

**NORTH WEST LEICESTERSHIRE DISTRICT COUNCIL**

**LOCAL PLAN COMMITTEE – WEDNESDAY, 20 JUNE 2018**

Title of report	<b>OUTCOMES OF THE LOCAL PLAN ISSUES CONSULTATION</b>
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Purpose of report	To outline to members the comments received during the Local Plan Issues consultation (Issues Consultation) undertaken in early 2018 and the implications arising as a result of some of these comments.
Council priorities	Business and Jobs Homes and Communities
<p>Implications:</p> <p>Financial/Staff</p> <p>Link to relevant CAT</p> <p>Risk Management</p>	<p>The cost of running the consultation was met from within existing budgets.</p> <p>None</p> <p>The Issues Consultation falls within what is defined as Regulation 18 consultation under planning legislation. Regulation 18 consultation is a requirement of the Town and Country Planning (Local Planning) (England) Regulations 2012. Not undertaking Regulation 18 consultation would mean that the reviewed Local Plan would likely be found unsound.</p>
<p>Equalities Impact Screening</p> <p>Human Rights</p> <p>Transformational Government</p>	<p>None</p> <p>None discernible</p> <p>Not applicable</p>

Comments of Head of Paid Service	The report is satisfactory
Comments of Section 151 Officer	The report is satisfactory
Comments of Deputy Monitoring Officer	The report is satisfactory
Consultees	Landowners, developers, local residents, neighbouring authorities, statutory consultees, Parish Councils, local interest groups and other stakeholders.
Background papers	<p>Local Plan Issues Consultation booklet - <a href="https://www.nwleics.gov.uk/files/documents/local_plan_partial_review_issues_consultation1/Local%20Plan%20review%20-%20consultation%20leaflet%202018.pdf">https://www.nwleics.gov.uk/files/documents/local_plan_partial_review_issues_consultation1/Local%20Plan%20review%20-%20consultation%20leaflet%202018.pdf</a></p> <p>Adopted Local Plan - <a href="https://www.nwleics.gov.uk/files/documents/adopted_local_plan_2011_20312/Adopted%20Written%20Statement.pdf">https://www.nwleics.gov.uk/files/documents/adopted_local_plan_2011_20312/Adopted%20Written%20Statement.pdf</a></p> <p>Housing and Economic Development Needs Assessment (HEDNA) - <a href="https://www.nwleics.gov.uk/pages/housing_and_economic_development_need_assessment_hedna">https://www.nwleics.gov.uk/pages/housing_and_economic_development_need_assessment_hedna</a></p>
Recommendations	<p><b>THAT THE COMMITTEE NOTES:</b></p> <p>i) <b>THE COMMENTS RECEIVED ON THE RECENT LOCAL PLAN ISSUES CONSULTATION; AND</b></p> <p>ii) <b>OFFICERS' RESPONSES TO THESE COMMENTS</b></p>

## 1.0 BACKGROUND

1.1 Members will recall that as a result of a) not allocating enough employment land to meet our identified need and b) Leicester City Council declaring an (unspecified) unmet housing need, the Inspector examining our now adopted Local Plan last year stated that he found the Local Plan sound, but on the condition that the Council began a review within three months of adoption. The beginning of the review was considered to be 'the publication of an invitation to make representations in accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012,' commonly known as an Issues consultation, where stakeholders are invited to give their views on what they consider should be included in the reviewed Local Plan.

1.2 The Issues consultation ran for 6 weeks, between 21 February 2018 and 4 April 2018. We contacted over 500 landowners, developers, local residents, neighbouring authorities, statutory consultees, Parish Councils, local interest groups and other stakeholders. The consultation was also publicised on the Council website and via social media. Copies of the consultation documents were also made available in all libraries in the district for inspection.

## **2.0 WHAT DID WE CONSULT ON?**

2.1 A [consultation leaflet](#) was produced which explained why we were beginning a review of the Local Plan so soon after adoption, and that we were proposing to undertake a partial review rather than reviewing every policy – as the Local Plan was adopted so recently that much of it was still relevant. It also explained how the review of the Local Plan fitted into the work being undertaken on a sub-regional level on the Strategic Growth Plan (SGP). In addition, it asked for views on the following questions:

1. Do you agree that the review should cover the period to 2036? If not why not?
2. Do you agree with our assessment of which policies need to be reviewed? If not, why not?
3. Which parts of the existing evidence base do you consider: (i) – remain relevant (ii) – need to be updated or replaced (and why)
4. Are there any other evidence base studies which are required, and if so, why?

## **3.0 WHAT RESPONSES DID WE RECEIVE?**

3.1 In total, we received 72 responses from a range of individuals and organisations. A summary of all comments received can be found in Appendix A. However the main points raised are as follows:

- Most respondents were supportive of the need to review the Local Plan, although some respondents questioned whether a full review would be more appropriate than a partial review.
- Nearly everyone who responded to Question 1 supported the plan period being extended up to 2036 from 2031. Reasons given for this included because it would be in accordance with the 15 year plan lifespan requirement for Local Plans in the draft NPPF and because it coincides with the Housing and Economic Development Needs Assessment (HEDNA) end date.
- A lot of respondents agreed with our suggestions on those policies which needed to be reviewed – with a large focus on housing, employment and infrastructure.
- There were mixed views on the proposal (as recommended by the Local Plan Inspector) to review the Area of Separation boundary between Coalville and Whitwick.
- Many respondents raised the Strategic Growth Plan (SGP) and the publication of the draft NPPF as issues that we need to take account of. There were also a number of suggestions to change settlement boundaries/limits to development (generally where respondents were promoting a site on the edge of a settlement), and suggestions of other specific sites that could be allocated for development.
- There were a mix of views on whether the HEDNA needed updating – some thought that as it was only completed in 2017 that it was sufficiently up-to-date and robust, whilst others thought it needed updating to take account of the SGP work, the

publication of new data, proposed national standard methodology for calculating housing need, etc.

- A number of respondents referenced the need to update the 2010 Employment Land Study - which we are already proposing to do – and economic evidence more generally.
- There weren't many suggestions of potential additional evidence base studies required – but those that were suggested included evidence for retaining the Area of Separation (which we are already proposing to do following the Local Plan Inspector's recommendation), highway capacity studies and open space/playing pitch studies.

