

## Hugglescote & Donington le Heath Neighbourhood Plan

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<b>Respondent 1 : Canal &amp; River Trust</b>	
<b>Part of document</b>	<b>Comments</b>
General	Thank you for consulting the Canal & River Trust on the Hugglescote and Donington le Heath Neighbourhood Plan. The Trust does not own or operate any waterways or associated infrastructure/assets within the Plan area and therefore I can confirm that we have no comments to make on the Plan.

<b>Respondent 2 : Coal Authority</b>	
<b>Part of document</b>	<b>Comments</b>
General	Our records indicate that there are recorded risks from past coal mining activity at surface and shallow depth within the identified area including; mine entries and likely unrecorded coal workings. However, the Neighbourhood Plan does propose to allocate any sites for future development and on this basis we have no specific comments to make.

<b>Respondent 3 : National Grid</b>	
<b>Part of document</b>	<b>Comments</b>
General	<p><b>Proposed development sites crossed by or in close proximity to National Grid Assets</b></p> <p>Following a review of the above document we have identified that one or more proposed development sites have been identified as being crossed or in close proximity to National Grid assets.</p> <p>Details of the sites affecting National Grid assets are provided below.</p> <p style="padding-left: 40px;">Electricity Transmission</p> <p style="padding-left: 40px;">Asset Description</p> <p style="padding-left: 40px;">ZL ROUTE TWR (010 - 108): 400Kv Overhead Transmission Line route: COVENTRY - RATCLIFFE ON SOAR</p> <p>A plan showing details of the site locations and details of National Grid’s assets is attached to this letter. Please note that the plan is illustrative only.</p> <p>National Grid also provides information in relation to its assets at the website below.</p> <ul style="list-style-type: none"> <li>• <a href="http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a></li> </ul> <p>Please see attached information outlining guidance on development close to National Grid infrastructure.</p> <p>Distribution Networks</p> <p>Information regarding the electricity distribution network is available at the website below:</p>

	<p><a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a></p> <p>Information regarding the gas distribution network is available by contacting:</p> <p><a href="mailto:plantprotection@cadentgas.com">plantprotection@cadentgas.com</a></p>
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<b>Respondent 4 : Historic England</b>	
<b>Part of document</b>	<b>Comments</b>
General	<p>The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.</p> <p>If you have not already done so, we would recommend that you speak to the planning and conservation team at your local planning authority together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (<a href="http://www.heritagegateway.org.uk">www.heritagegateway.org.uk</a> &lt;<a href="http://www.heritagegateway.org.uk">http://www.heritagegateway.org.uk</a>&gt;). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.</p> <p>Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:-</p> <p>&lt;<a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a>&gt;</p> <p>You may also find the advice in "Planning for the Environment at the Neighbourhood Level" useful. This has been produced by Historic England, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information. This can be downloaded from:</p>

	<p>&lt;<a href="http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf">http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf</a>&gt;</p> <p>If you envisage including new housing allocations in your plan, we refer you to our published advice available on our website, "Housing Allocations in Local Plans" as this relates equally to neighbourhood planning. This can be found at &lt;<a href="https://content.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans.pdf/">https://content.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans.pdf/</a>&gt;</p>
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<b>Respondent 5 : Sport England</b>	
<b>Part of document</b>	<b>Comments</b>
General	<p>Government planning policy, within the <b>National Planning Policy Framework</b> (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England’s statutory consultee role in <b>protecting playing fields</b> and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document.</p> <p><a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</a></p> <p>Sport England provides guidance on <b>developing planning policy</b> for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded.</p> <p><a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</a></p>



Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of **assessments of need and strategies for indoor and outdoor sports facilities**. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.

Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England's guidance on assessing needs may help with such work.

<http://www.sportengland.org/planningtoolsandguidance>

If **new or improved sports facilities** are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.

<http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/>

Any **new housing** developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social

	<p>infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how <b>any new development</b>, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p> <p>PPG Health and wellbeing section: <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England’s Active Design Guidance: <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p>
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<b>Respondent 6 : Severn Trent</b>	
<b>Part of document</b>	<b>Comments</b>
General	<p>Severn Trent are generally supportive of the principles detailed within the Neighbourhood Plan, We would also like to thank officers for incorporating a number of our comments to the draft plan, we have nothing further to add to our last response.</p> <p>Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.</p> <p>For your information we have set out some general guidelines that may be useful to you.</p> <p><b>Position Statement</b></p> <p>As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.</p> <p><b>Sewage Strategy</b></p> <p>Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will</p>

complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

### **Surface Water and Sewer Flooding**

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

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

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

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

### **Water Quality**

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by

our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

### **Water Supply**

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

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

### **Water Efficiency**

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

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.

- Hand wash basin taps with low flow rates of 4 litres per minute or less.
- Water butts for external use in properties with gardens.

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

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

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

We would also encourage the use of rainwater harvesting on larger developments, either residential or commercial. This helps to reduce the demand on public supply, associated carbon impact of supply and also reduced site run off and sewer flows. Rainwater Harvesting as a development rather than on a property by property basis is more cost efficient and can produce greater benefits.

Both the River Severn River Basin Management Plan (Page 52) and the Humber River Basin Management Plan (page 46) recommend that Local Plan set out policies requiring homes to meet the tighter water efficiency standard of 110 litres per person per day as described in Part G of Schedule 1 to the Building Regulations 2010. As such Severn Trent's recommendation is consistent with wider objectives within our water supply regions.

<b>Respondent 7 : Leicester, Leicestershire &amp; Rutland CCGs</b>	
<b>Part of document</b>	<b>Comments</b>
	<p>The LLR Clinical Commissioning Groups (CCGs) are supportive of the vision set out in your draft plan and would want to work collectively with you to understand in more detail how the local NHS can contribute to its delivery.</p> <p>Many of the themes identified in the plan will impact upon the wider determinants of health and as a result population health outcomes. We would therefore welcome working together to maximise the opportunity for health and wellbeing within the vision outlined in section 4</p> <p>In particular we would welcome:</p> <ul style="list-style-type: none"> <li>• Actions to support the development of community identity; maximising opportunities for residents to come together to create community cohesion and support each other.</li> <li>• Maximise the opportunities and provision of green space and local recreational facilities that actively promote enable residents to access and undertake physical activity with ease (both formal and informal). Consideration for this type of provision should be varied, evidenced based and compatible with local leisure, and open space strategies. Types of provision could range from (but not limited to) built leisure centre facilities, community centres to play areas to structures walking trails, café / social facilities, or semi nature accessible open space.</li> <li>• The actions to create local jobs (Logistics Park) are welcome as this is a large contributor to people’s health and wellbeing. We would like employers to consider how they support the health and wellbeing of their employees.</li> <li>• That the development is designed in such a way to encourage and enhance physical and mental health and wellbeing and demonstrate compatibility with published national guidance from Sport England, Public Health</li> </ul>

	<p>England, NHS, Design Council and others e.g Active Design Guidance, Building for Life 12, Manual for Streets, Spatial Planning for Health</p> <ul style="list-style-type: none"><li>• Ensure that there are a range of options for travel (including active travel) within the development that enables residents to get to and from work and leisure easily.</li><li>• Infrastructure for Active Travel should be actively encouraged with provision for high quality cycling and walking routes within the development, good connectivity to surrounding settlements and ease of access to public transport.</li><li>• Designs that support the reduction in carbon emissions, as this has a direct impact on some resident's health</li></ul> <p>As well as the above generic comments it is important to note that any increase in the number of new residents in any area will have a direct impact upon local NHS services whether that is primary, hospital or community care. The South East Coalville Development Scheme is planned in an area where much of the provision of primary care services is already under high demand and therefore any additional demand from this or other housing developments will require developer contribution to mitigate this.</p>
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<b>Respondent 8 :</b> Leicestershire County Council	
<b>Part of document</b>	<b>Comments</b>
Policy G1	<p><b><i>Policy G1 the limits of development protecting land to the south and west of the village centre:</i></b> Support the intention to direct traffic away from Hugglescote village centre. The SE Coalville development is ideally placed for employment opportunities at East Midlands Airport, Burton, Derby or Birmingham. With so much development taking place in the east of the Parish, infrastructure improvements are needed to manage the increased traffic. Road infrastructure needs to encourage commuters to approach and leave their homes via the A511 rather than cut through the villages of Packington, Ravenstone, Snibston, Donington le Heath and Hugglescote in an attempt to avoid congestion on the major highway.</p> <p>This policy is consistent with other Neighbourhood Plan Policies, which work towards reducing vehicle movements through the village centre include Policy G2b (cycleways and footpaths), Policy T3 (support for the Leicester to Burton Railway line) and Policy E3 (increased home-working) all of which will improve the local environment and tackle climate change.</p>
Policy G2	<p><b><i>Policy G2b and the intention to direct traffic away from Hugglescote village centre:</i></b> Support the intention to direct traffic away from Hugglescote village centre. The SE Coalville development is ideally placed for employment opportunities at East Midlands Airport, Burton, Derby or Birmingham. With so much development taking place in the east of the Parish, infrastructure improvements are needed to manage the increased traffic. Road infrastructure needs to encourage commuters to approach and leave their homes via the A511 rather than cut through the villages of Packington, Ravenstone and Snibston in an attempt to avoid congestion on the major highway.</p>

