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Meeting	LOCAL PLAN COMMITTEE
Time/Day/Date	6.00 pm on Wednesday, 31 March 2021
Location	Remote Meeting using Microsoft Teams
Officer to contact	Democratic Services 01530 454512

AGENDA

Item		Pages
1	APOLOGIES FOR ABSENCE	
2	DECLARATION OF INTERESTS	
	Under the Code of Conduct members are reminded that in declaring disclosable interests you should make clear the nature of that interest and whether it is pecuniary or non-pecuniary.	
3	PUBLIC QUESTION AND ANSWER SESSION	
	To receive questions from members of the public under rule no.10 of the Council Procedure Rules.	
4	MINUTES	
	To confirm and sign the minutes of the meeting held on 27 January 2021	3 - 6
5	LOCAL PLAN SUBSTANTIVE REVIEW - HOUSING REQUIREMENTS	
	Report of the Head of Planning and Infrastructure	7 - 12
6	LOCAL PLAN SUBSTANTIVE REVIEW - RENEWABLE ENERGY STUDY	
	Report of the Head of Planning and Infrastructure	13 - 20
7	HUGGLESCOTE & DONINGTON LE HEATH NEIGHBOURHOOD PLAN (SUBMISSION DRAFT) AND NEIGHBOURHOOD PLANNING UPDATE	
	Report of the Head of Planning and Infrastructure	21 - 64

Circulation:

Councillor J Bridges (Chairman)
Councillor D Harrison (Deputy Chairman)
Councillor D Bigby
Councillor R Boam
Councillor J Hoult
Councillor R Johnson
Councillor J Legrys
Councillor V Richichi
Councillor A C Saffell
Councillor N Smith
Councillor M B Wyatt
Councillor R Ashman (Portfolio Holder)

MINUTES of a meeting of the LOCAL PLAN COMMITTEE held in the Remote Meeting using Microsoft Teams on WEDNESDAY, 27 JANUARY 2021

Present: Councillor J Bridges (Chairman)

Councillors D Bigby, R Boam, J Hoult, J Legrys, K Merrie MBE (Substitute for Councillor D Harrison), V Richichi, A C Saffell, N Smith, M B Wyatt and D Everitt (Substitute for Councillor R Johnson)

Officers: Mr T Delaney, Mr C Elston, Ms S Lee, Mr I Nelson, Miss S Odedra and Mrs R Wallace

27 APOLOGIES FOR ABSENCE

Apologies for absence were received from Councillor D Harrison.

28 DECLARATION OF INTERESTS

Councillor D Bigby declared a non-pecuniary interest in all three Local Plan Review items (Item 5, 6 and 7) as he had commented on the Local Plan Review during the public consultation process prior to him becoming an Elected Member but had come to the meeting with an open mind.

29 PUBLIC QUESTION AND ANSWER SESSION

There were no questions received.

30 MINUTES

Consideration was given to the minutes of the meeting held on 10 December 2020.

It was moved by Councillor V Richichi, seconded by Councillor J Legrys and

RESOLVED THAT:

The minutes of the meeting held on 10 December 2020 be approved as a correct record.

31 LOCAL PLAN REVIEW - HOUSING REQUIREMENTS

The Planning Policy Team Manager presented the report to Members highlighting the change in approach to the standard method of calculation and the effect it would have on the local housing need figure for North West Leicestershire.

Following a discussion on the constant changes and uncertainty for housing figures Councillor J Legrys proposed that an additional recommendation be considered as follows:

‘Members of the Committee to receive a written briefing note on the progress of the local housing need requirement on a regular basis.’

It was seconded by Councillor D Bigby. The motion was put to the vote and was carried.

A Member raised concerns with the intention to appoint consultants at this stage when the HEDNA was being prepared and would be available the Summer. The Planning Policy Team Manager explained that the appointment of consultants would not only provide expertise in helping to identify an appropriate housing figure but also provide an independent opinion, which was essential. He clarified that in order to meet the 2022

deadline it was crucial that work began now rather than to wait for the HEDNA and although it would be difficult, unfortunately there was no alternative at this point.

Concerns were raised in relation to the constant need to adjust figures due to the changing guidance and the instability this provided. A Member felt that it was difficult to take any proposals seriously when it could all change in a matter of weeks and felt that the whole process was flawed.

It was moved by Councillor J Legrys, seconded by Councillor D Bigby and

RESOLVED THAT:

- 1) The revised Local Housing Need of 359 dwellings be noted.
- 2) The Local Housing Need as a minimum figure be noted.
- 3) The need to consider possible adjustments to the Local Housing Need figure to accord with the Planning Practice Guidance be noted.
- 4) The intention to appoint consultants to provide further advice on the matter be noted.
- 5) Members of the Committee receive a written briefing note on the progress of the local housing need requirement on a regular basis.

32 LOCAL PLAN REVIEW – EMPLOYMENT LAND REQUIREMENTS

The Principal Planning Policy Officer presented the report to Members highlighting the results of the recent assessment of the need for employment land within the District.

An initial discussion was had on the office space requirement and a number of sites were mentioned. As the Committee was not the appropriate place to discuss individual sites, it was agreed for Members to discuss the matter outside of the meeting with officers if desired.

In response to a question from a Member, the Planning Policy Team Manager explained that the report was to note the work undertaken to date and not to make any final decisions. He reported that more work was required but due to the uncertainty of the upcoming HEDNA, flexibility was required as guidance may continue to change. Officers would continue to plan with the information available going forward.

A Member commented on the need to set aside and protect specific sites from being used as warehouses. A plea was made from the Member in relation to Policy EC2 part 2 and its threat to the countryside, he asked that the utmost be done to obtain a realistic figure for the amount of employment land actually required and that suitable sites be identified and allocated in the right place to satisfy the needs. During this discussion, Councillor D Bigby proposed that the following recommendation be added to those already stated within the report:

‘The Planning Policy Team, when considering the allocation of employment land in the Substantive Local Plan Review, take into account the Committee’s strong preference that the Revised Local Plan will not include current Policy EC2 part 2 and current paragraph S3 or their equivalents.’

The proposal was seconded by Councillor J Legrys.

The Planning Policy Team Manager strongly advised Members not to support the proposal at this time as much more work was required to ensure flexibility and removing the policy would take away that flexibility. He accepted that there was a need to look at the wording of the policy, but he felt it was too premature to make a decision at this stage. He assured Members that the policy would be addressed in the review.

A lengthy discussion ensued on the proposed recommendation and a number of questions on clarity of facts within the report were answered by officers. During these discussions, it was also agreed that Members receive a regular written briefing note on progress as proposed for the previous item.

The motion for the additional recommendation was then put to the vote and was lost.

The officer's recommendations were moved by Councillor G Hoult, seconded by Councillor R Boam and it was

RESOLVED THAT:

- 1) It be noted that the findings of the economic evidence for the Substantive Local Plan Review with respect to Future Employment Land requirements and start up workspace.
- 2) It be noted that further work would be done to assess the implications of the findings for the Substantive Local Plan Review and that these would be reported to a future meeting of this committee.
- 3) Members of the Committee receive a written briefing note on the progress of the employment need requirement on a regular basis.

33 LOCAL PLAN REVIEW – RETAIL CAPACITY STUDY UPDATE

The Planning Policy Team Manager presented the report to Members highlighting the findings of the updated retail capacity study.

Members welcomed the findings and appreciated the amount of estimation required at this stage. The need for retail units was acknowledged, especially the type that people wanted to visit but it was clear that it was difficult to know what would happen going forward, particularly in light of the current COVID-19 pandemic

It was moved by Councillor V Richichi, seconded by Councillor J Legrys and

RESOLVED THAT:

The findings of the updated Retail Capacity Study be noted.

34 DISEWORTH VILLAGE DESIGN STATEMENT

The Planning Policy Team Manager presented the report and referred Members to the outcome of the revised Diseworth Village Design Statement (VDS) consultation at appendix 1 of the report. It was reported that Cabinet had considered the matter at its meeting on 12 January 2021 and had recommended that the Local Plan Committee adopt the revised Diseworth VDS as a Supplementary Planning Document in accordance with the Council's Constitution.

It was moved by Councillor J Legrys, seconded by Councillor D Bigby and

RESOLVED THAT:

The revised Diseworth Village Design Statement be adopted as a Supplementary Planning Document subject to the changes highlighted in the report to Cabinet on 12 January 2021.

The meeting commenced at 6.00 pm

The Chairman closed the meeting at 8.20 pm

LOCAL PLAN COMMITTEE – 31 MARCH 2021

Title of Report	LOCAL PLAN SUBSTANTIVE REVIEW – HOUSING REQUIREMENTS	
Presented by	Ian Nelson Planning Policy and Land Charges Team Manager	
Background Papers	National Planning Policy Framework	Public Report: Yes
	Planning Practice Guidance	Key Decision: Yes
Financial Implications	The cost of the review is met from existing budgets which are reviewed as part of the annual budget setting process.	
	Signed off by the Section 151 Officer: Yes	
Legal Implications	Legal implications considered in the preparation of this report	
	Signed off by the Monitoring Officer: Yes	
Staffing and Corporate Implications	None identified	
	Signed off by the Head of Paid Service: Yes	
Purpose of Report	To provide an update for Members in respect of the Local Housing Need as a result of the announcement from government in respect of changes to the standard method.	
Recommendations	THAT LOCAL PLAN COMMITTEE AGREES TO TEST A RANGE OF HOUSING REQUIREMENTS AS SET OUT AT PARAGRAPH 4.13 OF THIS REPORT	

1 INTRODUCTION

- 1.1 Members will recall that the 27 January 2021 meeting of this Committee considered a report in respect of the issue of housing requirements and the implications for the substantive review following the decision by government to further change its approach in respect of the standard method.
- 1.2 The report referred to above, noted that the outcome from the standard method was a figure of 359 dwellings per annum.
- 1.3 Since the meeting officers have continued to give some thought as to how progress on the substantive review can be progressed in the light of the ongoing uncertainty about the likely future housing requirement to be planned for. This report sets out proposals for how this can be done whilst having regard to national policies with which the Local Plan will need to be consistent.

2.0 WHAT DOES NATIONAL POLICY AND GUIDANCE SAY?

- 2.1 National policy is clear that when setting a housing requirement the starting point is the standard method developed by the government. For example, the National Planning Policy Framework (NPPF) is clear that *“To determine the minimum number of homes needed, strategic policies should be informed by a local housing need assessment, conducted using the standard method in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals. In addition to the local housing need figure, any needs that cannot be*

met within neighbouring areas should also be taken into account in establishing the amount of housing to be planned for.”

- 2.2 Further guidance is provided by the Planning Practice Guidance (PPG). This states “*The standard method [set out below] identifies a minimum annual housing need figure. It does not produce a housing requirement figure*”.

3.0 THE LEICESTER AND LEICESTERSHIRE POSITION

- 3.1 Members will be aware that Leicester City has previously declared that it is unable to accommodate all of its housing within the city boundary. The level of unmet need declared was about 7,800 dwellings. As a consequence of the changes announced by the government in December 2020, the level of unmet need is now about 18,000 dwellings.
- 3.2 Work to agree a redistribution of the previously declared unmet need was at a relatively advanced position when the government announced the changes to the standard method. This had included building in a significant degree of flexibility to allow for possible changes. However, the addition of a further 10,000 dwellings to the unmet need is over and above the flexibility which had been allowed for.
- 3.3 Further work is now being undertaken to agree a redistribution of the unmet need. This includes the commissioning of a Housing and Economic Needs Assessment as well as Strategic Growth Options and Constraints Mapping and a Strategic Transport Assessment.
- 3.4 It is anticipated that the Housing and Economic Needs Assessment will be completed in Autumn 2021. This piece of work will ultimately inform the version of the Local Plan that is submitted for Examination. However, we cannot afford to wait until then to start to develop options for how development could be distributed and which might be the best sites to propose as allocations. We need to identify some form of housing figure on an interim basis to help develop such options and ideas.