#### **4.0 NEXT STEPS**

- 4.1 An initial officer response to each consultation comment can be found in Appendix A.
- 4.2 It should be noted that many of the issues raised are already being addressed – either through the production of new evidence (for example Employment Land Study, Area of Separation assessment, etc) or through ongoing work (for example the joint working with neighbouring authorities on the SGP, and understanding the implications of the new draft NPPF).
- 4.3 Where points have been raised that we agree with and which we consider necessitate a change to what is in the adopted Local Plan, we will look to incorporate these in to the next iteration of the reviewed Local Plan.
- 4.4 The next public consultation is expected to be an 'Emerging Options' stage (also falling under Regulation 18 of the Town and Country Planning Regulations), where we can set out our initial ideas on how to approach some of the major issues. This is expected to be undertaken in Autumn 2018.

#### **5.0 SCOPE OF REVIEW**

- 5.1 The Issues consultation made it clear that in view of the fact that the Local Plan had only recently been adopted it was intended that the review should be a partial review; not all aspects of the Local Plan would be covered. Instead the intention was to focus on those issues where there were gaps (for example employment land, local green spaces) or where external factors had changed (for example the draft NPPF and progress on the SGP).
- 5.2 A number of the representations to the Issues Consultation have suggested that the review should be widened, not least because of the possible implications arising from the revisions to the NPPF. Whilst it is the case that the draft NPPF does propose changes in respect of plan making, it is considered that these are not, in themselves, necessarily significant enough to warrant a wider review.
- 5.3 The Local Plan represents the Council's planning framework up to 2031. It provides the basis for making decisions on planning applications. Since the Local Plan was adopted in November 2017 a number of decisions have been made by Planning Committee which were contrary to the provisions of the Local Plan. This suggests that there are some aspects of the adopted Local Plan which may be of concern to members.

- 5.4 In order to be able to gauge what these concerns are it is proposed that all councillors be given an opportunity to identify any concerns they have regarding the adopted Local Plan, and what possible changes they would like to see to address these concerns. This will be done via a questionnaire shortly. It should be noted that in the interests of transparency any responses will, in due course, need to be put in to the public domain.
- 5.5 Officers will then review the responses and give consideration as to how (or if) any concerns could be addressed, whilst having regard to the need to comply with relevant national policies and the evidence base. If as a result of any matters raised by members it is apparent that the Local Plan review would be wider than currently anticipated, then it will also be necessary to consider any possible implications in terms of resources and timetable for the review. In respect of the latter, Policy S1 of the adopted Local Plan makes it clear that if the Local Plan is not submitted within 2 years of commencement of the review (i.e. February 2020) the policies will be out of date. This would mean that the Local Plan would be given little weight in decision making. The current timetable envisages submission for examination in January 2020. There is, therefore, little room for slippage.

## APPENDIX A – RESPONSES TO ISSUES CONSULTATION (BY QUESTION) AND OFFICER RESPONSES TO THEM

<b>1. Do you agree that the review should cover the period to 2036? If not why not? - Do you agree that the review should cover the period to 2036?</b>		
<b>Respondent</b>	<b>Summary of Response</b>	<b>Reply</b>
Mark Chadbourn	Yes.	Noted.
Tim Farley, Copesticks Ltd.	Yes	Noted
Ruth Mulvany 1	Yes	Noted.
Ruth Mulvany 2	it could be done in a shorter time frame	It is not clear from this wording whether the respondent is saying that a) she thinks the review should be undertaken more quickly or b) that it should cover a shorter timeframe. If a) then the adopted Local Plan requires a reviewed Local Plan to be submitted for examination within two years of commencing the review, which is a challenging timetable, and one which we consider could not be shortened any further. If b) then the revised draft National Planning Policy Framework requires that Strategic Policies (whether in a local plan or a strategic plan) should look ahead a minimum of 15 years. Assuming that this is confirmed when the Framework is finalised it would be necessary to roll the plan period forward to achieve this.
Lorna Measom	Whilst it might be economically sensible to extend the review period, being able to reconsider plans at an earlier stage would give an opportunity to take corrective action if this is found to be needed and would be cheaper than trying to rectify faults at a later date	The revised draft National Planning Policy Framework requires that Strategic Policies (whether in a local plan or a strategic plan) should look ahead a minimum of 15 years. Assuming that this is confirmed when the Framework is finalised it would be necessary to roll the plan period forward to achieve this. The draft NPPF also requires policies to be reviewed at least once every five years – so this provides an opportunity to take corrective action if needed.
David Bigby, Ashby Town Councillor	Yes	Noted
Michael Ball	Yes	Noted.
Ian Retson, Woodland Trust Volunteer	Yes	Noted.
Andrea Allgood	No - population and other projections are only estimates. The figures become even more unreliable the longer the period.	The Planning Practice Guidance makes it clear that the household projections published by the Ministry for Housing, Communities and Local Government should provide the starting

		point for estimating future housing needs. The Local Plan will also need to be reviewed prior to 2036, enabling any issues regarding unreliability to be dealt with through future reviews.
Chris Smith	No. There is a strong case to keep the review as limited as possible as there is likely to be other events, as yet unknown, that could trigger a review which would make redundant the more complex consideration to 2036.	The revised draft National Planning Policy Framework requires that Strategic Policies (whether in a local plan or a strategic plan) should look ahead a minimum of 15 years. Assuming that this is confirmed when the Framework is finalised it would be necessary to roll the plan period forward to achieve this. The draft NPPF also requires policies to be reviewed at least once every five years, enabling any as yet unknown issues to be dealt with through future reviews.
Andrew Large, Andrew Large Surveyors	Yes	Noted
Geoff Platts, Environment Agency	Yes	Noted
Geoffrey Brown, Charnwood Borough Council	Charnwood Borough Council agrees that it would be appropriate to roll forward the end date of the North West Leicestershire Local Plan to 2036. This would align with the important evidence based assessment work contained within the Leicester and Leicestershire Housing and Economic Development Needs Assessment and would also fit with the emerging Strategic Growth Plan. Charnwood Borough Council has also embarked on work to prepare a new Local Plan which would also have an end date of 2036.	Noted
Chris Tandy	I agree Local plan should be to 2036	Noted
Louise Wells, Persimmon Homes North Midlands	No clear preference stated	Noted
Mitzi Steven	Yes I do	Noted
Dawn Humpage	Yes	Noted
Philippa Kreuser, CT Planning	Agree. The review should cover the period up to 2036.	Noted
Measham Parish Council	Yes	Noted.
Barbara Lees	I have not got enough information to agree or object to this date but it sounds OK	Noted
John Jordan	Yes	Noted
Ian Webb, Ashby Civic Society	Yes	Noted

