

## Summary of Responses Received to Local Plan Review Emerging Options Consultation (November 2018 – January 2019)

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### **Explanation of Acronyms used in document**

**Review** – Local Plan Review

**Consultation** – Emerging Options Consultation (November 2018)

**SGP** – Leicester and Leicestershire Strategic Growth Plan (Adopted December 2018)

**LIG** – Leicester International Gateway (identified in the SGP)

**HMA** – Housing Market Area (comprises all districts of Leicestershire and Leicester City Council)

**NPPF** – National Planning Policy Framework 2018

**NPPG** – Planning Policy Guidance

**NWL** – North West Leicestershire District Council

General Comments	
Respondent 1 <b>Charnwood Borough Council</b>	<p>Welcome the LP Review and encouraged that NWL is reviewing employment and housing land requirement to respond to needs of district and wider HMA.</p> <p>Welcome ongoing Duty to co-operate discussions with all HMA authorities.</p>
Respondent 2 <b>Sport England</b>	<p>As plan is developed, need to ensure Playing Pitch Strategy is reviewed and brought up to date, particularly with regard to housing growth.</p> <p>Given the planned growth and proposals to replace Hermitage leisure centre, it may be a good time to undertake a Built Sports Facilities strategy.</p> <p>Sport England supports section on Health and wellbeing and Objective 1.</p> <p>Would support a reference to Active Design in the policies.</p>
Respondent 5 <b>Historic England</b>	<p>Recommend that local authority conservation expertise should be used in relation to all heritage assets.</p> <p>Historic England have published advice notes. They may be of relevance to the Review. Specifically, Historic Environment Good Practice Advice Note 1: The Historic Environment in Local Plans and Historic Environment and Good Practice Advice Note 3: The Setting of Heritage Assets.</p> <p>Historic England also published a document relating to site allocations in Local Plans which may be of use.</p> <p>Although Historic England have no specific comment to make at this stage on questions 1-12, would strongly welcome early informal consultation regarding potential site allocations. In relation to B8 uses specifically, impact upon heritage assets would require very careful consideration due to the scale and height of these type of uses.</p> <p>Note there is not a corresponding Sustainability Appraisal.</p>
Respondent 10 <b>Highways England</b>	<p>It is stated that irrespective of what the final housing requirement is, the Council will need to ensure that over the plan period the housing requirement is met. Highways England acknowledge this and consider that it would be in alignment with the government's pro-growth agenda, but it would also be important for the Council to ensure that in doing so, there is sufficient infrastructure capacity to accommodate this growth. This includes adequate capacity on the SRN to ensure the safe and efficient operation of the network and we would expect that the impacts from development growth coming</p>

	forward are appropriately assessed. This will allow for any potential impacts on the operation of the SRN to be better understood and relevant mitigation to be identified.
Respondent 11 <b>Erewash Borough Council</b>	Currently have no further comments regarding the Emerging Options Consultation.
Respondent 13 <b>Litton (Donington)</b>	Detailed response relating to land between A453 and M1 which is currently the subject of an undetermined planning application 18/02227/FULM for B1a and B1b uses.
Respondent 22 <b>Mr R Gray</b>	Response relates to Talbot Place, Donisthorpe.
Respondent 23 <b>Harworth Group</b>	These representations on the Local Plan Review – Emerging Options Consultation are made on behalf of Harworth Group plc in relation to their proposals for a new settlement following Garden Village principles on land to the south of East Midlands Airport.
Respondent 24 <b>Gladman Developments</b>	<p>Council should ensure that the results of the SA process conducted through the Review clearly justify any policy choices that are ultimately made, including the proposed site allocations (or any decision not to allocate sites) when considered against ‘all reasonable alternatives.’</p> <p>Joint approach taken by Leicestershire authorities towards housing need is welcomed but level of co-operation and coordination should be maintained, particularly given Leicester’s unmet housing need.</p> <p>Must be recognises that HEDNA methodology is out of date – need to review HEDNA in line with Standard Methodology. Standard Methodology will need to be updated before Council submits Local Plan for Examination. It should also be treated as a starting point/minimum – not a cap that cannot be exceeded. Strong case for significant uplift in NWL based on PPG scenarios. Taking everything into account (including recent high completion rates), housing requirement is likely to be similar, if not higher, than that identified in the HEDNA.</p> <p>Need to recognise SGP strategy. To support delivery of A46 expressway, Leicestershire authorities should consider applying uplift to housing requirement.</p> <p>NWL housing requirement needs to be increased in response to unmet need of Leicester, although recognise that it is not for this Council to predetermine this matter, and the timing for a resolution regarding this is ultimately beyond the control of the Council. Council should work closely with Leicester to establish unmet need to coincide with Local Plan timetable. If this can’t be done then Council should delay submission of Local Plan review, or Council should set out effective policy mechanism to enable unmet needs to be dealt with, such as preparing a separate DPD.</p>

	<p>No discussion in consultation relating to affordable housing despite changes made by new NPPF, including change to definition. Need to reassess level of affordable housing delivery viable in review.</p> <p>Need to include localised policy relating to delivery of houses for first time buyers reflecting Para 71 of NPPF.</p> <p>Council should review all existing allocations, following increased emphasis on delivery in NPPF.</p> <p>Submitted three sites for potential allocation in Ellistown, Coalville and Moira.</p>
<p>Respondent 25 <b>East Midlands Airport</b></p>	<p>The Airport site and the immediate area is an important national and regional economic and employment asset. The Airport is forecast to grow, and it is therefore important that planning policy at all levels recognises this value and that it enables and provides for its future development. The development of the Airport will also reinforce and further strengthen the area surrounding the Airport and the wider North West Leicestershire area as a significant regional economic powerhouse. The local area includes existing employment land allocations at the East Midlands Gateway, the East Midlands Distribution Centre at Castle Donington, land at Sawley Crossroads, and at Donington Park. The economic and employment opportunity that this area, including the Airport, offers should continue to be recognised and provided for in planning, transport and economic policy.</p> <p>The review of the District's Local Plan will need to take account of the development of national policy and the implications and requirements to support and enable the growth of East Midlands Airport. This would be particularly relevant in the review of the existing policy relating to the Airport (Ec4). It is expected that a new Aviation White Paper will be published later in 2019 or early 2020.</p>
<p>Respondent 27 <b>Hallam Land Management (Packington Nook)</b></p>	<p>These representations are made on behalf of Hallam Land Management in relation to their land interests at Packington Nook, Ashby de la Zouch.</p>
<p>Respondent 28 <b>Cadwallader Family</b></p>	<p>Promoting the Land at Grimesgate, Diseworth for formal allocation for residential development.</p> <p>Whilst the Government's recent technical consultation on the standard methodology advocates using the 2014-based ONS data as the demographic baseline for the assessment of local housing need, the Council should proceed with a housing requirement based on the 2018-based ONS housing projections – objective of using 2014 figures is to increase supply nationally but this would have the reverse effect in NWL. Also the Governments approach of using 2014 data is a short term approach only.</p>

	<p>Accepted by a number of Inspectors recently examining other Local Plans with the HMA, that there is currently too much uncertainty for other HMA authorities to increase their housing requirement to accommodate a proportion of any unmet need. It is accepted that altering the housing requirement to include any unmet need, at this stage, would prejudice the work that Leicester City Council is currently undertaking to establish an accurate housing capacity.</p> <p>SGP identifies the northern part of the District (together with the northern part of Charnwood Borough) as the 'Leicestershire International Gateway', this is an area of major employment opportunities and is to be a location for future growth across the County. Strategic housing developments at Loughborough, Ashby and Coalville are considered to be a matter of priority for the future development of the County. However, all of these sites are currently delayed against their anticipated delivery trajectory. Given that the strategic development sites are all delayed in delivery, it is our view that the Local Plan Review needs to identify housing allocations that can deliver housing in the short-term in sustainable locations within the Leicestershire International Gateway to ensure that people can continue to live near to their place of work.</p>
<p>Respondent 29 <b>St Modwen Developments</b></p>	<p>Using 2014 based projections would not put NWL in line with Government objectives and would frustrate new jobs over the plan period. Early consideration should be given to planning for levels of additional housing beyond that potentially emerging as part of the standard methodology for NWL with significant additional housing and flexibility built in to the Local Plan Review housing requirement.</p>
<p>Respondent 30 <b>Intro Crowd</b></p>	<p>These representations on the Local Plan Review are made on behalf of INTRO CROWD in relation to their interest in land at Park Road, Castle Donington.</p> <p>Concerned that the Emerging Options consultation does not tackle the crucial issues for the new local plan – namely the preferred scale and location of future development. Lack of progress on Leicester’s unmet need and publication of Memorandum of Understanding is concern to development industry.</p> <p>Housing requirements detailed in the Standard Methodology are a starting point, local planning authorities will need to consider local circumstances including aspirations for economic growth when establishing their housing requirement for local plans. This is important for NWL where significant employment development at the East Midlands Gateway Rail Freight Interchange and growth at East Midlands Airport will greatly implicate the scale of future housing development that should be planned for in the new Local Plan.</p> <p>Given the scale of employment development focused around the East Midlands Gateway Rail Freight Interchange and East Midlands Airport, it is logical to consider the opportunities for strategic housing growth in this location.</p>
<p>Respondent 33 <b>Richborough Estates</b></p>	<p>Promoting land at Burton Road, Ashby de la Zouch and land at Measham Road, Appleby Magna for residential development.</p>

	<p>Whilst the government will be consulting on changes to the standard methodology, at this point in time the NWLDC housing requirement figure cannot be fixed, however in general terms it is considered likely that it will rise.</p> <p>Redistribution of unmet need across the housing market area will be required and review needs to acknowledge this.</p> <p>Recommended that the Local Plan Review continues to allocate small and medium sites to ensure deliverability across the plan period, due to factors such as the long lead in times for strategic sites. In particular, extensions to existing sustainable settlements should be considered favourably.</p>
<p>Respondent 34 <b>Robert Botham</b></p>	<p>Promoting land at Moira Road, Ashby de la Zouch for residential development.</p> <p>Whilst the government will be consulting on changes to the standard methodology, at this point in time the NWLDC housing requirement figure cannot be fixed, however in general terms it is considered likely that it will rise.</p> <p>Redistribution of unmet need across the housing market area will be required and review needs to acknowledge this.</p> <p>Recommended that the Local Plan Review continues to allocate small and medium sites to ensure deliverability across the plan period, due to factors such as the long lead in times for strategic sites. In particular, extensions to existing sustainable settlements should be considered favourably.</p>
<p>Respondent 35 <b>Mr P Atkinson</b></p>	<p>Promoting land at Coleorton Road, Packington for residential development.</p> <p>Whilst the government will be consulting on changes to the standard methodology, at this point in time the NWLDC housing requirement figure cannot be fixed, however in general terms it is considered likely that it will rise.</p> <p>Redistribution of unmet need across the housing market area will be required and review needs to acknowledge this.</p> <p>Recommended that the Local Plan Review continues to allocate small and medium sites to ensure deliverability across the plan period, due to factors such as the long lead in times for strategic sites. In particular, extensions to existing sustainable settlements should be considered favourably.</p>
<p>Respondent 36 <b>Mr and Mrs B Sutton</b></p>	<p>Relates to land at Breedon on the Hill which is considered suitable and available for development.</p> <p>Whilst the government will be consulting on changes to the standard methodology, at this point in time the NWLDC housing requirement figure cannot be fixed, however in general terms it is considered likely that it will rise.</p>

	<p>Redistribution of unmet need across the housing market area will be required and review needs to acknowledge this.</p> <p>Recommended that the Local Plan Review continues to allocate small and medium sites to ensure deliverability across the plan period, due to factors such as the long lead in times for strategic sites. In particular, extensions to existing sustainable settlements should be considered favourably.</p>
<p>Respondent 37 <b>Western Range</b></p>	<p>Relates to sites which Western Range have an interest in at Chapel Street, Donisthorpe and Church Lane, Whitwick.</p> <p>Concerned that the Emerging Options consultation does not tackle the crucial issues for the new local plan – namely the preferred scale and location of future development. Lack of progress on Leicester’s unmet need and publication of Memorandum of Understanding is concern to development industry.</p> <p>Housing requirements detailed in the Standard Methodology are a starting point, local planning authorities will need to consider local circumstances including aspirations for economic growth when establishing their housing requirement for local plans. This is important for NWL where significant employment development at the East Midlands Gateway Rail Freight Interchange and growth at East Midlands Airport will greatly implicate the scale of future housing development that should be planned for in the new Local Plan.</p>
<p>Respondent 39 <b>David Wilson Homes (East Midlands)</b></p>	<p>The responses are related specifically to the promotion of Land East of Abney Drive, Measham.</p> <p>Plan review is focused on a number of very specific issues. It is unclear why these specific issues have been included in the consultation without consideration of matters such as the housing requirement and options for the development strategy, which will be fundamental to the development of the Local Plan. In particular, we would encourage the Council to work with Leicester City Council and other stakeholders to develop an evidence base in relation to the city’s unmet housing need which will be a key consideration in developing the Local Plan.</p> <p>It is expected that there will be a full review of strategic issues, including housing numbers and the development strategy to assess whether Local Plan policies remain up-to-date. This review should consider the criteria set out in the Planning Practice. We would therefore expect these matters, particularly housing requirement, to be subject to further consultation.</p>
<p>Respondent 40 <b>Davidsons Developments</b></p>	<p>These representations on the Local Plan Review are made on behalf of INTRO CROWD in relation to their interest in land south of Forest Road, land north of Wainwright Road/East of Forest Road and land at Butt Lane, Blackfordby.</p>



	<p>Concerned that the Emerging Options consultation does not tackle the crucial issues for the new local plan – namely the preferred scale and location of future development. Lack of progress on Leicester’s unmet need and publication of Memorandum of Understanding is concern to development industry.</p> <p>Housing requirements detailed in the Standard Methodology are a starting point, local planning authorities will need to consider local circumstances including aspirations for economic growth when establishing their housing requirement for local plans. This is important for NWL where significant employment development at the East Midlands Gateway Rail Freight Interchange and growth at East Midlands Airport will greatly implicate the scale of future housing development that should be planned for in the new Local Plan.</p> <p>Given the scale of employment development focused around the East Midlands Gateway Rail Freight Interchange and East Midlands Airport, it is logical to consider the opportunities for strategic housing growth in this location.</p>
<p>Respondent 42 <b>Parker Strategic Land</b></p>	<p>Representations written in the context of development potential available at Shepherds Green, Ibstock.</p> <p>LPA may need to consider whether 2036 is the appropriate or realistic end date; to meet the NPPF would require the Review to be prepared and complete by 2021 and only then it would have the bare 15 years.</p> <p>It is important the Government’s standard method for calculating the local housing need assessment is seen as a minimum requirement, consistent with how this is expressed in paras 11, 35(a) and 60 of the NPPF.</p> <p>Government advice to use 2014 population data was to allow more homes to be built. It would be counterintuitive in this context for this Local Plan Review to be based on the lower housing requirement. Review should be based on the higher of the figures in the consultation document as a starting point. This should be seen in the context of Paragraph 11 of the NPPF which requires that a Local Plan’s strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas</p> <p>Agree that presently, with uncertainty around Leicester’s unmet need, there is not sufficient information to determine how much additional housing North West Leicestershire should provide to meet this unmet need.</p>
<p>Respondent 45 <b>Hallam Land Management (Kegworth)</b></p>	<p>The Response Form does not seek specific views on how issues relating to the proposed High Speed 2 (‘HS2’) railway should be considered within the review of the Local Plan. It is important that in preparing any changes to the framework of local planning policy as presented by the Local Plan, the Council is clear as to how it will approach any HS2-related matters arising.</p>

	<p>The HS2 safeguarded route impacts significant parcels of land across the district including a number of previously identified development opportunities. It is prudent that the Council proceed on the basis that ‘replacement capacity’ will be required, in accordance with a revised spatial strategy that takes account of the impact of HS2 on the suitability and availability of development sites. Until such time as HS2 is confirmed however, i.e. it secures Parliamentary approval through legislation and construction works commence, it would also be prudent and entirely logical that the Council maintain recognition within any Local Plan of those sites that could be developed, should HS2 not proceed. The retention of previously identified allocations, now deemed undeliverable solely on the basis of HS2’s proposals, as ‘reserved sites’, or some comparable mechanism, would allow the Local Plan to bring forward those sites without delay, in response to changed circumstances. Request that the above allocations, in particular, site H1k (Ashby Road, Kegworth), being under the control of HLML, be retained within the emerging Local Plan, albeit caveated or reserved as may be necessary in response to the HS2 safeguarded route.</p>
<p>Respondent 48 <b>TNT UK</b></p>	<p>These representations have specific regard to land off Melbourne Road, Lount, Leicestershire which is adjacent to the existing TNT Lount Depot.</p>
<p>Respondent 49 <b>Quarry Plant and Industry (QPI)</b></p>	<p>These representations have specific regard to QPI’s Heather brickworks site.</p>
<p>Respondent 50 <b>Mr and Mrs Mansfield</b></p>	<p>Representations relate to promoted sites at:</p> <ul style="list-style-type: none"> <li>• Land at Butt Lane, Blackfordby</li> <li>• Land south of the A511 Ashby Road and west of Heath Lane, Boundary</li> <li>• Land at north of Leicester Road and west of Corkscrew Lane, new Packington</li> </ul>
<p>Respondent 52 <b>DJ and SC Smith</b></p>	<p>Representations relate to land at Home Farm, Castle Donington, which the owners are seeking to promote through the Review.</p>
<p>Respondent 53 <b>Redrow Homes</b></p>	<p>These representations on the Local Plan Review are made on behalf of Redrow Homes in relation to their interest in land at Church Lane, Ravenstone.</p> <p>Concerned that the Emerging Options consultation does not tackle the crucial issues for the new local plan – namely the preferred scale and location of future development. Lack of progress on Leicester’s unmet need and publication of Memorandum of Understanding is concern to development industry.</p>
<p>Respondent 56 <b>Davidsons Developments (Ibstock)</b></p>	<p>Responses are related specifically to the promotion of land north of Leicester Road, Ibstock.</p> <p>It is unclear why the specific issues have been included in the consultation without consideration of matters such as the housing requirement and options for the development strategy, which will be fundamental to the development of the Local</p>

	<p>Plan. In particular, we would encourage the Council to work with Leicester City Council and other stakeholders to develop an evidence base in relation to the city's unmet housing need which will be a key consideration in developing the Local Plan.</p> <p>It is expected that there will be a full review of strategic issues, including housing numbers and the development strategy to assess whether Local Plan policies remain up-to-date. This review should consider the criteria set out in the Planning Practice Guidance. Would therefore expect these matters, particularly housing requirement, to be subject to further consultation in due course to ensure interested parties have a chance to express their views.</p>
<p>Respondent 57 <b>Hallam Land Management (Appleby Magna)</b></p>	<p>These representations on the Local Plan Review – Emerging Options Consultation are made on behalf of Hallam Land Management in relation to their land interests on land to the north east of Appleby Magna.</p>
<p>Respondent 59 <b>Leicestershire Fire and Rescue Service</b></p>	<p>Whilst Leicestershire Fire &amp; Rescue Service believes that the provision of land for housing and employment is largely a matter for the local authority and its residents, do have a remit to ensure that the new communities and businesses which arise as a result, are as safe as possible.</p> <p>Believe that Planning has an important role to play in designing safer communities both in limiting the harmful effects of fires should they occur and preventing fires from occurring in the first place. The suitability for new development locations should therefore also consider the following, where appropriate:</p> <ul style="list-style-type: none"> <li>Road layouts designed to enable a swift response</li> <li>Access for fire engines</li> <li>Access to water supplies for firefighting</li> <li>Buildings designed to limit fire spread and allow safe exit at all times</li> </ul> <p>In addition, would urge the consideration of fitting sprinklers in new domestic and commercial properties.</p> <p>Increasingly, our experience of keeping people safe and free from injury tells us that it is also about building healthier communities. This means the provision of social and recreational opportunities as well as local support services such as health and social care and education and employment. As such, are pleased and supportive of the proposals on embedding health and wellbeing into new developments.</p>

Question 1 - Should the plan build in a flexibility allowance?	
Respondent 3 <b>Packington Nook Residents Association</b>	<p>Unsatisfactory to ask consultees to agree on a figure when requirements are unknown. Allowance target of 5% maximum until actual requirements become clear.</p> <p>If flexibility allowance is increased as a result of Leicester City having an unmet need, a full sustainability analysis is needed before it is assumed this can be achieved in NWL. Leicester requirement must assume that capacity is for workers in Leicester and consequences of locating them some distance from the city.</p>
Respondent 7 <b>Home Builders Federation</b>	The LPR should build in a flexibility allowance to respond to changing circumstances, to treat the housing requirement as a minimum rather than a maximum figure and to provide choice as well as competition in the land market.
Respondent 9 <b>Ashby Town Council</b>	Yes flexibility should be built in to the plan.
Respondent 12 <b>Willesley Environment Protection Association</b>	Yes.
Respondent 14 <b>Money Hill Consortium</b>	In accordance with Paragraph 33 of the NPPF reviews to the Local Plan should be triggered by changing circumstances affecting an area or any relevant changes in national policy. For this reason, the adopted Local Plan must retain flexibility and highlight that reviews can be triggered by changing circumstances or every 5 years, whichever is sooner. The plan should be flexible in treating the housing requirement as a minimum, not a maximum figure in order to support the Government's objective of significantly boosting the supply of homes.
Respondent 15 <b>Measham Parish Council</b>	Yes.
Respondent 17 <b>Environment Agency</b>	Yes.
Respondent 18 <b>David Bigby</b>	The Council has made it clear in the consultation document that it must include flexibility in order to avoid the plan being found unsound. However, this flexibility should be the minimum necessary to achieve a sound plan as any further allocations are likely to result in further land banking by developers and developers choosing the sites which are most profitable to them rather than those that are most advantageous to the community.
Respondent 19 <b>Ruth Mulvany</b>	Yes the plan should build in flexibility to account for the Leicester city unmet housing need which the district council is committed to in the memorandum and also to factor in the massive growth of 10,000 jobs already identified in the north of the district at the International gateway where it is prudent to have housing needs catered for rather than people commute into the district adding to problems on the M1 and A42.
Respondent 21 <b>Severn Trent Water</b>	Understand that to ensure housing and employment development needs can be met, there may be a need to allocate additional sites as some will inevitably become unviable or un-deliverable within the plan period. If the plan does not

	<p>contain an element of flexibility there is a risk that the plan will be found un-sound by the planning inspectorate, or that ability to resist speculative development will be reduced. Agree that a flexibility allowance within the plan is likely to provide additional benefits in resilience to growth.</p>
<p>Respondent 22 <b>Mr R Gray</b></p>	<p>The plan should build in a flexibility allowance to ensure a minimum 5 year supply of housing land is maintained. The plan needs to have sufficient flexibility to allow a wide variety of sites, in terms of size and location, to come forward through the housing land supply and enable homes to be delivered in every year of the plan period. Flexibility in the form of a buffer or as reserve sites provides resilience and choice.</p>
<p>Respondent 23 <b>Harworth Group &amp;</b> Respondent 27 <b>Hallam Land Management</b> <b>(Packington Nook) &amp;</b> Respondent 57 <b>Hallam Land Management</b> <b>(Appleby Magna)</b></p>	<p>Before considering whether a flexibility allowance is required, the Council needs to be clear on what the housing requirement for the District is. Whilst the Government's proposed approach in the short term is to look back to the 2014-based data to provide the baseline for assessing local housing need, it is considered that using the lower 2014-based projections would underrepresent the actual long-term housing need in the North West Leicestershire housing area.</p> <p>It should be noted that the housing requirements detailed in the Standard Methodology are a starting point, and local planning authorities will need to consider local circumstances including aspirations for economic growth, when establishing their housing requirement for local plans - significant in NWL due to high employment development and unmet housing need from Leicester.</p> <p>Important that the amount of Leicester's housing need to be accommodated in North West Leicestershire be defined and agreed and added to North West Leicestershire's housing need as part of the new Local Plan.</p> <p>Should new plan proceed on 2014-based data, housing requirement should be increased to take account of employment growth and Leicester's unmet need before flexibility allowance is also provided for.</p> <p>With regards to a flexibility allowance, it is important that the Local Plan builds in sufficient flexibility to deal with changing circumstances and to provide certainty that the Local Plan will deliver at least the identified housing requirement over the plan period.</p>
<p>Respondent 24 <b>Gladman Developments</b></p>	<p>The provision of flexibility within the supply will ensure that the plan is more able to adapt to change and serves to enhance the deliverability of the housing requirement. It will also allow a planned response should allocated sites not come forward as expected or should existing planning consents lapse.</p>
<p>Respondent 28 <b>Cadwallader Family</b></p>	<p>Fully support the Council's recognition of the Plan's need to build in a flexibility allowance for housing delivery.</p> <p>Most appropriate strategy would be for the Plan to include a buffer as part of the housing requirement.</p>