	<p>This Policy is coherent with Policy G2b (cycleways and footpaths), Policy T3 (support for the Leicester to Burton Railway line) and Policy E3 (increased home-working) all of which work towards reducing vehicle movements through the village centre and improving the local environment.</p> <p><b><i>Policy G3d and the intention that new residential development will be connected with local facilities by adequate and accessible footpaths and cycleways:</i></b> Support the idea of using the old mineral line to achieve the ambitions of Policies G3d. To be consistent with this Policy, Policy T1c needs to be strengthened. The Parish does not just need 'improvements' to pedestrian and cycle routes but also new provision of such routes for new developments.</p>
Policy T1	<p>Policy T1c needs to be strengthened so that it is consistent with Policy G3d. The Parish does not just need 'improvements' to pedestrian and cycle routes. It also needs new provision of active travel routes for new housing and employment areas. Support the idea of using the old LMS line to achieve this ambition. (assume that it is this line, that passes behind Newbridge School, that is being referred to on page 45?)</p>
Policy G3	<p>Policy G3r needs to include a comment on the maximum carry distance from the house to the bin-store (believe NWLDC's is 25m). It should also recommend accessibility for the type of waste vehicles used by NWLDC. Placing bin-stores at end of private cul-de-sacs and drives that are not accessible by large waste collection vehicles does not encourage recycling and can lead to waste materials blowing about the streets.</p>
Policy T3	<p>Agree that reopening of the Leicester to Burton Railway line would be a welcome improvement to local public transport. Pleased to see the Neighbourhood Plan protecting the route. The plan describes Public Transport as 'adequate'. Would ask 'adequate for what and for whom?' The current bus service to Leicester acts as a barely adequate safety net service for those people who cannot drive. It takes 28 minutes to travel from Forest Road, Hugglescote to the Leicester Royal Infirmary. It takes 1hr and 32 minutes by bus. This level of service does not make Hugglescote an attractive place to live for people working in Leicester town centre. Even the most</p>

	<p>determined environmentalist is unlikely to wish to spend ten hours a week sitting on a bus as part of their daily commute if they had access to a car instead.</p> <p>Reopening the Leicester to Burton Railway to passenger transport would make Hugglescote a much more attractive place to live. It would connect Hugglescote with major centres of employment in Leicester, Burton and beyond to Birmingham. It would also connect Hugglescote to the attractions in the National Forest such as Conkers, Moira Furnace and Hicks Lodge.</p>
<p>Policy T2</p>	<p><b><i>Policy T2 to address the loss of off-street parking:</i></b> Fairfield Road and Crescent Road are mostly Victorian houses with no off-street parking provision. There used to be parking available next to The Gate Inn. This area was closed off after planning permission was given for housing. There used to be off-street parking on Fairfield Road in the form of garages until planning permission was given to build housing on the site.</p> <p>Residents who depended on these garages asked for the plans to include off-street parking available to residents. Since gaining planning permission the owner has excluded the tenants. The site now sits behind Heras fencing, the garages empty. The vehicles that used to occupy those garages have to be parked somewhere and that somewhere often ends up with residents in Garfield Road struggle to get out of their private drives.</p>
<p>Page 10</p>	<p>Typographical error - George and Robert Stephenson are spelt with a 'ph'.</p>
	<p><b>Highways</b></p> <p>The County Council recognises that residents may have concerns about traffic conditions in their local area, which they feel may be exacerbated by increased traffic due to population, economic and development growth.</p> <p>Like very many local authorities, the County Council's budgets are under severe pressure. It must therefore prioritise where it focuses its reducing resources and increasingly limited funds. In practice, this means that the</p>

County Highway Authority (CHA), in general, prioritises its resources on measures that deliver the greatest benefit to Leicestershire’s residents, businesses and road users in terms of road safety, network management and maintenance. Given this, it is likely that highway measures associated with any new development would need to be fully funded from third party funding, such as via Section 278 or 106 (S106) developer contributions. I should emphasise that the CHA is generally no longer in a position to accept any financial risk relating to/make good any possible shortfall in developer funding.

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

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

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

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

	<p>problems or in connection with a development proposal), their implementation would be subject to available resources, the availability of full funding and the satisfactory completion of all necessary Statutory Procedures.</p>
	<p><b>Flood Risk Management</b></p> <p>The County Council are fully aware of flooding that has occurred within Leicestershire and its impact on residential properties resulting in concerns relating to new developments. LCC in our role as the Lead Local Flood Authority (LLFA) undertake investigations into flooding, review consent applications to undertake works on ordinary watercourses and carry out enforcement where lack of maintenance or unconsented works has resulted in a flood risk. In April 2015 the LLFA also became a statutory consultee on major planning applications in relation to surface water drainage and have a duty to review planning applications to ensure that the onsite drainage systems are designed in accordance with current legislation and guidance. The LLFA also ensures that flood risk to the site is accounted for when designing a drainage solution.</p> <p>The LLFA is not able to:</p> <ul style="list-style-type: none"> <li>• Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation.</li> <li>• Use existing flood risk to adjacent land to prevent development.</li> <li>• Require development to resolve existing flood risk.</li> </ul> <p>When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points:</p> <ul style="list-style-type: none"> <li>• Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)).</li> <li>• Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map).</li> </ul>

- Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding.
- How potential SuDS features may be incorporated into the development to enhance the local amenity, water quality and biodiversity of the site as well as manage surface water runoff.
- Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk.

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

Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing watercourses and land drainage (including watercourses that form the site boundary) are retained as open features along their original flow path and are retained in public open space to ensure that access for maintenance can be achieved. This should also be considered when looking at housing densities within the plan to ensure that these features can be retained.

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

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

	<p>Flood risk mapping is readily available for public use at the links below. The LLFA also holds information relating to historic flooding within Leicestershire that can be used to inform development proposals.</p> <p>Risk of flooding from surface water map: <a href="https://flood-warning-information.service.gov.uk/long-term-flood-risk/map">https://flood-warning-information.service.gov.uk/long-term-flood-risk/map</a></p> <p>Flood map for planning (rivers and sea): <a href="https://flood-map-for-planning.service.gov.uk/">https://flood-map-for-planning.service.gov.uk/</a></p>
<p>Page 19</p>	<p><b>Planning</b></p> <p>On Page 19, it would be helpful to make specific reference to the Leicester and Leicestershire Strategic Growth Plan, rather than refer to it as a 'non-statutory growth plan for Leicester and Leicestershire'. The Strategic Growth Plan is the overarching plan that sets out the aspirations for delivering growth in Leicester and Leicestershire up to 2050. The Strategic Growth Plan has been developed by a partnership made up of Leicester City and Leicestershire County councils, the seven local borough and district authorities (including North West Leicestershire District Council) and the Leicester and Leicestershire Enterprise Partnership (LLEP).</p>
	<p><b>Developer Contributions</b></p> <p>If there is no specific policy on Section 106 developer contributions/planning obligations within the draft Neighbourhood Plan, it would be prudent to consider the inclusion of a developer contributions/planning obligations policy, along similar lines to those shown for example in the Adopted North Kilworth NP and the Adopted Great Glen NP albeit adapted to the circumstances of your community. This would in general be consistent with the relevant District Council's local plan or its policy on planning obligations in order to mitigate the impacts of new development and enable appropriate local infrastructure and service provision in accordance with the relevant legislation and regulations, where applicable.</p> <p>North Kilworth Adopted Plan (Leicestershirecommunitites.co.uk)</p>

	Great Glen Adopted Plan ( <a href="http://Leicestershirecommunities.co.uk">Leicestershirecommunities.co.uk</a> )
	<p><b>Minerals &amp; Waste Planning</b></p> <p>The County Council is the Minerals and Waste Planning Authority; this means the council prepares the planning policy for minerals and waste development and also makes decisions on mineral and waste development. Although neighbourhood plans cannot include policies that cover minerals and waste development, it may be the case that your neighbourhood contains an existing or planned minerals or waste site. The County Council can provide information on these operations or any future development planned for your neighbourhood.</p> <p>You should also be aware of Minerals and Waste Safeguarding Areas, contained within the adopted Minerals and Waste Local Plan (<a href="http://Leicestershire.gov.uk">Leicestershire.gov.uk</a>). These safeguarding areas are there to ensure that non-waste and non-minerals development takes place in a way that does not negatively affect minerals resources or waste operations. The County Council can provide guidance on this if your neighbourhood plan is allocating development in these areas or if any proposed neighbourhood plan policies may impact on minerals and waste provision.</p>
	<p><b>Property Education</b></p> <p>Whereby housing allocations or preferred housing developments form part of a Neighbourhood Plan the Local Authority will look to the availability of school places within a two-mile (primary) and three-mile (secondary) distance from the development. If there are not sufficient places then a claim for Section 106 funding will be requested to provide those places.</p> <p>It is recognised that it may not always be possible or appropriate to extend a local school to meet the needs of a development, or the size of a development would yield a new school.</p>



