

## Ellistown and Battleflat Neighbourhood Plan

### Pre-submission consultation responses. November 2017

No.	Chapter/ Section	Policy Number	Responde nt	Comment	Response	Amendment
1			Coal Authority	<p>Thank you for the notification of the 7 August 2017 consulting The Coal Authority on the above NDP.</p> <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 form of 2 mine entries. If the Neighbourhood Plan allocates sites for future</p>	Noted	None

				<p>development in these areas then consideration as to the development will need to respond to these risks to surface stability in accordance with the National Planning Policy Framework and the North West Leicestershire Development Plan.</p> <p>In accordance with the Neighbourhood Planning (General) Regulations 2012 (as amended) please continue to consult The Coal Authority on planning matters using the specific email address of <a href="mailto:planningconsultation@coal.gov.uk">planningconsultation@coal.gov.uk</a>.</p> <p>The Coal Authority wishes the Neighbourhood Plan team every success with the preparation of the Neighbourhood Plan.</p>		
2			Environment agency	<p>Thank you for your letter of 7<sup>th</sup> August 2017 addressed to Mr M Candlin.</p> <p>Please could you amend your records to ensure that any future correspondence on this plan comes to myself.</p> <p>I have attempted to use the “word” version of the response form but the form is not set up correctly in that comments cannot be entered on the</p>		

				<p>same line as the paragraph or Policy ref to which it relates. I have therefore made my comments below.</p> <p>It may be worth considering having all of the figures as appendices to the plan, and using a complete A4 page for each figure.</p>	<p>Noted. High resolution versions of all the figures and maps will be made available with the Submission version.</p>	<p>High resolution maps to be made available.</p>
2		Page 4, figure 1	Environment agency	<p>Designated Area – This is a very poor plan, it is not at all clear what the designated area incorporates.</p>	<p>A high-resolution version of the designated area map will be available with the submission version.</p>	<p>High resolution map to be made available.</p>
2		Page 15, general policy principle	Environment agency	<p>Presumption in favor of Sustainable Development - I support this Policy.</p>	<p>Noted. In light of other comments received, the text will be retained but the policy deleted.</p>	<p>Deletion of general policy principle.</p>
2		Page 19, figure 2 – limits to development	Environment agency	<p>This is a very poor plan, it is not that clear. I would suggest that all base maps are colour extracts from the Ordnance Survey maps.</p>	<p>Noted. A high-resolution version of the LtD area map will be available with the submission version.</p>	<p>High resolution map to be made available.</p>
2		S1	Environment agency	<p>Ellistown Limits to Development, I support this Policy.</p>	<p>Noted</p>	<p>None</p>
2		S2	Environment agency	<p>Land outside of Ellistown Limits to Development, I support this Policy.</p>	<p>Noted</p>	<p>None</p>
2		Page 21, figure 3	Environment agency	<p>South Eastern Coalville Development Scheme - This is a very poor plan, it is not that clear. I would suggest that all base maps are colour extracts from the Ordnance Survey maps.</p>	<p>A high-resolution version of the designated area map will be available with the submission version.</p>	<p>High resolution map to be made available.</p>
2		S3	Environment agency	<p>South East Coalville Development Scheme – I support this Policy and in</p>	<p>Noted</p>	<p>None</p>

				particular point in respect of biodiversity.		
2		NE2	Environment agency	Biodiversity – I support this policy.	Noted	None
2		Page 39, figure 5	Environment agency	Areas of environmental interest - This is a very poor plan, it is not that clear. I would suggest that all base maps are colour extracts from the Ordnance Survey maps. The key is that small that I had to use a magnifying glass to read it.	A high-resolution version of the designated area map will be available with the submission version.	High resolution map to be made available.
2		Page 46, figure 7	Environment agency	Public Rights of Way -This is a very poor plan, it is not that clear. I would suggest that all base maps are colour extracts from the Ordnance Survey maps. The key is that small that I had to use a magnifying glass to read it.	A high-resolution version of the designated area map will be available with the submission version.	High resolution map to be made available.
3			GDL	Please find enclosed our representations to Regulation 14 consultation on the Ellistown and Battleflat Neighbourhood Plan. In summary, we are unclear as to the basis for the preparation of the Neighbourhood Plan. Paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 sets out the 'basic conditions' that Neighbourhood Plans should satisfy, with Part (e) requiring that the plan should be in general conformity with the strategic policies contained in the	The Neighbourhood Plan has been prepared to be in general conformity with the Adopted Local Plan whilst also having regard for the emerging Local Plan, which is likely to be Adopted in advance of the Neighbourhood Plan.  The respondent is wrong to suggest that the NP should not take into account the development activity proposed for the Parish. Planning Practice Guidance	None.

			<p>development plan for the area of the authority.</p> <p>Presently, the adopted 2006 Local Plan comprises the development plan for the area; however, having read the plan it is clear that the basis for the policies is in fact the emerging Local Plan, which is not yet adopted. The concern associated with this approach is that the plan may therefore not be found to be in conformity with the basic conditions and part (e) in particular, as it clearly is not in conformity with the 2006 Plan. A good example of this is that the 2006 Local Plan does not advocate development on the scale proposed in the open countryside on land to the east of Ellistown and west of Bardon at the South East Coalville SUE, which itself is a development borne out of the emerging Local Plan and future development needs.</p> <p>We therefore consider it would be most appropriate to await the Inspector's Report and outcomes of the consultations on any subsequent modifications to the Local Plan before the Neighbourhood Plan is taken forward. Subsequent to this, if any</p>	<p>is clear (ID 41-009-20140306) that NPs can come forward in advance of emerging Local Plans, and whilst the NP will not be tested against policies in an emerging Local Plan, 'evidence informing the Local Plan process may be relevant to the consideration of the basic conditions against which an NP is tested'.</p> <p>Evidence in relation to housing numbers is critical to this process.</p>	
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				<p>changes to the Neighbourhood Plan are required to ensure conformity with the emerging Local Plan, this may necessitate a further round of public consultation.</p> <p>The above points are expanded on further in relation to individual sections and policies of the Draft Neighbourhood Plan below:</p>		
3		Section 1.1	GDL	<p>The NP states on page 8 and at 1.1 that the plan has been prepared to be in conformity with the emerging Local Plan; however, it seems apparent through the introductory text to policies (for example policy 1.3 which pertains to the settlement hierarchy), that the Neighbourhood Plan has principally been drafted to be in accordance with the emerging Local Plan and not the 2006 Local Plan.</p> <p>We would like to highlight we have previously submitted representations and attended the EiP to propose that Ellistown should actually be considered part of the Coalville Urban Area (CUA). This is principally due to the proposed South East Coalville SUE and Amazon Warehouse development which, as the Neighbourhood Plan</p>	<p>The NP has been prepared to be in general conformity with the Adopted Local plan whilst having regard for the emerging Local Plan. The text in the NP has been clarified to reinforce this.</p> <p>Any amendments made by the Inspector in the Local Plan Examination which have a material impact on the NP will be highlighted by the NP Examiner and incorporated where appropriate.</p>	<p>Reinforcing reference to the need for the NP to be in general conformity with the Adopted Local Plan.</p>

