

Hugglescote & Donington le Heath Parish Council

Clerk: Simon Weaver, c/o 71 Main Street, Thringstone, Leicester LE67 8ND
(tel: 01530 222348) (e.mail: clerk@huggdonpc.org.uk)

Website: huggdonpc.org.uk

November 2019

Dear Sir / Madam

Neighbourhood Plan for Hugglescote & Donington Le Heath Regulation 14 Consultation Pre Submission Draft

The Parish Council is producing a Neighbourhood Plan for the parish area. The purpose of this letter is to seek representations from Statutory Consultees and other Stakeholders and interested parties as part of the process of finalising the content of the Pre-submission Draft Plan.

You are invited to read the Plan and make comments prior to the document being finalised. There will be a six week period to do this, commencing on **6 November 2019** and closing on **18 December 2019**.

The plan **attached** and supplementary documents can be accessed via the Parish Council's website at: <https://www.huggdonpc.org.uk>

Your comments will influence our final draft before it is submitted to North West Leicestershire DC, at which point there will be a further opportunity for you to comment when the Neighbourhood Plan is published prior to Independent Examination.

If you wish to comment on the Draft Plan you can do this by using the Pre-Submission Comments Form **attached** or via the web site and returned;

By email to: clerk@huggdonpc.org.uk or in writing to:

Simon Weaver c/o 71 Main Street Thringstone Leicestershire LE67 8ND

All responses received by the above date will be considered and may be utilised to amend the Draft Neighbourhood Plan. Details of all relevant documentation are accessible via the website:

Should you require any further help or clarification, please contact myself at the above address or email: clerk@huggdonpc.org.uk

Thank you for your help and assistance and we look forward to hearing from you

Yours faithfully

Simon Weaver

Simon Weaver
Clerk to the Parish Council

Hugglescote & Donington Le Heath

Neighbourhood Plan

**Pre submission consultation
November – December 2019**

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Ellistown PC

Respondent KarenTurrell

No.	Chapter/ Section	Policy Number	Comment	Response	Amendment
1	Page 19	G2 b	What signage, where is it to be positioned and will this signage send unwanted traffic into Ellistown?	<p>Thank you for this comment.</p> <p>The policy seeks to minimise the traffic flow from this major development through the village. It does not specify where the traffic should go, in the same way that the Ellistown Neighbourhood Plan Policy S3 b) seeks to direct traffic away from Ellistown.</p>	None

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Natural England

Respondent Alice Watson

Consultations Team

No.	Chapter/ Section	Policy Number	Comment	Response	Amendment
		General Points made	No Specific Comments on this draft plan	Noted	None

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The Coal Authority

Respondent Melanie Lindsley

Development Team Leader (Planning)

No.	Chapter/ Section	Policy Number	Comment	Response	Amendment
			<p>The Coal Authority is a non-departmental public body which works to protect the public and the environment in coal mining areas. Our statutory role in the planning system is to provide advice about new development in the coalfield areas and also protect coal resources from unnecessary sterilisation by encouraging their extraction, where practical, prior to the permanent surface development commencing.</p> <p>As you will be aware the Neighbourhood Plan area lies within the current defined coalfield.</p> <p>According to the Coal Authority Development High Risk Area Plans, there are recorded risks from past coal mining activity in the area. However, the Neighbourhood Plan does not propose to allocate any sites for future development and therefore we have no specific comments to make.</p>	Noted	None

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Historic England

Respondent Clive Fletcher

Principal Adviser, Historic Places
 clive.fletcher@HistoricEngland.org.uk

No.	Chapter/ Section	Policy Number	Comment	Response	Amendment
			<p>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.</p> <p>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.</p> <p>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:-</p>	Noted	None

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			<p><https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/></p> <p>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:</p> <p><http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf></p> <p>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/></p>		
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The Environment Agency

Respondent Nick Wakefield

No.	Chapter/ Section	Policy Number	Comment	Response	Amendment
	Section 2	General Points	Whilst the majority of the Limited to development (Area) do not contain environmental constraints for which the Environment Agency (EA) has a statutory remit, we note that there are elements of flood zone to the South of the (Area) (associated with the 'Main River' Sence and an ordinary watercourse). Any proposals for land within Flood Zones 2 and/or 3 must be deemed have passed the flooding Sequential Test and will be subject to the Exception Test, where appropriate (in line with the NPPF). Any works within 8m of a Main River may require a Permit to be issued by the EA.	Noted – we will add a requirement for a sequential test to Policy G3	'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)'.

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The Highways Agency

Respondent Scarlett Griffiths
 Spatial Planning and Economic Development Team

No.	Chapter/ Section	Policy Number	Comment	Response	Amendment
		General Points	<p>Highways England 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 the Hugglescote and Donington le Heath Neighbourhood Plan, Highways England's principal interest is in safeguarding the M1 and A42 which route approximately 4km east and 6km west from the plan area respectively.</p> <p>We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Hugglescote and Donington le Heath is required to be in conformity with the existing and emerging North West Leicestershire District Council (NWLDC) Local Plan (2011 to 2031) and this is acknowledged within the document.</p> <p>The plan acknowledges that North West Leicestershire District Council made a 'resolution to grant planning permission' for a number of sites collectively known as South East Coalville Development Scheme. The permitted scheme overlaps the area of the Hugglescote and Donington le Heath neighbourhood plan, with 2,700 dwellings out of the 3,500 total dwellings located in the parish. Of these, 1900 are expected to be constructed during the plan period</p>	Noted	None

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			<p>In line with the adopted NWLDC Local Plan, the Neighbourhood Plan for Hugglescote and Donington le Heath does not require provision of any additional residential units during the plan period other than through Windfall development. Policy H3 explains proposed windfall sites will be limited to a maximum of 5 dwellings in order not to worsen existing congestion issues in the area.</p> <p>The plan also aims to support existing employment opportunities (Policy E1) and new small-scale employment (Policy E2), provided that it avoids harmful impacts.</p> <p>We also note and welcome the inclusion of Policy T1 for the provision of Transport Assessments for new housing developments, to demonstrate that they will not have a severe impact on the highway network.</p> <p>We support these policies and note that, due to the limited scale of the growth proposed in addition to the already committed developments, we do not expect that there will be any impacts on the operation of the SRN.</p> <p>We have no further comments to provide and trust the above is useful in the progression of the Hugglescote and Donington le Heath Neighbourhood Plan</p>		
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Severn Trent

Respondent Chris Bramley
Strategic Catchment Planner

No.	Chapter/ Section	Policy Number	Comment	Response	Amendment
	Section 2	<p>General Points</p> <p>Policy G2:</p>	<p>Thank you for the opportunity to comment on your consultation. Severn Trent are generally supportive of the Neighbourhood Plan, there are however a few points that we feel would benefit from minor amendments</p> <p>South East Coalville Development Scheme It is noted that bullet point d highlights the need to minimise the impacts of the surrounding landscape and highlights trees and hedges as aspects that need to be protected. Severn Trent do not object to the protection of these features, but would highlight that the South East Coalville development scheme is intersected by a number of watercourses. It is important that these watercourses are retained as open features within areas of open space to ensure that:</p> <ul style="list-style-type: none"> • Water can be conveyed through the watercourses without increasing flood risk • Surface water flows can be directed to sustainable outfalls such as watercourses • Biodiversity and ecology is not damaged by the removal, enclosure or diversion of the watercourse <p>Severn Trent utilise water as a resource and see the benefits of protecting this natural resources, Improving water quality throughout the water system helps to meet the Water Framework Directive (WFD) requirements and has the potential to minimise the amount of treatment needed to bring water to drinking standards when extracted. The use of the Drainage Hierarchy, detailed in our response to policy G3 is also important, by keeping surface water out of the sewerage system prevents us treating water that would not require treatment at the Wastewater Treatment Works (WwTW).</p>	<p>Agreed – Policy G2 to be amended in line with recommendation.</p>	<p>Criterion f to be added ‘High quality design and layouts will be expected to minimise the impact on flood risk and biodiversity by ensuring that where possible all watercourses (including ditches) are retained in areas of public open space, and that opportunities for sustainable surface water connections to the watercourse are not restricted.’</p>

		<p>G3</p>	<p>Therefore the implementation of the above approach supports NPPF requirements for sustainable development. Severn Trent therefore recommend that an additional bullet point is added to ensure that watercourses are protected. <i>High quality design and layouts will be expected to minimise the impact on flood risk and biodiversity by ensuring that where possible all watercourses (including ditches) are retained in areas of public open space, and that opportunities for sustainable surface water connections to the watercourse are not restricted.</i></p> <p>Design It is noted that this policy includes a reference to the inclusion of Sustainable Drainage Systems (SuDS), Severn Trent are supportive of SuDS and their use within new developments. It is however also important that surface water is directed towards the most sustainable outfalls. Severn Trent therefore recommend that bullet points also reference the Drainage.</p> <p>The Drainage Hierarchy is supported in Planning Practice Guidance (paragraph 80) and part H of Building Regulations, whilst it is understood that planning cannot be used to enforce building regulations, it is important that the drainage hierarchy is promoted at the design stage. The usage of the drainage Hierarchy also supports the need to protect watercourses as outlined under our comments regarding Policy G2.</p>	<p>Agreed – policy G3 s) to be amended as indicated.</p>	<p>‘...and ensure that surface water is directed towards the most sustainable outfalls’.</p>
		<p>H4</p>	<p>Support to be given to Brownfield sites Severn Trent understand the need for Brownfield development, and that there are additional constraints when proceeding with Brownfield development. We would however note that sewerage design has changed since some of these sites were originally developed. Sewer design best practice is that surface water is designed as a separate system where possible. When re-developing Brownfield sites this approach should also be promoted as it creates a more resilient and sustainable sewerage system.</p>	<p>Agreed. Policy to be amended as indicated.</p>	<p>‘...sewer design best practice should be followed with surface water designed as a separate system where possible’.</p>
		<p>ENV 1:</p>			