	<p>However, in the changing educational landscape, the Council retains a statutory duty to ensure that sufficient places are available in good schools within its area, for every child of school age whose parents wish them to have one.</p>
	<p><b>Adult Social Care</b></p> <p>It is suggested that reference is made to recognising a significant growth in the older population and that development seeks to include bungalows etc of differing tenures to accommodate the increase. This would be in line with the draft Adult Social Care Accommodation Strategy for older people which promotes that people should plan ahead for their later life, including considering downsizing, but recognising that people’s choices are often limited by the lack of suitable local options.</p>
	<p><b>Environment</b></p> <p><b>Specific Comments:</b></p> <ul style="list-style-type: none"> <li>• There is no mention of larger scale renewable energy sources such as solar farms or wind farms. Other Neighbourhood plans do take these into account and the group could be mindful of this.</li> <li>• There is no reference regarding electric vehicles and their charge points either on street or in the workplace. The Prime Minister has recently stated new cars and vans powered wholly by petrol and diesel will not be sold in the UK from 2030. The Planning Group may wish to address this.</li> </ul> <p><b>General Comments:</b></p> <p>With regard to the environment and in line with Government advice, Leicestershire County Council (LCC) would like to see Neighbourhood Plans cover all aspects of the natural environment including climate change, the landscape, biodiversity, ecosystems, green infrastructure as well as soils, brownfield sites and agricultural land.</p>

	<p>Climate Change</p> <p>The County Council through its Environment Strategy is committed to reducing greenhouse gas emissions in Leicestershire and increasing Leicestershire’s resilience to the existing and predicted changes in climate. Furthermore, LCC has declared a climate emergency along with most other UK councils. The County Council has committed to becoming carbon neutral as a council by 2030 and to working with others to keep global temperature rise to less than 1.5 degrees Celsius, which will mean in effect needing to achieve carbon neutrality for Leicestershire by 2050 or before. Planning is one of the key levers for enabling these commitments to be met and to meeting the legally binding target set by the government for the UK to be carbon neutral by 2050. Neighbourhood Plans should in as far as possible seek to contribute to and support a reduction in greenhouse gas emissions and to increasing the county’s resilience to climate change.</p> <p>Landscape</p> <p>The County Council would like to see the inclusion of a local landscape assessment taking into account Natural England’s Landscape character areas; Leicester, Leicestershire and Rutland Landscape and Woodland Strategy; the Local District/Borough Council landscape character assessments and the Landscape Sensitivity and Green Infrastructure Study for Leicester and Leicestershire (2017) which examines the sensitivity of the landscape, exploring the extent to which different areas can accommodate development without impacting on their key landscape qualities. We would recommend that Neighbourhood Plans should also consider the street scene and public realm within their communities, further advice can be found in the latest ‘Streets for All East Midlands’ Advisory Document (2006) published by English Heritage.</p> <p>LCC would encourage the development of local listings as per the National Planning Policy Framework (NPPF) and LCC have some data on the social, cultural, archaeological and historic value of local features and buildings (<a href="https://www.leicestershire.gov.uk/leisure-and-community/history-and-heritage/historic-environment-record">https://www.leicestershire.gov.uk/leisure-and-community/history-and-heritage/historic-environment-record</a>)</p>
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### Biodiversity

The Natural Environment and Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, in the exercise of their duties, to the purpose of conserving biodiversity. The National Planning Policy Framework clearly outlines the importance of sustainable development alongside the core principle that planning should contribute to conserving and enhancing the natural environment, providing net gain for biodiversity, and reducing pollution. Neighbourhood Plans should therefore seek to work in partnership with other agencies to develop and deliver a strategic approach to protecting and improving the natural environment based on local evidence and priorities. Each Neighbourhood Plan should consider the impact of potential development or management of open spaces on enhancing biodiversity and habitat connectivity, such as hedgerows and greenways. Also, habitat permeability for habitats and species which addresses encouragement of movement from one location to another such as the design of street lighting, roads, noise, obstructions in water, exposure of species to predation and arrangement of land-uses.

The Leicestershire and Rutland Environmental Records Centre (LRERC) can provide a summary of wildlife information for your Neighbourhood Plan area. This will include a map showing nationally important sites (e.g. Sites of Special Scientific Interest); locally designated Wildlife Sites; locations of badger setts, great crested newt breeding ponds and bat roosts; and a list of records of protected and priority Biodiversity Action Plan species.

These are all a material consideration in the planning process. If there has been a recent Habitat Survey of your plan area, this will also be included. LRERC is unable to carry out habitat surveys on request from a Parish Council, although it may be possible to add it into a future survey programme.

Contact: [planningecology@leics.gov.uk](mailto:planningecology@leics.gov.uk) , or phone 0116 305 4108

	<p><b>Green Infrastructure</b></p> <p>Green infrastructure (GI) is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities, (NPPF definition). As a network, GI includes parks, open spaces, playing fields, woodlands, street trees, cemeteries/churchyards allotments and private gardens as well as streams, rivers, canals and other water bodies and features such as green roofs and living walls.</p> <p>The NPPF places the duty on local authorities to plan positively for a strategic network of GI which can deliver a range of planning policies including: building a strong, competitive economy; creating a sense of place and promote good design; promoting healthier communities by providing greater opportunities for recreation and mental and physical health benefits; meeting the challenges of climate change and flood risk; increasing biodiversity and conserving and enhancing the natural environment. Looking at the existing provision of GI networks within a community can influence the plan for creating &amp; enhancing new networks and this assessment can then be used to inform CIL (Community Infrastructure Levy) schedules, enabling communities to potentially benefit from this source of funding.</p> <p>Neighbourhood Plan groups have the opportunity to plan GI networks at a local scale to maximise benefits for their community and in doing so they should ensure that their Neighbourhood Plan is reflective of the relevant Local Authority Green Infrastructure strategy. Through the Neighbourhood Plan and discussions with the Local Authority Planning teams and potential Developers communities are well placed to influence the delivery of local scale GI networks.</p> <p><b>Brownfield, Soils and Agricultural Land</b></p> <p>The NPPF encourages the effective use of brownfield land for development, provided that it is not of high environmental/ecological value. Neighbourhood planning groups should check with Defra if their neighbourhood planning area includes brownfield sites. Where information is lacking as to the ecological value</p>
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of these sites then the Neighbourhood Plan could include policies that ensure such survey work should be carried out to assess the ecological value of a brownfield site before development decisions are taken.

Soils are an essential finite resource on which important ecosystem services such as food production, are dependent on. They should be enhanced in value and protected from adverse effects of unacceptable levels of pollution. Within the governments "Safeguarding our Soils" strategy, Defra have produced a code of practice for the sustainable use of soils on construction sites which could be helpful to neighbourhood planning groups in preparing environmental policies.

High quality agricultural soils should, where possible be protected from development and where a large area of agricultural land is identified for development then planning should consider using the poorer quality areas in preference to the higher quality areas. Neighbourhood planning groups should consider mapping agricultural land classification within their plan to enable informed decisions to be made in the future. Natural England can provide further information and Agricultural Land classification.

Strategic Environmental Assessments (SEAs)

Information for Neighbourhood Planning groups regarding Strategic Environmental Assessments (SEAs) can be found on the Neighbourhood Planning website ([www.neighbourhoodplanning.org](http://www.neighbourhoodplanning.org)) and should be referred to. As taken from the website, a Neighbourhood Plan must meet certain basic conditions in order to be 'made'. It must not breach and be otherwise compatible with EU obligations. One of these obligations is Directive 2001/42/EC 'on the assessment of the effects of certain plans and programmes on the environment' (Environmental Assessment of Plans and Programmes Regulations, 2004, available online). This is often referred to as the SEA Directive. Not every Neighbourhood Plan needs a SEA, however, it is compulsory to provide when submitting a plan proposal to the local planning authority either:

- A statement of reasons as to why SEA was not required

	<ul style="list-style-type: none"> <li>• An environmental report (a key output of the SEA process).</li> </ul> <p>As the UK has now left the EU, Neighbourhood Planning groups should remain mindful of any future changes which may occur to the above guidance.</p> <p>Impact of Development on Household Waste Recycling Centres (HWRC)</p> <p>Neighbourhood planning groups should remain mindful of the interaction between new development applications in a district area and Leicestershire County Council. The County’s Waste Management team considers proposed developments on a case by case basis and when it is identified that a proposed development will have a detrimental effect on the local HWRC infrastructure then appropriate projects to increase the capacity to off-set the impact have to be initiated. Contributions to fund these projects are requested in accordance with Leicestershire’s Planning Obligations Policy (2019) and the relevant Legislation Regulations.</p>
	<p><b>Communities</b></p> <p>Consideration of community facilities is a positive facet of Neighbourhood Plans that reflects the importance of these facilities within communities and can proactively protect and develop facilities to meet the needs of people in local communities. Neighbourhood Plans provide an opportunity to;</p> <ol style="list-style-type: none"> <li>1. Carry out and report on a review of community facilities, groups and allotments and their importance with your community.</li> <li>2. Set out policies that seek to;             <ul style="list-style-type: none"> <li>• protect and retain these existing facilities,</li> <li>• support the independent development of new facilities, and,</li> </ul> </li> </ol>