4.0 DEVELOPING A HOUSING REQUIREMENT

- 4.1 Whilst the Local Plan will need to establish a single figure, doing that at the present time is fraught with difficulty, not least the risk that whatever is chosen will not be anything like the final figure.
- 4.2 One way round this is to test a range rather than a specific figure. As part of the Sustainability Appraisal it is necessary to consider reasonable alternatives. This requires not one figure, but at least two, and so is something which will need to be considered in any event.
- 4.3 Using this approach, as the national guidance makes clear, we can take the outcome from the standard method (359 dwellings) as a starting point and to then simply look at alternatives that are higher (they cannot be less). It is common for this to be done by considering, for example, a low, medium and high option. This is what was proposed in the report to the Local Plan Committee on 10 December 2020 (just before the changes to the standard method were announced).
- 4.4 In terms of establishing a range of options, this can be done by having regard to a number of potential housing figures that are already established in other documents. Other than the standard method, the HEDNA sets out requirements to 2031 (481 dwellings) and 2036 (448 dwellings), whilst the Strategic Growth Plan (SGP) identifies a figure for North West Leicestershire for 2031-50 of 512 dwellings per annum. The SGP states (page 16) that “*The authorities in Leicester & Leicestershire agree that the distribution in Table 4 will be used as the basis for future Local Plans*”. This in itself, provides a degree of justification for its use.

- 4.5 The NPPF notes that exceptional circumstances can be used to justify an alternative approach [to the standard method] “*which also reflects current and future demographic trends and market signals*” [emphasis added].
- 4.6 Market signals could be taken to refer to build rates as an indicator of market demand. For the period 2011- 20 the build rate have averaged 616 dwellings per annum, compared to a requirement of 481 dwellings.
- 4.7 The latest demographic trends are provided by the 2018-based household projections. These have been rejected by the government for use with the standard method, but this does not mean they are irrelevant. The projections contain 5 different projections, with the principal projection identifying an annual growth of 707 households in the district between 2020 and 2039.
- 4.8 This is higher than the average build rate since 2011. Furthermore, it is consistent with the NPPF requirement to have regard to demographic trends. Therefore, it is considered to be a more appropriate further option than the build rate.
- 4.9 As demographic trends are pointing to a much higher growth than generated from the standard method, but also the other sources referred to in the PPG it is considered, that it would be appropriate to base a fourth option on the principal projection figure of 707. However, as this is a figure for households and not dwellings, we first need to make an adjustment. To be consistent with the HEDNA we can simply add an uplift which takes account of vacant homes. Based on a vacancy rate for the district as at the 2011 census of 3.3% provides a figure of 730 dwellings.
- 4.10 As the HEDNA includes two figures we need to decide which would be the most appropriate to use. The figure of 481 is for the period 2011-31 whilst 448 is for 2011-36. As the latter period covers most (but not all) of the projected plan period we are planning for (2020-39) it is considered that this would be the most appropriate figure to use.
- 4.12 It should be noted that the standard method figure is to be adjusted in April when new affordability data is published. A report from an established national planning consultancy suggests that the figure for North West Leicestershire would increase slightly to 369 dwellings. If this is confirmed then it would replace the figure of 359 dwellings.
- 4.13 Therefore, we now have the following range to be taken forward:
- 359 dwellings (standard method) (or such other figure following the publication of new affordability data)
 - 448 dwellings (HEDNA)
 - 512 dwellings (Strategic Growth Plan)
 - 730 dwellings (2018-based household projections)

5.0 WHAT MIGHT THESE MEAN IN TERMS OF ADDITIONAL PROVISION?

- 5.1 To provide an indication as to what these figures might mean and assuming a plan period of 2020-39, the following overall requirements would arise.

Scenario	Annual Amount (a)	Number of plan years (b)	Total Requirement 2020-39 (a x b)
Standard Method	359	19	6,103
HEDNA	448	19	8,512
Strategic Growth Plan	512	19	9,728
2018-based projections	730	19	13,870

- 5.2 It will be appreciated that we are not starting with a blank sheet of paper; a significant amount of new housing development is already committed, whether it has the benefit of planning permission or is an allocation in the adopted Local Plan. Using the figures in the latest housing trajectory (April 2020 based) up to 2031, (the end date of the adopted Local Plan) it is estimated that 6,702 dwellings will be completed. A number of the larger developments (e.g. South-East Coalville) will not be completed until after 2031. When these are taken into account as well, the total number of dwellings which it is projected will be built by 2039 is 8,784. When this is deducted from the requirements in the various scenarios the following shortfall in provision results.

Scenario	Annual Amount	Total Requirement 2020-39	Total projected provision	Over provision/ Shortfall
Standard Method	359	6,103	8,784	+2,681
HEDNA	448	8,512	8,784	+272
Strategic Growth Plan	512	9,728	8,784	-944
2018-based projections	730	13,870	8,784	-5,086

- 5.3 It can be seen from the scenarios based on the standard method and the HEDNA that there would be sufficient provision made through existing commitments. However, for the scenarios based on the Strategic growth Plan and the 2018-based projections there would be a shortfall ranging from about 950 dwellings to 5,100 dwellings.

6.0 NEXT STEPS

- 6.1 The four growth scenarios outlined above will be taken forward for testing as part of the Sustainability Appraisal process. It will be necessary to develop scenarios for how any additional growth might be distributed across the district. For example, one option would be to mirror the split of development in the adopted Local Plan, whilst another option might be to focus growth upon the main settlements such as Coalville, Ashby de la Zouch or Castle Donington whilst other options might include a new settlement.
- 6.2 As noted previously it is anticipated that the outcome from the Housing and Economic Assessment study will inform the version of the Local Plan which the council will submit for Examination. It is unlikely that the figure from the Housing and Economic Assessment will match exactly any of those identified above. It is, however, hoped that it would fall within the range of 359 to 730 dwellings, but that if it does not that any need for additional work (and hence time) will be minimised as far as possible.

Policies and other considerations, as appropriate	
Council Priorities:	Our communities are safe, healthy and connected Local people live in high quality, affordable homes Supporting businesses and helping people into local jobs Developing a clean and green district
Policy Considerations:	None
Safeguarding:	No issues identified
Equalities/Diversity:	An Equalities Impact Assessment of the Local Plan review will be undertaken as part of the Sustainability Appraisal.
Customer Impact:	No issues identified
Economic and Social Impact:	No issues identified at this stage
Environment and Climate Change:	No issues identified at this stage
Consultation/Community Engagement:	None
Risks:	A risk assessment of the review has been undertaken and is reviewed at the officer Project Board meetings.
Officer Contact	Ian Nelson Planning Policy and Land Charges Team Manager 01530 454677 ian.nelson@nwleicestershire.gov.uk

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LOCAL PLAN COMMITTEE – WEDNESDAY 31 MARCH 2021

Title of Report	RENEWABLE AND LOW CARBON ENERGY STUDY	
Presented by	Ian Nelson Planning Policy and Land Charges Team Manager	
Background Papers	National Planning Policy Framework	Public Report: Yes
	National Planning Practice Guidance Zero Carbon Roadmap Renewable and Low Carbon Energy Study	Key Decision: Yes
Financial Implications	The cost of the study is met from existing budgets which are reviewed as part of the annual budget setting process.	
	Signed off by the Section 151 Officer: Yes	
Legal Implications	None from the specific content of this report. In due course the planning policy implications of any climate change evidence will be incorporated in a consultation document for the Substantive Local Plan Review. The Local Plan Review process as a whole must accord with the legal requirements set out in legislation and guidance.	
	Signed off by the Monitoring Officer: Yes	
Staffing and Corporate Implications	None identified	
	Signed off by the Head of Paid Service: Yes	
Purpose of Report	To inform Members that a Renewable and Low Carbon Energy Study has been undertaken and how its findings relate to the council's Zero Carbon Roadmap.	
Recommendations	THAT THE COMMITTEE: (I) NOTE THE COMPLETION OF THE RENEWABLE AND LOW CARBON ENERGY STUDY; (II) NOTE THAT THAT THE RENEWABLE AND LOW CARBON ENERGY STUDY SUPPORTS THE FINDINGS OF THE ZERO CARBON ROADMAP IN RESPECT OF RENEWABLE ENERGY TARGETS; AND (III) NOTE THAT A FURTHER REPORT GIVING CONSIDERATION TO POSSIBLE POLICY OPTIONS WILL BE BROUGHT TO A FUTURE MEETING OF THIS COMMITTEE	

1. BACKGROUND

- 1.1 North West Leicestershire District Council made a climate change emergency declaration on 25th June 2019 which set out the council's commitment to support the Governments net zero target to 2050 and its aim to achieve carbon neutrality for the council's own emissions by 2030.
- 1.2 Following the council's climate emergency declaration, the Zero Carbon Roadmap and Action Plan for the district were commissioned and subsequently adopted in March 2020.
- 1.3 Whilst the Roadmap identifies the potentially significant role the Local Plan will have in terms of formulating policies that support the transition to zero carbon, the assessments that underpin the targets in the Roadmap are not necessarily robust enough for the purposes of the Local Plan. Therefore, additional evidence was commissioned from consultants (AECOM).

2.0 WHAT IS THE PURPOSE OF THE RENEWABLE ENERGY AND LOW CARBON ENERGY STUDY

- 2.1 The purpose of the Study is to produce evidence on the likely technical potential for different forms of renewable energy and low carbon energy in North West Leicestershire having regard to best practice, planning policy guidance, National Planning Policy and which will be sufficient to inform policies and/or targets in the new Local Plan.
- 2.2 The study sought advice on a number of matters as summarised below:
 - A technical assessment of the potential for renewable and low carbon energy generation within the district.
 - Identify other approaches (energy performance and design related) that could be used in the Local Plan to adapt to and mitigate climate change
 - In regards to new employment development, an assessment of the potential for including solar panels as part of new developments including the identification of any technical issues associated with such installations.
 - Establish whether there is potential for industry within the district to use Bio-Energy with Carbon Capture Storage (BECCS).
 - Establish the potential for introducing a Carbon Offset Fund, the mechanisms for doing so as well as identifying any potential associated viability issues.
 - An estimate of what the potential energy needs might be for new development to incorporate charging points for electric vehicles.
- 2.3 The study builds on previous analytical work such as the Renewable Wind Study undertaken in 2016, and local targets and commitments such as those laid out in the Zero Carbon Roadmap (2020).
- 2.4 The Renewable Energy Study assesses the findings of the Zero Carbon Roadmap and identifies whether there have been any significant changes since the Roadmap was published. The Roadmap provides context for the Renewable Energy Study.
- 2.5 The Study also provides a technical review of existing studies including the 'Low Carbon Energy Opportunities and Heat Mapping for Local Planning Areas Across the East Midlands: Final Report' (2011) produced by the Centre for Sustainable Energy (CSE), SQW and Land Use Consultants (referred to as the CSE study); The 2016 Renewable Wind Energy Study and associated constraint maps produced by ASC Renewables.
- 2.6 The Study identifies baseline data for fuel consumption, emissions, number of ultra-low emission vehicles (ULEVs), and electric vehicle charging points as well as low and zero carbon (LZC) installations within the district.

- 2.7 This study will form part of the technical evidence base to support the substantive review of the Local Plan.