		<p>ENV2</p>	<p>Protection of Local Green Spaces Severn Trent are understand and a generally supportive of the need to protect green spaces. We would however note that there can be flood alleviation benefits through the development of flooding solutions within green spaces. It is important that policies of green spaces are not worded such that flood alleviation works would be prevented. Severn Trent would therefore recommend that the policy includes the following statement:</p> <p><i>Proposals for flood alleviation works within Local Green Spaces will be supported provided that they do not have an adverse impact on the primary function of the Local Green Space.</i></p> <p>There have been a number of cases where flood alleviation scheme carried out in areas of open space have resulted in additional biodiversity and amenity benefits for the open spaces as well as the primary flood alleviation benefits.</p>	<p>Noted – however the purpose of the policy is to restrict development in areas regarded locally as special. We believe that the policy as it stands is sufficient and appropriate.</p>	<p>None</p>
		<p>ENV3</p>	<p>Protection of Sites of Environmental Significance Severn Trent appreciated that these sites may be subject to tighter constraints in relation to protecting the specific environmental that is important, however in the same way flood alleviation schemes can benefit open spaces the same is true of Sites of Environmental Significance. Severn Trent would therefore recommend that the policy includes the following statement:</p> <p><i>Proposals for flood alleviation works within sites of Environmental or Historical significance will generally be supported provided that they do not have any adverse impacts on the environmental or historical significance of the site.</i></p>	<p>As above. We consider the policy as written to be sufficiently comprehensive and the issue raised is covered appropriately by the policy.</p>	<p>None</p>

			<p>Important Open Spaces Severn Trent are understand and a generally supportive of the need to protect open spaces. We would however note that there can be flood alleviation benefits through the development of flooding solutions within green spaces. It is important that policies of green spaces are not worded such that flood alleviation works would be prevented. Severn Trent would therefore recommend that the policy includes the following statement:</p> <p><i>Proposals for flood alleviation works within Local Green Spaces will be supported provided that they do not have an adverse impact on the primary function of the Open Space.</i></p> <p>There have been a number of cases where flood alleviation scheme carried out in areas of open space have resulted in additional biodiversity and amenity benefits for the open spaces as well as the primary flood alleviation benefits. Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice. For your information we have set out some general guidelines that may be useful to you.</p>		
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Severn Trent continued

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 of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

Sewage Strategy



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Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

Surface Water and Sewer Flooding

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website <https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

Water Quality

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

Water Supply

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.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

Water Efficiency

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you 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 or less.

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- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

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

Yours sincerely Chris Bramley Strategic Catchment Planner growth.development@severntrent.co.uk

Severn Trent continued

No.	Chapter/ Section	Policy Number	Comment	Response	Amendment
			<p>Position Statement above</p> <p>Sewage Strategy</p> <p>Surface Water and Sewer Flooding</p> <p>Water Quality</p> <p>Water Supply</p> <p>Water Efficiency</p>	Noted	None

Haworth Group
Respondent Pegasus Group

1. INTRODUCTION

- 1.1 The Hugglescote and Donington le Heath Parish Neighbourhood Plan (HDLHNP) 2019-2031 (Pre-Submission Draft Version) has been prepared under the neighbourhood planning regime established through the Localism Act and the National Planning Policy Framework (NPPF). It is an ambitious document that will inform and guide decision making in the Parish of Hugglescote and Donington le Heath until 2031. It will form part of the Development Plan, requiring planning applications to be determined in accordance with the Neighbourhood Plan policies unless material considerations indicate otherwise; awarding it the same status as Local Plans in decision making.
- 1.2 It is a requirement that the Neighbourhood Plan must meet the Basic Conditions as set out in the Localism Act 2011. These are that the HDLHNP must:
- Have regard to the national policies and advice contained in guidance issued by the Secretary of State;
 - Contribute to the achievement of sustainable development;
 - Be in general conformity with the strategic policies of the development plan for the area (North West Leicestershire Local Plan adopted November 2017); and
 - Be compatible with the European Union and European Convention on Human Rights obligations
- 1.3 These submissions are made on behalf of Harworth Group Plc, one of the largest land and property regeneration companies in the UK, and the owner of the land associated with the South East Coalville Sustainable Urban Extension (SUE), in particular land associated with Phases A1, A2, A3 and E1 of the SUE which fall within the designated neighbourhood plan area. It is of note that the South East Coalville SUE falls within both Hugglescote and Donington le Heath Parish Council, and Ellistown and Battleflat Parish Council.
- 1.4 The SE Coalville SUE proposals have outline planning permission, which was granted on 26 September 2016 under reference 13/00956/OUTM (see Appendix 1 for the extent of SE Coalville SUE). Extensive consultation was carried out before and during the outline planning application with Hugglescote and Donington Le Heath Parish Council. The applicants have also discharged the site wide conditions attached to the decision notice including conditions 5, 7, 8, 11, 16, 26, 27, 30 and 34. Reserved matters applications have been submitted and approved for phases A1, A2, A3, D1, F1 and F2 of the South East Coalville SUE. The reserved matters detail for the enabling works associated with Phases A1, A2 and A3 were approved in July 2019 alongside the works associated with the new roundabout junction on Grange Road.
- 1.5 **We have concerns, as set out below, with the implications of the requirements of Policies G2, G3, H1, H2, ENV2, ENV5, and T2, which would not meet the Basic Conditions. The policy requirements would also subject the South East Coalville SUE development scheme to policy burdens that will threaten the ability to viably develop the proposals and therefore subsequently threaten the neighborhood plan's contribution to the achievement of sustainable development.**
- 1.6 Accordingly, these representations suggest re-wording or deletion where appropriate to ensure that the policies and plan overall is deliverable in accordance with Paragraph 005 (Reference ID: 41-005-20140306) of the Planning Practice Guidance (PPG).