<p>Respondent 32 <b>Packington Parish Council</b></p>	<p>It may be prudent to build in a flexibility allowance, with the Government changing the national requirements and following the latest report on social housing requirements pressure could be forthcoming. We believe that any development must meet the Council's policy on sustainability. In relation to Leicester City not being able to provide adequate sites within their area hope that all Leicestershire Authorities when looking at possibly increasing the allocations to take up the slack in Leicester City would ask the question how is that sustainable.</p>
<p>Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson &amp;</b> Respondent 36 <b>Mr and Mrs B Sutton</b></p>	<p>Plan should incorporate a sufficient flexibility allowance in the interests of positive plan preparation. Only allocating enough sites to meet need will mean all sites need to come forward. Flexibility helps to maintain 5 year housing supply.</p> <p>Flexibility should be factored into the housing supply across the plan period to ensure the new Housing Delivery Test requirement can be realistically achieved.</p>
<p>Respondent 39 <b>David Wilson Homes (East Midlands) &amp;</b> Respondent 56 <b>Davidsons Developments (Ibstock)</b></p>	<p>Local Plan risks being ineffective if it does not build in a flexibility allowance.</p> <p>Consider flexibility to be different to the 'buffer' required by the National Planning Policy Framework (paragraph 73) which is specifically related to ensuring a deliverable five-year land supply can be maintained.</p> <p>Contingency allowance of say 20% would allow the minimum identified housing need to be delivered over the plan period should anticipated delivery slip on planned sites for whatever reason. It would also allow for upward changes in the level of unmet need from Leicester City that will inevitably need to be accommodated in the District. This contingency is not the same as the minimum 5% buffer required by paragraph 73 of the NPPF which is specifically to allow for choice and competition in the market within the five-year monitoring period.</p>
<p>Respondent 42 <b>Parker Strategic Land</b></p>	<p>On the basis of the Council's estimate of housing supply, the minimum residual requirement for which additional land should be found is for 1,300 new homes. However, agree that the Local Plan Review should in fact identify additional land in excess of the residual requirement in order to provide surety that the housing requirement can be met in the plan period.</p>
<p>Respondent 43 <b>JVH Town Planning</b></p>	<p>Yes the plan should build in a flexibility buffer to ensure that sufficient sites are identified to meet the housing needs for the District. As set out within the consultation it is unrealistic to expect all sites to firstly come forward and secondly to deliver within the plan period. Given the uncertainty within Leicester in respect to the city being able to accommodate its own need and the Government's consultation target of providing 300,000 homes a year it is apparent that the District is likely to require more housing than currently identified. Although this final figure is yet to be defined it would be sensible to identifying more housing land now rather than trying to play catch up later, or be faced but a situation where the Authority</p>

	were unable to demonstrate sufficient land to meet their needs. Furthermore the time to consider the overall capacity of settlements is at the outset of the plan when proper planning decisions can be made about distribution and individual locations.
Respondent 44 <b>Hanson UK</b>	Yes.
Respondent 46 <b>Ashby Civic Society</b>	Yes.
Respondent 47 <b>Whitwick Parish Council</b>	Yes but only with strong protection with structured caveats.
Respondent 50 <b>Mr and Mrs Mansfield</b>	<p>Given the absence of a definitive housing target, consider that it would be prudent for the Review to include flexibility over the plan period to provide allowances should the deliverability of housing fall below targets.</p> <p>The absence of flexibility to cater for any additional growth would increase the risk of the Plan being found ‘unsound’ at Examination and, in practical terms, could leave the District under-supplied in terms of land for housing. As set out in the tests of soundness for examining plans within the NPPF, the Local Plan Review should only be found effective if cross boundary strategic matters have been dealt with and not deferred (paragraph 35c). The responsibility of NWLDC to co-operate with surrounding authorities to ensure that housing targets can be realistically addressed and delivered over the Local Plan Review plan period should be recognised.</p>
Respondent 52 <b>DJ and SC Smith</b>	Strongly supports the notion to build a flexibility. Agree that if a degree of flexibility is not built into the review it would risk being found ‘unsound’ by the Inspector at the Examination in Public. Failure to build a degree of flexibility would contravene the tests of soundness as set out in the NPPF (2018), and would not be considered positively prepared, or consistent with national policy.
Respondent 54 <b>William Davis Homes and Jelson</b>	<p>As the Council has correctly noted in its consultation document, if there is no flexibility built into the Plan, then delivery of housing to meet the Council’s need would be dependent on every allocation and existing ‘commitment’ delivering the expected number of dwellings and within the timescales anticipated by the Council.</p> <p>Therefore, the Plan needs to be resilient and be able to respond to the ‘rapid’ change in circumstance that would arise where, for example, a landowner or promoter encounters difficulties with delivering an allocated site. Consequently, in order to satisfy the presumption, and in order to ensure that the Plan provides a supply of specific deliverable housing sites over the course of the plan period, it is necessary for the Plan to have flexibility built in to it.</p>

	The question of unmet need arising in Leicester City remains unanswered. The Council should be giving consideration now as to the how the Plan will deal with unmet from Leicester, if required, and how it will contain the flexibility to deliver a share of that need.
Respondent 55 <b>Rosconn Group</b>	Yes, the Local Plan should build in a flexibility allowance as this would be consistent with the NPPF 2018 paragraph 11. This was the approach supported by the Inspector who dealt with the current adopted Local Plan – when considering the higher housing requirement proposed within the Draft Plan set against the lower figure identified within the HEDNA, he advised at paragraph 172 of his report in that adopting the lower figure in the Plan would, inter alia, lack the flexibility to maintain housing supply at the required rate in the face of any significant, unforeseen delay on the delivery of individual sites. Such an approach would also be consistent with the Government’s on-going objective of significantly boosting the supply of homes, carried over from the NPPF 2012 at paragraph 59 of the NPPF 2018.
Respondent 58 <b>Taylor Wimpey</b>	Yes. A flexibility allowance is supported to avoid an over reliance on the exact dwelling numbers assigned being built within the plan period.
Respondent 60 <b>Mather Jamie</b>	Yes, the plan should build in a flexibility allowance in response to the unmet housing needs of Leicester City and the Government’s drive to significantly boost the supply of homes in the country.  Although the calculated housing requirement for NWLDC is presently unclear in the long-term, it is evident that the plan should support the Government’s drive to significantly boost the supply of homes.  There is a significant under-supply of homes in Leicester City which will need to be shared out amongst the other Leicestershire HMA authorities.
Respondent 61 <b>Lesley Birtwistle</b>	Yes.

Question 2 - If we build in flexibility should the plan include a ‘buffer’ to the housing requirement figure when deciding how much land to allocate for new housing or should we identify reserve sites?	
Respondent 3 <b>Packington Nook Residents Association</b>	Do not support reserve sites – they create uncertainty in communities and result in planning blight. Also encourages developers to press for release of land in commercially advantageous areas.
Respondent 7 <b>Home Builders Federation</b>	Any built-in flexibility should include both a buffer to the housing requirement and reserve sites.
Respondent 9 <b>Ashby Town Council</b>	A buffer is not supported.



Respondent 12 <b>Willesley Environment Protection Association</b>	The identification of reserve sites would seem to be preferable to a buffer amount (surplus amount). However, there is a concern with identification of reserve sites that developers would seek for the release of those reserve sites which are most attractive to them in certain locations in terms of housing sales and profit margins, such as Ashby. Therefore, if the use of reserve sites is chosen rather than a simple buffer amount, there should be a way of ensuring that the use of reserve sites can only be used to replace another site within the same settlement location. The replaced site should then be removed from the allocated sites within the same settlement location.
Respondent 14 <b>Money Hill Consortium</b>	<p>In the event that NWLDC needs to allocate additional housing beyond the current Local Plan the Local Planning Authority has several options. This includes the identification of further sites which could form the basis of reserved or safeguarded sites, or that residential densities are increased on existing allocated sites to facilitate the delivery of a larger number of homes.</p> <p>Believe that the provision of a buffer is an appropriate mechanism for maintaining flexibility within the Local Plan. The extent of this buffer should be informed by Paragraph 73 of the NPPF. Significantly, it should be expressed as a percentage rather than an absolute number and suggest that there should be as large a contingency as possible but around 20% would be considered acceptable.</p>
Respondent 15 <b>Measham Parish Council</b>	Reserve sites
Respondent 17 <b>Environment Agency</b>	A buffer.
Respondent 18 <b>David Bigby</b>	No. Would prefer reserve sites, for the reasons explained above. The allocated sites should be well chosen such that unforeseen impediments to development are avoided if at all possible, thus avoiding the need for a buffer. This filtering process needs to start during the SHELAA process. In the past, too many unsuitable sites have been allowed to pass through this filter as “suitable” and “potentially suitable” when it is evident that they are not suitable and would fall foul of current policies.
Respondent 19 <b>Ruth Mulvany</b>	A minimum 10 % buffer with the identified growth it would be better to prepare for this. It also allows smaller sites to come forward as most of the sites allocated in the district are major sites with a massive loss of greenfield habitats rather than smaller sites that the government has identified as necessary to preserve the countryside and ensure rural economies and villages thrive.
Respondent 21 <b>Severn Trent Water</b>	Feel that the allocation of reserve sites would be the preferred method. This is because the plan will still contain the same certainty around the core development proposals allowing development of infrastructure plans and proposals to progress for the main allocations without any additional risk of abortive costs. Whilst it is important that the developers for all development proposals communicate with infrastructure providers through the development process, this will be

	<p>particularly important for reserve sites where active infrastructure planning may be delayed until such time as greater certainty about development is provided.</p>
<p>Respondent 22 <b>Mr R Gray</b></p>	<p>It is submitted that the “buffer” approach to ensuring an adequate housing land supply is more straightforward and less administratively complex. It provides a wider degree of choice and certainty compared to the more complicated and slower process of releasing particular reserve sites at intervals during the plan period.</p> <p>Ultimately it is important that the plan provides for an appropriate number of dwellings above and beyond the final housing required for the District, and potentially any additional homes necessary to accommodate Leicester City’s needs. It is submitted that housing numbers should be increased by 20% of the total housing requirement regardless of whether these additional numbers are allocated via a “buffer” approach or identified as “reserve” sites.</p> <p>It is important that small and medium sized sites are identified in the Plan to come forward for development, particularly as these can deliver homes more quickly than large sites or urban extensions. In particular, Land at Talbot Place, Donisthorpe should be allocated for residential development. The site comprises some 2.95 hectares and could accommodate some 75 dwellings, 20% National Forest Planting, Public Open Space and satisfy the Local Plan Policy for Affordable Housing. It abuts the limits to development and is located in a highly sustainable location.</p>
<p>Respondent 23 <b>Harworth Group &amp; Respondent 27 Hallam Land Management (Packington Nook)</b></p>	<p>Consultation recognises that there are significant lead in times for the delivery of large scale developments, and therefore considers an approach for sites to be allocated which are intended for development in the latter stages of the plan period and beyond. This approach is supported. As the Local Plan Review requirement only covers an additional 5 years above the current plan period, the residual housing requirement may not be a significant amount. As a result, housing to meet a relatively small additional requirement is likely to only require a few small sites – this is unlikely to secure the most sustainable strategy for meeting future housing needs.</p> <p>The SGP looked strategically at the wider area and considers that additional housing need will be largely met by strategic sites, with the ability to plan strategically for housing and associated infrastructure. Having regard to the SGP will inevitably require the identification of housing sites that go beyond the currently proposed plan period of 2036 - Council should therefore look to allocate longer term strategic sites that will run beyond the plan period. As a result, identifying a contingency allowance is difficult to quantify.</p>
<p>Respondent 28 <b>Cadwallader Family</b></p>	<p>The Council’s latest housing land supply statement, published in April 2018, identified a housing land supply of 8.2 years. As such, it is considered that the Council can currently demonstrate a healthy 5YHLS position. The purpose of the buffer is to ensure that the Council can maintain a 5YHLS upon adoption of the Local Plan Review, and therefore, in line with Paragraph 73 of the NPPF, it is our view that a 10% buffer would be the most appropriate figure. Nonetheless, it is crucial that the Council identifies a range of housing allocation site sizes as part of the Local Plan Review.</p>

Respondent 32 <b>Packington Parish Council</b>	We would suggest the plan include a buffer to the housing figure or it could be imposed on the local authority at a higher figure, identifying reserve sites can and will give hope value so we think that is not the way to go.
Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson &amp;</b> Respondent 36 <b>Mr and Mrs B Sutton</b>	Both a 'buffer' to the housing requirement figure and identified reserve sites should be included in the Plan - they perform differing roles and as such are not mutually exclusive. A buffer should be included to ensure a robust housing land supply and to provide choice and competition in the market. Reserve sites however are interventions wherein there has been a failure to deliver despite the buffer and can respond to a number of circumstances depending on the mechanics of any adopted policy. Melton Borough Council have used this approach in its Local Plan which was adopted in October 2018. NPPF also requires flexibility.  Reserve sites can also be used as 'substitutions' should any allocations be shown to be undeliverable during the plan period.
Respondent 39 <b>David Wilson Homes (East Midlands) &amp;</b> Respondent 56 <b>Davidsons Developments (Ibstock)</b>	The preference should be for a contingency allowance to be added to the supply of land rather than rely on reserve sites. Whilst there may be a case for also having reserve sites alongside a contingency allowance to rely solely on reserve sites would not be effective.  The release of reserve sites requires a trigger, the basis of which can sometimes be unclear. There is an inevitable delay in releasing reserve sites after a trigger event, which means that they are not an effective solution to resolve a land supply issue.  If reserve sites are to be included in the plan, these should only be included alongside a contingency allowance. They should be incorporated into the plan alongside a policy with clear triggers and requirements that enables their timely release for development.
Respondent 42 <b>Parker Strategic Land</b>	Preference would be for a "buffer" to be included rather than a reserve site strategy, although this will need to be informed by the form of the housing supply strategy that the Local Plan proposes in due course.
Respondent 43 <b>JVH Town Planning</b>	A buffer would be a sensible approach to ensuring that sufficient land was available at the right time and within the right locations to fulfil the housing needs of the District. In addition to the buffer a list of reserve sites would enable the location of the additional housing to be defined giving enhanced flexibility should this be required.
Respondent 44 <b>Hanson UK</b>	There are advantages for either approach and perhaps rather than determining an either/ or scenario it would be beneficial to consider a combined approach.  In light of the continued uncertainty over the scale of housing need relevant to this authority area, it is reasonable to conclude that a 5% buffer alone would be an overly conservative approach. On that basis, a greater buffer or alternative means for flexibility should also be considered.

	<p>There are certain scenarios, where a reserve site might be a preferred mechanism for delivering flexibility. This has previously been recognised by the LPA and the current local plan has identified reserve sites for specific settlements (i.e. Measham). To adopt this approach across the rest of the authority area would therefore be consistent with the current local plan.</p> <p>With specific reference to the principal urban area of Coalville – the current supply is largely reliant upon the timely delivery of a considerable urban extension (H1h) for 3,500 dwellings. There can be long lead in times and delays in the delivery of such housing allocations. In such cases, it would be prudent to allocate additional housing land within the Coalville urban area with at least a 5% buffer whilst in addition to this, also identifying future extensions/phase 2 sites as reserve sites where there is the available land and flexibility to do so.</p> <p>Hanson UK has land north of Meadow Lane, Coalville which is suitable for allocation.</p>
Respondent 46 <b>Ashby Civic Society</b>	Flexibility should be in terms of a buffer built into the requirement and appropriate land allocated. Reserve sites could blight unnecessarily land which may or may not be used.
Respondent 47 <b>Whitwick Parish Council</b>	Yes but on a minimal basis to reflect the needs of Whitwick residents.
Respondent 50 <b>Mr and Mrs Mansfield</b>	Given the pressures on NWLDC to accommodate unmet housing need from outside of the local authority boundary, the Local Plan Review should be particularly responsive to changing circumstances. A ‘buffer’ made up of achievable, available and deliverable housing sites to come forward over the plan period in sustainable locations should be included on top of ‘minimum’ target housing figures for the District.
Respondent 52 <b>DJ and SC Smith</b>	<p>National policy is clear in its guidance that in order to maintain the supply and delivery of housing, an appropriate buffer should be used to ensure flexibility in the supply. NPPG provides details on the need for an appropriate buffer to ensure that there is a realistic prospect of achieving the planned level of housing land supply.</p> <p>Reserve sites are not appropriate due to:</p> <ol style="list-style-type: none"> <li>1. North West Leicestershire is not a Green Belt authority which would require amendments to the Green Belt boundary and the release of land to meet its housing requirement; and,</li> <li>2. The Council claims a 5 year housing land supply position as of the 1st April 2018. It sets out that it is able to demonstrate in excess of a 5 year housing land supply with either a 5% or 10% buffer, together with its unmet need of 670 dwellings.</li> </ol> <p>National guidance fails to provide advice as to how the identification of ‘reserve sites’ incorporates a flexibility allowance into the housing land supply. In the absence of any appropriate guidance, it would be prudent of the Council to consider the</p>

	<p>adoption of a buffer to ensure flexibility within the supply. To ensure that an appropriate supply of housing land is maintained against its housing requirement, the Council should engage in annual reviews.</p>
<p>Respondent 54 <b>William Davis Homes and Jelson</b></p>	<p>In order to achieve the flexibility that is required by the NPPF, the Council must be able to demonstrate that the Plan will be resilient against changes in circumstance so as to deliver sufficient housing to meet the identified need for the District.</p> <p>The Council ought first to establish a buffer against its identified need. The Local Plans Expert Group recommended to Government in 2016 that such a buffer should be 20% of the identified need in order to ensure flexibility in a local plan. This remains an appropriate buffer for use in local plans.</p> <p>Having established the buffer, the Council needs to ensure that there are sufficient sites available that are suitable for residential development and capable of meeting the overall target (that is, the identified need plus the buffer) over the plan period.</p> <p>The Council should make sufficient allocations in the Plan to meet the overall target (need plus buffer), and, in addition, identify a further pool of reserve sites. It is exceptionally rare for every allocated site in a Plan to be delivered in the way envisaged by a local authority.</p>
<p>Respondent 55 <b>Rosconn Group</b></p>	<p>Any built-in flexibility should include a buffer to the housing requirement. In addition, it should be noted that the NPPF Paragraph 68 also encourages Council's to allocate small and medium-sized sites as they "can make an important contribution to meeting the housing requirement of an area, and are often build – out relatively quickly and help promote the development of a good mix of sites. Such an approach is particularly pertinent in the District which is particularly reliant on a relatively small number of large commitments and allocations in a limited number of geographical locations"</p>
<p>Respondent 57 <b>Hallam Land Management (Appleby Magna)</b></p>	<p>See Question 1.</p>
<p>Respondent 58 <b>Taylor Wimpey</b></p>	<p>A buffer is supported in line with the NPPF's suggestion of a minimum buffer of 5%-20% depending on the circumstances. The introduction of reserve sites is also supported but clearer guidance on what grounds they can be bought forward is paramount.</p>
<p>Respondent 60 <b>Mather Jamie</b></p>	<p>In consideration of paragraphs 11 and 35 of the NPPF (2018), to help with the soundness of the plan, it should include both a 'buffer' and identify reserve sites.</p> <p>The NWLDC local plan will need to help with accommodating the unmet needs arising from Leicester City and will therefore play a role in delivering homes for the District and wider Leicester &amp; Leicestershire HMA area. The plan will need to be</p>

	<p>sufficiently flexible and deliverable in order to demonstrate soundness to the Secretary of State. The Local Plans Expert Group (LPEG) (March 2016) considers improving the deliverability of local plans and states in paragraph 41(i).</p> <p>A housing 'buffer' beyond the requirement for the District and unmet needs from Leicester City will help the local plan demonstrate the flexibility advised by the LPEG report.</p> <p>In respect of reserve sites, the LPEG report advises that reserve sites are included within local plans – see also paragraph 11.4 of LPEG report. The justification for reserve sites is detailed in paragraph 41(ii) of the report.</p>
<p>Respondent 61 <b>Lesley Birtwistle</b></p>	<p>Buffer.</p>

Question 3 - If we were to include a 'buffer' what would be an appropriate figure?	
<p>Respondent 7 <b>Home Builders Federation</b></p>	<p>There is no numerical formula to determine the appropriate quantum for a flexibility contingency but where the housing land supply (HLS) is highly dependent upon one or relatively few large strategic sites and / or specific settlements / localities then greater numerical flexibility is necessary than if the HLS is more diversified. For the Council to maximize housing delivery the widest possible range of sites by size and market location is required so that small local, medium regional and large national house building companies have access to suitable land in order to offer the widest possible range of products. The HBF always suggests as large a contingency as possible (at least 20%) because as any proposed contingency becomes smaller so any in built flexibility reduces. If during the LPR Examination any of the Council's assumptions on lapse rates, windfall allowances and delivery rates are adjusted or any proposed housing site allocations are found unsound then so any proposed contingency reduces.</p>
<p>Respondent 9 <b>Ashby Town Council</b></p>	<p>A buffer is not supported.</p>
<p>Respondent 12 <b>Willesley Environment Protection Association</b></p>	<p>If it is decided to include a buffer rather than reserve sites then a 5% figure is considered appropriate.</p>
<p>Respondent 14 <b>Money Hill Consortium</b></p>	<p>See Question 2.</p>
<p>Respondent 17 <b>Environment Agency</b></p>	<p>Not qualified to answer.</p>
<p>Respondent 18 <b>David Bigby</b></p>	<p>The minimum to ensure the plan being found sound.</p>

Respondent 19 <b>Ruth Mulvany</b>	20%
Respondent 22 <b>Mr R Gray</b>	It is submitted that a buffer of 5% or 10% will not be sufficient to provide flexibility in the housing land supply.  A buffer of 20% is more likely to achieve the required flexibility and ensure that the Local Authority's proposed housing growth will be achieved.
Respondent 23 <b>Harworth Group</b>	See Question 2.
Respondent 24 <b>Gladman Developments</b>	Consider that the Council should allocate 10-20% of sites in addition to the overall housing requirement.
Respondent 30 <b>Intro Crowd &amp;</b> Respondent 37 <b>Western Range &amp;</b> Respondent 40 <b>Davidsons Developments &amp;</b> Respondent 53 <b>Redrow Homes</b>	It is important that the local plan builds in sufficient flexibility to deal with changing circumstances. A contingency allowance of around 20% is considered appropriate to provide for necessary flexibility in the plan. Providing a contingency is an approach that has been adopted by other Leicestershire authorities when bringing forward their new local plans – Harborough Local Plan makes provision for a 15% contingency to allow for possible future circumstances affecting delivery of housing. This approach is considered the most appropriate, and is preferable to the identification of clear triggers for the release of any reserve sites.
Respondent 32 <b>Packington Parish Council</b>	We think the lower of the figures quoted 5%.
Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson &amp;</b> Respondent 36 <b>Mr and Mrs B Sutton</b>	Local Plans should make an allowance equivalent to 20% of their housing requirement. The Housing Delivery Test requires provision of a 20% land buffer, should delivery fall below 85%, to ensure the ongoing availability of a realistic supply of deliverable sites as well as a reservoir of potential development sites to address shortfalls in housing delivery. This level of buffer will provide the market with choice and competition and ensure flexibility. It further provides certainty that the housing requirement will be met and that the District will not experience issues with housing land supply as has been the case in the recent past.  At the very minimum a 10% buffer should be utilised, to set the annual position to ensure certainty for the first year following the adoption of the Plan Review, not allowing for opportunity for it to be undermined immediately.
Respondent 39 <b>David Wilson Homes (East Midlands) &amp;</b>	Consultation refers to the three possible buffers (5/10/20%) set out in paragraph 73 of the NPPF (2018). These buffers are related to the supply of deliverable housing sites over a five-year period – they are not contingency allowances/buffers for the purpose ensuring delivery of housing over the plan period.

Respondent 56 <b>Davidsons Developments (Ibstock)</b>	<p>Consider a 20% contingency allowance would be appropriate to ensure the plan is effective.</p> <p>The buffer in relation to five-year land supply will need to be established through the Housing Delivery test as set out in paragraph 73 of the NPPF.</p>
Respondent 42 <b>Parker Strategic Land</b>	The adopted Local Plan includes a flexibility allowance of 10% (explained at para 156 of the Inspector's Report, amongst other places). However, in the context of the greater significance afforded to improving housing supply, consider the buffer should be 20%.
Respondent 43 <b>JVH Town Planning</b>	20% Buffer with reserve sites identified. This is justified by the approach in the NPPF to boost the housing supply and deliver affordable homes.
Respondent 46 <b>Ashby Civic Society</b>	10%.
Respondent 47 <b>Whitwick Parish Council</b>	Less than 2%.
Respondent 50 <b>Mr and Mrs Mansfield</b>	<p>Given the circumstances surrounding housing delivery in Leicestershire, NWLDC is likely to find itself under significant pressure to meet housing targets beyond those typically delivered across the District.</p> <p>Given that NWLDC have already acknowledged the challenges anticipated at the Emerging Options stage, it would be prudent to employ a 20% buffer (in line with NPPF) to ensure that the District is in the best possible position to meet a five year supply of housing land throughout the Local Plan Review plan period.</p> <p>Even a 20% buffer could still be eroded if during examination any of the Council's assumptions on lapse rates, windfall allowances and delivery rates become adjusted, or any proposed housing site allocations are found unsound. The larger the 'buffer' on top of housing targets, the greater flexibility the Council has in ensuring that housing targets can still be met over the plan period. Consider that a buffer of 20% should be seen as a minimum.</p>
Respondent 52 <b>DJ and SC Smith</b>	<p>NPPF sets out appropriate buffers (5%, 10%, 20%). Based on past completions, it is not necessary for the Council to adopt a 20% buffer at this time – but position should be monitored throughout preparation of plan. Should completions fall significantly, a 20% buffer should be adopted.</p> <p>Considered that the Council's adopted housing requirement of 481 dpa is too conservative. Important that the Council aligns its housing requirement with its economic growth strategy to ensure a sufficient supply of homes is delivered to support the working population, and vice versa.</p>
Respondent 54	With reference to the recommendations of the Local Plans Expert Group, a buffer of 20% should be applied.



<b>William Davis Homes and Jelson</b>	
Respondent 55 <b>Rosconn Group</b>	The Council's Housing Supply is dependent on a few large allocations in a limited number of locations (Coalville Urban Area, Ashby de la Zouch and Castle Donington). Therefore, greater flexibility is required so that the HLS is more diversified. Suggest a buffer of between 10% and 20% because as any proposed contingency becomes smaller so any inbuilt flexibility reduces.
Respondent 57 <b>Hallam Land Management (Appleby Magna)</b>	See Question 1.
Respondent 58 <b>Taylor Wimpey</b>	A buffer of 5% is proposed in line with 73(a) of the NPPF 2018 as this ensures choice and competition in the market for land.
Respondent 60 <b>Mather Jamie</b>	<p>Paragraph 73 of the NPPF (2018) details that local planning authorities should have a 5-years supply of housing plus an appropriate buffer – either 5%, 10% or 20%.</p> <p>As a comparison, the following examples of buffers within other local plans are provided:</p> <ul style="list-style-type: none"> <li>• The Gedling Borough Council Local Plan Part 2, adopted July 2018, includes a 11.7% buffer on top of the OAN housing requirement.</li> <li>• Stratford-on-Avon District Council Core Strategy, adopted July 2016, includes a 12.5% buffer on top of the OAN housing requirement.</li> </ul> <p>In view of the above and the need to offer sufficient flexibility within the plan to deliver the requirement for NWLDC and unmet needs arising from Leicester City, it is recommended that a minimum 10% housing buffer is applied to the local plan.</p>
Respondent 61 <b>Lesley Birtwistle</b>	5%.

