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Meeting	LOCAL PLAN COMMITTEE
Time/Day/Date	6.00 pm on Wednesday, 14 August 2024
Location	Abbey Room, Stenson House, London Road, Coalville, LE67 3FN
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 interests you should make clear the nature of that interest and whether it is a disclosable pecuniary interest, registerable interest or other interest.	
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 22 May 2024	3 - 8
5	LOCAL PLAN - STRATEGY POLICIES: CONSIDERATION OF RESPONSES TO CONSULTATION	
	The report of the Planning Policy and Land Charges Team Manager	9 - 114
6	BREEDON ON THE HILL NEIGHBOURHOOD PLAN SUBMISSION (REGULATION 16) CONSULTATION	
	The report of the Planning Policy and Land Charges Team Manager	115 - 142

Circulation:

Councillor J G Simmons (Chair)
Councillor P Lees (Deputy Chair)
Councillor M Ball
Councillor D Bigby
Councillor S Lambeth
Councillor J Legrys
Councillor R L Morris
Councillor P Mout
Councillor C A Sewell
Councillor L Windram
Councillor M B Wyatt

MINUTES of a meeting of the LOCAL PLAN COMMITTEE held in the Abbey Room, Stenson House, London Road, Coalville, LE67 3FN on WEDNESDAY, 22 MAY 2024

Present: Councillor J G Simmons (Chair)

Councillors P Lees, M Ball, D Bigby, S Lambeth, J Legrys, R L Morris, P Moulton, C A Sewell, L Windram and M B Wyatt

Officers: Mr I Nelson, Mr C Elston, Mr T Devonshire, Ms J Althorpe and Ms S Lee

1 APOLOGIES FOR ABSENCE

There were no apologies received.

2 DECLARATION OF INTERESTS

Councillor P Moulton declared a registerable interest, he had been lobbied without influence by residents, with regards to the Meadow Lane site.

3 PUBLIC QUESTION AND ANSWER SESSION

There were no questions received.

4 MINUTES

Consideration was given to the minutes of the meeting held on 17 January 2024.

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

RESOLVED THAT:

The minutes of the meeting held on 17 January 2024 be approved and signed by the Chair as a correct record.

5 LOCAL PLAN REGULATION 18 CONSULTATION

The Planning Policy and Land Charges Team Manager presented the report.

Members thanked Officers for their hard work during the consultation period.

In light of a formal Councillor Questions item on the agenda, it was agreed that the following exchange would be reproduced verbatim in the minutes.

Question to Local Plan Committee 22nd May 2024

Hugglescote and Donington le Heath Neighbourhood Plan "Donington Fields Local Green Space"

Question 1: Ashburton Road Recreation Ground

The proposed Neighbourhood Plan was considered by the Independent Examiner. In his report dated 21st July 2021 he noted in para 4.21 *"My concern about Donington Fields is that, at 11.7ha, it is extensive in nature and that the northernmost two plots owned by the Thomas Harley Charities may not endure beyond the Plan period, contrary to advice in paragraph 99 of the NPPF. Furthermore, some of the individual plots of land scored significantly below the threshold set by the Plan for eligibility for LGS, notably plots 097 and 97A. Therefore, in accepting that most of Donington Fields meets the other designation criteria, I shall recommend that this LGS is modified by the exclusion of the northern most plots of land. (PM8)."*

I would be grateful if Officers can provide me with answers to the following points:

- The two parcels of land, known as the Recreation Ground/Childrens Play Area, has had free and unobstructed pedestrian access for recreation purposes for a considerable number of decades. My understanding is that the updated NPPF dated 20th December 2023 now provides additional protections/safeguarding to existing recreation sites. Considering this NPPF clarification, can the above two sites be designated as 'protected open space' as part of the current Local Plan Review?

Response

There was no change to NPPF in respect of the issue of protecting open space, sport and recreation land and buildings. Paragraph 103 requires that they should not be built on unless assessment shows they are surplus to requirements, or the loss would be replaced by alternative provision in a suitable location or it is for an alternative sports use.

The recreation ground and children's play area would be covered by this policy. The field between the recreation ground and the Manor House, would not.

- Bearing in mind that the Examiner states "*in accepting that most of Donington Fields meets other designation criteria*", can Officers please explain what these other designations are please?

Response

The reference to other designation criteria refers to paragraph 106 of the NPPF. This states:

The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;*
- b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and*
- c) local in character and is not an extensive tract of land*

The Examiner's concern related to point c) as he considered it to be "extensive in nature".

Question 2: Donington Fields Agricultural Land (known locally as the Farmer's Field)

This land adjoins the Grade 2 listed Medieval Manor House. The Manor House is now in the ownership of Leicestershire County Council. The 13th Century Manor House is open to the public as the '1620 Manor House and Gardens' with displays explaining the use of the house and surrounding land over the last eight centuries.

Were a Planning Application for development on the Farmer's Field to be submitted to the LPA, I understand that Historic England would be a Principal Statutory Consultee. Can you confirm this please?

Response

Yes we would consult with Historic England

I understand that, when considering Planning Applications associated with 'listed buildings', consideration must be made to protect not only the buildings but also the wider landscape, known as the 'setting'.

- Can you please provide details as to how our Planning Officers have regard to the good practice advice provided by Historic England when assessing the effect of a proposed development within the Setting of a Listed Building.

- How might a proposed development on the Farmer's Field be assessed in the light of this advice?

Response

The NPPF defines the setting of a heritage asset as:

“The surroundings in which a heritage asset is experienced. Its extent is not fixed and may change as the asset and its surroundings evolve. Elements of a setting may make a positive or negative contribution to the significance of an asset, may affect the ability to appreciate that significance or may be neutral”.

The Planning Practice Guidance also provides further guidance on the issue of setting. [Historic environment - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

Advice on matters relating to setting will be sought from the Council's Conservation Officer or from specialist consultants as is deemed necessary.

After this exchange was concluded Members discussed communications with the public, the need to simplify things for residents wherever possible, what role Members could play in promoting this, and they also noted the uneven take up of the consultation sessions with residents. The Planning Policy and Land Charges Team Manager largely shared these concerns, although he noted that planning matters were inherently complex and thus difficult to communicate.

A Member discussed the recent briefing on the Isley Woodhouse development which had demonstrated the complexities involved in making that new settlement a success; and that settlement of course played a key role in the Local Plan. Therefore, would something concretely detailing the plans for the settlement be coming to the committee. The Planning Policy and Land Charges Team Manager had no plans to bring something to the committee at this moment, and advised that it was currently more important to articulate principles, rather than details.

A Member asked about the transport modelling and whether it was on schedule. The Planning Policy and Land Charges Team Manager said that the modelling was currently at a fairly abstract level of detail, but, that caveat noted, the modelling should be ready to feed into the report on allocations planned for the committee in August.

A debate was had amongst some Members about the site at Meadow Lane. The Planning Policy and Land Charges Team Manager confirmed that a developer had in fact put in an objection to it being taken out of the Local Plan, which had been against Officer's recommendations. He then set out some technical details of what would happen if sites were taken out.

Members debated whether some data could be presented more qualitatively or whether this was an essentially quantitative process which strove for the utmost objectivity. The Planning Policy and Land Charges Team Manager advised that there were capacity issues in the team which would hamper the selection of qualitative data, and there was also the risk of Officers appearing partisan due to the subjective nature of each response.

Following on from this Members discussed the tight timeline which the Committee was working too. The Planning Policy and Land Charges Team Manager added that the next stage was a restricted and very formal part of the process, and he did not envisage them doing anymore consultation events.

A Member felt that the profile of properties must be considered and should reflect the wide variety of demand. This should also link in to the employment base for the district, to create a true sense of community rather than simply produce homes for commuters. This also had an environmental dimension. The Planning Policy and Land Charges Team Manager advised that the nature of the UK system precluded an overly top-down approach.

It was moved by Councillor J Legrys, seconded by Councillor R Morris, and

RESOLVED THAT:

- 1) The comments made in respect of the Draft Local Plan be noted;
- 2) The progress in respect of the development of the evidence base be noted.

6 HOUSING AND EMPLOYMENT LAND UPDATE

The Principal Planning Policy Officers presented the report.

Members discussed possible changes to the employment allocation at Money Hill, expressing some concern at the envisaged reduction as requested by developers. The Principal Planning Policy Officers advised that the Development Control team had received an Environmental Impact Scoping Opinion, which proposed a lesser amount of employment land. They had not yet seen a justification, so this was simply something to note as an emerging issue in the context of the Local Plan as a totality. The Head of Planning and Infrastructure also updated Members in respect of issues related to the River Mease Special Area of Conservation.

A Member asked for an update on the rescinding of the HS2 legislation. Officers advised that this was planned for summer 2024, although officers noted the unpredictable political context, nationally.

A Member asked about the current status of the five year land supply and when it was likely to run out. The Principal Planning Policy Officer advised that Officers were currently finalising the five year housing trajectory and then would be able to do the relevant calculations. The NPPF guidance had also been changed at the end of 2023 and this had impacted calculations.

A Member asked about the underutilisation of employment land and how this was reflected in the Plan. The Principal Planning Policy Officer noted the challenges of predicting future employment trends, but ultimately Officers had to make the best predictions they could after consulting with the relevant experts. Flexibility must also be built into the finalised Plan.

Members and Officers discussed how the envisaged Freeport impinged on the Plan, and Officers noted that the Council was now just a consultee on the application for a Development Consent Order, and Officers thus could not give definitive answers, though further details would be forthcoming in future meetings.

A Member inquired about the use of consultants in respect of employment forecasts and how their track record of success, or otherwise, was determined. Officer advised that there was a number of ways to produce forecasts and that planning guidance recommended utilising a variety of methods, comparatively and holistically. Officers sought references when appointing consultants and they frequently consulted with other local authorities before hiring a given consultant.

It was moved by Councillor J Legrys, seconded by Councillor M Ball, and

RESOLVED THAT:

The housing and employment position as at April 2024 as set out in the report be noted.

The meeting commenced at 6.00 pm

The Chairman closed the meeting at 7.40 pm

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<p>Recommendations</p>	<p>THAT THE LOCAL PLAN COMMITTEE:</p> <ul style="list-style-type: none"> (i) NOTES THE COMMENTS RECEIVED IN RESPECT OF STRATEGY POLICIES S1 TO S5; (ii) AGREES TO THE PROPOSED CHANGES TO THE PLAN OBJECTIVES AS SET OUT IN SECTION 3 OF THIS REPORT AND APPENDIX A; (iii) AGREES TO THE PROPOSED CHANGES TO STRATEGY POLICY S1 AS SET OUT IN SECTION 4 OF THIS REPORT AND APPENDIX B; (iv) AGREES TO THE PROPOSED CHANGES TO STRATEGY POLICY S2 AS SET OUT IN SECTION 5 OF THIS REPORT AND APPENDIX C; (v) AGREES TO THE PROPOSED CHANGES TO STRATEGY POLICY S3 AS SET OUT IN SECTION 6 OF THIS REPORT AND APPENDIX D; (vi) AGREES TO THE PROPOSED CHANGES TO STRATEGY POLICY S4 AS SET OUT IN SECTION 7 OF THIS REPORT AND APPENDIX E; AND (vii) AGREES TO THE PROPOSED CHANGES TO STRATEGY POLICY S5 AS SET OUT IN SECTION 8 OF THIS REPORT AND APPENDIX F.
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1 BACKGROUND

- 1.1 The Local Plan Committee of 18 October 2023 agreed the draft Local Plan policies for consultation purposes. The consultation was undertaken between 5 February and 17 March 2024.
- 1.2 A report to the 22 May 2024 meeting of this Committee received a report which provided an overview of the responses to the consultation in respect of the numbers and sources of representatives.
- 1.3 The draft policies were divided into subject chapters. This report is concerned with chapter 4 regarding Strategy. Further reports to this Committee will consider the other chapters and responses in due course.
- 1.4 The Strategy Policies have been subjected to Sustainability Appraisal by the Council's consultants. Their findings can be viewed from the link above. They are broadly supportive of the proposed policies. However, mitigation measures are suggested in respect of two policies. These are considered under the relevant policy in the respective section of this report.
- 1.5 As members will be aware the new government published proposed changes to the National Planning Policy Framework (NPPF) and also issued a number of other documents for consultation on 30 July 2024. The various documents can be viewed from the link above.
- 1.6 In preparing this report it has not been possible to take into account all of the proposed changes that could have implications for the policies in the Strategy chapter. Therefore, it may be necessary for future reports to address these. However, there a couple of issues which are of fundamental importance to the Local Plan.

Housing requirement

- 1.7 Currently the starting point for identifying a housing requirement is the outcome from the standard method. For this Council the figure is 357 dwellings each year. To this is then added any additional need to address a shortfall in provision elsewhere in the Leicester and Leicestershire Housing Market Area. In this instance the fact that Leicester City is unable to meet its own needs, particularly as the standard method included a significant

uplift to the requirements for a number of urban areas, including Leicester City. From this the requirement in North West Leicestershire is 686 dwellings each year.

- 1.8 Whilst the standard method is retained, how it is proposed to be calculated has changed. This sees a significant increase for North West Leicestershire from 357 dwellings to 621 dwellings. Similar increases are proposed for the majority of other Leicestershire authorities. However, the revised method now no longer includes the uplift for Leicester City and so the City's need is reduced significantly.
- 1.9 Discussions are required under the Duty to Cooperate with the other Leicester and Leicestershire authorities to fully understand the implications of these proposed changes. For example, it is not clear whether Leicester City will still have an unmet need or whether any other authorities will now have an unmet need as a result of these proposed changes. There is also no guarantee that these will be the final figures until later on the year when the government had considered the responses to the consultation. In addition, other work is taking place to consider the issue of the balance between homes and jobs in the district.
- 1.10 For the above reasons, at this time no changes are proposed to be made in respect of the housing requirement to be met as part of the Local Plan, but this matter will be kept under review as more information becomes available and will be addressed in future reports.

Date for submitting the Local Plan

- 1.11 Members will be aware that following changes to the plan making system agreed as part of the Levelling up and Regeneration Act 2023, that plans being prepared under the current system have to be submitted for Examination by the end of June 2025. The government is now proposing that this be extended to the end of December 2026.
- 1.12 This it be welcomed as it will provide more time to ensure that the Council has all the necessary evidence in place to secure a 'sound' plan. However, it is very important that progress on the preparation of the plan is maintained.

2 STRUCTURE OF THIS REPORT

- 2.1 The purpose of this report is to consider the responses received in respect of the Strategy chapter which included the Objectives and five policies.
- 2.2 The issues raised in responses are summarised and considered in the following sections of the report together with the relevant supporting appendix. In respect of some policies, a number of responses made the same or similar points and these are considered in the main report followed by a consideration of the issues and how the Council should respond.
- 2.3 In terms of each of the policies, they attracted the following number of responses:
 - Plan Objectives: 26 responses
 - Policy S1 - Future Housing and Economic Development Needs: 78 responses
 - Policy S2 – Settlement Hierarchy: 52 responses
 - Policy S3 – Local Housing Needs Villages: 10 responses
 - Policy S4 – Countryside: 19 responses
 - Policy S5 – Residential Development in the Countryside: five responses

3 PLAN OBJECTIVES

- 3.1 The draft Plan contains 11 objectives (pages 12/13 of the Proposed Policies document). These describe in overall terms what the Plan aims to achieve and provides an overarching framework for the policies which follow. Each of the draft policies contribute to at least one of the objectives.

- 3.2 The majority of the consultation responses are seeking to either add a further objective or to widen the scope of the existing objectives.
- 3.3 The feedback from the consultation feedback is set out at Appendix A and the following changes are recommended in response:
- Objective 4 (reducing the need to travel) – highlight the use of green infrastructure (footpaths, green links) where possible to connect homes, workplaces etc in response to a comment from Natural England.
 - Objective 8 (conserving and enhancing our heritage) – add reference to overall historic character in response to a comment from Leicestershire County Council (LCC).
 - Objective 9 (conserving and enhancing our natural environment) – add references to habitat connectivity and green infrastructure in response to Natural England and to Biodiversity Net Gain in response to the Environment Agency and Caddick Land.
 - Objective 11 (ensuring sufficient infrastructure) – add that access to services and facilities will be enhanced where possible in response to Sport England.

4 POLICY S1 - FUTURE HOUSING AND ECONOMIC DEVELOPMENT NEEDS

- 4.1 The feedback from the consultation feedback is set out at Appendix B.
- 4.2 The responses to this policy tended to fall into two opposing categories; those (principally developers and landowners) who considered that the housing and/or employment requirements should be higher and those (principally residents) who considered that the housing and/or employment requirements were too high.
- 4.3 The following considers some of the most common responses received from developers and landowners.

Housing requirements

Expressing the requirement as minimum

- 4.4 As currently written, Policy S1 does not provide any flexibility and the requirement appears as an absolute figure. The adopted Local Plan refers to a 'minimum' housing requirement. It is considered that it would be appropriate to refer to the requirement as a minimum.

Affordable Housing

- 4.5 A number of representations refer to the need to increase the housing requirement to assist in meeting the need for affordable housing.
- 4.6 The National Planning Policy Framework (NPPF) is clear that the outcome from the government's standard method is "an advisory starting-point for establishing a housing requirement for an area" (paragraph 61). The standard method includes a built-in adjustment to take account of affordability. This is recalculated on annual basis by government using data to ensure that "Local housing need responds to price signals" and "is set at a level to ensure that minimum annual housing need starts to address the affordability of homes" (Planning Practice Guidance Paragraph: 006 Reference ID: 2a-006-20190220).
- 4.7 The current figure for standard method for North West Leicestershire (February 2024) is 357 dwellings, some 15 dwellings less than that used to inform the Statement of Common Ground (SoCG) (372 dwellings). This reduction is because of a decrease in the affordability ratio used in the standard method.

- 4.8 The Leicester and Leicestershire Housing and Economic Needs Assessment (HENA) identifies a need for affordable housing across the district of 382 dwellings each year (HENA table 9.40). This is more than the outcome from the standard method. However, the housing requirement proposed in the draft plan is 686 dwellings, some 304 dwellings more than the affordable housing need.
- 4.9 The HENA goes on to consider the issue of whether there is a need to uplift the housing need figure for the Housing Market Area. It concludes that there is not a case, although there may be a case for some flexibility as there is the prospect that the affordability ratio could worsen. As noted above, since the SoCG was agreed the affordability ratio has shown a reduction. This, together with the fact that the housing requirement significantly exceeds the need for affordable housing identified in the HENA points, therefore, to there not being a case to further increase the housing requirement for affordability reasons.

Plan period

- 4.10 A significant number of responses from developers and/landowners refer to the NPPF statement that “strategic policies should look ahead over a minimum 15-year period from adoption” (paragraph 22 NPPF December 2023).
- 4.11 The current Local Development Scheme envisages adoption of the Local Plan around October 2026. Therefore, this would require an end date of 2041, not 2040.
- 4.12 It will be noted that the NPPF uses the word ‘should’ rather than ‘must’. This suggests that there is some degree of flexibility in respect of this issue as otherwise it would be a specific requirement. There are examples from elsewhere where Inspectors have accepted a lesser plan period.
- 4.13 Extending the plan period by one or more years would have implications for some aspects of the evidence base, including both the housing and employment land requirements which would be increased. For example, for each year that the plan period was extended there would be a need to identify land for an additional 686 dwellings. Whilst it is likely that enough sites could be identified to achieve this, this would have consequences for other aspects of the evidence base, including transport modelling and the Infrastructure Delivery Plan, which are predicated on the basis of need to 2040. There would be an additional cost, both in time and money, to do this.
- 4.14 It is considered that adding in sites for an additional amount of housing and employment would also necessitate a further round of consultation under Regulation 18 in order to ensure that there is an opportunity to comment before the more formal Regulation 19 stage. Further consultation would add in further time to an already tight timetable based on the current Local Development Scheme which envisages submission by the end of June 2025. As outlined in section one of this report, the government is proposing to move this deadline back to the end of 2026. This matter will therefore require further consideration.

Looking ahead 30 years

- 4.15 As noted above, the NPPF requires Strategic Policies look ahead a minimum of 15-years. It goes on to state [emphasis added] “Where larger scale developments such as new settlements or significant extensions to existing villages and towns form part of the strategy for the area, policies should be set within a vision that looks further ahead (at least 30 years), to take into account the likely timescale for delivery” (NPPF paragraph 22).
- 4.16 In view of the scale of the Isley Woodhouse proposal it simply would not be possible for it to be built out in its entirety in the plan period. Taking a longer-term view of such developments, as required by the NPPF, is necessary to ensure that development beyond the plan period is consistent with a longer-term vision in terms of matters such as

design and the provision of infrastructure; in effect ensuring that such a development is properly planned and not constrained by the end date of a plan. However, it does not require that the whole plan period be extended to at least 30-years.

The plan should be rebased to 2024

- 4.17 The current start date for the Local Plan is 2020. Updating the overall requirement to a 2024 date would be appropriate and is almost certainly likely to be required by an Inspector at Examination stage. The 22 May 2024 meeting of this Committee considered a report regarding the housing and employment land position as at 1 April 2024, but with a start date of April 2020. This identified a residual requirement of 5,490 dwellings. Table 1 below updates this to start date of April 2024.

Table 1 – Housing Land Supply position at 1 April 2024

		No of dwellings
A	Annual housing requirement	686
B	Housing requirement 2024-40 (A x 16)	10,976
C	10% flexibility allowance (C x 10%)	1,098
D	Total requirement (B + C)	12,074
E	Commitments from major sites (10+ dwellings) 2024 to 2040	6,436
G	Residual requirement to be allocated in Local Plan (D – E)	5,638

- 4.18 The effect of this is to increase the residual requirement by about 150 dwellings, a reflection of the fact that between 2020 and 2024 completions have exceeded requirements.

May need to take unmet need from elsewhere

- 4.19 Based on the current Statement of Common Ground (SoCG) no authority in Leicestershire other than Leicester City Council has declared an unmet need, although this may change in view of the revised housing requirement figures. Hinckley and Bosworth Borough Council has not accepted that the full unmet need from Leicester City apportioned to it in the current SoCG is appropriate. It will be for Hinckley and Bosworth Borough Council to justify this position as part of their Local Plan Examination process. Only if they are able to persuade an Inspector that their argument is correct would there be a need for the remaining unmet need to be apportioned elsewhere. This would have to be done through a revised SoCG rather than one authority unilaterally accepting any residual unmet need.

Why not use option 7b housing requirement figures?

- 4.20 The Council undertook consultation between January and March 2022. This set out a range of potential housing requirements (359 dwellings, 448 dwellings, 512 dwellings and 730 dwellings each year). At that time the two higher scenarios were judged as appearing “to cover the most likely future requirement until such time as the redistribution of unmet housing need from Leicester City has been agreed”.
- 4.21 The SoCG which addressed the issue of unmet need was published later in 2022 and included a figure of 686 dwellings for North West Leicestershire. The SoCG was agreed by this Council at its meeting in September 2022. Whilst the revised requirement has not been assessed in respect of the Sustainability Appraisal, this is currently being undertaken as part of the Sustainability Appraisal (SA) of the whole Regulation 18 plan.

General employment requirements

- 4.22 Draft Policy S1(2) details the amount of general employment floorspace needed over the plan period. The basis for these figures is the [Need for Employment Land Report 2020](#) (the ‘Stantec Report’). A number of representations raised issues with this study.

- It covers the period to 2039 whereas the plan end date is now 2040
- It is out of date. It was prepared in 2020 and does not fully reflect subsequent changes such as the impacts of Covid, growth in e-commerce and structural changes to operating practices; the forecasts it relies on are now out of date; it does not reflect market demand and actual levels of take up.
- A few representors argue that demand has been suppressed in recent years because of restricted availability of land. If this were taken into account, the requirement figures would increase.

4.23 In response, the Council's consultants were asked to provide a 'sense-check' update of the Stantec Report (this can be viewed from the link above - North West Leicestershire – The Need for Employment Land July 2024 Update). This is not a new employment land assessment, rather it is an update exercise to test whether the requirements are broadly reasonable taking account of more recent information. Also, as the original Stantec report covers the period 2017-2039, the following has been done as part of the update exercise:

- Extend the evidence to 2040, the end date of the Plan. Previously officers have estimated the figure for 2040; the update report now does this formally.
- The base date of 2017 is now some seven years in the past. The consultants have advised that a Local Plan Inspector is very likely to ask for the employment requirements to be rebased to (i.e. start from) 2024. There is little logic to retaining a start date of 2017, especially as this does not correspond to any other date in the plan. It is prudent to make this adjustment now when we have time to deal with any implications rather than waiting for the Examination to start. On one hand this adjustment means the employment land requirements are for a shorter period i.e. 16 years (2024-2040) rather than 23 years (2017-2040) but on the other hand, development completed in the period 2017-2024 will no longer 'count' towards the requirement.

