Waterways network of urban Leicestershire. The numbers of people employed and related indirectly to employment in the sector is substantial in areas close to Blaby; there is scope to expand the employment opportunities provided by the canal in respect of tourism within the district.</p> <p>Inland waterways are regionally and sub-regionally significant tourism resources and they can contribute to achieving sustainable tourism. The value of inland waterways as a tourism resource is often poorly addressed by local planning policy.</p> <p>The LDF needs to recognise and promote waterways as a tourism resource in their own right, as well a catalyst for tourism led regeneration in urban, market towns and rural areas.</p> <p>The LDF needs to indicate on any proposals map, operational sites, facilities and infrastructure and facilitate the use of the</p>

		<p>waterways.</p> <p>The White Paper on integrated transport states that “inland waterways also have an important role to play in providing passenger transport” as any other mode of transport. In practice on a waterway such as the Grand Union canal, there is a greater potential for short haul freight movements than comprehensive passenger network services.</p>
102.	The Square, Littlethorpe, Leicester	No answer.
103.	Leics & Rutland Federation of Women’s Institutes	Is it possible for the issue of light pollution to be addressed?
104.	LE9 7SE	No.
105.	LE2 4QX	Untidy land, non active agricultural land should be considered for development.
106.	Glen Parva Environment Group	No
107.	J S Bloor (Services) Ltd	No answer.
108.	English Heritage	English Heritage will be publishing new guidance on the production of conservation area appraisals next year.
109.	Croft Parish Plan Group	<p>The Croft Parish Plan Group was formed in October 2003 with the aim of discovering the views of the residents of Croft and to provide a framework, which could then be used to improve the services and lives of everyone in the Village. Adult, Youth and Business Questionnaires were distributed to all households and businesses in August 2004, providing everyone in the village with an opportunity to voice their views and concerns about a wide range of topics many of which are to be covered within the Local Development Framework exercise. Numerous service providers were consulted in the compilation of the questionnaires including various departments of Blaby D.C. Over 600 Questionnaires (>40% of the village population) were collected throughout September and the information entered on line into the Rural Community Council’s database,</p>

		<p>where the results were available for future analysis and reference. The Parish Plan Report is currently at the printers and intended for a February 2005 launch. Blaby D.C. as one of the key service providers/partners are to be sent a copy of the report in early January prior to the official launch.</p> <p>Whilst the planning department will no doubt receive a copy of the Croft Parish Plan Report via the normal channels, the Parish Plan Group also hold a spreadsheet/database of responses to the questionnaires. The data held in this database we think would be of great use to you as an input to the Local Development Framework giving a view of what people living in Croft think.</p> <p>If we can assist would any of the following be of use:</p> <ul style="list-style-type: none"> • Copy of Adult, Youth and business Questionnaires. • Excel worksheets of collated results for all questions. • Parish Plan Report. • Parish Plan Report Action Plan.
110.	Wheatcroft & Son	<p>We are seeking an alteration to the end date for the proposed LDF to 2021, this would allow for an increase in the overall provision of housing within the plan period and we are also seeking reconsideration of the existing figures put forward within the Issues Paper. In addition to this we are advocating a number of smaller sites for development adjacent to the urban edge of Leicester within Glen Parva and another small site within the Central Leicester Policy Area at Huncote, all of these for residential development. If the Council require any further information on any of the matters raised within this representation, please do not hesitate to request further information.</p>
111.	Taylor Woodrow Strategic Developments.	<p><u>Plan Period</u></p> <p>Whilst it would normally be sensible for an LDF to cover the period of an emerging Structure Plan, we note that, in this case, this will not provide the required minimum 10 year supply of housing land.</p> <p>Para. 6.8 of PPG12 'Development Plans' states that, in order to ensure that policies and proposals in Local Plans and UDP's extend for a</p>