3.0 STRUCTURE OF THE RENEWABLE ENERGY STUDY

- 3.1 The Renewable Energy Study is structured as follows:

- **Section 1: Introduction**, purpose and structure of the report
- **Section 2: Background and Context** provides an overview of some key drivers for introducing climate change mitigation measures such as building design standards, ultra-low emission vehicle (ULEV) infrastructure and Low and zero carbon (LZC) provision.
- **Section 3: Establishing the Baseline** describes the current baseline and recent trends in regard to fuel consumption, CO₂ emissions, ULEV uptake and LZC deployment in North West Leicestershire.
- **Section 4: Renewable Energy Assessment** presents the assessment of the potential to deliver additional LZC energy technologies in North West Leicestershire.
- **Section 5: Energy Performance and Design Approaches to Mitigate Climate Change** outlines various options for introducing higher performance standards in planning policy and describes sustainable design measures that could be implemented as best practice to contribute towards North West Leicestershire becoming a Zero Carbon District.
- **Section 6: Carbon Offset Fund** discusses the potential to establish a carbon offset fund for developers to make contributions in lieu of on-site carbon savings, outlining practical implications and potential next steps for NWLDC.
- **Section 7: Electric Vehicle Infrastructure Provision** provides a rough estimate of the potential change in fuel use that might arise due to ULEV uptake, along with broader commentary on future transport trends and actions that NWLDC can take to promote a shift towards sustainable transport modes.
- **Section 8: Conclusion** summarises key findings, recommendations, and next steps.
- Relevant supporting information is provided in the **Appendices**.

- 3.2 This report focuses on sections 4 of the Renewable Energy Study. A further report will be prepared for a future meeting of the Local Plan Committee when officers have had an opportunity to consider the Study in more detail.

4.0 RENEWABLE ENERGY ASSESSMENT (SECTION 4 OF THE STUDY)

- 4.1 As well as considering the potential to deliver additional LZC energy technologies in North West Leicestershire, a key component of the study was to review some of the LZC energy targets set out in the Zero Carbon Roadmap and assess whether they are likely to be achievable within the specified timescales.
- 4.2 The Roadmap itself identifies targets for both solar and wind energy generation within the district. The Renewable Energy Study supports the targets set out in the Roadmap and identifies that they could be exceeded. The key findings are presented in the table below.

Table 1: Achievability of the Targets set out in the Zero Carbon Roadmap

Technology	Zero Carbon Roadmap Target	Is the target considered achievable?	Comments
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Wind energy	Expand wind energy capacity to 75 MW by 2050	Yes	This target could potentially be exceeded
Solar Photovoltaics (PV)	Expand PV capacity to 140 MW by 2050	Yes	This target could potentially be exceeded
Hydroelectric power	Up to 3.2 MW based on five potential sites	See section 4.2.4 of the Study	This may be technically possible but would require detailed feasibility studies
Biogas	Expand use of biogas to 21 GWh by 2050	See section 4.2.7 of the Study	Not recommended based on present technologies

- 4.3 Overall, the Renewable Energy Study suggests that the targets in the Zero Carbon Roadmap for wind and solar energy are likely to be achievable. There may be opportunities to deliver hydropower in a small number of locations, but although these could potentially generate a large amount of electricity, this cannot be determined without site-specific feasibility studies. The use of biomass (either for combustion or conversion to biogas) is not recommended for widespread adoption at this time due to uncertainty related to the sustainability of the supply chain. It is considered likely that the main opportunities going forward will be solar PV, wind energy and heat pumps.

Solar PV

- 4.4 The Renewable Energy Study identifies that there is significant potential for both building-integrated and stand-alone PV installations within the district.
- 4.5 Roof-mounted PV, although not the cheapest way to generate renewable electricity, could be a key opportunity for North West Leicestershire, both because it arguably has a smaller visual impact on the wider landscape than large-scale PV or wind turbines, and because the total amount of roof space, considered cumulatively, is relatively large.
- 4.6 Estimates suggest that, based on the number of existing buildings and potential Local Plan development projections, it may be possible to install approximately:
- 81 MW of roof-mounted PV on existing buildings
 - 14 MW on new dwellings; and
 - 3.2 MW on new employment sites.
- 4.7 This would not require every square meter of roof space to be covered but is based on rules of thumb for the amount of typical roof area that is available for different building types.
- 4.8 Large non-domestic buildings, such as those that contain industrial facilities, can provide significant opportunities for installing roof-mounted solar energy technologies. The quantitative estimate in the Study suggests that, based on roof areas, orientation, and typical installation sizes, industrial buildings could theoretically accommodate more PV than all domestic buildings combined, despite there being far more domestic buildings.
- 4.9 Large-scale ground-mounted PV farms are among the most cost-effective ways of generating renewable electricity and can be installed more flexibly than many other LZC technologies. The study suggests that, this should be considered a key opportunity that can provide renewable energy for North West Leicestershire at a strategic scale.
- 4.10 As with building-mounted PV, from a planning perspective, visual impact is generally the key issue. Solar farms also have significant spatial requirements, which raises the issue of competing land uses. Therefore, the Government has recommended that priority should be given to installations on brownfield sites and lower grade agricultural land – or, alternatively,

that PV should be incorporated into the existing built environment (e.g. on the roofs of commercial and industrial buildings).

Wind

- 4.11 Onshore wind is currently one of the most cost effective LZC technologies available and could deliver a significant portion of the District's energy demands; however, it should be noted that this is currently somewhat restricted by national policies.
- 4.12 From a technical perspective, there is considerable potential for wind energy across the District. The Zero Carbon Roadmap sets a target of expanding from the current 3.3 MW capacity to 75 MW by 2050. However, a constraints-based assessment carried out by the Centre for Sustainable Energy (CSE) in 2011 assessed opportunities for commercial turbines of three different sizes, which in combination were found to offer up to 140 MW of capacity.
- 4.13 The Study suggests that this may be a conservative estimate. The 140MW figure is based on applying a 400-600m buffer around all residential properties, depending on the size of turbine, which is used as a proxy for addressing both safety concerns as well as amenity concerns (e.g. noise, shadow flicker, visual impact). Those factors are highly site-specific and can potentially be mitigated depending on site conditions, so in principle it may be possible to locate wind turbines closer to residential buildings in some cases.
- 4.14 The districts Wind Energy Opportunities Map produced as part of the Renewable Wind Energy Study (2016) only applied a safety buffer around residential properties. It indicates there is up to 191 km² of land area in the District that is 'potentially suitable' for medium and large-scale wind turbines, which likely represents a maximum theoretical limit. Using the rules of thumb set out in Department of Energy and Climate Change (DECC) (2010), which takes account of the need for spacing between turbines, if all of this land was used to deliver wind farms, this would offer over 1,700 MW of wind energy capacity - ten times more than the CSE estimate and far more than would be needed to meet the annual electricity demands of the District. It is important to note that this does not mean that it would be desirable, practical, or financially viable to deliver this amount of wind energy – only that there is, in principle, enough physical and spatial resource in the District to do so.
- 4.15 The Study identifies that the actual target figure could fall somewhere between these two estimates (140MW and 1,700MW), although probably would be closer to the CSE estimate when considering the need for wind energy developments to gain community support. However, the key point is that the available evidence suggest that the targets identified in the Zero Carbon Roadmap are potentially achievable.
- 4.16 Small-scale wind turbines can be installed on or near buildings, although they tend not to perform very well in urban areas where there is more disruption to wind flow. Therefore, it is usually assumed that these will be more suitable for rural locations where there are fewer obstacles and wind speeds are higher. They may also be suitable for industrial sites and business parks where there is less concern about visual impact.
- 4.17 Due to their lower output, small-scale turbines are significantly more expensive than large-scale turbines in terms of cost per unit of electricity generated. Furthermore, it would take dozens of smaller turbines to match the output of a single large-scale turbine, which would result in cumulative impacts. For these reasons, the study suggests that if wind energy is planned within North West Leicestershire, it may be preferable to install fewer, larger turbines.

Heat Pumps

- 4.18 Heat pumps are expected to be crucial for decarbonising the heat sector by 2050 as they can be powered with renewable electricity and operate with much higher efficiencies than either boilers or direct electric system.

- 4.19 A heat pump is a device that extracts heat from the natural environment (e.g. the air, ground or water), compresses it, and then uses it to provide space heating or hot water. Heat pumps do not generate heat or electricity, but instead *use* electricity to transfer heat from one place to another using refrigerant liquids.
- 4.20 At present, heat pumps offer the best opportunity to decarbonise the heat supply in North West Leicestershire; most new and existing buildings can, in principle, accommodate either an air or a ground source heat pump. Due to the efficiency of these technologies, their use can also help to mitigate against electricity price increases when compared with direct electric heating.

General

- 4.21 In relation to renewable energy the Study recommends that any policies relating to existing buildings should emphasise the importance of carrying out energy efficiency upgrades. The study suggests that the council should consider issuing a Local Development Order or extending permitted development rights for measures such as roof-mounted PV, air source heat pumps and external wall insulation to promote uptake. Officers will consider this matter further as part of the report to a future meeting of this Committee.
- 4.22 The Study also recommends that any guidance should emphasise the importance of following the energy hierarchy and, in particular, support a shift away from the use of gas boilers towards the use of low carbon heating systems. Guidance should also encourage applicants to undertake a whole-building approach to retrofitting, and in particular, to carry out condensation risk analysis if any changes are proposed that would impact either insulation or ventilation levels in the building. Again, this matter will be given further consideration by officers.

5.0 NEXT STEPS

- 5.1 The study provides an important evidence base to help inform the Local Plan review. In particular, it has established that the targets for renewable energy generation set out in the Zero Carbon Roadmap appear to be realistic. There is now a need to develop policies that can help support the achievement of these targets through the planning system, although it should be appreciated that the planning system is not the only means by which the targets will need to be addressed.
- 5.2 As outlined earlier in the report, the study also includes a range of recommendations on other aspects including the providing advice regarding a possible carbon offset fund and approaches to mitigation. A further report will be brought to this Committee setting out how the Local Plan might seek to address these issues.

Policies and other considerations, as appropriate	
Council Priorities:	Developing a clean and green district
Policy Considerations:	None
Safeguarding:	No issues identified
Equalities/Diversity:	An Equalities Impact Assessment of the Local Plan review will be undertaken as part of the Sustainability Appraisal.
Customer Impact:	No issues identified
Economic and Social Impact:	No issues identified at this stage
Environment and Climate Change:	The decision itself will have no specific impact. The Substantive Local Plan Review as a whole will deliver positive environmental and climate change benefits and these will be recorded through the Sustainability Appraisal.
Consultation/Community Engagement:	None
Risks:	A risk assessment of the review has been undertaken and is reviewed at the officer Project Board meetings.
Officer Contact	Ian Nelson Planning Policy and Land Charges Team Manager 01530 454677 ian.nelson@nwleicestershire.gov.uk

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LOCAL PLAN COMMITTEE – 31 MARCH 2021

Title of Report	HUGGLESCOTE & DONINGTON LE HEATH NEIGHBOURHOOD PLAN (SUBMISSION DRAFT) AND NEIGHBOURHOOD PLANNING UPDATE	
Presented by	Ian Nelson Planning Policy and Land Charges Team Manager	
Background Papers	National Planning Policy Framework	Public Report: Yes
	Planning Practice Guidance Hugglescote & Donington le Heath Neighbourhood Plan Local Plan Committee January 2020 - draft Hugglescote & Donington le Heath Neighbourhood Plan	Key Decision: No
Financial Implications	<p>The Hugglescote & Donington le Heath Neighbourhood Plan will incur direct costs to the District Council to support an independent Examination of the plan and, should the Examination be successful, a local referendum. Grant funding from central government (£30,000 per neighbourhood plan) is payable to the authority to support this agenda, but is unlikely to meet the costs in full.</p> <p>Once the neighbourhood plan is made it will form part of the Development Plan for North West Leicestershire. Should the document be subject to legal challenge, the District Council will be responsible for meeting such costs. Any such costs would need to be met from the contingency budget held by the Planning Service.</p>	
	Signed off by the Section 151 Officer: Yes	
Legal Implications	None from the specific content of this report.	
	Signed off by the Monitoring Officer: Yes	
Staffing and Corporate Implications	<p>The report highlights the staff resources required to support neighbourhood planning in the district. Much of this work is done within the Planning Policy team which is also responsible for the delivery of the Local Plan Review.</p> <p>Links with the Council's Priorities are set out at the end of the report.</p>	
	Signed off by the Head of Paid Service: Yes	
Purpose of Report	<p>A) To determine the District Council's response to the submission draft of the Hugglescote & Donington le Heath Neighbourhood Plan; and</p> <p>B) To provide a more general update on neighbourhood planning in the district.</p>	
Recommendations	<p>THAT THE COMMITTEE:</p> <p>1. AGREE THE PROPOSED RESPONSE TO THE SUBMISSION DRAFT OF THE HUGGLESCOTE & DONINGTON LE HEATH NEIGHBOURHOOD PLAN IN APPENDICES A AND B.</p>	