4.24 The Update finds that "the conclusions and recommendations of the 2020 report were and remain soundly based, and this 2024 report applies broadly the same method to update the floorspace/land needed".

Table 2 – Comparison of the Stantec and updated requirements.

	Offices (sqm)	Industrial/non-strategic Warehousing (sqm)
Stantec Requirement (2017 – 40)	59,590	195,500
Updated Requirement (2024 – 40)	35,000	146,000

4.25 As previously, allowances/margins and planning permissions are factored in resulting in the residual requirement shown below. One difference is that a flexibility allowance for the office component has not been added this time. Given the widespread weakness in the office market, the Council's consultants advise that an additional uplift to provide flexibility for the office sector is not merited.

Table 3 – Updated Employment Land Requirement (2024-40)

		Offices (sqm)	Industrial/non-strategic Warehousing (sqm)
A	Rapleys requirement (2024 – 40)	35,000	146,000
B	Losses allowance (2026-40)	3,180	51,577
C	Flexibility margin	0	77,653
D	TOTAL REQUIREMENT (A+B+C)	38,180	275,230

F	Net permissions (incl. U/C)	14,644	77,436
G	Allocation (Money Hill)	31,980	42,640
H	TOTAL SUPPLY at 1 April 2024 (E+F+G)	46,624	120,076
	Residual requirement (2024-40)	-8,444 sqm	At least 155,154 sqm (=38.8Ha)*

* land areas calculated using the conversion factors ('plot ratios') from the Stantec study.

4.26 For comparison, the requirements based on original Stantec figures which were reported to the May meeting of this Committee are as follows:

Table 4 – Stantec Report Employment Land Requirements (2024-2040)

Residual requirement (2024-40)	Up to 13,391sqm (=2.23Ha) *	At least 117,183sqm (=29.3Ha)*
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4.27 For offices there is a decrease in the overall requirement compared with the [May 2024 Local Plan Committee](#) position to the extent that it appears that the existing land supply will more than satisfy office needs to 2040. This decrease is largely down to a simplification of the consultants' approach as they do not make technical adjustments they previously applied because the office market is relatively subdued and, for the same reason, the omission of the flexibility allowance that was previously applied. This suggests that the new Local Plan would not need to allocate additional land for offices but an important further consideration will be to review the current office land supply (sites with planning permission and the Money Hill allocation). This will be considered when the proposed site allocations are reported to a future meeting of this Committee.

4.28 The industrial/smaller warehousing requirement increases by some 37,971sqm compared with the position presented to the May meeting. In the main, this stems from rebasing the requirement to 2024 and the consequent omission of 2017-2024 completions (87,471sqm) from the calculation.

Strategic warehousing

4.29 Policy S1 will need to confirm how much additional strategic warehousing will be needed in the district to 2040. The draft policy references the forthcoming Leicester and Leicestershire Apportionment of Strategic Distribution Floorspace study as a relevant piece of evidence but unfortunately this study has not yet been published.

4.30 As with the housing requirements the comments tended to fall in to one of two categories:

- The Leicester and Leicestershire Strategic Distribution Study (2021) is out of date and its methodology results in an under-estimate of the need for strategic warehousing. Alternative approaches are put forward.
- In the reverse, some argue that the need figures are unrealistic (too high) and unjustified

4.31 Officers are seeking expert advice on some of these points. Overall, at this stage, officers are not yet able to make recommendations on this matter but will do so at a future meeting of the Committee.

4.32 The proposed changes to Policy S1 are included at Appendix G. Deletions are shown as crossed out and additions are underlined.

5 POLICY S2 – SETTLEMENT HIERARCHY

5.1 The feedback from the consultation feedback is set out at Appendix C.

5.2 The following considers some of the most common responses that were received.

Key service centres

- 5.3 A number of responses queried whether Ashby de la Zouch and Castle Donington should be given equal status in the settlement hierarchy. Some suggested that Ashby de la Zouch should have the status of a Principal Town and one suggested that Castle Donington should be a Principal Town.
- 5.4 Whilst Ashby de la Zouch does benefit from both more retail and leisure opportunities than Castle Donington, the latter benefits from the significant employment opportunities in and around the town, as well as a better level of public transport provision. Furthermore, Castle Donington is located within the Leicestershire International Gateway growth area identified in the Strategic Growth Plan for Leicester and Leicestershire. Therefore, it is considered that they both can be regarded as key Service Centres. Neither settlement has as extensive a range of services and facilities or population size as the Coalville Urban Area and so would not be appropriate as a Principal Town.

Sustainable Villages

- 5.5 A number of responses have raised issues regarding Sustainable Villages. Some question the status of Ravenstone and Appleby Magna in view of their proximity to the Coalville Urban Area and Mercia Park respectively. For the reasons set out in Appendix C no changes are proposed. Others have raised issues about the potential for changes in circumstances in terms of the availability of services and facilities. Part (3) of the policy as originally drafted recognised this in respect of the loss of services and facilities in Sustainable Villages. A new part (4) is suggested in respect of the unlikely event that a Local Needs Village gains services and facilities.
- 5.6 There is concern that the approach to Sustainable Villages is too restrictive and that without more growth services and facilities will continue to decline. The settlement hierarchy strikes a balance between allowing some development in Sustainable Villages and the need to reduce the need to travel by car. No change is proposed.

Status of Isley Woodhouse

- 5.7 Two responses make the point that as Isley Woodhouse does not exist at this time, that it should not be included in the settlement hierarchy. It is agreed that the inclusion of Isley Woodhouse in the settlement hierarchy is inappropriate at this time. However, part (2) of the policy is required to explain that it is an exception to the hierarchy policy. Future plans will need to consider where it lies in the settlement hierarchy (or similar).

Failure to refer to allocations outside of settlements

- 5.8 The point is made that the current wording only refers to sites within the Limits to Development. However, the policy fails to recognise that the emerging plan also, appropriately, includes other allocations that are and will remain outside Limits to Development, for example various employment designations. It is suggested that the policy should be amended or such sites should be within the Limits to Development. It is considered that the policy should be reworded.

Sustainability Appraisal

- 5.9 The Sustainability Appraisal identifies two potential significant effects arising from the policy.

SA Objective	Policy Reference	Potential Effect	Mitigation Measure	Council response
SA12	Policy S2: Settlement	Significant Negative	A policy or policy wording protecting development on	Other policies in the plan address biodiversity. All

SA Objective	Policy Reference	Potential Effect	Mitigation Measure	Council response
	Hierarchy		key biodiversity habitats or pathways, as well as incorporating a need for biodiversity net gain measures, could reduce the impact of development on biodiversity.	the policies of the plan have to be read together. Adding in additional requirements to Policy S2 would be an unnecessary duplication.
SA14	Policy S2: Settlement Hierarchy	Significant Negative	A policy or policy wording protecting development on the best and most versatile agricultural land could reduce the impact of development on land.	This will be addressed when considering other policies rather than as part of this policy in order to avoid unnecessary duplication.

5.10 No further changes are proposed to Policy S2 as a result of the Sustainability Appraisal.

5.11 The proposed changes to Policy S2 are included at Appendix G. Deletions are shown as a crossing out and additions as underlining.

6 POLICY S3 – LOCAL HOUSING NEEDS VILLAGES

6.1 The feedback from the consultation is set out at Appendix D and the following changes are recommended in response:

- For the purposes of clarity and consistency, an amendment is proposed to part (1) to make clear that Policy S3 only applies to proposals for residential development in the local housing needs villages where they do not accord with Policy S5 (Residential Development in the Countryside) or do not comprise a rural exception site (Policy H6).
- An amendment to part (3) is proposed to make it clearer that any planning permission granted under the policy will require a legal agreement that:
 - o ties the occupancy of any dwelling to the applicant(s) for at least three years from the date of completion; and
 - o applies the local connection criteria at part (2) to the subsequent sale of the dwelling for the first three months it is on the market.

6.2 The latter has been added in response to concerns that the three-year occupancy period was too short, balanced with the fact that dwellings permitted under S3 will be sold on at some point and that it would be unreasonable to restrict the sale of an open market dwelling to someone with a parish connection in perpetuity.

6.3 The proposed changes to Policy S3 are included at Appendix G. Deletions are shown as a crossing out and additions as underlining.

7 POLICY S4 – COUNTRYSIDE

7.1 Draft Policy S4 sets out the uses that will be supported in a countryside location as well as a number of criteria that development proposals in the countryside need to satisfy to be supported. The feedback from the consultation is set out at Appendix E and the following changes are recommended in response:

- It is proposed to amend criterion (g) to the sub-division of existing dwellings to be consistent with the NPPF.

- It is proposed that criterion (g) is amended to refer only to the replacement of residential dwellings to be consistent with policy S5 and a new criterion is added to Policy S4 to refer to extensions to existing dwellings.
- As currently worded only those proposed developments that accord with (1)(a) to (r) would be assessed against part (2) of the policy. It is proposed that Part (2) be reworded so as to apply to any development in the countryside.
- Part (2)(b) of Policy S4 aims to ensure that proposed development does not undermine the physical and perceived separation between settlements taking into account existing or proposed development. The criteria is somewhat lengthy and could be simplified. It is proposed that the wording is amended to make the requirement clearer and easier to apply when determining planning applications.
- Part (2)(d) of Policy S4 requires that new development is well integrated with existing development. However, this may not be possible in relation to criterion (h) of Part 1, which allows for employment land in accordance with the provisions of Draft Policy Ec4 as there is a potential conflict between the two policies. Therefore, it is proposed that Part(2)(d) be reworded to address this conflict.

7.2 The proposed changes to Policy S4 are included at Appendix G. Deletions are shown as a crossing out and additions as underlining.

8 POLICY S5 – RESIDENTIAL DEVELOPMENT IN THE COUNTRYSIDE

8.1 This policy sets out the instances where residential development may be appropriate in the countryside, including permanent and temporary rural workers dwellings and replacement residential dwellings. One of the responses submitted was the same as the response to policy S4. The feedback from the consultation feedback is set out at Appendix F. No significant issues have been raised but some minor changes are proposed as set out at Appendix F.

Sustainability Appraisal

8.2 The Sustainability Appraisal identifies one uncertain effect arising from the policy.

SA Objective	Policy Reference	Potential Effect	Mitigation Measure	Council response
SA14	Policy S5: Residential Development in Countryside	Uncertain	Further detail within the policy wording to clarify if best and most versatile agricultural land could be developed is needed to determine the nature of the potential effect.	This will be addressed when considering other policies rather than as part of this policy in order to avoid unnecessary duplication.

8.3 No further changes are proposed to Policy S5 as a result of the Sustainability Appraisal.

8.4 The proposed changes to Policy S5 are included at Appendix G. Deletions are shown as a crossing out and additions as underlining.

Council Priorities:	<ul style="list-style-type: none"> - Planning and Regeneration - Clean, green and zero carbon - Communities and Housing
Policy Considerations:	The Local plan is required to be consistent with the National Planning Policy Framework

Safeguarding:	None discernible
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:	The decision, of itself, will have no specific impact. The new Local Plan as a whole will aim to deliver positive economic and social impacts and these will be recorded through the Sustainability Appraisal.
Environment and Climate Change:	The decision, of itself, will have no specific impact. The new Local Plan as a whole will aim to deliver positive environmental and climate change impacts and these will be recorded through the Sustainability Appraisal.
Consultation/Community Engagement:	The Regulation 18 Local Plan has been subject to consultation and further consultation will be undertaken at Regulation 19 stage.
Risks:	A risk assessment for the Local Plan Review has been prepared and is kept up to date. As far as possible control measures have been put in place to minimise risks, including regular Project Board meetings where risk is reviewed.
Officer Contact	Ian Nelson Planning Policy and Land Charges Team Manager ian.nelson@nwleicestershire.gov.uk

RESPONSES TO PROPOSED POLICIES

CHAPTER 4	PLAN OBJECTIVES
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A. GENERAL COMMENTS/SUPPORT

MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
Support for the Plan Objectives, in particular Objectives (1), (4) and (10).	Support welcomed		45	Leicester, Leicestershire & Rutland Integrated Care Board
Agree with the draft objectives	Support welcomed		208 214 226	Curzon Coaker Trust; Bloor Homes & Taylor Wimpey; Harworth Estates & Caesarea
Generally support the objective to ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of number, size, tenure and type.	Support welcomed		237	Home Builders Federation
We support the objectives but there is a lack of detail as to how the planning system will help deliver these objectives. While the planning system has a role in preventing bad development too frequently it is preventing good much needed development. Especially housing, causing the crisis due to lack of supply and rural development.	The objectives will be delivered primarily through the development of the sites identified in the draft plan and by the application of the policies in development management decisions. More broadly they will be achieved by joint working with public and private sector partners, in		422	CLA

	particular on the matter of infrastructure.			
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B. SPECIFIC COMMENTS

MAIN ISSUES RAISED [specific comments]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
Add a 12 th Objective as follows: <i>“Take notice of the adverse impacts of over-development [cumulative] in any one area by more evenly spreading employment, housing needs and opportunities over the region to better distribute wealth and quality of life. [or words to that effect]. In any event, to apply a principle of proportionality for development to better align with population distribution densities”.</i>	The proposed wording suggests a new pattern of development (i.e. a more even spread) which is a matter for the plan’s overall spatial strategy rather than an objective in itself. In any event, some form of proportional approach would fail to recognise the key planning considerations such the availability of infrastructure and services, suitability of individual sites, highway impacts etc. Different patterns of development have been tested through the Sustainability Appraisal process including an option (Option 9) which dispersed new housing to more individual settlements than proposed in the draft Plan.	No change.	115 376	Protect Diseworth; Jim Snee
Objective 1 - Strengthen the wording to ‘support better health and wellbeing....’ or ‘enhance health and wellbeing.’	The current wording of Objective 1 (‘enable the health and wellbeing of the district’s population’) reflects the positive but limited influence the planning system has on health matters.	No change	341	Leicestershire County Council

MAIN ISSUES RAISED [specific comments]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
Objective 2 - this objective could be strengthened through a commitment to address the acute housing affordability issues within the district rather than a simple reference to delivery of affordable housing.	The Local Plan must balance the need for more affordable housing with the necessity for development to be viable and deliverable. The more stringent wording suggested could prove to be unachievable in viability terms.	No change	144 219 221 280	Clarendon Land Ltd; David Wilson Homes; Williams Homes; Richborough
Objective 2 - reference to meeting cross boundary needs is vital given the commitment in the Leicester and Leicestershire Statement of Common Ground to meeting some of Leicester's shortfall and contribute towards the delivery of the sub-regional Strategic Growth Plan	The council has agreed to the 686 dwellings/year requirement in the SoCG and this is clearly expressed in draft Policy S1. It does not need to be repeated in the Objectives.		188 232	Cadwallader Family; Caddick Lane
Objective 2 - the considerable need for built-to-rent needs to be considered and addressed by the new Local Plan	Noted. This is a specific matter to be considered in the context of draft Policy H4 – Housing Types and Mix, rather than the Objectives.		232	Caddick Land
Objective 2 - expand to include the delivery of new homes must also meet local needs with sufficient choice in a variety of locations and settlements.	This is linked to the plan's overall spatial strategy rather than being an objective in itself.		207	Metacre Ltd
Objective 4 - the role of Green Infrastructure should be mentioned, encompassing opportunities to create green links, enhance Public Rights of Way and public access to nature and the countryside.	Agreed.	Amend Objective 4 as follows: "Reduce the need to travel including by private car and increase opportunities for cycling, walking and public transport use,	223	Natural England

MAIN ISSUES RAISED [specific comments]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
		including connecting homes, workplaces and facilities using green infrastructure where possible and through the delivery of dedicated new infrastructure.”		
Objective 5 –Building on agricultural land restricts the ability to provide for the local population.	The NPPF requires us the ‘recognise the economic and other benefits of the best and most versatile agricultural land’ (paragraph 180) in the preparation of the Local Plan. Some greenfield, agricultural land will have to be developed if the required amount of new housing, employment, infrastructure and other uses is to be delivered.	No change.	289	Swannington Parish Council
Objective 5 - This objective should be strengthened to include protecting and supporting the development of the district’s economic assets, including EMA as a national and regionally significant employment and economic asset.	The plan Objectives are high level and set out key principles. They are not the spatial strategy and do not refer to individual sites, however significant a site or sites may be.	No change.	230	MAG Property
Objectives could reference the Government’s Freeports programme although this is an economic designation and it is important to keep planning consideration at the forefront.	Agreed that it is an economic rather than a planning designation.	No change.	233	MAG Property

MAIN ISSUES RAISED [specific comments]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
<p>The Objectives should include express support for, and emphasise the significant impact of, the East Midlands Freeport. It will encourage businesses to locate in the area to take advantage of the financial incentives whilst making best use of the nearby strategic road network and air and rail freight infrastructure. This status is of local, regional and national significance and it is therefore important that the economic growth strategy and plan objectives takes this into consideration.</p> <p>No objectives related to the expansion of East Midlands Airport and Freeport proposals.</p>	<p>The plan Objectives are high level and set out key principles. They are not the spatial strategy and do not refer to individual sites, however significant a site or sites may be. Also, as outlined above, it is an economic designation rather than a planning one.</p>	<p>No change.</p>	<p>290 341</p>	<p>SEGRO; Leicestershire County Council</p>
<p>Add the following key objectives from an economic growth perspective:</p> <ul style="list-style-type: none"> • To support the retention of existing allocations for high quality employment land • To maximise the allocation of new land for employment uses (particularly use classes B1, B2, B8) to accommodate growing businesses 	<p>These are matters for the policies in the plan, not the overarching objectives.</p>	<p>No change</p>	<p>341</p>	<p>Leicestershire County Council</p>
<p>Objective 7 – the importance of nature-based solutions for climate change mitigation should be referenced.</p>	<p>The plan Objectives need to be high level and set out key principles. It is agreed that nature-based solutions will be part of the package of climate change mitigation measures however this</p>	<p>No change.</p>	<p>223</p>	<p>Natural England</p>

MAIN ISSUES RAISED [specific comments]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
	would be encompassed by the current wording.			
It is suggested that the objectives should be stronger in respect of the climate emergency and decarbonisation agenda.	Objective 7 deals with these matters and LCC does not suggest what specific alterations are needed. The current wording is considered appropriate.	No change.	341	Leicestershire County Council
Objective 7 - recognise the role which minerals sites play in combatting climate change and acknowledge the role of the district in helping wider schemes. This links to both the Climate Emergency and strategic green infrastructure ideas.	Minerals is covered in Objective 10 but the role of minerals sites is a more specific matter which is not central to this plan.	No change.	341	Leicestershire County Council
Objective 8 - this might usefully reference <i>historic</i> townscape and landscape character. Historic character is a recognition of the cumulative contribution that heritage assets (designated and non-designated) and the wider historic environment can provide. Historic character looks beyond individual heritage assets, bringing together an understanding of complementary landscape and townscape forms.	It is agreed that some reference to overall historic character, as well as different forms of heritage which contribute to it, could be valuable addition. Landscape character is addressed in Objective 9.	Amend Objective 8 as follows: "Conserve or enhance the district's historic character, including its built, cultural, industrial and rural heritage and heritage assets and their setting."	341	Leicestershire County Council
Objective 9 – add reference to; <ul style="list-style-type: none"> enhancing habitat connectivity and/or contributing to the wider Nature Recovery Network, a key part of the government's 25-year environment plan 	It is agreed that the concepts of habitat connectivity and green infrastructure as a form of natural resource are missing from Objective 9 as written. The current reference to the River Mease SAC is considered sufficient.	Amend Objective 9 to read "Conserve and enhance the district's natural environment, including its biodiversity and habitat connectivity,	223	Natural England

MAIN ISSUES RAISED [specific comments]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
<ul style="list-style-type: none"> • River Mease SAC, due to its European designation • Green Infrastructure. 		geodiversity, green infrastructure , water environments and landscape character, notably the..."		
<p>Objective 9 - amend to read "Conserve and enhance <u>and extend</u> the district's natural environment...". This change is required to reflect the requirements of Biodiversity Net Gain (BNG).</p> <p>BNG is a mandatory requirement of the Environment Act 2021 with all qualifying development to provide a minimum 10% measurable BNG to be delivered as part of the development.</p>	The BNG requirements have come into force since the draft Local Plan consultation documents were prepared. A reference to BNG in Objective 9 is now merited.	Amend Objective 9 to read "Conserve and enhance the district's natural environment, including its biodiversity, geodiversity, water environments and landscape character, notably the River Mease Special Area of Conservation, the National Forest and Charnwood Forest as well as its other valued landscapes and pursue opportunities for biodiversity net gains achieve Biodiversity Net Gain "	404 232	Environment Agency; Caddick Land
Given that this Local Plan has a key part to play in the transition of Housing Market Area (HMA) wide housing spatial distribution from the former Regional Growth Plan emphasis to one now driven by the Leicester and Leicestershire Strategic Growth Plan, it is surprising that there is no Strategic Objective relating to	The Strategic Growth Plan and its relevance is explained elsewhere in the plan documents. The SGP is an important influence on the plan but is not an objective in itself.	No change.	341	Leicestershire County Council

MAIN ISSUES RAISED [specific comments]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
achieving this transition and what that entails.				
Objective 10 - mention the use of waste as a valuable resource and contributing to a circular economy. Amend as follows – ‘10. Ensure the efficient use of natural resources, in particular brownfield land, control pollution and facilitate the sustainable use and management of minerals and the <i>prevention and</i> minimisation of waste.’	The current wording reflects the positive but limited influence the Local Plan can and will have on waste matters.	No change	341	Leicestershire County Council
Objective 11 - the objective should also protect and enhance existing community infrastructure. The Local Plan has a major role to play in this respect as well as providing for new infrastructure through development.	Agreed.	Amend Objective 11 to read “Maintain <u>and where possible enhance</u> access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks and health & social care and...”	143	Sport England
Include a further objective related to ensuring the coordinated delivery of infrastructure across districts required to support growth, but most particularly in respect of the various significant growth proposals coming forward in the International Gateway area, including those part of the East Midlands Freeport, those being	Co-ordinating infrastructure delivery is specifically mentioned in Objective 11. A further objective about cross-boundary impacts is unnecessary.	No change.	341	Leicestershire County Council

MAIN ISSUES RAISED [specific comments]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
promoted by the DevCo and the proposal for a new settlement (Isley Woodhouse) E.g. "Ensure the coordinated delivery of infrastructure required to enable the delivery of new development, including to help to mitigate the cumulative impacts of growth (which may in some cases be cross-boundary)."				
The document has the potential to recognise and align more closely with broader regional or national strategic objectives, such as those related to economic recovery, technological advancement and the transition to a green economy. The objective could be to ensure that local development is cohesive and contributes to wider economic and social objectives.	The suggested wording is very general and, as it stands, would add little to the understanding or interpretation of the plan.	No change	341	Leicestershire County Council
A robust mechanism for implementing the proposed policies and monitoring their outcomes would be welcomed. Are there adequate resources, both financial and human, dedicated to bringing these policies to fruition? Clear metrics and benchmarks could be identified to assess progress towards the document's objectives, ensuring that it is possible to adapt to change.	A monitoring framework will be included in the next version of the Local Plan.		341	Leicestershire County Council

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RESPONSES TO PROPOSED POLICIES

CHAPTER 4	POLICY NUMBER – S1	POLICY NAME – FUTURE DEVELOPMENT NEEDS
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A. HOUSING

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
Policy supported	Noted	No change	20 161 202 206 238 226	Oadby and Wigston Borough Council Mather Jamie o/b/o the Whatton Estate Charnwood Borough Council Pegasus Group o/b/o Taylor Wimpey Hinckley and Bosworth Borough Council Oxalis Planning and Pegasus Group East Midlands o/b/o Harworth Estates and Caesarea
Para 4.10 There has been little to no consultation prior to significant decisions being made.	The Local Plan has previously been subject to consultation in February 2018, November 2018 to January 2019 and January to March 2022.	No change	90	Julia Matthew