Ellie Jones , MPC	Agree	Noted
Tom Clarke, Theatres Trust	Yes	Noted
Philip Metcalfe, The National Forest Company	Yes	Noted
Robert Duckworth, Duckworth Planning and Design Ltd	Yes	Noted
Rebecca Thompson, Wallace Land Investments	It is agreed that the Local Plan should have a timeframe of at least 15 years after its adoption (this aligns with the emerging draft NPPF para 22). The proposed end date of 2036 is appropriate and accords with the timescales set out in the supporting evidence such as the 2017 HEDNA and the Memorandum of Understanding (MoU) between the Leicester and Leicestershire Housing Market Area (HMA) authorities. The proposed end-date should also be aligned with the plan periods of other HMA authorities.	Noted
Paul Watson, PRW Strategic Advice on behalf of IM Properties Ltd	The Review's focus on the period to 2036 is agreed. However the Leicester & Leicestershire Strategic Growth Plan will provide an important context for the Local Plan Review and so both its provisions to 2031 and its longer term perspective to 2050 should also be recognised in policy development.	Noted
Janet Hodson, JVH Town Planning Consultants Ltd	This review period coincides with the LEICESTER & LEICESTERSHIRE 2050: OUR VISION FOR GROWTH up to 2036. That document envisages that there will be a need for additional need for Housing and employment land over that period. The review should allocate land to meet the extra requirements in the period up to 2036. So on balance the review period is acceptable.	Noted
Chris Lindley for Mr & Mrs Mansfield	My clients consider that a review period to 2036 is appropriate. However it is important to ensure that the Local Plan is sufficiently aspirational to reflect the opportunities likely to emerge within North West Leicestershire and its HMA beyond 2036.	Noted
ID Planning for Litton Properties	We agree the review should cover the period to 2036 to ensure that longer term strategic needs are met within the District. The	Noted

	East Midlands Airport is an important growth location and consequently a time period to 2036 would be appropriate.	
Marine Management Organisation	No specific response has been given apart from general comments on the role of the organisation.	Noted
Natural England	We have no particular comments on the Regulation 18 consultation on a partial review of the adopted Local Plan	Noted
Packington Nook Residents Association	PNRA broadly accepts the proposal to extend the Local Plan period to 2036 to ensure continuity of the adopted policies, particularly in view of how long it has taken to get the current adopted Local Plan in place.	Noted
The Coal Authority	The Coal Authority has no specific comments to make at this early stage in the process	Noted
Define for Bloor Homes	This is supported but must reflect the evolving Strategic Growth Plan and is subject to further reviews as needed to stay up-to-date	Noted
Define for Rosconn Strategic Developments	This is supported but must reflect the evolving Strategic Growth Plan and is subject to further reviews as needed to stay up-to-date	Noted
Derbyshire County Council	This is supported due to the existing shortage of employment land, the possible need to accommodate unmet housing need in Leicester City and the emerging Strategic Growth Plan.	Noted
East Midlands Airport	Agreed as it is important to take a long term view for the district, however, further reviews will be needed to stay up to date and to allow other plans to be taken into account.	Noted
Erewash Borough Council	There are no issues which are felt to require a specific response at this stage of the Local Plan's production.	Noted
Fisher German for Richborough Estates (Ashby de la Zouch)	The Local Plan Review is supported and the proposed Review period up to 2036 is considered appropriate.	Noted
Fisher German for Richborough Estates (Appleby Magna)	The Local Plan Review is supported and the proposed Review period up to 2036 is considered appropriate.	Noted
Fisher German for Robert Botham	The Local Plan Review is supported and the proposed Review period up to 2036 is considered appropriate.	Noted
Gladman Developments Ltd	Gladman support this approach as it will bring the Local Plan in line with the end date of other Leicester and Leicestershire Local Plans.	Noted

GVA for Jelson Ltd and William Davis Ltd	2018 - 2036 is the minimum time frame that the Council should be looking to plan for. Indeed, if, for whatever reason, it encounters slippage or new evidence becomes available which looks beyond 2036, it may be necessary / appropriate to extend the Local Plan period beyond that date.	Noted
Home Builders Federation Ltd	The proposed date would be in accordance with the NPPF and would accord with supporting evidence such as the 2017 HEDNA and the Memorandum of Understanding (MoU) between the Leicester & Leicestershire Housing Market Area (HMA) authorities. The proposed end date should also be co-ordinated to align with the plan periods of other HMA authorities.	Noted
Highways England	We agree that the review period should cover the period to 2036, given that this will represent little more than a 15 year plan period once the Local Plan is adopted.	Noted
Iceni Projects For Money Hill Consortium	The MHC welcome an early review of the Local Plan. In accordance with the draft revised NPPF the process of reviewing the Local Plan should occur multiple times through the plan process and, as a minimum, every 5 years. Such reviews should plan for a 15-year period and, therefore, it is considered appropriate to have an end date of 2036.	Noted
DLP (Planning) Ltd for Langley Priory Estates	We agree that the review should cover the period to 2036 to meet the identified shortage of employment land as identified in the HEDNA and reflect the aspirations of the Strategic Growth Plan.	Noted
Oxalis Planning	the review period to 2036 is supported	Noted
Planning and Design Group for Quarry Plant and Industry Ltd (Former Heather Brickworks)	We agree with the extension of the Local Plan period to cover the period to 2036. This is in line with the NPPF and will ensure medium to long term provision is maintained.	Noted
Pegasus for Harworth Group (Lounge)	The extension of the plan period to 2036 is supported as it would be in line with the advice set out in the NPPF and Draft NPPF, HEDNA and Draft SGP	Noted
Pegasus for Harworth Group (Bardon)	The extension of the plan period to 2036 is supported as it would be in line with the advice set out in the NPPF and Draft NPPF, HEDNA and Draft SGP	Noted
Pegasus for Davidsons Developments Ltd	A review period to 2036 is supported as it would align with the HEDNA	Noted.