	<p>2. NOTES THAT THE STRATEGIC DIRECTOR OF PLACE, IN CONSULTATION WITH THE PORTFOLIO HOLDER FOR PLANNING & INFRASTRUCTURE WILL:</p> <p>A) PUBLISH THE PLAN FOR A SIX WEEK PERIOD AND INVITE REPRESENTATIONS;</p> <p>B) NOTIFY CONSULTATION BODIES; AND</p> <p>C) APPOINT AN INDEPENDENT EXAMINER TO CONDUCT THE EXAMINATION OF THE NEIGHBOURHOOD PLAN</p> <p>3. NOTES THAT, FOLLOWING RECEIPT OF THE INDEPENDENT EXAMINER'S REPORT, THE STRATEGIC DIRECTOR OF PLACE IN CONSULTATION WITH THE PORTFOLIO HOLDER FOR PLANNING & INFRASTRUCTURE WILL DETERMINE WHETHER THE CONDITIONS HAVE BEEN MET FOR THE NEIGHBOURHOOD PLAN TO PROCEED TO REFERENDUM;</p> <p>4. AGREES THAT , FOLLOWING THE REFERENDUM AND IF TIME DOES NOT ALLOW FOR A REPORT TO THIS COMMITTEE, THE STRATEGIC DIRECTOR OF PLACE IN CONSULTATION WITH THE PORTFOLIO HOLDER FOR PLANNING & INFRASTRUCTURE WILL DETERMINE WHETHER THE NEIGHBOURHOOD PLAN SHOULD BE 'MADE';</p> <p>5. NOTES THE PROGRESS BEING MADE WITH NEIGHBOURHOOD PLANS IN THE DISTRICT.</p>
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1. BACKGROUND

- 1.1 Neighbourhood planning was introduced under the Localism Act 2011 to give local communities a more hands-on role in the planning of their neighbourhoods. It introduced new rights and powers to allow local communities to shape new development in their local area. Neighbourhood Plans can be prepared by a parish or town council (or neighbourhood forums in areas not covered by a parish or town council) once they have been designated as a neighbourhood area by the district council.
- 1.2 Neighbourhood Plans should consider local and not strategic issues and must be in line with higher level planning policy. A Neighbourhood Plan can be detailed or general, depending on what local people want, and the plan's policies must;
- a) have regard to national planning policies and guidance;
 - b) contribute to the achievement of sustainable development;
 - c) be in general conformity with the strategic policies of the development plan; and
 - d) be in line with EU obligations and human rights requirements.
- 1.3 The district council as Local Planning Authority (LPA) has an important role to play in the neighbourhood plan process even though the council is not responsible for its preparation. The key stages in producing a neighbourhood plan, as governed by The Neighbourhood Planning (General) Regulations 2012 and The Neighbourhood Planning (General) (Amendment) Regulations 2015, are;

Regulation	Stage
Reg 6A	Designate a neighbourhood area
	Prepare a draft neighbourhood plan

Reg 14	Pre-submission publicity and consultation
Reg 15	Submit the neighbourhood plan to the LPA
Reg 16	Publicise the draft neighbourhood plan (6 week consultation)
Reg 17	Submit the draft plan for independent examination
Reg 18	Publish the examiner's report and decision whether the plan can go forward to referendum
Para 12, Sch 4B TCPA 1990	Referendum
Reg 19	Decision to 'make' the neighbourhood plan
Reg 20	Publicise the made neighbourhood plan

1.4 This report considers two matters:

- a) the district council's proposed response to the submission draft Hugglescote & Donington le Heath Neighbourhood Plan; and
- b) a more general update on neighbourhood planning progress.

2. HUGGLESCOTE & DONINGTON LE HEATH NEIGHBOURHOOD PLAN

2.1 The Hugglescote & Donington le Heath Neighbourhood Plan Area covers the whole of the parish and was designated in June 2017. The parish council consulted on a pre-submission version of the plan in November/December 2019 and the District Council's response to the plan agreed by Local Plan Committee on 15 January 2020 can be viewed via the following link; [Local Plan Committee January 2020 - draft Hugglescote & Donington le Heath Neighbourhood Plan](#). The parish council considered all the comments it received, amended the plan and it has now requested that the District Council organise formal consultation on the submission draft version to the plan and then submit it for Examination (Regs 15,16,17). This consultation has been arranged for a 6-week period from Friday 12 March – Friday 23 April. The draft submission version of the plan, and the supporting documentation, can be viewed on the District Council's website using the following link: [Hugglescote & Donington le Heath Neighbourhood Plan](#)

2.2 In overview, the neighbourhood plan policies cover the following broad areas;

- the location of new development including a specific policy for South East Coalville
- the design of new development
- housing mix, affordable housing and windfall development
- policies to protect the heritage and ecology of the parish, including the designation of areas as Local Green Space
- transport, including parking
- the protection of, and support for, community facilities
- the protection of employment premises and support for new small-scale employment development

2.3 It does not allocate any additional land for development.

2.4 Officers have reviewed the draft submission plan taking account of the comments that were made by this council at the previous stage. The schedule in Appendix A sets out those previous comments and identifies where changes have been made in response. The final column in the schedule identifies the outstanding matters which officers recommend form this council's response to the submission draft plan and which, in due course, will be considered by the Examiner. These matters are categorised as either an 'objection' or as a 'comment':

- an objection is made where an aspect of the plan is considered to be in conflict with one of the requirements listed in paragraph 1.2 above.
- a comment relates to a less fundamental aspect but which, if it were addressed, could improve the application of the plan's policies. It will be at the Examiner's

discretion whether he/she decides to take account of these points in his/her consideration.

- 2.5 The Committee is invited to consider these objections and comments and, with amendments as appropriate, to agree them as the council's response to the submission draft plan.

Next Steps

- 2.6 Subject to the Committee's decision, the response will be submitted before the consultation closing date. In the meantime, officers will be appointing an independent Examiner to conduct the neighbourhood plan examination. The appointment process will be done in consultation with the parish council.
- 2.7 At the close of the consultation, the neighbourhood plan documentation and any representations received will be sent to the Examiner. Neighbourhood plan examinations are usually undertaken by means of written representations but the Examiner could decide to hold hearings if the matters at issue are more complex. The Examiner will set out conclusions on the plan in an Examiner's Report.
- 2.8 Following receipt of the independent examiner's report, the District Council must formally decide whether to send the plan to referendum (with or without modifications proposed by the examiner or NWLDC). Reg 17A(5) of the 2016 Regs gives the District Council 5 weeks from receipt of the Examiners report to decide whether to proceed with the referendum or not. Given the short timescale, the Strategic Director of Place, in consultation with the Portfolio Holder for Planning & Regeneration will exercise the executive power of making this decision as delegated to them in the Constitution (paragraph 5.2.1 of the Scheme of Delegation). This is allowed for in the recommendations.
- 2.9 Should the plan be sent to referendum, and the referendum declares in favour of the Neighbourhood Plan, then the District Council is required to make (i.e. adopt) the plan within 8 weeks of the referendum (Reg 18A(1) of the 2016 Regs). The decision to adopt is an executive decision. If time permits then a report would be brought to a future meeting of this Committee first. However, in view of the timescales required to make such a decision, it is likely that this would be done by the Strategic Director of Place, in consultation with the Portfolio Holder for Planning & Infrastructure under the Scheme of Delegation.

3. NEIGHBOURHOOD PLANS UPDATE

- 3.1 In addition to Hugglescote & Donington le Heath, there is a considerable amount of neighbourhood planning activity elsewhere in the district.

Neighbourhood Plan Area Designations

- 3.2 Within the past 12 months, neighbourhood plan areas have been designated for the parishes of Breedon on the Hill (September 2020) and Long Whatton & Diseworth (October 2020). A designation request from Lockington and Hemington Parish Council is expected shortly.

Plan Preparation

- 3.3 In addition to Hugglescote & Donington le Heath, there are 4 Neighbourhood Plans currently in preparation.

Breedon on the Hill	The Parish Council has commenced work on building its evidence base with a view to undertake community engagement during the period of December 2020 to March 2021. Thereafter, the parish council has provided the following indicative timetable: August 2021: Pre-submission Neighbourhood Plan approved by
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	<p>the Parish Council</p> <p>September 2021 to December 2021: Consultation on the Pre-Submission Plan</p> <p>January 2022: Submission of the Neighbourhood Plan to North West Leicestershire District Council</p> <p>January–March 2022: 6-week consultation on the draft submission plan</p> <p>April –July 2022: Independent Examination</p> <p>September 2022: Neighbourhood Plan Referendum</p> <p>October 2022: North West Leicestershire District Council makes the Neighbourhood Plan</p>
Long Whatton & Diseworth	<p>The Parish Council has commenced work on building its evidence base with a view to undertake community engagement during the period of December 2020 to March 2021. Thereafter, the parish council has provided the following indicative timetable:</p> <p>August 2021: Pre-submission Neighbourhood Plan approved by the Parish Council</p> <p>September 2021 to December 2021: Consultation on the Pre-Submission Plan</p> <p>January 2022: Submission of the Neighbourhood Plan to North West Leicestershire District Council</p> <p>January–March 2022: 6-week consultation on the draft submission plan</p> <p>April –July 2022: Independent Examination</p> <p>September 2022: Neighbourhood Plan Referendum</p> <p>October 2022: North West Leicestershire District Council makes the Neighbourhood Plan</p>
Blackfordby	<p>Having completed a pre-submission (Reg 14) consultation in 2019, the town council has been advised that an Appropriate Assessment will be required. Consultants have been commissioned to prepare this as part of a Strategic Environmental Assessment but the work is still in preparation. The plan will be submitted to the District Council (under Reg 15) when this work is complete, along with any changes to the plan required as a result.</p>
Swannington	<p>The Swannington Neighbourhood Plan Area was designated in January 2019. The preparation of the draft Neighbourhood Plan is underway, supported by planning consultants. In line with national policy, in 2020 the Neighbourhood Plan steering group consulted NWLDC on an indicative housing figure for the area and is assessing potential sites for possible allocation in the plan. The steering group expects to carry out consultation on the draft Neighbourhood Plan (Reg14) in March/April 2021. Whilst there is no fixed timetable beyond this, it would be reasonable to expect the Neighbourhood Plan to be submitted to NWLDC for Regulation 15 consultation in summer/autumn 2021.</p>

- 3.4 Whitwick Parish Council is also understood to be considering whether to prepare a neighbourhood plan.
- 3.5 This level of local community activity is welcome and demonstrates a considerable local interest in, and commitment to, planning to shape local areas. Neighbourhood Plans are particularly valuable at providing a level of detail and local specificity which it is not possible to incorporate into a Local Plan. Members have also been keen to see neighbourhood planning supported and promoted.
- 3.6 Whilst many neighbourhood planning groups employ expert consultants to assist and guide the preparation of the plan, input from the officers from the Planning Policy & Land Charges team is also required at key stages, in particular:
- to designate the neighbourhood plan area

- to undertake Strategic Environmental Assessment/Habitat Regulations Assessment Screening and to consult on this with expert consultees
 - to check the submission documentation is in order
 - to organise consultation on the submission draft plan (Reg 16)
 - to prepare NWLDC comments at Reg 16 stage
 - to organise the examination, including the appointment of the Examiner
- 3.7 Additionally, the team can be asked:
- to provide mapping for the neighbourhood plan area
 - to advise on consultation contacts, the content of the pre-submission plan (Reg 14) and Reg 15 plan
 - to give presentations to groups considering whether to prepare a plan
- 3.8 Importantly, neighbourhood plan work does not only impact on the Planning Policy & Land Charges team. Democratic Services have responsibility for organising neighbourhood plan referenda, whilst the Community Focus team provide advice about, and promote, Neighbourhood Plans to local communities. Depending upon the specific policies and proposals in a Neighbourhood Plan it may also be necessary to seek input from other council services, for example Strategic Housing.
- 3.9 Ultimately the District Council does not have any control over the timetable for the various Neighbourhood Plans; this is in the gift of the Neighbourhood Plan groups. This means that officers are having to be reactive and from a resource point of view this can then result in a conflict between assisting and progressing neighbourhood plan work and other core work of the Planning Policy team, namely the Local Plan Review. In view of this, together with an increase in work at a strategic (i.e. Leicester and Leicestershire) level and the impact of the covid-19 pandemic, consideration is currently being given to the issue of resources in the Planning Policy team to provide additional capacity in the short to medium term, particularly in respect of the Local Plan Review.