<b>Question 4 - If we were to identify reserve sites under what circumstances should sites be released?</b>	
Respondent 3 <b>Packington Nook Residents Association</b>	<p>Do not support allocation of reserve sites.</p> <p>Would have to be a competent needs assessment after demonstrating that all approved sites in a locality, which already have planning permission, are progressing in a timely way. Reserve sites would never be acceptable if land elsewhere, already possessing planning permission, was slow to develop, or being "banked" by landowners.</p>

Respondent 7 <b>Home Builders Federation</b>	The release of reserve sites should be triggered by under performance against planned housing delivery set out in the housing trajectory and 5 YHLS.
Respondent 9 <b>Ashby Town Council</b>	The Town Council supports the use of reserve sites and these should only be brought forward when an existing site is identified as no longer suitable. If a reserve site is released then the exiting site it replaces should be removed from the list of allocated sites.
Respondent 12 <b>Willesley Environment Protection Association</b>	The response to question 2 applies. Also, there should be a requirement that all approved sites at a settlement location and given planning permission are progressing at an agreed rate of build.
Respondent 14 <b>Money Hill Consortium</b>	<ul style="list-style-type: none"> <li>▪ Sequential approach, i.e. most sustainable first</li> <li>▪ In the event of persistent under-delivery</li> <li>▪ In the event of relevant changes in national policy</li> </ul>
Respondent 15 <b>Measham Parish Council</b>	If the Government increased its housing targets
Respondent 18 <b>David Bigby</b>	Only when it becomes clear that an allocated site cannot be developed fast enough due to a legitimate physical problem associated with that site and there is a danger of falling below the required build rate. Planning permissions for allocated sites should include stipulated development time-scales and developers need to agree to those time-scales and should be expected to comply. If they cannot comply then they should be obliged to transfer the sites to the local authority, another social housing provider or another developer who can develop within the stipulated time scales. If a reserve site has to be released then the site for which it has been substituted should be removed from the allocation and any planning permission rescinded.
Respondent 19 <b>Ruth Mulvany</b>	If phasing on major developments is slow due to recession etc Brexit etc
Respondent 21 <b>Severn Trent Water</b>	Not able to comment on specific criteria for the release of reserve sites, but would like to be made aware of reserve sites at time of allocation within the plan and again as these sites are released for development. This is essential to ensure required capacity improvements are delivered in appropriate timeframe.
Respondent 22 <b>Mr R Gray</b>	<p>Should the LPA decide to take a reserve site approach to flexibility in order to deliver its housing requirement, then sufficient reserve sites should be identified to ensure that over the plan period there are realistic alternative sites that can be delivered to safeguard the situation where allocated sites are not delivering in accordance with the trajectory of any given year.</p> <p>The process for the release of reserve sites must be straightforward and able to affect a speedy response to a failing five year housing land supply situation.</p>

<p>Respondent 23 <b>Harworth Group &amp; Respondent 27 Hallam Land Management (Packington Nook)</b></p>	<p>As discussed at Question 2 above, rather than identifying reserve sites, longer term strategic sites should be identified through the Local Plan Review and there should be a policy regarding potential triggers for the potential early release of such allocations.</p>
<p>Respondent 24 <b>Gladman Developments</b></p>	<p>In areas of constraint, planning for reserve sites provides for an effective means of future proofing the Local Plan. There are limited constraints to development in NWL, and as such there is more scope for development to come forward over the plan period through alternative means of provision. A housing requirement should only be phased where there are fundamental reasons to do so – such as the requirement for development specific infrastructure. Otherwise, sustainable development should not be prevented from coming forward for development.</p>
<p>Respondent 32 <b>Packington Parish Council</b></p>	<p>If you were to go down the reserve sites then these should only be brought forward in the event of sites not progressing and being built out. Would hope that the government will give Local Authorities more powers to prevent the builders from not progressing sites.</p>
<p>Respondent 33 <b>Richborough Estates &amp; Respondent 34 Robert Botham &amp; Respondent 35 Mr P Atkinson &amp; Respondent 36 Mr and Mrs B Sutton</b></p>	<p>Reserve site policy should allow for multiple methods of release to respond to different circumstances – should be linked to failures to deliver against trajectory and if allocated sites become undeliverable.</p> <p>Should delivery fall below 90% of that expected by the trajectory then reserve sites could be released. Reserve sites should also be released if annual monitoring shows a deficiency in the housing land supply, including a 20% buffer as previously considered appropriate. Reserve sites should be able to be brought forward in the event that an allocated site within the same settlement becomes undeliverable.</p>
<p>Respondent 39 <b>David Wilson Homes (East Midlands) &amp; Respondent 56 Davidsons Developments (Ibstock)</b></p>	<p>Do not believe that reserve sites are the most appropriate mechanism for addressing any shortfall in housing delivery, but they are to be included, the accompanying policies need to be clear and effective to govern their efficient release. It is considered that triggers will need to be based around a shortfall in housing delivery or a clear underperformance against the Council’s housing trajectory.</p> <p>The release of sites needs to be timely to avoid unnecessary delay in rectifying a delivery issue. Whilst it is difficult to comment specifically without a proposed housing trajectory, it is considered that underperformance by more than 10% against the trajectory for 2-3 years may be an appropriate trigger. Such an event would be a clear sustained shortfall in delivery that would require intervention through the release of additional land.</p>
<p>Respondent 43 <b>JVH Town Planning</b></p>	<p>Reserve sites would require to be released when, either the Authority were unable to demonstrate and adequate land supply as per the requirements of the NPPF or if it becomes clear that the supply isn’t delivering in accordance with the plan requirement.</p>

<p>Respondent 44 <b>Hanson UK</b></p>	<ul style="list-style-type: none"> <li>- In accordance with footnote 7 of para 11(d) of the NPPF</li> <li>- Where the anticipated rate of development for specific sites has not been delivered in accordance with the trajectory</li> <li>- Where changes to the methodology for identifying housing need are changed at national policy level and which indicate a greater need for housing than that identified in the local plan.</li> <li>- Automatic release of reserve sites in the last 5 years of the local plan if they have not already been released under the above circumstances</li> </ul>
<p>Respondent 46 <b>Ashby Civic Society</b></p>	<p>Reserved sites should be released when the annual housing trajectory shows a shortfall in the five year land supply.</p>
<p>Respondent 47 <b>Whitwick Parish Council</b></p>	<p>Areas that are able to fulfil the needs of the new residents. Brownfield sites should be fully utilised before other locations are considered. Sequentially preferable sites based on employment opportunities, traffic infrastructure to accommodate the increase in traffic which doesn't adversely affect the character of an area. Other community factors should have capacity to meet needs that an increased population will require for social, medical, police and welfare needs.</p>
<p>Respondent 52 <b>DJ and SC Smith</b></p>	<p>Suggest that an appropriate buffer is adopted as a measure of incorporating flexibility within the Plan rather than relying on the delivery of all sites identified within the Plan. This is on the premise that sites which are identified as available, suitable, achievable and deliverable should not be limited to development towards the latter part of the plan period. Instead they should be brought forward as early as possible to ensure a continued and sustainable release of housing land.</p> <p>Notwithstanding, should the Council choose to identify 'reserve sites' it is strongly recommended that a policy trigger mechanism is incorporated in the review. Any such policy trigger mechanism should clearly set out that if that Council fails to meet the Housing Delivery Test, or any other such threshold, these 'reserve sites' would come forward for development. Indeed, any such policy would need to meet the necessary tests of soundness as set out in the NPPF, and would need to be in accordance with the provisions of the Housing Delivery Test.</p>
<p>Respondent 54 <b>William Davis Homes and Jelson</b></p>	<p>If the Plan identifies reserve sites, then it would need to clearly specify the triggers for those sites coming forward for development. Those triggers would need to be set out in a Policy – and should include:</p> <ul style="list-style-type: none"> <li>• reference to the Housing Delivery Test, so that if delivery rates fall beneath a given percentage, a reserve site can be released for development;</li> <li>• reference to maintaining five-year supply, so that if the Council concludes, through its monitoring, or the publication of an Annual Position Statement, that it cannot demonstrate a five-year supply, a reserve site can be released for development;</li> </ul> <p>and</p>

	<ul style="list-style-type: none"> <li>• reference to circumstances where allocated sites fail to deliver at the rates, or within the timescales, set out in the Council’s housing trajectory, which would need to be remedied by the release of one or more reserve sites; and</li> <li>• a change to the need assessment arises from household projections or resolution of the Leicester unmet need issue.</li> </ul>
Respondent 57 <b>Hallam Land Management (Appleby Magna)</b>	See Question 1.
Respondent 58 <b>Taylor Wimpey</b>	If there is reasonable proof of under delivery within 18 months to 2 years of the 5-year housing land supply period, due to the length of time that sites take to come forward through the planning process.
Respondent 60 <b>Mather Jamie</b>	Reserve sites should be released whenever a shortfall has been identified, either through the Housing Delivery Test or the forecast 5 year housing land supply.  Paragraph 75 of the NPPF (2018) refers to monitoring the progress of housing delivery - accordingly, as part of the action plan, NWLDC would release reserve sites appropriate to addressing the shortfall when the District is delivering 95% of the housing requirements.
Respondent 61 <b>Lesley Birtwistle</b>	Only towards end of period in question if absolutely clear required building on designated sites not going to be achieved.

Question 5 - Should the review build in the potential for sites to be developed which go beyond the end of the plan period?	
Respondent 3 <b>Packington Nook Residents Association</b>	As there is no certain requirement, would oppose this course of action.
Respondent 7 <b>Home Builders Federation</b>	The LPR should build in the potential for large strategic sites to be developed beyond the end of the plan period.
Respondent 12 <b>Willesley Environment Protection Association</b>	No. Only to take account of planning legislation and changes that become necessary during the period leading up to examination of the Local Plan.
Respondent 14 <b>Money Hill Consortium</b>	Yes. (Requires further expansion in particular to support the potential for large strategic sites to be developed beyond the plan period).
Respondent 15 <b>Measham Parish Council</b>	No.
Respondent 18 <b>David Bigby</b>	Not unless the site involved is a major new town or urban extension which would be expected to provide the bulk of any new allocation and would need a long term development plan to ensure its social and economic viability. For other sites,

	<p>allocating land to be developed beyond the end of the plan period would result in developers cherry picking the most profitable sites rather than those which benefit the community the most and potentially delaying development in order to inflate house prices. Ashby's Money Hill is a case in point which has already been allocated way beyond the end of the plan period bringing extended uncertainty to the area.</p>
<p>Respondent 19 <b>Ruth Mulvany</b></p>	<p>Yes plan for future is paramount for growth in district.</p>
<p>Respondent 21 <b>Severn Trent Water</b></p>	<p>Support this approach as it would provide greater clarity about potential development over an extended period. The plan will however need to be clear about which allocations are proposed for development within the plan period and after the plan period. There may also potentially be a need to include a policy to limit development commencing too early where capacity could not be provided within the plan period due to the anticipated timescales.</p>
<p>Respondent 23 <b>Harworth Group &amp;</b> Respondent 27 <b>Hallam Land Management</b> <b>(Packington Nook)</b></p>	<p>Adopted Local Plan runs to 2031. Review looks to 2036 so will overlap with SGP timeframe, which runs to 2050. As SGP has been agreed by all Leicestershire authorities, the review needs to take account of it.</p> <p>Housing requirements to 2031 and 2036 are identified in HEDNA. Post 2036 SGP has estimated notional scale of growth. To meet this growth, SGP proposes more development in strategic locations. LP review should accord with SGP spatial strategy.</p> <p>Local Plan review period may need to be extended to ensure 15 year period from adoption and sufficient time to complete review.</p> <p>Important that the Local Plan Review looks to allocate strategic sites, in order to accord with the Strategic Growth Plan, and as a result, these strategic sites will go beyond the present time scale of 2036. This recognises the often significant lead in time for the delivery of large scale developments, as proposed by the Strategic Growth Plan, such as urban extensions and new settlements.</p>
<p>Respondent 30 <b>Intro Crowd &amp;</b> Respondent 37 <b>Western Range &amp;</b> Respondent 40 <b>Davidsons Developments &amp;</b> Respondent 53 <b>Redrow Homes</b></p>	<p>This would normally relate to large strategic allocations where build rates may impact the delivery of the site to extend beyond the plan period. To ensure that there is sufficient flexibility in the plan, provision should be made for a range different size sites in various locations to ensure the housing requirement can be delivered. The inclusion of a number of smaller/medium sites would help to ensure the delivery of the housing requirement in the plan period.</p>

Respondent 32 <b>Packington Parish Council</b>	Think the plan should be flexible to move forward past the plan date or that could cause issues coming to the end of the plan period.
Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson &amp;</b> Respondent 36 <b>Mr and Mrs B Sutton</b>	Yes. But, where there is a reliance on larger sites, delivery rates should be calculated sensibly using market knowledge of comparable sites. Strategic sites have long lead in times.
Respondent 39 <b>David Wilson Homes (East Midlands) &amp;</b> Respondent 56 <b>Davidsons Developments (Ibstock)</b>	Not essential, as the focus should be on ensuring sites are identified that can be delivered in the plan period, and as plans should be reviewed every five years, well before the end of the plan period. However, it would be helpful for continued growth if land is identified for future, longer term delivery, to avoid any dip in delivery which can occur if plans take a short-term view, particularly in the context of the SGP.
Respondent 43 <b>JVH Town Planning</b>	Yes this is considered acceptable provided delivery targets are being met within the plan period. Phasing plans would be required to identify and to understand where and why this is likely to occur. (presumably this would be on larger sites in excess of several hundred units). Once this is identified this would then enable the buffer and if required reserve sites to be released to ensure delivery was met during the plan period. Any review of the plan should then be able to factor in these figures and adjust the requirements accordingly.
Respondent 46 <b>Ashby Civic Society</b>	It would be acceptable to build in sites which contribute in the planned period and then extend into the next period. However sites should not be allocated that produce only in the next period.
Respondent 47 <b>Whitwick Parish Council</b>	No.
Respondent 52 <b>DJ and SC Smith</b>	The NPPF sets out that strategic policy should look ahead over a minimum of a 15 year period from the date of adoption, to anticipate and respond to long-term requirement and opportunities. Support the notion for the review to build in the potential for sites to be developed which go beyond the plan period. Include range of sites from small to medium sites which serve to meet immediate housing need in the first 5 years of the plan period, to larger strategic sites which serve to meet immediate need and the need identified towards the latter part of the plan period and beyond.

	Allocating a range of sites in the NWLLPR will ensure continuity in the housing land supply and will ensure that the Council is better able to meet its need for entire plan period, drawing on both smaller and larger sites. The Council should seek to maintain a rolling housing land supply which incorporates sufficient flexibility to adapt to change.
Respondent 54 <b>William Davis Homes and Jelson</b>	<p>In principle, it could be acceptable for the Plan to include sites that would continue to be built out beyond the end of the plan period. However, if it does so, then the Council must set out in its trajectory how many dwellings would be provided on those sites in this plan period, and must be able to robustly evidence its assumptions. It must not be a means for the Council to 'back load' its housing supply and over-rely on sites which are not going to begin delivering until towards the end of the plan period.</p> <p>For large sites it would be perfectly reasonable for the Council to include a trajectory that goes beyond the end of the plan period. Large sites that are capable of delivering supporting infrastructure should not be discounted due to their extended delivery period. This does not, however, remove the need for the plan period in full, within the plan period.</p>
Respondent 55 <b>Rosconn Group</b>	The Council should build in flexibility for sites to be developed beyond the plan period considering that the current housing land supply is based on relatively few large commitments / allocations which have been slow to deliver. In assuming more realistic delivery rates on these sites, this may well indicate they will extend beyond the Plan period and compensatory allocations should therefore be made on small and medium sized sites that are able to deliver more quickly, as advised by paragraph 68 of the NPPF.
Respondent 57 <b>Hallam Land Management (Appleby Magna)</b>	Adopted Local Plan runs to 2031. Review looks to 2036 so will overlap with SGP timeframe, which runs to 2050. As SGP has been agreed by all Leicestershire authorities, the review needs to take account of it.
Respondent 58 <b>Taylor Wimpey</b>	Yes, as this will allow wider scale developments to be promoted which will contribute to meeting Leicestershire's Growth Plan 2050.
Respondent 60 <b>Mather Jamie</b>	<p>The plan should allocate a sufficient number of housing sites which will deliver the housing requirement within the plan period with flexibility built in through a 'buffer' and reserve sites.</p> <p>However, some of the strategic urban extensions may only deliver part of their allocation within the plan period. The remainder of their allocation should be considered and calculated within the next local plan review or new local plan preparations.</p>
Respondent 61 <b>Lesley Birtwistle</b>	No.



Question 6 - Are there any other ways that the plan can build in flexibility?	
Respondent 3 <b>Packington Nook Residents Association</b>	Inevitable that to encourage diversity and rural growth, land will have to be identified at settlements other than Coalville, Ashby, Measham and Castle Donnington. The authority should co-operate with other authorities on a regional basis and identify the potential of highly sustainable new towns on greenfield sites.
Respondent 7 <b>Home Builders Federation</b>	Other ways to build in additional flexibility include a permissive policy approach to sustainable development adjacent to as well as within development boundaries, rural exception sites for self / custom build housing and / or LPR sooner than every 5 years under certain specified circumstances.
Respondent 12 <b>Willesley Environment Protection Association</b>	There should be some form of recognition and planning liaison with planning authorities in adjacent cities and counties, i.e. Nottingham, Derby, Derbyshire, Nottinghamshire to take account of the large amount of employment development within NWL, in particular in the northern part of the district which is part of the area to be known as the Leicestershire International Gateway and identified in the Strategic Growth Plan being prepared. Both in terms of sites already identified and others likely to be developed. It is important that it is recognised that significant proportions of employees at sites in this general area will travel from closer locations outside the district and therefore not all need to be accommodated within North West Leicestershire. Co-location of employment and residential developments is a sustainability idea to reduce the need to travel. Much development taking place in Ashby is accommodating many people travelling large distances commuting to Birmingham, Nottingham, Derby, and the Castle Donnington Area, leading to increased dependence on car travel and poor sustainability.
Respondent 14 <b>Money Hill Consortium</b>	<ul style="list-style-type: none"> <li>▪ Allow existing allocations to come-forward in phases</li> <li>▪ Take a flexible approach to housing density</li> <li>▪ Have a lenient policy approach to sustainable development within/adjacent to existing settlements</li> </ul>
Respondent 15 <b>Measham Parish Council</b>	No.
Respondent 18 <b>David Bigby</b>	It should minimise flexibility wherever possible as flexibility inevitably means allocating more land than is necessary.
Respondent 19 <b>Ruth Mulvany</b>	Yes the plan should follow closely the economic growth and allow sites to come forward for housing where large scale employment land is given permission.
Respondent 23 <b>Harworth Group &amp;</b> Respondent 27 <b>Hallam Land Management (Packington Nook)</b>	See Question 5.

Respondent 24 <b>Gladman Developments</b>	Should set an effective policy framework to deal with the determination of windfall schemes which may come forward during the plan period. One example of this has been proposed through the Ashford Local Plan 2030 (as modified) which is currently subject to examination.
Respondent 32 <b>Packington Parish Council</b>	The council could look to identify brown field sites and work with developers to bring these forward.
Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson &amp;</b> Respondent 36 <b>Mr and Mrs B Sutton</b>	Plan should contain policies permissive to development on unallocated sites, subject to meeting a number of criteria.  Council should look to review whether settlement envelopes remain an appropriate planning mechanism, in a world where LPA's are expected to plan positively for sustainable development. In most cases the lines delineating the settlements are almost arbitrary, following residential curtilages and not natural or landscaped features, and at the very least a review of these should be undertaken to explore where appropriate alterations could be made to ensure sustainable growth patterns of settlements, and to ensure that development forced within a settlement, where instead it may be most appropriate for the settlement to grow.
Respondent 39 <b>David Wilson Homes (East Midlands) &amp;</b> Respondent 56 <b>Davidsons Developments (Ibstock)</b>	Flexibility can be provided by ensuring that the range of sites allocated is not overly restrictive. Whilst strategic growth has benefits in terms of limiting the potential objections by a greater number of communities, any delay in delivery of strategic sites can be fatal for a plan.  In terms of diversifying supply and providing flexibility, custom/self-build homes are often mentioned as an additional source of supply. We would agree with this position – but would note that this is only the case where the sites are additional to those allocated for 'standard' residential developments.  To be effective and provide additionality, any self/custom-build housing policy needs to avoid prescribing a percentage of development on major sites that should be custom/self-build plots. The effect of such a policy would be to simply replace the delivery of market/affordable homes with self/custom build – it would not add any additionality and would potentially undermine the planned delivery of market and affordable housing.
Respondent 43 <b>JVH Town Planning</b>	The larger the pool of sites the plan identifies and holds either in reserve or within the buffer will increase flexibility. Furthermore a range of sites within the allocations means that there greater chance of delivery as set out in the NPPF. The housing target should also be viewed as minima rather than maxima number and enough flexibility should be built in to enable smaller settlements to grow to assist them retain and ideally expand local services and facilities growing communities and increasing sustainability for existing residents. Proportional growth in Sustainable Villages is attractive to the market and provides sites which are developed out in a timely manner thereby ensuring housing delivery.
Respondent 44 <b>Hanson UK</b>	As identified at question 2 – a combined approach.

Respondent 46 <b>Ashby Civic Society</b>	There is natural flexibility from windfall sites which contribute to the housing need. By not building windfall into the trajectory this creates further flexibility.
Respondent 47 <b>Whitwick Parish Council</b>	The Plan already meets the needs of the local community and has sufficient element for flexibility.
Respondent 52 <b>DJ and SC Smith</b>	National guidance focuses on the use of an appropriate buffer as a method of incorporating flexibility within the supply. In this regard, it is considered that the use of an appropriate buffer in this case is a suitable approach for ensuring flexibility within the supply.
Respondent 54 <b>William Davis Homes and Jelson</b>	Beyond incorporation of a buffer and reserve sites, the Plan should include provisions / triggers for a rapid review in the event that the local need for the District changes. This might include, for example, revised household projections, or clarification on the Leicester unmet need issue.
Respondent 55 <b>Rosconn Group</b>	All opportunities to provide a deliverable supply of housing that achieves the Government's objectives of boosting significantly the supply of housing should be explored, taking account of the guidance at paragraphs 59, 68 and 73 to 76 of the NPPF. Additional flexibility could also include permitting sustainable development opportunities adjacent to existing limits to development of settlements as they arise and where there may be wider socio-economic benefits that outweigh any harm, or where that harm can be appropriately mitigated. Development adjacent to the limits to development as currently defined would also help support the growth of the rural communities. This view is supported by the NPPF 2018 paragraph 78.
Respondent 57 <b>Hallam Land Management (Appleby Magna)</b>	To ensure there is a good range of size and type of sites for housing. Whilst there may be a focus on strategic sites, there is also a need to provide smaller sites that can be delivered quickly and more able to respond to meeting housing needs and changes in market requirements.
Respondent 61 <b>Lesley Birtwistle</b>	Look at alternative methods of building which would speed up the process so extra land not needed e.g. prefabricated houses.

<b>Question 7 - Is the HEDNA an appropriate evidence base on which to formulate our employment land policies?</b>	
Respondent 3 <b>Packington Nook Residents Association</b>	HEDNA approach to warehouse-type development seriously flawed due to attractiveness of area for this type of development. Need to provide enough for local needs only. Appears to be evidence of oversupply in sector.
Respondent 6 <b>Brackley Property Developments</b>	HEDNA looked at wealth of evidence, including population, household and economic growth projections, to assess the need for housing and employment land over the next 20 years. Preparation included Stakeholder Event to discuss the assessment geography and methodologies, together with discussions with local estate, letting and commercial agents. Findings therefore represent the most comprehensive and up-to-date of housing and employment land needs for Leicestershire. HEDNA also looked at needs at a Local Authority level, and therefore the individual needs for each Leicestershire planning

	area has been assessed and considered. Therefore content that the findings of the HEDNA form an appropriate and robust evidence base for the formulation of employment policies in NWL
Respondent 12 <b>Willesley Environment Protection Association</b>	The comments to question 6 apply. This could mean that the HEDNA based evidence is leading to an excess estimated need.
Respondent 13 <b>Litton (Donington)</b>	<p>Support the findings of the HEDNA (2017) and agree that in accordance with paragraph 31 of the National Planning Policy Framework (NPPF) (2018) the review of the NWLLP and its policies should be underpinned by relevant and up-to-date evidence, taking account of relevant market signals.</p> <p>The HEDNA (2017) represents the latest up-to-date evidence for employment requirements in North West Leicestershire and indicates a residual requirement of 28.2ha of B1a/b (office and research &amp; development) employment uses. HEDNA is an appropriate evidence base to inform the preparation of employment land policies in the Local Plan Review.</p> <p>However the Council should consider through the Review the need to allocate employment land above the requirement identified by the HEDNA, based on the assumption that some 10ha of employment land is to be lost to other uses over the Plan period, which is to be confirmed following completion of the Employment Land Assessment.</p>
Respondent 14 <b>Money Hill Consortium</b>	<p>The HEDNA Report was approved in 2017 and has been used as the basis for supporting emerging Local Plans in the region and, therefore, is considered an appropriate evidence base for certain employment uses. The HEDNA recognises the strength of the logistics and distribution sector in North West Leicestershire albeit it does not conclude on the amount of strategic B8 that is required.</p> <p>The HEDNA references an update report by MDS Transmodal in 2016 which was based on a 2014 evidence-base. In this context, the evidence base for strategic employment land is now approximately 5 years old and at risk of being considered out-of-date. The 2016 update report states that the overall strategic B8 need by 2036 is 1.9 million sq.m. This translates into a requirement of at least 472 hectares of employment land by 2036 and 361 hectares by 2031.</p> <p>Recommend that the HEDNA is supported by research that provides an update assessment of the strategic B8 requirements. This should inform the revision to the Local Plan.</p> <p>Remain committed to the delivery of a 16 hectare strategic employment allocation on land to the north of Ashby-de-la-Zouch (in accordance with adopted Policy Ec2).</p>
Respondent 15 <b>Measham Parish Council</b>	Yes - as this is the only evidence we have to base our answer on.