	<ul style="list-style-type: none"> <li>• identify and protect Assets of Community Value and provide support for any existing or future designations.</li> </ul> <p>3. Identify and support potential community projects that could be progressed.</p>
	<p><b>Economic Development</b></p> <p>We would recommend including economic development aspirations with your Plan, outlining what the community currently values and whether they are open to new development of small businesses etc.</p>
	<p><b>Fibre Broadband</b></p> <p>High speed broadband is critical for businesses and for access to services, many of which are now online by default. Having a fast broadband connection is no longer merely desirable but is an essential requirement in ordinary daily life.</p> <p>All new developments (including community facilities) should have access to ultrafast broadband (of at least 100Mbps) and allow mechanisms for securing a full fibre broadband provision for each premise and business from at least one network operator, provided on an open access basis. Such provider must deploy a Fibre to the Premise (FTTP) access network structure in which optical fibre runs from a local exchange to each premise.</p> <p>Developers should take active steps to incorporate adequate broadband provision at the pre-planning phase and should engage with telecoms providers to ensure fibre broadband is available as soon as build on the development is complete. Where practical, developers should consider engaging several telecoms providers to encourage competition and consumer choice.</p> <p>The Council supports a 'dig once' approach for the deployment of communications infrastructure and a build which is sympathetic to the character and appearance of the surrounding area. The Council encourages</p>

	telecommunications build which does not significantly impact on the appearance of any building or space on which equipment is located and which minimises street clutter.
	<b>Equalities</b> While we cannot comment in detail on plans, you may wish to ask stakeholders to bear the Council’s Equality Strategy 2016-2020 in mind when taking your Neighbourhood Plan forward through the relevant procedures, particularly for engagement and consultation work. A copy of the strategy can be viewed at: <a href="http://www.leicestershire.gov.uk/sites/default/files/field/pdf/2017/1/30/equality-strategy2016-2020.pdf">www.leicestershire.gov.uk/sites/default/files/field/pdf/2017/1/30/equality-strategy2016-2020.pdf</a>



<b>Respondent 9 : Natural England</b>	
<b>Part of document</b>	<b>Comments</b>
General	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this neighbourhood plan.</p>

<b>Respondent 10 : Davidsons</b>	
<b>Part of document</b>	<b>Comments</b>
General	<p><b>Purpose of the Document</b></p> <p>Neighbourhood Plans are to contain non-strategic policies such as more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.</p> <p>Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies. Neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area. We would welcome confirmation of this matter.</p>
Policy G2	<p><b>POLICY G2: SOUTH-EAST COALVILLE DEVELOPMENT SCHEME</b></p> <p>As you will know, Davidsons are delivering parts of this wider strategic development, which is allocated within the Local Plan, and have established an excellent working relationship with the Parish and District Council. There is land that is unlikely to be required for the future link road which has been reserved for such a future road link around the existing development. This land can be made available for development within the overall masterplan-led development as the County Council are now looking at the potential option of utilising the approved Spine Road which runs through the current site and we consider it is appropriate for the neighbourhood plan to acknowledge this and to identify this land for development. The land, outlined in blue, is between phases 2 and 3 and the rail line, shown in the extract plan below.</p> <p><i>[please refer to the original representation to see the extract plan]</i></p>

	<p>Davidsons would like to discuss this additional development land with the Parish Council. This surplus land is capable of being planned for a modest expansion of the development area for new homes and associated development. This is a positive opportunity to create additional place-making on land that would otherwise have been a road.</p> <p>The land is already allocated in the Local Plan as part of the South East Coalville development. With minimal adjustment to the currently approved Masterplan an enhanced scheme it can be delivered in a sustainable manner.</p> <p>For this reason we consider that express reference should be made to the additional land that should be identified in the neighbourhood plan as suitable for additional development as a formal allocation in line with the Local Plan.</p>
<p>Policy G3</p>	<p><b>POLICY G3: Design</b></p> <p>We support the principles set out in this proposed policy in respect of design. However, we would ask for clarification on what the neighbourhood plan means by 'new and innovative green technologies'. We consider chimneys are an appropriate design feature but not for every dwelling and we would ask that this is stated in the neighbourhood plan. Where roads in developments are to be adopted it is important to acknowledge the standards for adoption set-out by Leicestershire County Council. Has the County Council commented on this proposed policy?</p> <p>Electric vehicle charging points are supported but not necessarily 100% for provision for 1-3 bedroom properties and not 200% for 4+ bedroom properties. This will not necessarily be supported by take-up and presents issues for infrastructure and design, for example where parking is in parking courts or alongside streets.</p>

<p>Policy H1</p>	<p><b>POLICY H1: HOUSING MIX</b></p> <p>In the context of strategic-scale development at South-east Coalville, it is not appropriate for housing mix to specifically meet the latest assessment of identified local needs in Hugglescote and Donington le Heath. This would not be proportionate and we would suggest that this new development is creating a new market and diversifying the market locally. We would ask that this policy does not seek to require a mix arising from local needs when the development is strategic in scale.</p> <p>Furthermore, 4 and 5 bed houses have a role to play in meeting the needs of purchasers. It is not considered appropriate to explicitly reference as being “ a minority of the total” and such mix should be considered as part of the overall mix.</p>
<p>Policy H2</p>	<p><b>POLICY H2: AFFORDABLE HOUSING</b></p> <p>We consider it is not necessary to provide a policy on affordable housing in addition to that which is within the North West Leicestershire Local Plan, adopted November 2017. There are no local dynamics which dictate any difference to the policy in the Local Plan which is already in force.</p> <p>If a new policy were to be prepared it will need to take into consideration the Government’s announcement on First Homes, found at:</p> <p><a href="https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-first-homes-proposals-in-changes-to-the-current-planning-system">https://www.gov.uk/government/consultations/changes-to-the-current-planning-system/outcome/government-response-to-the-first-homes-proposals-in-changes-to-the-current-planning-system</a></p> <p>The Government’s response to a previous consultation set out an intention to change the planning system to ensure that First Homes are delivered across England. This included an intention to set out in policy that 25% of all homes delivered through developer contributions as part of planning obligations agreed under section 106 of the Town and Country Planning Act 1990 should be sold as First Homes.</p>

	<p>First Homes must be discounted by a minimum of 30%. Local authorities and neighbourhood planning groups can require higher minimum discounts at 40% or 50% if need can be evidenced through the most appropriate method available to them (either in the local or neighbourhood plan, an emerging policy or, where appropriate, a Supplementary Planning Document).</p>
<p>NPPF</p>	<p><b>National Planning Policy Framework</b></p> <p>Paragraph 29 of the NPPF, February 2019, states:</p> <p>“Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. Neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies.”</p> <p>This is something Davidsons embraces and wishes to be more closely involved in at Hugglescote.</p> <p>Paragraph 31 of the NPPF, states:</p> <p>“The preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals.”</p> <p>This is relevant for Local Plans and Neighbourhood Plans alike. To satisfy the Basic Conditions, Neighbourhood Plans need to demonstrate a robust evidence base. There is an absence of evidence to justify some of the proposed policies in this plan, leaving policies without justification.</p>
<p>Monitoring/Review</p>	<p><b>Monitoring and Review</b></p>

	<p>We acknowledge the explanation on monitoring and review but we consider this is insufficient. The proposed neighbourhood plan includes policies which are capable of being measured, and which should therefore specifically be monitored and reported on. This requires resource and dedication by the neighbourhood plan body beyond publication of an Annual Monitoring Report prepared at the District level.</p> <p>We request further consideration or monitoring of the outcomes of the policies within the neighbourhood plan and evaluation of the effectiveness of policies in a review of the neighbourhood plan within a defined period of time.</p> <p>Whilst there is no statutory requirement to review or update a neighbourhood plan, it is nonetheless appropriate to set out a timescale for review of the neighbourhood plan and we note the proposal of 2025. We would ask for clarification that this is to conclude the review in 2025 and not just commence the review in 2025. Guidance on this matter is set-out at paragraph 084 of the Planning Practice Guidance. In view of the potential changes at the national level and the emerging new plan for the District we consider it is appropriate for a review of the neighbourhood plan to conclude by 2025 and we request inclusion of this as a commitment in the plan.</p>
<p>Planning White Paper</p>	<p><b>Planning White Paper</b></p> <p>The Planning White Paper (PWP) was published for consultation on 6 August 2020. The PWP proposes significant changes to the planning system which each and every local planning authority, neighbourhood plan body and relevant stakeholders will need to reflect upon and act accordingly.</p> <p>We acknowledge that the neighbourhood plan was prepared/published ahead of the PWP and that the Government does not expect development plans to wait on national-level changes but in the local context of the development plan policies and in light of our concerns that the neighbourhood plan will not deliver a plan for sustainable development, it is right to pause progress.</p>