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
<p>Para 4.17 The number of new houses proposed is inappropriate and hugely damaging for this area. Castle Donington has already suffered the effects of massive housing development. There are neither the jobs nor the infrastructure to support even more hastily built and ill thought-out housing. A development of this size will be more than a blot on the landscape; it will be a white elephant, stuck in a location where no-one wants it, replacing much needed farmland and green space.</p>	<p>A significant number of jobs already exist in and around the Castle Donington/East Midlands Airport area which has resulted in significant in commuting from other areas. New housing provides an opportunity to achieve a better balance between homes and jobs. New development will need to be supported by infrastructure. An Infrastructure Delivery Plan is being prepared to address this.</p>			
<p>Question the need to have accepted the large provision for additional housing due to Leicester's "unmet need", particularly as this District is not adjacent to Leicester and has very poor public transport provision, so any additional housing provided for Leicester is highly likely to lead to significant and unnecessary commuting by private car. Would expect housing requirement to be 424 dwellings each year.</p> <p>Councils are no longer required to abide by housing targets set according to predicted population growth and can allocate less land to development to avoid changing the character of a</p>	<p>As noted in the report to Council of 6 September 2022 in respect of the Statement of Common Ground (SoCG), the vast majority of the increase in housing provision (58%) is due to economic factors and achieves a better balance between homes and jobs.</p> <p>The National Planning Policy Framework (December 2023) notes that the standard method is an advisory starting point for establishing housing requirements. Exceptional circumstances may justify an alternative approach. As set out</p>	No change	92	Ashby de la Zouch Town Council

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
local area.	in the SoCG there is a need for some unmet need to be accommodated in the district, together with a significant uplift for economic factors.			
The number of houses is unrealistic, will there be amenities from the outset? There is no capacity at existing health providers now. Don't understand the logic (and the plans don't help) of having so much development in the north of county? So many ways to distribute development to increase benefits and minimise negative impact (win-win).	The housing requirement has been established as part of the Statement of Common Ground with the other Leicester and Leicestershire authorities. New development will need to be supported by infrastructure. An Infrastructure Delivery Plan is being prepared to address this.	No change	103	Judith Billington
Challenge the integrity of the 686 housing requirement number. It is based on the high end of an already high assumed number and is further swollen with an additional 10% contingency.	The housing requirement has been established as part of the Statement of Common Ground with the other Leicester and Leicestershire authorities. It takes account of unmet need from Leicester City, which has partly arisen due to the imposition of an uplift by the government. The redistribution of unmet need has taken account of both the relationship with Leicester City, but also economic factors and achieve a better balance between homes and jobs in the district. This will help to reduce in commuting and also CO2 emissions from journeys to work.	No change	115	Protect Diseworth

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
	A flexibility allowance is required to allow for the possibility of sites being developed at a slower rate than anticipated or not coming forward at all.			
<p>Agree with the council's approach that the appropriate starting point for calculating North West Leicestershire's housing requirement is through the government's standard method and that there are no exceptional circumstances to justify an alternative approach. Furthermore, agree that Leicester City's unmet housing need must be taken into account in establishing a housing requirement for the district. However, Leicester City's unmet need is only being reflected for the period up to 2036, whilst North West Leicestershire's new local plan period runs to 2040. Such is the magnitude of Leicester's shortfall, as acknowledged in the SoCG, there is no reason to believe the City will be in a position to meet its housing need beyond 2036. North West Leicestershire's housing requirement of 686 dwellings each year should therefore be increased to take that additional four year period into account.</p>	<p>The figure of 686 dwellings has already been taken into account in the period up to 2040 as shown in Table 2 of the Proposed housing and employment allocations document.</p>	<p>No change</p>	<p>116</p>	<p>Strategic Land Group o/b/o Keith and Sandra Goodwin</p>

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
			237 245 341	Strategic Land, Caddick Land Home Builders Federation Evolve Planning o/b/o Bloor Homes Leicestershire County Council
The plan period should be extended to allow for at least 15-years from the date of adoption consistent with the NPPF	See paragraph 4.10 to 4.14 of main report		130,136,172,174 144,195,200,219, 221, 280 150 182	Fisher German o/b/o Richborough Estates, William Davis Homes, Cora and Mr Botham Marrons o/b/o Clarendon Land and Developments, William Davis, MyPad, David Wilson Homes, Williams Homes, Richborough Estates Savills o/b/o David Wilson Homes (East Midlands) Boyer Planning o/b/o Redrow

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
			183	Homes East Midlands Turley o/b/o Clowes Developments (UK)Ltd, Redrow Homes Ltd and Wilson Pegasus Group
			184,193	o/b/o Hallam Land Management Define Planning & Design Ltd
			187,656	o/b/o Bloor Homes, Rosconn Pegasus Group
			211,216,235	o/b/o Davidsons and Westernrange Stantec UK Ltd
			214	o/b/o Bloor Homes Midlands and Taylor Wimpey Strategic Land, Carter Jonas
			215	o/b/o Secretary of State for Transport c/o High Speed Two (HS2) Ltd

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
			225, 229 237 243 245,256	Planning Prospects Ltd o/b/o St Modwens Logistics and P,W,C & R Redfern Home Builders Federation Avison Young o/b/o Jelson Homes Evolve Planning o/b/o Bloor Homes, Cameron Homes
Suggests amendment to Policy S1 to contain a commitment to co-operate with adjoining authorities in considering cross-boundary proposals for growth and to review the Local Plan to take into account proposals that become part of the strategy for the adjoining area, in particular with respect to a new settlement in Hinckley & Bosworth which is currently being discussed with the Borough Council.	Hinckley and Bosworth Borough Council has yet to agree to include a new settlement as part of their emerging plan. It would be premature to include wording in policy S1 at this time.	No change	133	Chave Planning Ltd o/b/o Nurton Developments Limited
There may be a need to take further unmet need as Hinckley & Bosworth has not agreed to take all the unmet	It will be for Hinckley & Bosworth to satisfy their Local Plan Inspector that their reasons for	No change	150	Savills o/b/o David Wilson

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
<p>need from Leicester City apportioned to it as part of the Statement of Common Ground.</p> <p>There is also a shortfall in provision in the Coalville Urban Area as noted in previous reports.</p>	<p>not accepting the full unmet need from Leicester City apportioned to it in the Statement of Common Ground are appropriate. Only if that is proven would there be a need for the remaining unmet need to be apportioned elsewhere.</p> <p>The shortfall in provision in the Coalville Urban Area will need to be addressed as was made clear in the report to Local Plan Committee in January 2024.</p>			Homes (East Midlands)
<p>Question the amount of overspill from Leicester City to the district, even though there is no common boundary between the two. It does not address the needs of Leicester. It will also result in an increase in carbon emissions due to vehicular movements.</p>	<p>The redistribution of unmet need from Leicester City as set out in the Statement of Common Ground agreed by the Leicestershire authorities has regard to the proximity of each authority to the City, but also to the need to strike a balance between jobs and homes. It is this that has largely driven the increased housing requirement for North West Leicestershire over and above the standard method outcome.</p>	No change	<p>175</p> <p>180</p> <p>304</p> <p>336</p> <p>352</p> <p>376</p>	<p>Oakthorpe, Donisthorpe & Acresford Parish Council</p> <p>Ashby Wolds Town Council</p> <p>Kathryn Hutchinson</p> <p>Kevin Walker</p> <p>Jeffrey Guy</p> <p>Jim Snee</p>
<p>The Local Plan makes more provision for more housing than is appropriate. If the Council has agreed to take unmet need from the City then that is accounted for in the standard method.</p>	<p>The Council agreed to sign the Statement of Common Ground redistributing unmet need from Leicester in September 2022. This is not accounted for in the</p>	No change	181	Adams Hendry Consulting Ltd o/b/o MSV Group

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
<p>Furthermore, the Planning Practice guidance is clear that the 35% uplift for the City should be met within the cities themselves rather than surrounding areas. Any increase in North West Leicestershire should be limited to that based on the functional relationship with Leicester (an additional 52 dwellings each year).</p>	<p>standard method which as set out in the Planning Practice Guidance (PPG) is a minimum annual need figure. The PPG goes on to make clear that a higher housing need figure may be appropriate in various circumstances including taking unmet need from another authority. The redistribution of unmet need has had regard to the functional relationship of each authority to the City, but also to the need to strike a balance between jobs and homes. It is this that has largely driven the increased housing requirement for North West Leicestershire over and above the standard method outcome.</p>			
<p>The proposed requirement of 686 dwellings falls short of option 7b (730 dwellings) previously consulted upon and would result in a shortfall of 880 dwellings. The proposed requirement of 686 dwellings was not tested as part of this but should be in order explain why it has been selected over the higher figure.</p>	<p>See paragraph 4.19 to 4.20 of main report</p>		<p>182 195, 200, 219, 221</p>	<p>Boyer Planning o/b/o Redrow Homes East Midlands Marrons o/b/o William Davis, MyPad, David Wilson Homes, Williams Homes</p>
<p>The plan should be rebased to 2024</p>	<p>See paragraph 4.17 of main report</p>		<p>184,193</p>	<p>Pegasus Group o/b/o Hallam</p>

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
			211,216 219,221	Land Management Pegasus Group o/b/o Davidsons and Westernrange Marrons o/b/o William Davis, MyPad, David Wilson Homes, Williams Homes
<p>The strategic policies should set out the housing requirement for designated neighbourhood plan areas. In accordance with the Planning Practice Guidance, local plans should not duplicate policies in Neighbourhood Plans.</p>	<p>As set out at paragraph 4.76 of the Site Allocations document, there are currently two new Neighbourhood Plans being prepared, one for Breedon on the Hill parish and one for Long Whatton and Diseworth parish. Both plans have, in accordance with the NPPF, been provided with an indicative housing figure in the absence of anything in the adopted Local Plan.</p> <p>The plan also notes that both the Swannington and Blackfordby Neighbourhood Plans have allocated housing sites.</p> <p>There is no requirement for a Neighbourhood Plan to identify sites for housing; this is a decision for a Neighbourhood</p>	<p>Further consideration will be given providing more clarification about the role of Neighbourhood Plans in meeting housing requirements as part of the Regulation 19 plan.</p>	189 196	<p>Long Whatton & Diseworth Parish Council Breedon on the Hill Parish Council</p>

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
	Plan group. For example, one Neighbourhood Plan (Ashby de la Zouch) is being reviewed, but no request was made to provide a housing requirement figure.			
The policy should clearly express that the housing requirement is not a ceiling.	See paragraph 4.4 of main report		195, 200, 219, 221 188 207 214 245,256	Marrons o/b/o William Davis, MyPad, David Wilson Homes, Williams Homes C Green Planning Satplan o/b/o Metacre Ltd Stantec UK Ltd o/b/o Bloor Homes Midlands and Taylor Wimpey Strategic Land Evolve Planning o/b/o Bloor Homes, Cameron Homes
The plan should look ahead at least 30-years	See paragraph 4.15 to 4.16 of main report		215 243	Carter Jonas o/b/o Secretary of State for Transport c/o High Speed Two (HS2) Ltd

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
			656	Avison Young o/b/o Jelson Homes Define o/b/o Rosconn
CPRE is concerned the current calculations are based on questionable out of date data. The interim census results suggest, yet again, that ONS 2014 [used for the standard method figure of 372 dwellings] may no longer be an appropriate base for calculating need. The Leicester unmet need figure has yet to be tested through the examination process	Consistent with national policy, the SoCG takes as its starting point the outcome of the standard method, which is based on the 2014-based household projections. The Leicester City plan Examination is scheduled for later this year, but it would not be appropriate to wait for this to be completed before continuing with this plan.	No change	220	CPRE Leicestershire
Based on comments about the plan objectives falling short, so the strategy as part of the plan follows suit also. Again, scale and number of houses cannot be justified, and I await results of the distribution requirement, but again suggest it will be unrealistic based on scale. IE To much cramped into an inappropriate space; position too close together for both housing and warehousing; in an area which is already heading for over development with an infrastructure which is already struggling to support what is already developed.	The overall scale of housing development that the plan has to provide for has been established through the Statement of Common Ground with the other Leicestershire authorities consistent with national policy. The proposed development strategy in the plan seeks to balance homes and jobs in proximity to each other. The need for new infrastructure is recognised and will be addressed as part of the Infrastructure Delivery Plan.	No change	255	Jonathan Aust

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
<p>The figure of 686 houses per year does not seem to be based on solid facts, but more to do with arbitrary figures. ""Leicester City Council declared that it had an unmet, but unquantified, need in 2017"" It seems that the requirement for extra housing is for Leicester City, and now the premise is to locate this housing away from the city.</p> <p>The " Leicestershire International Gateway" is already overloaded with recent development, i.e. SEGRO , warehousing around EMA, new builds in Castle Donington (with plans for more housing plus warehousing).The proposed development of the Freeport towards Diseworth and similarly Isley Walton would further overload the area and severely impact Diseworth (a conservation area) and surrounding villages.</p>	<p>The figure of 686 dwellings is that included in the Statement of Common Ground and is based on the recommendations in the Leicester and Leicestershire Housing and Economic Needs Assessment Housing Distribution Paper. As noted in the Statement of Common Ground relating to Housing and Employment Land Needs (2022), Leicester City has provided evidence which quantifies the level of unmet need. This was the subject of an independent review of the City's evidence which concluded that that the evidence from the city was robust.</p>	No change	285	Garry Needham
<p>Has Leicester got brownfield sites that could be used rather than countryside in NW Leicestershire. 13,270 for the period of plan, 686 homes per year, almost double the original allocation.</p>	<p>As part of its Local Plan Leicester City sought to maximise the amount of development it can accommodate, including on brownfield sites. The City Council has provided evidence which quantifies the level of unmet need. This was the subject of an independent review of the City's evidence which concluded that</p>	No change	289	Swannington Parish Council

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
	that the evidence from the city was robust.			
Policy S1 should be strengthened to ensure that nowhere in NWLDC should there be an area that suffers excessive loss of countryside, amenity, environment or quality of life and well-being by virtue of over-development.	In coming to a decision on any proposed development it is necessary to have regard to all material considerations, which includes matters such as those highlighted. However, such decisions will rest on the details of what is proposed and what might be acceptable in one location, might not be acceptable in another. As such the plan cannot anticipate every eventuality.	No change	376	Jim Snee
The housing requirements for NWLDC have been considerably increased (nearly 90%) by the enforced co-operation policy with Leicester City Council. I note that recently Coventry City Council successfully challenged the housing figures being imposed upon them by government. Have the underpinning assumptions been challenged to be sure that housing requirement calculations are correct? If housing is needed in Leicester City, then how does meeting that housing need in areas of different character and about 15-20 miles away necessarily help, especially if we use our agricultural land to provide this housing, and inconsideration of Net	The housing requirement takes as its starting point the official housing projections published by the Office for National Statistics as required by national policy. The redistribution of unmet need from Leicester City has had regard to the functional relationship of each authority to the City, but also to the need to strike a balance between jobs and homes in the district. It is the latter that has largely driven the increased housing requirement for North West Leicestershire over and above the standard method outcome.	No change	396	Siobhan Dillon

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
Zero targets. Population growth is currently being driven by immigration, which may not always be the case if we are unable to provide reliable food and energy and materials for development.				
Consider that 686 houses each year is unrealistic.	The housing requirement is based on the outcome from the standard method and an adjustment to help address unmet need from Leicester City, both of which are consistent with government policy. This redistribution has had regard to the functional relationship of each authority to the City, but also to the need to strike a balance between jobs and homes in the district. It is the latter that has largely driven the increased housing requirement for North West Leicestershire over and above the standard method outcome.	No change	401	Mr Wykes
The NPPF requires there to be growth, positive decision making and a significant increase in the supply of housing. The target of 686 houses pa is likely to be an insufficient supply to remedy the housing crisis.	The housing requirement is based on the outcome from the standard method consistent with government policy and an adjustment to help address unmet need from Leicester City. This redistribution has had regard to the functional relationship of each authority to the City, but	No change	422	Country Land and Business Association

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
	also to the need to strike a balance between jobs and homes in the district. It is the latter that has largely driven the increased housing requirement for North West Leicestershire over and above the standard method outcome.			
The methodology employed by the Authority to arrive at the annual number of dwellings is flawed as regards the locations identified. Viz. the loading of those extra dwellings (to accommodate the 'overflow' from Leicester) predominantly in the far north west of the district at the furthest remove from the city. In addition this area starved of sensible public transport solutions and hemmed in by further business development with attendant issues of pollutions of all kinds and an already vastly over-subscribed infrastructure is already experiencing profound degradation. There are better options that would alleviate the pressures around J23.	The redistribution from Leicester City has had regard to the functional relationship of each authority to the City, but also to the need to strike a balance between jobs and homes in the district. It is the latter that has largely driven the increased housing requirement for North West Leicestershire over and above the standard method outcome. The area around East Midlands Airport is well served by public transport with regular links to Derby, Nottingham, Leicester and Loughborough. The need for additional infrastructure will be addressed as part of an Infrastructure Delivery Plan which is being prepared.	No change	475	David Manley
Paragraph 4.33 describes North West Leicestershire as a mainly rural district, which you want to maintain	The authority monitoring report shows that there has been a decrease in the number of larger	No change	487	Mary Lorimer

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
<p>and enhance the environment. Current developments round Coalville/Ellistown have destroyed this rural environment and replaced it by warehousing which provides few job opportunities, increased traffic, particularly HGVs and excessive light pollution. The housing has been predominantly commuter housing for people working in Birmingham and Leicester and has not been of a type to be of use to local people, but has caused problems with excess traffic, loss of public amenity (e.g. public footpaths and old railway line off Grange Road, Hugglescote), destruction of wildlife habitats on Grange Road. The policies sound OK but have very negative effects on the health and well being of the people of the area.</p>	<p>properties built since the current plan was adopted. The draft plan seeks to ensure that that new housing development includes a range of house types and sizes. Whilst there has been significant development around the Coalville area, this is reflection of its status as the largest settlement in the district.</p>			
<p>I disagree that there is a need for that amount of new houses to be built per year, 686 is an unrealistic amount. I feel this is a means to meet corporate greed. There are plenty of brown space areas that could be renovated and repurposed.</p>	<p>The housing requirement is based on the outcome from the standard method consistent with government policy and an adjustment to help address unmet need from Leicester City. This redistribution has had regard to the functional relationship of each authority to the City, but also to the need to strike a balance between jobs and homes in the district. It is the latter that</p>	<p>No change</p>	<p>503</p>	<p>Helen Warren</p>

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
	<p>has largely driven the increased housing requirement for North West Leicestershire over and above the standard method outcome.</p> <p>There is very limited brownfield land in the district that does not already have consent for redevelopment. Current developments include new housing on the site of the former Snibston Discovery Park and at Wolsey Road, both in Coalville.</p>			
<p>I totally object to using the countryside surrounding our village for warehouses and housing. This will destroy our village,</p>	<p>Noted</p>	<p>No change</p>	<p>581</p>	<p>Kathleen Pigott</p>
<p>It is clear the North West Leicestershire is an attractive place for people to live and work and growth of new homes and industrial land has been significant in recent years. It needs to be recognised that the % growth in the District has been way ahead of other parts of Leicestershire. The increase in requirements allocated due to the Statement of Common Ground with Leicester City, is something that is expected within the legal requirements of neighbouring authorities and yet there is no land boundary with Leicester City. The issue has been cause with Leicester</p>	<p>Whilst the district does not share a boundary with Leicester City, there is requirement to ensure that the needs of the Leicester and Leicestershire Housing Market Area (HMA) are met within the HMA as a whole. The redistribution of unmet need from Leicester City has had regard to the functional relationship of each authority to the City, but also to the need to strike a balance between jobs and homes in the district. It is the latter that has largely driven the increased housing requirement for North</p>	<p>No change</p>	<p>651</p>	<p>Amanda Hack</p>

MAIN ISSUES RAISED [Housing]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
City being land locked and developments being restricted to brownfield or loss of green space. The amount of land that has been allocated for homes in recent years across the whole of the District there appears to be a reliance on larger homes. Its useful to see that consideration is given to smaller and affordable homes and/or economic developments. Finally within this section...although it will be reflected in other sections that there has been little consideration to the land allocated within the Freeport Site where this employment land (which has been redlined by Government) considers requirement for land allocated through the district.	West Leicestershire. The plan seeks to ensure that that new housing development includes a range of house types and sizes.			

B. GENERAL EMPLOYMENT

MAIN ISSUES RAISED [General Employment]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
The employment land allocation is much higher than necessary, due considerable additional provision to allow for what are described as <i>“future losses of employment land to other uses and a flexibility margin as insurance for uncertainty and changing business needs”</i> . This is contrary to the recommendations of	Notwithstanding the consultants’ advice, the Council considers that these adjustments are justified. a) historic evidence suggests that some employment land will be redeveloped for other uses over the lifetime of the new plan; and b) to demonstrate some flexibility as required by the NPPF (paragraph	No change.	92	Ashby Town Council

MAIN ISSUES RAISED [General Employment]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
the Council's own consultants, Stantec (see paragraphs 6.8-6.9 of the Stantec Study).	86d). The approach is also considered to be consistent with the NPPF with respect to 'positively and proactively encouraging sustainable growth' (paragraph 86a).			
<p>1 - Stantec should assess need to 2040 (or whatever the end of the plan period is)</p> <p>2 - Plot ratio of 40% is not realistic. 35% has been used in the strategic B8 study and should be used here</p> <p>3 – 5-year buffer should be added to the ELS as B2/B8 requirement is expressed as a minimum.</p> <p>4 - S1(2) should state that B2/B8 is a minimum requirement (by extension, the office figure be expressed as a maximum.)</p> <p>5 - Employment requirement should be expressed as a single figure and not separated by use class. This is to ensure that the Plan meets anticipated needs over the plan period and provides flexibility to respond to changing economic circumstances.</p>	<p>1 – The Employment Land Update Report (2024) covers the plan period to 2040 and provides an up-to-date assessment of the need for new employment land. The requirement figures in Policy S1 need to be updated accordingly.</p> <p>2 – No change. The Council's consultants confirm that 40% is a reasonable rule of thumb to use for estimating land requirements. The Council has applied a more specific, locally derived ratio to its actual site allocations. This is explained in the Employment Topic Paper.</p> <p>3 - No change. A flexibility margin for industry/smaller warehousing equivalent to five years of completions has been added to the employment land requirements (see Table 4 in the Policies consultation document).</p> <p>4 – Both requirements are expressed as 'at least' figures in</p>	<p>4 – Amend Policy S1(2) to read "The requirement for general needs employment land for the period 2024 to 2040 purposes is at least 35,000sqm for office uses.... and at least 146,000sqm for industrial and small warehousing..."</p>	185	Clowes Developments Ltd

MAIN ISSUES RAISED [General Employment]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
	the update report. Policy S1 to be amended accordingly. 5 - No change. The site requirements for offices may be different to industry/warehousing. Appropriate flexibility is achieved in other ways such as the addition of a flexibility allowance to the requirement figures and the reference to minimum requirements.			
Same issues as raised in Representation 185, plus: 1 - The need calculations are based on employment forecasts produced by Experian and Oxford Economics in 2020, which are now outdated. In addition, the employment needs estimates also don't take account of the recent East Midlands Devolution Deal. Although Leicestershire is not a part of the deal, the area will likely receive economic benefits as a result of the deal, which will lead to need for employment land.	1 – The Employment Land Update Report (2024) is a refreshed assessment of general employment land requirements for the period 2024-2040.	See amendment above proposed response to Rep. 185.	186	Wilson Bowden Developments Ltd
1 - draft policy S1 does not express the 195,500 sqm figure as a minimum 2 - Stantec report is not up to date or reflective of market demand. a) largely pre-dates Covid pandemic which accelerated B2/B8 demand; b)	1 - Agreed. 2/3/4 - The Employment Land Update Report (2024) is a refreshed assessment of general employment land requirements for	See amendment above proposed response to Rep. 185.	204	Paul Fovargue