				<p>recognises in the final paragraph of the supporting text to Policy 1.3, is directly adjacent to Ellistown (and which is supported in the Draft Neighbourhood Plan with a draft policy).</p> <p>If this is accepted by the Inspector on the Local Plan (who is due to provide a report on the Local Plan imminently) this would necessitate modifications to the Local Plan and in those circumstances we would like to suggest the Draft Neighbourhood Plan is updated to ensure conformity with that document.</p>		
3		Section 1.2	GDL	<p>We consider the presumption in favour of sustainable development should be amended, as the policy in blue font states, "the Parish Council will take a positive approach that reflects the presumption in favour <b>contained in this Neighbourhood Plan...</b>" (emphasis added); however, the policy doesn't go on to set out the presumption. Further, the policy refers to the presumption contained in the North West Leicestershire Local Plan, but the 2006 Local Plan naturally does not include the presumption and the emerging Plan hasn't yet been</p>	<p>Noted. The general policy principle has been removed as a policy but retained as part of the narrative.</p>	<p>General policy principle deleted.</p>

				adopted. The policy should therefore be amended to either provide the presumption, refer just to the Framework, or refer to the Framework and the emerging North West Leicestershire Local Plan.		
3		Section 1.3	GDL	<p>As set out in the introduction to these representations, the third paragraph of the introductory text to policy 1.3 refers to the settlement hierarchy, as described in the emerging Local Plan. As identified in relation to section 1.1 of the Neighbourhood Plan, if this changes it may render the document out of date and therefore we suggest awaiting the Inspector's Report (due to be published this month) before progressing further with the Neighbourhood Plan, as this may re-categorise Ellistown as forming part of the Principal Town.</p> <p>In the light of the Neighbourhood Plan being drafted in accordance with the emerging Plan and not the adopted Plan, it will therefore also be appropriate to await the Inspector's report to see if he concludes there should be an increase to North West Leicestershire's housing</p>	Legislation is clear that NPs can come forward prior to the Adoption of Local Plans, but need to be based on the most up to date evidence that is available. The NP satisfies this requirement.	None.

				<p>requirement. This may require the identification of additional sites to meet housing needs. In such circumstances, we would be grateful if the Neighbourhood Planning Body would consider the inclusion of our site which is currently the subject of a planning application being determined by the Local Authority (application reference 17/00181/OUT, 'land North of Leicester Road, Ellistown').</p>		
3		Section 1.4	GDL	<p>We support the Neighbourhood Planning Body's approach to identifying settlement boundaries and that this should fall to the Local Plan. Having attended the Examination in Public of the Local Plan, we are aware that there is a commitment to undertake a review of the Local Plan commencing in January 2018 or no later than three months after the adoption of the Plan. This would be in response to North West Leicestershire's housing requirement increasing following the completion of a Memorandum of Understanding on meeting housing needs.</p> <p>We therefore consider that Policy S1 should account for potential additional development that may</p>	<p>The NP incorporates a review mechanism which will be triggered if the Local Plan itself is reviewed and if housing need increases.</p> <p>Land outside of the LtD is to be treated as countryside and the Parish Council sees no reason to change this in the face of speculative development proposals.</p>	None.

				<p>be required beyond settlement boundaries and the following text added:</p> <p>"POLICY S1: ELLISTOWN LIMITS TO DEVELOPMENT - In order to make a positive contribution to sustainable development and help meet local needs, future development proposals in the Neighbourhood Plan Area shall be focused within the built-up area of Ellistown as defined in Fig 2 by the Limits to Development. <b>Additional sites outside of the Limits to Development shall</b> be considered in accordance with the presumption in favour of sustainable development <b>in the event a review of the Local Plan requires the identification of further sites to meet development needs.</b>"</p>		
3		Section 1.5	GDL	<p>The supporting text to Policy S2 sets out the correct quote from paragraph 17 (bullet 5) of the Framework; however, we note Policy S2 then sets out a different policy test of conserving countryside for the sake of its intrinsic character and beauty, which is similar to the previous national guidance contained</p>	<p>Policy S2 is to be amended following this and other responses to this consultation.</p>	<p>Policy to be changed to 'Land within the Neighbourhood Plan boundary but outside the Ellistown Limits to Development, as in Figure 2, is identified as countryside, where development will be carefully controlled in</p>

				<p>in PPS7, which sought to protect countryside for its own sake.</p> <p>We therefore consider the policy should be re-worded so it is in conformity with the Framework, so it states:</p> <p>"POLICY 52: LAND OUTSIDE OF ELLISTOWN LIMITS TO DEVELOPMENT - Land outside the Ellistown Limits to Development, as identified in Figure 2, is identified as countryside which <b>shall be recognised for</b> its intrinsic character and beauty ... "</p>		line with local and national strategic planning policies'.
3		Section 2.2	GDL	<p>The Neighbourhood Plan currently states in the second paragraph on page 24, 'The North West Leicestershire Local Plan is required to make provision for at least 10,700 new homes to be built across the District by 2031. <b>The Neighbourhood Plan must be in conformity with this Local Plan and its contents.</b>' (emphasis added).</p> <p>As set out above, this statement is not correct, as Neighbourhood Plans should be prepared in conformity with the Development Plan for the area, which is the 2006 Local Plan. If the Neighbourhood Plan is to be</p>	<p>The text has been clarified to reinforce the need for the NP to be in general conformity with the Adopted Local Plan, whilst taking the evidence from the emerging Local Plan into account.</p>	Text reinforced as indicated.