Policies and other considerations, as appropriate	
Council Priorities:	<p>The preparation of Neighbourhood Plans can impact on any and all of the council priorities:</p> <ul style="list-style-type: none"> • Supporting Coalville to be a more vibrant, family-friendly town • Our communities are safe, healthy and connected • Local people live in high quality, affordable homes • Supporting businesses and helping people into local jobs • Developing a clean and green district
Policy Considerations:	Adopted North West Leicestershire Local Plan National Planning Policy Framework
Safeguarding:	None specific
Equalities/Diversity:	None specific
Customer Impact:	None specific
Economic and Social Impact:	Neighbourhood Plans in general can deliver positive economic and social impacts for local communities as part of their wider objective to achieve sustainable development. The Hugglescote & Donington le Heath Neighbourhood Plan specifically contains policies that will help support the local economy, local community facilities and the provision of affordable housing amongst other things.
Environment and Climate Change:	Neighbourhood Plans can also deliver positive environmental and climate change benefits as part of their wider objective to achieve sustainable development. The Hugglescote & Donington le Heath Neighbourhood Plan specifically contains policies that will help conserve biodiversity and heritage assets in the parish and will potentially enable additional EV charging points.
Consultation/Community Engagement:	Neighbourhood Plans are subject to at least 2 stages of public consultation.
Risks:	The proposed response in Appendices A and B identify that, in a limited number of instances, the neighbourhood plan is considered to be in conflict with policies in the adopted Local Plan. Bringing this to the attention of the independent Examiner enables him/her to assess these matters and to reach a reasoned conclusion. This will bring clarity for all users of the plan in the future.
Officer Contact	<p>Ian Nelson - Planning Policy and Land Charges Team Manager 01530 454677 ian.nelson@nwleicestershire.gov.uk</p>

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APPENDIX A

NWLDC OFFICER RESPONSE TO PRE-SUBMISSION DRAFT HUGGLESCOTE AND DONINGTON LE HEATH NEIGHBOURHOOD PLAN

Reg 14 Plan: Section/Policy Number	Reg 14 Plan: Planning Officers' and Conservation Officer's Responses	Reg 15 Plan: Page number and Commentary	Reg 15 Plan: Objections/Comments
Brief history of the parish	<p>Conservation Officer: Page ten contains a 'brief history' of the parish. It contains no reference to the shrunken medieval village of Snibston.</p> <p>Paragraph one says that "the first written record ... is to be found in the Domesday Book, with reference to Donington manor". It would be useful to note that Hugglescote does not appear in the Domesday Book and that the first chapel-of-ease at Hugglescote was erected in the late fourteenth century (Moore, 2005).</p> <p>Paragraphs three and four appear to quote at length from a Victorian trade directory but the source is not credited. Paragraph four contains population figures for the 'township' and 'ecclesiastical parish' that do not agree with the figures on page 11. If these figures are 'historic' then this should be made clear.</p> <p>Paragraphs four and seven refer to the Church of St John the Baptist. The</p>	<p>Page 10: No change made.</p> <p>Whilst these refinements and additions could have been beneficial, their exclusion is not considered to be fundamental to the effectiveness of the plan.</p>	None

Reg 14 Plan: Section/Policy Number	Reg 14 Plan: Planning Officers' and Conservation Officer's Responses	Reg 15 Plan: Page number and Commentary	Reg 15 Plan: Objections/Comments
	<p>paragraphs repeat and contradict each other. Paragraph four says that the church was built in 1879 in the Franco-Norman style but paragraph seven says that it was built in 1878 in the English Geometrical Decorated style.</p> <p>Page 26 describes Hugglescote as a "nineteenth-century expansion of Coalville based on a medieval village" but page ten makes no reference to this expansion.</p> <p>Paragraph four says that "the manor belonged to Lord Donington and is now part of Leicestershire Museums". This paragraph appears to confuse the manor (lower case) with the Manor House (upper case). The Hastings family were lords of the manor (Charles Hastings was created Lord Donington in 1880) but the soi disant Manor House was owned by the Osgathorpe Charity (now part of Thomas Charley's Charities). It may be interesting to explore the connection between the Manor House, the Osgathorpe Charity and the former Grammar School, which succeeded the Free Grammar School at Osgathorpe.</p> <p>Paragraph six says that Hugglescote and Donington "were part of the parish</p>		

Reg 14 Plan: Section/Policy Number	Reg 14 Plan: Planning Officers' and Conservation Officer's Responses	Reg 15 Plan: Page number and Commentary	Reg 15 Plan: Objections/Comments
	of Ibstock until 1878, when they were formed into a separate civil parish". It says that "in 1936 the parish was absorbed by the urban district of Coalville". This paragraph appears to confuse the civil parish and the ecclesiastical parish. Our rapid appraisal says that Hugglescote "was anciently a township in Ibstock parish" but it was administered by Coalville urban district council from 1894. Kelly (1891) describes Hugglescote as a township in Ibstock parish; Kelly (1899) describes it as a township in Coalville urban district.		
Vision	Conservation Officer: On page 14 the 'vision' refers to the area's "proud industrial heritage" but none of the sites identified in figure 7.1 or in policy ENV4 are industrial heritage sites.	Page 14: No change. Whilst these refinements and additions could have been beneficial, their exclusion is not considered to be fundamental to the effectiveness of the plan.	None
General (page 16) 3 rd paragraph under methodology	Might be appropriate to quote what the NPPF says (page 49). NPPF refers to valued landscapes and recognising the "intrinsic character and beauty of the countryside" rather than protecting the countryside per se.	Page 15: Suggested addition made	None
Planning issues which matter to the community	Conservation Officer: Page nine contains a bullet list of seven "planning issues [that] matter most to the community", including the protection of "buildings and structures of historic and architectural interest". Page	Page 14: Second list removed from Reg 15 version.	None

Reg 14 Plan: Section/Policy Number	Reg 14 Plan: Planning Officers' and Conservation Officer's Responses	Reg 15 Plan: Page number and Commentary	Reg 15 Plan: Objections/Comments
	fourteen contains a bullet list of eight "policy issues identified by the community as being of special importance"; this list does not refer to heritage assets. It is not clear how the bullet lists relate to each other.		
Figure 2a Limits to development (page 17)	It would help if this showed all of the area covered by the Neighbourhood Plan. The inclusion of additional land south of The Green Donington le Heath which has planning permission and is not included in the adopted Local Plan is noted.	Page 17: In addition to land south of The Green, the Limits to development differ from the adopted LP – see map extracts in Appendix B	Objection – the Limits to Development map needs to be produced at a larger scale. There are at least two places where the LtD are different from those in the NWLLP (and where this difference is not because a site has subsequently got planning permission). Extracts showing these differences are included in Appendix B. Reason – to give confidence when determining planning applications (National Planning Policy Guidance (NPPG) Paragraph: 041 Reference ID: 41-041-20140306).
South East coalville Deelopment Scheme (page 17)	Planning permission is in place for all of south east Coalville. The latest housing trajectory identifies that 2,236 dwellings will be built by 2031. It is not clear if the reference to 1,900 dwellings is only that part of the site that is within the plan area?	Page 17: Amendment made.	None
Policy G2 (South East Coalville	The reference to figure 2b is slightly misleading as it suggests that all of the	Done	None

Reg 14 Plan: Section/Policy Number	Reg 14 Plan: Planning Officers' and Conservation Officer's Responses	Reg 15 Plan: Page number and Commentary	Reg 15 Plan: Objections/Comments
Development Scheme) (page 19)	area shown on figure 2b is in the plan area. It would be helpful to delineate in some way that part that is within the plan area.		
The approach to future residential growth (page 20, 1st paragraph)	Unclear what the Leicester Housing Market Assessment (2017) is.	Page 19 of the Reg15 plan reads: "It was published in January 2017 and revealed an increase in housing need from earlier projections and this has since increased further by local issues including the 2009 Leicester and Leicestershire Strategic Housing Market Assessment which has identified Leicester City as being unable to accommodate its own housing need requirement based on the HEDNA figures. The LLEP have also signed a "memorandum of understanding" committing all the relevant local planning authorities to collectively delivering this housing need to 2031".	Comment – this section has some inaccuracies and, in any event, the position on Leicester unmet needs, Government changes to the standard methodology and progress with the SoCG are all subject to change and are more matters for the Local Plan Review than for this neighbourhood plan. A straightforward response would be to delete it from the plan as follows; "It was published in January 2017 and revealed an increase in housing need from earlier projections. and this has since increased further by local issues including the 2009 Leicester and Leicestershire Strategic Housing Market Assessment which has identified Leicester City as being unable to accommodate its own housing need requirement based on the HEDNA figures. The LLEP have also signed a "memorandum of understanding" committing all the relevant local planning authorities to

Reg 14 Plan: Section/Policy Number	Reg 14 Plan: Planning Officers' and Conservation Officer's Responses	Reg 15 Plan: Page number and Commentary	Reg 15 Plan: Objections/Comments
			collectively delivering this housing need to 2031"
Policy G3 (Design) (pages 20/21/22)	<p>a) Provision of insulation is not a matter considered through the planning system</p> <p>b) The requirement for a Design and Access Statement for all developments of more than 1 dwelling conflicts with the Planning Practice Guidance. Such a requirement only applies in areas designated as a World Heritage Site or conservation area (see link below).</p> <p>d) would it be worthwhile also including links to Bardon employment area?</p>	<p>Page 20: Insulation has been deleted.</p> <p>Requirement for a Design and Access Statement (DAS) has been removed but the policy now states "b) 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;"</p> <p>Bardon employment area included</p>	<p>None</p> <p>Objection – The District Council fully supports the neighbourhood plan's commitment to good design however the requirement to 'illustrate' in Policy G3(b) is considered overly onerous for small scale schemes as this will presumably require the submission of some form of design analysis. More effective wording which could be applied in the development management process would be "b) All new proposals for developments of more than one unit should not cause an adverse negative impact on the local beauty of the countryside".</p> <p>Reason – to give confidence when determining planning applications (NPPG Paragraph: 041 Reference ID: 41-041-20140306).</p>

Reg 14 Plan: Section/Policy Number	Reg 14 Plan: Planning Officers' and Conservation Officer's Responses	Reg 15 Plan: Page number and Commentary	Reg 15 Plan: Objections/Comments
	<p>h and i) Are these the same points expressed differently?</p> <p>p) Is the reference to two bed properties necessary as they are also caught by being in the "three bedrooms or less " category in the second part of this criteria.</p> <p>q) First part does not make sense as worded. Should the last word be 'supported' rather than 'promoted'?</p> <p>r) The aspiration for this [EV charging points] is supported, but there is currently no national requirement for universal vehicle charging points. It is also not clear as to whether this is technically feasible at the present time.</p> <p>Conservation Officer: Policy G3 is two pages long and contains twenty sub-policies. The headline policy says that development should "reflect the character and context of existing development". Good design is about more than being "sympathetic to local character". Chapter 12 of the NPPF and Local Plan policy D1 recognise</p>	<p>i) deleted</p> <p>p) done</p> <p>amended</p> <p>Reg 15 plan has retained this requirement for EV charging points "all properties of three bedrooms or less should be provided with an electric vehicle charging point. All properties of four or more bedrooms should be provided with at least two connections where viable and appropriate to do so;"</p> <p>No change.</p> <p>Whilst these refinements and additions could have been beneficial, their exclusion is not considered to be fundamental to the effectiveness of the plan.</p>	<p>Comment – the aspiration to increase the availability of EV charging points is supported however the policy may exceed NPPF requirements which states that development should "be designed to enable charging of plug-in and other ultra-low emission vehicles in safe, accessible and convenient locations" (paragraph 110).</p> <p>None.</p>