Pegasus for Hallam Land Management	The extension of the Local Plan period to 2036 is supported as it would be in line with the advice set out in the NPPF and Draft NPPF, HEDNA and Draft SGP	Noted
Pegasus for Western Range Ltd	A review period to 2036 is supported as it would align with the HEDNA	Noted
Planning Prospects for St Modwens Developments Ltd	No clear preference stated	Noted
Redrow Homes East Midlands Ltd	A review period to 2036 is supported as it would align with the HEDNA, emerging SGP, NPPF requirements and other plans in the HMA	Noted
Tetlow King for Rentplus UK Ltd	We agree with the proposed scope of the Review, including the lengthening of the Local Plan period to 2036. As the proposed changes to the NPPF include amendments to the calculation of housing need, a renewed emphasis on planning positively for the future, and the new requirement to review Local Plans every five years, this is an appropriate change.	Noted
Grace Machin via Vale Planning for Brackley Property Developments	We support the proposed plan period and support the proposal for the review to cover the period to 2036 provided that the employment requirements are fully met.	Noted

## 2. Do you agree with our assessment of which policies need to be reviewed? If not, why not?

Respondent	Summary of Response	Reply
Mark Chadbourn	Yes.	Noted.
Tim Farley, Copesticks Ltd.	Yes, infrastructure is important; could the review include a more permanent solution to the River Mease issue, e.g. through CIL?	Discussions are ongoing with partners regarding the River Mease. We do not currently have plans to adopt a CIL charging schedule.
Ruth Mulvany 1	Yes in particular the self-build custom build element. While there are only 32 individuals on the NWLDC self-build register information from build it UK plot finder shows more than 1000 people in the district and nearby area are actively searching for plots and registered with plot finder. On speaking with local residents that wish to self-build they are unaware the council register exists.	The Council fulfils its duty with respect to its responsibility for keeping a self-build and custom housebuilding register and the collection of the appropriate data. This is a national requirement and it is for the individual to advise the Council that they wish to be placed on the register.
Ruth Mulvany 2	Custom and self-build policy is important. The Council should explore linking these to affordable housing policies.	The Local Plan Review is intended to include the development of a policy to address the provision of self and custom building housing.

Lorna Measom	Yes, these policies need to be reviewed in line with Central Government	Noted. We acknowledge that the Local Plan review will need to fully comply with emerging Government planning policy, including the draft NPPF.
David Bigby, Ashby Town Councillor	Yes, but if the Ashby Neighbourhood Plan is approved at referendum and includes allocation of Local Green Space then there is no need for the revised Local Plan to cover Local Green Space for Ashby. Indeed, it should avoid rendering out of date any aspects of the Ashby Neighbourhood Plan if at all possible as development of the Ashby Neighbourhood Plan has been a long and expensive process. The changes to the NPPF need to be fully taken into account. It is also essential that the review of employment land is sufficiently specific in its allocations that current policies S3 (s) and Ec2 (2) can be deleted from the revised plan.	We will look at the allocation of Local Green Spaces as part of the Local Plan review, however it needs to be considered that neighbourhood plan policies would be superseded if they were made prior to the adoption of the reviewed Local Plan. The review will need to allocate enough employment land to meet our identified need. The need to revise or delete policies S3(s) and Ec2(2) will form part of the review process. We acknowledge that the Local Plan review will need to take account of the emerging Government planning policy, including the draft NPPF.
Michael Ball	<p>"The identification of Local Green Spaces" should be amended to "The identification and protection of Local Green Spaces. NWLDC must press HS2 to clear up the current confusion over the route through the district by means of a definitive statement of route. Policy H3 must then be amended to eliminate the "either/or" uncertainty.</p> <p>Getting the Ashby Canal reopened from Snarestone to Donisthorpe (not just Measham) should be a major priority for NWLDC and would boost tourism in the district. Policy IF6 should make reference to this intention.</p> <p>Policy IF4 should make plain the necessity of upgrading the A42 to motorway standard from J11 to East Midlands Airport to - the future prosperity of the district depends on it.</p>	<p>The purpose of Local Green Spaces as set out in the NPPF is to provide protection against development. This will be made clear in any policy wording if it is decided to include local green Spaces as part of the review. HS2 is a national government led infrastructure project and the Council is a consultee. The policy will however be amended to reflect the most up to date position with respect to HS2. The District Council supports the restoration of Ashby Canal. The adopted Local Plan protects the route of the Ashby Canal as far as Donisthorpe.</p> <p>Works to the A42 fall under the responsibility of Highways England and is not a matter for the Local Plan to implement.</p>
Ian Retson, Woodland Trust Volunteer	Yes but more emphasis is needed to protect local green spaces, woodlands including ancient trees.	Noted. The purpose of Local Green Spaces as set out in the NPPF is to provide protection against development. Policy En1 includes protection of ancient woodlands
Andrea Allgood	No. The Area of Separation between Coalville and Whitwick should be maintained to respect the identity of both communities.	The Local Plan Inspector highlighted that a review of the boundaries should form part of a wider review of the Local Plan, particularly in the light of any increased development needs.
Chris Smith	I see no reason to review the area of separation between Coalville and Whitwick.	The Local Plan Inspector highlighted that a review of the boundaries should form part of a wider review of the Local Plan,