Respondent 17 <b>Environment Agency</b>	Yes.
Respondent 18 <b>David Bigby</b>	It appears to be the current most appropriate evidence base.
Respondent 29 <b>St Modwen Developments</b>	<p>The new NPPF includes a key section entitled “Building a strong, competitive economy”. It is welcomed that in terms of employment strengths, the Emerging Options consultation recognises that the NW Leicestershire benefits from its central location at the heart of England with good motorway connections and has the added benefit of East Midlands Airport which provides international links.</p> <p>Conclusion that there is no residual need for B1c/B2 or small scale B8 cannot be correct and over-simplifies the need and demands for employment land and how economic investment is realised. Advice from leading commercial agents suggests that the UK Logistics and Industrial Market Sectors remains robust with demand related to online retailing strongly underpinning the market. Lack of high quality stock and shortages of suitable supply are placing considerable constraints on occupiers with upward pressure on rents and pricing due to scarcity of high quality products, prime industrial premises and logistical warehousing, resulting in significant yield compression.</p> <p>The key for the Local Plan Review is to gain a full understanding of actual market focused needs and supply in order to fully grasp the real economic potential. The HEDNA does not fully express or explain such market needs and demands. Nor does the Emerging Options realistic present the real needs and demands for employment floorspace as the net residual calculation over simplifies the range and quality of sites perceived to be committed or available.</p> <p>In reality market needs and demands remain strong particularly within the logistics sector and supply is constrained, raising rents and yields and missing the fully opportunity for growth. The market requires high quality, well located and deliverable sites to meet needs and demands. These needs and demands of the market are considerably greater than set out in the HEDNA and the perceived supply lacks quality, range, size and location required by the market, particularly in the B1c/B2 and small and large logistics sectors.</p>
Respondent 32 <b>Packington Parish Council</b>	Think this could be a blunt tool as it could be over taken with new technologies which may require different assessments as it seems we are very short of office accommodation and smaller units.
Respondent 41 <b>IM Properties</b>	<p>No.</p> <p>The evidence presented in HEDNA on the take up of employment land questionable, for example when compared to Valuation Office Agency data; and its analyses &amp; findings do not benefit from any substantial market facing perspective,</p>

	<p>indeed seem disconnected from recent &amp; current market signals &amp; drivers including those from the renascent &amp; evolving manufacturing sector and evidence of the blurring of the boundaries between B2 and B8 uses.</p> <p>HEDNA is also inward looking and fails to address, for example, the relationships with employment land supply, need and demand in the West Midlands with which Leicestershire and particularly North West Leicestershire have a clear functional relationship. Therefore it over-simplifies and underestimates need albeit that the figures are presented as minimum requirements.</p> <p>Further, HEDNA does not address in any substantial way the need for strategic B8 development and so fails to provide the evidence base required to fulfil the requirements of national planning policy, specifically para 82 of the National Planning Policy Framework, which requires that “Planning policies and decisions should recognise and address the specific locational requirements of different sectors. This includes making provision for ... storage and distribution operations at a variety of scales and in suitably accessible locations.”</p> <p>In the last respect, what information is presented in HEDNA on strategic B8 data is out of date, for example in respect of market penetration of e-tailing, and again inward looking in not acknowledging &amp; addressing the functional relationships with the West Midlands economy and its land needs &amp; supply.</p>
<p>Respondent 43 <b>JVH Town Planning</b></p>	<p>Given this is the latest study without anything else this should be taken as appropriate evidence base.</p>
<p>Respondent 46 <b>Ashby Civic Society</b></p>	<p>HEDNA is the main evidence Base. However the demand needs to be modified by duty to cooperate to ensure total Leicester need is met. Also we need to take into account allocations and permissions which are existing as well as local needs. We also need to consider losses of existing employment land to other purposes.</p>
<p>Respondent 48 <b>TNT UK</b></p>	<p>Whilst the HEDNA represents an adequate technical study to understand the minimum requirement for employment land, this should be used as a baseline position only. Further work will be required by the Council through the Local Plan revision process, which is specific to North West Leicestershire, to fully account for the policy-on context that seeks significant economic growth in the sub-region. This work will also need to pro-actively seek further employment land allocations, not only to address current shortfalls but also provide the quantum of future development required to meet economic aspirations.</p> <p>Given the now relative policy disconnect between housing and employment land pursued in the 2018 National Planning Policy Framework (‘NPPF’), there are no compelling reasons to artificially curtail the market demand for new business growth in the revised Local Plan.</p>

Respondent 49 <b>Quarry Plant and Industry (QPI)</b>	<p>Whilst the HEDNA represents an adequate technical study to understand the minimum requirement for employment land, this should be used as a baseline position only.</p> <p>All efforts should be pursued by the Council to encourage appropriate business development and economic growth. This includes supporting the enhancement of existing business in the District which provide valued local employment opportunities, inward investment and contribute to the established current shortfall in employment land.</p>
Respondent 52 <b>DJ and SC Smith</b>	<p>At Local Plan Examination, there was a general concern that the HEDNA was based on assumptions that were overly optimistic with the future supply of works, and overly pessimistic regarding the future demands of employers in the area. In order for the review to be found sound, it is important that it is based on an up-to-date and robust evidence base. The HEDNA was published two years ago, and could arguably be considered out of date as it relies on data from three years ago. Indeed, the latest evidence from the Office of National Statistics [ONS] employee count data and the self-employment data is that the overall level of jobs located in North West Leicestershire has increased substantially.</p> <p>Has concerns regarding the reliability of the HEDNA, and requests that an updated study is carried out, and is used to underpin the employment land policies contained within the review.</p>
Respondent 58 <b>Taylor Wimpey</b>	HEDNA in addition to accounting for the completed/permission granted Employment developments which are underway is an appropriate evidence base.
Respondent 61 <b>Lesley Birtwistle</b>	Yes.

Question 8 - Which of the options set out above would best address the outstanding need for employment land?	
Respondent 3 <b>Packington Nook Residents Association</b>	<p>i is the only option that would ensure enough office space and could be less unacceptable as a local development than other types of industrial use.</p> <p>The other options are just an opportunity to have excessive development to fulfil the office requirements.</p>
Respondent 6 <b>Brackley Property Developments</b>	<p>Consultation document employment supply figures do not consider potential losses to other uses (currently subject of a separate review). Current plan estimates 10ha loss and so it is reasonable to assume that 11ha shortfall identified in consultation document could further increase. Also unclear where losses in existing employment land may occur.</p> <p>As a result, believe Option iv should be pursued. This would help 'future proof' and ensure long term soundness of local plan, by ensuring an adequate amount of employment land is identified and allocated. Depending on future losses and permissions possibly not taken up, current levels of employment land supply for smaller B8 units may change, with further</p>

	<p>land required. Current ‘over-provision’ of just 5.1 hectares means this could quickly turn in to a deficit. Therefore imperative suitable sites are identified through Local Plan review to maintain a supply throughout plan period.</p> <p>NWL benefits from central location and good motorway networks and EMA. Site being advanced by Brackley at Carnival Way, Castle Donington meets objective to allocate sites which can meet identified shortfall and provide flexibility in type of floorspace offered. Given changing market conditions within sector and significant uncertainties created by Brexit, it is imperative that maximum flexibility is built into emerging planning policies relating to employment land provision.</p>
<p>Respondent 9 <b>Ashby Town Council</b></p>	<p>Option 1 is supported – the allocation to meet just the identified shortfall (100% office use).</p>
<p>Respondent 12 <b>Willesley Environment Protection Association</b></p>	<p>i. The allocation of sufficient sites to meet just the identified shortfall (i.e. for 100% office use).</p>
<p>Respondent 13 <b>Litton (Donington)</b></p>	<p>Options i) and ii) should not be progressed as neither option includes sufficient flexibility to ensure that the total requirement for B1a/b uses along with other employment uses can be delivered up to 2036.</p> <p>With regard to option iv), the opportunity to allocate sites which total more than the identified employment land shortfall is welcomed as this would provide flexibility in meeting the employment land requirements for the District.</p> <p>However, allocating land for employment without any restriction on future employment use is considered ineffective in meeting the identified employment needs as set out by the HEDNA. This approach would provide little certainty. Would option iv) be effective in meeting the objectively assessed needs of the District?</p> <p>An option broadly in line with option iii) represents the best way to address the District’s outstanding need for employment land.</p> <p>The option to allocate sites above the identified employment land shortfall for the District identified by the HEDNA is supported but the allocation of more land than is needed should include allocations that would help ensure the required quantum of B1a/b development is met – this would accord with NPPF Paras 16(b) and 23.</p> <p>The option to allocate more employment sites than the identified employment land shortfall suggests would provide flexibility to ensure that the employment needs of the District are met, including for B1a/b uses, rather than relying on the delivery of all sites allocated for employment uses. This would ensure the objectively assessed needs of the District as set out within the HEDNA (2017) can be met.</p>



	<p>Future allocations should include an additional buffer for B1a/b employment uses, above that of the minimum 28.2ha requirement identified by the HEDNA in order to ensure the total requirement for B1a/b uses in North West Leicestershire is delivered. This would also counter for the potential loss of existing B1a/b employment land to other uses.</p> <p>This approach would also assist in supporting strategic priorities set out in the LLSGP which reflect the findings of the HEDNA (2017) for further employment land. The LLSGP goes on to state that for the Leicestershire International Gateway, where Litton (Donington)'s site is located, there are major employment opportunities which include East Midlands Airport, the East Midlands Gateway (Strategic Rail Freight Terminal) and the proposed HS2 station at Toton.</p> <p>Allocating additional B1a/b employment land across the LIG would support the strategic priorities of the LLSGP and would assist in meeting the objectively assessed needs for employment set out by the HEDNA (2017).</p>
Respondent 14 <b>Money Hill Consortium</b>	The Money Hill allocation is of a scale that supports a strategic employment allocation alongside a new community. In terms of the options identified in the consultation document, recommend Option B, i.e. allocate sufficient sites to meet the shortfall but do not restrict exclusively to B1a/b. This will allow the market to determine the appropriate employment land uses.
Respondent 15 <b>Measham Parish Council</b>	Paragraph iv
Respondent 17 <b>Environment Agency</b>	Option iii
Respondent 18 <b>David Bigby</b>	Option 1 is preferable. As the HEDNA has determined that the District does not require any further B1c/B2 or small B8 premises, then there can be no justification for including further allocations for such sites in the revised plan. It is a disgrace that sites allocated for B1a/b use in the previous and current local plans have regularly been given permission for use in other usage categories such as retail and warehousing. Ashby Business Park is a good example of this failure to properly apply the provisions of the Local Plan which has resulted in the present imbalance. This has also resulted in inappropriate HGV journeys on unsuitable roads, significant congestion, unnecessary air pollution and traffic safety issues. Any further B1a/b allocations need to be strictly enforced and the sites need to be chosen such that they are in desirable locations for employers to build their offices and R&D facilities. It will always be the case that a developer will seek to fill their site as quickly as possible, irrespective of the usage category, and this tendency needs to be strongly resisted through proper enforcement of the Local Plan policies. The plan is not there to help site promoters make profits but to protect the community and to generate sustainable economic development.

<p>Respondent 21 <b>Severn Trent Water</b></p>	<p>Option i. This approach would provide greater certainty on the type and location of employment development, but may result in a number of the allocations not being brought forward or should there not be a local demand for office space the new development may not be utilised.</p> <p>Option ii. This approach presents a greater risk of speculative development, where speculative development occurs Severn Trent will not have been able to plan for any required capacity improvement, therefore there may be delays to development whilst plans are developed and delivered to accommodate the development flows.</p> <p>Option iii. This approach presents a good option, however there is a risk that office space is included within the planning application to obtain planning permission and if demand is not there smaller office space then utilised for a different purpose in line with the main use of the development site. This would result in the supply of office space not being met, if the alternative usage utilises more water, then this could result in insufficient capacity being provided for the overall development.</p> <p>Option iv. This option provides minimal certainty about the type and scale of development as such it would reduce Severn Trent's ability to plan for sewerage growth compared with the other options.</p> <p>Recommendation Option iii would therefore be preferred option as it reduces the risk of speculative development but looks to ensure delivery of the required office space within the plan process</p>
<p>Respondent 32 <b>Packington Parish Council</b></p>	<p>Perhaps a more flexible approach is needed identifying existing land with planning for a different use and bringing that back on the market, Perhaps looking at the Burton to Leicester Railway line and potential sites along its route and reducing the need for road traffic.</p>
<p>Respondent 41 <b>IM Properties</b></p>	<p>Of the options put forward, Option (iv) is preferred as the allocation of more sites than is required to meet HEDNA estimates of need is necessary (i) given that HEDNA estimates are minima: and (ii) to provide the necessary degree of flexibility in supply to respond to changing economic contexts, challenges &amp; opportunities.</p>
<p>Respondent 43 <b>JVH Town Planning</b></p>	<p>Option IV would be the most flexible approach, being too restrictive on employment sites is considered unwise and unlikely to force the market to deliver. It could in fact have a negative impact and see a greater risk of losing potential jobs from the District, which go elsewhere where flexible sites are available. Employment will grow organically within areas if it has the flexibility to deliver market requirements. Planning Policy cannot keep pace and although not at fault is always going to be behind such changes in the market. As needs change and develop quickly and planning has therefore to react to these changes as they cannot be predicted. This has been apparent with High Streets and shopping centre development and within what is classed now considered employment. The classic example being how many people are employed in an automated warehouse compared to a coffee shop. The numbers can be similar yet the land take is hugely different. It is therefore important to ensure flexibility, or sites may effectively be sterilised. This will then exclude start up employment and see investment and jobs go elsewhere.</p>

<p>Respondent 46 <b>Ashby Civic Society</b></p>	<p>All options need to be considered to develop a comprehensive need.</p>
<p>Respondent 48 <b>TNT UK</b></p>	<p>Recognise specific need for B1a/b uses but agreed that specific allocation for these uses is unnecessarily restrictive as a greater level of business flexibility will be required. Also, the lower development and take-up of B1 a/b uses in North West Leicestershire suggest that the economic strengths and market preferences within the District lean towards other business activities. Notably this relates to the logistics, storage and distribution operations. This should not however be considered a weakness.</p> <p>Optimum approach to accounting for the identified minimum need for employment land, particularly in relation to B1a/b uses, is a hybrid of options iii and iv. This is to allocate employment sites that exceed the shortfall (and more than the HEDNA baseline) and provide a supportive, but not stipulative, policy/development management context for B1a/b uses. The impact of this will be to provide greater desired market flexibility, maintain the competitive advantage of the sub-region in other areas, help address the aspirational economic context (therefore policy-on) and bring about more B1 a/b uses working in partnership with developers.</p> <p>It is important to note that B1 a/b uses are often ancillary to, and dependent upon, wider employment generating uses. Whilst supporting B1 a/b uses where ever appropriate may be beneficial, an overly prescriptive percentage or floorspace requirement would likely prove overly restrictive for businesses.</p>
<p>Respondent 49 <b>Quarry Plant and Industry (QPI)</b></p>	<p>Recognise specific need for B1a/b uses but agree that specific allocation for these use types will be unnecessarily restrictive as a greater level of business flexibility will be required. Also, the lower development and take-up of B1 a/b uses in North West Leicestershire suggest that the economic strengths and market preferences within the District lean towards other business activities. Notably this relates to the logistics, storage and distribution operations. This should not however be considered a weakness, but rather as a relative strength. Particularly in light of the wider aspiration to further promote the economic successes of the sub-region.</p> <p>Therefore, the optimum approach to accounting for the identified minimum need for employment land, particularly in relation to B1a/b uses, is a hybrid of options iii and iv. This is to allocate employment sites that exceed the shortfall (and more than the HEDNA baseline) and provide a supportive, but not stipulative, policy/development management context for B1a/b uses. The impact of this will be to provide greater desired market flexibility, maintain the competitive advantage of the sub-region in other areas, help address the aspirational economic context (therefore policy-on) and bring about more B1 a/b uses working in partnership with developers.</p>
<p>Respondent 52 <b>DJ and SC Smith</b></p>	<p>Promoting a mixed use site of up to 9.1ha employment land, envisaged for B1a/b (office). In this context, supports Option 3 as an approach to best address the outstanding need for employment development within the borough. Allocating</p>

	<p>sufficient employment land over and above the requirement will ensure sufficient flexibility in the supply, should sites fail to come forward for development. Indeed, it will also ensure competition in the market place.</p> <p>Support the Council's acknowledgment that there is a shortfall in the employment land supply.</p> <p>Consider it likely that the future demand for employment floor space will derive from office based activities (Use Class B1a/b).</p>
Respondent 58 <b>Taylor Wimpey</b>	Options i., iii. And iv.
Respondent 61 <b>Lesley Birtwistle</b>	(i)

Question 9 - Are there any other options that we could consider?	
Respondent 3 <b>Packington Nook Residents Association</b>	<p>All employment sites need to be put forward with sustainability in mind.</p> <p>Also concerned of the tendency for brownfield ex-employment land to be identified for housing development, pushing new employment land onto greenfield. There is as much justification for brownfield to be re-used as employment land as there is for residential uses.</p>
Respondent 6 <b>Brackley Property Developments</b>	<p>In delivering Option (iv), which will allow all employment land needs to be met and with maximum flexibility to allow for changes in market needs, it may be possible to provide greater prescription with regard to the amount of B1a/b floorspace to be provided within a certain site (either a specific figure or as a percentage of the total floorspace to be provided). Whilst this may not be appropriate for all Sites, in some cases it may assist in securing the appropriate quantum of B1a/b floorspace, whilst still providing adequate flexibility to account for changing market requirements and conditions.</p> <p>In the case of Carnival Way, Castle Donington, significant amount of work has been undertaken to assess the suitability of this Site for a variety of employment uses, and this has resulted in the development of a detailed masterplan. This forms the subject of an Outline Planning Application (Reference 17/01136/OUTM), which seeks consent for a mix of B1, B2 and B8 uses, with the Masterplan indicating a total of 2,480 square metres of office space across 7 no. units. Whilst this is an Outline Application and the Masterplan remains in indicative form only, it is clear that, should this Site be allocated within the Emerging Local Plan Review, it may be appropriate to provide some parameters for the percentage of floor space to be provided for each use class.</p>

<p>Respondent 9 <b>Ashby Town Council</b></p>	<p>Current Local Plan policies S3 and Ec2 should be amended to remove support for development of employment land outside limits to development when certain criteria are not met.</p>
<p>Respondent 12 <b>Willesley Environment Protection Association</b></p>	<p>Within the uses listed as being permitted within the countryside (Policy S3) WEPA is strongly opposed to the inclusion of (s) 'Employment land in accordance with the provisions of Policy Ec2' within the current adopted Local Plan. It is understood that this was added during the examination process as a temporary measure to ensure soundness of the current plan, given its failure to include adequate employment land as defined in the latest HEDNA. This is no longer necessary. If not removed, this is of particular concern as it raises the question of how effective Policy S3 will be in preventing speculative proposals for development outside the defined 'limits to development'.</p> <p>This is the even more so because the reference to the countryside's 'intrinsic character and beauty, the diversity of its landscapes, heritage and wildlife, the wealth of its natural resources and to ensure it may be enjoyed by all' was deleted from Policy S3 of the Publication Local Plan prior to the Local Plan's adoption. Para 5.21 now simply states: The NPPF recognises the need to "take account of the different roles and character of different areas" and that planning should recognise "the intrinsic character and beauty of the countryside." This is not considered strong enough to protect in particular those areas particularly valued for their landscapes, heritage and wildlife, the wealth of its natural resources and to ensure it may be enjoyed by all. Also, in terms of the value of such areas relating to health and wellbeing and tourism, as referred to later.</p> <p>Policy Ec2 (2) of the current Local Plan should be removed as all employment land need should be identified within the Plan. Otherwise, areas of open countryside surrounding Ashby would be vulnerable to development as employment land alongside key strategic routes like the A42 and A511 Ashby By Pass.</p> <p>One example of this vulnerability is the land between the A42 and Measham Road, adjacent to the A42 junction 12, the Willesley Park interchange. This length of Measham Road and the adjacent woodland and residential properties set in large landscaped plots constitutes the most attractive and environmentally rich main approach road to the town. Should such development be allowed to proceed, there would then be pressure at a later date to allow development of the remainder of open land for further industrial and/or housing development northwards, right through to Packington Nook Lane or even Lower Packington Road. The character and appearance of the countryside on this south-west side of Ashby constituting this land, known as 'Packington Nook', and the adjacent Willesley land to the west of Measham Road, is of high quality in the local context and within the District overall.</p> <p>Developers would exploit this addition (s) to Policy S3, 'Employment land in accordance with the provisions of Policy Ec2' to the full. The potential for additional allocations outside the limits to development is unacceptable.</p>

Respondent 13 <b>Litton (Donington)</b>	The site between the A453 and the M1 provides a suitable and sustainable location for employment uses and should subsequently be identified as an employment allocation in the NWLLP Review to assist in meeting the objectively assessed needs for B1a/b employment up to 2036.
Respondent 15 <b>Measham Parish Council</b>	Brownfield sites should be prioritised for release for this kind of development - incentives should be given for using brownfield sites including potential S106 monies.
Respondent 18 <b>David Bigby</b>	It is essential that the appropriate B1a/b sites are allocated in the revised plan and that Policy S3 para (s) and Policy EC2, section 2, of the current plan are deleted. These were both added during the examination process at temporary measures to ensure soundness of the current plan, given its failure to include adequate employment land as defined in the latest HEDNA. Once that allocation is made, these sections, which make great areas of the countryside vulnerable to development, are no longer required.
Respondent 21 <b>Severn Trent Water</b>	Not aware of any other options that could be considered.
Respondent 32 <b>Packington Parish Council</b>	Look at empty shop units and changing them to office and research and development units helping to regenerate run down town areas.
Respondent 41 <b>IM Properties</b>	<p>Yes.</p> <p>The needs, demands and supply of land for strategic B8 development need to be taken into account: and the needs, demands and supply of employment land in West Midlands, a functionally related economic market area, need to be acknowledged in Local Plan policy development.</p> <p>On the former point, it is notable that the Leicester &amp; Leicestershire Strategic Growth Plan acknowledges at p5 that “the amount of land needed for strategic distribution facilities has not been quantified (in L&amp;L SGP assessment of employment land needs) because it is so heavily dependent upon property marketing considerations” Therefore in that regard, and indeed across the spectrum of employment land needs, Local Plan policy should provide flexibility in response to fast changing economic contexts, challenges and opportunities and so mirror Policies Ec2 and S3 of adopted Local Plan which facilitate the favourable treatment of ad hoc planning applications for development which would meet unforeseen or unplanned need or demand.</p>
Respondent 46 <b>Ashby Civic Society</b>	Create a database of demand for employment land from requests from developers and businesses to better assess local needs
Respondent 49 <b>Quarry Plant and Industry (QPI)</b>	Note that through the preparation process of the currently adopted 2017 Local Plan an option was pursued to support employment uses on former brickworks in the District. This was referred to broadly as the ‘Brickworks and Pipeworks’ policy and specifically included the former Heather brickworks site.

	Propose a re-assessment of this entirely sound and positive planning policy approach to assist in meeting the District's employment needs and current shortfalls. It serves a 'win-win' purpose of successfully assuring the regeneration of brownfield sites and will significantly contribute the (policy-on) economic aspirations of the District and sub-region.
Respondent 52 <b>DJ and SC Smith</b>	Supportive of Option 3 as an approach to address the shortfall in employment land. Notwithstanding, consider that a more ambitious employment requirement should be considered by the Council. This would mitigate the inevitable loss of employment floor space for other uses. A proportion of the employment supply is poor quality and in need of refurbishing in order to meet modern day business requirements.  Another option would be to consider the quality of the existing employment land supply and identify those components which require upgrading. This approach would also give the Council a better control over the location of new employment development and would reduce speculative development. It would also ensure the effective reuse of land, an initiative which is actively encouraged within the NPPF – in line with aims of Industrial Strategy.
Respondent 57 <b>Hallam Land Management (Appleby Magna)</b>	Consider a criteria based approach for new large scale strategic distribution sites to meet regional/national needs.
Respondent 61 <b>Lesley Birtwistle</b>	Give incentives for building on B1 a/b employment land.

<b>Question 10 - Is the Strategic Distribution Study an appropriate evidence base on which to formulate our strategic B8 employment land policies?</b>	
Respondent 3 <b>Packington Nook Residents Association</b>	Appears that there is an oversupply in the region based on the 2016 figures so consider it more appropriate to restrict consideration to local needs.  Development of East Midlands Gateway, as an intermodal facility near to East Midlands airport, as well as the future possible development of the area around the proposed HS2 interchange at Toton, provide clear evidence that the region has more than enough capacity for strategic warehousing and distribution. This should provide the planning authority with clear evidence to limit further similar, albeit tactical, development in NWL.
Respondent 6 <b>Brackley Property Developments</b>	The minimum requirements for strategic B8 are set out in the Leicester and Leicestershire Strategic Distribution Study 2014, which was updated in 2016. Rather than split this requirement by District, the study sets out a city and county-wide requirement of 472 hectares of strategic B8 by 2036.  Accept that the Strategic Distribution Study provides a robust picture of the strategic needs for Leicestershire for larger B8 Sites.

<p>Respondent 12 <b>Willesley Environment Protection Association</b></p>	<p>It is apparent that the District has already exceeded its overall needs. It is only appropriate to consider and provide for any local needs.</p> <p>The development of the East Midlands Distribution Centre and East Midlands Gateway, both of which have the benefit of rail freight terminals, the Leicestershire International Gateway identified in the Strategic Growth Plan being prepared, and possible future development around the HS2 interchange at Toton demonstrates that the region has more than enough capacity for B8 employment land without further B8 development within the North West Leicestershire District.</p>
<p>Respondent 14 <b>Money Hill Consortium</b></p>	<p>See Question 7.</p>
<p>Respondent 15 <b>Measham Parish Council</b></p>	<p>Yes - as this is the only evidence we have to base our answer on.</p>
<p>Respondent 17 <b>Environment Agency</b></p>	<p>Yes.</p>
<p>Respondent 18 <b>David Bigby</b></p>	<p>Following Brexit, the level of economic activity in this area could fall significantly, so the likelihood is that this study overestimates the need for B8 employment land.</p>
<p>Respondent 29 <b>St Modwen Developments</b></p>	<p>Review needs to positively respond to new NPPF para 82.</p> <p>Conclusion that strategic B8 needs have been met over simplifies the need and demands within this sector and the key role that NWL has in driving economic growth in the region particularly in this large scale B8 sector. Whilst the SDS reflected the substantial land needs of the strategic distribution sector, that study is becoming out of date in the dynamic market and there are certainly strong grounds for NWL (and the Leicester/Leicestershire authorities generally) to take stock again of the significance of the large scale B8 market and its growth.</p> <p>The net residual approach set out in the Emerging Options consultation fails to recognise the specific locational advantages of NW Leicestershire which will continue to make it a focus for market needs and demands. It fails to fully assess the quality and location of supply and its alignment with market needs. It also includes the exceptional supply from East Midlands Gateway, a nationally significant provision with specialist market focus and extraordinary unit sizes and land take.</p> <p>These needs and demands of the market are not being met as suggested in the Emerging Options Consultation and are considerable, driven by a lack of quality, range, size and location in currently available sites. The direction of the Emerging Options will not meet the quality requirements of developers and occupiers, and so is misaligned with what the market is developing, buying and renting.</p>



	The land requirements in the SDS are in any event (and should always be) a minimum requirement as the aim of Government policy is to create the conditions in which businesses can invest, expand and adapt. A thorough understanding needs to be had of employment land which may be lost to other uses.
Respondent 32 <b>Packington Parish Council</b>	Whilst agree that the strategic Distribution Study is a way we don't think it takes in to account the more local areas that are not on the route but it does not take long for rat runs to become the norm causing traffic problems for the local residents.
Respondent 41 <b>IM Properties</b>	<p>The SDS's qualitative perspective on nature &amp; variety of site requirements and its identification of the M42/A42 corridor as a Key Area of Opportunity is welcome.</p> <p>However it makes no reference to needs, demands and supply in West Midlands, a functionality related economic market area: and its market perspective is limited and out of date. Therefore its quantitative perspective &amp; provisions are inaccurate &amp; unacceptable notwithstanding that its projections of need are minima.</p> <p>In this regard, it is worthy of note that the Leicester &amp; Leicestershire Strategic Growth Plan acknowledges that it does not address strategic B8 needs and at p28 sets out a requirement for "a separate study relating to logistics and distribution" that is an up to date replacement of SDS.</p>
Respondent 46 <b>Ashby Civic Society</b>	Yes, this is the starting point to get input on a national and east midlands basis.
Respondent 48 <b>TNT UK</b>	<p>The 2017 update to the Strategic Distribution Study (SDS) appears to form an appropriate technical basis from which to help understand baseline, or minimum, strategic distribution land requirements, particularly in the absence of a standard methodology.</p> <p>However, the Council will need to produce further technical work that is specific to the District, clearly accounts for the buoyant demand for relevant new land and maximises the advantageous spatial location of North West Leicestershire in relation to the storage and distribution sector (and specifically the M42/A42 corridor). In particular discussions between the Council and relevant business operators, such as TNT, to understand the sector's future aspirations would be particularly useful and welcomed by the sector.</p>
Respondent 49 <b>Quarry Plant and Industry (QPI)</b>	<p>The 2017 update to the Strategic Distribution Study (SDS) appears to form an appropriate technical basis from which to help understand baseline, or minimum, strategic distribution land requirements, particularly in the absence of a standard methodology.</p> <p>The Local Plan revision process should seek to further meet the conclusions of the SDS, whilst also addressing wider policy-on economic aspirations. This is alongside the Council providing general support for the enhancement of current storage and distribution businesses in North West Leicestershire.</p>

<p>Respondent 51 <b>Gazeley UK</b></p>	<p>Whilst the SDS forms the most recent evidence base relating to strategic B8 employment requirements across the sub-region as a whole, the updated version is now 2 years old and will be c.4 years old when the Local Plan Review is submitted for examination (based upon the deadline set out in Policy S1 of the adopted Local Plan). The original SDS will be c.6 years old at the anticipated date of submission. The SDS predates the NPPF (2018) which requires planning policies to address the specific locational requirements of storage and distribution operations at a variety of scales and suitably accessible locations. However, the SDS is not district-specific so does not meet this requirement.</p> <p>Having regard to the above, the SDS should be refreshed to ensure that the Local Plan Review is founded on an up-to-date evidence base which complies with the requirements of the NPPF (2018) including locational specificity by assessing the needs of individual districts. This is particularly important given the recognition within both the Midlands Engine Strategy and Leicester &amp; Leicestershire Strategic Growth Plan (2018) of the potential for the sub-region and district to deliver strong growth in the logistics and distribution sector.</p>
<p>Respondent 61 <b>Lesley Birtwistle</b></p>	<p>Yes.</p>

Question 11 - What should our preferred approach be to deal with strategic B8?