			<p>prepared to be in conformity with the emerging Local Plan, it would therefore be appropriate to await the adoption of that Plan to ensure it will meet the basic conditions set out in the Regulations.</p> <p>In respect of Policy H2, we consider that as the Policy pertains specifically to windfall development, the first sentence of the Policy stating the housing provision has been met, is not required and should be deleted. This would provide a positively worded and more succinct policy for the control of windfall sites.</p> <p>In addition, we consider the additional text at the end of the policy would be appropriate:</p> <p>Additional development sites outside of the Limits to Development shall be considered in accordance with the presumption in favour of sustainable development in the event a review of the Local Plan requires the identification of further sites to meet development needs."</p>	<p>The Parish Council considers that the Windfall policy is correct as worded. The Parish has witnessed a disproportionately high level of housing and wishes to control further development.</p> <p>The Neighbourhood Plan states that development outside of the Limits to Development will be treated as countryside, and in line with local and national policies</p>	<p>None</p> <p>None</p>
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3			GLD	<p>We note the final section of the Draft Neighbourhood Plan sets out that the plan will be reviewed on a regular basis. Taking account of the points made in this representation regarding the parent strategy against which the document has been drafted and the potential need for a review to take account of changes, we recommend that the outcome of the Local Plan is clear before the Neighbourhood Plan progresses further to ensure it is as up to date as possible and so that it does not fail the basic conditions tests at examination.</p> <p><b>Summary</b></p> <p>We hope the above comments are helpful and we trust they will be taken in to account. We would be happy to discuss them further with you if that would be of assistance.</p>	<p>Legislation is clear that NPs can come forward prior to the Adoption of Local Plans, but need to be based on the most up to date evidence that is available. The NP satisfies this requirement.</p> <p>Noted</p>	<p>None</p> <p>None.</p>
4			Highways England	<p>Highways England welcomes the opportunity to comment on the draft consultation for the Ellistown and Battleflat Neighbourhood Plan that covers the period 2015-2031 and has been produced for public consultation. It is noted that the document provides a vision for the</p>	<p>Noted</p>	<p>None</p>

			<p>future of the Parish of Ellistown &amp; Battleflat and sets out a number of key objectives and planning policies which will be used to help determine planning applications.</p> <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 the role of Highways England to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Ellistown &amp; Battleflat Neighbourhood Plan, Highways England's principal interest is safeguarding the operation of the M1, with M1 J22 being located approximately 3 miles to the east and the A42 which runs 8 miles to the west of the Neighbourhood Plan area.</p> <p>We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the</p>	<p>The NP is required to be in general conformity with the Adopted Local Plan</p>	<p>None</p>
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			<p>Neighbourhood Plan for Ellistown &amp; Battleflat is required to conform with the emerging North West Leicestershire Local Plan and this is acknowledged within the document.</p> <p>We note that the Neighbourhood Plan makes reference to the South East Coalville Development Scheme (SECDS), which will deliver a total of 3,500 new dwellings in the area, with 1,900 of these allocations to be built during the Plan period. However we consider that the Plan could benefit from more clarity regarding the housing numbers being put forward; page 21 of the consultation document states that “around a thousand” of the 3,500 dwellings will come forward across the Parish whilst page 23 of the Plan states that 1,400 dwellings will come forward. Furthermore it is not clear how many dwellings will come forward in the Parish across the Plan period.</p> <p>Policy S3 makes reference to mitigation in relation to the SECDS; outlining measures will be taken to reduce traffic impacts on the village centre. It is further detailed in the Neighbourhood Plan that mitigation will occur by moving traffic and</p>	<p>The delivery figures for the SECDS have become clearer in the time between the pre-submission version of the NP and the consideration of these comments. The NP has duly been updated to reflect the latest position.</p> <p>Noted. The measures in the draft policy S3 have been amended to take into account the provision within the planning approval for SECDS.</p>	<p>SECDS delivery figures have been updated in the Submission version of the NP.</p> <p>Policy updated to reflect the infrastructure provisions contained within the planning approval.</p>
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			<p>vehicle movements on to the motorway network.</p> <p>Following the announcement on the Leicester and Leicestershire LEP Growth Deal 2014 there is an expectation that schemes at M1 Junction 22 and A42 Junction 13 will be delivered by Leicestershire County Council (LCC) using Growth Deal funding.</p> <p>Various discussions have been held between North West Leicestershire District Council (NWLDC), Leicestershire County Council (LCC) and Highways England to provide clarity over the potential delivery of A42 J13 and M1 J22 infrastructure and the implications for proposed developments in the area which will have traffic impacts on these junctions. It is considered that without these infrastructure schemes in place this development would give rise to unsatisfactory impacts on the SRN.</p> <p>We recognise that aside from the SEDCS, the Parish has already met its housing allocation for the Plan period and as such any future developments are likely to come through small-</p>	<p>Noted. The reference in the comment made to 30 additional dwellings is not clear and is assumed to be a cut and paste error in the comment made through this process.</p>	<p>None.</p>
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				<p>scale or infill windfall sites. It is recognised in Policy H2 that each of these sites are to be small-scale, with only an additional 30 dwellings potentially to be built in the Parish during the Plan period. With regard to these developments, we consider these will not impact upon the operation of the SRN.</p> <p>Highways England has no further comments to provide, and trust the above is useful in the progression of the Ellistown &amp; Battleflat Neighbourhood Plan.</p>		
5			Historic England	<p>Thank you for consulting Historic England about your draft Neighbourhood Plan.</p> <p>Having considered the proposals we do not consider that there is a need for Historic England to be involved in the development of the strategy for your area at this time. However in light of the heritage assets that are in the area, we consider that the conservation officer at North West Leicestershire District Council is the best placed person to assist you in the development of your Neighbourhood Plan. They can help you to consider how the strategy</p>	Noted	None