	<p>Similarly, the local green spaces policy is to leave it to neighbourhood plans. This has worked well in Ashby and I see no reason to change the policy. The Council could do much more to encourage neighbourhood plans. Lichfield Council seem to have a much more proactive approach and most areas in the district are developing neighbourhood plans.</p>	<p>particularly in the light of any increased development needs.</p> <p>Noted. The issue of encouraging more Neighbourhood Plans is beyond the scope of the Local Plan review. However, following the recent Peer Review this issue is to be looked at.</p>
Andrew Large, Andrew Large Surveyors	<p>Policy H5 is too restrictive and needs to be reviewed to allow for local needs/self-build housing in rural areas.' A different approach is required similar to neighbouring authorities who allow for controlled development in small settlements, for example South Derbyshire.</p>	<p>Policy H5 is consistent with the existing NPPF and the draft revisions which make it clear that exceptions sites are concerned with meeting needs for affordable housing only. The issue of Custom and Self Build is one which will need to be considered as part of the Local Plan review. Policy S2 provides for development commensurate with the status of a settlement.</p>
Geoff Platts, Environment Agency	<p>Yes</p>	<p>Noted</p>
Geoffrey Brown, Charnwood Borough Council	<p>North West Leicestershire District Council will clearly need to have regard to the reshaping of Government planning policy and its effects on the scope of the new plan. Amongst other changes the Draft NPPF reinforces the importance of joint working between local planning authorities. In the case of Leicester and Leicestershire it will be important to have regard to the collaborative work underpinning the Strategic Growth Plan, particularly on the distribution of housing.</p>	<p>NWLDC is committed to working with the other authorities in Leicester and Leicestershire to bring forward both our individual Local Plans and the Strategic Growth Plan. We also acknowledge that the Local Plan review will need to fully comply with emerging Government planning policy, including the draft NPPF.</p>
Chris Tandy	<p>Policy on River Mease will need to be updated and capacity assessed to support any allocations in the River Mease catchment area.</p>	<p>Noted. Discussions are ongoing with partners regarding the River Mease.</p>
Louise Wells, Persimmon Homes North Midlands	<p>Agree with the majority of the policies that have been put forward - with the exception of space standards. Persimmon Homes do not agree that bedrooms should have minimum sizes as consumers use bedrooms as appropriate, i.e. starter homes may use the small bedroom as a nursery or office neither of which require the same amount of floor space and consumer may buy these homes with this in mind. This would also have an effect on issues relating to density of development.</p>	<p>Comments regarding space standards are noted; no decision has been made as to whether such policies should be included as part of the review. It is acknowledged that information relating to housing sites and likely delivery rates will need to be updated as the review progresses. A review of the Area of Separation has been identified as a further piece of work to be undertaken.</p>

	<p>Policies H2 &amp; H3 need to be reviewed and updated and it should not automatically be assumed that all consented sites will be developed; it is important to consider lapse rates. There is particular concerns regarding land North and South of Grange Road, Hugglescote and how much of this be developed. If additional housing beyond 2031 is required then new allocations must be identified - including that of the site at Broom Leys Farm in Coalville. Policy En5: Areas of Separation should be reviewed as it is considered that is a restrictive and inflexible policy that should omit the land at Broom Leys Farm from the Area of Separation.</p> <p>The inspector's report identified the findings of the Settlement Fringe Report that some level of development could not be ruled out - this should be acknowledged.</p>	
Mitzi Steven	Yes I agree	Noted
Dawn Humpage	Yes I agree	Noted
Karen Edwards, Ashby de la Zouch Town Council	Ashby de la Zouch Town Council support the identification of Local Green Spaces in the Local plan for areas where a Neighbourhood Plan is not in place.	Noted
Philippa Kreuser, CT Planning	Agree with the list of main matters and partial matters put forward by the Local Authority which should form part of the Partial Review of the Local Plan. Housing distribution and allocated sites in the District needs to ensure that existing settlements are contributing to housing delivery as well as urban extensions and strategic growth areas. The Limits to Development boundaries around settlements should be revisited to maximise the use of sites that are well related to the built-up area of sustainable settlements.	If the evidence points to a need to consider additional allocations then we would need to consider all potential sites on their own merits. The need to review the Limits to Development will be partly dependent upon the development needs which need to be accommodated in the district.
Measham Parish Council	Yes	Noted
Barbara Lees	Sounds OK	Noted
John Jordan	No. We already have far more houses planned than any other area in NW Leicester.	Noted, however the need for additional development will have to take account of the Strategic Growth Plan and any revised Memorandum Of Understanding, as well as other evidence relating to housing need.
Ian Webb, Ashby Civic Society	Yes & in addition we would like to add 1 Housing, employment and shopping need and allocations,	Noted. 1. It will be important to ensure that the review of the Local Plan ties in with the sub-regional work on the Strategic Growth

	<p>In particular the distribution of regional OAN (Objectively Assessed Needs) to district placements. This also to include consumption of Brownfield Sites.</p> <p>2 We would like to add SHLAA &amp; SHELAA. We recognise that an up to date HEDNA review is called for below. This to include the required Local Industry Employment land</p> <p>3 A review of the boundaries of the Area of Separation between Coalville and Whitwick.</p> <p>3.1 Area of Separation between Blackfordby, Moira, Woodville &amp; Ashby de la Zouch</p> <p>3.2 In particular the protection of the Green Belt areas</p> <p>4 The identification of Local Green Spaces.</p> <p>5 Need to have evidence of River Mease impact of any allocations in catchment area 2025 to 2036</p> <p>6 Traffic impact on local highways network of any allocations of housing or employment</p> <p>7 Educational Impact of housing &amp; employment</p> <p>8 Community Hall for Ashby de la Zouch</p>	<p>Plan and potential new Memorandum of Understanding on housing distribution. 2. We intend to update the SHELAA later in the year and also update our 2010 Employment Land Study. 3 The area of separation between Coalville and Whitwick is something that the previous Local Plan Inspector advised us to consider as part of the review. We are not proposing an area of separation between Blackfordby, Moira, Woodville &amp; Ashby de la Zouch at this stage. There are no green belt areas in the district. 4 We will consider the identification of local green spaces as part of the review. 5 Discussions are ongoing with partners regarding the River Mease and this matter will be kept under review. 6 &amp; 7 Any potential allocations will also need to be assessed in terms of impact on local infrastructure, including highways and education. 8 More information will be required on the potential for a new Community Hall in Ashby de la Zouch, including any evidence of funding and a potential site. This is something that would have perhaps been more appropriate to include in the Ashby de la Zouch Neighbourhood Plan.</p>
Ellie Jones , MPC	<p>Agree that housing, employment and shopping need and allocations; and, infrastructure requirements as a result of new development should be reviewed. Land within the ownership of Hanson UK (about 14.9Ha), positioned on the northern side of Meadow Lane; on the north eastern side of the Coalville urban area/south Whitwick should be considered for development. The site is contiguous with the current development boundary and well related to services and facilities. The allocation of this site would assist in the delivery of much needed housing land without causing erosion to the area of separation between Coalville and Whitwick as currently protected by policy EN5.</p>	<p>Noted</p> <p>Noted. The issue of potential housing allocations will need to be addressed when the scale of development requirements are clarified.</p>
Tom Clarke, Theatres Trust	<p>We agree with the Council's assessment, but suggest this is also an opportunity to make minor revisions or clarifications to existing policies. For example, we would suggest that existing paragraph 9.10 in support of Policy IF2 includes a direct reference to theatres. This would ensure the plan more explicitly reflects the types of facilities conducive to improving social and cultural wellbeing as set out in the NPPF. eg "They</p>	<p>Noted</p>