	<p>We do accept that it is not for neighbourhood plans to progress strategic matters but where there is absence of an up to date strategic policy framework and the Government intends to bring in a new national-level policy framework there is reason to pause progress to allow strategic planning to catch-up and then reflect upon this in revisions to the neighbourhood plan.</p>
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<b>Respondent 11 : Redrow Homes (East Midlands)</b>	
<b>Part of document</b>	<b>Comments</b>
Policy H1 – Housing Mix	<p>The comments below are made in response to the consultation on the Hugglescote and Donington le Heath Neighbourhood Plan. In particular Redrow wish to comment on Policy H1: Housing Mix, repeated below for ease of reference:</p> <p><i>New housing development proposals should provide a mixture of housing types specifically to meet the latest assessment of identified local needs in Hugglescote and Donington le Heath. Applications for single person accommodation (1 bed); small family homes (2 or 3 bedrooms) or homes suitable for older people will be supported. Larger homes (4 or more bedrooms) can feature in the mix of housing but will be expected to provide a minority of the total.</i></p> <p>Policy H1 specifies that new housing proposals should provide a mix of housing types to meet the latest assessment of identified local needs in Hugglescote and Donington le Heath. The policy then goes on to state that larger homes will be expected to provide a minority of the total.</p> <p>The stipulation in relation to larger homes reflects the recommended mix for North West Leicestershire District outlined in the 2017 Housing and Economic Development Needs Assessment (HEDNA). However, this does not provide sufficient flexibility should any later assessment of identified local needs, either in the District as a whole or specifically in Hugglescote and Donington le Heath, evidence the need for a different housing mix. In this regard, it is understood that a revised HEDNA has been commissioned by the Leicester and Leicestershire authorities as part of work on the Strategic Growth Plan and this will form the most up to date evidence in respect of future housing requirements across the District. Policy H1 pre-empts the findings of the new study by specifically stipulating that larger homes will be expected to provide a minority of the total.</p> <p>The policy thus provides an unclear and potentially confusing/conflicting set of preconditions to potential applicants. There is no guidance as to the actual proportions of the preferred mix although, that said, Redrow Homes would strongly caution against the use of any prescriptive housing mix policy which is likely to quickly become out of date. If the policy continues to be based on the recommendations within the 2017 HEDNA, it is likely that the policy would still be used by decision makers in 5-10 years' time meaning the evidence that underpins the policy would be 9-14 years old.</p>



As drafted, Policy H1 could therefore likely lead to an out-of-date housing mix being requested over time, causing friction with house-builders and ultimately impacting upon housing delivery and deliver a housing stock that doesn't adequately reflect need throughout the plan period.

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

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

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

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

*All commercial and residential developments, including one or more houses, replacement dwellings and extensions should continue to reflect the character and context of existing developments in the Neighbourhood Area. However, contemporary and innovative materials and design will be supported where positive improvement can be robustly demonstrated*

*without detracting from this context.*

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

- a) Adequate attention to orientation for natural light and green technology will be implicit in all design proposals;*
- b) all development will enhance and reinforce the local character and sense of place of the specific location in which it is situated. All new proposals for developments of more than one unit must illustrate how the character, size density and layout of the proposed site will not cause an adverse negative impact on the local beauty of the countryside;*
- c) all proposed densities should be concomitant with the surrounding village residential properties and proportionate to the immediate setting;*
- d) adequate footpaths and cycleways, accessible to people with disabilities, must be provided to connect the new residential development with local facilities, the Bardon employment area and shops in Hugglescote and Coalville;*
- e) proposals will be encouraged to have regard to the criteria of "Building for Life 12", to include green spaces to accommodate play areas/benches and promote buffer effects on existing housing where appropriate;*
- f) these design principles recognise the importance of new technologies and product design that will not only help development towards a goal of carbon neutrality, but also help in the unobtrusive evolution of such renewable technology materials, allowing them to seamlessly blend into the character of our villages;*
- g) development that demonstrates new and innovative green technologies will be supported;*
- h) housing design within any one development, should not normally be replicated throughout that development. Each development should reflect the diversity of the surrounding village character;*
- i) chimneys should reflect one of the many styles of the village using brick or other materials that can be seen in the adjacency, chimney pots should be encouraged to maximise decorative finish;*
- j) gables open to prominent view do not need to be represented with equilibrium, but as with existing village housing the use of odd windows to draw the eye with interest, barge boards or decorative gable boards as part of an accepted design scheme again to link with the village architecture;*

- k) any dwelling of above average height should be part of a varied scheme. Proportionate, and sympathetic to the topography of the surroundings and not overbearing on the local topography;*
- l) wherever possible plots should be enclosed by native hedging and where fences are used these must be of a hedgehog friendly design;*
- m) roads should be of varied surface materials to sit in with the landscape. Stone cobbles sets and gravel tarmac creating a softer focus to the hard standing will be supported where viable and appropriate to do so;*
- n) adequate off-road parking should be provided as a minimum of two car parking spaces for properties with three bedrooms or less and three car parking spaces for four bedrooms or more, in line with Highways standards;*
- o) development should incorporate sustainable design and construction techniques to meet high standards for energy and water efficiency, including the use of renewable and lowcost energy technology, solar panels, rainwater harvesters and photovoltaic glass. Larger boundaries to any development to promote or extend the use of nature corridors will be supported;*
- p) all properties of three bedrooms or less should be provided with an electric vehicle charging point. All properties of four or more bedrooms should be provided with at least connections where viable and appropriate to do so;*
- q) development should incorporate, where appropriate, sustainable drainage systems with maintenance regimes to minimise vulnerability to flooding and climate change and ensure that surface water is directed towards the most sustainable outfalls;*
- r) all properties will ensure appropriate provision for the storage of waste and recyclable materials and adequate space for household storage bins; and*
- s) any development proposals within Flood Zones 2 and/or 3 will be subject to a Sequential Test and the Exception Test, where appropriate (in line with the NPPF).*

We note that the criteria is only to be met where appropriate and proportionate to the development but would request that this is further defined to give certainty and clarity to applicants. For example, it should be confirmed that the criteria should only be applied to applications for new planning permission and subsequent Reserved Matters applications. They should not apply to applications to vary existing permissions where this may lead to a conflict within a development. Furthermore, many

developments, such as the South East Coalville Development Scheme have a site specific Design Code that has been approved by the District Council. Where a Design Code exists, this should take precedent and negate the need for the development proposals to meet the Design Criteria prescribed in the Neighbourhood Plan in the determination of any application, as again this could lead to conflicts and is confusing for applicants.

In relation to the specific criteria we comment as follows:

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

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

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

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

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

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

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

o) As noted above, proposed changes to Part L of the UK Building Regulations will implement

	<p>substantial changes aimed at furthering new residential design towards a net-zero carbon future. Implementing such changes through building regulations provides certainty and consistency across developments. This element of the policy is therefore not considered necessary. In any case the policy requires all developments to incorporate the use of renewable and low-cost energy technology that may not always be possible.</p> <p>p) It may not always be possible to provide electric vehicle charging points for all properties. This policy should therefore be re-wording to seek the inclusion of electric vehicle charging points where possible. The need for two connections for properties of four or more bedrooms is considered excessive and unjustified.</p>
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<b>Respondent 12 : Thomas Harley Charities</b>	
<b>Part of document</b>	<b>Comments</b>
Policy G1– Limits to Development	<b>Support</b> - The extent of the defined limits to development shown in Figure 2.1 and referred to Policy G1 are considered to be appropriately identified and justified.
Policy H3 – Windfall Sites	<p><b>Objection</b> - The principle of a Windfall Sites policy is supported, however the arbitrary windfall site threshold of 5 dwellings contained in Policy H3 fails to meet Basic Conditions a) and d).</p> <p>The identification of a threshold for windfall sites does not accord with the NPPF, where the Glossary defines windfall sites as: “<i>Sites not specifically identified in the development plan</i>”. No size thresholds for windfall sites is identified in the NPPF.</p> <p>The adopted Local Plan does not contain any policies for windfall development, it defines Limits to Development under Policy S3 Countryside where the supporting text at paragraph 5.23 states “<i>We have defined Limits to Development around most of our settlements as a means of distinguishing between areas of potential for new development and areas which can be regarded as countryside where development will be considered having regard to the provisions of Policy S3</i>”. The Limits to Development in Neighbourhood Plan area (Policy G1) form part of the Coalville Urban Area in the adopted Local Plan where Policy S2 defines this as the Principal Town and top of the settlement hierarchy where “<i>The largest amount of new development will be directed here</i>”.</p> <p>Accordingly, in seeking to restrict development potential in the Coalville Urban Area under draft Policy H3 as is proposed, and in failing to allocate any sites for development, the Neighbourhood Plan is in clear conflict with the adopted Local Plan,</p>

The policy is not flexible, suitably evidenced and does not take account of site-specific opportunities. The 5 dwelling threshold is not based upon any specific evidence and could prevent sustainable development(s) consisting of more than 5 dwellings coming forward appropriately within the settlement limits. These potentially larger sites could arguably be more sustainable by helping to mitigate a specific issue or by presenting potential opportunities to address specific local issues by improving/providing important community facilities.

The policy currently provides a number of criteria (a-h) that development must satisfy in order to be considered as a sustainable windfall development site. The criteria identified actually provide a useful policy framework to guide the delivery of sustainable development opportunities, without setting a threshold. However, the evidence of local housing need that accompanies the submitted Neighbourhood Plan is woefully inadequate in identifying housing needs; criterion b) therefore requires amendment to be justified.