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	<p>other aspects of good design; some of these aspects are reflected in policy G3's sub-policies. The headline policy should be amended to reflect these other aspects. The NPPF says that "neighbourhood plans can play an important role in identifying the special qualities of each area and explaining how this should be reflected in development" (paragraph 126). It is a pity that the draft plan does not do this.</p> <p>Policy G3 contains eight sub-policies that relate to "character and context" (sub-policies (b) and (c) and sub-policies (h) to (m)). Considering the length of policy G3 I would recommend that the Parish Council split policy G3 into two separate policies, the first referring to "character and context" and the second referring to other aspects of good design. The headline policy says that development should "reflect the character and context of existing development" but supports "contemporary and innovative materials and design" in some circumstances. The headline policy is contradicted by sub-policy G3(b), which says that "all development will enhance and reinforce the local character" but makes no allowance for "contemporary and innovative" design.</p>		

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	<p>Sub-policies G3(a), G3(f), G3(g) and G3(q) refer to “green technology” and “sustainable design”. I am pleased that these sub-policies have been included – they reflect Local Plan policy D1(5) – but the sub-policies are repetitive and sub-policy G3(f) does not appear to constitute a policy.</p> <p>Sub-policies G3(h) and G3(i) refer to the “diversity” of new development. Sub-policy G3(i) says that “within each development the housing should not be the same in appearance”. Parts of the parish (e.g. the “nineteenth-century expansion of Coalville”) exhibit a great degree of uniformity and in these contexts uniform development would be “sympathetic”.</p> <p>Sub-policies G3(p) and G3(r) refer to parking and electric vehicle charging. These sub-policies appear more relevant to chapter D “Transport and access”.</p> <p>Finally I am disappointed that policy G3 makes no reference to the creation of safe places. For instance please refer to NPPF paragraph 127(f) and Local Plan policy D1.</p>		
The approach to future residential growth (page 20, 1 st	Unclear what the Leicester Housing Market Assessment (2017) is.	Page 20: See above	None

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paragraph)			
Policy H1 (Housing Mix) (page 23)	<p>4th paragraph. It would be helpful to also include the HEDNA recommendations for the mix of affordable housing alongside the market housing mix rather than later on.</p> <p>The housing needs report which accompanies the Neighbourhood Plan identifies (Table 5) that the proportion of 4 or more bedroomed properties (20.4%) are somewhat greater than the North West Leicestershire average (23.5%). Whilst it is recognised that there is some evidence of under occupancy, it is considered that the evidence does not support the approach set out in respect of larger homes.</p> <p>It would be helpful if some support was to be given for the provision of 1-bed</p>	<p>Page 23: Whilst these refinements and additions could have been beneficial, their exclusion is not considered to be fundamental to the effectiveness of the plan.</p> <p>Save for a wording change, the general approach to larger properties hasn't been changed.</p> <p>Done</p>	<p>None</p> <p>Comment - The Housing Need Report shows that the parish has broadly a similar profile of dwelling sizes to that for NWL as a whole (Table 5). The proportion of 2 bed properties is marginally higher in the parish compared with the district whilst the proportion of 4/5 beds is marginally <u>lower</u> but in neither case is the variance significant. Similarly the level of under occupation is lower than for the district (Table 6); 62.9% of the 4 bedroom homes in the parish are occupied by households of 3 or more people whilst the equivalent figure for the district is 56.5%. In these circumstances, it is considered that the evidence does not clearly justify an aim to limit the proportion of 4 bed properties.</p> <p>None</p>

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	<p>market properties as well, otherwise developers assume they can provide them as affordable units only. This would provide a better mix as suggested in the HEDNA.</p> <p>It is not clear what is meant by the term "any single site" in the policy. Does it refer to an application site? What if the application site is a phase of part of a larger development?</p>	<p>Done Altered wording</p>	<p>None</p>
Policy H2 (Affordable Housing) (page 24)	<p>3rd paragraph – the Local Plan requirement for affordable housing in Hugglescote and Donington-le-Heath is 20% as they fall within the Coalville Urban Area.</p> <p>5th paragraph – since the HEDNA was produced a new NPPF has been published which includes a requirement that 10% of new homes be available for low cost home ownership (paragraph 64). Presumably this would form part of the 20% 'low cost starter homes or other home ownership products' quote in the policy. The use of the term 'intermediate housing' no longer appears in the definition of affordable housing in the NPPF glossary. It is noted that the proposed policy does not use this term, but it would be useful to explain why this is.</p>	<p>Page 24: Done</p> <p>No change</p> <p>The 20/80 tenure split which is referred to in Policy H2 is not referenced in the affordable housing policy in adopted Local Plan. It is nonetheless based on the HEDNA and is therefore evidence-based so its inclusion in Policy H2 is justified.</p>	<p>None</p> <p>Objection – The policy states "Where possible, new affordable housing within the Plan area shall be made available to eligible households with a connection to the Plan area". It is proposed that this requirement for a local connection should be deleted from the policy for the following reasons; a) it does not accord with the affordable housing eligibility criteria applied by the district council's Housing team. The criteria require a connection to the district, not to the local area; and b) it is not in general conformity with Policy</p>

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	It should be noted that for the South East Coalville development area, the provision of affordable housing has already been agreed. The policy could only be applied to any additional development that comes forward within the parish.	No change	<p>H4 of the adopted Local Plan which includes no such local connection requirement.</p> <p>On a practical level, a consequence of a local connection requirement is that people in housing need who come from places with no/limited new development would never have their needs met. Local connection requirements can also constrain Registered Providers' ability to secure funding for new affordable housing schemes.</p> <p>It is proposed that the requirement should be deleted from Policy H2 as follows; "Where possible, new affordable housing within the Plan area shall be made available to eligible households with a connection to the Plan area."</p> <p>Reason – the policy as worded would not be in general conformity with the strategic policies of the adopted Local Plan.</p>
Policy H3 (Windfall Sites) (Page 25)	In g) it would be helpful to make it clear that it is the occupiers of the "proposed dwelling" which is being referred to.	Page 24: Policy H3 appears to limit windfall sites to up to 5 dwellings	Objection – Policy H3 appears to limit windfall sites to up to 5 dwellings. The supporting text explains that this is to avoid

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	<p>It would be useful to consider including a further requirement as there may be instances where a site of up to 5 dwellings satisfies the floorspace requirement of the adopted Local Plan policy. Suggest something like "where the requirement for an affordable housing contribution is triggered against the local plan affordable housing policy, that such provision is to be made"</p>	Done	<p>making traffic and parking issues in Hugglescote worse. Infill or redevelopment of more than 5 dwellings can be acceptable if the site allows and parking and highways impacts will be assessed as part of a planning application. There is considered to be insufficient evidence to justify the proposed limit and it is also inconsistent with the definition of 'windfall site' in Annex 2 of the NPPF which does not include a numerical limit.</p> <p>It is proposed that Policy H3 be amended to read; "Proposals for infill and redevelopment sites (individual dwellings or small groups of dwellings of up to 5) will be supported where:...".</p> <p>Reason – consistency with national policy (NPPF Annex 2) .</p>
Policy H4 (Support to be given to brownfield sites) (Page 25)	<p>What is meant by redundant land? Would it include land no longer used for agricultural purposes? The policy could include a cross reference to the definition of previously developed land as set out in the NPPF. For example,</p> <p>Within the Limits to Development, proposals for the redevelopment or</p>	<p>Page 25</p> <p>Done</p>	None

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	change of use of redundant land or buildings (<u>which satisfies the definition of previously developed land as set out in the NPPF or any successor document</u>) will be supported, unless it conflicts with policies in the Development Plan.		
Natural & Historic Environment	<p>Conservation Officer: The parish of Hugglescote and Donington-le-Heath contains eight listed buildings including the grade II* listed Manor House at Donington and the grade II* listed parish church at Hugglescote. Pevsner (1984) describes the latter as “easily the best C19 church [in Leicestershire] outside Leicester”. The parish contains two conservation areas and five identified local heritage assets. These include the former National School (1862) and the former Grammar School (1909) as well as three buildings in the Hugglescote conservation area. In 2017 we adopted a rapid appraisal to support the designation of the Hugglescote conservation area.</p> <p>I am pleased that heritage is important to the Parish Council. For instance the foreword refers to “the importance of retaining our heritage”; the ‘background’ says that protection of “buildings and structures of historic and architectural interest” is one of</p>	Page 26 onwards: Conservation Officer: The NP should pay greater attention to Snibston deserted medieval village and an area of ridge and furrow that has “a clear association with contemporary settlement remains”.	Comment: The plan should pay greater attention to Snibston deserted medieval village and an area of ridge and furrow to the immediate south-west of the deserted village (please see the image at the end of this note). This area of ridge and furrow has been in meadow cultivation since before the year 2000 and it has “a clear association with contemporary settlement remains”. This area does not appear on figure 9.3 of the NP.

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	<p>seven planning issues that “matter most to the community”; the ‘vision’ refers to the need to “balance the distinct heritage of the parish” (although it does not say what it should be balanced against). The subchapter “natural and historic environment” accounts for one-third of the draft plan. Hence it is a pity that the draft plan makes no reference to conservation areas and contains no policy relating to development affecting conservation areas. It is a pity that it contains no policy relating to development affecting the settings of listed buildings. It is a pity that it contains no reference to the District Council’s list of local heritage assets and no reference to the shrunken medieval village of Snibston.</p>		
Donington Fields	<p>Conservation Officer: Page 27 contains two paragraphs of text entitled “historic environment”. The text does not appear to refer to the historic environment but instead refers to “the agricultural land known locally as ‘Donington Fields’”. The text says that “this is an important environmental and recreational area” but the draft plan does not refer to it as a heritage asset. The fields are not identified on figure 7.1 “sites of historic environment significance” or in policy ENV4 “local heritage assets”. Figure 11.3 indicates that one of the fields contains well</p>	<p>Page 29: No change.</p> <p>Whilst these refinements and additions could have been beneficial, their exclusion is not considered to be fundamental to the effectiveness of the plan.</p>	None

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	preserved ridge-and-furrow.		
Destroyed features	Conservation Officer: Page 28 refers to the "site of the Manor House bank-and-ditch" and describes this as a "feature of high historical and archaeological significance". Policy ENV4 refers to the site of a cruck framed house and describes it as a "local heritage asset ... important for [its] contribution to the village". These features have been destroyed.	Page 29: No change. The parish council notes that the sites of these features are 'still valued'. Whilst these refinements and additions could have been beneficial, their exclusion is not considered to be fundamental to the effectiveness of the plan.	None.
Environmental Inventory (Page28)	Last sentence on page 28 refers to ' <i>National Planning Policy Framework 2018</i> ' should this be 2019?	Page 28: Done	None
Environmental Inventory (Page 29)	The use of a scoring system to assess sites for designation as Local Green Space is questioned. In particular in assessing Accessibility as the Planning Practice Guidance states that land can be considered for designation as Local Green Space even if there is no public access. Therefore, sites with public access should not score higher than those with no public access. Also in terms of the 'bounded' criteria this appears to consider whether sites have some form of boundary i.e that they are not extensive tracts of land. In terms of the criteria set out in the NPPF there is no requirement for sites to have a specific boundary. This	Page 30 onwards: No change to the scoring system. See below.	See below (response to Policy ENV1)