Option 1: Do not allocate any additional sites, as we have already met our need. We could, instead, have a general criteria based policy.

Option 2: Identify sites with permission and have a presumption of renewal.

Option 3: Allocate more sites for strategic B8 due to current market demand.

<p>Respondent 3 <b>Packington Nook Residents Association</b></p>	<p>Prefer options 1 &amp; 2. Option 3 risks the over-development of the district as a location for warehousing.</p>
<p>Respondent 6 <b>Brackley Property Developments</b></p>	<p>In terms of large scale storage and distribution uses (strategic B8 - units of over 9000sqm) NWL is a very attractive location for such uses, falling within what is known as the 'golden triangle' for the sector due to its central location and excellent transport links. Interest in warehousing and distribution in the district in recent years has been extremely high, with large scale developments.</p>

	<p>Given the level of unmet need for strategic B8 sites to 2036 and the identified attractiveness of North West Leicestershire for such uses, believe that there is a clear case for identifying and allocating further site for strategic B8 uses, based on current market demand (i.e. Option 3).</p> <p>In addition, believe that Planning Policies within the Emerging Local Plan Review should be sufficiently flexible to allow the delivery of strategic B8 floorspace in appropriate circumstances and where certain criteria are met, on sites which are allocated for other employment / commercial uses. This again will allow the market to respond to changing demand and changing / uncertain circumstances.</p>
Respondent 9 <b>Ashby Town Council</b>	Option 2 is supported.
Respondent 12 <b>Willesley Environment Protection Association</b>	Option 2: Identify sites with permission and have a presumption of renewal is favoured of the three. But see answer to question 10.
Respondent 14 <b>Money Hill Consortium</b>	Support Option 2, i.e. identify sites with permission and have a presumption of renewal.
Respondent 15 <b>Measham Parish Council</b>	Option 1
Respondent 17 <b>Environment Agency</b>	Option 2.
Respondent 18 <b>David Bigby</b>	Option 2 is preferred as there is more than enough B8 land already allocated and we need to resist further despoiling of our countryside.
Respondent 29 <b>St Modwen Developments</b>	<p>More sites need to be allocated to meet needs and demands that are not currently being met. It is evident that the current availability of sites is constraining occupiers and investment particularly in the logistics sector with a current range of sites which are not market focused or of sufficient quality and range which addresses current market demands. In order to address this, Option 3 would allow for a range of additional sites to be allocated which would address the needs of the market. It would align with wider growth strategies and address the requirement in the Framework to recognise the needs of the logistics sector particularly.</p> <p>Where needs are being highlighted that are not being met, the Framework requires LPA's to take a positive and proactive approach. The requirement for additional employment land should be addressed in a positive and growth orientated way where it can only be positive to support business needs. Requirements for employment land are a minimum and there can only be positive opportunities created by provision of additional land for investment and job creation.</p>
Respondent 32	2. Identify sites with permission and have a presumption of renewal as the principle has already been established.

<b>Packington Parish Council</b>	
Respondent 41 <b>IM Properties</b>	<p>The estimate of the supply of land for strategic B8 development is not consistent with data provided elsewhere by the Council, and ignores the fact that the supply in NWL is either already built or under construction. Therefore it provides at best a questionable basis for informed comment and, at worst, undermines the basis upon which the consultation questions were framed.</p> <p>There is no spatial analysis of supply. There is an absence of any supply – built, consented or under construction – in M42/A42 corridor. The failure to address this issue needs to be remedied in the next stages of the Local Plan Review.</p> <p>Of the options put forward:- Option 1 is untenable given known &amp; acknowledged opportunities and the scale &amp; nature of need and demand:</p> <p>Option 2 would be wrong to assume delivery of longstanding planning permissions or presume in favour of renewal of permissions as known problems and/or new evidence might point to alternative uses/development: and</p> <p>Option 3, whilst the most appropriate of those put forward and most in line with the requirements of NPPF para 82, needs to acknowledge the position set out in the SGP at p5 that “the amount of land needed for strategic distribution facilities has not been quantified (in L&amp;L SGP assessment of employment land needs) because it is so heavily dependent upon property marketing considerations” and so provide a necessary degree of flexibility (see Q11).</p>
Respondent 43 <b>JVH Town Planning</b>	Option 1. This enables flexibility to be met
Respondent 46 <b>Ashby Civic Society</b>	Would oppose a general criteria policy as this will lead to inappropriate development in unsuitable sites. Presumption of renewal is a reasonable approach (option 2). However sites need to be continually monitored for ongoing suitability and availability. There would need to be a buffer applied - suggest 20%.
Respondent 48 <b>TNT UK</b>	Option iii is considered the optimum approach to dealing with strategic B8 allocations throughout the Local Plan revision process. This is to allocate more sites for strategic B8 uses on the basis of the evidenced, high market demand in both North West Leicestershire and the wider-sub region. This reflects requirements of 2018 NPPF. Maintaining the presumption in favour of employment uses on current allocations and permissions will also work alongside this option.
Respondent 49 <b>Quarry Plant and Industry (QPI)</b>	A hybrid option of ii and iii is considered the optimum approach to dealing with strategic B8 allocations throughout the Local Plan revision process. This is to allocate more sites for strategic B8 uses on the basis of the evidenced, high market demand in both North West Leicestershire and the wider-sub region. Maintaining the presumption in favour of employment uses on current allocations and permissions will also work alongside this option, specifically sustainable sites

	<p>that currently benefit from planning permission should be retained under the presumption in favour of employment re-uses.</p> <p>It is clear that the District benefits from a significant spatial advantage in relation to storage and distribution activity. This is an asset to the both the economic context to North West Leicestershire and provides a clear, positive framework within which the revised Local Plan can operate.</p>
<p>Respondent 51 <b>Gazeley UK</b></p>	<p>It is necessary to refresh the SDS to provide an up-to-date and NPPF (2018) compliant evidence base on strategic B8 needs with consideration of individual districts. This will determine whether or not it is necessary to allocate additional strategic B8 sites in North West Leicestershire.</p> <p>Even if the existing SDS were to be relied upon it should be noted that this has identified a “minimum” requirement.</p> <p>Notwithstanding this, it is critical that policies within the Local Plan Review facilitate the successful delivery of existing Local Plan allocations and permissions (with a presumption of renewal) – e.g. “Former Lounge Disposal Point” (EC1a) should be allocated for employment development rather than identified as an existing permission – due to part of site being required for HS2 and therefore additional land being needed.</p> <p>In addition, maximum flexibility must be built into the Plan to ensure that long-term strategic B8 needs are delivered through to 2036 (as required by NPPF para. 11a). As market requirements can change over such an extended period, support the retention of a criteria-based policy in the adopted Local Plan (Ec2(2)), regardless of whether or not additional land is allocated.</p>
<p>Respondent 57 <b>Hallam Land Management (Appleby Magna)</b></p>	<p>Support Option 3: Allocate more sites for strategic B8 due to current market demand.</p>
<p>Respondent 61 <b>Lesley Birtwistle</b></p>	<p>Option 2.</p>

Question 12 - Are there any other options that we could consider?	
<p>Respondent 3 <b>Packington Nook Residents Association</b></p>	<p>A policy that assumes permission on those sites will be renewed, should it lapse for any reason, is acceptable. Consideration should be given to amending the permissions to increase the amount of office and mixed employment land as there is an oversupply in the region of distribution sites.</p>

	There is still too much concentration on the road network for freight transport and intermodal rail warehousing locations should be proposed in conjunction with other authorities on a regional basis. Sustainable rail should be a key objective of any planning policy relating to warehousing and distribution.
Respondent 12 <b>Willesley Environment Protection Association</b>	Option 2 but amending the permission to allow only for office use to meet present under provision.
Respondent 15 <b>Measham Parish Council</b>	Brownfield sites should be prioritised for release for this kind of development - incentives should be given for using brownfield sites including potential S106 monies.
Respondent 18 <b>David Bigby</b>	No.
Respondent 32 <b>Packington Parish Council</b>	Perhaps look at sites with access to a rail head. Reducing the need for larger traffic movements.
Respondent 41 <b>IM Properties</b>	Local Plan policy for strategic B8 should provide flexibility in response to fast changing economic contexts, challenges and opportunities and so mirror Policies Ec2 and S3 of the adopted Local Plan which facilitate the favourable treatment of ad hoc planning applications for development which would meet unforeseen or unplanned need or demand.
Respondent 46 <b>Ashby Civic Society</b>	As above a modified option 2 would be appropriate.
Respondent 49 <b>Quarry Plant and Industry (QPI)</b>	<p>Note that through the preparation process of the currently adopted 2017 Local Plan an option was pursued to support employment uses (including strategic storage and distribution uses) on former brickworks in the District. This was referred to broadly as the 'Brickworks and Pipeworks' policy and specifically included the former Heather brickworks site.</p> <p>We propose a re-assessment of this entirely sound and positive planning policy approach to assist in meeting the District's employment shortfalls. It serves a 'win-win' purpose of successfully assuring the regeneration of brownfield sites and will significantly contribute the (policy-on) economic aspirations of the District and sub-region.</p>
Respondent 57 <b>Hallam Land Management (Appleby Magna)</b>	See Question 9.

Question 13 - Do you agree that the settlement hierarchy policy should be amended so as to allow for some development in small villages where it can be demonstrated that it is to meet the needs of somebody with a local connection?

<p>Respondent 3 <b>Packington Nook Residents Association</b></p>	<p>This is agreed, however additional small increases in habitations should also be permitted where there is demand and where it can be demonstrated that sufficient sustainable services are available in the locality.</p> <p>Locating any significant amount of development in the countryside where there are insufficient services, sustainable public transport, shops, schools, good roads, access to healthcare and high-speed broadband will not be attractive.</p>
<p>Respondent 5 <b>Historic England</b></p>	<p>There are likely to be very strong concerns / objections regarding Option 2 if it is proposed to merge historic settlements, where their relationship and distinction from Each other is frequently of particular importance.</p>
<p>Respondent 7 <b>Home Builders Federation</b></p>	<p>The settlement hierarchy policy should be reviewed.</p>
<p>Respondent 9 <b>Ashby Town Council</b></p>	<p>The proposed amendment to the settlement hierarchy is supported and hamlets should be included to allow some development where it will meet the needs of somebody with a local connection.</p>
<p>Respondent 12 <b>Willesley Environment Protection Association</b></p>	<p>Yes, but extend this to include hamlets in addition to small villages.</p>
<p>Respondent 15 <b>Measham Parish Council</b></p>	<p>Yes.</p>
<p>Respondent 18 <b>David Bigby</b></p>	<p>Yes.</p>
<p>Respondent 19 <b>Ruth Mulvany</b></p>	<p>The settlement Hierarchy should allow some development in all villages as the smaller villages are suffering and businesses including shops and cafes are closing because there is no new development. Most of the small villages now are commuter villages. There is no diversity or mix in smaller villages as only people that qualify for a council house if there actually is one or have a large income to buy a house in a smaller village. There is no middle ground for the average working person particularly single income families.</p>
<p>Respondent 21 <b>Severn Trent Water</b></p>	<p>No objection to the amendment of the settlement hierarchy for small villages, provided that the changes do not allow significant increases in the scale of cumulative development around small villages.</p> <p>The sewerage systems within most small villages are consistent with their scale therefore smaller developments can have a more significant impact than they would on the Sewerage system within a city. Would however not anticipated that there would be significant changes to the scale of a small village without specific policies around growth.</p>

	<p>Small scale development generally passes under the assessment radar due to its scale of impact, but awareness is needed to tackle cumulative impacts from multiple sites. Better understanding of where the small scale growth will be located will assist with infrastructure planning.</p>
<p>Respondent 23 <b>Harworth Group</b></p>	<p>No comments on the proposed amendment to the settlement hierarchy.</p> <p>In accordance with SGP, review will need to consider new settlement options and, as necessary, the settlement hierarchy will need to be updated to reflect this planned growth.</p>
<p>Respondent 24 <b>Gladman Developments</b></p>	<p>Supportive of the move by the Council to permit a broader scope of development in the authority's smaller settlements. The adoption of this approach will help sustain a higher rate of housing delivery within the authority and be more effective in sustaining rural communities.</p> <p>The Council should look to review its settlement hierarchy and the means of distribution. Particular attention should be given to how communities have evolved since this was last studied during the preparation of the adopted Local Plan. The level of service provision in some areas would have altered since it was last surveyed. Greater weight should be given to access to broadband.</p> <p>The Council should also have regard whether development (and committed development) already provided through the Local Plan has altered communities, in terms of their identity and physical characteristics.</p> <p>Coalville Urban Area should be expanded to include Ellistown.</p> <p>Welcome inclusion of Moira as a sustainable village – these should have a greater role in meeting future housing need. Review should identify allocations for housing in Moira.</p> <p>Allocations should be sought at the top four tiers of the settlement hierarchy, with flexibility in policy enabling small scale provision in the fifth tier.</p> <p>Do not object to the identification of new settlements or sustainable urban extensions, however the assumptions made regarding their deliverability and contribution during the plan period must be realistic and informed by extensive evidence. The supply should be supplemented by medium and smaller sites which are generally less complex to develop and therefore more capable of delivery in the short term.</p>
<p>Respondent 27</p>	<p>No comments on the proposed amendment to the settlement hierarchy.</p>



<b>Hallam Land Management (Packington Nook)</b>	Policy S2 sets out that Ashby de la Zouch, along with Castle Donington, is classified as a 'Key Service Centre', which is the second tier of the settlement hierarchy, after the 'Principal Town' of the Coalville Urban Area. Whilst this hierarchy is supported and reflects the sustainability credentials of Ashby de la Zouch, it is considered that Ashby de la Zouch should be a higher order settlement than Castle Donington – due to population size and availability of services and facilities. This approach is supported by Policy Ec9 of the Local Plan.
Respondent 28 <b>Cadwallader Family</b>	Fully support the principle of revising Policy S2: Settlement Hierarchy to enable the delivery of housing in Small Villages to meet local needs. However, it is important that the Council considers the implications of this revision as a whole. The proposed revision will inevitably increase the level of housing delivery further down the settlement hierarchy and allowing this to occur in isolation, without any increase in the delivery of housing in higher order settlements, would be unsustainable. Council should consider widening scope for housing delivery at higher order settlements.
Respondent 30 <b>Intro Crowd</b>	The existing hierarchy is supported.
Respondent 32 <b>Packington Parish Council</b>	Do think that the settlement hierarchy policy should be amended to allow for some development in small villages where it can be demonstrated that it meets the needs of somebody with a close local family connection. and every effort should be made that it remains for local people in perpetuity and not just the first person.
Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson</b>	If a local need has been demonstrated, then it seems sensible to allow opportunity for the said need to be met within the settlement. The mechanics of which however require careful consideration to ensure delivery and that the policy is enforceable.
Respondent 36 <b>Mr and Mrs B Sutton</b>	<p>If a local need has been demonstrated, then it seems sensible to allow opportunity for the said need to be met within the settlement. The mechanics of which however require careful consideration to ensure delivery and that the policy is enforceable.</p> <p>Settlement hierarchy should be amended to better reflect SGP – particularly with regard to LIG. Consider that small element of this growth should be directed to smaller settlements in close proximity to LIG – e.g. Breedon on the Hill. Small developments in such locations not only contribute to wider strategy but also contribute to meeting District's housing requirements. Breedon should be elevated within Hierarchy or given special dispensation to deliver a reasonable amount of housing.</p>
Respondent 37	The existing hierarchy is supported.

<p><b>Western Range</b></p>	<p>It remains important to provide for growth in existing sustainable settlements. Question that future growth should be managed in larger towns. Local Plan should provide a portfolio of sites, including strategic sites developed beyond plan period, along with sites in more sustainable settlements.</p>
<p>Respondent 38 <b>Rentplus UK</b></p>	<p>Proposed changes to Policy S2 – Settlement hierarchy remain too restrictive, failing to reflect emphasis in revised NPPF para 77. The NPPF requires sustainable development in rural areas to be promoted, being located where it will enhance or maintain the vitality of rural communities (paragraph 78); restricting development at the Sustainable and Small Villages to within the Limits to Development only fails to adequately respond to the potential opportunities to meet local housing needs. Policies should instead identify opportunities for villages to grow and thrive, and to acknowledge that development in one village may support services in a village nearby.</p> <p>The policy should be amended as follows:</p> <p><i>Sustainable Villages</i> <i>Settlements which have a limited range of services and facilities where a limited amount of growth will take place within <u>or adjacent to</u> the defined Limits to Development.</i></p> <p><i>Small Village</i> <i>Settlements with very limited services and where development will be restricted to <u>meet identified housing needs on sites within or adjacent to</u> the Limits to Development and where the proposed development is limited to <del>a single dwelling</del> to meet the needs of a person(s) who satisfies one of the following local connection requirements.</i></p> <p>In response to Question 13, support Option 4. Widening the scope of development permitted at Small Villages would encourage further development to come forward in appropriate locations to meet identified housing needs, with the Council retaining the ability to restrict the scale and location of development. Restricting the level of development to single dwellings only is unnecessarily prohibitive, restricting the ability to respond to local housing needs and improve the sustainability of individual settlements.</p>
<p>Respondent 39 <b>David Wilson Homes (East Midlands)</b></p>	<p>Current settlement hierarchy is generally soundly based. Proposed change to allow for a very limited level of development in small villages is generally supported – provided that the level of development remains low and is tied into those with a local connection.</p> <p>The primary focus of the plan should be on the delivery of homes in sustainable settlements, such as Measham. Any changes to the Settlement Hierarchy should not undermine the focus on sustainable settlements and put the plan at risk of leading to unsustainable patterns of development.</p>

	<p>Measham should be a focus of growth within the next plan given the scale of development currently committed in the village. The housing trajectory already shows significant commitments at other higher order settlements.</p>
<p>Respondent 40 <b>Davidsons Developments</b></p>	<p>The existing hierarchy is supported.</p> <p>As part of the revised plan, the limits to development for Blackfordby will need to be amended to reflect the consent granted at Butt Lane, Blackfordby.</p>
<p>Respondent 42 <b>Parker Strategic Land</b></p>	<p>Ibstock's role in the settlement hierarchy should be maintained. Given Ibstock's characteristics and its suitability for new housing, it would be reasonable to expect a comparable level of new housing to be directed to the town in the future. New allocations will be necessary to achieve this as the extent of previous planning permissions have now been, or will shortly be, built out.</p> <p>Do not object to this proposed change to Policy S2, however, in the context of the overall housing supply strategy it is important to recognise that this will have a limited effect. The proposed revision to the policy would permit single dwellings in such locations, and as such this is unlikely to represent a material supply of new housing land such that it would change the distribution strategy.</p>
<p>Respondent 43 <b>JVH Town Planning</b></p>	<p>The current plan has located the majority of the housing allocations in Coalville and Ashby on large urban extensions. These sites take many years to commence and are under construction for many years. A more balanced approach to the location of new development should be undertaken which will allow more development in the <u>sustainable villages</u> which will assist in the maintaining of services and provide more housing choice. This type of approach will allow for the inclusion of more medium and small sites, adding flexibility to the plan and increase delivery rates.</p>
<p>Respondent 44 <b>Hanson UK</b></p>	<p>Yes – although it would be more flexible if the policy allowed for sites within or adjoining limits to development where there is a local connection.</p>
<p>Respondent 46 <b>Ashby Civic Society</b></p>	<p>No.</p>
<p>Respondent 47 <b>Whitwick Parish Council</b></p>	<p>Totally agree - More sustainable and affordable for the community without being to the detriment of existing residents.</p>
<p>Respondent 52 <b>DJ and SC Smith</b></p>	<p>Home Farm is located to the west of Castle Donington which is identified as a Key Service Centre. It is not necessary to provide comments regarding the development of small villages at this time. Notwithstanding, this is on the premise that new development in small villages does not prejudice the delivery of sustainable development elsewhere in the borough.</p>
<p>Respondent 53 <b>Redrow Homes</b></p>	<p>Ravenstone is within close proximity to the Coalville Urban Area and its facilities and services, to the benefit of the residents of Ravenstone and the sustainability of the village. Ravenstone is therefore generally more sustainable than the majority of other Sustainable Villages and its position in the settlement hierarchy should be re-evaluated on this basis.</p>

<p>Respondent 55 <b>Rosconn Group</b></p>	<p>We agree that the current approach to the settlement hierarchy should be reviewed as it is overly restrictive and does not adequately address the needs of smaller settlements in accommodating new housing and other development necessary to help maintain and improve their longer-term vitality and sustainability, as supported by paragraph 78 of the NPPF.</p> <p>Research recently undertaken by the CLA “Sustainable Villages – Making Rural Communities Fit for the Future” highlights how outdated sustainability assessments and a static approach to rural planning have led to the stagnation of rural communities by restricting development and leading to a cycle of decline. This is not just a problem in respect of local needs housing, and not confined to only the Small Villages. For instance, Sustainable Villages are equally restricted in terms of their ability to accommodate growth due to overly restrictive Limits to Development. None of the Options adequately address this issue and therefore, we would recommend considering an option which supports proportionate growth on the edge of, but well related to existing villages to allow suitable and sustainable growth to occur. There are many examples of where such an approach has been adopted by other Local Plans including West Oxfordshire’s recently adopted Local Plan and the emerging Local Plan for Stroud for instance.</p>
<p>Respondent 56 <b>Davidsons Developments (Ibstock)</b></p>	<p>Current settlement hierarchy is generally soundly based, although there may be a case for Ibstock to be classified as a Key Service Centre, given the level of service provision and population. Proposed change to allow for a very limited level of development in small villages is generally supported – provided that the level of development remains low and is tied into those with a local connection.</p> <p>The primary focus of the plan should be on the delivery of homes in sustainable settlements, such as Ibstock. Any changes to the Settlement Hierarchy should not undermine the focus and put the plan at risk of leading to unsustainable patterns of development.</p> <p>To ensure that the role of Ibstock is maintained moving forward, the balance of growth directed to the village needs to reflect the current lack of commitments in the village – as well as the level of commitments elsewhere.</p>
<p>Respondent 57 <b>Hallam Land Management (Appleby Magna)</b></p>	<p>No comments on this proposed amendment to the settlement hierarchy – however consideration should be given to the implications of employment growth throughout the district and for housing growth to have regard to this in addition to the settlement hierarchy. In particular, it should be noted that the SGP identifies that: “Sometimes those who want to live in good quality homes close to their place of work find that there is little available within their price range. Several major employers and clusters of economic opportunities are located towards the edge of the County. Not all are close to housing so a great deal of commuting takes place”.</p> <p>The SGP also seeks to focus growth at strategic locations; should the Junction 11, M42 employment proposal come to fruition, it is considered that this would then constitute a strategic location. Accordingly, it is appropriate for the Plan to</p>

	consider redefining the growth levels expected in the various settlements, depending on where future employment generating growth occurs and having regard to the SGP.
Respondent 58 <b>Taylor Wimpey</b>	Yes - agree in principle that the settlement hierarchy policy should be amended to allow for greater flexibility to address the housing needs of the local population. However, do not agree that the prescriptive nature of the amendment to the policy in respect of small villages is justified. The small villages are in reality sustainable locations for development, with their own services, facilities and amenities, which are capable of supporting the local population. Increased development helps to support these local communities and ensures that they do not endure the problems associated with an ageing population and the closure of the existing facilities within the village.
Respondent 61 <b>Lesley Birtwistle</b>	Yes.

Question 14 - Do you agree with the suggested criteria for identifying somebody with a local connection? Are there any additional criteria which should be included?	
Respondent 9 <b>Ashby Town Council</b>	The suggested criteria are supported.
Respondent 12 <b>Willesley Environment Protection Association</b>	The suggested criteria are generally accepted. However, the final point: <i>A planning obligation will be required which restricts the initial occupancy to the applicant for a period of at least three years and secures that the dwelling remain available to somebody who meets the local connections criteria in perpetuity.</i> 'In perpetuity' would appear somewhat unreasonable. It is suggested that this should be relaxed if the owner has demonstrated over a reasonable time that he has been unable to sell the property subject to this obligation at its market value. This is similar to something I have experienced with regard to a property that had an obligation that it must be occupied by a person engaged in agriculture.
Respondent 15 <b>Measham Parish Council</b>	Yes. Anyone employed in the village for 2+ years should be entitled to build a property
Respondent 18 <b>David Bigby</b>	Agree.
Respondent 19 <b>Ruth Mulvany</b>	I think the suggested criteria is much too restrictive. The criteria should be the same as the housing register and self build register where a local connection is that you already you live anywhere within the district. The self build register asks if there is a particular part of the district you would prefer to build in. The housing register also asks which village you would prefer to live in. The local connection should not be restricted to a parish as this will mean mortgage lenders will not lend to self builders to build. Once again this means people that already have the means to build can build and those that wish to build but need a mortgage cannot. The village diversity is limited once again.