An update to Policy H3 is therefore required to meet the Basic Conditions in providing a degree of flexibility and to ensure that development accords with the NPPF and the adopted Local Plan. Removing the threshold for windfall sites would remove a significant barrier that could prevent a sustainable development site coming forward.

Revised policy wording is proposed:

*"POLICY H3 Windfall Sites Proposals for infill and redevelopment sites (individual dwellings or small groups of dwellings of up to 5) will be supported where:*

- a) They are within the Limits to Development;*
- b) they help to meet an the identified housing requirement for Hugglescote and Donington le Heath in terms of housing mix (Policy H1);*

	c)...
Policy ENV 3 – Important Open Spaces	<p><b>No objection</b> – Policy ENV 3 seeks to identify those sites to which adopted Local Plan Policy IF3 relates to in respect of the Neighbourhood Plan area. The policy is therefore considered to accord with the Local Plan and national policy. It is worth noting that this policy includes Site 02 Ashburton Road recreation ground, which is also Site 96 in Appendix 5.</p>
Policy ENV 1 – Protection of Local Green Spaces	<p>It is important to recognise that there are a number of policies in the submitted plan that seek to protect sites from development for various reasons. It is not clear the precise rationale for such various designations (ENV1 – local green spaces; ENV2 – sites of environmental significance; ENV3 – important open spaces; ENV4 – local heritage assets; ENV5 – ridge &amp; furrow; ENV6 – biodiversity and habitat connectivity; and ENV7 – important views), but there is certainly a degree of overlap with some of these proposed designations and certainly a lack of appropriate justification in some case having regard to national policy. The first basic condition of a neighbourhood plan is to have appropriate regard to national policy, with paragraph 16 of the NPPF stating that Plans should: “<i>(f) serve a clear purpose, avoiding unnecessary duplication of policies that apply to a particular area (including policies in this Framework, where relevant)</i>”.</p> <p>The following submissions focus on the submitted plan complying with the basic condition of having appropriate regard to national policy; this requires a streamlining of the proposed designations to ensure that policies are appropriately justified having regard to national policy.</p> <p>By way of background, it is helpful to note that my client, Thomas Harley’s Charities, owns the land shown coloured blue and red on the attached plan. The western field is in agricultural use with no public access other than via the public rights of way that cross the land; the eastern field is leased to the parish council (via the district council) who use the land in the north-west</p>



corner for a play area and the remainder as informal recreation land. This is on a rolling lease renewed on the 4th January annually.

**Objection** – Policy ENV 1 is not considered to be justified and does not accord with the NPPF in relation to the identification of Local Green Spaces (LGS) and subsequently fails to meet Basic Condition a).

The identification of all the land forming the Donington Fields proposed Local Green Space designation is not considered to be justified or based upon appropriate evidence having regard to national policy. The extent of the proposed Donington Fields designation includes a number of parcels of land in differing ownerships and with differing functions.

An assessment of various parcels of land are contained within Survey and Research Data at Appendix 5 to the Neighbourhood Plan. Site 96 is a recreation ground and play area and is a distinct parcel of land to the rest of the proposed Local Green Space designation. The site (Ashburton Rd Recreation Ground) is already defined as an important open space and is afforded protection via Policy ENV3 to which we raise no objections. It is therefore duplicitous and contrary to the NPPF for the site to also form part of this proposed Local Green Space designation.

Page 4 of Appendix 5 identifies the approach taken to scoring and the subsequent identification of proposed Local Green Space designations. The approach identifies that sites scoring over 75% (24 out of 32) or more could be considered for the Local Green Space designation.

The proposed Donington Fields LGS designation is made up of the following land parcels that have all been assessed using the criteria and scoring system as set out in Appendix 5:  
Site 85 – scrubland, score of 25  
Site 85A & 90 – horse paddocks, score of 21

	<p>Sites 86, 87, 88 &amp; 89 – National Forest Plantation, score of 32 Site 96 recreation ground, score of 29 Site 97 arable farmland, score of 20</p> <p>Numerous aspects of the scoring are questionable, a number being highly subjective (beauty, tranquillity) and others lacking credible evidence (history, wildlife). Notwithstanding the criteria and scoring allocated, the NPPF is clear at paragraph 100 that Local Green Space designation should only be used where the green space is (in addition to two other requirements): <i>(b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife.</i></p> <p>Sites 86 – 89 the National Forest plantation and site 96 the recreation ground are the only ones that are considered capable of meeting the paragraph 100 criteria. However, paragraph 99 of the NPPF also requires LGS sites to <i>“be capable of enduring beyond the end of the plan period”</i>. As noted above, the lease on the recreation ground to the parish council is renewed annually on 4th January and it cannot therefore be certain that the site will endure beyond the plan period (to 2031). Site 96 would thus fail this requirement of the NPPF.</p> <p>It should however be noted that Site 96 is proposed to be protected under Policy ENV3 – Important Open Spaces, to which we raise no objections.</p> <p>There is a section in the submitted Neighbourhood Plan that precedes the wording of proposed Policy ENV1 entitled ‘The setting of Donington le Heath Manor House’. It is not entirely clear how this part of the plan relates to proposed Policy ENV1, but it appears that the ‘setting’ of Donnington le Heath Manor House is a further reason to preclude development in the area</p>
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identified on Figure 5 of the Plan. The approach of prohibiting development within such a defined area is however flawed, being contrary to national policy and guidance in a number of ways.

Firstly, mapping the extent of a setting in perpetuity or even for a plan period, as the Neighbourhood Plan does in Figure 5, is wholly incorrect and policy and guidance could not be clearer on this matter.

The NPPF states at paragraph ??, with regards to setting, that:

*"Its extent is not fixed and may change as the asset and its surroundings evolve."*

Historic England's Guidance on *The Setting of Heritage Assets* (GPA3 2017) states:

*"While setting can be mapped in the context of an individual application or proposal, it cannot be definitively and permanently described for all time as a spatially bounded area or as lying within a set distance of a heritage asset. This is because the surroundings of a heritage asset will change over time, and because new information on heritage assets may alter what might previously have been understood to comprise their setting and the values placed on that setting and therefore the significance of the heritage asset."*

Furthermore, even if the definition of a setting were appropriate here (and it clearly is not), the setting of the Manor House is presented within the Neighbourhood Plan with no evidence that it has been defined on the basis of a full assessment of setting in line with Historic England Guidance on how areas of setting might contribute to **heritage significance**, which is the terminology used in the relevant policy tests of the NPPF.

Following on from this, these key tests, including that given in Paragraph 196 of the NPPF, do not preclude development which may cause harm to designated heritage assets such as the Listed Manor House, but rather requires a balancing of this harm against the public benefits of the proposed

	<p>scheme. Hence the policy is contrary to the NPPF in requiring the loss or adverse impact upon an area of setting not be permitted other than in exceptional circumstances. Rather, the harm to the <b>heritage significance</b> of an asset through setting should be weighed against the public benefits of a proposed scheme.</p> <p>The draft NP Plan policy can be further demonstrated to be incorrect if it is considered against a hypothetical situation where a scheme was proposed at Donington Fields which was sensitively designed and caused no harm to the heritage significance of The Manor House through changes in setting, but resulted in the 'loss' of the LGS. To consider such a scheme (which would be contrary to the NP Policy) unacceptable for matters relating to heritage would not be in line with national policy if no harm to <b>heritage significance</b> were being caused.</p> <p>In conclusion, for all the reasons set above, the proposed Donington Fields LGS designation should be limited to parcels 86, 87, 88 &amp; 89 as defined in Appendix 5 to the Plan and the Section of the Plan on 'The setting of Donington le Heath Manor House' and Figure 5 should be deleted.</p>
<p>Policy ENV 7: Protection of Important Views.</p>	<p><b>Objection</b> - Policy ENV7 identifies a number of views that the Plan wishes to protect without clear and evidenced justification as required by national policy.</p> <p>Paragraph 31 of the NPPF identifies <i>"that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned, and take into account relevant market signals."</i></p> <p>Paragraph: 036 Reference ID: 8-036-20190721 of the Government's Planning Practice Guidance identifies in relation to the identification of local</p>

	<p>landscape that <i>"where landscapes have a particular local value, it is important for policies to identify their special characteristics and be supported by proportionate evidence."</i></p> <p>The supporting evidence contained in Appendix 7 and the supporting Figure 14 in the Plan, offers only images of sightlines but offer no specific landscape characteristics or features that are important to retain.</p> <p>Views will of course change over time as the landscape changes – hedgerows and vegetation may grow to prevent certain views that are available at present. The NPPF contains no policies specifically on views or on protecting them.</p> <p>Given the lack of evidence or identification of what special characteristics the proposed protected views offer, it is considered that national policy does not support the identification of the listed views in Policy ENV 7 without evidence or justification, it is therefore considered that Policy ENV7 fails Basic Condition (a).</p>
<p>Policy ENV 2: Protection of Sites of an Environmental Significance</p>	<p><b>Objection</b> – This proposed policy seeks to provide protection for sites that are considered locally to be of historic or natural value but fail the criteria for LGS designation. As far as heritage considerations are concerned, the proposed policy fails the Basic Condition of having appropriate regard to national policy for the following reasons.</p> <p>The terminology used in this policy does not match the approach or terminology given in key guidance, including Historic England’s <i>Statements of Significance</i> and the <i>Setting of Heritage Assets</i>, and the NPPF.</p> <p>The Policy maps a number of sites including ‘locally-valued’ archaeological sites and states that:</p> <p><i>"The environmental value of these sites will be balanced against the benefits of any proposed or strategic development affecting them; damage or</i></p>