	<p>reasonable period beyond their adoption, the duration of a Local Plan should be for a period of 10 years from the Plan's forecast date of adoption.</p> <p>The importance of this 10 year supply of housing land has been emphasised in recent Ministerial statements in the House of Commons.</p> <p>A news release from the Office of the Deputy Prime Minister dated 17th July 2003 confirmed that Keith Hill MP had made a written Parliamentary Statement concerning the planning system's role in providing sufficient and better designed homes to meet the variety of housing needs in England and clarifying aspects of PPG3. The intention was to remove barriers to delivering housing and to ensure that the planning system is not a brake on an adequate and continuing supply of sites for housing in sustainable locations.</p> <p>The statement said that Local Authorities should enable the provision of sufficient homes in the right place at the right time, and avoid arbitrary phasing of new development. They should provide at least a 10 year potential supply of housing, put un-needed employment sites back into use through actively considering residential development, promote sustainable residential environments, be flexible on car parking statements, improve the contribution development makes to securing affordable homes and ensure the size and type of housing better matches need.</p> <p><u>Suggested Timescale for Blaby Local Development Framework</u></p> <p>It is unlikely that this review of the Blaby Local Plan will be adopted before 2007 and possibly 2008. As such, a 10 year supply of housing land would require the Plan to provide for the housing needs of the District to 2017 or 2018. Adoption of an end date of 2016 will not achieve this.</p> <p>RPG8 provides guidance for the region to 2021, with the housing requirement over the Plan period 2001 – 2021 remaining constant at 3,150 dwellings per year for Leicestershire.</p> <p>If we assume that the distribution of this housing remains the same, the housing requirement for Blaby District to 2021 can be calculated at 4650 dwellings between 1996 and 2016 and a further 1165 dwellings for the period 2016 – 2021, giving an overall requirement of 5815 dwellings</p>
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		<p>for the period 1996 – 2021. This, we believe, is the housing requirement which should be provided for.</p> <p><u>A Realistic View of Housing Land Supply</u> There is a need for any plan to take a realistic view of housing land supply. The housing requirement is a statement of the dwellings needed to be completed over the Plan period and not merely the number of housing plots to be identified. With this in mind, it is essential that dwellings can, and will actually, be built, otherwise the Plan will not achieve its strategic requirement.</p> <p>Past research on behalf of the Department of the Environment has found that Housing Land Availability Studies tend to over-estimate the contribution of identified sites. The number of completions on identified sites tends to be less than anticipated. The rate of development is slower than expected. Some sites, due to ownership, marketability and infrastructure problems are slower to come forward than expected. Due to this some 'slippage allowance' or 'flexibility factor' needs to be built into the figures. A flexibility of 10% is often applied and we would suggest such a figure in this case. The Issues Paper sets out, at para. 8.2, the current housing land supply position for Blaby. We believe that this should be amended as follows:-</p> <p>Housing requirements 1996 – 2021 5,815 Completions 1996 – 2004 2,830 Still to find 2,985 Commitments at April 2004 1,165 Less 10% flexibility allowance 117 Commitments with flexibility allowance applied 1,048 Allocations in current Local Plan 10 Balance of housing still to be found 1,927 Plus 10% flexibility allowance 193 Balance to be provided for</p>
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		<p>2,120</p> <p>From the above analysis we would conclude that the Plan needs to provide for approximately 2,100 dwelling plots, if an appropriate supply of housing land is to be provided in line with the requirements of Planning Policy Guidance and Ministerial Statements.</p>
112.	Campaign for Dark Skies	<p>Introduction</p> <p>The issue of light pollution and light nuisance is a relatively new and growing phenomenon to attract interest from legal scholars and the government. Although astronomers have been particularly active in highlighting the problems of light polluting the night-time sky (which has been subject to review), it will be shown that it is not just astronomers who have been affected. As a result, DEFRA has put forward a proposal to make light subject to statutory nuisance in the <i>Clean Neighbourhoods</i> Bill. Here it is proposed that “artificial light emitted from premises so as to be prejudicial to health or a nuisance;” will be covered (s. 102 (2)). In the light of this it is suggested that lighting should be addressed at the planning stage, so as to reduce (or remove where possible) light pollution and nuisance. It is noted that Blaby mentions light pollution in its current plan, but some improvements as to how it can better reduce light pollution and nuisance will be suggested.</p> <p>Despite recent legal interest, light pollution and nuisance has yet to receive a formal legal definition, but the author suggests the following: <i>‘every form of artificial light which shines outside the areas it is intended to illuminate, including light which is directed above the horizontal into the night time sky, or which creates glare, or other nuisance’</i>. There are two types of problem which can be caused by lighting. Firstly, light pollution, and secondly light nuisance, caused by glare, both are caused by light not going only to where it is required.</p> <p>Light Pollution</p> <p>Sky glow, or light pollution, is the yellow/orange halo that surrounds all cities and towns when viewed from a distance of a few miles. This glow is caused by upward light illuminating water vapour and other aerosols in the air, obliterating the night sky in the process. Evidence that light pollution is getting worse is shown by satellite images that show the levels of light escaping</p>