			<p>might address the area's heritage assets.</p> <p>You might also consider contacting the staff at Leicestershire County Council who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any designated heritage assets but also locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (<a href="http://www.heritagegateway.org.uk">www.heritagegateway.org.uk</a> &lt;<a href="http://www.heritagegateway.org.uk">http://www.heritagegateway.org.uk</a>&gt;). It may also be useful to involve local voluntary groups such as the local Civic Society, local history groups, building preservation trusts, etc. in the production of your Neighbourhood Plan.</p> <p>Your local authority might also be able to provide you with more general support in the production of your Neighbourhood Plan. National Planning Practice Guidance is clear that where it is relevant, Neighbourhood Plans need to include enough information about</p>		
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			<p>local heritage to guide planning decisions and to put broader strategic heritage policies from your local authority led local plan into action at a neighbourhood scale. If appropriate this should include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions.</p> <p>Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England. This signposts a number of other documents which your community might find useful 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> <p><a href="http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">http://www.historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a></p> <p>If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.</p>		
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6		General comments	LCC	<p>Affordable housing policy could be strengthened, specifically tailored to Ellistown's future requirements. For example Houghton's Draft Plan promotes bungalows for elderly residents to downsize to (see policies H1&amp;2) and Waltham &amp; Thorpe Arnold's Draft Plan details affordable housing provision requirements (see policy H3). Other plans specify developers promote to local residents and only if they demonstrate that no local need exists are the homes advertised to the open market.</p> <p>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.</p> <p>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</p>	<p>Noted. The reference to housing mix is made in the policy on housing mix (policy H3), but the affordable housing policy will be strengthened to reference this.</p> <p>Noted</p>	<p>Policy to be changed to 'Development proposals which include affordable housing should provide a mix of housing types and sizes to help meet the identified needs of the Parish. The provision of smaller homes, especially for young families and young people and for older people who wish to downsize, will be supported, as is the provision of affordable housing for people with a local connection'.</p> <p>None</p>
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			<p>(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 <b>fully</b> 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.</p> <p>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.</p> <p>Where potential S106 measures would require future maintenance, which would be paid for from the</p>		
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				<p>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 provide as a commuted sum.</p> <p>With 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 i.e. they would be able to operate without being supported from public funding.</p> <p>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</p>		
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				<p>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.</p>		
6		Highways	LCC	<p>Policy S3 - "South East Coalville is already permitted as a development, so anything would have to fall in line in accordance with the decision notice – the Local Planning Authority should advise on this. In particular, 'signage directing traffic away' is unlikely to be consistent with the decision notice".</p>	<p>Noted. Policy updated in line with the decision notice.</p>	<p>Policy amended as indicated.</p>
6		Flood risk management	LCC	<p>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</p>	<p>Noted</p>	<p>None</p>

				<p>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 ensures that flood risk to the site is accounted for when designing a drainage solution.</p> <p>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.</p> <p>When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points:</p>		
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			<p>Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)).</p> <p>Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map).</p> <p>Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding.</p> <p>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.</p> <p>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</p>		
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				<p>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.</p> <p>Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing watercourses and land drainage (including watercourses 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.</p> <p>LCC in our role as LLFA will object to anything contrary to LCC policies.</p>		
6		Planning	LCC	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	This general comment is noted. Infrastructure requirements are noted in the policy on SECDS (Policy S3)	None

				<p>inclusion of a developer contributions/planning obligations policy, along similar lines to those shown for example in the Draft North Kilworth NP and the draft 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.</p>		
6		Mineral and waste planning		<p>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.</p> <p>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</p>	Noted.	None.

				<p>any future development planned for your neighbourhood.</p> <p>You should also be aware of Mineral Consultation Areas, contained within the adopted Minerals Local Plan and Mineral and Waste Safeguarding proposed in the new <a href="#">Leicestershire Minerals and Waste Plan</a>. These proposed safeguarding areas and existing Mineral Consultation Areas are there to ensure that non-waste and non- minerals development takes place in a way that does not negatively affect mineral 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.</p>		
6		Education	LCC	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	Noted	None

				<p>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 development, or the size of a development would yield a new school. 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>		
6		Adult social care	LCC	<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>Noted. The NP makes reference to an ageing population and this is reflected in its policies on housing mix and affordable housing.</p>	None.
6		Environment	LCC	<p>With regard to the environment and in line with the Governments advice, Leicestershire County Council (LCC) would like to see Neighbourhood</p>	<p>These general comments which are non-specific to the NP are noted.</p>	None.

			<p>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><b>Climate Change</b>  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><b>Landscape</b>  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</p>		
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			<p>communities, further advice can be found in the latest 'Streets for All East Midlands' Advisory Document (2006) published by English Heritage.</p> <p><b>Biodiversity</b>  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. 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>		
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			<p>The Leicestershire and Rutland Environmental Records Centre (LRERC) can provide a summary of wildlife information for 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:  <a href="mailto:planningecology@leics.gov.uk">planningecology@leics.gov.uk</a>, or  phone 0116 305 4108</p> <p><b>Green Infrastructure</b>  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</p>	
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				<p>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.</p> <p>Looking at the existing provision of GI networks within a community can influence the plan for creating &amp; 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>		
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				<p>Neighbourhood Plan groups have the opportunity to plan GI 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>		
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**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