	<p><i>destruction of the identified environmental features (Appendix 5, Environmental Inventory) should be avoided”.</i></p> <p>The key policy tests of the NPPF, and the whole approach advocated by Historic England in their guidance on assessing impacts across a suite of documents, is that it is any <b>harm to the heritage significance of assets</b> should be weighed against the public benefits of the proposed scheme. The term ‘value’ might be considered to reflect the heritage significance of the asset, but it is the <b>scale of any harm or loss</b> and the significance of the asset (paragraph 197 of the NPPF), that should be considered.</p> <p>Furthermore, the requirement to <b>avoid</b> harm to any such heritage assets is out of line with the NPPF, which requires that harm to non-designated heritage assets be considered as part of a balanced judgement. Accordingly, Policy ENV2 insofar as heritage matters are concerned, fails the Basic Condition in not having regard to national policies.</p>
<p>Policy ENV 5: Ridge and Furrow</p>	<p><b>Objection</b> – The policy fails to have regard to national policies in respect of heritage. It incorrectly states that several areas of ridge and furrow mapped on Figure 11.3 are ‘<i>non-designated local heritage assets</i>’.</p> <p>National guidance on the assessment of ridge and furrow, Historic England and Northamptonshire County Council’s 2001 document ‘<i>Turning the Plough</i>’ gives a methodology for assessing the significance of ridge and furrow earthworks, and applies this to identify 43 Priority Townships where the most significant ridge and furrow is present (Neither Donington nor Hugglescote are identified as such). The methodology given in this document is clear that ridge and furrow should be considered as <b>township units</b>, rather than individual blocks or other groups of earthworks and, as such, where it is considered to be a non-designated heritage asset, it is the entirety of the earthworks within each township (here Hugglescote or Donington) that is one asset, and impacts should be assessed on that township asset as a whole.</p>

	<p>Furthermore, as non-designated heritage assets, any harm to their heritage significance should be considered as part of a balanced judgement, in line with paragraph 197 of the NPPF, rather than to prohibit development.</p> <p>The supporting text for this policy states: <i>"Historic England recognises the national historical importance of ridge and furrow and supports its protection as a non-designated heritage asset".</i></p> <p>Historic England have not stated that all ridge and furrow is of national importance, nor indeed that all ridge and furrow is a heritage asset – their studies have been clear that different areas of ridge and furrow earthworks have different levels of significance and provide a methodology for the assessment of such significance. That methodology has not been applied here and thus Policy ENV5 fails Basic Condition a).</p>
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<b>Respondent 13 : Highways England</b>	
<b>Part of document</b>	<b>Comments</b>
General	<p>Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Hugglescote and Donington le Heath Neighbourhood Plan, Highways England’s principal interest is in safeguarding the M1 Motorway and the A42 Trunk Road which route approximately 5km to the east and 6km to the west of the Plan area respectively.</p> <p>We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Hugglescote and Donington le Heath is required to be in conformity with the existing and emerging North West Leicestershire Local Plan (2011 to 2031) and this is acknowledged within the document.</p> <p>The pre-submission version of the plan acknowledged that North West Leicestershire District Council (NWLDC) had made a resolution to grant planning permission for a number of sites collectively known as South East Coalville Development Scheme. The permitted scheme overlaps the area of the Hugglescote and Donington le Heath Neighbourhood Plan, with around 2,700 dwellings out of the 3,500 total dwellings located in the parish. Among these, 1,900 dwellings are expected to be constructed during the Plan period.</p> <p>In line with the adopted NWLDC Local Plan, the Neighbourhood Plan required no further provision for housing other than through Windfall development. Policy H3 explained that the proposed windfall sites would be limited to a maximum of 5 dwellings in any one location in order not to worsen existing on-road parking issues in the area. The plan also aimed to support existing employment opportunities through Policy E1, and new small-scale employment through Policy E2 provided that it avoids harmful impacts.</p> <p>From review of the submission version of the Hugglescote and Donington le Heath Neighbourhood Plan, we note that there appear to be minimal changes to the pre-submission version, therefore our previous comments remain.</p> <p>Considering the limited scale of the growth proposed in addition to the already committed developments, we would not expect that there will be any significant impacts on the operation of the SRN in the area.</p>



	However, we welcome the inclusion of Policy T1 for the provision of Transport Assessments for new housing developments, to demonstrate that they will not have a severe impact on the highway network.
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<b>Respondent 14 : Harworth Group</b>	
<b>Part of document</b>	<b>Comments</b>
Policy G2 – South-East Coalville Development Scheme	<p>This policy is generally supported. It should be noted that this is an allocated site in the North West Leicestershire Local Plan 2011-2031 and obtained outline planning permission on 26 September 2016.</p> <p>The South East Coalville Development Scheme incorporates a significant amount of land whereby residential development has been permitted. There are already S106/S278 Agreements in place which legally bind the applicants to contribute significant amounts of money towards mitigating the traffic impacts. In particular, the 'Coalville Transport Infrastructure Package' within the signed S278 Agreement for the South East Coalville SUE identifies a number of junctions to be improved that will be funded by the contributions alongside funding of 2 new bus routes.</p> <p>The development is also subject to a Masterplan and Design Code, which requires Harworth Group and housebuilders to provide a significant amount of open space and a landscape-led design approach as part of the development which will span approximately 15 years.</p> <p>Harworth Group is the landowner and developer and will work in partnership with housebuilders to ensure the scheme brings a cohesive and high-quality residential development that integrates with the wider area.</p>
Policy G3 - Design	<p>Representations to the Pre-submission consultation of the Neighbourhood Plan on behalf of Harworth Group outlined that no viability assessment had been undertaken to support aspects of the</p>

	<p>policy requirements. It is suggested that criteria p) is amended as follows so that it captures all residential properties (strikethrough of text refers to deletion, and bold text refers to additions):</p> <p>all properties of three bedrooms or less should be provided with an electric vehicle charging point. <b>and A</b>all properties of four or more bedrooms should be provided with at least two connections where viable and appropriate to do so;</p>
<p>Policy H1 – Housing Mix</p>	<p><b>OBJECTION</b></p> <p>The HEDNA report (2017) provides guidance on the NWLDC housing mix, which is referred to in the postscript to Policy H6 of the North West Leicestershire Local Plan 2011-2031. At paragraph 7.47 of the Local Plan, it goes on to highlight that</p> <p><i>"It is recognised that there may be a need for local variations and therefore the above percentages are not intended to be prescriptively applied to every site. Other relevant factors include population profiles, location, balancing recent local delivery, rebalancing the current mix and the turnover of properties at the local level as well as the nature of the development site and the character of the area."</i></p> <p>The housing mix policy in the North West Leicestershire Local Plan is therefore not prescriptive and provides opportunity to respond to the site context including development viability and deliverability. The NP housing mix policy is contrary to this approach.</p> <p>The Housing Needs Report (2017) at Appendix 4 of the Neighbourhood Plan does not provide sufficient evidence to restrict the requirement for larger homes. The report identifies that the existing proportion of homes with four or more bedrooms is close to the regional and national rates but does not analyse a number of</p>

	<p>demographic and economic aspects which are fundamental to understanding future housing need which include economic growth, affordability, market signals, migration, etc.</p> <p>In addition, there is no viability evidence to support the policy. The policy places further burden on developments without justification and therefore could make sites undeliverable. The policy therefore fails to meet the Basic Conditions to have regard to national policies and guidance, to contribute to the achievement of sustainable development and to be in general conformity with the strategic policies contained in the development plan for the area. It is therefore suggested that the policy is amended as follows (strikethrough of text refers to deletion):</p> <p><i>New housing development proposals should provide a mixture of housing types specifically to meet the latest assessment of identified local needs in Hugglescote and Donington le Heath. Applications for single person accommodation (1 bed); small family homes (2 or 3 bedrooms) or homes suitable for older people will be supported. <del>Larger homes (4 or more bedrooms) can feature in the mix of housing but will be expected to provide a minority of the total.</del></i></p>
<p>Policy ENV 2: Protection of Sites of an Environmental Significance</p>	<p><b>OBJECTION</b></p> <p>From the evidence submitted within Appendices 5 and 7, it is not clear why field 204 in-between the disused railway lines is designated as a 'Historic Environment site', as shown on Figure 5.1.</p> <p>When assessing proposals that affect non-designated heritage assets, Paragraph 197 of the NPPF requires a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset. There is no requirement to avoid harm.</p> <p>The same planning balance is generally applicable in relation to the</p>