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		<p>mitigation are outlined within the S106/S278 Agreements and relevant conditions attached to the decision notice. In particular, the ‘Coalville Transport Infrastructure Package’ within the signed S278 Agreement for the South East Coalville SUE identifies a number of junctions to be improved that will be funded by the contributions.</p> <p>Accordingly, the contributions to the highways improvement works and the relevant conditions attached to the decisions will mitigate the vehicular impact associated with the developments. In addition, there is now no mechanism to require further highways mitigation measures via financial contributions as the outline planning permission has been granted for the SE Coalville SUE</p> <p>Any additional policy requirements over and above the agreed works would threaten the viability and delivery of the development scheme. Paragraph: 002 Reference ID: 10-002-20190509 PPG outlines that: <i>“The role for viability assessment is primarily at the plan making stage. Viability assessment should not compromise sustainable development but should be used to ensure that policies are realistic, and that the total cumulative cost of all relevant policies will not undermine deliverability of the plan.”</i> (our emphasis).</p> <p>In this respect, placing additional obligations on developers to provide further highways infrastructure, particularly when it is not clear whether this has been justified by robust highways and viability evidence, will provide additional burden that would affect the ability of the South East Coalville development scheme to be developed viably.</p> <p>Accordingly, the wording in criterion (b) should be revised so that the policy is consistent with national policy guidance. It is suggested that the criterion is revised as follows:</p> <p>b) adequate measures are put in place to mitigate the any unacceptable harm caused by any significant increase in traffic through Hugglescote village centre, including signage to direct traffic away from Hugglescote where necessary</p>		
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		<p>G3 Design Cont'd</p>	<p>that the SPD has been guided by the policies within the National Planning Policy Framework (NPPF) and has been adopted by the Council. Accordingly, criterion (l) fails to meet the Basic Conditions as it does not contribute to the achievement of sustainable development and does not comply with national guidance. In addition, it is considered that criterion (m) will provide the necessary requirements to ensure building heights respond to the existing context appropriately, thus criterion (l) is superfluous and should be deleted</p> <p><u>Criterion o</u></p> <p>Criterion (o) restricts the use of surface materials in roads. The use of different materials in roads should be carefully approached as the use of non-standard surface materials only could mean that some roads will not be adopted by Leicestershire County Council. Paragraph 4.1 of the Leicestershire Highways Design Guide states:</p> <p><i>“The standard construction requirements and materials set out in this Part are based on national standards and advice used for constructing and maintaining highways throughout the region. They should normally be applied to all highway works and have been chosen to make sure the highways function safely and that they can be maintained in the most cost-effective way”.</i></p> <p>Paragraph 4.5 of the Leicestershire Highway Design Guide then goes on to state that:</p> <p><i>To recognise and overcome some of the inflexibility that results from using standard materials and so on, we are prepared to allow you to use some alternative materials, landscaping treatment and features. However, if alternative materials and so on are to be used they will</i></p> <p><i>need to be:</i></p> <ul style="list-style-type: none"> • <i>To a BS/EN standard</i> • <i>easy to maintain and replace;</i> • <i>durable;</i> 	<p>Noted. The proposed form of words is acceptable.</p> <p>It should also be noted that both the Highways Agency and the Leicestershire Highways Authority commented on the NP but made no objection to this policy.</p>	<p>Policy G3 o) to change to ‘roads should of varied surface materials to sit within the landscape, stone cobbles sets gravel tarmac creating a softer focus to the hard standing will be supported where viable and appropriate to do so’.</p>
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			<ul style="list-style-type: none"> • <i>safe for purpose;</i> • <i>sustainable;</i> • <i>appropriate to the local character;</i> • <i>durable and suitable for the hierarchy of the road/ footway section and the anticipated traffic/ pedestrian flows;</i> • <i>provide a sustainable solution, including the ability to replace components to maximise the life of the asset;</i> • <i>accord to the principles of Asset Management and provide good “Whole of life” cost value in terms of replacement, serviceability and maintenance regimes</i> • <i>the use of recycled materials will be considered where appropriate; and</i> • <i>supported by a commuted sum to meet the additional costs in maintaining and replacing non-standard assets.”</i> <p>The approach set out in criterion (o) needs to have the support of the highways authority and allow for the use of standard materials on adoptable roads.</p> <p>In addition, the use of non-standard surface materials on adoptable roads will attract a commuted sum by Leicestershire County Council to pay for the maintenance of a non-standard surface material. Accordingly, the restriction to use such materials may render developments unviable and therefore the plan would be undeliverable.</p> <p>It is therefore considered that the criterion would fail the Basic Conditions as the criterion would not comply with national guidance as the viability of the policy has not been tested in line with Paragraph : 002 Reference ID: 10-002-20190509 of the PPG; the criterion is not necessary to contribute to the achievement of sustainable development; and the criterion does not have regard to national policy.</p> <p>It is therefore recommended that criterion o) be deleted or be updated to state: o) roads should of varied surface materials to sit within the</p>		
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		<p>Policy G3 Design Cont'd</p>	<p>landscape, stone cobbles sets gravel tarmac creating a softer focus to the hard standing will be supported where viable and appropriate to do so;</p> <p><u>Criterion r</u></p> <p>It is recommended that criterion r) is revised so that it is in conformity to national guidance. There is no justification provided for this policy requirement, the impact of the policy and the effects on viability through added costs have not been assessed.</p> <p>Criterion r) would burden the delivery of development by going beyond the requirements of national policy. Point e) of paragraph 110 of the National Planning Policy Framework (NPPF) states that applications for development should</p> <p><i>“be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations.”</i> The minimum requirement is therefore to provide the ability to charge plug-in and other ultra-low emission vehicles.</p> <p>Accordingly, if electric charging points were deemed viable and appropriate it is considered that the policy should be reworded for the provision of an electric vehicle charging point connection, in order to allow customer choice of the charging point specification. It is suggested the criterion should be reworded as follows:</p> <p>r) all properties of three bedrooms or less should be provided with at least one “universal” electric vehicle connection to provide an electric vehicle charging point, all properties of four or more bedrooms should be provided with at least two connections “universal” electric vehicle to provide electric vehicle charging points where viable and appropriate to do so;</p> <p>Housing Mix</p>	<p>The proposed rewording is appropriate and accepted.</p> <p>The Parish of Hugglescote and Donington le Heath has exceeded its housing</p>	<p>Policy G3 r) is to be amended to say ‘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 two connections where viable and appropriate to do so’.</p> <p>None</p>
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		<p>Policy H2 Affordable Housing</p>	<p>The policy places a tighter restriction on the provision of larger homes within new development, which conflicts with national planning policy guidance and NWLDC’s adopted Local Plan Policy H6.</p> <p>Paragraph 13 of the NPPF states “Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.” However, Policy H1 is not in general conformity with Policy H6 of the NWLDC adopted Local Plan as it places further burden on applicants without justification in respect of smaller sites (below 10 dwellings) and larger dwellings (4 or more bedrooms).</p> <p>Policy H1 relates to all residential developments even though the Local Plan policy only relates to schemes of 10 or more dwellings, and therefore this requirement could significantly restrict smaller schemes and make them unviable. In addition, the restriction of larger dwellings to be the minority proportion of the housing mix places a further restriction over and above the Local Plan policy H6 and contradicts the latest guidance within the Leicestershire and Leicester Housing and Economic Needs Assessment as referred to in the text preceding Policy H1. The policy therefore does not meet the Basic Conditions and the following revisions are suggested:</p> <p>POLICY H1: HOUSING MIX – New housing development proposals of 10 dwellings or more should provide a mixture of housing types specifically to meet the latest assessment of identified local needs in Hugglescote and Donington le Heath.</p> <p>Applications for 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 on any single site.</p> <p>Affordable Housing</p>	<p>requirement. There is no additional need for housing beyond the sites allocated through the Local Plan. In these circumstances, it is acceptable for Neighbourhood Plans to set locally determined criteria.</p> <p>By saying that the affordable housing should be provided in line with Local Plan requirements,</p>	<p>None</p>
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		<p>This policy provides further restrictions on affordable housing over and above NWLDC’s adopted Local Plan Policy H4 in relation to tenure without any evidence to justify its inclusion and therefore is not in general conformity to the Local Plan and will conflict with national planning guidance</p> <p>Policy H2 outlines that housing developments proposals should provide a tenure split of 80% social and affordable rented homes and 20% low cost starter homes or other home ownership products. Although the policy outlines that affordable housing should be provided in line with Local Plan requirements, it does not distinguish in the second sentence that affordable housing should only relate to schemes of 11 or more dwellings, which also conflicts with paragraph 63 of the NPPF. In addition, the adopted Local Plan policy does not define the tenure split for affordable housing and therefore Policy H2 provides further policy burden that has not been tested by a viability appraisal thus conflicting with Paragraph: 002 Reference ID: 10-002-20190509 of the PPG. The policy therefore does not meet the Basic Conditions and it is suggested that it should be revised as follows so that it complies with national planning guidance and is in general conformity with the strategic policies in the Development Plan:</p> <p>POLICY H2: AFFORDABLE HOUSING– Affordable housing should be provided in line with Local Plan requirements. Housing development proposals of 11 dwellings or more should provide a tenure split of 80% social and affordable rented homes and 20% low cost starter homes or other home ownership products and provide a balance of accommodation, including bungalows, which meets the needs of people of all ages, including older people, subject to monitoring and review.</p> <p>Affordable Housing</p> <p>The affordable units should be integrated within the design and layout of a development such that they are externally indistinguishable from and dispersed throughout the market</p>	<p>the requirement for it to apply to sites of 11+ dwellings is implicit and does not need restating.</p> <p>This does not therefore conflict with the Local Plan.</p> <p>Local Plans are able to add local detail to broad strategic policies. The tenure mix in the NP does this and addresses the fact that in the neighbourhood area social rent products are less than half local authority levels whilst affordable housing for sale products are nearly double District-wide rates. This will be emphasised in the narrative leading to the policy.</p>	
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		<p>ENV 2 Protection of Sites</p>	<p>housing on the same site.</p> <p>Where possible, new affordable housing within the Plan area shall be made available to eligible households with a connection to the Plan area</p> <p>Protection of Sites of Environmental Significance</p> <p>The policy refers to Figure 7.2 which is inaccurate. The disused railway is shown as a Local Wildlife Site when it is a candidate Local Wildlife Site, and therefore the plan should be updated to accurately show candidate and potential Local Wildlife Sites as well as designated Local Wildlife Sites.</p> <p>Ridge & Furrow</p> <p>Although the policy is in line with the intentions of the NPPF, the identification of the non-designated assets is not clear on Figure 11.3. Page 27 of Appendix 6 'A listing of Heritage, Archaeological and items of Historical Interest and Importance in the Parish of Hugglescote and Donington Le Heath', which supports the neighbourhood plan, provides a copy of the Leicestershire County Council Historic Environment Record (HER). However, Figure 11.3 of the neighbourhood plan does not reflect the HER and shows more extensive areas of ridge and furrow. Paragraph: 040 Reference ID: 18a-040-20190723 of the PPG outlines that:</p> <p><i>"There are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on sound evidence."</i></p> <p>It is considered that the neighbourhood plan does not clearly outline</p>	<p>The map is accurate, based on Leicestershire Environmental Records Centre (LERC, Leics CC, dated March 2018) data and mapping (all sites indicated as 'current' have been validated)</p> <p>Due process has been followed in line with the paragraph quoted in italics from the PPG. The 2018-19 survey on which Figure 11.3 is based adds to the Leics.HER data (which is itself a digital version of the 'Turning the Plough' surveys by Historic England et al, which in Hugglescote has now been shown to have missed a small number of occurrences through local fieldwork). Leicestershire CC Environment Section has now supported this approach in some 15 NPs in the County; newly identified/confirmed ridge and furrow is added to the Leics HER after Plans are Made.</p>	<p>None</p> <p>None</p>
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			<p>G3, H1, H2, ENV2, ENV5 and T2. It is necessary for policies to be re-worded or amended to accord with the Basic Conditions.</p> <p>Suggestions of policy re-wording and deletions have been put forward so that the policies have had regard to the policies and guidance within the NPPF and PPG, and the policies are also in general conformity with the policies within the adopted Development Plan.</p> <p>As this is the first opportunity for Harworth Group Plc to comment on the Neighbourhood Plan and due to the significant implications of the policies, Harworth Group would be happy to assist with any further iterations of the policies and would like the opportunity to comment at the Examination.</p>		
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**Extent of South East Coalville
Sustainable Urban Extension**

(map)

Leicestershire County Council

Respondent Nik Green
Policy Officer

No.	Chapter/ Section	Policy Number	Comment	Response	Amendment
		<p>G3 Design</p> <p>G3 Design Highways</p>	<p>Leicestershire County Council is supportive of the Neighbourhood plan process and welcome being included in this consultation. Specific Comments</p> <p>Any proposed highway will need to be in accordance with the LHDG The plan states that adequate footpaths and cycleways, accessible to people with disabilities - must be provided to connect the new residential development with local facilities and shops in Hugglescote and Coalville. <i>This can only be provided when necessary and reasonable.</i></p>	<p>Noted</p> <p>Noted. The policy is prefaced with 'The following design criteria should be met where appropriate and proportionate to the development' so the concerns are addressed.</p>	<p>None</p> <p>None</p>
		<p>G3</p>	<p>Windfall Development</p> <p>Page 25 states: "they provide for a safe vehicular and pedestrian access to the site; "because an access is existing, does not mean it is 'safe' or indeed suitable and any site, whether a 'windfall' site or not, will need to meet appropriate</p>	<p>Noted</p>	<p>None</p>

		<p>design standards.</p> <p>If adequate parking provision is provided, this should make no difference to existing on-street parking. Existing on-street parking is not in itself a reason to resist a new planning application</p> <p>T1</p> <p>Policy T1</p> <p>Transport Assessment for New Housing Developments</p> <p>“a) 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; “ – this is dependent on the scale of the development and the level of assessment as outlined in the LHDG. Capacity assessments will be required where proven to be necessary following consideration of trip distribution.</p> <p>c) improvements to pedestrian and cycle routes are incorporated to serve the development, where appropriate, and to provide safe, convenient and attractive routes to shops, employment, schools and community facilities and which are integrated into wider networks; “ – both dependant on scale of development and whether such works would be reasonable and necessary to permit the development</p> <p>F) travel packs are to be provided on residential developments to encourage sustainable forms of transport and to promote existing pedestrian and cycle routes. (<i>where appropriate, as outlined in the LHDG</i>)</p> <p>T2</p> <p>Residential and Public Car Parking</p> <p>States “POLICY T2: RESIDENTIAL AND PUBLIC CAR PARKING – New residential development should incorporate parking provision in accordance with the Leicestershire</p>	<p>Noted</p> <p>These comments are noted.</p> <p>Noted. Will add in where appropriate.</p>	<p>None</p> <p>None</p> <p>Change to be made where indicated.</p>
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		<p>Highways parking standards except that 4+ bedroomed dwellings shall have a minimum of 4 off-street parking spaces within the curtilage of each dwelling.” <i>(this is not in accordance with the requirements set out in the LHDG and would therefore need a very strong evidencebase)</i></p>	Agreed	The wording will be changed to ensure conformity with Highways standards.
	CF1	<p>Community Facilities and Amenities</p> <p>States “e) will not result in unacceptable traffic movements that generate increased levels of noise, fumes, smell or other harmful disturbance to residential properties including the need for additional parking which cannot be catered for within the curtilage of the property; (<i>“ increase traffic will be assessed by the LHA on capacity, rather than noise, fumes etc ” There may be options from an environment angle that can be referred to for this ?</i>)</p> <p>Doctors Surgery</p> <p>As above forCF1</p>	<p>The role of the LHA is noted. Planning decisions will be made on a broader basis than just the comments from the LHA.</p>	None
			As above	None

LCC General Comments

The County Council recognises that residents may have concerns about traffic conditions in their local area, which they feel may be exacerbated by increased traffic due to population, economic and development growth.