	can include cultural facilities such as public libraries, <<THEATRES>> and museums.	
Philip Metcalfe, The National Forest Company	Agree	Noted
Robert Duckworth, Duckworth Planning and Design Ltd	All settlements should have a limit to development that allows for sufficient growth with a variety of house types to satisfy the market. Development sustainability needs to be reviewed to allow settlements that are well populated but missing a shop to be considered sustainable, particularly with the change to shopping habits such as 'store to door'. Policy H1 and H2, The identified sites need to be considered if there are delays in the delivery. Policy EC2, There is a demand for rural based sites which are not typical industrial units.	Noted. If the evidence points to a need to consider additional allocations then we would need to consider all potential sites on their own merits. The need to review the Limits to Development will be partly dependent upon the development needs which need to be accommodated in the district. When considering where new development should go, the issue of sustainability is key - and while acknowledging that shopping habits, etc have changed over recent years with more use now made of store to door services, it is important to also consider that not all of the population have access to the internet and that other services such as doctors, schools, still require travel.
Rebecca Thompson, Wallace Land Investments	Any review be undertaken in accordance with the Government's proposed changes to both the NPPF and the NPPG together with proposals set out in the Leicester and Leicestershire SGP and any new MOU.	The need to take account of the Strategic Growth Plan and revisions to both the NPPF and NPPG is recognised.
Paul Watson, PRW Strategic Advice on behalf of IM Properties Ltd	The Partial Review should commit to addressing explicitly the provision for strategic B8 development: and also the need & demand for, and the potential of, the M42 corridor to accommodate strategic development, with necessary joint working with all other local planning authorities along the corridor, including those to the south of Leicestershire in the West Midlands.	The need and demand for strategic B8 uses is set out in the Strategic Distribution study 2014 (and 2016 update). It is anticipated that a further review of this evidence will also be completed at a HMA-wide level later this year. The location of any additional development will need to have regard to a range of factors, including need and access to the strategic highway network, which includes the M/A42.
Janet Hodson, JVH Town Planning Consultants Ltd	Yes this is effectively all the main provisions of the Local Plan. New allocations may involve the alteration of development boundaries and may have a knock on effect upon existing allocations. We also consider that the Local Plan should expressly include polices to bring forward sustainable development sites that lie at the edge of existing urban area that lie outside the administrative area of NWLDC. The sustainability of proposed sites is not diminished by the presence of an administrative boundary.	Noted. The Local Plan can only identify suitable sites within the boundaries of the district. Issues relating to development which straddles a boundary would need to take place in the context of the Duty to Cooperate.
Andrew Granger for Cadwallader Family	We fully agree with the Council's recognition of the need to review the District's housing policies in light of the emerging	Noted

	Leicester and Leicestershire Strategic Growth Plan. Therefore, the proposed update of housing policies contained within the Local Plan is considered to be necessary in order for the plan to be found sound.	
Chris Lindley for Mr & Mrs Mansfield	It is noted the Council does not consider that “As the Local Plan was adopted in November 2017 most of it will not need to be reviewed – this will therefore be a ‘partial’ review”. The evolving policy context (including the strategic growth plan and the review of the NPPF) suggests a more radical complete review of the Local Plan is warranted if the Council is to fully respond to meeting development needs of the HMA and other neighbouring authorities. The area around Blackfordby, Woodville and Swadlincote have been proven to be acceptable in planning terms and attractive to the development industry. However, there is sometimes little acknowledgement of the role these locations play within the District and the role they are capable of playing in the future. A thorough review of the spatial approach of the Local Plan is required, backed up by a robust evidence base and sound monitoring data. The latter is particularly important in light of the proposed “Housing Delivery Test” within the draft revised NPPF.	The extent of the review will need to take account of the finalised NPPF and NPPG and consider how the adopted Local Plan conforms to these. The need for additional development will have to take account of the Strategic Growth Plan and any revised MOU, as well as other evidence relating to housing need.
ID Planning for Litton Properties	We agree the review should include housing, employment and shopping needs and allocations as set out in the consultation document. As indicated above, it is our view that further growth can be accommodated in the general East Midlands Airport location and that our client’s site provides an appropriate location to accommodate some of that future growth.	Noted. If the evidence points to a need to consider additional allocations then we would need to consider all potential sites on their own merits.
Historic England	The consultation presents an opportunity to review policy CC1 and the need for the ‘Areas potentially suitable for Medium / Large scale wind energy and small scale wind energy’ maps. The review would also be a good opportunity to review policy HE1, particularly in light of the forthcoming revised NPPF.	At this stage it is unclear as to whether there is a specific reason to review policy CC1, as it would appear to still satisfy paragraph 150(b) of the draft NPPF. However we would agree that generally it is important for the review to take into account the content of the draft NPPF and any implications arising.
Define for Bloor Homes	The housing policy to ensure a sufficient supply of housing in accordance with the NPPF, the unmet need of Leicester City and the evolving Strategic Growth Plan. The Spatial Strategy,	The need to take account of the Strategic Growth Plan is recognised.