		<p>upwards. Most of this glow is due to poorly angled/unbaffled lighting, while the glow also represents wasted energy. However, any type of poor lighting may give rise to light pollution, for example poorly angled floodlights, both domestic and commercial, which are used to illuminate back gardens, commercial premises and car parks at nights. Other lights upwardly illuminate historic buildings such as Churches and other buildings such as pubs, where a great deal of light generally misses the building and goes into the sky. Such floodlighting is almost always left on all night. Skybeams which are used as a form of advertising, are also a source of light pollution, no matter how temporary they may be, for here light is deliberately shone into the night sky.</p> <p>Light Nuisances</p> <p>Light can cause a nuisance via a broad spectrum of problems far wider than harm to the astronomical community. Poor lighting may give rise to nuisances to the public in a number of ways, such as where badly angled floodlighting sends glare towards properties; this can also affect sleep and has even been linked to breast and colorectal cancers in humans. 24 hour lighting has, it has been alleged, been used as a form of ill treatment on prisoners at Guantanamo Bay. There is also one documented case of death caused at least in part by badly angled floodlighting. Although domestic lights are not normally going to be covered as development, the issues of glare and safety are even more important to the brighter floodlights used by business premises. The glare caused by a 500 watt domestic floodlight is easily seen when the light is angled outwards, rather than fully downwards. Despite the claims made for the “security” such lights are supposed to create, at 90 degrees (horizontal), a would-be burglar is completely hidden underneath the light, due to severe glare. At 45 degrees, (which is about the angle of fitting for most of these lights), the would-be burglar is only barely visible (and certainly not identifiable). The view is spoilt by the glare from the light. It is not until zero degrees, i.e. when the light is angled fully downwards that the burglar is fully visible without glare interfering with the view. Until that point the light does more to conceal rather than reveal</p>
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		<p>the would-be burglar.</p> <p>Furthermore, such light can cause both general and some quite specific problems for wildlife, for example, bats and birds. The 'Ecology of the Night' Symposium, was devoted to addressing the negative effects of night time lighting on animals. It is also clear that if light is not needed, or the lighting level exceeds what is required, it will also be wasting energy and so damaging the environment by needlessly increasing CO2 levels and other pollutants produced in the course of energy generation such as SO2. This is an important point to bear in mind, considering the Kyoto accord on the reduction in CO2 levels. The cardinal question is, of course, what level of light is truly needed? It is contended that the time has come to recognise, then to reduce by legislation, all of the deleterious effects of light.</p> <p>Blaby's Role</p> <p>Blaby does not expressly mention light pollution in the wording of the current Local Plan Policy, but it does mention "unnecessary levels of lighting or light spillage" (CE26). Light pollution is however, mentioned in paragraphs of interpretation 9.84 – 9.86. Whilst this is to be commended, the following case study shows that these provisions have failed to tackle a major source of light pollution.</p> <p>I was among a number of persons who complained about the Co-Op Superstore, Station Road, Glenfield, which had fitted 24 floodlights which were left on to illuminate an empty car park all night long. (The lights were angled at about 45 degrees from the horizontal and so emitted a significant amount of waste light into the night sky all night long for the apparent purpose of floodlighting an empty car park). The image below shows the lights which were set up, and the light pollution and glare they create. The lights had been erected without planning permission, and retrospective permission was sought after the complaints were made (03/1239/1/PY). Planning permission was granted on the understanding that the lights were shielded, and used only during trading and delivery hours. These lights have been fitted with vertical louvers which prevent the sideways spillage of light. However, no steps have been taken to prevent the spillage of waste light into</p>
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	<p>the night sky by way of light pollution (such as by requiring shielding to the top of the lights). Moreover, I have not seen re-angled lights along the side shown in the photograph. A colleague in the Campaign for Dark Skies was informed that nothing more could be done about the lights as “it was concluded that the lights would not be of nuisance to residents or road users; create unnecessary levels of lighting or light spillage or be significantly out of keeping with the character or appearance of the area. The development was in compliance with the policy...”. It must be stated that the night sky is not just there for astronomers, and as such light pollution is a nuisance to all citizens of Blaby.</p> <p>In addition reference was made to the Institute of Lighting Engineers and the Chartered Institution of Building Services Engineers guidance, and “the average lux levels in <i>most cases</i> were below this standard” (emphasis added). Firstly, it must be queried why none of the lights that did not meet the levels in question have been shielded or re-angled. Moreover, the Institute of Lighting Engineers is rewriting its guidelines, partly to deal with excessive light pollution like this and I request that you contact them to determine when the new guidelines will be available.</p> <p>I believe that this case study shows that either the existing policy is unable to deal with major forms of light pollution and so should be re-written, or the policy should be re-interpreted. The photograph shows that the lights from the case study clearly show a high level of light pollution and so wasted light, or wasted energy. It is proposed that the Council has the opportunity to tighten the wording requiring the use of floodlighting to be both more energy efficient and well shielded. Perhaps all new floodlighting schemes should install shields above lights so as to prevent light pollution and maximise the light levels where the light is required, the ground. The Government and local authorities are keen to cut energy consumption and the better regulation of lighting is one way. I believe that your imposition of a curfew in the case study is a very good idea, and that such curfews will help to reduce energy consumption and light pollution/nuisance. Perhaps this could be written into the policy document.</p>
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		<p>I am grateful that Blaby is concerned about light pollution and nuisance, however I believe there is work to do to ensure that the existing policy is brought into a form that will adequately do the job required of it.</p> <p>If you require any enhancement on any of this, I would be more than willing to provide whatever advice I can and I can be contacted at mart@dmu.ac.uk or on (0116) 2577191 during office hours.</p>
113.	Gordon Smith Associates.	No answer.
114.	Revelan Group (Gough Planning Services).	No answer.

Summary

A wide variety of issues other than those referred to in the original Issues Paper were suggested. Issues that were felt appropriate for inclusion in the Local Development Framework were: Lighting and light pollution; rights of way improvements; traffic noise; young persons facilities; equestrian facilities; air pollution; shops in rural areas; telecommunications; Development of Rural Centres; Policies for freight transfer; Commuted sums and Landscape Character Assessment. Air pollution and transport were the two issues that generated the most comment. This cross section of suggestions highlights the dilemma of addressing people's concerns whilst attempting to produce a streamlined Local Development Framework.

Two respondents submitted comments that the time period for the LDF should be extended from 2016 to 2021, with a consequent increase in housing requirement.