Like very many local authorities, the County Council’s budgets are under severe pressure. It must therefore prioritise where it focuses its reducing resources and increasingly limited funds. In practice, this means that the County Highway Authority (CHA), in general, prioritises its resources on measures that deliver the greatest benefit to Leicestershire’s residents, businesses and road users in terms of road safety, network management and maintenance. Given this, it is likely that highway measures associated with any new development would need to be **fully** funded from third party funding, such as via Section 278 or 106 (S106) developer contributions. I should emphasise that the CHA is generally no longer in a position to accept any financial risk relating to/make good any possible shortfall in developer funding.

To be eligible for S106 contributions proposals must fulfil various legal criteria. Measures must also directly mitigate the impact of the development e.g. they should ensure that the development does not make the existing highway conditions any worse if considered to have a severe residual impact. They cannot unfortunately be sought to address existing problems.

Where potential S106 measures would require future maintenance, which would be paid for from the County Council’s funds, the measures would also need to be assessed against the County Council’s other priorities and as such may not be maintained by the County Council or will require maintenance funding to be provided as a

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In regard to public transport, securing S106 contributions for public transport services will normally focus on larger developments, where there is a more realistic prospect of services being commercially viable once the contributions have stopped ie they would be able to operate without being supported from public funding.

The current financial climate means that the CHA has extremely limited funding available to undertake minor highway improvements. Where there may be the prospect of third-party funding to deliver a scheme, the County Council will still normally expect the scheme to comply with prevailing relevant national and local policies and guidance, both in terms of its justification and its design; the Council will also expect future maintenance costs to be covered by the third-party funding. Where any measures are proposed that would affect speed limits, on-street parking restrictions or other Traffic Regulation Orders (be that to address existing problems or in connection with a development proposal), their implementation would be subject to available resources, the availability of full funding and the satisfactory completion of all necessary Statutory Procedures.

Flood Risk Management

The County Council are fully aware of flooding that has occurred within Leicestershire and its impact on residential properties resulting in concerns relating to new developments. LCC in our role as the Lead Local Flood Authority (LLFA) undertake investigations into flooding, review consent applications to undertake works on ordinary watercourses and carry out enforcement where lack of maintenance or unconsented works has resulted in a flood risk. In April 2015 the LLFA also became a statutory consultee on major planning applications in relation to surface water drainage and have a duty to review planning applications to ensure that the onsite drainage systems are designed in accordance with current legislation and guidance. The LLFA also ensure that flood risk to the site is accounted for when designing a drainage solution.

The LLFA is not able to:

- Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation.
- Use existing flood risk to adjacent land to prevent development.
- Require development to resolve existing flood risk.

When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points:

- Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)).
- Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Watermap).
- Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding.
- How potential SuDS features may be incorporated into the development to enhance the local amenity, water quality and biodiversity of the site as well as manage surface water runoff.
- Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk.

All development will be required to restrict the discharge and retain surface water on site in line with current government policies. This should be undertaken through the use of Sustainable Drainage Systems (SuDS). Appropriate space allocation for SuDS features should be included within development sites when considering the housing density to ensure that the potential site will not limit the ability for good SuDS design to be carried out. Consideration should also be given to blue green corridors and how they could be used to improve the bio-diversity and amenity of new developments, including benefits to surrounding areas.

Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing watercourses and

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land drainage (including water courses that form the site boundary) are retained as open features along their original flow path and are retained in public open space to ensure that access for maintenance can be achieved. This should also be considered when looking at housing densities within the plan to ensure that these features can be retained.

LCC, in its role as LLFA will not support proposals contrary to LCC policies.

For further information it is suggested reference is made to the [National Planning Policy Framework \(March 2012\)](#), [Sustainable drainage systems: Written statement - HCWS161 \(December 2014\)](#) and the [Planning Practice Guidance webpage](#).

Flood risk mapping is readily available for public use at the links below. The LLFA also holds information relating to historic flooding within Leicestershire that can be used to inform development proposals.

Risk of flooding from surface water map:

<https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

Flood map for planning (rivers and sea):

<https://flood-map-for-planning.service.gov.uk/>

Planning

Developer Contributions

If there is no specific policy on Section 106 developer contributions/planning obligations within the draft Neighbourhood Plan, it would be prudent to consider the inclusion of a developer contributions/planning obligations policy, along similar lines to those shown for example in the Adopted North Kilworth NP and the Adopted Great Glen NP albeit adapted to the circumstances of your community. This would in general be consistent with the relevant District Council's local plan or its policy on planning obligations in order to mitigate the impacts of new development and enable appropriate local infrastructure and service provision in accordance with the relevant legislation and regulations, where applicable.

[North Kilworth Adopted Plan](#)

[Great Glen Adopted Plan](#)

Mineral & Waste Planning

The County Council is the Minerals and Waste Planning Authority; this means the council prepares the planning policy for minerals and waste development and also makes decisions on mineral and waste development.

Although neighbourhood plans cannot include policies that cover minerals and waste development, it may be the case that your neighbourhood contains an existing or planned minerals or waste site. The County Council can provide information on these operations or any future development planned for your neighbourhood.

You should also be aware of Minerals and Waste Safeguarding Areas, contained within the adopted [Minerals and Waste Local Plan](#). These safeguarding areas are there to ensure that non-waste and non-minerals development takes place in a way that does not negatively affect minerals resources or waste operations. The County Council can provide guidance on this if your neighbourhood plan is allocating development in these areas or if any proposed neighbourhood plan policies may impact on minerals and waste provision.

LCC continued

No.	Chapter/ Section	Policy Number	Comment	Response	Amendment
	51	CF2	<p>General Comments (above)</p> <p>Flood Risk Management (above)</p> <p>Planning Developer Contributions (above)</p> <p>Mineral & Waste Management (above)</p> <p>Property Education Specific Comments Page 51Cf2 (b)</p> <p>Wherever possible we will avoid building on recreation areas, to build on playing fields land would raise objection from Sport England so sometimes we have no choice but to build on recreation spaces, or playgrounds. Where we do this it will only be after any other options have been explored and exhausted, and we will also seek to mitigate the impact by providing recreation space elsewhere on the site</p> <p>General Comments Whereby housing allocations or preferred housing developments form part of a Neighbourhood Plan the Local Authority will look to the availability of school places within a two-mile (primary) and three-mile (secondary) distance from the development. If there are not sufficient places then a claim for Section 106 funding will be requested to provide those places.</p> <p>It is recognised that it may not always be possible or appropriate to extend a local school to meet the needs of a</p>	<p>The general, non-Hugglescote specific comments are noted.</p> <p>Noted. This is covered by the policy which ensures no loss of land for recreation. The provision of land elsewhere is acceptable.</p> <p>Noted. There are no residential allocations in the NP.</p>	<p>None</p> <p>None</p> <p>None</p>