	<p>Plots come up for sale very rarely. I have been looking for 12 years for an affordable plot and been on the self build register since it began in 2016. There are so few self builders (40) that a policy that is fair and proportionate can easily accommodate them without any risk.</p>
<p>Respondent 23 <b>Harworth Group &amp;</b> Respondent 27 <b>Hallam Land Management</b> <b>(Packington Nook)</b></p>	<p>Such a policy would be difficult to enforce and may be open to abuse – would therefore suggest against including local connection criteria.</p>
<p>Respondent 32 <b>Packington Parish Council</b></p>	<p>Agree with the suggested criteria but making sure that it stays in for future residents and not just the first.</p>
<p>Respondent 38 <b>Rentplus UK</b></p>	<p>Consider the local connection requirements set out within this policy to be unnecessarily onerous. Restricting occupancy to those who have been located within the parish for at least 10 years significantly limits the number of households who may be assisted into appropriate housing. Use of such strict local occupancy restrictions also causes short and long term management difficulties for Registered Providers upon first and subsequent occupancy.</p> <p>More typical for a local occupancy policy to be set out within a separate housing policy document, outside planning policy. Recommend that it, and the remainder of the proposed text in relation to Small Village developments be removed from Policy S3 and instead be set out within the affordable housing policy as these are specific development management issues and should not form part of the settlement hierarchy strategy.</p> <p>Should the Council decide it appropriate to retain some form of restrictions, recommend the below text replaces the (current proposed) bullet point list:</p> <ul style="list-style-type: none"> <li>• <i>Residents of the area of North West Leicestershire for 6 of the last 12 months</i></li> <li>• <i>Residents of the district for 2 of the last 5 years</i></li> <li>• <i>Those with permanent employment in the district</i></li> <li>• <i>Residents of the district with an essential need to provide support for a close family member (who have been resident for the last 5 years)</i></li> <li>• <i>Those with close relatives or carers living in the district (who have been resident for the last 5 years)</i></li> </ul> <p>The sentence relating to applicants being required to demonstrate lack of available properties is more appropriate within a separate housing policy and should be removed entirely as it is not a development management issue but an issue of determining the level of need in an area.</p>

	<p>Sentence relating to applicants being registered on the Council's self and custom build register appears here to be additional to the other points relating to the delivery of affordable housing and should be clarified to prevent confusion. The Council's proposal for a separate policy on the delivery of these options is suitable in this context.</p> <p>The planning obligation section of the policy also should be amended to properly restrict affordable housing in accordance with the new definitions set out within the revised NPPF.</p>
Respondent 46 <b>Ashby Civic Society</b>	No.
Respondent 47 <b>Whitwick Parish Council</b>	We believe the close family member should include grandparent/grandchild.
Respondent 55 <b>Rosconn Group</b>	See Question 13.
Respondent 58 <b>Taylor Wimpey</b>	No - do not agree with the suggested criteria as do not believe that the stipulation is justified in a small village. This is more akin to an affordable housing restriction which would normally be sought through a S106 mechanism. The existing housing needs evidence should justify a requirement for a restriction if required for local needs, which typically would be sought through the range of affordable housing tenures available; low cost market housing (starter homes), private rented sector (PRS) delivered by Registered Social Landlords together with the more traditional affordable housing tenures.
Respondent 61 <b>Lesley Birtwistle</b>	Yes except should include grandchild in the definition of close family member.

Question 15 - Are there any other options which we should consider if we are to address local needs? Do you agree with our assessment of these options?	
Respondent 3 <b>Packington Nook Residents Association</b>	Other Options 2 and 3 are also supported.
Respondent 12 <b>Willesley Environment Protection Association</b>	Options 2 and 3 are supported.
Respondent 15 <b>Measham Parish Council</b>	Yes. No.
Respondent 18 <b>David Bigby</b>	Include hamlets in above criteria.

<p>Respondent 19 <b>Ruth Mulvany</b></p>	<p>Demonstrating a ‘strong local connection’ requires that at least one adult resident of each affordable Self Build dwelling shall have to demonstrate to the Local Authority that they satisfy the criteria below, which shall be inserted into a S106 agreement; Affordable self build dwellings on rural exception sites shall be occupied and at all times subsequently occupied by a person who:-</p> <ul style="list-style-type: none"> <li>• has immediately prior been resident within the parish or neighbouring rural parishes, or;</li> <li>• has a strong local connection with the parish, including any two of the following:</li> <li>• family associations within the parish or neighbouring rural parishes;</li> <li>• any periods of ordinary residence in the parish or neighbouring rural parish not immediately before the date upon which any Affordable Dwelling becomes vacant; and/or</li> <li>• has current employment of a non-casual nature in the parish or neighbouring parishes.</li> </ul> <p>Subject to viability evidence, open market self build plots may also be appropriate to enable the development of affordable housing on Rural Exceptions sites in accordance with Local Plan policy WE5 to support the delivery of affordable housing in rural areas.</p> <p>Taken from Teignbridge local plan self build policy.</p>
<p>Respondent 21 <b>Severn Trent Water</b></p>	<p>As per the response to question 13, care should be taken to prevent an extensive or unconstrained development from occurring for this reason anticipate that option will represent the best approach to change the small villages policy.</p>
<p>Respondent 23 <b>Harworth Group &amp;</b> Respondent 27 <b>Hallam Land Management (Packington Nook)</b></p>	<p>See Question 15.</p>
<p>Respondent 32 <b>Packington Parish Council</b></p>	<p>Agree with assessment of options.</p>
<p>Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson &amp;</b> Respondent 36 <b>Mr and Mrs B Sutton</b></p>	<p>It is not considered likely that many people who are in demonstrable local need and unable to purchase a suitable property within a settlement will be able to satisfy their own housing need by self-build, which this policy appears to insinuate. A more sensible approach would be to publish any established local housing needs and allow the market to deliver that need, either as part of an affordable housing scheme or market housing scheme. Without such provision, the policy is highly exclusive, as the ability and finance to deliver a self-build unit will preclude a high percentage of the population.</p>



Respondent 38 <b>Rentplus UK</b>	Would be useful for the Council to re-evaluate its affordable housing policies to ensure these are suitably reflective of the revised NPPF. If the Council is to amend its housing mix policy, as currently set out in Policy H4 of the adopted Plan, then this should seek to meet as much of the local housing needs as possible. An assessment should be undertaken of the capacity for the new tenures of affordable housing as defined in Annex 2 of the NPPF to meet local housing needs to inform any revisions required to better reflect that updated understanding of local needs.
Respondent 46 <b>Ashby Civic Society</b>	No.
Respondent 47 <b>Whitwick Parish Council</b>	<p>Strongly disagree that Whitwick should form part of the Coalville Urban Area and should be classed as a Sustainable Village. It is clearly a separate community, has its own active and supported parish council that identifies strongly with the village. Residents have fought and campaigned successfully for many years to maintain and protect our village identity and character. Whitwick Parish Council is strongly committed to protecting the Area of Separation (formerly referred to as the Green Wedge). The District Council recognised the community identity at Whitwick when they completed the governance review in 2010 in accordance with Section 83 of the Local Government and Public Involvement in Health Act 2007, which indeed recommended and resulted in the parish council being created to give a strong independent voice for the village community.</p> <p>The Area of Separation is working well and protecting the communities that it is designed to serve.</p>
Respondent 50 <b>Mr and Mrs Mansfield</b>	Do not wish to make comments on any of the six Options specified within the consultation, but would like to highlight the sustainability credentials of sites that do not fall within defined settlement limits.
Respondent 55 <b>Rosconn Group</b>	See Question 13.
Respondent 58 <b>Taylor Wimpey</b>	There are alternatives which should be considered in respect of providing for a range of housing needs to reflect the requirements of the local population, in this regard a range of supported housing for the elderly may be appropriate. Sheltered housing and those with an element of care should be considered.
Respondent 61 <b>Lesley Birtwistle</b>	Could consider Options 2 and 4. The concern about this is the lack of facilities and use of private vehicles but in practice most villages, not just small villages, have very poor public transport connections and very limited facilities and the majority of residents access facilities outside the settlement and use cars. Slight growth in settlements can improve community well-being and self-help and the likelihood of shared lifts to bigger centres.

<b>Question 16 - Is this general approach to site assessment methodology an appropriate one?</b>	
Respondent 3	Site assessment approach is currently too dependent on developers bringing forward sites, rather than sites being promoted as a result of council policies. Development of Coalville as the principal centre is supported by council policies,

<b>Packington Nook Residents Association</b>	<p>but not reflected in the developer aspirations (where sites at Ashby de la Zouch are being driven, due to the profitability of building there).</p> <p>Site assessment methodology should prioritise council policies.</p>
Respondent 4 <b>Natural England</b>	<p>Have no particular preference on the strategy options but would wish to ensure that the chosen approach results in no adverse impact on any designated nature conservation sites or protected landscapes. Development should avoid Best &amp; Most Versatile Land (BMV) where possible.</p> <p>Pleased to note that revised policy S2 (Settlement Hierarchy) reiterates the requirement for any development which discharges wastewater into the Mease catchment will be subject to the provisions of policy En2.</p>
Respondent 7 <b>Home Builders Federation</b>	<p>The HBF submit no comments on the selection of individual sites. As set out in the 2018 National Planning Policy Framework (NPPF) the strategic policies of the LPR should provide a clear strategy for bringing enough land forward and at a sufficient rate to address housing needs over the plan period by planning for and allocating sufficient sites to deliver strategic priorities (para 23).</p>
Respondent 8 <b>Coal Authority</b>	<p>In general terms yes.</p>
Respondent 9 <b>Ashby Town Council</b>	<p>The methodology is considered reasonable.</p>
Respondent 12 <b>Willesley Environment Protection Association</b>	<p>The methodology appears to be reasonable. However there needs consideration of how the Local Plan should ensure that actual development distribution in accordance with the Local Plan can be achieved, and not driven by developers seeking consents in locations which are most attractive to them in terms of housing sales and profit margins, such as Ashby, as referred to in our response to question 2.</p>
Respondent 14 <b>Money Hill Consortium</b>	<p>The approach outlined on page 15 of the consultation document is robust. The Local Planning Authority will invite expressions of interest and these will be sieved to inform a short-list to be development. This approach to site selection will need to be transparent and those sites that do not make the short-list should be provided with the opportunity to supplement the evidence base for the Local Planning Authority to review.</p>
Respondent 15 <b>Measham Parish Council</b>	<p>Yes</p>
Respondent 16 <b>Christopher Waltho</b>	<p>Earlier SHLAAs have credited sites put forward as being sustainable when it later proved that they were not. Cameron Homes' development off Church Lane in Ravenstone was unsustainable to the extent that it could not deliver the level social infrastructure support (including affordable housing) that it was supposed to. This was in spite of the SHLAA stating unequivocally that the development of the land off Church Lane was sustainable. The discrepancy led me to seek a copy of the developer's viability appraisal for the site, and NWLDC was directed to release to me a redacted version of this by the</p>

	Lands Tribunal. It indicated to me that, having regard to the sale value of the new homes actually achieved by the developer, a contribution towards much needed affordable housing in NWL could have been made. The Planning Authority should be aware that if land is stated as being sustainable in the SHELAA, and it subsequently transpires that the developers of such land are unable to meet their social infrastructure obligations as prescribed in the Local Plan, there may well be further demands to see viability appraisals which could hamper the delivery of new schemes in the District with calls for Planning decisions to be referred for judicial review.
Respondent 17 <b>Environment Agency</b>	Yes.
Respondent 18 <b>David Bigby</b>	Yes, provided full cognisance is taken of the new Ashby Neighbourhood Plan and particularly its Local Green Space policy.
Respondent 19 <b>Ruth Mulvany</b>	Yes, however housing should not be supported on major sites outside the limits to development. We lose vast ecosystems and areas of countryside. Smaller sites in all of the villages would allow a more balanced growth and support local smaller developers rather than the big national and regional developers that land bank.
Respondent 23 <b>Harworth Group</b>	<p>Agreed that the approach to site selection should have regard to both Policy S2 and the SGP in assessing the suitability of sites for development – including opportunities to provide more development in major strategic locations – eg LIG. As the SGP looks to deliver development in strategic locations, the spatial strategy will need to be reconsidered, and the Council should have an understanding of the new spatial strategy before undertaking a review of the approach to site assessment methodology.</p> <p>Consultation confirms a long list of sites will be identified through SHELAA process and the initial assessment undertaken before remaining sites are assessed against a range of criteria and sustainability appraisal. Approach is supported in principle, but there is no clear guidance on the proposed stages of site assessment. Council should outline in further detail approach it will take to site assessment and allow for consultation opportunity.</p>
Respondent 27 <b>Hallam Land Management (Packington Nook)</b>	<p>Agreed that the approach to site selection should have regard to both Policy S2 and the SGP in assessing the suitability of sites for development. Approach should also have regard to potential changes to the settlement hierarchy – particularly with reference to our submission that Ashby de la Zouch should be a higher order settlement compared with Castle Donington (see response to Question 13 above). As the SGP looks to deliver development in strategic locations, the spatial strategy will need to be reconsidered in light of this, and the Council should have an understanding of the new spatial strategy before undertaking a review of the approach to site assessment methodology.</p> <p>Consultation confirms a long list of sites will be identified through SHELAA process and the initial assessment undertaken before remaining sites are assessed against a range of criteria and sustainability appraisal. Approach is supported in</p>

	principle, but there is no clear guidance on the proposed stages of site assessment. Council should outline in further detail approach it will take to site assessment and allow for consultation opportunity.
Respondent 30 <b>Intro Crowd &amp;</b> Respondent 37 <b>Western Range &amp;</b> Respondent 40 <b>Davidsons Developments</b>	In terms of the approach to assessing potential sites, those sites submitted to the SHELAA falling within or adjoining Coalville Urban Area, Key Service Centres, the Local Service Centres and Sustainable Villages should be thoroughly assessed.  The Options Paper does not provide any clear guidance on the approach to site assessment. The Council should prepare a paper outlining in further detail the approach it will take to the assessment of sites and provide further opportunity for stakeholders to comment on the proposed methodology.
Respondent 32 <b>Packington Parish Council</b>	It is but some sites may be lost if they are sieved out before a more extensive assessment is carried out.
Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson &amp;</b> Respondent 36 <b>Mr and Mrs B Sutton</b>	The approach proposed seems sensible and is largely consistent with that which has been completed elsewhere.
Respondent 39 <b>David Wilson Homes (East Midlands) &amp;</b> Respondent 56 <b>Davidsons Developments (Ibstock)</b>	An assessment methodology which follows the following three steps is supported:  1. Sites to be put forward for consideration by landowners and developers through the call for sites, collecting baseline information  2. Review of the 'long list' of sites against a site of high-level criteria, removing those which are Unsuitable  3. The suitability, availability and deliverability of those sites remaining in the assessment is assessed in more detail against a set of agreed criteria.  The initial sieve of sites should only remove those sites which are clearly unsuitable for development. Criteria relevant to this stage of the assessment could include flood risk or detachment from a settlement boundary. At this initial stage sites should not be removed on the basis that they do not fit with a locational strategy, as is suggested in the consultation.

	<p>The availability of suitable sites in particular areas of the District should help to shape the locational strategy – the strategy should not be limited to areas where there may not be sufficient suitable sites. This would potentially lead to sites being ruled out of consideration prematurely and sustainable options not taken forward as part of the plan.</p> <p>The assessment of suitable sites and their potential contribution to a sustainable strategy for growth should be the next step in the process, which is where decisions on the split of development between different areas and strategic decisions can be made.</p>
<p>Respondent 41 <b>IM Properties</b></p>	<p>No.</p> <p>The Leicester &amp; Leicestershire Strategic Growth Plan does not address strategic B8 needs indeed, it sets out at p28 a requirement for “a separate study relating to logistics and distribution” This Study should provide a vital input to Local Plan policy development and be acknowledged in the design of the site assessment methodology or the policy vacuum acknowledged and appropriate provision made for potential strategic B8 sites.</p> <p>In the absence of L&amp;L SGP policy, the Strategic Distribution Study’s Key Areas of Opportunity should inform the process.</p> <p>Reasonable alternative spatial strategies need to be developed &amp; explored in consultation with stakeholders and any sieve designed accordingly. However an overly doctrinaire approach to sieving must be avoided in order for the Local Plan Review to be seen to be conducted in a way that provides the flexibility necessary to exploit opportunities and to respond to market signals.</p>
<p>Respondent 43 <b>JVH Town Planning</b></p>	<p>Development should be distributed as set out in response to question 13 which will give more growth in the Sustainable Villages. Sites will be sieved against National and Local criteria. The sites selection methodology should be the subject of a consultation once the parameters are established. It is crucial that sites are properly evaluated on the information available and what is also provided by stakeholders.</p>
<p>Respondent 44 <b>Hanson UK</b></p>	<p>As the principal urban area is Coalville and this is to remain at the top of the spatial hierarchy – it would be appropriate to thoroughly assess each of those sites submitted under the SHELAA capable of delivering development in the principal urban area.</p>
<p>Respondent 46 <b>Ashby Civic Society</b></p>	<p>Yes.</p>
<p>Respondent 47 <b>Whitwick Parish Council</b></p>	<p>No.</p>
<p>Respondent 49</p>	<p>No, the application of policy screening in relation to the assessment of potential sites emerging through the Local Plan process is an unsound approach. The purpose of the SHELAA process is to obtain a ‘basket’ of potential sites for</p>

<p><b>Quarry Plant and Industry (QPI)</b></p>	<p>consideration that need to be assessed, with all things being equal, on a wider range of social, economic and environmental criteria. To apply a policy-on screen in the first instance acts to both pre-determine the status or weight of emerging planning policy and unsuccessfully applies adopted/outdated planning policy to what may be a changing policy context.</p> <p>Therefore, all sites need to be given equal status during the assessment and Sustainability Appraisal process to assure parity and to avoid the miss-application of adopted/outdated and emerging planning policy. This is particularly important given the stated significance of the SGP which is seeking to achieve high aspirational growth levels in the sub-region through to 2050, therefore a much longer-term and positive view must be adopted to the site identification process.</p>
<p>Respondent 52 <b>DJ and SC Smith</b></p>	<p>Broadly support the Council's approach towards the spatial distribution of development, ensuring that it is in accordance with the settlement hierarchy.</p> <p>Notwithstanding, it is important that new development is delivered in sustainable locations which are capable of accommodating growth, and where there is an identified need. In this regard, the spatial distribution for new development within the region has already been shaped by the SGP and its identification of areas subject to strategic infrastructure improvements. The Council;s strategy needs to align with this.</p> <p>In devising its strategy for the spatial distribution of development, the Council needs to consider the quantum of development to be apportioned to the northern part of the borough, especially within the LIG.</p> <p>It is important that the strategy for the spatial distribution of development is established prior to engaging with individual site assessments. This can form an initial sieving process and will ensure that the sites assessed are within sustainable locations, and are able to deliver on the regional objectives of the SGP.</p>
<p>Respondent 53 <b>Redrow Homes</b></p>	<p>In terms of the approach to assessing potential sites, those sites submitted to the SHELAA falling within or adjoining Coalville Urban Area, Key Service Centres, the Local Service Centres and Sustainable Villages should be thoroughly assessed.</p> <p>The Options Paper does not provide any clear guidance on the approach to site assessment, although the initial sieve to obtain the most suitable sites is supported. The Council should prepare a paper outlining in further detail the approach it will take to the assessment of sites and provide further opportunity for stakeholders to comment on the proposed methodology.</p> <p>It will remain important to provide for growth in the existing sustainable settlements to help meet future housing requirements. As outlined above, the new Local Plan should provide for a portfolio of sites, including strategic sites</p>

	<p>developing beyond the plan period, along with smaller sites in the more sustainable settlements to ensure the housing requirement over the plan period is met.</p>
<p>Respondent 54 <b>William Davis Homes and Jelson</b></p>	<p>It is impossible to tell against what criteria sites will be tested at the first or second stage of consideration.</p> <p>There is no reference to any technical evidence, other than the Sustainability Appraisal. It is unclear whether the Council is intending to update its evidence base to inform site selection, or whether it is going to rely on the evidence which supports the adopted Plan. If it is the latter, then the Council must demonstrate that the existing evidence base remains up-to-date and is suitable to inform decisions about the selection of sites.</p> <p>If the Council's intention is that this should comprise two stages of assessment, then the methodology needs to show:-  a) what criteria will be applied to the first stage of assessment, how sites will be tested against them and how the Council will decide which sites will 'pass' the first stage of assessment and which will be discounted without proceeding to stage 2;  b) the criteria to be applied at the second stage of assessment, how sites will be tested against them (for example, will there be an element of scoring, and if so, will those scores be weighted in any way), and how the Council will use the outcomes of that assessment to inform its decisions on site selection; and  c) what evidence base will be relied upon, and how that will be factored into the decision-making on the allocation of sites. It is essential that sites are tested against an up-to-date review of constraints. For example, it remains the case that some Local Plan designations, such as the Green Wedge and Area of Separation, have not been robustly reviewed. This must be done before the application of any site selection criteria to ensure the most sustainable approaches are captured and considered.</p>
<p>Respondent 55 <b>Rosconn Group</b></p>	<p>Whilst the general approach might be appropriate, the focus on Strategic matters such as the Leicester International Gateway identified within the SGP should not overlook more localised development needs across the wider District, including growth necessary to aid the sustainability of settlements within the rural areas.</p>
<p>Respondent 57 <b>Hallam Land Management (Appleby Magna)</b></p>	<p>Agreed that the approach to site selection should have regard to both Policy S2 and the SGP in assessing the suitability of sites for development. Approach should also have regard to potential changes to the settlement hierarchy. The spatial strategy will need to be reconsidered in light of this, and the Council should have an understanding of the new spatial strategy before undertaking a review of the approach to site assessment methodology.</p> <p>Consultation confirms a long list of sites will be identified through SHELAA process and the initial assessment undertaken before remaining sites are assessed against a range of criteria and sustainability appraisal. Approach is supported in principle, but there is no clear guidance on the proposed stages of site assessment. Council should outline in further detail approach it will take to site assessment and allow for consultation opportunity.</p>

Respondent 58 <b>Taylor Wimpey</b>	Yes, it follows the cascade methods which are logical and in line with Government guidance.
Respondent 60 <b>Mather Jamie</b>	The local plan review should continue to follow the general approach of the settlement hierarchy as detailed in Policy S2 of the adopted local plan (2017).
Respondent 61 <b>Lesley Birtwistle</b>	Yes.

Question 17 - Are there any specific criteria that we should include when assessing sites?	
Respondent 3 <b>Packington Nook Residents Association</b>	How they meet Council policies and whether there is sufficient infrastructure and sustainable transport available. Bus services in NWL are abysmal in many areas and are inappropriate to support development.  Need to give attention to Neighbourhood Plans, including the recently 'made' plan in Ashby de la Zouch.
Respondent 4 <b>Natural England</b>	As we have mentioned above in Q16.
Respondent 5 <b>Historic England</b>	Criteria should be included to ensure that sites should be assessed in relation to potential harm to heritage assets, both designated and non-designated, and their settings. In particular, proximity should not be used as a gauge of harm or impact.  The use of proximity does not comply with the NPPF – impact upon the setting of assets can occur from a great distance and not simply from sites 'in close proximity' to an asset, dependant on the type of development.
Respondent 8 <b>Coal Authority</b>	NWL has significant coal mining legacy including over 900 mine entries. The Coal Authority provides the LPA with downloadable GIS data in respect of Development Risk and Surface Coal Resource plans. We would therefore expect criteria to be included in any site assessment methodology in order to ensure that full consideration is given to past coal mining legacy and surface coal resource when areas are being put forward for future development allocations.
Respondent 9 <b>Ashby Town Council</b>	The use of the suggested criteria is supported.
Respondent 12 <b>Willesley Environment Protection Association</b>	The provision of public (sustainable) transport within the district continues to reduce substantially, even in the case of the Ashby, classified as a Key Service Centre. It is difficult to predict what will take place in this regard over the plan period but this trend needs to be recognised and taken into account.  Recreational and environmental benefits, including their role in terms in health and wellbeing, should be included.
Respondent 14 <b>Money Hill Consortium</b>	Not beyond the requirements of the NPPF.



Respondent 15 <b>Measham Parish Council</b>	No.
Respondent 16 <b>Christopher Waltho</b>	Particular regard should be had for the retention of settlements as distinct towns and villages with green space in between. This is essential as the requirement for developers to supply/procure public open space appears to have become far less important than it had previously been. Perhaps this is as a result of the NPPF and Planning Policy Guidance where the concept of scheme viability challenges that of sustainability. Current build densities mean that green space is not only essential to ameliorate the effects of urbanisation and the loss of settlement identity, but it is now necessary for recreation more than ever before. The impact of development on highways needs to be realistically assessed too. It is no use citing governmental criteria where, on the ground, new development cannot reasonably be accommodated by existing narrow village lanes with long established parking along the verge.
Respondent 17 <b>Environment Agency</b>	Avoid sites that are at risk of flooding, taking into account the new Climate Change predictions and Updated Modelling of the River Trent.  Encourage sites that re-use brownfield land and/or sites that remediate previously contaminated land.  Encourage sites that can demonstrate a net biodiversity gain and can contribute to the aims of the Water Framework Directive.
Respondent 18 <b>David Bigby</b>	No further sites in Ashby should be included as Ashby has received far more than its fair share of allocations in the current Plan. Furthermore, the slow projected build rate in Ashby where it is predicted that the already allocated sites will not be filled until well beyond the current Plan period, combined with the River Mease restrictions, shows that Ashby is already saturated with available new homes.
Respondent 21 <b>Severn Trent Water</b>	Severn Trent would recommend that the LPA consider including a proximity to surface water outfalls as assessment criteria.  Based on the predominant geology of Leicestershire the viability of infiltration to manage surface water drainage is likely to be limited. In accordance with the drainage hierarchy (Planning Practice Guidance paragraph 80) surface water should be discharged via infiltration or to a watercourse prior to considering a connection into a surface water sewer or as a last option combined sewer.  Where a sustainable outfall such as a watercourse can be utilised the impact on the sewerage infrastructure is greatly reduced, resulting in more sustainable and appropriate development. Severn Trent would therefore like to see development proposals that have access to sustainable surface water outfalls.
Respondent 23 <b>Harworth Group &amp;</b>	See Question 16 above – site assessment will need to have regard to both Policy S2 and the SGP.

