



22 April 2021
Ref: SA/NP/210422

Planning Policy
North West Leicestershire District Council
Council Offices
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LE67 3FJ

Redrow Homes East Midlands

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Dear Sirs,

RE: Hugglescote and Donington le Heath Neighbourhood Plan Consultation

The comments below are made in response to the consultation on the Hugglescote and Donington le Heath Neighbourhood Plan. In particular Redrow wish to comment on Policy H1: Housing Mix, repeated below for ease of reference:

New housing development proposals should provide a mixture of housing types specifically to meet the latest assessment of identified local needs in Hugglescote and Donington le Heath. Applications for single person accommodation (1 bed); small family homes (2 or 3 bedrooms) or homes suitable for older people will be supported. Larger homes (4 or more bedrooms) can feature in the mix of housing but will be expected to provide a minority of the total.

Policy H1 specifies that new housing proposals should provide a mix of housing types to meet the latest assessment of identified local needs in Hugglescote and Donington le Heath. The policy then goes on to state that larger homes will be expected to provide a minority of the total.

The stipulation in relation to larger homes reflects the recommended mix for North West Leicestershire District outlined in the 2017 Housing and Economic Development Needs Assessment (HEDNA). However, this does not provide sufficient flexibility should any later assessment of identified local needs, either in the District as a whole or specifically in Hugglescote and Donington le Heath, evidence the need for a different housing mix. In this regard, it is understood that a revised HEDNA has been commissioned by the Leicester and Leicestershire authorities as part of work on the Strategic Growth Plan and this will form the most up to date evidence in respect of future housing requirements across the District. Policy H1 pre-empts the findings of the new study by specifically stipulating that larger homes will be expected to provide a minority of the total.

The policy thus provides an unclear and potentially confusing/conflicting set of preconditions to potential applicants. There is no guidance as to the actual proportions of the preferred mix although, that said, Redrow Homes would strongly caution against the use of any prescriptive housing mix policy which is likely to quickly become out of date. If the policy continues to be based on the recommendations within the 2017 HEDNA, it is likely that the policy would still be used by decision makers in 5-10 years' time meaning the evidence that underpins the policy would be 9-14 years old. As drafted, Policy H1 could therefore likely lead to an out-of-date housing mix being requested over time, causing friction with house-builders and ultimately impacting upon housing delivery and deliver a housing stock that doesn't adequately reflect need throughout the plan period.

Any proposed policy on housing mix policy should also be sufficiently flexible to allow market signals to be taken into account at the point at which a decision is made.

It is noted that Policy H6 (House Types and Mix) of the North West Leicestershire Local Plan provides similar guidance in relation to housing mix (without the strict prescription of housing mix). It is suggested that it would be more appropriate for the Neighbourhood Plan to simply cross-reference to Policy H6 of the Local Plan which allows for the most up to date evidence on housing need to be taken into account.

Finally, in relation to Policy H1 it is highlighted that the submission of details of the mix of dwellings lies outside the scope of a reserved matters application and is a matter to be determined at the stage of granting planning permission (i.e. the grant of an outline planning permission). There is an array of appeal decisions which confirm that the only mechanisms for controlling the mix of dwellings at the Reserved Matters stage is by a condition on the outline permission, an obligation through a S106 agreement or where it is included in a Design and Access Statement to which the Reserved Matters application should accord. The Parish Council/Neighbourhood Plan Committee and indeed the District Council should be aware of such when responding to and determining Reserved Matters applications. Further, nothing in a neighbourhood plan can have the effect of altering the terms of an extant planning permission. Thus any outline planning permission which already exists, but does not have any mechanism for controlling the mix of dwellings at the Reserved Matters stage cannot be superseded by the Neighbourhood Plan.

We also submit the following comments in relation to Policy G3 (Design), again repeated below for ease of reference:

All commercial and residential developments, including one or more houses, replacement dwellings and extensions should continue to reflect the character and context of existing developments in the Neighbourhood Area. However, contemporary and innovative materials and design will be supported where positive improvement can be robustly demonstrated without detracting from this context.