		<p style="text-align: center;">G3</p>	<p>development, or the size of a development would yield a new school.</p> <p>However, in the changing educational landscape, the Council retains a statutory duty to ensure that sufficient places are available in good schools within its area, for every child of school age whose parents wish them to have one.</p> <p>Strategic Property Services</p> <p>No comment at this time.</p> <p><u>Adult Social Care</u></p> <p>It is suggested that reference is made to recognising a significant growth in the older population and that development seeks to include bungalows etc of differing tenures to accommodate the increase. This would be in line with the draft Adult Social Care Accommodation Strategy for older people which promotes that people should plan ahead for their later life, including considering downsizing, but recognising that people’s choices are often limited by the lack of suitable local options.</p> <p><u>Environment Specific Comments</u></p> <p>Policy G3: Design – This is a very strong and thorough policy.</p> <p>There is no mention of larger scale renewable energy sources such as solar farms or wind farms. Other Neighbourhood plans do take these into account and the group could be mindful of this.</p> <p>General Comments</p> <p>In regard to the environment and in line with the Governments advice, Leicestershire County Council (LCC) would like to see Neighbourhood Plans cover all aspects of the natural environment including climate change, the landscape, biodiversity, ecosystems, green infrastructure as well as soils, brownfield sites and agricultural land</p>	<p>Noted. The NP addresses this issue in Policy H1.</p> <p>Noted. Thanks. The PC felt that the reference in the design policy was sufficient and proportionate.</p> <p>Noted. The environment chapter is very comprehensive.</p>	<p>None</p> <p>None</p> <p>None</p>
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			<p>Climate Change The County Council through its Environment Strategy and Carbon Reduction Strategy is committed to reducing greenhouse gas emissions in Leicestershire and increasing Leicestershire’s resilience to the predicted changes in climate. Neighbourhood Plans should in as far as possible seek to contribute to and support a reduction in greenhouse gas emissions and increasing the county’s resilience to climate change</p> <p>Landscape The County Council would like to see the inclusion of a local landscape assessment taking into account Natural England’s Landscape character areas; LCC’s Landscape and Woodland Strategy and the Local District/Borough Council landscape character assessments. We would recommend that Neighbourhood Plans should also consider the street scene and public realm within their communities, further advice can be found in the latest ‘Streets for All East Midlands’ Advisory Document (2006) published by English Heritage.</p> <p>Biodiversity The Natural Environment and Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, in the exercise of their duties, to the purpose of conserving biodiversity. The National Planning Policy Framework (NPPF) clearly outlines the importance of sustainable development alongside the core principle that planning should contribute to conserving and enhancing the natural environment and reducing pollution.</p> <p>Neighbourhood Plans should therefore seek to work in partnership with other agencies to develop and deliver a strategic approach to protecting and improving the natural environment based on local evidence and priorities. Each Neighbourhood Plan should consider the impact of potential development on enhancing biodiversity and habitat connectivity such as hedgerows and greenways.</p> <p>The Leicestershire and Rutland Environmental Records Centre (LRERC) can provide a summary of wildlife information for</p>	<p>The following general, non-Hugglescote comments are noted, but are considered to be more appropriate at the start of the process rather than at Regulation 14 stage.</p>	<p>None</p>
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			<p>your Neighbourhood Plan area. This will include a map showing nationally important sites (e.g. Sites of Special Scientific Interest); locally designated Wildlife Sites; locations of badger setts, great crested newt breeding ponds and bat roosts; and a list of records of protected and priority Biodiversity Action Plan species. These are all a material consideration in the planning process. If there has been a recent Habitat Survey of your plan area, this will also be included. LRERC is unable to carry out habitat surveys on request from a Parish Council, although it may be possible to add it into a future survey programme.</p> <p>Contact: planningecology@leics.gov.uk, or phone 0116 305 4108</p> <p>Green Infrastructure Green infrastructure (GI) is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities, (NPPF definition). As a network, GI includes parks, open spaces, playing fields, woodlands, street trees, cemeteries/churchyards allotments and private gardens as well as streams, rivers, canals and other water bodies and features such as green roofs and living walls.</p> <p>The NPPF places the duty on local authorities to plan positively for a strategic network of GI which can deliver a range of planning policies including: building a strong, competitive economy; creating a sense of place and promote good design; promoting healthier communities by providing greater opportunities for recreation and mental and physical health benefits; meeting the challenges of climate change and flood risk; increasing biodiversity and conserving and enhancing the natural environment. Looking at the existing provision of GI networks within a community can influence the plan for creating & enhancing new networks and this assessment can then be used to inform CIL (Community Infrastructure Levy) schedules, enabling communities to potentially benefit from this source of funding.</p> <p>Neighbourhood Plan groups have the opportunity to plan GI</p>		
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			<p>networks at a local scale to maximise benefits for their community and in doing so they should ensure that their Neighbourhood Plan is reflective of the relevant Local Authority Green Infrastructure strategy. Through the Neighbourhood Plan and discussions with the Local Authority Planning teams and potential Developers communities are well placed to influence the delivery of local scale GI networks.</p> <p>Brownfield, Soils and Agricultural Land The NPPF encourages the effective use of brownfield land for development, provided that it is not of high environmental/ecological value. Neighbourhood planning groups should check with DEFRA if their neighbourhood planning area includes brownfield sites. Where information is lacking as to the ecological value of these sites then the Neighbourhood Plan could include policies that ensure such survey work should be carried out to assess the ecological value of a brownfield site before development decisions are taken.</p> <p>Soils are an essential finite resource on which important ecosystem services such as food production are dependent on. They therefore should be enhanced in value and protected from adverse effects of unacceptable levels of pollution. Within the governments “Safeguarding our Soils” strategy, DEFRA have produced a code of practice for the sustainable use of soils on construction sites which could be helpful to neighbourhood planning groups in preparing environmental policies.</p> <p>High quality agricultural soils should, where possible be protected from development and where a large area of agricultural land is identified for development then planning should consider using the poorer quality areas in preference to the higher quality areas. Neighbourhood planning groups should consider mapping agricultural land classification within their plan to enable informed decisions to be made in the future. Natural England can provide further information and Agricultural Land classification.</p> <p>Impact of Development on Civic Amenity Infrastructure</p>		
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			<p>Neighbourhood planning groups should remain mindful of the interaction between new development applications in a district area and the Leicestershire County Council. The County's Waste Management team considers proposed developments on a case by case basis and when it is identified that a proposed development will have a detrimental effect on the local civic amenity infrastructure then appropriate projects to increase the capacity to off- set the impact have to be initiated. Contributions to fund these projects are requested in accordance with Leicestershire's Planning Obligations Policy and the Community Infrastructure Legislation Regulations</p> <p><u>Communities</u></p> <p>Consideration of community facilities is a positive facet of Neighbourhood Plans that reflects the importance of these facilities within communities and can proactively protect and develop facilities to meet the needs of people in local communities. Neighbourhood Plans provide an opportunity to;</p> <ol style="list-style-type: none"> 1. Carry out and report on a review of community facilities, groups and allotments and their importance with your community. 2. Set out policies that seek to; <ol style="list-style-type: none"> 2.1 protect and retain these existing facilities, 2.2 support the independent development of new facilities, and, 2.3 identify and protect Assets of Community Value and provide support for any existing or future designations. 3. Identify and support potential community projects that could be progressed. <p>You are encouraged to consider and respond to all aspects of community resources as part of the Neighbourhood Planning process.</p> <p>Further information, guidance and examples of policies and supporting information is available at www.leicestershirecommunities.org.uk/np/useful-</p>		
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		<p>Policy</p>	<p>information.</p> <p><u>Economic Development</u> We would recommend including economic development aspirations with your Plan, outlining what the community currently values and whether they are open to new development of small businesses etc.</p> <p><u>Superfast Broadband</u> High speed broadband is critical for businesses and for access to services, many of which are now online by default. Having a superfast broadband connection is no longer merely desirable but is an essential requirement in ordinary daily life.</p> <p>All new developments (including community facilities) should have access to ultrafast broadband (of at least 100Mbps). Developers should take active steps to incorporate adequate broadband provision at the pre-planning phase and should engage with telecoms providers to ensure ultrafast broadband is available as soon as build on the development is complete. Where practical, developers should consider engaging several telecoms providers to encourage competition and consumer choice.</p> <p><u>Equalities</u> While we cannot comment in detail on plans, you may wish to ask stakeholders to bear the Council's Equality Strategy 2016-2020 in mind when taking your Neighbourhood Plan forward through the relevant procedures, particularly for engagement and consultation work. A copy of the strategy can be viewed at: www.leicestershire.gov.uk/sites/default/files/field/pdf/2017/1/30/equality-strategy2016-2020.pdf</p> <p><u>LCC Councillors</u> Very supportive of the plan, it is hoped that it will help the village to retain what it can of its heritage and natural amenity. It is a pity that so many established hedges have already been lost. The sooner this plan is adopted the better</p> <p>Policy CF3 - Concern in regard to the statement about an</p>	<p>Noted.</p> <p>Noted</p>	<p>None</p> <p>The policy will be re-</p>
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		<p>CF3</p>	<p>'additional doctor's surgery'. GP practices are tending to increase in size, as this allows for more services to be offered and for care to be given closer to home. Hugglescote Surgery was built with this intention in mind and has up to date facilities including a small operating theatre. Few GPs are currently interested in setting up a small practice in a village setting these days. Even if they were, S106 funding would need to be combined with considerable NHS or PFI (Public Finance Initiative), funding making it difficult for that to happen.</p> <p>It would be helpful if the Neighbourhood Plan could include a statement welcoming expansion/extension to the current surgery and reinforcing the need for car-parking space, community/public transport for patients who cannot drive and facilities for active travel (eg foot/cycle-paths) for patients who are able to walk/cycle.</p>		<p>written to also support an expansion of the existing surgery and support for provision for mobility scooters.</p>
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North West Leicestershire District Council (NWLDC)

Respondent Ian Nelson

No.	Chapter/ Section	Policy Number	Comment	Response	Amendment
			<p>General (page 16) 3rd paragraph under methodology Might be appropriate to quote what the NPPF says (page 49). NPPF refers to valued landscapes and recognising the “intrinsic character and beauty of the countryside” rather than protecting the countryside per se.</p>	<p>Agreed</p>	<p>Change to be made as indicated.</p>
		<p>Policy G2</p>	<p>Figure 2a Limits to development (page 17) It would help it this showed all of the area covered by the Neighbourhood Plan. The inclusion of additional land south of The Green Donington le Heath which has planning permission and is not included in the adopted Local Plan is noted.</p>	<p>The purpose of figure 2a is to show the limits to development. Figure 1 shows the neighbourhood area. To show the LtD within the Plan area would reduce the scale significantly and fail to show the necessary detail.</p>	<p>None</p>
		<p>Policy G2</p>	<p>South East Coalville Development Scheme (page 17) Planning permission is in place for all of south east Coalville. The latest housing trajectory identifies that 2,236 dwellings will be built by 2031. It is not clear if the reference to 1,900 dwellings is only that part of the site that is within the plan area?</p>	<p>We will clarify this</p>	<p>Change to be made as indicated.</p>
		<p>Policy G3</p>	<p>Policy G2 (South East Coalville Development Scheme) (page 19) The reference to figure 2b is slightly misleading as it suggests that all of the area shown on figure 2b is in the plan area. It would behelpful to delineate in some way that part that is within the plan area.</p>	<p>Agreed.</p>	<p>The boundary of the Neighbourhood Area will be shown on the map.</p>

			<p>Policy G3 (Design) (pages 20/21/22)</p> <p>(a) Provision of insulation is not a matter considered through the planning system</p> <p>(b) The requirement for a Design and Access Statement for all developments of more than 1 dwelling conflicts with the Planning Practice Guidance. Such a requirement only applies in areas designated as a World Heritage Site or conservation area (see link below).</p> <p>(d) would it be worthwhile also including links to Bardon employment area?</p> <p>h and i) Are these the same points expressed differently?</p> <p>(p) Is the reference to two bed properties necessary as they are also caught by being in the “three bedrooms or less “ category in the second part of this criteria.</p> <p>(q) First part does not make sense as worded. Should the last word be ‘supported’ rather than ‘promoted’?</p> <p>(r) The aspiration for this is supported, but there is currently no national requirement for universal vehicle charging points. It is also not clear as to whether this is technically feasible at the present time.</p> <p>https://www.gov.uk/guidance/making-an-application#Design-and-Access-Statement</p>	<p>The term ‘thermal insulation’ will be removed.</p> <p>Reference to a D&A Statement will be removed.</p> <p>Agreed.</p> <p>Agreed. I) to be deleted.</p> <p>Agreed.</p> <p>Agreed.</p> <p>Noted. Policy to be changed as per comment on page 28 above.</p>	<p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>Reference to two-bed dwellings to be deleted.</p> <p>‘Environmental issues to be embraced’ to be deleted. ‘Promoted’ changed to ‘supported’.</p> <p>Policy G3 r) is to be amended to say ‘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 two connections where viable and</p>
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		<p>Policy H1</p> <p>The approach to future residential growth (page 20, 1st paragraph)</p> <p>Unclear what the Leicester Housing Market Assessment (2017) is</p> <p>Policy H1 (Housing Mix) (page 23)</p> <p>4th paragraph. It would be helpful to also include the HEDNA recommendations for the mix of affordable housing alongside the market housing mix rather than later on.</p> <p>The housing needs report which accompanies the Neighbourhood Plan identifies (Table 5) that the proportion of 4 or more bedroomed properties (20.4%) are somewhat greater than the North West Leicestershire average (23.5%). Whilst it is recognised that there is some evidence of under occupancy, it is considered that the evidence does not support the approach set out in respect of larger homes.</p> <p>It would be helpful if some support was to be given for the provision of 1-bed market properties as well, otherwise developers assume they can provide them as affordable units only. This would provide a better mix as suggested in the HEDNA.</p> <p>It is not clear what is meant by the term “any single site” in the policy. Does it refer to an application site? What if the application site is a phase of part of a larger development?</p>		<p>appropriate to do so’.</p> <p>Change to be made as indicated</p> <p>None</p> <p>None</p> <p>Change to be made as indicated</p> <p>Top be replaced by ‘of the total’..</p>
		<p>Policy H2</p> <p>Policy H2 (Affordable Housing) (page 24)</p> <p>3rd paragraph – the Local Plan requirement for affordable housing in Hugglescote and Donington-le-Heath is 20% as they fall within the Coalville Urban Area.</p>	<p>This refers to the 2009 Leicester and Leicestershire Strategic Housing Market Assessment</p> <p>The reference is in the affordable housing section, which is considered appropriate.</p> <p>It is considered that the evidence is there to support the need for the housing mix as identified in the policy, otherwise it is likely that predominantly large houses will be built</p> <p>Agreed</p> <p>It can be removed</p> <p>Noted</p>	<p>Change to be made as indicated.</p>