MAIN ISSUES RAISED [General Employment]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
<p>since 2020, demand growth has been fuelled by growth in e-commerce and structural changes to operating practices in both the industrial and logistics sectors (e.g. 'Just-in-Case' instead of 'Just-in-Time' practices and re-shoring since Brexit). Whilst the market has steadied, with developers and investors taking a more cautious approach because of the hike in interest rates, demand levels from occupiers remain healthy.</p> <p>3 - Take up of industry/warehousing in NWL has been nearly half of that for the county as a whole. Both Stantec and the Strategic B8 study fall grossly short of historic demand.</p> <p>4 - This shows that there is strong evidence of long term economic demand for industrial and logistics space in NWL and the district holds a predominant position compared to the County at a whole. In light of this, we would encourage the local authority to update the evidence informing Policy S1(2) and (3) and express any employment floorspace targets under Policy S1 as a minimum at the least</p>	the period 2024-2040.			
1 - It is critical that these need figures [for general employment needs] are fully evidenced and justified via up to date evidence to take into account the	1 – The Employment Land Update Report (2024) is a refreshed assessment of general employment land requirements.	See amendment above proposed response to Rep. 185.	214	Bloor Homes Midlands and Taylor Wimpey Strategic Land

MAIN ISSUES RAISED [General Employment]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
changes in the market and working patterns post Covid.				
<p>1 - office requirement should be 59,570sqm not 59,590sqm as stated.</p> <p>2 - Given the ever-changing nature of employment requirements, it is considered that there should be no maximum requirement for office uses in the Plan. This would help to ensure the Plan meets the test of soundness with regard to being positively prepared and consistent with national policy.</p> <p>3 - B8 study fails to consider strategic B2 needs</p>	<p>1 - No change in response to this specific comment although the Employment Land Update Report (2024) provides a refreshed assessment of general employment land requirements to 2040.</p> <p>2 -The office requirement is expressed as 'at least' figure in the Update report. Policy S1 to be amended accordingly.</p> <p>3 – The update report confirms that the industrial requirement includes all industrial need, including for larger scale units.</p>	See amendment above proposed response to Rep. 185.	215	Secretary of State for Transport (HS2)
<p>1 - an average plot ratio of 40% is unachievable if used as a conversion factor to arrive at a gross requirement. The representations suggested that if it was to be applied, then it must be made clear it yields a net land requirement, what that requirement represents (i.e. specifying what is excluded), and allocations made accordingly. It was noted that this would require an assessment of the likely net developable area of allocations to ensure this net requirement can be</p>	<p>1 - The Council's consultants confirm that 40% is a reasonable rule of thumb to use for estimating land requirements. The Council has applied a more specific, locally derived ratio to its actual site allocations which should give more certainty that the specified amount of floorspace can be achieved. This is explained in the Employment Topic Paper.</p> <p>2 -The employment land element of the Money Hill allocation will be considered in a future Committee</p>	No specific change in response to this representation although changes are proposed to the employment land requirements arising from the Update report.	225	St Modwen Logistics

MAIN ISSUES RAISED [General Employment]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
<p>met, or there would be a significant risk of insufficient provision being made. Land allocations should be on the basis of a realistic ratio. 40% is used in Table 4 in the consultation document and at paragraph 4 in the Topic Paper.</p> <p>2 - Recognise that the employment element of Money Hill will not come forward and perhaps allocating it for another use, or ensuring sufficient additional land is allocated such that if it does continue to stall this part of the requirement is not left unmet.</p> <p>3 - Stantec does not make any adjustment for pent up demand (see pages 3-4 of submission)</p> <p>4 - no account of the need for Strategic B2 - smaller than B8 but significant and important to the economy.</p> <p>5 - there are serious concerns with the extent to which the evidence base properly and fully identifies the requirement for employment land. A common theme between the approach to the non-strategic and strategic sectors is the question of suppressed demand.</p>	<p>report dealing with the site-based representations.</p> <p>3 & 5 - The Employment Land Update Report (2024) is a refreshed assessment of general employment land requirements. The Council's consultants advise that the method used is 'soundly based'.</p> <p>4 - The Update report confirms that the industrial requirement includes all industrial need, including for larger scale units.</p>			
[raises the same issues as Representation 225]	[as for 225]	No specific change in response to this representation although	229	P, W, C & R Redfern

MAIN ISSUES RAISED [General Employment]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
		changes are proposed to the employment land requirements arising from the Update report.		
Employment evidence documents (Review of EEAs; Stantec; Start up workspace; Strategic B8 study) generally out of date given impact of Covid 19 on employment patterns.	The Employment Land Update Report (2024) is a refreshed assessment of general employment land requirements.	See amendment above proposed response to Rep. 185.	233	MAG Property
Employment land requirements lack supporting data and justification	The employment land requirements in the draft plan draw on published evidence documents, specifically the Need for Employment Land Report (2020) (with a recent update) and the Strategic Distribution Study (2021). The latter was prepared jointly with the other Leicester & Leicestershire authorities. These expert reports contain the data analysis and reasoning needed to estimate the amounts of employment land required in the future.	No specific change in response to this representation although changes are proposed to the employment land requirements arising from the Update report.	285 376 401	Garry Needham Jim Snee Mr Wykes
75% of the calculated office/ warehousing requirement for all of the NWLDC region is destined for Kegworth, Castle Donington and Isley Woodhouse all within 1 mile of East Midlands Airport. This is an incredible overloading on one small area and from an employment point of view is	Proposed sites for general needs employment are located at Ellistown and Oakthorpe (near Measham) in addition to Kegworth, Castle Donington and at the new settlement in the longer term. Together with the allocated employment land at Money Hill,	No specific change in response to these representations.	285; 405;115	Garry Needham; Northern Parishes; Protect Diseworth

MAIN ISSUES RAISED [General Employment]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
unfair to the rest of the county. Employment opportunities should be distributed evenly and fairly across the region - to where people live in their existing communities. NWLDC must review this proposed strategy.	Ashby, the proposals provide a reasonable spread and choice of locations across the district. For strategic warehousing, there is a focus on the north of the district. Key drivers for this are a) good road connections. The A50, M/A42, M1 and A6 all converge and connect here; b) rail freight terminal at East Midlands Gateway; c) East Midlands Airport for cargo; d) local labour supply in Derby and Nottingham.			
Provision of office space seems high although 7.11 details specific factors that could curtail office demand including the number of people working from home.	The Employment Land Update Report (2024) is a refreshed assessment of general employment land requirements. This shows modest decrease in the overall office requirement which reflects recent experience.	No specific change in response to this representation.	289	Swannington Parish Council
1 - There is strong demand for land and premises for both freehold and leasehold, and across a range of unit sizes and tenures, although the size band for industrial premises leans towards the mid-to-large box. According to the latest Market Insight 2024 by Innes England, the industrial market across Leicester and Leicestershire continues to deliver strong results, with good occupier	1,2,4 – noted 3 – The Employment Land Update Report (2024) is a refreshed assessment of general employment land requirements.	See amendment above proposed response to Rep. 185.	341	Leicestershire CC

MAIN ISSUES RAISED [General Employment]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
<p>demand, rising rents, generating the confidence for developer and investor support with new supply. Take-up in the Leicester and Leicestershire industrial market remained above the 10-year average for the fourth successive year in 2023, with total activity of 2.7m sq ft. The 'Big Box' market continued to see good levels of activity, with six deals totalling 1.25m sq ft. Much of this growth is driven by our area's strong connectivity to road, rail and air. Available Grade A space fell slightly to 1m sq ft, although there are several large-scale units coming forwards in the south of Leicestershire. As such, the protection of sites for employment uses across NWL is particularly important in this context, especially industrial.</p> <p>2 - The County Council is interested in the provision for employment land, support for local businesses and the integration of new developments with existing infrastructure to foster economic resilience and growth.</p> <p>3 - Whilst the approach to the estimation of employment land needs is logical the evidence supporting the overall requirements for employment land over the plan period is based on historic data and may have over-</p>				

MAIN ISSUES RAISED [General Employment]	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
<p>estimated the requirement for office space given the changes in working practices and subsequent downturn in demand post-COVID. However, if the overall employment land requirement is maintained (excluding strategic distribution) the opportunity will be provided to respond to future changes in market conditions and future increased economic activity.</p> <p>4 - Further, the approach in respect of strategic B8 is seen as appropriate and takes account of the market and demand across the wider economic area.</p>				

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CHAPTER 4	POLICY NUMBER – S2	POLICY NAME -SETTLEMENT HIERARCHY
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MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
<p>4.25 - The text says ‘Some development in these settlements will be appropriate. Any further development in such settlements will be restricted to either infilling or PDL which is well related to the settlement concerned’. It is unclear as to which types of settlement this text refers to and the wording included in this paragraph does not appear within the actual policy wording. It is suggested that this wording should be removed or clarified to avoid confusion. For example, one would expect equestrian uses to be acceptable in all rural locations across the district but the wording within this paragraph suggests that it would need to be on PDL or be infill development. If this policy is referring to residential development then it needs to be more precise.</p> <p>4.26 - This paragraph should also make it clear that the provision of additional services in settlements should also be a material consideration.</p>	<p>This paragraph is concerned with Sustainable Villages. Some rewording would provide additional clarity.</p> <p>In the settlement hierarchy all settlements upwards of Sustainable Villages are already regarded as being sustainable and hence potentially suitable for some form of development. Part (3) only applies to Sustainable</p>	<p>At start of paragraph amend to state " Outside of those settlements listed in paragraph 4.22.." . Insert "We term these as Sustainable Villages" after "on a much lesser scale"</p> <p>Reword to state "Any further <u>housing or employment</u> development in such settlements .."</p> <p>Insert the following into policy as (4) "If during the plan period any of the Local Needs Villages gains facilities</p>	8	JJM Planning

<p>4.26 - Draft Policy S2 (3) - needs to also recognise that some other settlements may gain services which allows them to move up the hierarchy.</p> <p>4.26 - Draft Policy S2 - refers to 'significant' and 'limited' amounts of development which is open to interpretation and imprecise.</p>	<p>Villages. Its purpose is to ensure that in the event that services or facilities are lost such that these settlements are no longer sustainable, then this can be reflected in decision making. Allowing for movement between the various levels of the sustainable settlements would reduce certainty and in effect make the settlement hierarchy potentially meaningless. However, it is accepted that there may be exceptional circumstances whereby a Local Needs Village could gain a level of services and facilities such that it would accord with a Sustainable Village.</p> <p>These terms are considered appropriate as it will depend upon the individual circumstances at the time that a planning application is determined. The alternative would require a level of prescription that is not considered to be appropriate.</p>	<p>and services to the extent that they would meet the requirements for a Sustainable Village, this will be a material consideration in the determination of planning applications in these settlements"</p>		
<p>Object to downgrading of Coleorton Lower Moor Road to a Local Needs Village. Both the school and the George Public House are within walking distance, albeit outside of Lower Moor Road. The Lower Moor</p>	<p>Since the evidence base was prepared the store in Coleorton has closed. This means that there are no services or facilities on Lower Moor Road itself, whilst the school and the George Public House are located some distance</p>	<p>No change</p>	<p>21</p>	<p>Harris Lamb o/b/o Owl Homes</p>

Road has sufficient facilities to make it sustainable.	away. As such this does not constitute a sustainable settlement.			
Our client supports the settlement hierarchy as set out in Policy S2. Sustainable Villages can accommodate limited growth; this is supported. We also agree that Packington is a Sustainable Village which can accommodate limited growth. The development of site reference P4 would represent limited growth in Packington.	Noted	No change	65	Stone Planning Services Ltd o/b/o Peveril Homes
Support	Noted	No change	92	Ashby de la Zouch Town Council
The hierarchy should be amended for Appleby Magna in view of its proximity to Mercia Park which will create about 3,000 new jobs. To date insufficient weight has been attached to this factor, compared to growth at the Leicestershire International Gateway.	Appleby Magna itself has a limited range of services and facilities. Whilst it is suitable for some development it does not compare to the next level up in the settlement hierarchy (Local Service Centres). The amount of employment growth at Mercia Park does not compare favourably with that at the Gateway, which is identified as growth area in the Strategic Growth Plan.	No change	130	Fisher German o/b/o Richborough
The relative sustainability of Ravenstone is undervalued as the settlement hierarchy fails to acknowledge the proximity to Coalville, the principal town in the district. Parts of the Coalville Urban	Whilst Ravenstone is close to the Coalville Urban Area, it is physically separate from the Coalville Urban Area, whereas Thringstone and the other parts of the Coalville Urban Area are	No change	136	Fisher German o/b/o William Davis Homes

Area, such as Thringstone, are further from services and facilities than Ravenstone. There are also good public transport links to Coalville.	physically indivisible from each other.			
LCC supports the establishment of a settlement hierarchy (Draft Policy S2), and that housing supply will be supported by Local Needs Villages as a strategy for housing growth.	Noted	No change	139	Leicester City Council
The status of Appleby Magna in the settlement hierarchy is supported.	Noted	No change	144	Marrons
Support focussing development in most sustainable settlements and development should be spread across the hierarchy to ensure that smaller settlements do not stagnate. Policy should address what would happen if a new development also proposed a new service which would make a settlement more sustainable.	Allowing for movement between the various parts of the settlement hierarchy would reduce certainty and in effect make the settlement hierarchy potentially meaningless.	No change	147	Gladman Developments Ltd
Support the identification of Coaville as the Principal Town, but question why more development is proposed at Ashby de la Zouch and Castle Donington which are identified as Key Service Centres in the hierarchy. Object to the lack of any allocation at Measham	<p>Whilst the overall scale of growth across the two Key Service Centres is more than in Coalville, individually the scale of growth is less.</p> <p>Whilst there are no new allocations at Measham, there is provision as land west of High Street has permission for about 450 dwellings.</p>	No change	150	Savills o/b/o David Wilson Homes
We note Long Whatton is identified as a sustainable village within the settlement hierarchy and would agree with this identification; however, we	Part (1) of the policy already refers to development being proportionate to the scale and	No change	161	Mather Jamie

<p>would suggest the wording is changed from “limited amount of growth” to “proportionate amount of growth” to ensure schemes which need to be of a sufficient scale to offer the delivery of affordable housing or other community infrastructure are supported in delivering such benefits to these settlements.</p>	<p>character of the settlement concerned.</p>			
<p>Breedon on the Hill forms part of the Leicestershire International Gateway. This should be reflected by elevating the status of Breedon on the hill or alternatively its unique location and the role it can play in delivering new homes should be recognised. The current approach requires further refinement to ensure sustainable settlements located within an area of strategic regional importance are not unnecessarily restricted when they can make vitally important contributions to meeting housing needs</p>	<p>The Leicestershire International Gateway and is one of a number of growth areas identified in the Strategic Growth Plan and is a broad area encompassing parts of North West Leicestershire and Charnwood. It includes large urban areas such as Coalville, Shepshed and Loughborough as well as Castle Donington and Kegworth. Whilst Breedon on the Hill is included in the Gateway area, it remains a free-standing settlement with a limited range of services and facilities. Significant provision is made for new housing and employment development elsewhere within this area as part of the plan, including the proposed new settlement at Isley Woodhouse and as well as significant growth at larger settlements such as Coalville, Castle Donington and Kegworth.</p>	<p>No change</p>	<p>172</p>	<p>Fisher German o/b/o Cora</p>

<p>Our client notes and supports the identification of Ashby as a sustainable settlement and consider it to be capable of absorbing additional levels of growth than that already proposed, particularly if there is an increase in housing requirement or a need to ameliorate any housing shortfall due to the application of a more realistic delivery assumption for the Isley Woodhouse new settlement. As demonstrated by the Council's Settlement Study (2021) Ashby also benefits from a range of services and facilities, thus many needs can be met within the settlement. Moreover, Ashby de la Zouch is demonstrably the second most sustainable settlement and could reasonably serve a spatial role above Castle Donington in terms of housing provision</p>	<p>Noted</p>	<p>No change</p>	<p>174</p>	<p>Fisher German o/b/o Mr R Botham</p>
<p>ODAPC disputes Donisthorpe's categorisation as a sustainable village as the Village Store has closed permanently and been converted into residential accommodation. Oakthorpe – needs improved infrastructure and access to local doctors in Measham.</p>	<p>The loss of the shop in Donisthorpe is noted. However, it would still score well against the settlement methodology such that it would be considered to be a Sustainable Village. Oakthorpe scores similar to other settlements which are identified as Sustainable Villages.</p>	<p>Update settlement study</p>	<p>175</p>	<p>Oakthorpe, Donisthorpe & Acresford Parish Council</p>

<p>Whilst support the assessment of settlements and the use of a hierarchy, it is suggested that Ravenstone should be reconsidered due to its location in close proximity to the Coalville Urban Area. The status of the new settlement at Isley Woodhouse in the hierarchy needs to be clarified.</p>	<p>Whilst Ravenstone is close to the Coalville Urban Area, it is physically separate from the Coalville Urban Area, whereas Thringstone and the other parts of the Coalville Urban Area are physically indivisible from each other.</p> <p>In respect of Isley Woodhouse it is agreed that as the new settlement at Isley Woodhouse does not, as yet, exist, its inclusion in the settlement hierarchy is inappropriate.</p>	<p>Delete Isley Woodhouse from the Settlement Hierarchy</p>	<p>182</p>	<p>Boyer Planning o/b/o Redrow Homes</p>
<p>Do not agree that Ashby de la Zouch and Castle Donington should both be designated as Key Service Centres. Instead, Castle Donington and the surrounding area should sit between the Principal Town and Key Service Centre in view of its strategic importance in respect of the employment growth that is anticipated.</p>	<p>In considering the status of individual settlements in the settlement hierarchy regard is had to a wide range of services and facilities. Whilst it is the case that Castle Donington and the surrounding area host a significant number of jobs, Ashby de la Zouch has bigger offer in terms of shopping and related services, including a leisure centre., as well as there being a larger population. Therefore, it is considered that they both can be regarded as key Service Centres.</p>	<p>No change</p>	<p>183</p>	<p>Turley o/b/o Clowes Developments, Redrow Homes Ltd and Wilson Enterprises Ltd</p>
<p>Ashby de la Zouch should be identified as a Main Town to separate it out from Castle Donington. The range and type of services in Ashby de la Zouch and Castle Donington are</p>	<p>In considering the status of individual settlements in the settlement hierarchy regard is had to a wide range of services and facilities. Whilst it is the case that</p>	<p>No change</p>	<p>184</p>	<p>Pegasus Group o/b/o Hallam Land Management</p>

<p>similar, but the number of services in Ashby de la Zouch is much greater so provides more choice. For example, there are 6 convenience stores compared to 3 in Castle Donington, 5 primary schools compared to 3, 2 secondary schools and more dentists, chemists and opticians. In the settlement study, Ashby de la Zouch scores more points than Castle Donington (23 as against 20). Ashby de la Zouch is also home to larger population</p> <p>Furthermore, the range of services and facilities is not that much less than the Coalville Urban Area, which comprises a number of linked settlements which distorts the findings in the settlement hierarchy.</p>	<p>Castle Donington and the surrounding area host a significant number of jobs, Ashby de la Zouch has a bigger offer in terms of shopping and related services, including a leisure centre, as well as there being a larger population. Therefore, it is considered that they both can be regarded as key Service Centres. Whilst it is recognised that Ashby de la Zouch has a good range of services and facilities, the Coalville Urban Area has a much larger population which does function as single settlement.</p>			
<p>Support the status of Measham in the settlement hierarchy, but concerned that the distribution of site allocations do not appropriately reflect the settlement hierarchy.</p>	<p>Support is noted. In terms of the scale of allocations, whilst no new allocations are proposed in Measham, there is provision as land west of High Street has permission for about 450 dwellings.</p>	<p>No change</p>	<p>187</p>	<p>Define Planning & Design Ltd</p>
<p>We fully support the principle of the Settlement Hierarchy, as set out in proposed policy S2. It is vitally important for the Council to increase the level of housing delivery further down the settlement hierarchy to meet local needs within the villages and rural settlements to assist in the</p>	<p>Noted</p>	<p>No change</p>	<p>188</p>	<p>C. Green Planning</p>

retention of key services – which may be lost if future development is not directly appropriately – and to attract new services and facilities into the community.				
Support the identification of Measham as a Local Service Centre, but object to the lack of flexibility in Sustainable Villages such as Appleby Magna which would allow for development that could enhance or provide new infrastructure rather than simply maintaining the current infrastructure provision.	Appleby Magna itself has a limited range of services and facilities. Whilst it is suitable for some development it does not compare to the next level up in the settlement hierarchy (Local Service Centres). In order to support the level of services and facilities that would justify a change of status in the hierarchy, it is likely that a amount of growth required would be out of keeping with the existing character of Appleby Magna.	No change	193	Pegasus Group o/b/o Hall Land Management
Support the identification of the Coalville Urban Area as the Principal Town. However, consider that the status of the new settlement at Isley Woodhouse should be reconsidered as there are no services, facilities or infrastructure.	It is agreed that as the new settlement at Isley Woodhouse does not, as yet, exist, that its inclusion in the settlement hierarchy is inappropriate. However, part (2) of the policy is required to explain that it is an exception to the hierarchy policy. Future Local Plans will need to consider where it lies in the settlement hierarchy (or similar).	Delete Isley Woodhouse from the Settlement Hierarchy	195	Marrons o/b/o William Davis
Object. Draft Policy S2 should be modified to allow communities the opportunity to apply the Settlement Hierarchy flexibly, through neighbourhood plans.	The role of the Local Plan is to set out key strategic policies, such as policy S2. If such matters were left to Neighbourhood Plans then there would not necessarily be a	No change	196	Breedon on the Hill Parish Council

	consistent approach across the district.			
Object to the status of Newbold as a Local Needs Housing Village (LNHV). The methodology used does not take account of quality of service. Newbold is the largest of the LNHV and benefits from a primary school which is a key asset in the village which should be given greater weight, there is also a large employment area to the north-east of the village. A contrast is made with Albert Village.	There are limited services in Newbold (primary school, public house, some employment outside the village and informal recreation area). There is a very limited bus service. Albert Village has similar services and facilities, but it benefits from a regular service to Ashby de la Zouch, Swadlincote and Burton upon Trent	No change	206	Pegasus Group o/b/o Taylor Wimpey
The recognition of Ibstock as a sustainable location for additional growth over the plan period is supported.	Noted	No change	211	Pegasus Group o/b/o Davidsons
Welcome the recognition of Ashby-de-la-Zouch as a Key Service Centre and that a significant proportion of development will take place here.	Noted	No change	214	Stantec UK Ltd o/b/o Bloor Homes Midlands and Taylor Wimpey Strategic Land
Policy S2 states that the strategy of the plan is to direct new development to appropriate locations within the Limits to Development or exceptionally to the proposed new settlement Land South of East Midlands Airport (Isley Woodhouse). It fails, in its wording, to refer to allocations outside of the Limits to Development. It is therefore considered that the policy wording should be amended to include	It is considered that part 1 of the policy should be amended to also include "and other policies of this plan" after "settlement hierarchy below". The supporting text will need to be amended to provide clarification as to which policies are relevant.	Insert "and other policies of this plan" after "settlement hierarchy below". Amend supporting text to refer to policies H2, H3, Ec2 , Ec3 and Ec5	215	Carter Jonas o/b/o Secretary of State for Transport

allocated sites outside of the Limits to Development or the emerging Policy Map should amend the Limits to Development to encompass the allocations.				
Support the status of Whitwick and Donsithorpe in Settlement Hierarchy	Noted	No change	216	Pegasus Group o/b/o Westernrange
Support the identification of Coalville as the Principal Town. Note the status of Blackfordby, but it is not clear why services and facilities in Ashby de la Zouch and Swadlincote do not have a more positive weighting. For example, schools in Ashby de la Zouch. A more robust approach is required	The methodology seeks to take a balanced approach. So, for example, account is taken of accessibility by public transport to higher order centres and hence a greater range of services and facilities, but also takes account of what is available within each settlement. In the case of Blackfordby, there are limited services in the village itself, but it benefits from direct and regular public transport links to both Ashby de la Zouch and Swadlincote.	No change	219	Marrons o/b/o David Wilson Homes
The policy should be changed so that new development only occurs in places which have a wide range of facilities and which offer an attractive and genuine choice of transport options. That should only include the Principal Town and Key Service Centre classifications. Part (2) should be removed until it can be demonstrated that a new settlement can be delivered which is viable and provides the necessary facilities,	The methodology seeks to take a balanced approach to ensure that the plan supports the creation of a sustainable pattern of development as required in the NPPF (paragraph 11). Limiting new development to the top two tiers of the hierarchy would put an unreasonable strain on services and facilities in those settlements. It would also result in the stagnation of other settlements	No change	220	CPRE Leicestershire

including genuine attractive choices of transport. The policy needs to specify what the requirements are for a village to be regarded as a Sustainable Village.	contrary to the NPPF (paragraph 83) which refers to locating housing "where it will enhance or maintain the vitality of rural communities". In terms of Sustainable Villages, as set out in the settlement study a range of factors are considered; there is no one service or facility that outweighs others.			
Support the identification of Donington -le-Heath as part of the Coalville Urban Area	Noted	No change	221	Marrons o/b/o Williams Homes
As framed Draft Policy S2 is misleading. It refers to the strategy being to direct new development to locations within the Limits to Development or, exceptionally, to the proposed new settlement. In fact, the emerging Plan also, appropriately, includes other allocations that are and will remain outside Limits to Development and also (Draft Policy Ec4 alongside Draft Policy S4) allows for the prospect of employment development in the Countryside. This should be referred to and reflected in Policy S2, i.e., reflecting that the strategy is to direct development to the Limits of Development, and the new settlement, and allocated sites, and other locations where the relevant criteria are met.	It is considered that part 1 of the policy should be amended to also include "and other policies of this plan" after "settlement hierarchy below". The supporting text will need to be amended to provide clarification as to which policies are relevant.	Insert "and other policies of this plan" after "settlement hierarchy below". Amend supporting text to refer to policies H2, H3, Ec2 , Ec3 and Ec5	225	Planning Prospects Ltd o/b/o St Modwen Logistics
We agree with the Settlement Hierarchy, as set out through Draft	Noted	No change	226	Oxalis Planning and Pegasus