The following design criteria should be met where appropriate and proportionate to the development:

- a) Adequate attention to orientation for natural light and green technology will be implicit in all design proposals;*

- b) *all development will enhance and reinforce the local character and sense of place of the specific location in which it is situated. All new proposals for developments of more than one unit must illustrate how the character, size density and layout of the proposed site will not cause an adverse negative impact on the local beauty of the countryside;*
- c) *all proposed densities should be concomitant with the surrounding village residential properties and proportionate to the immediate setting;*
- d) *adequate footpaths and cycleways, accessible to people with disabilities, must be provided to connect the new residential development with local facilities, the Bardon employment area and shops in Hugglescote and Coalville;*
- e) *proposals will be encouraged to have regard to the criteria of "Building for Life 12", to include green spaces to accommodate play areas/benches and promote buffer effects on existing housing where appropriate;*
- f) *these design principles recognise the importance of new technologies and product design that will not only help development towards a goal of carbon neutrality, but also help in the unobtrusive evolution of such renewable technology materials, allowing them to seamlessly blend into the character of our villages;*
- g) *development that demonstrates new and innovative green technologies will be supported;*
- h) *housing design within any one development, should not normally be replicated throughout that development. Each development should reflect the diversity of the surrounding village character;*
- i) *chimneys should reflect one of the many styles of the village using brick or other materials that can be seen in the adjacency, chimney pots should be encouraged to maximise decorative finish;*
- j) *gables open to prominent view do not need to be represented with equilibrium, but as with existing village housing the use of odd windows to draw the eye with interest, barge boards or decorative gable boards as part of an accepted design scheme again to link with the village architecture;*
- k) *any dwelling of above average height should be part of a varied scheme. Proportionate, and sympathetic to the topography of the surroundings and not overbearing on the local topography;*
- l) *wherever possible plots should be enclosed by native hedging and where fences are used these must be of a hedgehog friendly design;*
- m) *roads should be of varied surface materials to sit in with the landscape. Stone cobbles sets and gravel tarmac creating a softer focus to the hard standing will be supported where viable and appropriate to do so;*
- n) *adequate off-road parking should be provided as a minimum of two car parking spaces for properties with three bedrooms or less and three car parking spaces for four bedrooms or more, in line with Highways standards;*
- o) *development should incorporate sustainable design and construction techniques to meet high standards for energy and water efficiency, including the use of renewable and low-cost energy technology, solar panels, rainwater harvesters and photovoltaic glass. Larger boundaries to any development to promote or extend the use of nature corridors will be supported;*

- p) all properties of three bedrooms or less should be provided with an electric vehicle charging point. All properties of four or more bedrooms should be provided with at least connections where viable and appropriate to do so;*
- q) development should incorporate, where appropriate, sustainable drainage systems with maintenance regimes to minimise vulnerability to flooding and climate change and ensure that surface water is directed towards the most sustainable outfalls;*
- r) all properties will ensure appropriate provision for the storage of waste and recyclable materials and adequate space for household storage bins; and*
- s) any development proposals within Flood Zones 2 and/or 3 will be subject to a Sequential Test and the Exception Test, where appropriate (in line with the NPPF).*

We note that the criteria is only to be met where appropriate and proportionate to the development but would request that this is further defined to give certainty and clarity to applicants. For example, it should be confirmed that the criteria should only be applied to applications for new planning permission and subsequent Reserved Matters applications. They should not apply to applications to vary existing permissions where this may lead to a conflict within a development. Furthermore, many developments, such as the South East Coalville Development Scheme have a site specific Design Code that has been approved by the District Council. Where a Design Code exists, this should take precedent and negate the need for the development proposals to meet the Design Criteria prescribed in the Neighbourhood Plan in the determination of any application, as again this could lead to conflicts and is confusing for applicants.

In relation to the specific criteria we comment as follows:

a) This criteria requires green technology to be 'implicit in all design proposals'. However 'Green technology' is not defined. Further it may not always be possible/viable to specifically include green technology within a development proposal. The policy as drafted does not allow for such exceptions. Proposed changes to Part L of the UK Building Regulations will implement substantial changes aimed at furthering new residential design towards a net-zero carbon future and thus this element of the policy is not considered necessary.

In any case point g) of Policy G3 states that development that demonstrates new and innovative green technologies will be supported. The need for green technology to be implicit in all design proposals should therefore be deleted from point a).

f) This is simply a statement and should be removed or put in the supporting text to the policy – it offers no guidance to applicants.

h) It is unclear what this element of the policy is trying to achieve. Many housebuilders will use a selection of housetypes across a development but the same housetype will be used several times. This does not prevent a development reflecting the local area or resulting in a high quality and interesting development. In fact it offers cohesion and consistency throughout the development. This point of the policy should therefore be deleted.

k) The term 'above average height' needs to be defined.