	Settlement Boundaries and Countryside Policies need to be reviewed to ensure that the needs of rural settlements can be sustainably met. New policies relating to space standards and custom or self-build plots may lead to viability issues and increasing provision rather than a restrictive policy requirement could be the best solution.	It is not clear as to why it is considered that the needs of the rural settlements are not addressed by the current policies. The impact of all policies upon viability will need to be considered as required by the NPPF/NPPG.
Define for Rosconn Strategic Developments	The housing policy to ensure a sufficient supply of housing in accordance with the NPPF and the unmet need of Leicester City to provide a rolling 5 year supply. The Spatial Strategy, Settlement Boundaries and Countryside Policies need to be reviewed to ensure that the needs of rural settlements can be sustainably met. New policies relating to space standards and custom or self-build plots may lead to viability issues and increasing provision rather than a restrictive policy requirement could be the best solution.	The need to take account of the Strategic Growth Plan is recognised. It is not clear as to why it is considered that the needs of the rural settlements are not addressed by the current policies. The impact of all policies upon viability will need to be considered as required by the NPPF/NPPG.
Derbyshire County Council	Sound justification for an early review based on emerging issues of housing, employment and infrastructure. The impact of the EM Strategic Rail Freight Interchange on the housing and employment needs of the District is likely to change as the site develops over the next few years so should be a matter for monitoring and possible review through the Local Plan review process.	Noted - Although at present the development of the SRFI is at the very early stages, and so at this time it is not possible to update our existing evidence with any greater certainty than has already been done.
East Midlands Airport	Agree with main matters to be reviewed. Employment needs and allocations are specifically mentioned and it is assumed that this includes a review of the policies relating to the Airport (principally Policy Ec4, but also Ec5 and Ec6). Also agreed is the review of infrastructure, but it should be widened to also include requirements as a result of new development, this should be widened to include infrastructure requirements that supports and enables economic activity and growth from existing sites.	A review of the policies relating to EMA will have regard to any new evidence although we are not aware of any significant changes in circumstances or issues which would necessitate a significant shift in approach.
Fisher German for Richborough Estates (Ashby de la Zouch)	The main matters are considered to be housing (including unmet need), employment and shopping with their respective infrastructure requirements. Allocated housing sites should include small and medium sites to counter long lead in times for strategic sites such as the proposed Northern Gateway in the SGP.	Noted. The issue of potential housing allocations, including what type of sites, will need to be addressed when the scale of development requirements are clarified.

Fisher German for Richborough Estates (Appleby Magna)	The main matters are considered to be housing (including unmet need), employment and shopping with their respective infrastructure requirements. Consideration needs to be given to non-strategic employment and housing sites which can deliver more quickly than strategic ones such as the proposed Northern Gateway in the SGP.	The comments regarding the role of non-strategic housing and employment sites are noted, but will need to have regard to the scale of any future development needs.
Fisher German for Robert Botham	The main matters are considered to be housing (including unmet need), employment and shopping with their respective infrastructure requirements. Allocated housing sites should include small and medium sites to counter long lead in times for strategic sites such as the proposed Northern Gateway in the SGP.	Noted. The issue of potential housing allocations, including what type of sites, will need to be addressed when the scale of development requirements are clarified.
Gladman Developments Ltd	Whilst the policy areas identified for inclusion within the Local Plan Review are not disputed, it should be a full rather than partial review of the Local Plan. This is principally because of the newly revised Framework which will introduce significant changes to national policy. The Strategic Growth Plan, once adopted, is also likely to necessitate significant changes. This will ensure that once adopted, the Local Plan Review conforms with the most up to date national policy.	The extent of the review will need to take account of the finalised NPPF and NPPG and consider how the adopted Local Plan conforms to these. The need for additional development will have to take account of the Strategic Growth Plan and any revised MOPU, as well as other evidence relating to housing need.
GVA for Jelson Ltd and William Davis Ltd	Our clients agree with the broad scope of the review as set out by the Council and, in particular, the need for the review to look again at the Area of Separation, including the evidence underpinning its extent / boundaries. If the Memorandum of Understanding for the distribution of development is not consulted on then the Local Plan Review may be the only available forum for it to be tested. The proposals for strategic growth outlined in the SGP will need to feature in the LPR.	Noted
Home Builders Federation Ltd	Policies need to be reviewed because of the shortage of employment land, declared unmet housing needs in Leicester city and in the light of the changes to both the NPPF and NPPG together with the proposals set out in the Leicester & Leicestershire SGP including the proposed step change in growth locations.	The extent of the review will need to take account of the finalised NPPF and NPPG and consider how the adopted Local Plan conforms to these. The need for additional development will have to take account of the Strategic Growth Plan and any revised MOU, as well as other evidence relating to housing need. The need to address the shortfall in employment land is recognised.
Highways England	We agree with your assessment of the policies which need to be reviewed, particularly the need to consider infrastructure	Noted

	requirements of new development proposals. We also agree that the review should take account of the Leicestershire Strategic Growth Plan and the outcome of the current government consultation on the draft revision of the NPPF.	
Iceni Projects For Money Hill Consortium	Future policies that support the economy should retain flexibility. A long term solution to the River Mease issues should be prioritised so that development or delivery rates are not impeded.	Noted. The Council is continuing to work with partners including the Environment Agency and Severn Trent to implement a long-term solution to the River Mease issue.
DLP (Planning) Ltd for Langley Priory Estates	Given the identified shortage of employment land it is essential that the Council review allocations across the District and ensure sufficient land is allocated to meet the need for the plan period in accordance with the NPPF. The supply of employment land needs to be of a range of sites and sizes, so flexibility is created for the market to maximise job growth.	We would agree that the provision of additional employment land to meet identified needs is one of the major issues that the review will have to address. The type of sites that are allocated will, subject to being available, need to reflect the need and what the market is likely to bring forward.
Leicester City Council	We welcome the statement that the review of the Local Plan will 'need to take in to account the...Strategic Growth Plan and any subsequent agreements that are made with the other Leicestershire authorities in respect of the distribution of new housing and employment'.	Noted
Mr & Mrs K Goodwin	The Limits to Development for Packington cannot be justified, are not consistent with the Planning (LB&CA) Act 1990 or the NPPF and would contravene Policy S5 in the light of the adopted route of HS2. development to the east of the village would be sustainable and help to provide housing for unmet needs from Leicester City.	The Limits to Development and the Conservation Area Boundary are designated under different legislation and are for different purposes. At present Packington has one allocated site, which is currently being developed, to the South East of the village and any further development allocations will be considered on their own merits, on a site by site basis.
Crane & Walton for Mr D Smith & Mrs M Smith	The Local Plan Map does not identify the Travelling Showman's site at Oakthorpe and this needs to be amended.	As an existing site it is not necessary to specifically identify the site on the policies map.
Oxalis Planning	Support for a strategic approach to employment and housing provision, with associated strategic transport routes, in particular the Northern Gateway and the Coalville area. Believe there is an opportunity for additional employment in north of the district. The impact of HS2 on approved housing sites may mean that employment is more appropriate in these locations. Support creation of new settlements. Protection of environmental, historic and other assets (ie the Forests) is also supported.	Noted. The impact of HS2 on specific sites will be taken into consideration when assessing which sites should be allocated and for what use.