<p>Policy S2, insofar as it identifies that a large amount of growth will take place at the New Settlement of Isley Woodhouse, throughout the Plan Period and beyond. Delivery at Isley Woodhouse presents the opportunity to diversify housing supply options and provide continuity of delivery across the Plan Period.</p>				<p>Group East Midlands o/b/o Harworth Estates and Caesarea</p>
<p>As framed Draft Policy S2 is misleading. It refers to the strategy being to direct new development to locations within the Limits to Development or, exceptionally, to the proposed new settlement. In fact, the emerging Plan also, appropriately, includes other allocations that are and will remain outside Limits to Development and also (Draft Policy Ec4 alongside Draft Policy S4) allows for the prospect of employment development in the Countryside. This should be referred to and reflected in Policy S2, i.e., reflecting that the strategy is to direct development to the Limits of Development, and the new settlement, and allocated sites, and other locations where the relevant criteria are met.</p>	<p>It is considered that part 1 of the policy should be amended to also include "and other policies of this plan" after "settlement hierarchy below". The supporting text will need to be amended to provide clarification as to which policies are relevant.</p>	<p>Insert "and other policies of this plan" after "settlement hierarchy below".</p> <p>Amend supporting text to refer to policies H2, H3, Ec2 , Ec3 and Ec5</p>	<p>229</p>	<p>Planning Prospects Ltd o/b/o P W C Redfern</p>
<p>The proposed settlement hierarchy set out in the draft policy is supported. But this is except for a proposed new settlement (Isley Woodhouse – Land south of East Midlands Airport. Whilst the concept of a new settlement in the</p>	<p>These comments are more appropriately considered as part of the proposed allocation.</p>	<p>No change</p>	<p>230</p>	<p>East Midlands Airport</p>

<p>district is recognised, the Isley Woodhouse location, that is close to the airport, affected by its activity and potentially compromising its growth, is unsustainable and unsound in planning and local amenity terms.</p>				
<p>The settlement hierarchy fails to consider Kegworth's strategic location in proximity to a range of employment opportunities and access to public transport. Kegworth should be a focus for development and it is a failing of the plan to not direct any growth to it. Kegworth and other established settlements should sit above Isley Woodhouse in the settlement hierarchy which will only become sustainable once services and facilities are provided. As such, Isley Woodhouse should form no part of the hierarchy.</p>	<p>Whilst Kegworth is well placed for employment opportunities and with good public transport, the range of services and facilities is not as great as the higher order settlements. Whilst there are no allocations included in the draft plan for Kegworth, permission is in place for two sites off Derby Road and the Ashby Road which can accommodate xxx dwellings.</p> <p>It is agreed that as the new settlement at Isley Woodhouse does not, as yet exist, that its inclusion in the settlement hierarchy is inappropriate.</p>	<p>No change</p>	<p>232</p>	<p>Stantec UK Ltd o/b/o Caddick land</p>
<p>Draft Policy S2 – Settlement Hierarchy identifies Ibstock as one of three Local Service Centres. Paragraph 4.23 of the proposed policies consultation document sets out that these six settlements form the central part of our settlement hierarchy and will accommodate the vast majority of new development. The recognition of Ibstock as a sustainable location for additional</p>	<p>Noted</p>	<p>No change</p>	<p>235</p>	<p>Pegasus Group o/b/o Davidsons and Westernrange</p>

growth over the plan period is supported.				
The HBF considers that it is important that the spatial distribution of sites follows a logical hierarchy, provides an appropriate development pattern and supports sustainable development within all market areas. The HBF considers that the Council's proposed approach to the distribution of housing should ensure the availability of a sufficient supply of deliverable and developable land to deliver the housing requirement.	Noted	No change	237	Home Builders Federation
<p>Policy S2 goes beyond describing the settlement hierarchy in the District; it articulates the Council's spatial strategy. Accordingly, it should be headed 'Spatial Strategy'</p> <p>The Policy or the supporting text to it needs to be clear about how the allocations the Council is proposing to make reflect the spatial strategy that it has resolved to pursue.</p> <p>The distribution of development does not reflect option 7b.</p>	<p>The term 'spatial strategy' is not on that is easily understood. However, it is agreed that the policy does describe the strategy of the plan. Therefore, the policy should be retitled 'The Development Strategy'.</p> <p>Noted. This will be addressed as part of the Regulation 19 plan.</p> <p>This matter is more appropriately addressed in a future report in respect of proposed allocations.</p>	Change policy title to 'The Development Strategy'.	243	Avison Young o/b/o Jelson Homes
Support the settlement hierarchy set out in Draft Policy S2, which is informed by the relative sustainability of villages within NW Leicestershire.	As part the development of the plan, a range of options were considered, including an option of more growth in Sustainable	No change	245	Evolve Planning o/b/o Bloor Homes

<p>However, the restrictive approach of the policy to planned growth means that in time services and facilities in Sustainable Villages will gradually decline. The amount of growth in Sustainable Villages should be increased to support and maintain services and facilities. Further growth will also support the provision of more affordable housing.</p>	<p>Villages. However, it did not perform as well as the proposed approach. The proposed approach plans positively by allocating some development in most Sustainable Villages.</p>			
<p>Support the settlement hierarchy set out in Draft Policy S2, which is informed by the relative sustainability of villages within NW Leicestershire. However, the restrictive approach of the policy to planned growth means that in time services and facilities in Sustainable Villages will gradually decline. The amount of growth in Sustainable Villages should be increased to support and maintain services and facilities. Further growth will also support the provision of more affordable housing. The strategy also fails to take account of other local issues. Appleby Magna has suffered from a number of flood events. Land at Top Street provides an opportunity to help alleviate this problem.</p>	<p>As part the development of the plan, a range of options were considered, including an option of more growth in Sustainable Villages. However, it did not perform as well as the proposed approach. The proposed approach plans positively by allocating some development in most Sustainable Villages.</p> <p>The Settlement Hierarchy is largely concerned with the relative sustainability of individual settlements having regard to access to services and facilities. Issues pertaining to flooding are site specific</p>	<p>No change</p>	<p>256</p>	<p>Evolve Planning o/b/o Cameron Homes</p>
<p>Castle Donington and Ashby de la Zouch are both categorised as Key Service Centres. They are, however, clearly and fundamentally different in terms of the services and facilities available, with Ashby de la Zouch</p>	<p>Whilst Ashby de la Zouch does benefit from both more retail and leisure opportunities than Castle Donington, the latter benefits from the significant employment opportunities in and around the</p>	<p>No change</p>	<p>277</p>	<p>Castle Donington Parish Council</p>

having a much greater range including a greater retail and leisure offer and the infrastructure can cope, unlike in Castle Donington.	town, as well as a better level of public transport provision. Castle Donington is also within the Leicestershire International Gateway growth area identified in the Strategic Growth Plan for Leicester and Leicestershire.			
We agree, in general terms, with the approach taken to arrive at the settlement hierarchy	Noted	No change	280	Marrons o/b/o Richborough
Swannington – any further development will be restricted to infilling or the use of previously developed land.	Noted	No change	289	Swannington Parish Council
The villages of Diseworth, Long Whatton and Breedon on the Hill are all defined as “Sustainable Villages”. Tonge and Isley Walton are classed as “Hamlets”. Para 4.24 refers to a completely new settlement of Isley Woodhouse. The policy treats all these settlements as independent. There is no mention of what effect the new settlement of Isley Woodhouse will have on the existing settlements. Removing the greenspace agricultural land that separates the settlements will undoubtedly have an effect on the settlements and their inhabitants. This new proposed settlement was a surprise to most people within the area. It was not mentioned in any previous plans or policies. Where did this proposal for a new settlement	The provision of a new settlement will help to relieve pressure on existing settlements such as Diseworth and Long Whatton and enable them to remain as free standing, small scale settlements.	No change	336	Local Resident (Kevin Walker)

originate from and why has there been no public consultation (that we are aware of) regarding it? And yet it now appears in the draught local plan as if it is a done deal and will happen.				
There appears to be no alignment with the Strategic Growth Plan and no context or rationale is provided for the proposed new settlement. It would be helpful if the plan articulated where it is anticipated that the new settlement would sit in the hierarchy once completed. Consideration should be given to whether Ashby de la Zouch should be higher up the settlement hierarchy, possibly as a Principal Town given its greater range of services and facilities than Castle Donington.	Whilst Ashby de la Zouch does benefit from both more retail and leisure opportunities than Castle Donington, the latter benefits from the significant employment opportunities in and around the town, as well as a better level of public transport provision. Identifying Ashby de la Zouch as a Principal Town alongside the Coalville Urban Area would not be appropriate, having regard to the size and range of services and facilities in the latter. The status of Castle Donington in the settlement hierarchy reflects its location within the Leicestershire International Gateway growth area identified in the Strategic Growth Plan for Leicester and Leicestershire.	No change	341	Leicestershire County Council
2. Isley Woodhouse should not be made an exception. It is in the wrong place.	Noted	No change	352	Local Resident (Jeffrey Guy)
From the 2022 consultation we understood that a new settlement option was ruled out at that time. We note that the current consultation advises the Council took the decision in September 2022 to agree Option	The potential of a new settlement was included in the majority of the development strategy options consulted upon in January to March 2022.	No change	357	Historic England

<p>7b as the preferred development strategy and that option includes a new settlement. From the information available in the current consultation documents we understand a new settlement is being proposed and is referred to as Isley Woodhouse. Historic England has concerns about the potential harm of the proposed settlement on the significance of heritage assets contained within the site and nearby as a result of setting impacts. The site would comprise much of the monastic landscape associated with the outstanding St Mary and St Hardulph Priory Church, Breedon on the Hill (GI listed building and associated hill fort scheduled monument) and Langley Priory (GII* listed building). Nearby Conservation Areas and various nearby Listed Buildings would, potentially, also be affected by the proposed settlement. It is unclear from the information available how this settlement option has been taken forward as a preferred option. Nor is it clear how the anticipated level of development could be achieved - is the Council satisfied that the proposal is developable and deliverable?</p>	<p>The concerns regarding the potential impact upon heritage assets is noted but is more appropriately addressed in a future report in respect of proposed allocations.</p>			
<p>Local plan consultation S2 Settlement hierarchies. Some councils with very rural areas are using settlement sharing policies to include smaller</p>	<p>Policy S3 recognises that some small scale development to meet a local need may be appropriate in those settlements which have a</p>	<p>No change</p>	<p>381</p>	<p>Local resident (Robert Adey)</p>

<p>with bigger settlement/s to effectively create a team to give a bit of development to these communities to keep all of them improving not at risk of deteriorating as highlighted In Country Landowner reports of rural community problems and their suggestions to improve them .Most of North West Leicestershire is only semi rural with many communities only a short walk away so these rural sharing policies would seem to be easier to implement here. Its the rules but Leicester focussed dominance to decision making compared to much lesser weighting to often much closer but out of district areas frustrates many as it can make cohesion challenging locally.</p>	<p>limited range of services and facilities.</p>			
<p>Support the identification of Woodville as Sustainable Village but object to the lack of any allocations. Are promoting land for housing development which it is not proposed to allocate, partly because sites in Neighbourhood plan areas are sieved out, an approach that is not supported.</p>	<p>The majority of the site being promoted is included within the proposed Limits to development.</p> <p>The issue of the omission of a site will be addressed in a future report in respect of proposed allocations.</p>	<p>No change</p>	<p>392</p>	<p>CORA</p>
<p>The sentence describing Sustainable villages is incomplete. The hierarchy table is likely to lead to some confusion as villages are mentioned and the boundaries for these is not clear, unlike for example, Parish boundaries.</p>	<p>The description of Sustainable Villages should be amended to include " will take place" at the end of the sentence. The boundaries for the various settlements are defined as the Limits to Development</p>	<p>Amend the wording of Sustainable Villages to include " will take place" at the end of the sentence.</p>	<p>396</p>	<p>Local Resident (Siobhan Dillon)</p>

<p>S2 the sustainability hierarchy imposes a glass ceiling on smaller settlements preventing them from much needed development. The policy creates unsustainable settlements rather than trying to lift them and make them vibrant and sustainable. There needs to be stronger support for rural development. Otherwise the Council's objectives will be unmet.</p>	<p>The proposed approach strikes a balance between supporting some development in the most sustainable rural settlements, whilst ensuring that most development takes place in the most sustainable locations.</p>	<p>No change</p>	<p>422</p>	<p>CLA</p>
<p>In relation to the proposed settlement hierarchy and for the purpose of clarification, reference to 'Coleorton' should be accompanied by a specific reference to 'Lower Moor Road' as in the currently adopted Local Plan. In addition, a new paragraph (4) should be added stating:- "If during the plan period, any of the Local Housing Needs Villages were to gain facilities to the extent that they would meet the requirements of a Sustainable Village, this would be a material consideration in the determination of planning applications in these settlements".</p>	<p>it is accepted that there may be exceptional circumstances whereby a Local Needs Village could gain a level of services and facilities such that it would accord with a Sustainable Village.</p>	<p>Insert the following in to the policy as (4) If during the plan period any of the Local Needs Villages gains facilities and services to the extent that they would meet the requirements for a Sustainable Village, this will be a material consideration in the determination of planning applications in these settlements</p>	<p>554</p>	<p>Local Resident (Thomas Redfearn)</p>
<p>Supports the proposed settlement hierarchy, which is based on the 2022 Settlement Study that is itself underpinned by an entirely appropriate methodology that takes account of the services and facilities that are present within each settlement.</p>	<p>Noted</p>	<p>No change</p>	<p>656</p>	<p>Define Planning & Design Ltd</p>

RESPONSES TO PROPOSED POLICIES

CHAPTER: 4	POLICY NUMBER: S3	POLICY NAME: LOCAL HOUSING NEEDS VILLAGES
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MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
[Self-build and custom housebuilding (SBCH) can be secured by a planning condition rather than a Section 106 agreement and the same approach should be used for local needs housing.]	<p>Historically, the Council has opted to secure SBCH via a legal agreement. For consistency, we chose the same approach for local needs housing.</p> <p>Following the enactment of the Levelling Up and Regeneration Act (2023), the government will be publishing regulations which are expected to confirm that planning permissions for SBCH is characterised by a condition or planning obligation¹. It may be that conditions will be suitable for smaller developments of one or two dwellings and that elsewhere, a legal agreement will be required.</p> <p>Whilst we may change our approach to SBCH, we still think a legal agreement is required for local needs housing, as we are proposing a</p>	None	8	JJM Planning

¹ Hansard, Volume 829, Column 1055, 24 April 2023, Levelling-up and Regeneration Bill: House of Lords Committee Stage

	new requirement concerning the sale of LHN which would need to be set out in a S106 agreement.			
Support	Noted	None	92	Ashby Town Council
[Applications cannot be properly scrutinised since the General Data Protection Regulations means that personal information cannot be disclosed.]	It is correct that the policy will have to operate within the confines of the GDPR and personal information will not be made publicly available. However, personal information would need to be shared with planning officers to enable them to decide if the applicant has complied with the policy (this is made clear at paragraph 4.29). There are existing circumstances where officers have to review personal information, for example salaries and proof of address when dealing with the sale of discounted market homes/First Homes.	None	196	Breedon on the Hill Parish Council
[Housing in the Local Housing Needs Villages should be community-led and not by the undisclosed personal requirements of individuals].	The concept of community-led housing was added to the December 2023 version of the National Planning Policy Framework (NPPF). A definition is provided in the glossary of the NPPF and paragraph 70b says that local planning authorities should	Given its inclusion in the latest NPPF, the Regulation 19 version of the Local Plan will need to address community-led housing, possibly as part of Policy H4: Housing Types and Mix .	196	Breedon on the Hill Parish Council

	<p>support small sites to come forward for community-led housing development.</p> <p>The purpose of Policy S3 is to support those with a demonstrable local connection to build their own homes in the Local Housing Needs Villages. Community-led housing is more aligned to self-build but taken forward by a not for profit organisation (such as a community land trust or housing cooperative) to meet the needs of its members. It is likely to deliver housing on a larger scale, albeit sites should not be larger than one hectare in size or exceed 5% of the size of the existing settlement (NPPF, footnote 37).</p>	<p>However, we do not recommend that this should replace the local housing need policy which allows individual homes to be built in the local housing needs villages, subject to certain local connection criteria being met.</p>		
<p>Draft Policy S3 should not be regarded as a 'Strategic' policy.</p>	<p>Strategic policies "<i>address each local planning authorities priorities for the development and use of land in its area</i>" (NPPF paragraph 17). Local Housing Needs Villages are a tier in the settlement hierarchy and this policy relates to the Council's priorities for the pattern and scale of housing development across the District. This is why S3 has</p>	<p>None</p>	<p>196</p>	<p>Breedon on the Hill Parish Council</p>

	been identified as a strategic policy.			
Criterion 3 of Draft Policy S3 is unacceptable. The residency period is too short and doesn't explain what happens if the three year requirement is not met. Any housing secured under this policy should have occupancy restrictions and/or treated as affordable housing to prevent abuse	<p>The Council currently secures the occupancy of approved self-build homes for three years. The Council, therefore, proposed the same approach for local needs housing. If the occupancy terms are not met, then the Council would be able to take enforcement action.</p> <p>The Council has stated in the supporting text (paragraph 4.31) that people's circumstances change over time. It would be unreasonable to restrict the sale of market housing in perpetuity, particularly as the local connection required to get planning permission in the first place is a parish rather than a district one.</p> <p>However, to encourage the sale of homes to those with a local connection, it may be more appropriate to adopt a cascade approach, such as that used with the sale of First Homes.</p>	<p>Add an additional requirement for the sale of local needs housing, similar to that used for the sale of First Homes.</p> <p>See part (3) of the amended policy.</p>	196	Breedon on the Hill Parish Council
We support this policy but Paragraph (3) refers to a period of	As above with regards to the proposed cascade approach.	See part (3) of the amended policy.	220	CPRE Leicestershire

<p>three years. We question whether the wording will be sufficient to "secure the occupancy" of a dwelling for the stated period of three years and in a way that meets longer term local needs.</p>	<p>The legal agreement will be used to tie the applicant to the occupancy of the approved dwelling.</p>			
<p>[The policy should be more flexible to allow for small-scale extensions to Local Housing Needs Villages. This would allow small scale sites to come forward if sites higher up the hierarchy fail to come forward due to unforeseen circumstances.]</p>	<p>The local housing needs villages are treated as countryside and are not deemed suitable for larger scale housing development. This policy is designed to meet a local need where individuals have a demonstrable connection to the parish within which the application site is located. There is sufficient flexibility in the development strategy and further up the hierarchy to deal with unforeseen circumstances.</p>	None	206	Pegasus Group (Taylor Wimpey UK)
<p>(1) (a) The wording "Well-related" lacks clarity and is open to interpretation. We suggest it is replaced with the following "well integrated and in keeping with existing local development".</p>	<p>The term '<i>well-integrated</i>' is also open to interpretation.</p> <p>The supporting text (paragraph 4.32) does provide some guidance on what we mean by well-related: "<i>This will be a matter of judgement in each specific case, but the application site must be in close proximity to and not feel separate or distinct from the</i></p>	<p>It is recommended that we use the term "physically well-related" to ensure consistency with the NPPF. See part (1)(a) of the amended policy.</p>	213	Osgathorpe Parish Council

	<p><i>Local Housing Need Village in question.”</i></p> <p>The NPPF also uses the term ‘well-related’ but qualifies it as ‘physically well-related’.</p> <p><i>‘In keeping with existing development’</i> is certainly a key consideration for housing applications, but it is more of a design matter. What we mean by good design will be covered in the updated Good Design Guide.</p>			
<p>The principle of permitting limited amounts of development in local needs villages is welcomed. However, the policy should not restrict the development of small sites within the built form which enhances or compliments the attractiveness of the area, including the reuse of former agricultural barns or previously developed land.</p>	<p>The conversion of redundant or disused buildings is a use appropriate in the countryside (Policy S4c and Policy S5).</p> <p>It is agreed that as currently written, there is potential for confusion between the relationship between Policies S3, S4 and S5 with regards to what is acceptable in the local housing needs villages.</p>	<p>Reword part 1) of Policy S3 /the supporting text so it is clear that if development comprises: the conversion of redundant buildings for housing, housing for rural workers, or a replacement dwelling, then the local needs tests in Policy S3 do not need to be met. See part (1) of the amended policy.</p>	341	Leicestershire County Council
<p>Policy S3 makes no reference to when or where developments within the Countryside are or should be acceptable. The reference to policy S3 in policy S4 is, therefore, unacceptable as no criteria have</p>	<p>Part (1)(a) specifies that proposals will need to be well-related to the local housing needs village and the supporting text provides further guidance on what this means.</p>	None	335	Michael Bowley

<p>been set out as to when it is appropriate to carry out developments in the Countryside in support of a local need.</p>	<p>The Local Plan cannot anticipate every eventuality and the proposed wording is considered appropriate.</p>			
<p>4.32 says that Local Housing needs Villages do not have limits to development, so understanding the boundaries for each village will be important here.</p>	<p>As the Local Housing Needs Villages are washed over by the countryside and do not have Limits to Development, we have included guidance at paragraph 4.32 of the supporting text which says (<i>our emphasis</i>):</p> <p><i>“As the Local Housing Needs Villages do not have Limits to Development, we expect any new housing to be well-related to the existing settlement. This will be a matter of judgement in each specific case, but the application site must be in close proximity to and not feel separate or distinct from the Local Housing Need Village in question.”</i></p>	None	396	Siobhan Dillon
<p>[The policy should also apply to hamlets such as Charley, at the very least where there are cases of special needs and elderly family].</p>	<p>The strategy for identifying the local housing needs villages is set out in the Council’s Settlement Study.</p>	None	527	Julia Howard

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RESPONSES TO PROPOSED POLICIES

Appendix

CHAPTER: 4	POLICY NUMBER: S4	POLICY NAME: Countryside (Strategic Policy)
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MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENT S ID	RESPONDENT S NAME
[Clarity is required as to whether S4(i) refers to new business; such an approach would be supported by the NPPF. If the policy refers to the expansion of an existing business, then the policy should be re-worded.]	The NPPF (paragraph 88) supports the sustainable growth and expansion of all types of business in rural areas as well as the development and diversification of agricultural and other land-based rural businesses. A change is proposed to the policy wording for clarification.	Add 'new' to (1)(i) and 'existing' to (1)(j).	8	JJM Planning
Equestrian uses should be separately listed as being acceptable in the Countryside as they do not strictly fall under sports and recreation.	Noted. A change is proposed to the policy wording for clarification.	Add 'forestry and equestrian use' to (1)(a).	8	JJM Planning
[S4 is a very important policy. It is our view that the policy needs to be strengthened, as development in the countryside should be avoided wherever possible]. Strengthening can be achieved by • Para 1, line 2 – propose to add “only” before “the uses”.	Adding the word 'only' into part (1) of the policy would result in the policy being negative and overly prescriptive which would not allow flexibility to assess each application on a case-by-case basis.	None.	92	Ashby de la Zouch Town Council
• Para 1 (i). “Expansion of business and enterprise including farm diversification”. The term “farm diversification” needs better, clearer definition of how big an expansion is	In order to support a prosperous rural economy paragraph 88 of the NPPF states that planning policies and decisions should enable:” b) <i>the development and diversification of</i>	Amend criteria (1)(j) by replacing the word 'farm' with 'agricultural'.	92	Ashby de la Zouch Town Council