m) The surfacing of roads will be dictated by the highways standard for adoption. The strict requirement for specific materials such as stone cobble sets and gravel tarmac could lead to a conflict between the Neighbourhood Plan and the highway authority and should therefore be deleted.

n) It would be more appropriate for the Neighbourhood Plan to simply reference the locally adopted highway standards. If these were to change in the future this would prevent any conflict with the Neighbourhood Plan

o) As noted above, proposed changes to Part L of the UK Building Regulations will implement substantial changes aimed at furthering new residential design towards a net-zero carbon future. Implementing such changes through building regulations provides certainty and consistency across developments. This element of the policy is therefore not considered necessary. In any case the policy requires all developments to incorporate the use of renewable and low-cost energy technology that may not always be possible.

p) It may not always be possible to provide electric vehicle charging points for all properties. This policy should therefore be re-wording to seek the inclusion of electric vehicle charging points where possible. The need for two connections for properties of four or more bedrooms is considered excessive and unjustified.

We trust the above provides useful clarification in relation to proposed Policy H1 and G3 of the Hugglescote and Donington le Heath Neighbourhood Plan. If you have any questions on any matters raised, please do not hesitate to contact me.

Yours faithfully

Sarah Allsop BSc (Hons) MSc MRTPI
Planning Manager



Ref:

(For official use only)

HUGGLESCOTE AND DONINGTON LE HEATH NEIGHBOURHOOD PLAN

Submission Consultation – Response Form

Hugglescote and Donington le Heath Parish Council have submitted the Hugglescote and Donington le Heath Neighbourhood Plan to North West Leicestershire District Council. In accordance with Section 16 of the Neighbourhood Planning (General) Regulations 2012*, we are now consulting on the neighbourhood plan, and would like your comments. The consultation period will run for six weeks from Friday 12 March until the end of Friday 23 April 2021.

The submission plan and supporting documents can be viewed at https://www.nwleics.gov.uk/pages/hugglescote_neighbourhood_plan

You can make representations to the Neighbourhood Plan by completing the form below and emailing it to planning.policy@nwleicestershire.gov.uk or posting it to Planning Policy, North West Leicestershire District Council, Council Offices, Whitwick Road, Coalville LE67 3FJ.

All responses must be received by the District Council by the **end of 23 April 2021**.

*Including amendment regulations; The Neighbourhood Planning (General) (Amendment) Regulations 2015 and The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016.

PART A – Personal Details

If you are responding on behalf of yourself, or your own organisation, please fill in all the 'Personal Details' fields. If an agent is appointed, please complete only the Title, Name and Organisation boxes in the Personal Details column, but complete all the 'Agent's Details' fields.

	Personal Details	Agent's Details (if applicable)
Title	Miss	
First Name	Sarah	
Last Name	Allsop	
Job Title (where relevant)	Planning Manager	
Organisation (where relevant)	Redrow Homes East Midlands	
Address Line 1	Redrow House	
Address Line 2	Arundel Avenue	
Address Line 3	Castle Donington	
Address Line 4	Derby	
Postcode	DE74 2HJ	
Telephone	01332 818 300	
Email address	████████████████████	

Do you wish to be notified of the Council's decision on the Neighbourhood Plan proposal?

Yes

No

PART B – Your Representation

In the left column below, please state which part of the Neighbourhood Plan your representation relates to (for example which section, page or policy). In the right column, please submit your comments.

You can comment on as many different parts of the Neighbourhood Plan as you wish (please add more lines if required).

Section, page or Policy (please specify for each comment)	Comments
Policy H1	See attached letter
Policy G3	See attached letter

Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publically available and may be identifiable to my name / organisation.

I acknowledge that I have read and accept the information and terms specified under the Data Protection and Freedom of Information Statement.

Signed: S Allsop

Date: 22 April 2021

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act. It will be used only for the preparation of the Hugglescote and Donington le Heath Neighbourhood Plan as required by the Neighbourhood Planning (General) Regulations 2012*, save for requests of such information required by way of enactment. Your name, organisation and representations will be made publicly available when displaying and reporting the outcome of this statutory consultation stage, and cannot be treated as confidential. Other details, including your address and signature, will be treated as confidential.

You should not include any personal information in your comments that you would not wish to be made publicly available.

*Including amendment regulations; The Neighbourhood Planning (General) (Amendment) Regulations 2015 and The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016.

Please send completed forms to planning.policy@nwleicestershire.gov.uk or Planning Policy Team, NWLDC, Council Offices, Whitwick Road, Coalville LE67 3FJ

The deadline for responses is the end of Friday 23 April 2021