<p>Respondent 27 <b>Hallam Land Management (Packington Nook)</b></p>	
<p>Respondent 31 <b>Department for Education</b></p>	<p>NPPF advises that local planning authorities should take a proactive, positive and collaborative approach to ensuring that a sufficient choice of school places is available to meet the needs of communities and that LPAs should give great weight to the need to create, expand or alter schools to widen choice in education (para 94).</p> <p>In light of the above and the Duty to Cooperate on strategic priorities such as community infrastructure DfE encourages close working with local authorities during all stages of planning policy development to help guide the development of new school infrastructure and to meet the predicted demand for primary and secondary school places.</p> <p>In assessing housing allocations, consideration should be given to the likely impact of proposed allocations on local infrastructure, and particularly schools. Large housing allocations that generate a need for a new school should indicate within the local plan how this need will be met, and where appropriate safeguard land for the provision of a new primary, secondary and SEND school(s).</p> <p>The next version of the Local Plan should therefore seek to identify specific sites (informed by robust evidence) which can deliver the school places needed to support growth, based on the latest evidence of identified need and demand in the Infrastructure Delivery Plan. The site allocations and or associated safeguarding policies should also seek to clarify requirements for the delivery of new schools, including when they should be delivered to support housing growth, the minimum site area required, any preferred site characteristics, and any requirements for safeguarding additional land for future expansion of schools where need and demand indicates this might be necessary.</p> <p>The DfE therefore recommend the Council consider highlighting in the next version of the Local Plan that:</p> <ul style="list-style-type: none"> <li>- specific requirements for developer contributions to enlargements to existing schools and the provision of new schools for any particular site will be confirmed at application stage to ensure the latest data on identified need informs delivery; and that</li> <li>- requirements to deliver schools on some sites could change in future if it were demonstrated and agreed that the site had become surplus to requirements, and is therefore no longer required for school use.</li> </ul>
<p>Respondent 32 <b>Packington Parish Council</b></p>	<p>Long term traffic impact on the local roads as consider the County Councils approach to be somewhat lacking.</p> <p>Impact on the infrastructure waste water plants.</p>

<p>Respondent 33  <b>Richborough Estates &amp;</b>  Respondent 34  <b>Robert Botham &amp;</b>  Respondent 35  <b>Mr P Atkinson &amp;</b>  Respondent 36  <b>Mr and Mrs B Sutton</b></p>	<p>Due regard should be had for sites ability to deliver and the timescales in which they can deliver. Realistic approaches to delivery are essential for the Plan to be found sound and effective – especially strategic sites, which can often fail to deliver.</p> <p>The Council should use appropriate build out rates for all sites, to ensure the robustness and integrity of the spatial hierarchy.</p>
<p>Respondent 39  <b>David Wilson Homes (East Midlands)</b></p>	<p>In assessing the sites, it will be important that the methodology is clearly set out and scoring criteria well defined to enable the consistent and robust assessment of sites. This should limit much of the need for ‘planning judgment’ as part of the process, enabling the scoring of sites to be fully transparent.</p> <p>The methodology should enable differences between sites in the same settlement to be recognised – all too often assessment criteria are based too heavily on factors which affect a whole settlement, which does not allow sufficient differentiation between sites to be established.</p> <p>It would be expected that the normal criteria for site assessment will be included within the methodology. This would include factors such as distance to key facilities (shops, schools etc) which would support sustainable movement patterns, access to public transport, impact on heritage assets and physical relationship with a settlement.</p> <p>Consideration should be given not just to allocating more development land on the edge of Coalville but to the supporting role that surrounding settlements in the catchment can provide including Local Service Centres such as Measham.</p> <p>Raise questions about deliverability of sites with permission in Measham as a result of uncertainty regarding HS2. Sites at West of High Street and Land off Ashby Road / Leicester Road unlikely to be achieved within the remainder of the Local Plan period up to the year 2031 and both sites cannot be considered reasonable to contribute towards the Council’s five-year housing land supply position as there is insufficient evidence to suggest the sites are deliverable and that housing completions can begin within five years.</p>
<p>Respondent 41  <b>IM Properties</b></p>	<p>A market perspective on suitability and deliverability of sites is essential.</p>
<p>Respondent 43  <b>JVH Town Planning</b></p>	<p>See Question 16.</p>

Respondent 44 <b>Hanson UK</b>	With reference to the approach identified at question 2 – in addition to criteria relating to environmental, social and economic objectives it would be appropriate to also assess a site’s potential for providing added flexibility for additional housing supply i.e. does the site also offer opportunity for future expansion onto adjoining land should greater housing need be identified.
Respondent 46 <b>Ashby Civic Society</b>	Site assessment needs to consider: Sustainability in its widest form, environmental. Connectivity , infrastructure etc.
Respondent 47 <b>Whitwick Parish Council</b>	Yes. Preservation of existing assets and the non-renewable natural environment is important, crucially the Area of Separation (ie the Green Wedge). The development of Brownfield sites should be a priority before considering any other areas of land for development. Any growth should be carefully managed according to employment opportunities, traffic infrastructure and should not adversely affect the character of an area. Other community factors should have capacity to meet needs that an increased population will require for social, medical, police and welfare needs.
Respondent 49 <b>Quarry Plant and Industry (QPI)</b>	Significant weight should be given to the re-use of high-profile brownfield sites in the District, such as the former Heather brickworks, that will bring about a viable and regenerative use of these sites in the future.
Respondent 50 <b>Mr and Mrs Mansfield</b>	Emphasise the importance of NWLDC’s duty to co-operate with neighbouring authorities. NWLDC should, where necessary, give weight to the sustainability credentials of potential development sites which are not located in ‘preferred development locations’ according to the Settlement Hierarchy at Policy S2, but are located in sustainable locations when consideration of their wider setting (including services and facilities outside of NWL) is taken into account – e.g. Blackfordby. The Local Plan Review should offer favourable weight to potential development sites that can demonstrate they are in such proximity to services and facilities that sustainable modes of transport can be used rather than private car dependence.
Respondent 52 <b>DJ and SC Smith</b>	As part of the assessment, the Council will need to consider whether the sites are suitable, achievable, available and deliverable for development in the context of the NPPG. It is important that the sites identified within the supply are deliverable in the context of the NPPF.  The Council will need to consider how the sites perform in terms of their relationship to existing services and facilities, together with strategic infrastructure. It will also need to consider whether their development would promote a sustainable pattern of development.
Respondent 54 <b>William Davis Homes and Jelson</b>	It is for the Council to propose a site selection methodology that is capable of demonstrating that decisions on the allocations of sites are justified, appropriate and robust. The Council will need to demonstrate that its proposed allocations are deliverable and developable.  Would expect the Council to give consideration to, at least, the following matters (which should not be treated as an exhaustive list):

	<ul style="list-style-type: none"> <li>• the location of the site relative to the settlement hierarchy for the District;</li> <li>• the proximity of the site to jobs, services and other facilities (for example schools, medical facilities etc);</li> <li>• the accessibility of the site to jobs and services by means other than the private car;</li> <li>• the achievability of a safe and suitable access to the site from the public highway;</li> <li>• known constraints (such as trees, flood risk, heritage assets etc) and the extent to which these are capable of being mitigated;</li> <li>• existing designations, and the extent to which an allocation for residential development would conflict with the aims of that designation – for example could an existing Area of Separation, in whole or in part, be released for development without harm being caused to the purposes of the designation or harm being appropriately mitigated; and</li> <li>• whether or not the site is controlled by a developer / housebuilder, and evidence of developer intent.</li> </ul>
<p>Respondent 55 <b>Rosconn Group</b></p>	<p>It is likely that the settlement hierarchy (Policy S2) that underpins the extant Local Plan will continue to provide a restrictive basis for a development strategy to meet future needs in the District beyond 2031. The policy should support development adjacent to Sustainable Villages to help and support the vitality and sustainability of the rural communities subject to criteria. Development which is well related to the settlement and acceptable in other planning terms should be encouraged and promoted where it can contribute positively to the sustainability of a settlement and meet identified needs for both market and affordable housing.</p> <p>The identification of both Ibstock and Heather as sustainable locations for further development would be supported in that light.</p>
<p>Respondent 56 <b>Davidsons Developments (Ibstock)</b></p>	<p>In assessing the sites, it will be important that the methodology is clearly set out and scoring criteria well defined to enable the consistent and robust assessment of sites. This should limit much of the need for ‘planning judgment’ as part of the process, enabling the scoring of sites to be fully transparent.</p> <p>The methodology should enable differences between sites in the same settlement to be recognised – all too often assessment criteria are based too heavily on factors which affect a whole settlement, which does not allow sufficient differentiation between sites to be established.</p> <p>It would be expected that the normal criteria for site assessment will be included within the methodology. This would include factors such as distance to key facilities (shops, schools etc) which would support sustainable movement patterns, access to public transport, impact on heritage assets and physical relationship with a settlement.</p> <p>Very important that due consideration is given to the specific benefits that the development of individual sites can bring – e.g. Blackberry Farm in Ibstock.</p>

	Ibstock is well located to support the role of Coalville as the main centre – it has capacity for further growth.
Respondent 57 <b>Hallam Land Management (Appleby Magna)</b>	See Question 16.
Respondent 60 <b>Mather Jamie</b>	<p>The local planning authority should consider sites which will support the development of other adjacent sites and therefore deliver a comprehensive and sustainable form of development in that locality. This is particularly the case for sites which are within the highest three categories of the settlement hierarchy as outlined in Policy S2 of the adopted local plan (2017), and can therefore accommodate greater levels of development.</p> <p>Consideration should also be given to the redevelopment of sites which provide an opportunity to improve their overall quality and appearance, and reduce landscape and visual impacts from existing development.</p>
Respondent 61 <b>Lesley Birtwistle</b>	<p>Where possible should endeavour to respect the limits to development. Villages are growing at an alarming rate and many of them do not have the facilities to support an increase in population. Shops and post offices are closing – there will be more use of private cars by those living in such locations, not less. Communities are becoming sprawled masses with a decreased sense of community and therefore ironically, an increased likelihood of loneliness and isolation. In addition there is a decreased experience of well-being amongst long-standing residents, as their treasured location becomes a less attractive and intimate place to live.</p> <p>It is right to focus essential house-building on the larger population centres but even in the towns, the infrastructure is inadequate. The rate of growth is not commensurate with an increase in facilities. Schools are overcrowded, shops are of limited range and appeal and other facilities in a town like Ashby-de-la-Zouch have been reduced, not increased. e.g. loss of courts, hospital, stand-alone PO, police-station, distinguished individual shops, movement of major health centre out of town. Coalville has also lost representatives of major shopping chains and is poorly served by retail facilities.</p>
Respondent 62 <b>Lichfield District Council</b>	Consideration on the potential impact on the River Mease Special Area of Conservation should we considered as part of any specific site assessment criteria. It is possible that any consideration could form part of the initial sieve process.

<b>Question 18 - Should we include a specific policy on self and custom build?</b>	
Respondent 3 <b>Packington Nook Residents Association</b>	Yes

Respondent 7 <b>Home Builders Federation</b>	Self and custom build housing should be supported for its potential additional contribution to housing supply.
Respondent 9 <b>Ashby Town Council</b>	A specific policy on self build should be included. This should be strategic and support self build developments.
Respondent 12 <b>Willesley Environment Protection Association</b>	Yes
Respondent 14 <b>Money Hill Consortium</b>	<p>On the basis of NPPF Para 61, it is recommended that a self and custom build policy is included with the revised Local Plan. However, the Money Hill Consortium along with Redrow Homes and Miller Homes believe any specific policies should not be binary and simply apply a self / custom-build percentage to each allocated site which, if remained undeveloped due to a lack of demand, could detrimentally impact the Council's Housing Land Supply. Instead, such a policy should be based upon identified demand, which will be informed by the self / custom-build register (as referenced below).</p> <p>In addition to the above, under section 1 of the Self Build and Custom Housebuilding Act 2015, local authorities are required to keep a register of those seeking to acquire serviced plots in the area for their own self-build and custom house building. They are also subject to duties under sections 2 and 2A of the Act to have regard to this and to give enough suitable development permissions to meet the identified demand. Self and custom-build properties could provide market or affordable housing.</p>
Respondent 15 <b>Measham Parish Council</b>	Yes.
Respondent 18 <b>David Bigby</b>	Yes.
Respondent 19 <b>Ruth Mulvany</b>	Yes there are many robust examples of self build policy in other districts. Authorities similar in scale and demographics and of a similar rural nature as NWLDC usually use the rural exception site rule to accommodate the self build policy easily. 40 self builders is not a lot to accommodate. not all of them may be in a position to build so windfall sites make sense as if they are incorporated into an existing housing site the self builder may not want to live there or may not be able to build within the timescales of the site.
Respondent 21 <b>Severn Trent Water</b>	Severn Trent would envisage that self-build plots would be relatively small in scale and therefore are unlikely to result in significant increase in flow into the sewerage network. As such we have no specific comment to make regarding the questions within this section but would highlight the need to ensure that sustainable surface water outfalls are considered along with the implementation of water efficient fittings to prevent excessive water consumption. Where possible the use of rainwater harvesting and grey water reuse should be considered within the developments.

<p>Respondent 23 <b>Harworth Group &amp;</b> Respondent 27 <b>Hallam Land Management</b> <b>(Packington Nook)</b></p>	<p>Object to a policy that seeks to specify a percentage provision of self-build/custom build housing on larger sites. This policy approach merely serves to change housing delivery from one form of house building to another, without any consequential additional contribution to boosting housing supply. There are also practical issues that should be given careful consideration, including health and safety implications, working hours, length of build programme and therefore associated long-term gaps in the street-scene caused by stalled projects.</p> <p>In order to support self-build/custom build housing in North West Leicestershire, the Council should include a policy that sets out that proposals for self-build/custom build housing will be looked on favourably.</p>
<p>Respondent 24 <b>Gladman Developments</b></p>	<p>Urge the Council to adopt a flexible approach in determining policy requirements relating to housing mix – avoid blanket housing mix requirement. Don't just use housing needs evidence - also use market demand.</p> <p>On-site delivery of self build units should be avoided. Unclear how this would work during construction of a development, or if this would be desirable to self-builders.</p>
<p>Respondent 32 <b>Packington Parish Council</b></p>	<p>Think it should have a specific policy as it seems to come forward as an option to obtain a planning permission where normally it would not be granted. It must be more robust.</p>
<p>Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson &amp;</b> Respondent 36 <b>Mr and Mrs B Sutton</b></p>	<p>Not necessary to include a specific policy on self and custom built. The Plan should be inherently permissive to acceptable self/custom build developments through its policies and application of the spatial hierarchy, without the need for a specific policy.</p>
<p>Respondent 39 <b>David Wilson Homes (East Midlands) &amp;</b> Respondent 56 <b>Davidsons Developments</b> <b>(Ibstock)</b></p>	<p>Consider that there is a need to include a policy on the provision of self/custom build housing as it is important that certainty is provided as to how the identified need noted in the Consultation is to be met.</p> <p>Policy which requires a specific percentage of self/custom build plots on sites over a set threshold (assumed potentially 10 homes given the example of a housing mix policy set out in the Document) is not appropriate – would simply change the tenure of homes what would otherwise be provided as market or affordable housing, and could lead to decrease in housing delivery if plots are not taken up.</p> <p>Policy would also have practical health and safety implications for the main house builder and those looking to build their own home. There would also be implications for CIL contributions, with self/custom build properties being exempt from CIL.</p>



	<p>Note Blaby Local Plan Delivery DPD deletion of policy relating to percentage approach.</p> <p>Any policy will need to be based on the level of need identified by the Council. Figure of 44 dwellings, refined through consideration of secondary data sources, should be the basis of any policy development by the Council, in line with the National Planning Practice Guidance. Regard also needs to be given to the specific locational requirements of those in the register.</p> <p>The preferred approach of the Council should be a flexible policy which facilitates the delivery of individual plots in appropriate locations or the allocation of small sites in locations linked to where self-builders are searching.</p>
Respondent 46 <b>Ashby Civic Society</b>	Yes.
Respondent 47 <b>Whitwick Parish Council</b>	Only if there is demonstrable benefit to having a separate policy.
Respondent 52 <b>DJ and SC Smith</b>	<p>Any such policy should be justified and based on robust evidence, as set out in an up-to-date Strategic Housing Market Assessment.</p> <p>Has concerns regarding the inclusion of such a policy within the review – particularly in relation to delivering large strategic sites. A policy which requires all new developments to make provisions for self-build or custom build units will have significant implications on those sites which are to come forward in line with a masterplan, or that require phasing.</p> <p>Support the Council’s identification of a register which details specific sites that are appropriate for self and custom build homes. It is important that any policy directs self and custom build housing towards these sites to ensure that local need is met, without compromising those large schemes which are required to come forward in line with a masterplan, or be appropriately phased.</p>
Respondent 54 <b>William Davis Homes and Jelson</b>	Supportive of the Plan including a Policy on self and custom build. However, the form of that Policy requires careful consideration so as to maximise the opportunity for self and custom build plots to contribute to the supply of new housing in the District.
Respondent 55 <b>Rosconn Group</b>	Yes.
Respondent 61 <b>Lesley Birtwistle</b>	Yes.

**Question 19 - Which of the options do you prefer and why?**

<p>Respondent 3 <b>Packington Nook Residents Association</b></p>	<p>Support the options to allocate specific land for custom build and to support Neighbourhood plans in identifying sites, as these are likely to offer locations and capacity that self-builders (often already local residents) want and which the community supports.</p> <p>It is council policies which will need to drive the site assessments for self-build.</p> <p>Do not support the Housing Mix and % options as take-up is not assured, which will lead to developments yielding incomplete capacity and putting more pressure on the need for other sites/capacity.</p>
<p>Respondent 7 <b>Home Builders Federation</b></p>	<p>The allocation of sites for self and custom build housing is supported.</p> <p>A proportion of self / custom build serviced plots on larger housing allocations is not supported which only changes housing delivery from one form of house building to another without any consequential additional contribution to boosting housing supply. If serviced plots are not developed by self / custom builders then these undeveloped plots are effectively removed from the HLS unless the Council provides a mechanism by which these plots may be developed by the original non self / custom builder in a timely manner. Before introducing any such policy proposal the Council should consider the practicalities of health &amp; safety, working hours, length of build programme, etc. as well as viability assessing any adverse impacts. There is the loss of Community Infrastructure Levy (CIL) contributions as self / custom build properties are exempt. Any policy requirement for self / custom build serviced plots on larger housing sites should be fully justified and supported by evidence of need. As set out in the National Planning Practice Guidance (NPPG) (ID 2a-021) the Council should fully assess the demand from people wishing to build their own homes by collating data from reliable local information (including the number of validated registrations on the Council’s Self / Custom Build Register). The Council should also analyse the preferences of these entries as often only individual plots in rural locations are sought as opposed to plots on larger housing sites. The Register may not provide the justification for this proposed policy approach.</p>
<p>Respondent 12 <b>Willesley Environment Protection Association</b></p>	<p>The use of a strategic policy is preferred. The example given in the consultation document is supported, with full account taken of policies and specific sites identified as part of Neighbourhood Plans.</p> <p>The Housing Mix policy and Percentage Mix policy options are not supported. Where developers are involved, they are likely to not favour development of these sites, leading to under provision.</p>
<p>Respondent 14 <b>Money Hill Consortium</b></p>	<p>Any self / custom-build policy should respond to the evidence base confirming the need. This should then inform site identification. Those sites identified should be circa. 10 – 30 homes as well as smaller infill locations. These smaller scale sites are considered optimum from a construction management perspective and are not dependant to larger strategic</p>

	allocations. The identification of smaller sites would also accord with Paragraph 64 of the NPPF which requires Local Planning Authorities to provide 10% of the total housing allocation on sites of no more than 1 hectare.
Respondent 15 <b>Measham Parish Council</b>	5
Respondent 18 <b>David Bigby</b>	The Strategic Policy only as it is impractical to make any further detailed provisions
Respondent 19 <b>Ruth Mulvany</b>	Windfall sites makes sense in infill and rural exceptions as there is such limited self build interest in the district.  Logistically there is not the population to support self build plots on bigger housing development sites.  Another alternative is for a number of self builders to build on an agreed site.
Respondent 23 <b>Harworth Group &amp;</b> Respondent 27 <b>Hallam Land Management</b> <b>(Packington Nook)</b>	See Question 18.
Respondent 24 <b>Gladman Developments</b>	Support a more flexible approach to self-build. Consider that the Council should treat proposals for self-build positively, establishing a policy-based approach for windfall developments. The Council should encourage the delivery of community based self-build through Neighbourhood Plans and potentially consider whether there is a need for the allocation of self-build only sites on small sites where proven to be required and deliverable.
Respondent 30 <b>Intro Crowd &amp;</b> Respondent 37 <b>Western Range &amp;</b> Respondent 40 <b>Davidsons Developments &amp;</b> Respondent 53 <b>Redrow Homes</b>	Policies seeking to specify a percentage provision of self-build/custom build housing on larger sites merely serve to change housing delivery from one form of house building to another, without any consequential additional contribution to boosting housing supply. If self-build/custom build plots are not developed then the Council has effectively caused an unnecessary delay to the delivery of homes.  Following objections to the Blaby Local Plan Part 2 Main Modifications, the Inspector deleted the requirement to provide a proportion of self-build/custom build plots on the proposed large housing allocation. To support self-build/custom build the Council should consider the allocation of specific sites in the Local Plan.  There are also practical issues such as health and safety implications, length of build time, long term gaps in street scene.
Respondent 32 <b>Packington Parish Council</b>	Ten or more dwellings.

<p>Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson &amp;</b> Respondent 36 <b>Mr and Mrs B Sutton</b></p>	<p>Suggested strategic policy considered superfluous and unsound. It is not considered there is sufficient justification to include a policy at all. If such a policy is considered necessary, it should be limited to the Council's confirmation that it intends to support self/custom building within the District and that it will look at avenues to provide support.</p> <p>Housing mix policy is considered to be ineffective and overly vague. Well established that such criteria are largely unworkable on modern housing developments and do not serve to provide additional units. In reality, such requirements may impede development unnecessarily, adding to developer burden without even delivering additional housing units.</p> <p>Fallacy to consider that because there is demand for 44 self-build plots on the register that they would all build their own property, even if suitable land was available.</p> <p>No inherent objection to Council using its own land for self-build plots but it seems that the Council already have concerns with adopting this approach and as such it is not clear whether it can truly be considered practical.</p>
<p>Respondent 39 <b>David Wilson Homes (East Midlands) &amp;</b> Respondent 56 <b>Davidsons Developments (Ibstock)</b></p>	<p>Either the allocation of small sites, restricted to self-build, or encouragement for neighbourhood plans to identify appropriate opportunities.</p>
<p>Respondent 46 <b>Ashby Civic Society</b></p>	<p>Option 1 – a general Policy with few specifics.</p>
<p>Respondent 47 <b>Whitwick Parish Council</b></p>	<p>Cases should be assessed on merit and not on percentage base.</p>
<p>Respondent 52 <b>DJ and SC Smith</b></p>	<p>It is not reasonable to expect all new developments to make provisions for self or custom build housing due to the implications it would have on delivering large scale, strategic developments.</p> <p>Regarding the devolution of powers to neighbourhood plans to identify self and custom plots, has concerns that this could be used as a platform to prejudice the delivery of sites allocated in the development plan.</p> <p>Strongly recommends that the Council continues with its self and custom build housing register. It is important that this register is kept up-to-date with plots of available land that can be delivered for this specific type of residential development.</p>
<p>Respondent 54</p>	<p>Council should make specific allocations for self and custom build development in the Plan.</p>

<p><b>William Davis Homes and Jelson</b></p>	<p>Do not support a policy approach that would result in all proposals for residential development being required to make provision for self and custom build. To do so could risk the delivery of housing where there is no demand for self and custom build on a particular site. In that scenario, plots restricted for self and custom build could be considerably delayed in coming forward, or indeed remain undeveloped. That would mean that a site delivers fewer dwellings than it has the capacity to, which would in turn have very negative implications for housing supply in the District. Such outcomes would not represent an appropriate strategy, and would not be sound.</p> <p>In contrast, the allocation of specific sites for self and custom build will enable the Council to ensure that there is availability of serviced plots to meet any identified, evidenced need. Dwellings that are delivered on such sites would make a contribution to housing supply, without placing the delivery of housing on other sites at risk.</p>
<p>Respondent 55 <b>Rosconn Group</b></p>	<p>The option of allocating land specifically for self and custom build housing in locations where need arises is supported. Generally, self and custom builders seek plots which are on free standing sites that are not part of a larger housing estate.</p>
<p>Respondent 61 <b>Lesley Birtwistle</b></p>	<p>(i) Holding and maintaining a register of individuals and associations of individuals who wish to acquire service plots of land to bring forward self-build and custom house building projects;</p> <p>(ii) Encouraging the inclusion of policies or the identification of specific sites for self-build and custom house building projects as part of Neighbourhood Plans;</p> <p>(iii) Working with communities to further understand their requirements and encouraging them to develop their own proposals.</p> <p>(i) to (iii) because it is a trend to be encouraged. It helps to build communities rather than increase hostility and division, if plans for such house-building are generally accepted by residents and included in an agreed future vision for the locality. Also such houses, built to an individual spec. can add to the variety of the housing provision and be more tailored to individual and community needs and also more visually attractive. If they are built on a huge estate, their individuality is "lost".</p> <p>(iv) Allocating land at XX for self and custom build housebuilding to address identified local requirements for self and custom-build homes as detailed in the North West Leicestershire self and custom build register - because this would allow for small developments which would not necessarily be attractive to a large builder and would encourage those who wish to go down this route.</p>

Question 20 - If a percentage approach is supported, what threshold and percentage would you apply and why?	
Respondent 3 <b>Packington Nook Residents Association</b>	We do not support this option for the reasons given
Respondent 7 <b>Home Builders Federation</b>	This approach is not supported by the HBF (see answer to Question 19 above).
Respondent 12 <b>Willesley Environment Protection Association</b>	As stated in the response question 19, this approach is not supported for the reason given.
Respondent 14 <b>Money Hill Consortium</b>	The Money Hill Consortium along with Redrow Homes and Miller Homes believe a “percentage approach” is a blunt policy tool. Instead, specific sites should be identified where there is a need for self / custom-build housing. Such a policy could support community-led housing options. Also, NWLDC could consider policies similar to that of Plymouth and Dudley with regard to council-owned land in the delivery of self / custom-build housing.
Respondent 32 <b>Packington Parish Council</b>	1 or 2% on the above – don’t think that the take up will be significant.
Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson &amp;</b> Respondent 36 <b>Mr and Mrs B Sutton</b>	Do not consider it reasonable or desirable to try and deliver serviced plots as part of larger developments. The Local Plan and its policies should enable the delivery of custom build housing through permissive, positive policies.
Respondent 39 <b>David Wilson Homes (East Midlands) &amp;</b> Respondent 56 <b>Davidsons Developments (Ibstock)</b>	A percentage approach is not supported but if a target were to be introduced, it would need to be based on the assessed level of need across the District (currently 44 plots). This is such a small percentage of the overall requirement that, notwithstanding practical issues with delivery and locational matters, a percentage policy is impractical and unworkable.
Respondent 46 <b>Ashby Civic Society</b>	Do not support a percentage approach

Respondent 52 <b>DJ and SC Smith</b>	Has concerns with proposing a blanket policy which requires all sites of a certain size to make provisions for self and custom build housing. A more appropriate approach for the Council to meet its need for self and custom build housing is to continue with a register that identifies suitable and available plots of land for such development.  Overall, do not support the threshold and percentage approach to ensure the delivery of self and custom build housing due to the impact it could have on the delivery or large strategic developments.
Respondent 54 <b>William Davis Homes and Jelson</b>	Do not support a Policy that requires a percentage of self and custom build plots to be delivered as part of proposals for residential development above a given size.
Respondent 61 <b>Lesley Birtwistle</b>	Estates of 25 houses or more – sliding scale starting at 3%.