<p>acceptable and what is an acceptable farm diversification. For instance, would building a warehouse or factory on a farm count as diversification? We would suggest that adding “agricultural” between “farm” and “diversification” could go some way to achieving this.</p>	<p><i>agricultural and other land-based rural businesses</i>”. It is proposed that the policy wording is amended to reflect the wording used in the NPPF.</p>			
<ul style="list-style-type: none"> • Para 2 (b) both “and”s should be “or”s. This is the same wording as in the current policy, which has caused major problems for the Planning Committee in the past. The use of “and” in “physical and perceived separation and open undeveloped character between settlements”, rather than “or”, has been interpreted by officers to mean that all three characteristics (physical separation, perceived separation and open undeveloped character) must be violated before the paragraph can have any effect. The corollary is that, if a development violates only one or two of these characteristics then this paragraph deems the development to be acceptable under its terms. This means that a development could not be rejected under the terms of this paragraph if there would remain any physical space between the settlements, even though it was held to undermine the perceived separation and the open undeveloped character between the settlements. 	<p>Noted. Changes to are proposed to the policy wording for clarification.</p>	<p>(2)(b) second ‘or’ to be changed to ‘and’. Change the ‘and’ between physical and perceived to ‘or’. Delete ‘and open undeveloped character’.</p>	<p>92</p>	<p>Ashby de la Zouch Town Council</p>

<p>The policy should NOT be changed (Ec1 and 2) with regards to development in the countryside.</p>	<p>The Policy (revised criteria (i)) allows for employment uses to be located in the countryside provided the proposal accords with Policy Ec4.</p> <p>Para. 88 of the NPPF supports the sustainable growth and expansion of all types of business in rural areas, both through conversion of existing buildings and well-designed new buildings.</p> <p>Paragraph 89 of the NPPF states that planning policies and decisions should recognise that sites to meet local business needs in rural areas may have to be found adjacent or beyond existing settlements.</p>	<p>None.</p>	<p>103</p>	<p>Judith Billington</p>
<p>[There is a need for the criteria 2 in Policy S4 to include wording on the protection given to sports facilities and playing fields in accordance with NPPF paragraph 103. Therefore, Sport England objects to the current wording of this draft policy.]</p>	<p>All the policies of the Local Plan should be read together. Draft Policy IF4 is consistent with NPPF paragraph 103.</p>	<p>None.</p>	<p>143</p>	<p>Sport England</p>
<p>[Gladman's concern with this policy is that section 2 is reliant on sites progressing past section 1. As it is currently written a site which is not within the closed list (a) – (r) would then not be obliged to be assessed against (2) (a)-(d). If for instance the limits to development were found to be out of date in the future the Council would lack a landscape policy for development in the countryside. While the Council have</p>	<p>Noted. A change is proposed to the policy wording for clarification.</p>	<p>Part (2) to be reworded, delete 'development' and 'in accordance with (a) to (r) above' and reword the first sentence to read 'Where a proposed use is considered acceptable in a</p>	<p>147</p>	<p>Gladman Developments Ltd</p>

<p>a subsequent policy which covers 'Residential Development in the Countryside' Gladman do not consider that this fills the void currently in S4 in particular major residential development.]</p>		<p>countryside location it should...'</p>		
<p>[Object to Draft Policy S4 Countryside. The policy should be more flexible recognising that sometimes uses beyond those listed (a) to r) will need be supported to meet the housing need according to the market. Language used should be positive in accordance with NPPF paragraph 16. Often land outside or adjacent to the limits to development may be the most suitable location for new development and sites within the development limits may not be the most appropriate land to deliver the development required (nor the most sustainable option). Paragraph 7 of the NPPF recognises that 'the purpose of the planning system is to contribute to the achievement of sustainable development, including the provision of homes, commercial development, and supporting infrastructure in a sustainable manner'. Paragraph 69 of the NPPF also states that 'planning policies should identify a sufficient supply and mix of sites, taking into account their availability, suitability and likely economic viability'.]</p>	<p>Noted. A change is proposed to the policy wording for clarification.</p>	<p>Part (2) to be reworded, delete 'development' and 'in accordance with (a) to (r) above' and reword the first sentence to read 'Where a proposed use is considered acceptable in a countryside location it should...</p>	<p>150</p>	<p>Savills (David Wilson Homes East Midlands)</p>
<p>[Policy S4 could be amended to provide greater flexibility in relation to the uses listed (a) to (r) that will be supported, subject to the considerations set out in</p>	<p>Neighbourhood Plans are part of the development plan and as such a specific criterion is not necessary.</p>	<p>None.</p>	<p>161</p>	<p>Mather Jamie (The Trustees of Lord Crawshaw</p>

<p>criteria (a) to (d). The range of uses identified from (a) to (r) could be broadened to add local housing sites within the Countryside that are allocated within a relevant Neighbourhood Plan to ensure there is not potential conflict between this Local Plan and Neighbourhood Plan policy. See also our comments in Section 3 and 4 of our response, which seek to deal with the same issue].</p>				1997 Discretionary Settlement (the Whatton Estate))
<p>[The policy should be amended to include 'appropriate residential infill development'. Windfall sites on the periphery of settlements can make small, but important, contributions to housing delivery and the vitality of settlements. We appreciate this would be for principal towns, key service centres, local service centres and sustainable villages]</p>	<p>The strategy of this plan is to direct new development to appropriate locations within the Limits to Development consistent with the settlement hierarchy set out in Policy S2. In addition, Policy S3 allows for new dwellings at Local Housing Need Villages where a range of criteria are met.</p>	None.	176	Stantec UK Ltd (Talavera Estates Limited and Alexander Bruce Estates Limited)
<p>In principle, Wilson Bowden supports the general principles of Policy S4 and supports the provision of criterion 1(h) within this specific policy, which relates to compliance with the proposed provisions of Policy Ec4.</p>	Noted.	None.	186	Pegasus Group (Wilson Bowden Developments Ltd)
<p>[Draft Policy S4 fails to recognise the importance of Breedon Hill. The emerging Breedon on the Hill Neighbourhood Plan identifies Breedon Hill as a primary landmark with views from and of the Hill protected. However, the importance of Breedon Hill in the landscape extends beyond the Neighbourhood Area (and beyond North</p>	<p>Noted. Breedon Hill is an important feature in the landscape. Criteria (2)(a) of the policy requires development to respect the appearance and character of the landscape, including its historic character.</p>	None.	196	Breedon on the Hill Parish Council

West Leicestershire district) and therefore should be protected by the polices of the Local Plan.]				
<p>[Criterion (d) of Part 2 requires that new development is well integrated with existing development. This is considered inappropriate in relation to criterion h) of Part 1, which allows employment land in accordance with the provisions of Draft Policy Ec4. Draft Policy Ec4 relates to the circumstances where employment development on unidentified sites will be allowed. Policy Ec4 will only apply exceptionally and in circumstances where allocated or existing employment sites and previously developed land are not available. It is likely to apply to particular businesses with specific locational requirements. This can be understood alongside the comments provided at paragraph 7.13 of the emerging Plan. Businesses may need a location separate from built up areas for reasons around safety or amenity or some may demand an attractive landscaped setting. Where such businesses rely on the provisions of draft Policy Ec4 to be attracted to invest in the District they might very well be frustrated by the further requirement of Policy S4 that they must be well integrated with existing development. This conflict might be remedied simply through the inclusion of the words “Where appropriate” at the</p>	<p>Noted. A change is proposed to the policy wording for clarification.</p>	<p>Remove ‘New built development’ from 2(d) and reword to read ‘Be well integrated with existing buildings where these are close to the proposed development’.</p>	<p>225 and 229</p>	<p>Planning Prospects Ltd (St Modwen Logistics and P, W, C & R Redfern)</p>

beginning of criterion d) of Part 2 of the draft policy.]				
[Policy is supported as it maintains an approach that was established in the previous Local Plan, that development on land identified as countryside can be supported subject to various specific criteria, 'Development at East Midlands Airport in accordance with Policy Ec8;']	Noted.	None.	230	East Midlands Airport
[As drafted Policies S4 and S5 impose a blanket ban on proposals for housing development where they are promoted outside limits to settlements (eg on the edges of the towns and villages). This is not consistent with the NPPF, which requires a balancing of planning considerations in every case and will not be found sound. Policies S4 and S5 need to allow for a balanced judgement to be made about the acceptability of such proposals, having regard to all relevant factors including, the need for the Council to maintain an adequate supply of deliverable housing sites throughout the Plan period.]	<p>There is a presumption against development in the countryside. However, there are a number of policies in the Local Plan that allow for development in the countryside.</p> <p>Policy S4 supports housing in a countryside location providing it accords with the requirements of the policy.</p> <p>Policy S3 (Local Housing Needs Villages) allows for new dwellings at Local Housing Need Villages where a range of criteria are met.</p> <p>Policy S5 (Residential Development in the Countryside) allows for rural workers dwellings and replacement dwellings.</p> <p>Policy H6 (Rural Exceptions Policy) supports the provision of affordable housing outside of the Limits to Development as an exception where a number of criteria can be met.</p>	None.	243	Avison Young (Jelson Homes)

	<p>In regard to maintaining an adequate supply of deliverable housing sites throughout the plan period national guidance requires the council</p> <p>If the Council was unable to demonstrate a five-year housing land supply (including any appropriate buffer) the presumption in favour of sustainable development would apply, as set out in Para 79 of the NPPF.</p>			
Suggest the policy should include an additional bullet point (2)(e) along the lines of: “does not prejudice the delivery of wider planned development and/or infrastructure including (but not necessarily limited to) those types referred to under points (1(q)) and (1(r)) above”.	Part (1) (r) of the policy allows for transport infrastructure and part (s) allows for development by statutory undertakers or public utility providers. As such it is not necessary to repeat this under part (2) of the policy.	None.	341	Leicestershire County Council
Minerals and waste safeguarding are important considerations on this issue.	Noted. The Leicestershire Minerals and Waste Local Plan forms part of the Development plan.	None.	341	Leicestershire County Council
<p><i>Comments from an LCC Landowner Perspective:</i></p> <p>The policy in seeking to deliver on the objectives of protecting and enhancing heritage and environmental assets finds a balance with the economic role of the countryside and its ability to support the delivery of other strategic objectives and is therefore seen as appropriate.</p>	Noted	None.	341	Leicestershire County Council
[Re. 4.32/4.33 The environment should be maintained and enhanced. The potential environmental, economic and	The Policy supports agriculture, agricultural uses and agricultural workers dwellings (in accordance with	None.	350	Teresa Walker

<p>social value of the countryside should be realised/maintained. There would be a reduction in land used for food production and the irreversible damage/loss of fertile agricultural land. Why is a greenfield site proposed, rather than land that's already been built on/brownfield sites? As in 4.39, agriculture remains an important part of the local economy, heritage and character of the region. There is a real risk of damage to the local communities/quality of life and mental health. There is a risk that the legacy for future generations is lost too.]</p>	<p>Policy S5) to support the environmental, economic and social value of the countryside.</p> <p>Whilst it is preferable to develop brownfield sites there are only a finite number of these. Development of greenfield sites will be required in order to meet the housing requirements.</p>			
<p>[Proposed policy S4 contains similar policies to adopted LP Policy S3. The new proposed local plan includes policy S5 – Residential Development in the Countryside. Policy S3 makes no reference to when or where developments within the Countryside are or should be acceptable. The reference to policy S3 in policy S4 is, therefore, unacceptable as no criteria have been set out as to when it is appropriate to carry out developments in the Countryside in support of a local need.]</p>	<p>The Local Housing Needs Villages are set out in the Settlement Hierarchy (Policy S2). Local Housing Needs Villages do not have defined Limits to Development and therefore are within countryside. Policy S4 sets out the types of development that will be permitted in the countryside. S(1)(e) provides for Local needs housing in accordance with Policy S3.</p> <p>Policy S3 sets out a range of criteria that housing at a Local Housing Needs Village would need to meet. The reference to Policy S3 in Policy S4 refers the reader to Policy S3 where these criteria are set out.</p>	None.	355	Joanne Lunn
<p>4.33 The 'undeveloped countryside' is a poor term for our vital agricultural land that produces our food. It is developed.</p>	<p>The Government produces information on land use in England and the latest information is available on the</p>	None.	396	Siobhan Dillon

<p>Please can you tell me about the amount of agricultural land in NWLDC. Is the area available monitored and if so how and when?</p>	<p>Government's website: https://www.gov.uk/government/statistics/land-use-in-england-2022 The data for NWL at 2022 is as follows:</p> <ul style="list-style-type: none"> • Total area of NWL is 27,933Ha • Undeveloped/vacant area is 23,991Ha (of which 16,750 is used for agriculture) • Nearly 86% of NWL is undeveloped. 			
<p>[Para 4.33 states land within NWLDC is mostly arable. My perception is that the agricultural land is mostly pastureland and this is increasing. 4.33 States Agricultural land is mainly arable – how is this statement ascertained?]</p>	<p>Noted. A change is proposed to the supporting text.</p>	<p>Amend para. 4.33 to include reference to 'pasture and arable farm land'.</p>	<p>396</p>	<p>Siobhan Dillon</p>
<p>S4 splitting dwellings as permitted within the NPPF para 80 should be included. (if not to be permitted development in the future and short term holiday let's (i.e. Airbnb)</p>	<p>Para 84 of the NPPF (December 2023) States that planning policies and decisions should avoid the development of isolated homes in the countryside unless one or more of the following circumstances apply. Criteria (d) of para 84 allows for development that would involve the subdivision of an existing residential building. A change is proposed to the policy wording.</p>	<p>(1)(g) Add in 'subdivision of existing dwellings'</p>	<p>527</p>	<p>Julia Howard</p>
<p>S4. 1(g)The removal of extensions with reference to S5 should be deleted as this policy S5 refers to replacement dwellings only not extensions.</p>	<p>Noted. A change is proposed to the policy wording for clarification.</p>	<p>Add a new criterion (h) that refers to replacement dwellings in</p>	<p>527</p>	<p>Julia Howard</p>

		accordance with Policy S5.		
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CHAPTER: 4	POLICY NUMBER: S5	POLICY NAME: Residential Development in the Countryside
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MAIN ISSUES RAISED	COUNCIL RESPONSE	ACTION	RESPONDENTS ID	RESPONDENTS NAME
4.51 - Draft Policy S5 (5) - The requirement for a replacement dwelling to be of a similar size and scale and no more visually intrusive than the original dwelling is overly restrictive, unnecessary and will automatically lead to applications being approved against this wording due to permitted development rights that allow for sizeable extensions and also for additional storeys. Any application for a replacement dwelling should be dealt with under normal design considerations (such as the case with the existing local plan).	The Local Plan requirement is different to permitted development rights. The Local Plan requirement will only apply to the initial development. As the council has no control over permitted development rights it is appropriate for the Local Plan to include a policy requirement that limits the scale of the initial development.	None.	8	James Mattley
Support	Noted, support is welcomed.	None.	92	Ashby de la Zouch Town Council
As currently drafted, Policies S4 and S5 impose a blanket ban on proposals for housing development where they are promoted outside limits to settlements (eg on the edges of the towns and villages). Accordingly, they are not consistent with the NPPF, which requires a balancing of planning considerations in every case and will	There is a presumption against development in the countryside. However, there are a number of policies in the Local Plan that allow for development in the countryside. Policy S3 (Local Housing Needs Villages) allows for new dwellings	None.	243	Avison Young (Jelson Homes)

<p>not be found sound. These Policies need to allow for a balanced judgement to be made about the acceptability of such proposals, having regard to all relevant factors including, for example, the need for the Council to maintain an adequate supply of deliverable housing sites throughout the Plan period.</p>	<p>at Local Housing Need Villages where a range of criteria are met.</p> <p>Policy S4 supports housing in a countryside location providing it accords with the requirements of the policy.</p> <p>Policy S5 (Residential Development in the Countryside) allows for rural workers dwellings and replacement dwellings.</p> <p>Policy H6 (Rural Exceptions Policy) supports the provision of affordable housing outside of the Limits to Development as an exception where a number of criteria can be met.</p> <p>The Council is required to maintain an adequate supply of deliverable housing sites throughout the plan period. If the Council was unable to demonstrate a five-year housing land supply (including any appropriate buffer) the presumption in favour of sustainable development would apply as set out in Para 79 of the NPPF.</p>			
<p>Minerals and waste safeguarding are important considerations on this issue.</p>	<p>Noted.</p>	<p>None.</p>	<p>341</p>	<p>Leicestershire County Council</p>

Comments from an LCC Landowner Perspective: Policy S5 incorporates the advice given in the NPPF and is thus compliant with national policy.				
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Plan Objectives

1. Enable the health and wellbeing of the district's population. *[Enabling health and wellbeing]*
2. Ensure the delivery of new homes, including affordable housing, which meet local housing needs including in terms of number, size, tenure and type. *[Ensuring the delivery of new homes]*
3. Achieve high quality development which is sustainable, which responds positively to local character and which creates safe places to live, work and travel. *[Achieving high quality development].*
4. Reduce the need to travel including by private car and increase opportunities for cycling, walking and public transport use, including connecting homes, workplaces and facilities using green infrastructure where possible and through the delivery of dedicated new infrastructure. *[Reducing the need to travel].*
5. Support the district's economy, including its rural economy, by providing for a range of employment opportunities and sufficient new sites which respond to the needs of businesses and local workers. *[Supporting the district's economy].*
6. Enhance the vitality and viability of the district's town and local centres which have an important role serving our local communities with a particular focus on the regeneration of Coalville. *[Enhancing our town and local centres]*
7. Ensure new development mitigates for and adapts to climate change, including reducing vulnerability to flooding, and contributes to reduced net greenhouse gas emissions to support the district becoming carbon neutral by 2050. *[Mitigating for and adapting to climate change].*
8. Conserve or enhance the district's historic character including its built, cultural, industrial and rural heritage and heritage assets and their setting. *[Conserving and enhancing our heritage].*
9. Conserve and enhance the district's natural environment, including its biodiversity and habitat connectivity, geodiversity, green infrastructure, water environments and landscape character, notably the River Mease Special Area of Conservation, the National Forest and Charnwood Forest as well as its other valued landscapes and achieve Biodiversity Net Gain. . *[Conserving and enhancing our natural environment].*
10. Ensure the efficient use of natural resources, in particular brownfield land, control pollution and facilitate the sustainable use and management of minerals and the minimisation of waste. *[Ensuring the efficient use of natural resources].*
11. Maintain and where possible enhance access to services and facilities including jobs, shops, education, sport and recreation, green space, cultural facilities, communication networks and health & social care and ensure that development is supported by the physical and social infrastructure the community needs and

that this is brought forward in a co-ordinated and timely way. *[Ensuring sufficient infrastructure]*

Draft Policy S1- Future Development Needs (Strategic Policy)

- (1) The housing requirement for North West Leicestershire is 686 dwellings each year, and 13,720 dwellings over the plan period of 2020-2040 as set out in the Statement of Common Ground for Leicester and Leicestershire Housing Market Area (June 2022).
- (2) The requirement for general needs employment land for the period 2024 to 2040 is at least 35,000sqm for office uses (defined as the former B1 (now part of Class E)) and at least 146,000sqm for industrial and small warehousing (defined as Class B2 and Class B8) of less than 9,000 sqm.
- (3) The requirement for land for strategic B8 (warehousing) of more than 9,000 sqm will have regard to the outcome from the Leicester & Leicestershire Apportionment of Strategic Distribution Floorspace study.
- (4) For the avoidance of doubt, the annualised district housing requirement for five year land supply and Housing Delivery Test purposes is 686 dwellings each year.
- (5) In meeting the future development needs of the district, new development will be required to contribute towards meeting the Local Plan's objectives with particular emphasis upon the following:
 - (a) Being of a high-quality design, reflecting the Council's Design Code whilst also respecting the natural and built environment;
 - (b) Addressing climate change and reduce carbon emissions;
 - (c) Delivering new infrastructure to support both existing and future residents and businesses; and
 - (d) Contributing towards creating healthy places.

Draft Policy S2 – The Development Strategy (Strategic Policy)

- (1) The strategy of this plan is to direct new development to appropriate locations within the Limits to Development consistent with the settlement hierarchy below and other policies of this plan, subject to development

being proportionate to the scale and character of the settlement concerned.

- (2) As an exception to the hierarchy, which is based on established settlements, Policy H3 identifies land south of East Midlands Airport (Isley Woodhouse) for a new settlement where a large amount of growth will take place during the plan period and beyond.

Hierarchy Classification	Settlements
<p>Principal Town</p> <p>The primary settlement in the district which provides an extensive range of services and facilities including employment, leisure and shopping and which is accessible by sustainable transport from surrounding areas and to other large settlements outside the district. The largest amount of new development will be directed here, including retail development, to support the regeneration of Coalville Town Centre.</p>	<p>Coalville Urban Area comprising Coalville, Donington le Heath, Greenhill, Hugglescote, Snibston, Thringstone, Whitwick and Bardon employment area</p>
<p>Key Service Centre</p> <p>Smaller than the Principal Town in terms of population and also the range of services and facilities they provide, they play an important role providing services and facilities to the surrounding area and are accessible by some sustainable transport. A significant amount of development will take place in these settlements but less than that in the Principal Town</p>	<p>Ashby de la Zouch</p> <p>Castle Donington</p>
<p>Local Service Centre</p> <p>Settlements which provide some services and facilities primarily of a local nature meeting day-to-day needs and where a reasonable amount of new development will take place.</p>	<p>Ibstock</p> <p>Kegworth</p> <p>Measham</p>
<p>Sustainable Villages</p>	<p>Albert Village, Appleby Magna, Belton, Blackfordby, Breedon on the Hill, Diseworth, Donisthorpe,</p>

Settlements which have a limited range of services and facilities where a limited amount of growth will take place.	Ellistown, Heather, Long Whatton, Moira (including Norris Hill), Oakthorpe, Packington, Ravenstone, Swannington, Woodville, Worthington
Local Housing Needs Villages Settlements with very limited services and where development will be restricted to that which meets a local need in accordance with policy S3	Batram, Boundary, Coleorton, Griffydam, Hemington, Lockington, Lount, Newbold, Newton Burgoland, Normanton le Heath, Osgathorpe, Peggs Green, Sinope, Snarestone, Swepstone, Wilson
Small villages or hamlets in the countryside Small groups of dwellings with no services and facilities and where development will be considered in the context of the countryside policy (Policy S4).	Settlements not named in the above tiers

- (3) If during the plan period any of the Sustainable Villages were to lose facilities and services to the extent that they would no longer meet the requirements for a Sustainable Village, this will be a material consideration in the determination of planning applications in these settlements.
- (4) If during the plan period any of the Local Needs Villages gains facilities and services to the extent that they would meet the requirements for a Sustainable Village, this will be a material consideration in the determination of planning applications in these settlements"

Draft Policy S3 – Local Housing Need Villages (Strategic Policy)

- (1) Other than dwellings that accord with Policy S5 (Residential Development in the Countryside) or Policy H6 (Rural Exceptions Sites), proposals for new dwellings at the Local Housing Need Villages will only be supported when each dwelling is:
- (a) Physically well-related to the Local Housing Needs Village; and
 - (b) Intended for occupation by at least one person with a demonstrable local connection to the Local Housing Needs Village.
- (2) To demonstrate a local connection, at least one of the intended occupants must satisfy at least one of the following criteria:

- (a) They are an existing resident in the Parish in which the application site is located and have been so for a continuous period of at least 10 years prior to an application being submitted;
 - (b) They are no longer a resident in the Parish in which the application site is located but were previously residents for a continuous period of at least 10 years;
 - (c) They require frequent attention and/or care due to age, ill health, disability and/or infirmity as demonstrated by written evidence from a medical doctor or relevant statutory support agency and therefore has an essential need to live close to a close family member who currently resides in the Parish in which the application site is located and has done so for a continuous period of at least 10 years; or
 - (d) Their existing accommodation is in the Parish in which the application site is located but is no longer suitable for their needs due to ill health or disability, as demonstrated by written evidence from a medical doctor or relevant statutory support agency.
- (3) As part of any planning permission granted under this policy, the applicant(s) will be obliged to enter a Section 106 legal agreement that requires:
- (a) The applicant(s) to occupy the approved dwelling for a period of at least three years from the date of completion; and
 - (b) The local connection criteria at part (2) of this policy to be applied to any subsequent sale of the dwelling for at least the first three months it is on the market.