			<p>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>		
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				<p><b>Impact of Development on Civic Amenity Infrastructure</b></p> <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>		
6		Communities	LCC	<p>Consideration of community facilities in the draft Plan would be welcomed. We would suggest where possible to include a review of community facilities, groups and allotments and their importance with your community. Consideration could also be given to policies that seek to protect and retain these existing facilities more generally, support the</p>	<p>The NP considers community facilities as suggested.</p>	<p>None.</p>

				<p>independent development of new facilities and relate to the protection of Assets of Community Value and provide support for any existing or future designations.</p> <p>The identification of potential community projects that could be progressed would be a positive initiative.</p>		
6		Economic development	LCC	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.	Economic development aspirations are included in the NP	None.
6		Superfast broadband	LCC	<p>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 superfast broadband (of at least 30Mbps) Developers should take active steps to incorporate superfast broadband at the pre-planning phase and should engage with telecoms providers to ensure superfast broadband is available as</p>	Broadband speeds are considered satisfactory in the Parish.	None.

				soon as build on the development is complete. Developers are only responsible for putting in place broadband infrastructure for developments of 30+ properties. Consideration for developers to make provision in all new houses regardless of the size of development should be considered.		
6		Equalities	LCC	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 view at: <a href="http://www.leicestershire.gov.uk/sites/default/files/field/pdf/2017/1/30/equality_strategy2016-2020.pdf">www.leicestershire.gov.uk/sites/default/files/field/pdf/2017/1/30/equality_strategy2016-2020.pdf</a>	Noted	None
7			National grid	National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.  About National Grid:	Noted	None

			<p>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customer. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p>Specific Comments</p>		
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			<p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines and also National Grid Gas Distribution's Intermediate / High Pressure apparatus.</p> <p>National Grid has identified the following high voltage overhead powerlines as falling within the Neighbourhood area boundary:</p> <p>ZL Route – 275kV from Ratcliffe on Soar substation in Rushcliffe to Coventry substation in Coventry</p> <p>From the consultation information provided, the above overheads powerline does not interact with any of the proposed development sites.</p> <p><u>Gas Distribution – Low / Medium Pressure</u></p> <p>Whilst there is no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in</p>		
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				relation to the Gas Distribution network please contact <a href="mailto:plantprotection@nationalgrid.com">plantprotection@nationalgrid.com</a>		
8			Natural England	<p>Thank you for your consultation on the above dated 07/08/2017.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p><b>Natural England does not have any specific comments on this draft neighbourhood plan.</b> However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p>	Noted	None

				<p>For clarification of any points in this letter, please contact me on 02080261940. For any further consultations on your plan, please contact:</p> <p><a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>.</p>		
8		Annex 1 - Sources	Natural England	<p>The <a href="#">Magic</a><sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: <b>Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)</b>. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available <a href="#">here</a><sup>2</sup>. <b>Priority habitats</b> are those habitats of particular importance for nature conservation, and the list of them can be found <a href="#">here</a><sup>3</sup>. Most of these will be mapped either as <b>Sites of Special Scientific Interest</b>, on the</p>	Noted	None

			<p>Magic website or as <b>Local Wildlife Sites</b>. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.</p> <p><b>National Character Areas (NCAs)</b> divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found <a href="#">here</a><sup>4</sup>.</p> <p>There may also be a local <b>landscape character assessment</b> covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.</p> <p>If your neighbourhood planning area is within or adjacent to a <b>National Park</b> or <b>Area of Outstanding Natural Beauty (AONB)</b>, the relevant National Park/AONB Management Plan for the area will set out useful information</p>		
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				<p>about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.</p> <p>General mapped information on <b>soil types</b> and <b>Agricultural Land Classification</b> is available (under 'landscape') on the <a href="#">Magic</a><sup>5</sup> website and also from the <a href="#">LandIS website</a><sup>6</sup>, which contains more information about obtaining soil data.</p>		
8		Annex 1 - issues	Natural England	<p>The <a href="#">National Planning Policy Framework</a><sup>7</sup> sets out national planning policy on protecting and enhancing the natural environment. <a href="#">Planning Practice Guidance</a><sup>8</sup> sets out supporting guidance. <u>Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.</u> <a href="#">Landscape</a></p> <p>Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and</p>	Noted	None

			<p>think about how any new development proposals can respect and enhance local landscape character and distinctiveness. If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.</p> <p><u>Wildlife habitats</u> Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed <a href="#">here</a><sup>9</sup>), such as Sites of Special Scientific Interest or <a href="#">Ancient woodland</a><sup>10</sup>. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.</p> <p><u>Priority and protected species</u> You'll also want to consider whether any proposals might affect priority species (listed <a href="#">here</a><sup>11</sup>) or protected</p>		
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				<p>species. To help you do this, Natural England has produced advice <a href="#">here</a><sup>12</sup> to help understand the impact of particular developments on protected species.</p> <p><u>Best and Most Versatile Agricultural Land</u></p> <p>Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of <a href="#">biodiversity</a> and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication <a href="#">Agricultural Land Classification: protecting the best and most versatile agricultural land</a><sup>13</sup>.</p>		
8		Annex 1 – Improving your natural environment	Natural England	Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or	Noted	None

				<p>new features you would like to see created as part of any new development. Examples might include:</p> <p>Providing a new footpath through the new development to link into existing rights of way.</p> <p>Restoring a neglected hedgerow.</p> <p>Creating a new pond as an attractive feature on the site.</p> <p>Planting trees characteristic to the local area to make a positive contribution to the local landscape.</p> <p>Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.</p> <p>Incorporating swift boxes or bat boxes into the design of new buildings.</p> <p>Think about how lighting can be best managed to encourage wildlife.</p> <p>Adding a green roof to new buildings.</p> <p>You may also want to consider enhancing your local area in other ways, for example by:</p> <p>Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.</p> <p>Assessing needs for accessible greenspace and setting out proposals</p>		
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				<p>to address any deficiencies or enhance provision.</p> <p>Identifying green areas of particular importance for special protection through Local Green Space designation (see <a href="#">Planning Practice Guidance on this</a><sup>14</sup>).</p> <p>Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).</p> <p>Planting additional street trees.</p> <p>Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.</p> <p>Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).</p>		
9		Need for NP	Wilson Bowden	<p>In our view, it is inappropriate for 'expectations' to be set for only 'small scale' development during the plan period. The NP contains no definition of what constitutes small scale and, in any event, in the context of the area lying within a defined 'Growth Corridor' in the LEP's current 'Strategic Economic</p>	<p>We disagree. There will be significant growth in the Parish over the Plan period as a result of SECDS and approvals already made. It is appropriate therefore to restrict further development above this to windfall/infill development</p>	None