Question 21 - Should the Council allocate sites for self and custom housebuilding properties only and/or seek to identify opportunities for self and custom plots as part of allocated housing sites?	
Respondent 3 <b>Packington Nook Residents Association</b>	Any sites offered for self-build must be assured for completion, so as to contribute in a meaningful way to housing volumes.
Respondent 7 <b>Home Builders Federation</b>	See answer to Question 19 above.
Respondent 12 <b>Willesley Environment Protection Association</b>	Yes.
Respondent 14 <b>Money Hill Consortium</b>	See Question 20.
Respondent 15 <b>Measham Parish Council</b>	No - Council should use own land to build social housing
Respondent 18 <b>David Bigby</b>	No.
Respondent 19 <b>Ruth Mulvany</b>	Not on large sites as feel it will be a waste of time as a self builder generally wants to self build so that they can live in an individual house and not on an estate. A small site of perhaps up to 10 plots may be viable but again many self builders may not want to live in a particular area that is offered as plot.

	it is important to listen to the needs of the self builder as the self builder often builds dwellings that have technologies that are best practice for the future due to their passion for the dwelling. it is important not to see the self builder as a box to be ticked and just offer some plots on a larger development for the ease of the local authority.
Respondent 23 <b>Harworth Group &amp;</b> Respondent 27 <b>Hallam Land Management (Packington Nook)</b>	See Question 18.
Respondent 32 <b>Packington Parish Council</b>	The council should allocate housing sites as part of an allocated site.
Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson &amp;</b> Respondent 36 <b>Mr and Mrs B Sutton</b>	The Local Plan and its policies should enable the delivery of custom build housing through permissive, positive policies. If allocations are to be made for self/custom build sites, then they should only be made with the explicit agreement of the landowner and mechanisms should be included to release such sites if such delivery regimes are shown to be ineffective.
Respondent 39 <b>David Wilson Homes (East Midlands) &amp;</b> Respondent 56 <b>Davidsons Developments (Ibstock)</b>	See Question 18. The allocation of sites of an appropriate scale in locations where self-builders are actively looking for plots, would be the preferable approach. This would help support the delivery of housing across the district and not interfere with the delivery on major sites.
Respondent 46 <b>Ashby Civic Society</b>	Yes.
Respondent 52 <b>DJ and SC Smith</b>	Supports the identification of sites that are specific for self and custom build housing by way of a register, which is kept up-to-date with suitable and available land.  Strongly disagrees with the identification of land for self and custom build housing plots as part of sites allocated in the development plan. As set out, this proposed approach could have implications on sites which are required to come forward in line with a masterplan or, that need phasing. Furthermore, it could also have implications on the viability of sites and these assessments of land values.



Respondent 54 <b>William Davis Homes and Jelson</b>	Council should allocate specific sites for self and custom build, and should not impose requirements for allocated housing sites to include a specific proportion of self and custom build plots.
Respondent 55 <b>Rosconn Group</b>	The option of allocating land specifically for self and custom build housing in locations where need arises is supported.
Respondent 61 <b>Lesley Birtwistle</b>	Survey those on the register to ascertain what percentage would welcome an opportunity for a plot on an allocated housing site. If a clear majority than do both.

<b>Question 22 - Should the occupation of these 'allocated' plots be restricted, in the first instance, to those on the Council's self and custom build register?</b>	
Respondent 3 <b>Packington Nook Residents Association</b>	No, the policy should meet demand and other applications considered on merit, such as building innovation, impact on the environment, carbon impact and sustainability.
Respondent 7 <b>Home Builders Federation</b>	The occupation of self / custom build plots should not be restricted.
Respondent 12 <b>Willesley Environment Protection Association</b>	No.
Respondent 15 <b>Measham Parish Council</b>	Yes.
Respondent 19 <b>Ruth Mulvany</b>	It makes sense that they are as long as the council liaises with mortgage lenders to ensure successful finance of the sites.
Respondent 32 <b>Packington Parish Council</b>	Yes it should be restricted providing the Council are able to do this.
Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson &amp;</b> Respondent 36 <b>Mr and Mrs B Sutton</b>	It would seem sensible, but no specific comments either way.

Respondent 39 <b>David Wilson Homes (East Midlands) &amp;</b> Respondent 56 <b>Davidsons Developments (Ibstock)</b>	It is considered that any policy to deliver self-build plots should ensure plots are initially reserved for those on the register. The need to be planned for is established primarily through the register, therefore the plots identified should initially at least be reserved to satisfy this need.  To open up the availability of plots to a wide audience may lead to them being taken up by 'outsiders' which would not fulfil the purpose of identifying the plots in the first place.
Respondent 46 <b>Ashby Civic Society</b>	Yes.
Respondent 47 <b>Whitwick Parish Council</b>	Yes.
Respondent 55 <b>Rosconn Group</b>	The occupation of self/custom build plots should not be restricted to only those on the register and should be available to anyone who intends to build a self or custom-built home.
Respondent 61 <b>Lesley Birtwistle</b>	Yes, as long as the existence of the register is well-promoted.

<b>Question 23 – Are there any other options we should consider?</b>	
Respondent 7 <b>Home Builders Federation</b>	The Council should also consider a policy approach of rural exception sites for self and custom build housing.
Respondent 14 <b>Money Hill Consortium</b>	<ul style="list-style-type: none"> <li>▪ Disposal of Council-owned land</li> <li>▪ The role of Neighbourhood Plans in identifying specific self / custom-build sites</li> <li>▪ Approaches to self / custom-build affordable housing</li> </ul>
Respondent 15 <b>Measham Parish Council</b>	Promote the possibility of building own homes through public workshops
Respondent 18 <b>David Bigby</b>	No.
Respondent 19 <b>Ruth Mulvany</b>	Windfall sites brought forward by the self builders throughout in the district and with support of the planning department from the beginning of pre app advise etc to ensure scale and design of development makes the most sense due to the small scale of the self build register.
Respondent 23 <b>Harworth Group &amp;</b> Respondent 27	See Question 18.

<b>Hallam Land Management (Packington Nook)</b>	
Respondent 32 <b>Packington Parish Council</b>	Perhaps as an exception site in a small village for a local.
Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson &amp;</b> Respondent 36 <b>Mr and Mrs B Sutton</b>	Local Plan, in line with the revised NPPF should enable the delivery of appropriate self-build plots without overly prescriptive policies.
Respondent 46 <b>Ashby Civic Society</b>	Positively support applications received for self build which meet planning criteria.
Respondent 61 <b>Lesley Birtwistle</b>	Preference to eco-friendly buildings.

<b>Question 24 - Should we include a policy (or policies) to address health and wellbeing issues as part of new development?</b>	
Respondent 3 <b>Packington Nook Residents Association</b>	Yes
Respondent 4 <b>Natural England</b>	Would welcome inclusion of policy wording which linked health and well-being to the provision and improvement of green infrastructure either as a new separate policy or linked with other relevant policies. This would follow the guidance within the NPPF (paragraph 91c) which recognises importance of provision of safe and accessible green infrastructure in enabling and supporting healthy lifestyles.
Respondent 5 <b>Historic England</b>	Heritage can play an important role in wellbeing and healthy communities, such as how people feel about 'their place' and the visual impact of areas, whether urban or rural, linking holistically to policies such as shop fronts, advertisements etc. It would be helpful to include reference to heritage within a policy (or policies) to address health and wellbeing issues if taken forward.
Respondent 12 <b>Willesley Environment Protection Association</b>	Yes.

<p>Respondent 14 <b>Money Hill Consortium</b></p>	<p>The example policy, as drafted, duplicates many components of existing adopted policies.</p> <p>The current Local Plan places “health and well-being” as being a core policy objective over the period 2011 – 2031. This is supported by thematic policies such as Policy IF3 : Open Space, Sport and Recreation Facilities and Policy En1 : Nature Conservation. As such, the Money Hill Consortium along with Redrow Homes and Miller Homes believe that the Local Plan attaches considerable importance to health and well-being issues.</p> <p>If NWLDC have an aspiration to go beyond the requirements of the existing Local Plan this can be achieved through the pre-application process as likely to vary on a site-by-site basis. Early engagement with NHS England and other relevant stakeholders will provide greater impact than a broad policy. Similarly, in the event that a Health Impact Assessment be required this can be scoped as part of the pre-application process or EIA scoping opinion.</p>
<p>Respondent 15 <b>Measham Parish Council</b></p>	<p>Yes.</p>
<p>Respondent 18 <b>David Bigby</b></p>	<p>Yes.</p>
<p>Respondent 19 <b>Ruth Mulvany</b></p>	<p>Yes and ensuring sites have access to cycle lanes and footpaths</p>
<p>Respondent 20 <b>Canal and River Trust</b></p>	<p>The Trust would support the inclusion of a policy to address health and wellbeing within the Local Plan to ensure that it is considered in relation to new development proposals.</p> <p>The Trust believes that spending time by water makes people happier and healthier, and we work with communities across England and Wales to transform their local canal or river, creating places and spaces that can be used by everyone. The Trust measures how we make a difference to peoples’ lives with a yearly Outcomes Report which looks at how we improve health, wellbeing and happiness, protect the environment, enhance learning and encourage prosperous local communities. The development of a new riverside walk can help contribute towards achieving these aims. The Trust’s first Outcomes Report can be found on the Trust’s website via this link: <a href="https://canalrivertrust.org.uk/refresh/media/thumbnail/33802-canal-and-river-trust-outcomes-report-waterways-and-wellbeing-full-report.pdf">https://canalrivertrust.org.uk/refresh/media/thumbnail/33802-canal-and-river-trust-outcomes-report-waterways-and-wellbeing-full-report.pdf</a></p> <p>Canal towpaths offer options for walking and cycling, whether as a sustainable, traffic-free route that can link with the wider network of paths and cycleways within the District to help access facilities, schools or work, or simply as an accessible and free to use recreational route. Promoting and facilitating access to and use of towpaths can help to encourage more active and healthier lifestyles. Waterway corridors are valuable multi-functional resources that provide linear green/blue infrastructure corridors, wildlife habitats and recreational opportunities such as canoeing, as well as walking/cycling routes.</p>

	<p>The Trust considers that any policy within the Local Plan that seeks to address and/or support the health and wellbeing of the District's residents should include consideration of the role that the Trust's waterways can play, and how new development near to these waterways can help to facilitate better access to and greater use of them by local communities.</p>
<p>Respondent 26 <b>National Forest Company</b></p>	<p>Yes, new development should be expected to demonstrate how it has been designed to improve health and wellbeing. While this may be addressed in part in the current plan, a specific policy will ensure the issue is given further consideration.</p> <p>Any policy should seek to address health and wellbeing issues through the provision of green space and the promotion of active design principles.</p>
<p>Respondent 32 <b>Packington Parish Council</b></p>	<p>The Council should include a policy or policies to address health and well being issues as part of a new development.</p>
<p>Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson &amp;</b> Respondent 36 <b>Mr and Mrs B Sutton</b></p>	<p>Such a policy should only be included if there is an evidenced need for such a policy and that it would have demonstrable impacts on the health of residents. A policy should not be adopted without evidence of need or that it will have a material impact on the health of residents. Any such policy should be proportionate and not place undue requirements on new developments.</p>
<p>Respondent 39 <b>David Wilson Homes (East Midlands)</b></p>	<p>Building health and wellbeing into plan making decisions is one of the simplest ways of improving health and wellbeing.</p> <p>Do not consider it appropriate to include a specific policy in relation to health and wellbeing which requires planning applications to be supported by the submission of a Health Impact Assessment. Health impacts can be adequately assessed through the Plan making process, considering the most appropriate location of development to aid healthy lifestyles and access to appropriate health and well-being services.</p> <p>Design policies can also build in adequate provision to ensure the design and layout of development gives due consideration to health issues.</p> <p>Would also draw the Council's attention to the Planning Practice Guidance which sets out the need for such a policy to be evidence based. Such a policy should not be considered without there being a robust evidence base for doing so.</p>
<p>Respondent 41 <b>IM Properties</b></p>	<p>Yes with the economic dimension of wellbeing recognised.</p>

Respondent 46 <b>Ashby Civic Society</b>	Yes.
Respondent 52 <b>DJ and SC Smith</b>	<p>The NPPF sets out that planning policy should seek to achieve healthy, inclusive and safe communities. Acknowledge that new development is required to have a positive impact on the health and wellbeing of the surrounding environs. In this regard, supports the inclusion of a policy which is relative to health and wellbeing.</p> <p>Notwithstanding, it is important that any such policy is appropriately worded and that a clear strategy, or guidance is provided as to how new developments are expected to contribute towards health and wellbeing, and in what capacity. It is important that any such requirement to address health and wellbeing need is justified, based on robust and up-to-date evidence. Indeed, any requirement would need to meet the tests set out in the NPPF and be:</p> <ol style="list-style-type: none"> <li>1. Necessary to make the development acceptable in planning terms;</li> <li>2. Directly related to the development;</li> <li>3. Fairly and reasonably related in scale and kind to the development.</li> </ol>
Respondent 56 <b>Davidsons Developments (Ibstock)</b>	<p>Building health and wellbeing into plan making decisions is one of the simplest ways of improving health and wellbeing.</p> <p>Identifying sites which are well related, and linked, to existing leisure opportunities should be a key consideration for selecting sites – e.g. Blackberry Farm which has the potential to link directly to the Sence Valley Park, which provides significant opportunities for physical activity which is important for health and wellbeing.</p> <p>Do not believe it necessary to include Health Impact Assessments as part of applications for developments over a certain size. Health impacts can be adequately assessed through the Plan making process, considering the most appropriate location of development to aid healthy lifestyles and access to appropriate health and well-being services.</p> <p>Design policies can also build in adequate provision to ensure the design and layout of development gives due consideration to health issues.</p> <p>Would also draw the Council’s attention to the Planning Practice Guidance which sets out the need for such a policy to be evidence based. Such a policy should not be considered without there being a robust evidence base for doing so.</p>
Respondent 58 <b>Taylor Wimpey</b>	This should form part of any design proposal and seek to enhance health and wellbeing through placemaking. Enhanced design policies would help to address these objectives which in any event are advocated through NPPF and NPPG.
Respondent 61 <b>Lesley Birtwistle</b>	Yes.

Question 25 – Should we have a strategic policy which would support the health and wellbeing of North West Leicestershire’s residents?	
Respondent 3 <b>Packington Nook Residents Association</b>	Yes
Respondent 4 <b>Natural England</b>	<p>It would be helpful to include a strategic policy on this issue as it links with other strategic issues within the plan such as Green Infrastructure, sustainable travel and community facilities.</p> <p>Whilst generally welcoming draft policy on this topic suggest that it should include greater emphasis on the importance of the Green Infrastructure network to health &amp; wellbeing. In particular it should also include the benefits to health (both physical and mental) of improving access to nature; linking developments to public rights of way and increasing the quality of green spaces.</p>
Respondent 5 <b>Historic England</b>	See Question 24
Respondent 12 <b>Willesley Environment Protection Association</b>	<p>Yes. This policy should recognise and make clear reference not only to the value of designated local green spaces, and formal sports facilities, play and recreation opportunities, but also to the areas of much valued natural and historic rural environment within the Countryside outside Limits to Development, for their recreational and amenity value, tranquillity and biodiversity, supporting the health, social and cultural well-being of the local and wider community. encourage tourism, bringing economic benefits to the area.</p> <p>For example, WEPA has identified such an area of approximately 340 hectares in the Willesley area of the Ashby parish, directly adjacent to the urban edge of Ashby but outside the current Limits to Development that fulfils these objectives. This contains within it a number of individual sites which are considered to satisfy the requirements for designation as open green spaces, used for recreational purposes, and amounting to 55% of the total area. The remainder of the overall area also contributing to the same values and benefits. This by way of the public footpaths and bridleways that cross the area and provide easily accessible routes for walking and cycling from the town and other nearby settlements to facilities such as Hicks Lodge, Shellbrook Wood and Willesley Wood. The area also includes excellent facilities for golf, fishing, forest schools’ activities, and outdoor scouting activities. WEPA has been successful in helping to achieve the refusal of Planning Consent of two developments within this area on the basis that they would be contrary to those values and benefits or the area. There are other locations within the Countryside in the District that are equally valuable for the above reasons and benefits, such as areas within the Charnwood Forest, and warrant protection against developments that would be contrary to them.</p>

	The Local Plan and Neighbourhood Plans should specifically preclude certain uses as listed (a) to (s) within Policy S3 – Countryside that would be difficult or impossible to mitigate the effects of such development uses that would be contrary to the values and benefits of these areas. It is suggested that such uses, including the following should be precluded: (j) Sites for Gypsies and Travellers and Travelling Showpeople in accordance with Policy H7; (o) Renewable energy; (particularly in the form of solar farms).
Respondent 14 <b>Money Hill Consortium</b>	See Question 24.
Respondent 15 <b>Measham Parish Council</b>	Yes.
Respondent 18 <b>David Bigby</b>	Yes.
Respondent 20 <b>Canal and River Trust</b>	See Question 24.
Respondent 26 <b>National Forest Company</b>	Yes, while many existing policies touch on this a cross cutting policy to refer back to would increase the weight to be applied to this issue in the decision making process.
Respondent 32 <b>Packington Parish Council</b>	It should be enshrined in the strategic policy for the residents of the district.
Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson &amp;</b> Respondent 36 <b>Mr and Mrs B Sutton</b>	A fundamental principal of both planning and place making is about helping to deliver health and well-being, albeit this is best served by delivering well designed sustainable development.
Respondent 41 <b>IM Properties</b>	Yes with the economic dimension of wellbeing recognised.
Respondent 46 <b>Ashby Civic Society</b>	Yes.
Respondent 58 <b>Taylor Wimpey</b>	The effectiveness of a policy could be difficult to quantify, however an overall strategic objective for supporting local health and wellbeing of local residents through various initiatives, allows flexibility to trial different measures that can be monitored over time to identify the impact. These could be delivered through a S106 package associated with any local development scheme.



Respondent 61 <b>Lesley Birtwistle</b>	Yes.
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**Question 26 – Do you support the use of a Health Impact Assessment Screening Statement to demonstrate the potential impact of a proposal, and to identify whether a more in depth Health Impact Assessment is required?**

Respondent 3 <b>Packington Nook Residents Association</b>	Support the suggested policies. Examples of this would be analogous to the tests currently made in respect of sustainability. Developments located within sensible and safe walking or cycling distances of amenities and services are much more preferably to those which put too much emphasis on using cars. This can be aided by the provision of further footpaths and segregated cycle routes where possible.
Respondent 7 <b>Home Builders Federation</b>	The use of a HIA Screening Statement should demonstrate the potential impact of a development proposal and identify if a full HIA is required.
Respondent 12 <b>Willesley Environment Protection Association</b>	Yes.
Respondent 14 <b>Money Hill Consortium</b>	See Question 24.
Respondent 15 <b>Measham Parish Council</b>	Yes.
Respondent 18 <b>David Bigby</b>	Yes.
Respondent 26 <b>National Forest Company</b>	It would need to be demonstrated that this was necessary over and above a policy that sought for health and wellbeing to be addressed. If required it should only be for the largest proposals to be screened.
Respondent 32 <b>Packington Parish Council</b>	Support the use of a health Impact Assessment screening statement to demonstrate the potential impact of a proposal and to identify whether a more in depth health assessment is required.
Respondent 33 <b>Richborough Estates &amp;</b> Respondent 34 <b>Robert Botham &amp;</b> Respondent 35 <b>Mr P Atkinson &amp;</b> Respondent 36 <b>Mr and Mrs B Sutton</b>	Such a policy would be more proportionate than requiring all development to undertake an HIA. The mechanisms of any policy would require consideration to ensure it does not unduly impede development delivery.

Respondent 46 <b>Ashby Civic Society</b>	Yes.
Respondent 53 <b>Redrow Homes</b>	It is considered that a separate policy requiring developments of a certain size to be supported by a Health Impact Assessment is not necessary. If the Health Impact Assessment is an integral part of the Strategic Environmental Assessment, health and wellbeing factors will be embedded in the policies contained within the plan. If development falls outside of the parameters set by the policies within the plan and has significant adverse impacts (defined by a screening process) then a Health Impact Assessment should be required. This provides a more effective approach to providing healthy communities.
Respondent 54 <b>William Davis Homes and Jelson</b>	Support the use of a 'screening process' to determine whether a full HIA would be required in support of a planning application.
Respondent 58 <b>Taylor Wimpey</b>	No, it is not the place of the Local Planning Authority to identify whether or not a development proposal is 'healthy' or not. The validity of a reason for refusal on this basis would also be extremely difficult to quantify and support.
Respondent 61 <b>Lesley Birtwistle</b>	Yes.

Question 27 - If we required a Health Impact Assessment what threshold should be used above which a Health Impact Assessment would be required?	
Respondent 3 <b>Packington Nook Residents Association</b>	20 houses
Respondent 12 <b>Willesley Environment Protection Association</b>	20 dwellings would probably be an appropriate threshold.
Respondent 14 <b>Money Hill Consortium</b>	Should be determined on a case-by-case basis as part of the pre-application process. Paragraph 44 of the NPPF encourages Local Planning Authorities to publish a list of the information required to support a planning application. This information should be reviewed at least every two years.
Respondent 15 <b>Measham Parish Council</b>	25 Properties
Respondent 18 <b>David Bigby</b>	50 or more dwellings, out of town retail and all take-away outlets
Respondent 32 <b>Packington Parish Council</b>	Use of the Council's Supplementary Planning Document.

Respondent 46 <b>Ashby Civic Society</b>	50 houses and above.
Respondent 61 <b>Lesley Birtwistle</b>	100 or more houses.

**Question 28 - Would you support the inclusion of a policy which would restrict further take away uses within a specific distance of the boundary of a school?**

Respondent 3 <b>Packington Nook Residents Association</b>	Yes but there is an onus on schools to provide attractive, nourishing meals which are served quickly and at reasonable cost. The use of take-away outlets by school pupils often reflects that this is not the case and many schools now adopting short lunchtimes are unable to cater adequately for pupils.
Respondent 12 <b>Willesley Environment Protection Association</b>	Yes.
Respondent 15 <b>Measham Parish Council</b>	Yes.
Respondent 18 <b>David Bigby</b>	Yes.
Respondent 19 <b>Ruth Mulvany</b>	No, education about food is more important than restricting the sale of it.
Respondent 32 <b>Packington Parish Council</b>	Yes - will support such a policy.
Respondent 46 <b>Ashby Civic Society</b>	Yes.
Respondent 58 <b>Taylor Wimpey</b>	No, market forces should be left to control whether or not there is a need for this type of use. In line with comments above, it is inappropriate for the Local Planning Authority to dictate on this matter.
Respondent 61 <b>Lesley Birtwistle</b>	No. Takes away personal choice.

**Question 29 - If yes, what evidence do you have to support this approach? What specific distance would you suggest and why?**

Respondent 3 <b>Packington Nook Residents Association</b>	There are a number of studies linking frequent use of takeaway food to obesity, coronary heart disease and type 2 diabetes: "Takeaway meal consumption and risk markers for coronary heart disease, type 2 diabetes and obesity in children aged 9–10 years: a cross-sectional study" Angela Donin et al Archives of Disease in Childhood, British Medical Journal, December 3 2017
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	<p><a href="https://adc.bmj.com/content/archdischild/early/2017/11/18/archdischild-2017-312981.full.pdf">https://adc.bmj.com/content/archdischild/early/2017/11/18/archdischild-2017-312981.full.pdf</a></p> <p>“Ministers urged to ban fast food outlets from opening near schools - Royal College of Paediatrics and Child Health says councils need increased powers to help combat childhood obesity” Report in The Guardian – 23 April 2018  <a href="https://www.theguardian.com/society/2018/apr/23/ministers-urged-to-ban-fast-food-outlets-from-opening-near-schools">https://www.theguardian.com/society/2018/apr/23/ministers-urged-to-ban-fast-food-outlets-from-opening-near-schools</a></p> <p>A specific distance of at least a mile would provide an incentive to ensure that facilities in schools were the obvious first choice.</p>
Respondent 12 <b>Willesley Environment Protection Association</b>	The evidence is that children are in general overweight and that take away food and drinks are a significant factor. A distance of 1 mile minimum is appropriate involving a round walk of 2 miles.
Respondent 15 <b>Measham Parish Council</b>	500 metres. Number of youths seen in fast food outlets during lunch time and after school.
Respondent 18 <b>David Bigby</b>	Children should be encouraged to take school dinners which are nutritionally balanced or bring packed lunches which are also likely to be more nutritionally balanced than takeaways. We have an obesity epidemic affecting young people. The minimum distance should be 500m. This would prevent any further takeaways being established at the eastern end of Market Street Ashby where there is already an excessive concentration and they create a major traffic and pedestrian safety hazard as well as a dietary health hazard for school children.
Respondent 32 <b>Packington Parish Council</b>	Have witnessed the impact that takeaways have in the Ashby town centre and the amount of school students use them. It should be more than walking distance.
Respondent 46 <b>Ashby Civic Society</b>	National statistics show there is a problem with obesity in school pupils. Takeaways should be restricted within 100m of schools

Question 30 - Are you aware of any evidence that demonstrates health issues suffered by residents within the district that would justify a restriction on further take away uses?	
Respondent 3 <b>Packington Nook Residents Association</b>	<p>There are plenty of studies showing that the population is becoming prone to obesity and the associated health effects.</p> <p>There has not been a satisfactory approach to the provision of fast food outlets in the district. In Ashby de la Zouch there are a number of outlets in Market Street well within reach of the secondary schools and which attract strong custom (evidenced by inconsiderate parking) in the early evenings. There is also now an attraction of the McDonalds restaurant and other outlets at Flagstaff Island services, which attracts children who walk from Ashby and have to cross the busy dual carriageway at the A511.</p>

	Planning the right mix of take-away shops, in the right location is surely a fundamental function of the local authority
Respondent 12 <b>Willesley Environment Protection Association</b>	Adult obesity is higher than the national average. There has been a rise in the number of obese children within the age group of 10-11 years.
Respondent 15 <b>Measham Parish Council</b>	National obesity evidence and rise in NWLDC.
Respondent 18 <b>David Bigby</b>	6.8% of the population aged 17 years and over in the West Leicestershire CCG area suffer from diabetes mellitus, as recorded on practice disease registers. This is an increase of 8% over the last five years (see Public Health England website).
Respondent 32 <b>Packington Parish Council</b>	Haven't evidence that have impacted on health but any day of the week it is evident that they are very popular with students.
Respondent 46 <b>Ashby Civic Society</b>	In Ashby children can be seen purchasing takeaways on the way to school, lunchtime and on their way home.
Respondent 58 <b>Taylor Wimpey</b>	No and therefore it would be inappropriate for the Local Planning Authority to be placing restrictions upon development in this manner.