Draft Policy S4 – Countryside (Strategic Policy)

(1) Land outside the Limits to Development, as shown on the Policies Map, is identified as countryside where the uses listed (a) to (s) below will be supported, subject to the considerations set out in criteria 2 (a) to (d).

- (a) Agriculture, forestry and equestrian use where it can be demonstrated that any new building is reasonably necessary for the efficient long-term operation of the business;
- (b) Rural workers dwellings in accordance with Policy S5.
- (c) The conversion of redundant or disused buildings;
- (d) Flood protection;
- (e) Local needs housing in accordance with Policy S3;
- (f) Affordable housing exceptions sites in accordance with Policy H6;
- (g) The extension and subdivision of existing dwellings,
- (h) Replacement dwellings in accordance with Policy S5;

- (i) New employment land in accordance with the provisions of Policy Ec4;
- (j) Expansion of existing business and enterprise including agricultural diversification, both through conversion of existing buildings and well-designed new buildings;
- (k) Sites for Gypsies and Travellers and Travelling Showpeople in accordance with Policy H9;
- (l) Community services and facilities meeting a proven local need in accordance with Policy IF2;
- (m) Tourism attractions and facilities and visitor accommodation in accordance with Policy Ec12;
- (n) Sports and recreation facilities;
- (o) Renewable energy; in accordance with Policy AP3;
- (p) Development at East Midlands Airport in accordance with Policy Ec8;
- (q) Development at Donington Park Circuit in accordance with Policy Ec11;
- (r) Transport infrastructure;
- (s) Development by statutory undertakers or public utility providers.

(2) Where a proposed use is considered acceptable in a countryside location it should: :

- (a) Respect the appearance and character of the landscape, including its historic character; and
- (b) Not undermine, either individually or cumulatively with existing and proposed development, the physical or perceived separation between nearby settlements; and
- (c) Not create or extend ribbon development; and
- (d) Be well integrated with existing buildings where these are close to the proposed development.

Draft Policy S5 –Residential Development in the Countryside

Rural workers dwellings

- (1) Proposals for rural workers dwellings will only be permitted providing it has been demonstrated:

- (a) The rural enterprise has been established for at least three years,
- (b) The rural enterprise is economically viable and has clear prospects of remaining so; and
- (c) That there is an essential operational need to live permanently at or near their place of work in the countryside; and
- (d) The need cannot be met within a nearby settlement, or by existing housing at or near the site or through the conversion of a suitable redundant or disused rural building at the site; and
- (e) The size and nature of the dwelling is reflective of the location and setting and proportionate to the needs of the intended occupants.

Temporary rural workers dwellings

- (2) Where Part (1)(b) to (e) are met but the rural enterprise has been established for less than three years, the Council will only permit temporary rural workers accommodation, such as a caravan or mobile home.
- (3) Proposals for temporary rural workers dwellings will only be permitted where a condition or planning obligation is used to require that the temporary accommodation is removed three years from the date of the planning permission.

Loss of rural workers dwellings

- (4) Permission for rural workers dwellings will be subject to an occupancy condition. Proposals to remove an agricultural or other workers' occupancy condition will be permitted where it has been demonstrated:
 - (a) A dwelling is no longer needed for the enterprise; and
 - (b) The property has been actively marketed for at least 12 months at a price which reflects the existence of the occupancy condition.

Replacement residential dwellings

- (5) The replacement of residential dwellings in the countryside will only be permitted providing:
 - (a) The original dwelling is a permanent structure, not a temporary or mobile structure; and
 - (b) The replacement dwelling is of a similar size and scale and no more visually intrusive than the original dwelling; and
 - (c) The number of new dwellings is no more than the number of dwellings to be demolished and replaced; and
 - (d) The replacement dwelling is positioned on the footprint of the existing dwelling, unless a more appropriate location within the existing dwelling's curtilage is identified.

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Title of Report	BREEDON ON THE HILL NEIGHBOURHOOD PLAN SUBMISSION (REGULATION 16) CONSULTATION	
Presented by	Ian Nelson Planning Policy and Land Charges Team Manager ian.nelson@nwleicestershire.gov.uk	
Background Papers	National Planning Policy Framework (NPPF, 2023)	Public Report: Yes
	Planning Practice Guidance (PPG) Breedon on the Hill Neighbourhood Plan Submission Version (2024)	Key Decision: No
Financial Implications	The Breedon on the Hill Neighbourhood Plan will incur direct costs to the Council to support an independent examination of the plan and then a local referendum, should the examination be successful. Grant funding from central government (£30,000 per neighbourhood plan) is payable to the Council to support this agenda but is unlikely to meet the costs in full. 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 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.	
	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	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. Links with the Council's Priorities are set out at the end of the report.	
	Signed off by the Head of Paid Service: Yes	
Purpose of Report	To determine the Council's response to the submission draft of the Breedon on the Hill Neighbourhood Plan.	
Recommendations	<ol style="list-style-type: none"> 1. THAT THE LOCAL PLAN COMMITTEE AGREES THE PROPOSED RESPONSE TO THE SUBMISSION DRAFT OF THE BREEDON ON THE HILL NEIGHBOURHOOD PLAN IN APPENDIX A. 2. THAT THE COMMITTEE NOTES THE CONSULTATION PERIOD FOR THE BREEDON ON THE HILL NEIGHBOURHOOD PLAN. 	

	<p>3. THAT THE COMMITTEE NOTES THAT FOLLOWING RECEIPT OF THE INDEPENDENT EXAMINER’S REPORT, THE STRATEGIC DIRECTOR OF PLACE IN CONSULTATION WITH THE PORTFOLIO HOLDER FOR INFRASTRUCTURE WILL DETERMINE WHETHER THE CONDITIONS HAVE BEEN MET FOR THE NEIGHBOURHOOD PLAN TO PROCEED TO REFERENDUM.</p> <p>4. THAT THE COMMITTEE NOTES 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 INFRASTRUCTURE WILL DETERMINE WHETHER THE NEIGHBOURHOOD PLAN SHOULD BE ‘MADE’.</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 have regard to national and local planning policy. A Neighbourhood Plan can be detailed or general, depending on what local people want. The Plan’s policies must meet a set of [‘basic conditions’](#) which include:
- having regard to national planning policies and guidance;
 - contributing to the achievement of sustainable development;
 - being in general conformity with the strategic policies of the development plan; and
 - being in line with EU obligations and human rights requirements.
- 1.3 As the Local Planning Authority (LPA), the Council has an important role to play in the neighbourhood plan process even though it 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 (six week consultation)
Reg 17	Submit the draft plan for independent examination
Reg 18	Publish the Examiner’s Report and decide if the plan can proceed 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 The Breedon on the Hill Neighbourhood Plan has reached the Regulation 16 stage. This report sets out a proposed consultation response for members to consider (see **Appendix A**).

2. BREEDON ON THE HILL NEIGHBOURHOOD PLAN

2.1 The Breedon on the Hill Neighbourhood Plan Area covers the whole of the parish and was designated on 14 October 2020 (Regulation 6A). Breedon on the Hill Parish Council consulted on a pre-submission version of the plan between 30 October and 11 December 2023 (Regulation 14). As there was no available Local Plan Committee, due to the timescale of the consultation period, the Council's consultation response was agreed in consultation with the Portfolio Holder for Planning before being submitted to the Parish Council.

2.2 The Parish Council considered all the comments it received, amended the plan and it has now requested that the Council organise formal consultation on the submission draft version to the plan and then submit it for Examination (Regulations 15, 16 and 17). This consultation has been arranged for a six-week period from **Tuesday 16 July to Tuesday 27 August 2024**. The submission version of the plan and the supporting documentation can be viewed on the Council's [website](#).

2.3 In overview, the neighbourhood plan policies cover the following broad areas:

- the protection of the countryside, the landscape and locally important views
- the identification of Areas of Separation
- policies to protect the heritage and ecology of the parish, including the designation of Local Green Spaces
- the management of water and flood risk
- the protection of, and support for, community facilities
- the provision of new or improved infrastructure, including financial contributions where appropriate
- the design of new development
- the location of new development including the allocation of around 13 homes at Land north of Southworth Road, Breedon on the Hill (within the existing Limits to Development) and the allocation of around ten homes at Moor Lane, Tonge
- designation of a new Limits to Development at Breedon on the Hill and a Settlement Boundary for Wilson
- housing mix, affordable housing and windfall development
- policies to support the development of rural housing, the residential conversion of rural buildings, rural worker accommodation and replacement dwellings in the countryside
- policies to support the business conversion of rural building and development to facilitate working from home

2.4 As a point of clarification:

- the pre-submission version of the Neighbourhood Plan proposed the allocation of around 15 dwellings at Land South of Priory Close, Breedon on the Hill. This allocation has been removed.
- the proposed new Limits to Development for Breedon on the Hill are intended to replace those within the currently adopted Local Plan. The proposed boundary takes account of new development that has been permitted in the village since the adoption of the Local Plan as well as some minor changes to reflect existing curtilages. These changes will also be picked up by the ongoing work on the new Local Plan and the proposed changes to Limits to Development.

2.5 Officers have reviewed the submission version of the 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 should 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 conflict with one of basic conditions 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 they choose to take account of these points.

2.6 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 plan.

Next Steps

2.7 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 Breedon on the Hill Parish Council.

2.8 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.

2.9 Following receipt of the independent Examiner's Report, the Council must formally decide whether to send the plan to referendum (with or without modifications proposed by the examiner or NWLDC). Regulation 17A(5) of the 2016 Regulations gives the Council five weeks from receipt of the Examiner's Report to decide whether or not to proceed with the referendum. Given the short timescale, the Strategic Director of Place, in consultation with the Portfolio Holder for Infrastructure 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.

2.10 Should the plan be sent to referendum, and residents vote in favour of the Neighbourhood Plan, then the District Council is required to 'make' (i.e. adopt) the plan within eight 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 Infrastructure under the Scheme of Delegation.

Policies and other considerations, as appropriate	
Council Priorities:	The preparation of neighbourhood plans can impact on any and all of the Council priorities: <ul style="list-style-type: none"> • 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 Breedon on the Hill 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 Breedon on the Hill Neighbourhood Plan specifically contains policies that seek to 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 two stages of public consultation.
Risks:	The proposed response at Appendix A concludes 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 them 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> <p>Alison Gibson Senior Planning Policy Officer 01530 454653 alison.gibson@nwleicestershire.gov.uk</p>

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APPENDIX A: OFFICER RESPONSE TO BREEDON ON THE HILL NEIGHBOURHOOD PLAN (BotHNP) SUBMISSION VERSION

Reg 14 Plan: Section/Policy Number/Page Number	Reg 14 Plan: NWLDC Responses	Reg 15 Plan: Section/Policy Number/Page Number and Commentary	Reg 15 Plan: Objections / Comments
Para 1.1	Query why the word 'given' is underlined. Is this supposed to be a link?	Para 1.1 The formatting has been corrected and the underline removed.	None.
Para 1.8	The NPPF has since been revised in September 2023.	Para 1.8 This section has been updated to refer to the NPPF updates in September 2023 and December 2023.	None.
Page 4	Suggest that the Principal Town (on the diagram) be amended from 'Coalville' to 'Coalville Urban Area.'	Page 4 Diagram has been amended in accordance with these comments.	None.
Para 1.16	The Local Plan Review is seeking to identify land for a minimum of 5693 dwellings. Therefore, suggest replacing 'provide for' with 'identify land for' in the following sentence: <i>Having regard to the Leicester and Leicestershire Strategic Growth Plan, the Local Plan Review is looking to <u>identify land for an additional minimum of 5,693 houses</u></i>	Para 1.16 Amendments have been made in accordance with these comments.	None.
Para 2.5 (page 10)	<u>Comments from the Conservation Officer</u> The height of a physical feature is usually presented as a height above ordnance datum (AOD), not above sea level. The summit of Breedon Hill is more than 125m AOD. This height is meaningless if it is presented out of context. It would be more meaningful if it was presented in the context of the settlement core, which occupies a shallow basin between 70m and 75m AOD.	Para 2.5 (Page 9) No changes have been made.	Comment The comments raised are noted and have not been resolved. However, the wording used in the Neighbourhood Plan would not result in the Plan not meeting the set of basic conditions.

Para 2.5 (page 10)	<u>Comments from the Conservation Officer</u> Breedon Hill is an outcrop of the Cloud Hill and Milldale dolostone formations (the latter formation is quarried for aggregate). Dolostone is the preferred geological term, although the SSSI notification continues to refer to carboniferous limestone grassland. Magnesian limestone is a non-preferred geological term (there is no such thing as 'magnesium limestone').	Para 2.5 (Page 9) No changes have been made.	Comment The comments raised are noted and have not been resolved. However, the wording used in the Neighbourhood Plan wouldn't result in the Plan not meeting the set of basic conditions.
Para 2.15	Suggest that the bus service is defined as infrequent/only twice daily.	Para 2.15 Makes reference to an infrequent bus service.	None.
Policy BotH1: Countryside (Page 17)	Last line of the policy. Replace Policies S3 with Policy S3	Policy BotH1: Countryside (Page 16) Policy refers to Policy S3.	None.
Policy BotH1: Countryside (Page 17)	This policy provides a Limits to Development for Breedon on the Hill and a Settlement Boundary for Wilson. These issues are addressed below under Policies BothH15 and BotH17. It may help the user of the document if the LTD plans followed this policy rather than being in the housing chapter, particularly as they relate to more than just housing?	Policy BotH1: Countryside (Page 16) No changes have been made and the Limits to Development and Settlement Boundary Plans are shown in the Housing Chapter and on the Policies Map at the end of the document.	Comment These comments were only advisory in nature and the layout of the Neighbourhood Plan would not result in it not meeting the set of basic conditions.
Policy BotH2: Protecting the Landscape and Locally Important Views	Some of the views listed in this policy and shown on maps 2- 4 appear to be generally over tracts of open countryside. In this respect the Council considers that the policy acts more as a countryside policy which is a function performed by Local Plan Policy S3 – Countryside and is a strategic matter which is inappropriate for a neighbourhood plan. Further, the policy would be difficult to apply effectively in development management decisions without a clear understanding of what it is special about these views that	Policy BotH2: No changes have been made.	Objection The Council objects to this policy for the reasons given at the pre-submission (Regulation 14) stage. Views 1 and 2 appear to be generally over tracts of open countryside. In this respect the council considers that the policy acts more as a

	<p>the Neighbourhood Plan is aiming to safeguard. Suggest that justification is provided detailing why these views are highly characteristic of the area and what it is that they display.</p> <p><u>Comments from the Conservation Officer</u></p> <p>Policy BOTH2 identifies five “locally important views”. The Breedon conservation area appraisal identifies key views including a view “northwards along Worthington Lane” (4.23). The Tonge appraisal identifies “fine views [from] the western entrance to the hamlet to the parish church on Breedon Hill” (4.23). This evidence does not appear to have contributed to your own understanding of “locally important views” in the plan area.</p>		<p>countryside policy which is a function performed by Local Plan Policy S3 – Countryside and is a strategic matter which is inappropriate for a neighbourhood plan.</p> <p>However, there is no objection to the principle of the Views 3,4, & 5, as they are views within settlement and not over tracts of open countryside.</p> <p>However greater clarity is needed to aid the decision maker in understanding why these views are important and how proposals could potentially impact upon them and provide appropriate mitigation.</p> <p>Reason This is a strategic matter whereas, as directed by the NPPF, Neighbourhood Plans should focus on non-strategic policies.</p> <p>To give confidence when determining planning applications (NPPG (Neighbourhood Planning) Paragraph: 041 Reference ID: 41-041-20140306).</p>
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<p>Policy BotH3: Areas of Separation</p>	<p>Retaining the separation between settlements is a strategic matter which is covered in criterion (ii) of Local Plan Policy S3 – Countryside “it does not undermine....the physical and perceived separation and undeveloped character between nearby settlements...”.</p> <p>There is some precedent, however. The Examiner for the Blackfordby Neighbourhood Plan considered an Area of Separation Policy. (see page 14 of the Examiners Report). He concluded that “notwithstanding the fact that countryside policies would apply, the policy serves to reinforce the function of this local space. The Examiner changed the title of this designation to ‘Local Area of Separation’ in order to distinguish it from the Local Plan.</p> <p>However, it is unclear how a Provisional Area of Separation can be identified and designated in the absence of the allocation of a new settlement. It is suggested that the issues this policy is seeking to address are better dealt with in the Local Plan should land be allocated for a new settlement.</p> <p>Alternatively, it needs to be clear at what stage in the Local Plan process, for example Regulation 19, when the designation may change from a Provisional Area of Separation to an actual Area of Separation.</p>	<p>Policy BotH3: Areas of Separation No change has been made to these physical designations.</p> <p>Although, the following additional wording has been added to the policy to provide the trigger when this policy requirement would apply to the Provisional Area of Separation.</p> <p><i>The above requirements will also apply to the Provisional Area of Separation to the north of Tonge, as defined on Map 5, should proposals for a new settlement to the north of the Neighbourhood Area be progressed through either a planning application or the Regulation 19 Draft version of the North West Leicestershire Local Plan.</i></p>	<p>Objection The Council objects to this policy for the reasons given at the pre-submission (Regulation 14) stage.</p> <p>Retaining the separation between settlements is a strategic matter which is covered in criterion (ii) of Local Plan Policy S3 – Countryside “it does not undermine....the physical and perceived separation and undeveloped character between nearby settlements...”.</p> <p>It is noted that the Examiner for the Blackfordby Neighbourhood Plan considered an Area of Separation Policy. He concluded that “notwithstanding the fact that countryside policies would apply, the policy serves to reinforce the function of this local space.’</p> <p>If the examiner considers this policy is non-strategic and the designation of the area of separation is acceptable, we request that the policy should refer to a Local Area of Separation.</p>
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			<p>However, it remains unclear how a Provisional Area of Separation can be identified and designated in the absence of a new settlement. The Neighbourhood Plan cannot provide certainty on this matter and is dependent on the outcome of the new Local Plan. The strategic matter would be better dealt with in the Local Plan should land be allocated for a new settlement.</p> <p>Reason This is a strategic matter whereas, as directed by the NPPF, Neighbourhood Plans should focus on non-strategic policies.</p>
<p>Policy BotH4: Countryside Access</p>	<p><u>Comments from the Health and Well Being Team</u></p> <p>There are no significant sporting/leisure facilities, and it is unlikely a development would be large enough to warrant a contribution or need to develop a new facility.</p> <p>Support reference to walking and cycling in Policy BotH4 and the creation of new links. Is there an opportunity to seek improvements to the walking network through new developments? Suggested improvements could be in the form of footpath widening, additional crossings.</p> <p>Would support greater detail around design and developments are designed to encourage active modes of transport such as cycling and walking. Developments should be designed so that wheelchairs and mobility</p>	<p>Policy BotH4: Countryside Access</p> <p>No changes have been made and these comments were only advisory in nature.</p>	<p>Comment</p> <p>It is noted that this is an enabling policy and accessibility improvements are sought where opportunities arise. These comments were only advisory in nature.</p> <p>Paragraph 8.28 mentions the Cloud Trail and the Parish Council's support for the extension of the Trail. Therefore it may be useful for the Neighbourhood Plan to acknowledge the North West</p>

	<p>scooter can be used to access the existing network and local facilities.</p> <p>Does the Neighbourhood Plan provide an opportunity to protect cycling routes?</p>		<p>Leicestershire Cycling and Walking Strategy and the North West Leicestershire Local Cycling and Walking Infrastructure Plan which provides the evidence base and prioritisation of the Cloud Trail. In addition, there is the Ashby de la Zouch Town Council Cycling and Walking Strategy 2022.</p>
<p>Policy BotH5: Ecology and Biodiversity</p>	<p>Having checked the Council's records of Local Wildlife Site (LWS)_ against Map 8 of the Neighbourhood Plan the following is advised:</p> <ul style="list-style-type: none"> • It is difficult to see the extent of the site 75570 on Map 8 • There is 75198 south west of Breedon and the green dot covers another number. • Is 91421 south west of Breedon centre all three dots? • Our records show Site Ref 75101 and this is detailed in Appendix 1 but does not seem to appear on Map 8 • Map 8 details 75092 and 75023 as a run of hedgerow. Council records show this hedgerow to comprise of 75023, 74931, 74967, 75029, 74974 and 75092. Furthermore 75023 is only identified as a potential LWS. <p>For accuracy, the Council recommends that the NP Group checks these discrepancies with the LCC Ecology team.</p>	<p>Policy BotH5: Ecology and Biodiversity: Map 5 has been amended where possible following a recheck of the discrepancies identified. 75023 is confirmed as a LWS. LWS 91421 and 75101 have been amended.</p> <p>However, as some of the LWS are very small and it is impractical to show all of them at a large scale.</p>	<p>Comment</p> <p>The availability of maps showing more detail would be of benefit to the user.</p> <p>The Neighbourhood Plan identifies Historic Local Wildlife Sites as 'having important wildlife value in the past but have not been surveyed since the 1980s/90.' It would be useful to clarify their current wildlife value.</p>


	It would be useful to clarify if historic Local Wildlife Sites are still designated sites. If they are no longer designated would suggest that they are not included.		
Policy BotH6: Trees and Hedgerows	No Comments	Not applicable.	None.
Policy BotH7: Water Management	Should the opening sentence refer to 'designed' rather than 'built'?	Policy BotH7: Water Management The opening sentence has been amended to refer to 'designed'	None.
Policy BotH8: Retention of Community Services and Facilities	No comments to make.	Policy BotH8: Retention of Community Services and Facilities Breedon Parish Hall has been added to this policy. This facility will be protected and development which assists its diversification and improvement will be supported.	None.
Policy BotH9: Ultrafast Connectivity	Should the policy also refer to technically unviable?	Policy BotH9: Ultrafast Connectivity No changes made as the second part of the policy refers to unviable development.	Comment Suggest that the policy recognises those instances when the provision of open access ducting to industry standards would be technically unfeasible.
Policy BotH10: Infrastructure	No comments to make.	Not applicable.	None.
Paragraphs 6.1 to 6.12 (pgs 46 -29)	<u>Comments from Conservation Officer</u> Paragraphs 6.1 to 6.12 reproduce paragraphs from the Breedon, Tonge and Wilson conservation area appraisals. The District Council should be credited as the source of this information.	Chapter 6 – Heading of Historic Development A footnote has been added crediting the Breedon, Tonge & Wilson Conservation Area Appraisals.	None