				Plan', it is inappropriate for such a reference to be included.	and this is accepted by the Local Planning Authority.	
9		What the NP can achieve	Wilson Bowden	In our view, the NP must recognise the District Council's acceptance that an early 'review' of its own Local Plan is now required and is inevitable. The Main Modifications to the District's Local Plan commit to an early 'review' (beginning in early 2018), hence if the NP is to progress, it must, as a minimum, follow this commitment.	The NP incorporates a review which will mirror any review of the Local Plan.	None.
9		Directing development to most sustainable location	Wilson Bowden	We support the NP's acknowledgement relating to directing development to the most sustainable locations. However, in our opinion the NP does not then go on to recognise / address just where these locations are. The Strategic Economic Plan expressly defines the A511 corridor as the Coalville Growth Corridor, confirming it as a location of choice for additional sustainable growth and infrastructure spending. Coalville is also one of Leicestershire's main towns. The NP must acknowledge these circumstances as significant influences in identifying sustainable locations for development within the boundaries of the NP.	The NP recognises the Limits to Development which demarcate where development is considered appropriate, in certain circumstances, and where development is deemed less appropriate, i.e. the countryside.	None.
9		Limits to development	Wilson Bowden	In our view, any discussion, commentary and/ or policy formulation relating to defining limits	The NP does not define its own Limits to Development as is stated in this comment	None.

				<p>of development must always acknowledge the need for development. The NP does not do this. The District Council's Local Plan already accepts that further growth (and therefore, the release of land for development), as signaled by the substantive evidence base of the Leicestershire HEDNA study, will be required in the near future. Moreover, the Local Plan also accepts that a formal 'review' is already imminent. In such circumstances, seeking to set limits for development can only be a short term temporary measure. Hence, and especially having regard to the sustainability credentials of the locality and its identification as a growth corridor, we do not consider that the NP should be defining limits for development. Policies S1 and S2 and their supporting text should therefore be reconsidered in the light of this.</p>	<p>– it recognises the LtD which are introduced by NWLDC.</p>	
9		Employment and economy p29-31.	Wilson Bowden	<p>We welcome the support given to existing employment sites and buildings within the NP area (as referred to in proposed policies E1 and E2), however, in the context of the District's Local Plan, which accepts:-</p>	<p>Noted. The NP provides general support for economic development and recognises the significant economic development activity that has been planned and approved in the Parish over recent years.</p>	None.

				<p>a 29 Ha shortfall in the provision of employment land in the District's area; the need for an early review of the Plan; and,</p> <p>the inclusion of a new criteria-based policy which accepts that the release of new employment development / land in sustainable locations (Policy Ec2 (2)) will be considered 'favourably' in 'appropriate locations',</p> <p>we consider that, as a minimum, if the NP proceeds, then the NP needs a new policy to reflect the currently proposed Main Modification 40 of the District's Local Plan (June 2017). Moreover, in terms of positively addressing the employment need profile, as well as the approved planning backdrop (with its defined growth corridor status), we consider that there is actually an opportunity for the NP to pick-up the (now) accepted employment land shortfall, and actually identify an additional development site(s). One such candidate, in a highly sustainable location, being the Aggregate Industries site, fronting the A511 at the junction of Regs Way. (see attached location plan for information).</p>		
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				We would, of course, be happy to discuss any aspects of the above comments with the Parish Council. In the meantime, we look forward to being kept informed of progress on the NP in duecourse.		
10		Page 8	NWLDC	It is likely that the Local Plan will be adopted before the Neighbourhood Plan is 'made'.	Noted. Text changed to reflect this.	Text amended to reflect the likelihood of the LP being adopted before the making of the NP.
10		Page 12	NWLDC	'However, if there is a conflict with existing non-strategic policies in the Local Plan, the Neighbourhood Plan policies will take precedence'.  Is this the case? The PPG advises that where there is a conflict then "that conflict must be resolved in favour of the policy which is contained in the last document to become part of the development plan"	Agreed.	Reference deleted.
10		Page 14	NWLDC	Advise that the new Local Plan is referred to as 'Local Plan (as proposed to be modified)' although this may need to be amended if it has been adopted before submission of this Neighbourhood Plan.	Agreed.	Reference to the emerging Local Plan to be amended as proposed.
10		Page 16	NWLDC	There is no Policy number. It is not essential to include a policy on the presumption in favour of sustainable development.	Noted. In any event, the policy is to be deleted and the text placed in the narrative above.	Policy deleted.
10		Page 16	NWLDC	This should be Policy S2	Agreed.	Reference changed as proposed.