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		<p>Policy H3</p>	<p>5th paragraph – since the HEDNA was produced a new NPPF has been published which includes a requirement that 10% of new homes be available for low cost home ownership (paragraph 64). Presumably this would form part of the 20% ‘low cost starter homes or other home ownership products’ quoted in the policy.</p> <p>The use of the term ‘intermediate housing’ no longer appears in the definition of affordable housing in the NPPF glossary. It is noted that the proposed policy does not use this term, but it would be useful to explain why this is.</p> <p>It should be noted that for the South East Coalville development area, the provision of affordable housing has already been agreed. The policy could only be applied to any additional development that comes forward within the parish.</p> <p>Policy H3 (Windfall Sites) (Page 25)</p> <p>In g) it would be helpful to make it clear that it is the occupiers of the “proposed dwelling” which is being referred to.</p> <p>It would be useful to consider including a further requirement as there may be instances where a site of up to 5 dwellings satisfies the floor space requirement of the adopted Local Plan policy.</p> <p>Suggest something like "where the requirement for an affordable housing contribution is triggered against the local plan affordable housing policy, that such provision is to be made"</p> <p>Policy H4 (Support to be given to brownfield sites) (Page</p>	<p>Yes – that is the intention.</p> <p>Agreed. Narrative to be reworded.</p> <p>Noted. We will make this clear in the narrative.</p> <p>Agreed.</p> <p>Agreed</p>	<p>None</p> <p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>Policy to change to ‘they do not reduce garden space to an extent where it adversely impacts on the character of the area, or the amenity of neighbours and the occupiers of the PROPOSED dwelling’</p> <p>Change to be made as indicated</p>
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		<p>Policy H4</p>	<p>25)</p> <p>What is meant by redundant land? Would it include land no longer used for agricultural purposes? The policy could include a cross reference to the definition of previously developed land as set out in the NPPF. For example,</p> <p>Within the Limits to Development, proposals for the redevelopment or change of use of redundant land or buildings <u>(which satisfies the definition of previously developed land as setout in the NPPF or any successor document)</u> will be supported, unless it conflicts with policies in the Development Plan.</p> <p>Environmental Inventory (Page28) Last sentence on page 28 refers to 'National Planning Policy Framework 2018' should this be 2019?</p> <p>Environmental Inventory (Page 29)</p> <p>The use of a scoring system to assess sites for designation as Local Green Space is questioned.</p> <p>In particular in assessing Accessibility as the Planning Practice Guidance states that land can be considered for designation as Local Green Space even if there is no public access. Therefore, sites with public access should not score higher than those with no public access.</p> <p>Also in terms of the 'bounded' criteria this appears to consider whether sites have some form of boundary i.e that they are not extensive tracts of land. In terms of the criteria set out in the NPPF there is no requirement for sites to have a specific boundary. This criteria may need re-wording.</p> <p>Policy ENV1: Protection of Local Green Space (Page 30)</p>	<p>Agreed</p> <p>Yes.</p> <p>Noted. The approach has passed examination on each occasion it has been presented which amounts to over 30 separate occasions. It has never been rejected by an Examiner therefore the questioning of the approach is unfounded. Indeed, some Examiners have praised to approach and commended its comprehensive nature.</p>	<p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>None.</p>
		<p>Policy ENV 1</p>	<p>A scoring system has been used to assess green spaces within the Neighbourhood Plan Area that could be designated as Local Green Space. The scoring system is based on the</p>	<p>The scoring system has</p>	<p>None</p>

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			<p>Local Green Space criteria as set out in the NPPF. The six sites included in Policy ENV1 are those with the highest overall score.</p> <p>Our interpretation of paragraph 100 of the NPPF (2019) is that sites only need to meet one of the criteria: beauty, historic significance, recreational value, tranquillity or richness of its wildlife. The scoring system used appears to require sites to meet a number of the criteria in order to achieve a high overall score. This would appear to be more onerous than the requirements of the NPPF.</p> <p>Policy ENV1 identifies 6 sites that are to be designated as Local Green Space. Appendix 5 appears to suggest that sites which score 24 or more should be designated as Local Green Space. However, Appendix 5 details numerous additional sites that score 24 or more and would therefore meet the scoring requirement to be designated as Local Green Space. It is not clear as to why these other sites have been excluded. These 'other' high scoring sites have been identified in Policies ENV2 and ENV3 which appears to create a hierarchy of protected sites based on what Local Green Space criteria they score the highest in. The methodology could be better explained and this approach may be overly complicated and add unnecessary tiers of designations.</p> <p>Unclear what “<i>exceptional circumstances</i>” might be, therefore it may be worth detailing what is meant by this.</p>	<p>been used to help identify which sites are most special to the local community.</p> <p>The NPPF is not prescriptive about how a local community determines its most special local spaces and neither should NWLDC.</p> <p>One Examiner commented 'I am satisfied that the analysis that has been undertaken (of Local Green Spaces) is proportionate to the task involved. The analysis of the sites against the second of the NPPF criteria is very informative'</p> <p>Noted. The LGS designations have been reviewed.</p> <p>A comment similar to this was been made by NWLDC in response to the Ellistown and Battleflat NP and the</p>	<p>Change made as indicated.</p> <p>None</p>
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				<p>Examiner replied 'In the Regulation 16 response, NWLDC sought clarification of what would constitute “very special circumstances”, the phrase used in Policy NE1. Paragraph 78 of NPPF states that the policy for managing development within a LGS should be consistent with policy for Green Belts, which uses the same phrase in paragraph 87. Such “very special circumstances” are not generally defined and can only be judged on a case by case basis'.</p> <p>It is disappointing that this recommendation from the Examiner has not been taken on board.</p> <p>It may also be noted that the NWLDC Local Plan references exceptional circumstances without describing what they might be (see pages 31 and 103 as examples). It is unclear why it is necessary for Neighbourhood Plans to specify 'exceptional circumstances' but not the NWLDC Local Plan?</p>	
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		<p>Policy ENV 3</p>	<p>Table 2 Page 31 Hugglescote Cemetery, there is an additional 3 in the History criteria column</p> <p>Sites of environmental significance (page 35)</p> <p>See the comment under EV1 re the scoring system for the Local Green Space designation</p> <p>Figure 7.1 (page 36) The key is not clear in the title for the figure, it would be easier to see if it followed the format of figure 7.2The purple features are very difficult to see unless very zoomed in, if this is being used as a paper copy then it could help thereader to label the features.</p> <p>Important Open Space (page 37)</p> <p>Sentence states that 'This policy is in general conformity with NWLDC Adopted Local Plan (2017) Policy IF3 (4-6)' - unsure if this sentence is needed as only part of the Neighbourhood Plan Policy refers to the Loss of Open Space which is what is referredto in the Local Plan Policy IF3 parts 4-6.</p> <p>Policy ENV3: Important Open Spaces (page 37)</p> <p>Policy ENV3 refers to the loss of open space. This is already included in Policy IF3 of the adopted Local Plan. The Neighbourhood Plan is not required to repeat this.</p> <p>The wording of Policy ENV3 could be made clearer. The Policy identifies sites that are to be protected as Important Open Spaces therefore it is unclear what is then meant by 'through confirmation as existing or designation as new, Open Space, Sport and Recreation (OSSR) sites in appropriatetypologies'. Unclear as to what the typologies are and how they have been applied as they have not been applied to all of the sites. An explanation in the supporting text would be useful.</p>	<p>Noted</p> <p>Noted</p> <p>Noted. All maps will be available online at full size for this reason.</p> <p>Noted.</p> <p>Reference is made to the Local plan designations for completeness. The policy will be amended as indicated alongside:</p>	<p>Change to be made as indicated.</p> <p>None</p> <p>None</p> <p>Change to be made as indicated.</p> <p>Development proposals that result in the loss of, or have a significant adverse effect on, the following areas of public open space (figure 8 and appendix 5) will not be supported, unless the public open space is replaced by an</p>
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		<p>ENV 6</p>	<p>Biodiversity and habitat connectivity (page 44)</p> <p>The third paragraph states there has been an ‘observed 70% decline’ what is the source for this claim? The following paragraph has a ‘ mark before embed which seems to suggest it is a quote, but there is no end to the quote and nor is it clear where it comes from.</p> <p>Local Wildlife Corridor (page 44)</p> <p>The cross reference needs to be completed, at present to refers to Policy ENV xx</p> <p>Figure 13 (page 45)</p> <p>It is not clear on the choice for the green habitat sites supporting the wildlife corridor. When compared with figure 7.2 it would appear the some but not all of various types of site of natural significance have been used to create one linear corridor. Indeed there are areas of land which are not identified in figure 7.2 being used</p> <p>What is the justification / assessment for including sites in this policy and why is the map focussing on a single line of corridor and not connecting to the other sites identified in figure 7.2?</p> <p>Policy ENV 6 (page 45)</p>	<p>Common usage - various numbers, but this recorded scale of decline has been the basis of all EU and UK conservation and species protection policy and practice for last 25 years</p> <p>Agreed</p> <p>These are the sites of environmental significance for which the corridor provides connectivity.</p> <p>Connecting all the sites of environmental significance would require creating a Plan-wide swathe of corridor that would be excessive and would fail examination.</p>	<p>equivalent or better provision in an equally suitable location or it can be demonstrated that the public open space or is no longer required by the community.</p> <p>None</p> <p>Change to be made as indicated</p> <p>None</p> <p>None</p>
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			<p>In the second paragraph it states “<i>In cases where the development is determined...</i>” This is a bit ambiguous as to what is acceptable to outweigh the biodiversity loss is it the scale / type / benefits of the development?</p>	<p>‘This refers to the decision-making processes undertaken by Officers and Councillors. There may be persuasive or decisive reasons for permitting a development despite the proven environmental significance of the site. Planning is about a balance of ‘benefit’ against ‘harm’ and it is up to the applicant to demonstrate benefit.</p>	<p>None</p>
		<p>Policy T1</p>	<p>Policy T1: Transport Assessment for new Housing Development (Page 48)</p> <p>It is assumed that the role of this policy is not to require the submission of Transport Assessments. Rather it details what sort of the information should be submitted, in the instances that a Transport Assessment is required. The Leicestershire County Council Highway Design Guide identifies the circumstances a Transport Assessment is required, which is determined by the size and type of development. It may be useful to refer to this document in order to provide clarity. Point e refers to NP policy H8 however, there are only 4 housing policies in the Neighbourhood plan.</p>	<p>Noted. The Highways Agency have said ‘We also note and welcome the inclusion of Policy T1 for the provision of Transport Assessments for new housing developments, to demonstrate that they will not have a severe impact on the highway network’</p>	<p>None</p>
		<p>Policy T2</p>	<p>Policy T2: Residential and Public Car Parking (page 49)</p> <p>With respect to the parking standards proposed for 4+bedroom dwellings, this aspect of the policy would not comply with the North West Leicestershire Local Plan, the district’s Design SPD nor the parking standards set out within the Leicestershire County Council Highway Design Guide. These only require the provision of 3 spaces per dwelling for four or more bed properties.</p>	<p>Agreed</p>	<p>The wording will be changed to ensure conformity with Highways standards.</p>