	<p>designated natural environment sites. Paragraphs 174 and 175 encourages protection and enhancement and outlines that planning permission should be refused if <b>significant</b> harm to biodiversity from a development cannot be avoided, adequately mitigated or, as a last resort, compensated. Policy ENV2 does not distinguish this hierarchy or the avoidance of <b>significant</b> harm.</p> <p>Accordingly, Policy ENV2 fails to meet the Basic Conditions as it does not have regard to national policies and guidance. It is suggested that the policy is reworded as follows (strikethrough of text refers to deletion):</p> <p><i>The sites listed and mapped (figures 5.1, 5.2) have been identified as being of local significance for their environmental features (natural and/or historical). They are ecologically important in their own right, their historical features are extant and have visible expression, or there is proven buried archaeology on the site, and they are locally valued. The environmental value of these sites will be balanced against the benefits of any proposed or strategic development affecting them-; <del>damage or destruction of the identified environmental features (Appendix 5, Environmental Inventory) should be avoided</del></i></p>
<p>Policy ENV 5: Ridge and Furrow</p>	<p><b>OBJECTION</b></p> <p>The Historic England and Northamptonshire County Council’s document ‘<i>Turning the Plough</i>’ (2001) does not identify Hugglescote in the Priority Townships where most significant ridge and furrow is present.</p> <p>The guidance also sets out a methodology for assessing the significance of ridge and furrow earthworks, which outlines that ridge and furrow should be considered as township units rather</p>

than individual blocks or other groups of earthworks. In this respect, not all ridge and furrow is of national importance or a heritage asset in their own right as it is dependent on the significance to the township unit. Where ridge and furrow is considered to be a non-designated heritage asset, it is the entirety of the earthworks within each township that is one asset, and impacts should be assessed on that township asset as a whole. The policy has not followed this methodology.

It is also considered that the identification of surviving ridge and furrow in Hugglescote and Donington le Heath on Figure 9.3 is not consistent with the evidence in Appendix 7 or as shown on Figures 9.1 and 9.2 within the NP.

It is noted that Paragraph: 040 Reference ID: 18a-040-20190723 of the PPG outlines that:

*"There are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes and conservation area appraisals and reviews. Irrespective of how they are identified, it is important that the decisions to identify them as non-designated heritage assets are based on **sound evidence**."* (our emphasis)

Evidence within the information submitted to support application 13/00956/OUTM, which was approved by NWLDC on 26 September 2016, provides further information in relation to the archaeology associated with South East Coalville development area. Attached with these representations is the Archaeological Geophysical Survey (dated 30 May 2013) and relevant drawings associated with field 15 identified in the report (field 140 in Figure 9.3 in the Hugglescote and Donington le Heath Neighbourhood Plan).

	<p>At page 17 of the geophysical survey, it identifies field 15 as having “weak linear/curvi-linear responses associated with ridge and furrow” which are associated with buried remnants of ridge and furrow that have very limited heritage value. There is also no evidence within Appendix 6 of the NP that shows significant upstanding remains of ridge and furrow in field 140.</p> <p>In addition, paragraph 197 of the NPPF outlines that any harm to their heritage significance should be considered as part of a balanced judgement rather than to prohibit development.</p> <p>Accordingly, the policy fails to meet the Basic Conditions as it has not had regard to national policies and advice contained in the relevant guidance. The evidence supporting the policy must therefore be reviewed, field 140 should be removed from any designation, and it is suggested that the policy wording is revised as follows (strikethrough of text refers to deletion, and bold text refers to additions):-</p> <p><i>The areas of ridge and furrow earthworks mapped here (Figure 9.3) are non-designated local heritage assets. Any loss or damage arising from a development proposal (or a change of land use requiring planning permission) <del>is to be avoided;</del> the benefits of such development <b>to the heritage asset</b> must be balanced against <b>the scale of harm and</b> significance of the ridge and furrow features as heritage assets.</i></p>
<p>Policy ENV 7: Protection of Important Views.</p>	<p><b>OBJECTION</b></p> <p>Policy ENV7 identifies a number of views that the Plan wishes to protect, including viewpoint 6 from Hugglescote Cemetery and the N50 Definitive Map Footpath, without clear and evidenced justification.</p>

	<p>Paragraph 170 of the NPPF outlines that planning policies should contribute to and enhance the natural and local environment by following the criteria outlined which includes recognising the intrinsic character and beauty of the countryside. This does mean protecting the countryside for its own sake. The evidence does not identify the key characteristics of the viewpoints that contribute to the character of the landscape or the setting and character of Hugglescote.</p> <p>The supporting evidence contained in Appendix 7 and Figure 14 in the Neighbourhood Plan only include images of sightlines but offer no specific landscape characteristics or features that are important to retain. In addition, views will change over time as the landscape changes and development associated with the SE Coalville occurs. In addition, hedgerows and vegetation may grow to prevent certain views that are available at present.</p> <p>The policy is therefore ambiguous and does not have regard to national policies or guidance and therefore fails the Basic Conditions.</p>
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<b>Respondent 15 : Dr Theresa Eynon (District &amp; County Councillor)</b>	
<b>Part of document</b>	<b>Comments</b>
Policy G1	<p>I support the limits of development, protecting land to the south and west of the village centre.</p> <p>Hugglescote has taken the brunt of development in South East Coalville with most of the land between Hugglescote, Bardon and Ellistown already zoned or committed for housing or employment land.</p> <p>The land to the south and west includes wetlands as well as some agricultural land. These need to be protected as part of our commitment to taking climate change seriously.</p>
Policy G2b	<p>I support the intention to direct traffic away from Hugglescote village centre.</p> <p>The SE Coalville development is ideally placed for employment opportunities at East Midlands Airport, Burton, Derby or Birmingham. With so much development taking place in the east of the Parish, infrastructure improvements are needed to manage the increased traffic. Road infrastructure needs to encourage commuters to approach and leave their homes via the A511 rather than cut through the villages of Packington, Ravenstone, Snibston, Donington le Heath and Hugglescote in an attempt to avoid congestion on the major highway.</p> <p>This policy is consistent with other Neighbourhood Plan Policies which work towards reducing vehicle movements through the village centre include Policy G2b (cycleways and footpaths), Policy T3 (support for the Leicester to Burton Railway line) and Policy E3 (increased home-working) all of which will improve the local environment and tackle climate change.</p>
Policy G3d	<p>I support Policy G3d and the intention that new residential development will be connected with local facilities by adequate and accessible footpaths and cycleways.</p> <p>I support the idea of using the old mineral line to achieve the ambitions of Policies G3d.</p> <p>To be consistent with this Policy, Policy T1c needs to be strengthened. The Parish does not just need 'improvements' to pedestrian and cycle routes but also new provision of such routes for new developments.</p>
Policy T1c	<p>Policy T1c needs to be strengthened so that it is consistent with Policy G3d.</p> <p>The Parish does not just need 'improvements' to pedestrian and cycle routes. It also needs new provision of active travel routes for new housing and employment areas.</p>

	<p>I support the idea of using the old LMS line to achieve this ambition . (I assume that it is this line, that passes behind Newbridge School, that is being referred to on page 45?)</p>
Policy G3r	<p>Policy G3r needs to include a comment on the maximum carry distance from the house to the bin-store (NWLDC's is 25m I believe). It should also recommend accessibility for the type of waste vehicles used by NWLDC.</p> <p>Placing bin-stores at end of private cul-de-sacs and drives that are not accessible by large waste collection vehicles does not encourage recycling and can lead to waste materials blowing about the streets.</p>
Policy T3	<p>I agree that reopening of the Leicester to Burton Railway line would be a welcome improvement to local public transport. I am pleased to see the Neighbourhood Plan protecting the route.</p> <p>The plan describes Public Transport as 'adequate'. I would ask 'adequate for what and for whom?' The current bus service to Leicester acts as a barely adequate safety net service for those people who cannot drive. It takes 28 minutes to travel from Forest Road, Hugglescote to the Leicester Royal Infirmary. It takes 1hr and 32 minutes by bus. This level of service does not make Hugglescote an attractive place to live for people working in Leicester town centre. Even the most determined environmentalist is unlikely to wish to spend ten hours a week sitting on a bus as part of their daily commute if they had access to a car instead.</p> <p>Reopening the Leicester to Burton Railway to passenger transport would make Hugglescote a much more attractive place to live. It would connect Hugglescote with major centres of employment in Leicester, Burton and beyond to Birmingham. It would also connect Hugglescote to the attractions in the National Forest such as Conkers, Moira Furnace and Hicks Lodge.</p>
Policy T2	<p>I am pleased to see Policy T2 address the loss of off-street parking.</p> <p>Fairfield Road and Crescent Road are mostly Victorian houses with no off-street parking provision. There used to be parking available next to The Gate Inn. This area was closed off after planning permission was given for housing. There used to be off-street parking on Fairfield Road in the form of garages until planning permission was given to build housing on the site.</p> <p>Residents who depended on these garages asked for the plans to include off-street parking available to residents. Since gaining planning permission the owner has excluded the tenants. The site is now sits behind Heras fencing, the garages empty. The vehicles that used to occupy those garages have to be parked somewhere and that somewhere often ends up with residents in Garfield Road struggle to get out of their private drives.</p>

Page 10	The great industrialists George and Robert Stephenson are spelled with a `ph` – please correct typographical error!
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