10		Page 16	NWLDC	Quote is incorrect, it should read "The following Settlement Hierarchy will be used when assessing the suitability of a settlement for new development, with the general principle being that those settlements higher up the hierarchy will take more growth than those lower down and that the type of development proposed is appropriate to the scale and character of the settlement and its place in the hierarchy".	Agreed.	Reference changed as proposed.
10		Page 19	NWLDC	If this is referring to the Amazon development, it is now complete and it may be better to refer to 'a recent development has included a significant employment scheme adjacent to the built up area of Ellistown'	Agreed.	Wording incorporated as proposed.
10		Page 19/20	NWLDC	Not sure if this explanation is necessary, if it is kept in it would need to be re-worded as the Limits to Development have been reviewed and published by the District Council.	Agreed.	Reference to the Limits to development to be updated
10		Page 20	NWLDC	Should this be Development should be focused 'within the Limits to Development' as Ellistown is identified as a sustainable village in the Settlement Hierarchy and is therefore deemed to be sustainable.	Agreed	Words changed as proposed.
10		Page 20	NWLDC	Comment relates to Policy S2 – The NPPF (para.109) refers to 'Valued	Agreed.	Policy S2 changed to 'Land within the

				landscapes' there doesn't appear to be any evidence identifying particular 'valued landscapes' question whether Policy S2 would be compliant with the NPPF.		Neighbourhood Plan boundary but outside the Ellistown Limits to Development, as in Figure 2, is identified as countryside, where development will be carefully controlled in line with local and national strategic planning policies'.
10		Page 23	NWLDC	Many of these have already been addressed through the permission including: new bus routes and infrastructure, a network of footpaths through the site, the provision of ecological and biodiversity mitigation land, affordable housing, areas of public open space, a sum allocated for the provision and improvement of the formal recreation provision at South Street Recreation Ground and a civic amenity contribution.	Agreed. Policy to be updated to reference the planning approval obtained.	Policy amended to reflect the planning approval.
10		Page 23	NWLDC	Page 21 refers to around 1,000 dwellings (at South East Coalville) being within the Parish. There will be around 1,600 dwellings on South East Coalville within the Parish.	Noted.	Numbers updated as proposed.
10		Page 23	NWLDC	Although some of these dwellings are likely to be built after 2031.	Noted.	Text amended as proposed.
10		Page 24	NWLDC	This should be 9,620	Noted.	Revised figure inserted.

10		Page 24	NWLDC	<p>The Neighbourhood Plan must be in conformity with this Local Plan and its contents. This includes ensuring that the Parish makes its full and proper contribution to meeting this target ‘</p> <p>Not sure this section is needed as the Neighbourhood Plan (NP) states at the beginning that the NP needs to be in conformity with the Strategic policies of the Local Plan and the Local Plan does not identify housing requirements for individual Parishes.</p>	Agreed.	Section deleted.
10		Page 24	NWLDC	This should be 9,600 new homes	Noted.	Revised figure incorporated.
10		Page 25	NWLDC	Would this paragraph about new housing be better in the affordable housing section?	The statement also covers private housing so it is considered appropriate to be placed here.	None.
10		Page 26	NWLDC	Should this be Policy H1?	Yes.	Policy numbering updated.
10		Page 26	NWLDC	What is the minimum housing provision referring to? There is no specific housing requirement for Ellistown and Battleflat	Agreed.	Policy amended to reflect this.
10		Page 26	NWLDC	The Local Plan (as proposed to be modified) identifies affordable housing requirements for both greenfield and brownfield sites	Noted.	Policy wording amended as proposed.
10		Page 26	NWLDC	Wording implies that 30% of the proportion of the south east Coalville development within Ellistown will be	Noted.	Policy wording changed to remove specific target.

				affordable. The Section 106 Agreement has an agreed affordable housing mix of 7.6% to meet the housing needs of the district not just the parish.		
10		Page 27	NWLDC	In regards to affordable housing provision on the south east Coalville site the Section 106 has already been agreed and cannot be amended. The Section 106 Agreement does not specify that the affordable housing will be restricted to residents in any area but will help meet the wider affordable needs of the district. Whilst the council's Strategic Housing team would be supportive of requesting, on advertisement, the preference would be given to applicants with a local connection to the Parish and restriction to give priority would be beyond the remit of the Neighbourhood Plan on already agreed sites with signed Section 106 Agreements.	Noted.	Policy wording amended to reflect support for a local connection policy but not require one to be introduced.
		27	NWLDC	The council would generally look at housing need from within parishes as a starting point on all applications (particularly small windfall sites) but to base housing need solely on parish need on larger applications (irrespective of which parish) would generally result in lower recorded	Noted. Policy wording on local connection availability for affordable housing amended to reflect support for this rather than it be 'prioritised'.	Policy amended as proposed.

				need – which would undermine delivery across the wider district area		
		27	NWLDC	Registered Providers have continuously indicated that restricting properties to village/settlement areas impacts on their ability to obtain funding at comparable levels to schemes where no restrictions are attached.	Noted. As above.	As above.
10		Page 29	NWLDC	As there is no specific need identified should this just refer to meeting ‘the needs’ and ensuring a balanced community?	Noted.	Wording amended as proposed.
10		Page 27	NWLDC	Unsure that 36% can be classed as a ‘majority’ (rather the greatest proportion?) maybe just refer to 36% of residential dwellings as being detached?	Agreed.	Wording amended as proposed.
10		Page 27	NWLDC	There is no reference to Lifetime Homes Standards in the Local Plan	Noted.	Reference to the Local plan removed.
10		Page 29	NWLDC	No issue with developers providing reports to NWLDC and the Parish justifying the proposed housing mix, but the District Council as the strategic housing authority should be the authority to either agree or renegotiate the mix proposed based on identified housing need figures from rural needs surveys, housing register, HEDNA or any other returns to best meet the needs of the Parish and district.	Noted. Wording to be amended to better reflect this.	Policy wording changed to ‘Housing development proposals should provide a mix of housing types, sizes and tenures to help meet the identified needs of the Parish. The provision of smaller homes, especially for young families and young people and for older people who wish to

						downsize, will be supported’.
10		Page 29	NWLDC	Employment development off Beveridge Lane - this has now been completed.	Noted.	Text amended as proposed.
10		Page 29	NWLDC	‘Levels of economic activity in the Parish are also high, with above average numbers of people in employment. However, many people in the Parish struggle to find employment’. As worded this paragraph is contradictory.	Noted. Final section of the paragraph to be deleted.	Delete ‘However, many people in the Parish struggle to find employment’.
			NWLDC	If every settlement restricts the affordable housing to local residents it would impact on the Council’s ability to match applicants, eg elderly/disabled, special needs, to suitable available housing on health grounds.	Noted. The policy reflects support for a local connection policy (as is the case with the NWLDC exception site policy) but doesn’t make this a requirement.	No further amendments proposed.
10		Page 30	NWLDC	Comments relate to Policy E1 – unsure which sites the plan supports the retention of – are these identified on a map?	The NP supports all existing employment opportunities and seeks their retention	None.
10		Page 30	NWLDC	What are these and where are they identified?	Noted. Text relating to the identification of specific sites removed.	Text amended as proposed.
10		Page 31	NWLDC	The Policy refers to “the conversion of buildings to other uses” does this mean other employment uses rather than any other use?	Policy amended as identified.	Policy extended as follows: ‘New employment-generating opportunities will be supported where it: a) Falls within the boundary of the limits of