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	criteria may need re-wording.		
Policy ENV1: Protection of Local Green Space (Page 30)	<p>A scoring system has been used to assess green spaces within the Neighbourhood Plan Area that could be designated as Local Green Space. The scoring system is based on the Local Green Space criteria as set out in the NPPF. The six sites included in Policy ENV1 are those with the highest overall score.</p> <p>Our interpretation of paragraph 100 of the NPPF (2019) is that sites only need to meet one of the criteria: beauty, historic significance, recreational value, tranquillity or richness of its wildlife. The scoring system used appears to require sites to meet a number of the criteria in order to achieve a high overall score. This would appear to be more onerous than the requirements of the NPPF. Policy ENV1 identifies 6 sites that are to be designated as Local Green Space. Appendix 5 appears to suggest that sites which score 24 or more should be designated as Local Green Space. However, Appendix 5 details numerous additional sites that score 24 or more and would therefore meet the scoring requirement to be designated as Local Green Space. It is not clear as to why these other sites have been excluded. These 'other'</p>	Page 30 onwards: No change to the scoring system.	<p>Objection - Policy ENV1 identifies 6 sites that are to be designated as Local Green Space. Appendix 5 appears to suggest that sites which score 24 or more should be designated as Local Green Space. However, Appendix 5 details numerous additional sites that score 24 or more and would therefore meet the scoring requirement to be designated as Local Green Space. It is not clear as to why these other sites have been excluded; they may also meet the criteria in paragraph 100 of the NPPF.</p> <p>These 'other' high scoring sites have been identified in Policies ENV2 and ENV3 which appears to create a hierarchy of protected sites based on what Local Green Space criteria they score the highest in. The methodology could be better explained and this approach may be overly complicated and add unnecessary tiers of designations.</p> <p>Reason – consistency with national policy (NPPF paragraph</p>

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	<p>high scoring sites have been identified in Policies ENV2 and ENV3 which appears to create a hierarchy of protected sites based on what Local Green Space criteria they score the highest in. The methodology could be better explained and this approach may be overly complicated and add unnecessary tiers of designations.</p> <p>Unclear what “<i>exceptional circumstances</i>” might be, therefore it may be worth detailing what is meant by this.</p> <p>Table 2 Page 31 Hugglescote Cemetery, there is an additional 3 in the History criteria column.</p>	<p>Policy ENV1 now uses the term ‘very special circumstances’ which is the terminology used in the NPPF with respect to Green Belt and was supported by the Ellistown Neighbourhood Plan Examiner.</p> <p>Done</p>	<p>100).</p> <p>None</p> <p>None</p>
Policy ENV2 - Sites of environmental significance (page 35)	See the comment under EV1 re the scoring system for the Local Green Space designation	Pge 32: See above	<p>See above</p> <p>Objection: some of the sites shown on Figs 5.1 & 5.2 have planning permission for housing and they cannot be protected from development in the way Policy ENV2 intends. Consideration should be given to removing the following sites from Figs 5.1 & 5.2; Fig 5.1: Area MLE4559 coincides with planning</p>

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			<p>permission 13/00956/OUTM (residential development of up to 2,700 dwellings) and 18/0034/REMM (49 dwellings). Fig 5.2: the pre-2009 LWS to the west of Station Road coincides with 18/0599/OUTM (9 dwellings). Reason – to give confidence when determining planning applications (NPPG Paragraph: 041 Reference ID: 41-041-20140306).</p> <p>Objection: parts of the sites identified as Local Green Space in Policy ENV1 (Donington Fields; cemetery) are also protected but with different policy criteria in Policies ENV2 and ENV3. Consideration should be given to whether this is necessary and appropriate.</p> <p>Reason – to give confidence when determining planning applications (NPPG Paragraph: 041 Reference ID: 41-041-20140306).</p>
Figure 7.1 (page 36)	<p>The key is not clear in the title for the figure, it would be easier to see if it followed the format of figure 7.2</p> <p>The purple features are very difficult to see unless very zoomed in, if this is</p>	Done	None

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	being used as a paper copy then it could help the reader to label the features .		
	Conservation Officer: Page 38 refers to listed buildings and says that development should "take into account their settings as defined (on a case-by-case basis) by Historic England". This makes no sense. Historic England has defined the term 'setting' but it is not responsible for defining the settings of listed buildings "on a case-by-case basis".	Change made.	None.
Important Open Space (page 37)	Sentence states that 'This policy is in general conformity with NWLDC Adopted Local Plan (2017) Policy IF3 (4-6)' - unsure if this sentence is needed as only part of the Neighbourhood Plan Policy refers to the Loss of Open Space which is what is referred to in the Local Plan Policy IF3 parts 4-6.	Has been deleted	None
Policy ENV3: Important Open Spaces (page 37)	<p>Policy ENV3 refers to the loss of open space. This is already included in Policy IF3 of the adopted Local Plan. The Neighbourhood Plan is not required to repeat this.</p> <p>The wording of Policy ENV3 could be made clearer. The Policy identifies sites that are to be protected as Important Open Spaces therefore it is</p>	<p>Page 33: No change. Local Plan Policy IF3 is limited to the loss of sites within the LtD whereas ENV3 additionally applies to sites outside the LtD so the neighbourhood plan policy does not simply replicate IF3.</p> <p>This section has been omitted.</p>	<p>None</p> <p>None</p>

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	unclear what is then meant by 'through confirmation as exisiting or designation as new, Open Space, Sport and Recreation (OSSR) sites in appropriate typologies'. Unclear as to what the typologies are and how they have been applied as they have not been applied to all of the sites. An explanation in the supporting text would be useful.		
ENV4 – Local Heritage Assets	Conservation Officer: Page 39 says that the NPPG “confirms the ability of neighbourhood plans to identify non-designated heritage assets”. The NPPG says that “there are a number of processes through which non-designated heritage assets may be identified, including the local and neighbourhood plan-making processes”. It also says that “it can be helpful if LPAs keep a list of local heritage assets, incorporating any such assets that are identified by neighbourhood planning bodies”. Historic England (2016) Local heritage listing says that “work in preparing a neighbourhood plan may indicate buildings and sites that merit inclusion on the local list” but recommends that “final ratification” of a local list should be “sought at the appropriate level within the LPA”.	Page 36: The council's Conservation Officer continues to have concerns about this policy. A 'local heritage list' is the responsibility of the local planning authority. Policy ENV4 should avoid references to 'heritage assets' which is defined in the NPPF as “assets identified by the local planning authority” (Annex A). The Conservation Officer also has concerns about the robustness of the process to identify the assets and the method for review. The NPPG confirms that “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”. The Examiner for the Ellistown	Objection – the policy should avoid reference to local heritage assets as it is the responsibility of a local planning authority to identify them (see the definition of 'heritage asset' in NPPF Annex A) albeit they can come to light through the neighbourhood plan process. This helps to ensure that inclusion on a local heritage list is based on sound and consistent evidence and criteria. The Examiner for the Ellistown and Battleflat Neighbourhood Plan considered a similar issue. and the following proposed changes to the first sentence of Policy ENV4 correspond with his recommended wording. “POLICY ENV 4: LOCAL HERITAGE ASSETS –The structures and buildings listed

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	<p>In conclusion a neighbourhood plan should not contain a list of local heritage assets, but the plan-making process ("the work in preparing a neighbourhood plan") may identify non-designated heritage assets and the LPA may subsequently include these assets on a local list.</p> <p>Page 39 says that the County Council "has identified five buildings and structures ... that are considered to be of local significance". The draft plan does not say when or how this work was carried out or which buildings and structures were identified. I suspect this is a reference to the District Council's adopted list of local heritage assets. Page 39 says that "recent research for the Parish Council has identified a further seventeen buildings and structures of similar local heritage significance". Again the draft plan does not say when or how this work was carried out and I suspect that the "research" is based substantially upon our draft list of local heritage assets, which was prepared in 2017. The Parish Council should credit the District Council for the work that it has carried out.</p> <p>Figure 7.1 indicates "sites of historical [sic] environment significance". It</p>	<p>and Battleflat Neighbourhood Plan considered a similar issue and recommended changes to the plan as a result.</p>	<p>here (map Figure 10) are local heritage assets. <u>Development proposals that affect the buildings and structures listed below, or their setting, will be expected to conserve the significant features which make them important.</u> They are important..."</p> <p>Reason – to ensure consistency with the NPPF (Annex A).</p> <p>Comment - Policy ENV4 identifies 17 local heritage assets. Appendix 7 says that identification is "at the discretion of the list author"; the list includes assets "of archaeological, historical or architectural interest" or "likely to be of interest to people of the parish". The council considers that these criteria are somewhat vague and lack transparency.</p>

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	indicates no more than twenty sites so it should be feasible to list the sites in the text (see policy ENV3). Figure 7.1 depicts earthwork remains at Hugglescote Grange and Snibston in a manner that differs substantially to our draft list of local heritage assets (see attached). At Snibston the Historic Environment Record notes that "most earthwork remains have been ploughed out".		
ENV5 – Ridge & Furrow	Conservation Officer's: Page 42 says that Historic England "recognises the national historic importance of ridge-and-furrow and supports its protection as a non-designated heritage asset". No source is offered to support this assertion. Figure 11.3 indicates "surviving ridge and furrow" coloured buff and orange. There is no key to explain the significance of the two colours.	Page 38: The council's Conservation Officer notes that the ridge and furrow to the immediate south-west of Snibston deserted medieval village (see attached). This area of ridge and furrow has been in meadow cultivation since before the year 2000 and it has "a clear association with contemporary settlement remains". This area does not appear on figure 9.3 of the NP.	<p>Comment: There is ridge and furrow to the immediate south-west of Snibston deserted medieval village (please see the image at the end of this note). This area of ridge and furrow has been in meadow cultivation since before the year 2000 and it has "a clear association with contemporary settlement remains". This area does not appear on figure 9.3 of the NP.</p> <p>Objection – to be consistent with the proposed changes to Policy ENV4, amend the first sence of "POLICY ENV 5: RIDGE AND FURROW - The areas of ridge and furrow earthworks mapped here (Figure 9.3) are <u>of local heritage interest</u>. non-designated local heritage assets.</p>

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			Any loss or damage..." Reason – to ensure consistency with the NPPF Annex A
Biodiversity and habitat connectivity (page 44)	The third paragraph states there has been an 'observed 70% decline' what is the source for this claim? The following paragraph has a ' mark before embed which seems to suggest it is a quote, but there is no end to the quote and nor is it clear where it comes from.	Page 40: No change but this is not considered to be a significant issue	None
Local Wildlife Corridor (page 44)	The cross reference needs to be completed, at present to refers to Policy ENV xx	Done	None
Figure 13 (page 45)	It is not clear on the choice for the green habitat sites supporting the wildlife corridor. When compared with figure 7.2 it would appear the some but not all of various types of site of natural significance have been used to create one linear corridor. Indeed there are areas of land which are not identified in figure 7.2 being used. What is the justification / assessment for including sites in this policy and why is the map focussing on a single line of corridor and not connecting to the other sites identified in figure 7.2?	Page 40: No change.	Comment - the justification/ assessment for including/ excluding sites in this policy is not obvious and nor is why the map focusses on a single line of corridor and does not connect to the other sites identified in figure 7.
Policy ENV 6 (page 45)	In the second paragraph it states " <i>In cases where the development is determined...</i> " This is a bit ambiguous as to what is acceptable to outweigh the the	Page 41: No change	Objection - In practice, the decision-making balancing exercise takes place after the measures for mitigation/ compensation are identified.