<p>Paragraphs 6.4 to 6.5</p>	<p><u>Comments from Conservation Officer</u></p> <p>Paragraph 6.4 refers to the quarry while paragraph 6.5 refers to “important landowners”. References to developments “by the turn of the nineteenth century” and “in the middle of the nineteenth century” are misleading. Paragraph 6.5 does not refer to Lord Donington or John Gillies Shields, who were instrumental in the development of the modern quarry. The following is my own account, although it relies heavily upon the account in <i>Hand-me-down hearsays</i> (2002).</p> <p><i>In 1641 the manor belonged to the first Earl of Stamford. In 1770 Nathaniel Curzon and the fifth Earl exchanged letters about the “lime works at Breedon”. In 1872 Nathaniel Curzon acquired Lockington Hall “and left Breedon Hall”. In 1873 the seventh Earl “put his Breedon property up for sale by auction”. It was bought by Charles Abney Hastings (d.1895), first Baron Donington.</i></p> <p><i>The Earl of Stamford had “let the lime works from year to year to the Bostock family”. Lord Donington let the quarries to Fielding Moore, who worked the quarries for three years “and then went bankrupt”. Lord Donington “decided to run the quarries himself”; he engaged John Stableford of Coalville, who managed the quarries in the 1880s “with ever decreasing success”.</i></p> <p><i>Lord Donington asked his agent, John Gillies Shields, to “take control of the quarries”. In 1896 the quarries were leased to Mr Shields for thirty years. In 1920 Mr Shields “was able to purchase the quarries and other land in the parish outright”. In the 1920s Breedon Hall “was let to Major Johnny Shields, who remained there until 1943 when his father [John Gillies] Shields died”. In 1944 “Captain Charles Shields (Johnny’s younger brother) bought Breedon Hall from John Curzon and moved in”.</i></p>	<p>Paragraphs 6.4 to 6.5 No changes have been made.</p>	<p>Comment The comments raised are noted and have not been resolved. However, the wording used in the Neighbourhood Plan would not result in the Plan not meeting the set of basic conditions.</p>
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Paragraph 6.19 (Page 52)	<p><u>Comments from Conservation Officer</u></p> <p>Paragraph 6.19 says that most buildings “built between 1700 and 1840” are listed. In fact since November 2018 the threshold has been 1850, not 1840 (link).</p>	<p>Paragraph 6.19 (Page 51) Text has been amended to reflect the guidance contained within the ‘Principles of selection for listed buildings’ (Department for Digital, Culture, Media and Sport)</p>	None
Page 53	The font for the LB building link for ‘Church of St Mary and St Hardulph, Breedon on the Hill’ is different to that used for the other links.	<p>Page 52 The formatting has been updated for consistency.</p>	None.
Section on Non-Designated Heritage Assets	<p><u>Comments from Conservation Officer</u></p> <p>Paragraph 6.27 refers to a list of ‘features of local heritage interest’, compiled from <i>Hand-me-down hearsays</i> (2002), the Leicestershire & Rutland HER, the Breedon, Tonge and Wilson conservation area appraisals and a 2021 questionnaire survey.</p> <p>Paragraph 6.29 says that the HER “identifies 10 historic buildings which are not already listed and 37 archaeological remains”. Policy BOTH11 contains a list of 10 ‘features of local heritage interest’ and a list of 37 ‘known archaeological remains’ and thus appears to be based solely on the evidence in the HER. I cannot see how the other three sources of evidence have contributed to this exercise.</p> <p>In response to an examiner’s question, in 2021 I said that a neighbourhood plan should “identify clear criteria for the identification of heritage assets”. The draft plan contains no such criteria.</p> <p>MLE19765 refers to a “brick cart shed built at some point between 1887 and 1903”; <i>prima facie</i> I can see no reason why it has been identified as a feature of local heritage interest.</p>	<p>Policy Both11: Locally Valued Heritage Assets MLE4399 and MLE23231 have been deleted as they relate to the scheduled monument.</p> <p>The Parish Council have advised that the brick-built cart-shed, as the District Council sought its retention as part of an approved development in the District.</p> <p>Clarification provided that the historic settlement cores for Breedon on the Hill, Tonge and Wilson are based on archaeological interest and serve a different purpose to Conservation Areas. The boundaries are different too.</p>	<p>Comment Policy Both11 identifies a number of non-designated heritage assets. This list has been compiled from a number of sources, including the HER.</p> <p>However, a neighbourhood plan should identify clear criteria for the identification of heritage assets. The [NP] contains no such criteria for identifying “local heritage assets”. The reasoning/ justification for the identification of specific assets is somewhat limited and lacks transparency.</p>

	<p>The 10 historic buildings “are not already listed”, but some of the 37 “known archaeological remains” are associated with designated heritage assets. MLE4399 and MLE23231 relate to the scheduled monument known as ‘The Bulwarks’.</p> <p>Historic settlement cores MLE4426, MLE9166 and MLE16894 relate to the conservation areas at Tonge, Breedon and Wilson respectively.</p> <p>Some of the “known archaeological remains” have been destroyed; for instance a cemetery (MLE4402) was excavated “in advance of destruction by quarrying”. Some of the “known archaeological remains” (including MLE4398 and MLE16871) are finds.</p>		
Policy BotH12: Design	No comment	None.	None
Policy BotH13: Local Green Spaces	<p>For context, it would be useful to highlight the tests which need to be met for a piece of land to be able to be designated as Local Green Space (paragraph 102 of the NPPF) and this is cross referenced to Appendix 3:</p> <p><i>a) in reasonably close proximity to the community it serves;</i> <i>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</i> <i>c) local in character and is not an extensive tract of land.</i></p> <p>It is suggested that evidence/justification is provided to support the various statements at Appendix 3 and how each sites meets the relevant criteria.</p>	<p>Appendix 3 Modified to include the Local Green Space designation criteria and which criteria each Local Green Space satisfies.</p> <p>Although no comments have been made on specific Local Green Spaces, three sites have been removed from Wilson. Wilson now only includes two Local Green Spaces.</p>	<p>Comment It would be beneficial to provide evidence/justification how each sites meets the identified criteria as this would aid decision making in the event of future planning applications.</p>

HS2 Section (Paragraphs 8.9 to 8.11)	This section would benefit from an update now that the government has announced that it will no longer proceed with the eastern leg of HS2 which would have passed through the district.	Chapter 8: Transport The section on HS2 has been deleted. HS2 has been deleted from the maps throughout the Neighbourhood Plan.	None.
Paragraphs 9.3 and 9.4	The redevelopment of previously developed land for housing should be within or well related to the settlement boundary. This should be reflected in the text for clarity.	Paragraphs 9.3 and 9.4 Amendments have been made accordingly.	None.
Paragraphs 9.8 to 9.10 New Settlement	The reference to the potential for the new Local Plan to include a proposal for a new settlement is noted, as is the response to the questionnaire survey undertaken. It is not clear whether the reference at paragraph 9.8 to 30 years should be 20 years?	Paragraph 1.15 Paragraph 1.15 provides an update on the Draft Local Plan. Reference to 30 years remains in Paragraph 9.8	None
Policy BotH14: Housing Requirements	It is noted that the proposed Limits to Development do not fully accord with the Limits to Development in the adopted NWLLP. The Limits to Development boundary has been updated to account for new development that has been permitted in the village. The Council is also undertaking a review of the Limits to Development. Public consultation on this review will take place in January 2024 and also proposes the inclusion of approved development sites within the Limits to Development boundary. It is appreciated that this is only a consultation document but there is some difference in how the line has been drawn to reflect the Cameron Homes Development off Ashby Road/The Green. The Council is also proposing two further changes, one to reflect the office development that has been permitted at Pinnacle House and the other to follow a residential curtilage at the junction of Hollow Road and Melbourne Road.	Policy BotH14: Housing Requirements Following discussions with the Parish Council amendments have been made to the proposed Limits to Development for Breedon on the Hill. These can be summarised. <ul style="list-style-type: none"> • Deletion of the proposed housing allocation at Land South of Priory Close and the redrawing of the line around the existing Cameron Homes Development off Ashby Road/The Green. • Minor changes to the northern boundary next to Manor Farm. • Redrawing of the boundary around the quarry site to reflect recent development and the exclusion of an area of hardstanding and Listed Building. 	Comment These changes to the Breedon on the Hill Limits to Development are considered satisfactory. These changes will also be picked up by the ongoing work on the new Local Plan and the proposed changes to Limits to Development.

	<p>Please find a link to the Proposed Limit to Development that is to be the subject of public consultation in early 2024.</p> <p>A meeting to discuss this matter further would be helpful.</p>	<p>This policy now refers to the allocation of Land north of Southworth Road, Breedon the Hill for the development of approximately 13 dwellings in accordance with Policy BotH16.</p>	
<p>Policy BotH16: Land south of Priory Close, Breedon the Hill</p>	<p>Given that there is no housing requirement for Breedon on the Hill in the adopted Local Plan, planning policy officers have provided the Parsh Council with an indicative housing figure, having tested various housing growth and distribution scenarios, to provide a final figure of 13 dwellings for the plan period.</p> <p>Officers welcome the Parish Council's proposal to allocate a site for housing as it represents positive planning which is based in evidence. The site is for approximately 15 dwellings which would equate to 15 dwellings per hectare, a density that is not considered unreasonable, provided the design and layout of future development respects the character of the area.</p> <p>It is noted that the Housing Allocation was further informed by a 'Call for Sites' and Site Appraisal process.</p> <p>Would be useful to reference in policy that the boundary hedgerow to the front of the site is designated as Local Green Space.</p> <p><u>Comments from Development Management are as follows: -</u></p> <p><u>Planning History</u></p> <p>No Planning History – other than the site to which it adjoins to the north east</p> <p><u>Site Characteristics</u></p>	<p>Policy BotH16: Land south of Priory Close, Breedon the Hill</p> <p>This allocation has been deleted and been replaced with the allocation of 'Land north of Southworth Rd, Breedon on the Hill' for around 13 dwellings.</p> <p>Provided below is an extract from the Neighbourhood Plan Policies Map identifying the proposed housing allocation in dark purple .</p> 	<p>Comments</p> <p>Officers welcome the Parish Council's proposal to allocate a site for housing as it represents positive planning which is based on evidence. It is noted that the process of allocating a site was informed by a 'Call for Sites' and Site Appraisal process.</p> <p>The site is within the Limits to Development for Breedon on the Hill as currently defined in the Local Plan. There is no objection in principle to the allocation of this site, subject to other planning matters being resolved, including highway access, design, layout, impact on the character of the area and flooding.</p> <p>The allocation of a site within the Neighbourhood Plan agrees the principle of development. A planning application would need to be approved before development can begin.</p>

	<p>Greenfield site Access is assumed off Priory Close (in order to retain the tree belt) A number of trees on site, including a tree belt running perpendicular with Ashby Road and a hedgerow running through the middle of the proposed site Public Footpath running north to south on the underside of the tree belt and then along the southern edge of the site in a north westerly direction Pond to the south of the site (beyond it) High and medium risk of surface water flooding to the east of the site, along Ashby Road and lower risk extended into the site Flood Zone 1 Site levels unknown The frontage is to be designated as a Local Green Space in the Draft NP.</p> <p><u>Assessment</u></p> <p>There are a number of trees on site which would be lost as a result of any re-development which would need to be mitigated against – replacement planting proposed.</p> <p>This site would adjoin existing development and in principle would appear as a natural extension to the south from the existing built development it would adjoin on Priory Close. It would also not encroach any further to the south of the settlement than existing development to the eastern side of Ashby Road.</p> <p>However, the site appears to straddle across two existing parcels of land which are subdivided by an existing hedgerow. It would appear to make more sense to develop the eastern most part of the site, closest to the existing building development to the north east, and retain the existing hedgerow, and have that act as physical and visual separation from the countryside beyond.</p>	<p>This allocation is currently the subject of a full application (24/0007FULM) for 18 affordable homes. The planning application is still under consideration, with a number of matters still to be resolved.</p>	<p>The proposed allocation is the subject of a planning application and it is at this stage when the detail of the development will be considered. The planning application proposes 18 dwellings and it has yet to be determined if the site can accommodate this level of development in a satisfactory manner, having regard to matters such as design and layout, surface water drainage and access.</p>
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	<p>Breedon on the Hill contains a shop, community facilities etc and would be a sustainable location for a development of up to 15 dwellings. As such there could be support in principle for this site, however alternative siting as shown in blue below, is suggested.</p> 		
<p>Policy BotH17: Wilson – Windfall Housing Development</p>	<p>The Local Plan does not define a settlement boundary for the interpretation of Local Plan policy.</p> <p>However, the approach taken in identifying the settlement boundary generally appears reasonable when considered against the adopted Local Plan and the new Local Plan. However, it would be helpful if the methodology used to define the settlement boundary is made available and published.</p> <p>Please note a site visit has not been undertaken to Wilson but you may wish to give consideration to the inclusion in</p>	<p>Policy BotH17: Wilson – Windfall Housing Development</p> <p>The Settlement Boundary for Wilson has been extended to include Thatched Cottage, Slack Lane. (Detailed on Map 18).</p>	<p>Comment</p> <p>Support the changes to criterion E and the addition of Criterion F.</p> <p>It would be beneficial for the methodology to be made available.</p>

	<p>the settlement boundary of the property named Thatched Cottage, Slack Lanes.</p> <p>Queries are raised on Criteria E and what is being sought here. Must the previously developed land not be of high environmental value to satisfy this policy? What is meant by high environmental value? If this is a requirement of the policy this exceeds the requirement of Local Plan and National Policy.</p>	<p>Criterion E has been modified to only refer to the redevelopment of previously developed land.</p> <p>An additional criterion F has been added to refer to <i>'Affordable housing in accordance with Local Plan Policy H5 (Rural Exceptions Sites for Affordable Housing)'</i></p>	
<p>Policy BotH18: Brook Farm, Moor Lane, Tonge</p>	<p>Tonge is identified as a small village and Local Plan Policy S2 states that development in this village will be restricted to conversions of existing buildings or the redevelopment of previously developed land. The farmhouse on site could be considered as previously developed land, but the remainder of the buildings, glasshouses and associated land are greenfield. The allocation of this site would be contrary to Local Plan Policy S2.</p> <p><u>Comments from Conservation Officer</u> It is proposed to allocate land in the Tonge conservation area to "provide approximately ten dwellings". In 2020 it was proposed to develop six dwellings including four new buildings (20/01689/FUL). I said that the "high density and the loss of soft landscaping would not reflect the low density of the conservation area, its 'open paddock areas' or the agricultural landscape that 'penetrates into the hamlet'". Hence an amended proposal was submitted for the development of three dwellings. In this context a development of ten dwellings would be beyond the pale.</p> <p><u>Comments from Development Management</u></p> <p><u>Brook Farm, Moor Lane, Tonge</u></p>	<p>Policy BotH18: Brook Farm, Moor Lane, Tonge No changes have been made to this housing allocation.</p> <p>Objections still remain on the grounds of impact on heritage assets, and the allocation of this site, considered to be largely greenfield.</p> <p>Criteria B of the Policy states that the site will be treated as previously developed land for the purposes of affordable housing. It is assumed that this is purely used to calculate affordable housing provision and not an acceptance that the site is classed as previously developed land.</p>	<p>Objection NWLDC objects to this policy for the reasons given at the pre-submission (Regulation 14) stage.</p> <p>Local Plan Policy S2 states that development in this village will be restricted to conversions of existing buildings or the redevelopment of previously developed land. The farmhouse on site could be considered as previously developed land, but the remainder of the buildings, glasshouses and associated land are greenfield. The allocation of this site would be contrary to Local Plan Policy S2.</p> <p>The redevelopment of the site would also be unacceptable in terms of its impact on the</p>

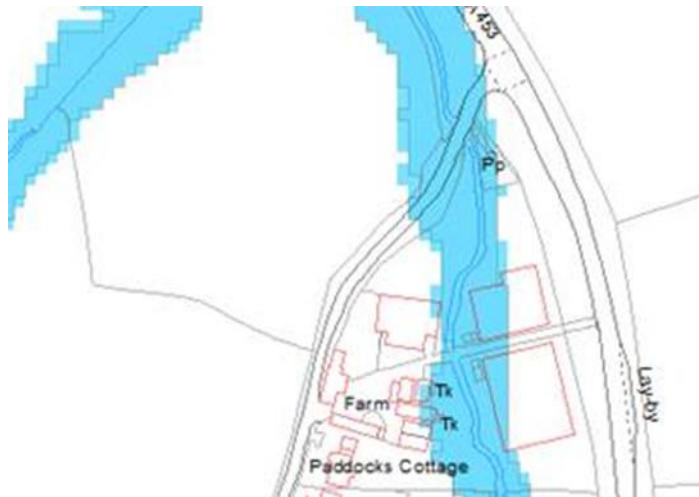
	<p><u>Planning History</u></p> <p>20/01766/FUL - Demolition of existing glasshouses and change of use of former commercial plant nursery for the keeping of horses and the erection of a stable block was approved on 23.12.2021</p> <p>20/01689/FUL – Originally submitted for eight residential dwellings (erection of 5 dwellings and conversion of farmhouse into two dwellings), but amended during the course of the application to Demolition of existing outbuildings and glasshouses and erection of two dwellings and the conversion of the existing farmhouse into two dwellings, which was subsequently withdrawn once the Council confirmed it was not supportive.</p> <p>There was some discussion as part of this application that the demolition of the existing glasshouses that are derelict and dilapidated once cleared would be an enhancement to the Conservation Area. However, the re-development of this, was not acceptable in heritage or policy terms.</p> <p><u>Site Characteristics</u></p> <p>The site was historically a farm complex but was later converted to a horticultural nursery and is now redundant. A single-track access from the A453 located to the immediate east</p> <p>A residential dwelling (Paddocks Cottage) within the same ownership of the applicant is located to the south.</p> <p>A brook runs through the centre of the site with a bridge crossing.</p> <p>Part of the site to the south is located within the Tonge Conservation Area.</p> <p>The majority of the site is located within Flood Zone 2, with some areas in Flood Zone 3 + high risk of surface water flooding to the east of the site.</p> <p>Water vole and historic wildlife site</p>		<p>historic environment, contrary to Policy He1 of the Local Plan.</p> <p>Reason</p> <p>The allocation and redevelopment of the site as proposed would be contrary to Local Plan Policy S3 and Policy He1. The policy is not in general conformity with the strategic policies of the Local Plan. It should be noted that at paragraph 13.5 of the adopted Local Plan (2017) it is confirmed that <i>“The policies in this Local Plan are the strategic policies that Neighbourhood Plans will be required to be in conformity with.”</i></p>
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Site levels unknown.

Assessment

This majority of the site is agricultural so not PDL, it is a very isolated site on the edge of the settlement – and a settlement that we have repeatedly said is not sustainable. The Council won the appeal APP/G2435/W/18/3219446 (app ref: 18/00567/FUL) which is still very much of relevance to this settlement for potential future development on this site. As such the Council would only support the conversion of existing buildings on this site, rather than demolition and re-build of new.

It is also worth noting the Flood Zones and a Sequential Assessment would need to demonstrate how/why a more preferential Flood Zone (Flood Zone 1) could not be achieved, elsewhere.



<p>Policy BotH19: Housing Mix</p>	<p>Policy BotH19 identifies a housing mix that developments of five or more dwellings should broadly reflect, unless informed by a more up to date evidence of housing need. This is justified having regard to the housing profile of the Parish as well as a 2021 Housing Needs Assessment.</p> <p>Local Plan Policy H6 applies to developments of 10 or more dwellings whereas Policy BotH19 applies to development of five or more market dwellings. However, whilst the HEDNA (Housing and Economic Development Needs Assessment) identifies the mix of homes needed the supporting text at NWLLP paragraph 7.47 recognises “there may be a need for local variations”.</p>	<p>Policy BotH19: Housing Mix This policy has been amended as follows, to focus on limiting the provision of larger dwellings:-</p> <p><i>‘Unless informed by more up to date evidence of housing need, on developments of five or more dwellings, no more than 16% of market housing should be dwellings of four or more bedrooms. Within the housing mix, provision should be made for bungalows and other provision designed to meet the housing needs of older households.’</i></p>	<p>Comment This policy is informed by the evidence base study ‘Breedon on the Hill Housing Needs Assessment (May 2021)’, referenced in the Neighbourhood Plan and available on the Parish Council website.</p>
<p>Policy BotH20: Affordable Housing</p>	<p>The provision of affordable housing is a strategic policy matter. The quantum/tenure of affordable housing provision therefore needs to be in accordance with the requirements of NWLLP Policy H4.</p> <p>This policy seeks the provision of affordable housing on developments of 10 or more homes or where the site has an area of 0.5 hectares. This complies with the national site size threshold.</p> <p>The proportion of affordable housing on Greenfield sites is detailed as 30%, which is also detailed in Local Plan Policy H4. The mix of affordable housing type is detailed.</p> <p>With respect to previously developed land, the policy details the percentage of the properties that should be for affordable home ownership (at 10%). This is consistent with national policy.</p> <p>Detailed comments have been received from the Strategy Housing Team have been provided with respect to this policy, and these have been attached for your information.</p> <p>It is proposed that this requirement for a local connection should be deleted from this policy for the following</p>	<p>No changes have been made.</p> <p>The Strategic Housing Team wish to reiterate the points previously made. This policy does not align with the affordable housing eligibility criteria applied by the Council’s Housing Service and is not in general conformity with NWLLP Policy H4 which includes no such local connection requirement. Policy BotH20 would disadvantage those people in housing need who come from places with no/limited new development, as they would never have their needs met. It would also appear that our comments relating to the methodology/findings of the Housing Needs Assessment have not been addressed or responded to.</p> <p>For the avoidance of doubt, these comments relate to the earlier version of the plan. In light of the Strategic Housing Team’s above response to the Submission Version of the Neighbourhood Plan, these earlier comments will be submitted to the Examiner alongside the Council’s response to the Submission</p>	<p>Objection NWLDC objects to this policy for the reasons given at the pre-submission (Regulation 14) stage.</p> <p>The requirement for a local connection should be deleted from this 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 NWLLP Policy H4 which includes no such local connection requirement.</p> <p>On a practical level, a consequence of a local connection requirement is that</p>

	<p>reasons; a) it does not accord with the affordable housing eligibility criteria applied by the district Council's Housing Service. The criteria require a connection to the district, not to the local area; and b) it is not in general conformity with NWLLP Policy H4 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>A similar approach has been advocated in other Neighbourhood Plans in the district and has not been supported by Examiners. Supporting such an approach would be inconsistent.</p>	<p>Version of the Neighbourhood Plan. This will help provide context to this objection.</p>	<p>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>This objection has been supported at other Neighbourhood Plan Examinations, including for the Blackfordby NP and Swannington NP. The examiner for the Ashby NP also concluded that the allocation of affordable housing was not a matter for a Neighbourhood Plan. The examiner considered the local connections element of the policy strayed too far beyond land use planning matters and into housing policy that is a matter for the Council. This element of the policy was recommended for removal.</p> <p>Reason The policy would be contrary to Local Plan Policy H4. The policy is not in general conformity with the strategic policies of the Local Plan and the NPPF. It should be noted that at paragraph 13.5 of the</p>
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			adopted Local Plan (2017) it is confirmed that <i>“The policies in this Local Plan are the strategic policies that Neighbourhood Plans will be required to be in conformity with.”</i>
BotH21: Rural Housing	The existing Local Plan and the new Local Plan is silent on the issue of subdivision of an existing residential dwelling. However, the NPPF allows for the development of isolated homes in the Countryside if the development would involve the subdivision of an existing residential dwelling.	Policy BotH21: Rural Housing. No change. These comments were made for information only.	None
BotH22: Residential Conversion of Rural Buildings	Query is raised over the application of this policy. For example, would the residential conversion of a rural building not be supported if a building is not of architectural and historic interest. This approach would be odds with national and local policy.	Policy BotH22: Residential Conversion of Rural Buildings None.	Objection Policy BotH22 supports the residential conversion of rural building where the building is of architectural and historical interest. This appears to imply a proposal will not be supported if a building is not of architectural and historic interest. This approach would not be in conformity with Local Plan Policy S3 and Paragraph 84 of the NPPF. This approach would be inconsistent with the approach proposed under Policy BotH25 of the Neighbourhood Plan. Reason The policy is not in general conformity with the strategic policies of the Local Plan and the NPPF. It should be noted

			that at paragraph 13.5 of the adopted Local Plan (2017) it is confirmed that <i>“The policies in this Local Plan are the strategic policies that Neighbourhood Plans will be required to be in conformity with.”</i>
Policy BotH23: Rural Worker Accommodation	In line with the policy in the new Local Plan.	Policy BotH23: Rural Worker Accommodation None. These comments were made for information only.	None
Policy BotH24: Replacement Dwellings	Is the prevention of the loss of two- or three-bedroom accommodation linked to the local housing profile. The Council appreciates the desire to resist the loss of a two- or three-bedroom property, but such properties could still be lost through an extension to an existing two or three-bedroom property, so will the policy achieve its objective? In addition, if Criteria C is complied with, how likely is it that the new build would have more bedrooms than was previously the case?	Policy BotH24: Replacement Dwellings None.	Comments The Neighbourhood Plan’s focus on the provision of two to three bedroom properties is noted as is the Parish Council’s view that restrictions on extensions to existing housing is considered unreasonable. However, the overall effectiveness of this policy is still queried.
Policy BotH25: Business Conversion of Rural Buildings	No comment.	Not applicable.	None
Policy BothH26:	No comment.	Not applicable.	None.

Working From Home			
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