						<p>development unless it relates to small scale leisure or tourism activities, or other forms of commercial/employment related development appropriate to a countryside location or there are proven exceptional circumstances; and</p> <p>b) Reuses land or buildings wherever possible; and</p> <p>c) Is of a size and scale not adversely affecting the character, infrastructure and environment of the village itself and the neighbourhood plan area, including the countryside; and</p> <p>d) Does not involve the loss of dwellings; and</p> <p>e) Does not increase noise levels to an extent that they would unacceptably disturb occupants of nearby residential property; and</p>
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						<p>f) Does not generate unacceptable levels of traffic movement; and</p> <p>g) Contributes to the character and vitality of the local area; and</p> <p>h) Is well integrated into and complement existing businesses. The following types of employment development will be supported:</p> <p>a) The small-scale expansion of existing employment premises across the Parish;</p> <p>b) Small-scale new build development within the Limits to Development.</p>
10		Page 32	NWLDC	This section does not make reference to how close Ibstock and Coalville are to Ellistown	Noted. Reference to Ibstock and Coalville incorporated.	Text amended as proposed.
10		Page 32	NWLDC	'It lacks, however, the range and number of shops and community facilities that you would typically expect to find in a Parish of its size'. Have there been any comparisons done with other similar sized parishes to quantify this statement?	Reference amended to Ellistown lacking the facilities available in neighbouring Ibstock and Coalville.	Text amended as proposed.

10		Page 32	NWLDC	This study did not look at under provision of services and/or facilities – it looked at the facilities in each settlement at the time it was undertaken – it did not highlight any over or under provision of services.	Noted.	Reference removed.
10		Page 37	NWLDC	Ref Local Green Space - there is no criteria set out in the Local Plan.	Noted.	Reference to local criteria removed from text.
10		Page 37	NWLDC	Unsure as to how these have been arrived at – was there a methodology/justification for the identification of Local Green Spaces?	Noted.	A report describing the LGS is available in the supporting information.
10		Page 38	NWLDC	What are the exceptional circumstances? Maybe better to say that development would not be permitted.	Noted.	Policy wording amended to say 'The following sites (Figure 4) are designated as Local Green Spaces, where development is ruled out other than in very special circumstances' to better align with the NPPF.
10		Page 36	NWLDC	This is also number 15. Should this be Kendal Place/Sherwood Close?	Agreed	LGS scoring reviewed and reduced number of sites proposed.
10		Page 36	NWLDC	Unsure as to why these two have been identified?	Noted. On reflection these two sites have been deleted.	Delete
10		Page 40	NWLDC	Comment relates to Policy NE2 – consider that we perhaps need these sites identifying?	The policy seeks to preserve and enhance bio-diversity across the Plan area. Specific sites are identified in the policy.	None.

10		Page 40 Policy NE3	NWLDC	The previous version of the policy included the need for trees and hedgerows to be incorporated in to the design of development	Noted. Policy to be amended.	Addition to policy NE 3 'Wherever possible the planting of trees and hedgerows should be integrated into the design of development proposals'.
10		Page 40	NWLDC	Although the exterior of the building has largely been maintained the Hotel has been redeveloped for flats and a local shop	Noted. Wording changed as indicated.	Wording changed to ... 'These include the exterior of what was the New Ellistown Hotel ...'
10		Page 40	NWLDC	The Council has prepared a draft 'list of local heritage assets' which should be made available for public consultation in October. The draft includes the Church of St Christopher at Ellistown. In July 2016 the Council invited the Parish Council to nominate sites for inclusion on the 'list of local heritage assets' but received no reply.	Noted. The PC has chosen the NP as the route to designating local heritage assets.	None.
			NWLDC	The Council's Senior Conservation Officer identifies that local listing is the responsibility of the local planning authority. The NPPF indicates that this is the case in Paras. 129, 169 and the Glossary.	NPs can also identify buildings suitable for a local list	None.
10		Page 41	NWLDC	Historic England has issued advice on local heritage listing (2012). The advice states that selection criteria should be prepared prior to the identification and assessment of 'candidate assets'. The draft	The selection criteria used is based on that used by NWLDC and was prepared prior to the assessment of each of the buildings.	None.

				Neighbourhood Plan identifies six “buildings and structures of local Heritage” but there is no indication of the selection criteria used to identify these buildings and structures.		
10		Page 42	NWLDC	Policy HBE1 refers to ‘exceptional circumstances’ – unsure what these would be?	Noted. Policy changed to better reflect national policy.	Policy changed to ‘Development proposals that affect the buildings and structures of local historic or architectural interest listed below, or their setting, will be expected to conserve the historic and architectural interest in those development proposals.’
			NWLDC	The policy refers to ‘non-designated heritage assets’ and also ‘locally important asset’ – are these the same things? Para. 135 of the NPPF states that “The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset”. It maybe that the policy wording of HBE1 is too strong	Policy amended as above.	

				and more in line with the NPPF's requirements for the protection of designated heritage assets rather than non-designated heritage assets.		
10		Page 42	NWLDC	Unsure if this is an accurate representation given that Ellistown is served by two hourly services (Nos. 26 and 159) a two-hourly service (No.120) and a more frequent service (No.15) that provides 3 buses per hour through Ellistown.	Noted. Reference to the frequency of the bus service has been removed	Text amended to reflect the comment made.