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	biodiversity loss is it the scale / type / benefits of the development?		<p>Also, the NPPF (paragraph 175) sets out a sequence for applications which may result in significant harm to biodiversity which is firstly to avoid the harm, then to mitigate for the harm and finally to compensate for the harm.</p> <p>Amend the second paragraph of Policy ENV 6 to read; "Development proposals will be assessed by balancing the development's intrinsic economic and societal value against any resulting biodiversity loss. In cases where the development is determined to outweigh biodiversity loss and avoidance of loss is therefore not possible (NPPF paragraph 175), the developer will be required to facilitate biodiversity net gain through mitigation (onsite) and/or compensation (habitat creation of equal biodiversity value, onsite or elsewhere). <u>Significant harm to biodiversity as a result of development should be avoided. If significant harm cannot be avoided, on-site mitigation is preferable to compensation measures elsewhere (e.g.</u></p>

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			<p><u>habitat creation of equal biodiversity value elsewhere).</u> <u>Development should also facilitate biodiversity net gain.</u> “</p> <p>Reason – to ensure consistency with the NPPF (paragraph 175).</p>
ENV7 – important views	<p>Conservation Officer: Page 46 refers to six “important views”. For monitoring purposes it would be useful to include a photograph to indicate each view.</p>	<p>Page 41: Photos are included in the plan's appendix</p> <p>Policy ENV7 states that, to be supported development proposals should not significantly harm important views, or their publicly accessible viewpoints, and should include design statements setting out appropriate and effective mitigation measures.</p>	<p>None</p> <p>Comment – the use of the policy in development control decisions would be more straightforward if the identification of harm was a) related to setting and character; and b) related to how this was <i>perceived</i> from these public vantage points.</p> <p>Amend the introductory paragraph to Policy ENV7 as follows; “The following views (Appendix 7 and figure 11) are important for defining the setting and character of Hugglescote and Donington le Heath and are valued by residents. To be supported, development proposals should not significantly harm <u>the setting and character them, or their when</u></p>

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			viewed from these publicly accessible viewpoints and should include design statements setting out should, <u>where necessary, include</u> appropriate and effective mitigation measures.”
Policy T1: Transport Assessment for new Housing Development (Page 48)	It is assumed that the role of this policy is not to require the submission of Transport Assessments. Rather it details what sort of the information should be submitted, in the instances that a Transport Assesment is required. The Leicestershire County Council Highway Design Guide identifies the circumstances a Transport Assessment is required, which is determined by the size and type of development. It maybe useful to refer to this document in order to provide clarity. Point e refers to NP policy H8 however, there are only 4 housing policies in the Neighbourhood plan.	Page 44: Reference to the LCC guide has not been added but this is not a significant omission. T1(e) – no H8	Comment - T1(e) includes a reference to Policy H8 in error.
Policy T2: Residential and Public Car Parking (page 49)	With respect to the parking standards proposed for 4+bedroom dwellings, this aspect of the policy would not comply with the North West Leicestershire Local Plan, the district's Design SPD nor the parking standards set out within the Leicestershire County Council Highway Design Guide. These only require the provision of 3 spaces per dwelling for	Has been removed.	None

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	four or more bed properties.		
Policy T3: Leicester to Burton Railway Line	It si not clear as to what exacly is meant by "Proposals that threaten...". Suggest that it be rewored to state "Proposals for development within the plan area that threaten ..." At the current time there are no proposals to reopen the line and nor have any potential station sites. What happens if land between the Bardon Grange development and the railway line is not available, but land elsewhere in the plan area is? It might be better to state "Development of a new station and associated infrastructure within the plan area will be supported..."	Done Done	None None
Community Facilities and Amenities (page 50)	Should the reference to the Working Mens Club be changed to the Social Club? There only appears to be one shop (McColls with Post Office) if the second shop is the Central Stores, this was converted in 2016. If the second shop is not either of the two above then it may help to include the road they are on. Similarly, it would help to identify the lcoation of many of these facilities and/or their name.	Page 46: Not done – but not considered significant Not done – but not considered signifciant	None None
Policy CF1: Community Facilities and Amenities (pages	Point d refers to policy G2 (SE Coalville) is this correct? Should it be G3 the general design policy? Point f refers to “unacceptable traffic	Page 46: Done Not done. However, this aspect	None None

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50-51)	<p>movements" how will these be quantified? We suggest this include reference to the standard of the Local Highway Authority.</p> <p>Points e and f are partly repititious and can be joined together.</p>	<p>of the policy has not been objected to by LCC Highways which has primary responsibility for this issue.</p> <p>Done</p>	None
Policy CF3 Doctors Surgery (page 52)	Point a refers to "unacceptable traffic movements" how will these be quantified? We suggest this include reference to the standard of the Local Highway Authority.	Page 48: Not done. However, this aspect of the policyhas not been objected to by LCC Highways which has primary responsibility for this issue.	None
Policy CF4 Noisy Sports (page 52)	It is not clear as to how in determining a planning application, the areas in point a would be defined and how excessive noise in point b should be interpreted?	Page 48: Not done.	<p>Comment - criterion c) specifies a 10pm curfew whereas a more generally expressed criterion would enable the appropriate approach to be determined for an individual proposal having regard to the circumstances of the site and surroundings. It is possible that an earlier time would be appropriate in some circumstances. The suggestion is that criterion c) is amended as follows; "A planning condition is attached to any approval to ensure that activities end by 10:00 pm so as not to have a detrimental impact on residential amenity. <u>Planning conditions are used to define the operating hours to control any adverse impacts on residential amenity.</u>"</p>

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			It would also help the application of the policy in development management if 'noisy sports' and 'areas valued for their tranquility' were defined in the supporting text and it was also explained how the boundaries of noise sensitive development would be identified.
POLICY E1: Support for existing employment opportunities (page 53)	<p>The general principle of the policy is supported – however it is not clear if both bullet points need to be demonstrated (i.e. if there should be an 'and' between them) or whether only one needs to be demonstrated (so there should be an 'or' between them).</p> <p>Also, is the 12 months in bullet point a) additional to or concurrent with the six months marketing included in bullet point b).</p> <p>Does the employment-generating uses in bullet point b) relate only to B-class uses or any employment generating uses?</p>	<p>Page 49: Done</p> <p>Clarified in the parish council's comments that this is concurrent.</p> <p>Not clarified. See suggested change.</p>	<p>Objection - the Use Classes Order has been amended such that B1 uses (offices, R&D, light industry) are now incorporated in in a new, expansive Use Class E 'commercial, business and service uses' which includes former A class uses, and indoor health, sport and community uses. The policy should reflect these changes so it is fit for purpose by being clear about the uses to which it applies.</p> <p>"Where planning permission is required there will be a strong presumption against the loss of commercial premises or land (B-class <u>offices, industry, storage/distribution</u>) which provides employment or future potential employment opportunities."</p> <p>Reason – consistency with national policies and guidance</p>

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		Policy E1 requires premises to be vacant for at least 12 months whereas Policy Ec3 of the adopted Local Plan specifies a period of 6 months.	Objection–Policy E1 requires commercial premises to be empty for 12 months which is 6 months longer than the equivalent policy in the adopted Local Plan (Policy Ec3(3)). This means that the requirements are more onerous in the neighbourhood plan area than in the rest of the district and the justification for this should be explained in the plan. Reason – the policy as worded would not be in general conformity with the strategic policies of the adopted Local Plan.
POLICY E2: New small scale employment (page 53)	The policy states that small scale employment needs to comply with the provisions of Policy.... – which Policy is this?	Done	None
POLICY E3: Working from home (page 54)	In bullet point 3, it might be useful to reference design policies in the Local Plan and the Good Design SPD. There should either be 'and' or 'or' between each bullet point to clarify if one or all need to be satisfied.	Page 50: Not done but not a significant omission. Done	None None
POLICY E4: Re-use of agricultural and commercial buildings (page 55)	There should either be 'and' or 'or' between each bullet point to clarify if one or all need to be satisfied.	Done	None
G: Developer Contributions (page	The third paragraph uses a reference to “(PPG 46)” the Planning Practice	Page 52: Done	None

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56)	<p>Gudance is organised like a glossary with an alphabtaised list so it is not clear how this reference works.</p> <p>The District Council is not currently considering the introduction of CIL. However, it may dos o at some future point in time. It is suggested that this section be amended to reflect this.</p> <p>The list under CF1 has two points which should be reconsidered:</p> <ul style="list-style-type: none"> The reference to gateway features for the village seems to be a better fit under the highways requirements rather than a community facility due to the tie in to speed reduction. Notwithstanidng this, any request needs to relate to the impact that the new development will have on the existing facilities, it is difficult to see how a development would be unacceptable in planning terms if the gateways are not provided. The reference to “<i>securing the community centre which is currently owned by the Anglican Church</i>”, will be difficult to achieve as it involves land in a third party ownership, an unknown cost (at this time) 	<p>Done</p> <p>Not changed – but not a significant omission</p> <p>No change - but not a significant omission.</p>	<p>None</p> <p>None</p> <p>None</p>

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	and the likelihood that the scale of new development beyond that already committed will be limited and so would not generate a significant financial contribution.		
Appendix 5: Survey and Research (end of Page 3)	This includes an extract from the NPPF which details the Local Green Space criteria and is taken from the 2012 NPPF, this should be updated to show para. 100 from the 2019 NPPF.	Done	None

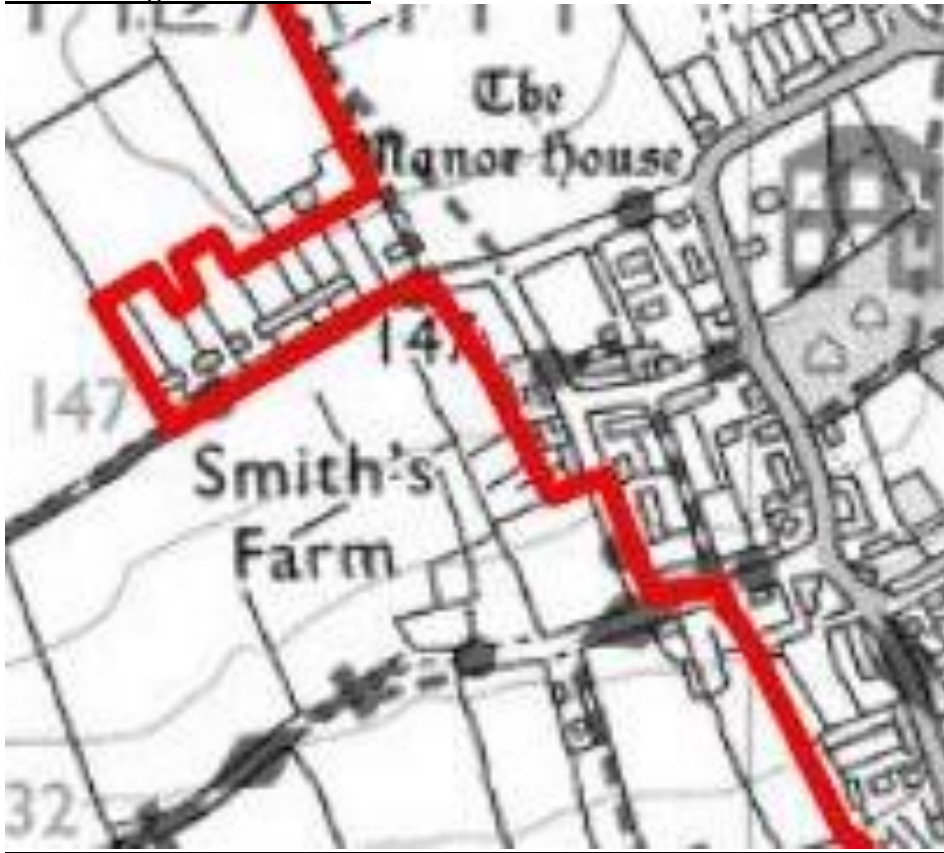
Snibston Ridge & Furrow



APPENDIX B

Limits to Development Differences

H&DIH Neighbourhood Plan



NWL Local Plan



H&DIH Neighbourhood Plan



NWL Local Plan