		<p>Policy T3</p>	<p>Policy T3: Leicester to Burton Railway Line</p> <p>It is not clear as to what exactly is meant by “Proposals that threaten...”. Suggest that it be reworded to state “Proposals for development within the plan area that threaten ...”</p> <p>At the current time there are no proposals to reopen the line and nor have any potential station sites. What happens if land between the Bardon Grange development and the railway line is not available, but land elsewhere in the plan area is? It might be better to state “Development of a new station and associated infrastructure within the plan area will be supported...”</p> <p>Community Facilities and Amenities (page 50)</p> <p>Should the reference to the Working Mens Club be changed to the Social Club? There only appears to be one shop (McColls with Post Office) if the second shop is the Central Stores, this was converted in 2016. If the second shop is not either of the two above then it may help to include the road they are on. Similarly, it would help to identify the location of many of these facilities and/or their name.</p> <p>Policy CF1: Community Facilities and Amenities (pages 50-51)</p> <p>Point d refers to policy G2 (SE Coalville) is this correct? Should it be G3 the general design policy?</p> <p>Point f refers to “unacceptable traffic movements” how will these be quantified? We suggest this include reference to the standard of the Local Highway Authority.</p> <p>Points e and f are partly repetitious and can be joined together.</p>	<p>Agreed</p> <p>Agreed</p> <p>Agreed</p> <p>It should be G3</p> <p>The reference was not opposed by the Highways Authority nor Highways England so it is suggested that it should remain as it is.</p>	<p>Change to be made as indicated</p> <p>Change to be made as indicated</p> <p>Change to be made as indicated</p> <p>Change to be made as indicated</p> <p>None</p>
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		<p>Policy CF3</p> <p>Policy CF3 Doctors Surgery (page 52) Point a refers to “unacceptable traffic movements” how will these be quantified?</p> <p>We suggest this include reference to the standard of the Local Highway Authority.</p>	<p>Agreed. Point ‘f’ to be incorporated into point ‘e’</p>	<p>Change to be made as indicated.</p>
		<p>Policy CF4</p> <p>Policy CF4 Noisy Sports (page 52)</p> <p>It is not clear as to how in determining a planning application, the areas in point a would be defined and how excessive noise in point b should be interpreted?</p>	<p>As above</p>	<p>None</p>
		<p>POLICY E1: Support for existing employment opportunities (page 53)</p> <p>The general principle of the policy is supported – however it is not clear if both bullet points need to be demonstrated (i.e. if there should be an ‘and’ between them) or whether only one needs to be demonstrated (so there should be an ‘or’ between them).</p> <p>Also, is the 12 months in bullet point a) additional to or concurrent with the six months marketing included in bullet point b).</p> <p>Does the employment-generating uses in bullet point b) relate only to B-class uses or any employment generating uses?</p>	<p>Planning Practice Guidance on noise https://www.gov.uk/guidance/noise--2</p>	
		<p>Policy E1</p> <p>POLICY E2: New small scale employment (page 53)</p>	<p>An ‘and’ will be inserted here ...</p>	<p>Change to be made as indicated.</p>
		<p>Policy E2</p> <p>The policy states that small scale employment needs to comply with the provisions of Policy.... – which Policy is this?</p> <p>POLICY E3: Working from home (page 54)</p>	<p>It is concurrent</p> <p>It refers to B class uses</p>	<p>None</p> <p>None</p>
			<p>G3</p>	<p>Change to be made as indicated.</p>

		<p>Policy E3</p> <p>In bullet point 3, it might be useful to reference design policies in the Local Plan and the Good Design SPD.</p>			<p>The NP policies have to be in general conformity with the Local Plan and we take the view that it is unnecessary to repeat specific Local Plan policies.</p>	<p>None</p>
		<p>Policy E4</p> <p>There should either be 'and' or 'or' between each bullet point to clarify if one or all need to be satisfied.</p> <p>POLICY E4: Re-use of agricultural and commercial buildings (page 55)</p> <p>There should either be 'and' or 'or' between each bullet point to clarify if one or all need to be satisfied.</p> <p>G: Developer Contributions (page 56)</p> <p>The third paragraph uses a reference to "(PPG 46)" the Planning Practice Guidance is organised like a glossary with an alphabetised list so it is not clear how this reference works.</p> <p>The District Council is not currently considering the introduction of CIL. However, it may do so at some future point in time. It is suggested that this section be amended to reflect this.</p> <p>The list under CF1 has two points which should be reconsidered:</p> <ul style="list-style-type: none"> The reference to gateway features for the village seems to be a better fit under the highways requirements rather than a community facility due to the tie in to speed reduction. <p>Notwithstanding this, any request needs to relate to the impact that the new development will have on the existing facilities, it is difficult to see how a</p>			<p>'And' to be inserted between bullet points.</p> <p>'And' to be inserted between bullet points.</p> <p>Reference to be amended</p> <p>Reference to CIL will be amended</p> <p>It is not considered necessary to change the heading under which the gateways feature is located. This seems to be a moot point.</p> <p>The list represents aspirations to be funded</p>	<p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>None</p>

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			<p>development would be unacceptable in planning terms if the gateways are not provided.</p> <ul style="list-style-type: none"> The reference to “<i>securing the community centre which is currently owned by the Anglican Church</i>”, will be difficult to achieve as it involves land in a third party ownership, an unknown cost (at this time) and the likelihood that the scale of new development beyond that already committed will be limited and so would not generate a significant financial contribution. <p>Appendix 5: Survey and Research (end of Page 3)</p> <p>This includes an extract from the NPPF which details the Local Green Space criteria and is taken from the 2012 NPPF, this should be updated to show para. 100 from the 2019 NPPF.</p>	<p>through developer contributions should they become available. The gateways are an identified improvement – no one is saying that failure to provide them would lead to a planning refusal.</p> <p>Noted</p> <p>The reference will be updated to 2019</p>	<p>The reference will be changed to ‘improving’ the community centre.</p> <p>Change to be made as indicated.</p>
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NWLDC continued

No.	Chapter/ Section	Policy Number	Comment	Response	Amendment
<u>Comments from Conservation Officer</u>					
<p>The parish of Hugglescote and Donington-le-Heath contains eight listed buildings including the grade II* listed Manor House at Donington and the grade II* listed parish church at Hugglescote. Pevsner (1984) describes the latter as “easily the best C19 church [in Leicestershire] outside Leicester”. The parish contains two conservation areas and five identified local heritage assets. These include the former National School (1862) and the former Grammar School (1909) as well as three buildings in the Hugglescote conservation area. In 2017 we adopted a rapid appraisal to support the designation of the Hugglescote conservation area.</p>					

<p>I am pleased that heritage is important to the Parish Council. For instance the foreword refers to “the importance of retaining our heritage”; the ‘background’ says that protection of “buildings and structures of historic and architectural interest” is one of seven planning issues that “matter most to the community”; the ‘vision’ refers to the need to “balance the distinct heritage of the parish” (although it does not say what it should be balanced against). The subchapter “natural and historic environment” accounts for one-third of the draft plan. Hence it is a pity that the draft plan makes no reference to conservation areas and contains no policy relating to development affecting conservation areas. It is a pity that it contains no policy relating to development affecting the settings of listed buildings. It is a pity that it contains no reference to the District Council’s list of local heritage assets and no reference to the shrunken medieval village of Snibston.</p>					
			<p>Comment re (above)</p> <p>Comment Re Snibston (above)</p> <p>Brief history’</p> <p>Page ten contains a ‘brief history’ of the parish. It contains no reference to the shrunken medieval village of Snibston.</p> <ul style="list-style-type: none"> • Paragraph one says that “the first written record ... is to be found in the Domesday Book, with reference to Donington manor”. It would be useful to note that Hugglescote does not appear in the Domesday Book and that the first chapel-of-ease at Hugglescote was erected in the late fourteenth century (Moore,2005). • Paragraphs three and four appear to quote at length from a Victorian trade directorybut the source is not credited. Paragraph four 	<p>Conservation areas are covered by local legislation as are listed buildings. It is not considered necessary to repeat local and national strategic policies in the Neighbourhood Plan.</p> <p>Noted. It is not felt essential to include this.</p> <p>This is not felt necessary. The paragraph is correct as it stands.</p> <p>The historic nature of the figures will be made clear.</p>	<p>None</p> <p>None</p> <p>None</p> <p>Change to be made as indicated</p>

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			<p>contains population figures for the 'township' and 'ecclesiastical parish' that do not agree with the figures on page 11. If these figures are 'historic' then this should be made clear.</p> <ul style="list-style-type: none"> • Paragraphs four and seven refer to the Church of St John the Baptist. The paragraphs repeat and contradict each other. Paragraph four says that the church was built in 1879 in the Franco-Norman style but paragraph seven says that it was built in 1878 in the English Geometrical Decorated style. • Page 26 describes Hugglescote as a "nineteenth-century expansion of Coalville based on a medieval village" but page ten makes no reference to this expansion. <p>Paragraph four says that "the manor belonged to Lord Donington and is now part of Leicestershire Museums". This paragraph appears to confuse the manor (lower case) with the Manor House (upper case). The Hastings family were lords of the manor (Charles Hastings was created Lord Donington in 1880) but the <i>soi-disant</i> Manor House was owned by the Osgathorpe Charity (now part of Thomas Charley's Charities). It may be interesting to explore the connection between the Manor House, the Osgathorpe Charity and the former Grammar School, which succeeded the Free Grammar School at Osgathorpe.</p> <p>Paragraph six says that Hugglescote and Donington "were part of the parish of Ibstock until 1878, when they were formed into a separate civil parish". It says that "in 1936 the parish was absorbed by the urban district of Coalville". This paragraph appears to confuse the civil</p>	<p>To amend</p> <p>The further reference is not considered necessary</p> <p>This is not considered to be an essential element of the neighbourhood plan.</p> <p>This proposed amendment is not considered critical to the neighbourhood plan.</p>	<p>None</p> <p>None</p> <p>None</p>
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		<p style="text-align: center;">Sub Policies</p>	<p>“all development will enhance and reinforce the local character” but makes no allowance for “contemporary and innovative” design.</p> <ul style="list-style-type: none"> • Sub-policies G3(a), G3(f), G3(g) and G3(q) refer to “green technology” and “sustainable design”. I am pleased that these sub-policies have been included – they reflect Local Plan policy D1(5) – but the sub-policies are repetitive and sub-policy G3(f) does not appear to constitute a policy. • Sub-policies G3(h) and G3(i) refer to the “diversity” of new development. Sub-policy G3(i) says that “within each development the housing should not be the same in appearance”. Parts of the parish (e.g. the “nineteenth-century expansion of Coalville”) exhibit a great degree of uniformity and in these contexts uniform development would be “sympathetic”. • Sub-policies G3(p) and G3(r) refer to parking and electric vehicle charging. These sub-policies appear more relevant to chapter D “Transport and access”. <p>Finally I am disappointed that policy G3 makes no reference to the creation of safe places. For instance please refer to NPPF paragraph 127(f) and Local Plan policy D1.</p> <p>Donington Fields Page 27 contains two paragraphs of text entitled “historic environment”. The text does not appear to</p>	<p>This is the fourth time in as many pages that NWLDC has used the term ‘it is a pity’ to reflect something they wanted to see in the Neighbourhood Plan. The Plan reflects local priorities and not the issues prioritised by the local planning authority, especially when they are already covered by local or national policies.</p> <p>Policy G3 seeks to enhance development and it is considered that it does so in an appropriate manner.</p> <p>Leicestershire County Council said of policy G3 ‘This is a very strong and thorough policy’.</p> <p>This is already covered in the Local Plan and NPPF as confirmed in the comment.</p> <p>This is a general introduction and should be</p>	<p>None</p> <p>None</p> <p>None</p>
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			<p>refer to the historic environment but instead refers to “the agricultural land known locally as ‘Donington Fields’”. The text says that “this is an important environmental and recreational area” but the draft plan does not refer to it as a heritage asset. The fields are not identified on figure 7.1 “sites of historic environment significance” or in policy ENV4 “local heritage assets”. Figure 11.3 indicates that one of the fields contains well preserved ridge-and-furrow.</p> <p>Destroyed features Page 28 refers to the “site of the Manor House bank-and-ditch” and describes this as a “feature of high historical and archaeological significance”. Policy ENV4 refers to the site of a cruck framed house and describes it as a “local heritage asset ... important for [its] contribution to the village”. These features have been destroyed.</p> <p>Local heritage assets</p> <p>Page 39 says that the NPPG “confirms the ability of neighbourhood plans to identify non- designated heritage assets”. The NPPG says that “there are a number of processes through which non- designated heritage assets may be identified, including the local and neighbourhood plan-making processes”. It also says that “it can be helpful if LPAs keep a list of local heritage assets, incorporating any such assets that are identified by neighbourhood planning bodies”. Historic England (2016) <i>Local heritage listing</i> says that “work in preparing a neighbourhood plan may indicate buildings and sites that merit inclusion on a local list” but recommends that “final ratification” of a local list should be “sought at the appropriate level within the LPA”.</p>	<p>seen as such. It is not historically inaccurate. The whole area is already recognised by Historic England.</p> <p>The features have been destroyed but the site remains important, which is why it is recognised. Manor House bank remains listed by Historic England</p> <p>This same comment, challenging the role of the Neighbourhood Plan to identify heritage assets, was made by NWLDC in relation to the Ellistown and Battleflat neighbourhood plan.</p> <p>The Examiner kept the neighbourhood plan policy (which has been used to frame the policy on this issue in the Hugglescote and Donington le Heath Neighbourhood Plan).</p>	<p>None</p> <p>None</p>
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			<p>In conclusion a neighbourhood plan should not contain a list of local heritage assets, but the plan-making process (“the work in preparing a neighbourhood plan”) may identify non-designated heritage assets and the LPA may subsequently include these assets on a locallist.</p> <p>Page 39 says that the County Council “has identified five buildings and structures ... that are considered to be of local significance”. The draft plan does not say when or how this work was carried out or which buildings and structures were identified. I suspect this is a reference to the District Council’s adopted list of local heritage assets. Page 39 says that “recent research for the Parish Council has identified a further seventeen buildings and structures of similar local heritage significance”. Again the draft plan does not say when or how this work was carried out and I suspect that the “research” is based substantially upon our draft list of local heritage assets, which was prepared in 2017.</p> <p>The Parish Council should credit the District Council for the work that it has carried out.</p>	<p>The Neighbourhood Plan policy makes no reference to a local list but identifies buildings of local significance in line with the Examiner's recommendations from the Ellistown and Battleflat neighbourhood plan.</p> <p>It appears that the author of this comment does not accept the Examiner's recommendations but this is no reason to continue to criticise its application.</p> <p>These locations and descriptions have been taken from the Leics. HER gazetteer and map for ‘non-Listed buildings’ as provided to the NP committee</p> <p>This is an inappropriate comment. This is not the role of a neighbourhood plan.</p>	<p>None</p>
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			<p>Figure 7.1 indicates “sites of historical [sic] environment significance”. It indicates no more than twenty sites so it should be feasible to list the sites in the text (see policy ENV3). Figure 7.1 depicts earthwork remains at Hugglescote Grange and Snibston in a manner that differs substantially to our draft list of local heritage assets (see attached). At Snibston the Historic Environment Record notes that “most earthwork remains have been ploughed out”.</p> <p>Ridge and furrow Page 42 says that Historic England “recognises the national historic importance of ridge-and-furrow and supports its protection as a non-designated heritage asset”. No source is offered to support this assertion. Figure 11.3 indicates “surviving ridge and furrow” coloured buff and orange. There is no key to explain the significance of the two colours.</p>	<p>As above, the sites marked in figure 7.1 are taken from the Leics HER, but detail of precise extent of earthworks within the inventory parcels has not been mapped precisely. The intention is to draw the sites’ existence to the attention of Planners, rather than provide a precise interpretation of the archaeological features.</p> <p>Various sources, including this in Designation: Scheduling Selection Guide: Agriculture Historic England 2015: Given that archaeological sensitivity is all around us, it is therefore important that all means of protecting archaeological remains are recognised. Other designations such as listing can play an important part here. Other sites may be identified as being of national importance, but not scheduled: Government policy affords them protection through the planning system (see http://www.communities.gov.uk/planningandbuilding/pla</p>	<p>None</p> <p>None</p>
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				<p>nningsystem/planningpolicy/planningpolicyframework/), and local authorities play a key part in managing them through their archaeological services and Historic Environment Records. Policies for protecting non-scheduled heritage assets of equivalent significance to scheduled monuments are explicitly encouraged via the National Planning Policy Framework (March 2012; http://www.communities.gov.uk/documents/planningandbuilding/pdf/2116950.pdf). One of its twelve core principles is that planning should conserve heritage assets in a manner appropriate to their significance (para 17). It further states that non-designated archaeological sites of demonstrable equivalence to scheduled monuments should be treated as designated heritage assets (para 139). This makes the identification of such sites all the more important. Archaeological remains are thus protected by various means.</p>	
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			<p>Other comments</p> <ul style="list-style-type: none"> • On page 14 the 'vision' refers to the area's "proud industrial heritage" but none of the sites identified in figure 7.1 or in policy ENV4 are industrial heritage sites. • The map on page 18 indicates the boundary of the South Eastern [sic] Coalville development scheme. It would be useful to indicate the parish/plan boundary on this map. • Page 38 refers to listed buildings and says that development should "take into account their settings as defined (on a case-by-case basis) by Historic England". This makes no sense. Historic England has defined the term 'setting' but it is not responsible for defining the settings of listed buildings "on a case-by-case basis". • Page 46 refers to six "important views". For monitoring purposes it would be useful to include a photograph to indicate each view. 	<p>Noted</p> <p>Agreed</p> <p>This sentence will be removed.</p> <p>Images of the views are contained in appendix 7</p>	<p>None</p> <p>Change to be made as indicated</p> <p>Change to be made as indicated.</p> <p>None</p>
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**Hugglescote Surgery
(West Leicestershire CCG)**

Respondent Practice Manager

No.	Chapter/ Section	Policy Number	Comment	Response	Amendment
		POLICY CF3: DOCTORS SURGERY	Hugglescote Surgery’s patient list now stands at 8,400, having risen significantly over the last few years. As one of the largest Practices in the locality, and already functioning as a local ‘hub’, the surgery urgently needs new capacity to deliver services for its increasing patient list through committed residential developments that fall within the practice boundary area. We are working closely with West Lincolnshire CCG, the Local Authority, our landlord and David Wilson Homes to secure some additional land adjacent to the current building, which we would welcome. We propose to build an extension on the current site, not only to accommodate the additional patients but also to extend the services provided to ensure that patients are treated closer to home. The additional land will also enable us to extend the car park which is already too small currently to accommodate staff and patients. Where possible we will also encourage staff and patients to walk or cycle and secure cycle hoops will be provided. This solution is far more efficient both in terms of cost and service delivery than building a new additional Doctors Surgery as mentioned in policy CF3.	Noted	None