Planning and Design Group for Quarry Plant and Industry Ltd (Former Heather Brickworks)	We agree with the revised scope, but notwithstanding the shortfall of employment provision, the housing land delivery needs to be given equivalent weight given the emerging NPPF and SGP and a heavy reliance on a single strategic site at Ashby de la Zouch.	The issue of the provision and delivery of housing is a matter which will need to have regard to the outcome of the Strategic Growth Plan and any revised MOU, as well as other evidence relating to housing need.
Pegasus for Harworth Group (Lounge)	This approach is agreed. It is considered that a review of employment opportunities should not be restricted to local employment opportunities only, and should be expanded to consider the potential for meeting wider employment opportunities identified within the Strategic Growth Plan.	Noted. It will be important to ensure that the review of the Local Plan ties in with the sub-regional work on the Strategic Growth Plan.
Pegasus for Harworth Group (Bardon)	This approach is supported. It is considered that a review of employment opportunities should not be restricted to local employment opportunities only, and should be expanded to consider the potential for meeting wider employment opportunities identified within the Strategic Growth Plan.	Noted. It will be important to ensure that the review of the Local Plan ties in with the sub-regional work on the Strategic Growth Plan.
Pegasus for Davidsons Developments Ltd	It is considered that the suggested matters are fundamental and would potentially have implications for the Local Plan as a whole. A full review is therefore more appropriate especially as the unmet need from Leicester City is still a 'notional guide figure' and further allocations may be needed.	Notwithstanding that the policies proposed for review are significant it is not agreed that a full review of the Local Plan is automatically needed, the final scope of the review will need to have regard to the outcome of the NPPF review and the Strategic Growth Plan and any revised MOU, as well as other evidence relating to housing need.
Pegasus for Hallam Land Management	This approach is supported.	Noted
Pegasus for Western Range Ltd	It is considered that the suggested matters are fundamental and would potentially have implications for the Local Plan as a whole. A full review is therefore more appropriate especially as the unmet need from Leicester City is still a 'notional guide figure' and further allocations may be needed.	Notwithstanding that the policies proposed for review are significant it is not agreed that a full review of the Local Plan is automatically needed, the final scope of the review will need to have regard to the outcome of the NPPF review and the Strategic Growth Plan and any revised MOU, as well as other evidence relating to housing need.
Planning Prospects for St Modwens Developments Ltd	The schedule of policies which are to be reviewed appear to address the matters which are being considered via the Local Plan Review.	Noted
Redrow Homes East Midlands Ltd	The Local Plan will need to take into account the SGP and any other subsequent agreements such as the Memorandum of Understanding to assist in the meeting of unmet need notably that of Leicester City. The proposed / eventual changes to the NPPF / NPPG will also need to be taken into account.	Noted. The need for additional development will have to take account of the Strategic Growth Plan and any revised MOU, as well as other evidence relating to housing need.

Ruth Cox	The Housing policies should include the infill land at Leicester Road Ibstock.	Sites included in the SHELAA will be considered on their merits should there be a need for additional allocations once housing numbers are finalised.
Tetlow King for Rentplus UK Ltd	We agree with the proposed scope of the review. Policies H4, H5 and H6 should be reviewed to accord with the draft NPPF. This review is an appropriate time to set the target for affordable homes with review mechanisms. Consider scheme viability in determining the need for introducing the national optional technical standards for housing. The Glossary should also be reviewed to ensure continued compliance with the NPPF as the proposed changes include a number of updates and new definitions.	Noted
Grace Machin via Vale Planning for Brackley Property Developments	We agree that all policies relating to employment land provision and employment land allocations should be reviewed and re-assessed taking into account the Strategic Growth Plan. We believe that sufficient land, within the right locations and of the right type to meet the specific employment needs of the area must be allocated for the Local Plan to be found sound.	We would agree that it is important to take into account the work being undertaken at a sub-regional level on the Strategic Growth Plan when preparing the Local Plan review. It is also accepted that the employment elements of the Local Plan will need to be reviewed and new employment allocations potentially made to meet any outstanding need.
Woodland Trust	Policy EN1 and particularly where it refers to protection of ancient woodland, the draft NPPF shows a clear direction of travel from central Government to strengthen the protection of irreplaceable ancient woodland. We would therefore like you to reconsider your ancient woodland protection policy in the light of this likely strengthening of its protection in national policy.	The Local Plan Review will have regard to emerging changes to the National Planning Policy Framework. If changes are confirmed in the final publication of the NPPF later in 2018 these will need to be taken into account as part of the review.

### 3. (ai) Which parts of the existing evidence base do you consider remain relevant?

Respondent	Summary of Response	Reply
Mark Chadbourn	Retail strategies - the picture is changing very fast because of wider social and technological changes. Much evidence even from a couple of years ago is becoming outdated. The tourism strategy - may well be the main employment growth with the decline of particular manufacturing and	The economic benefits from both the retail and tourism sector are recognised and the District Council is committed to supporting the creation of a sustainable local economy. Retail studies undertaken in 2012, 2014 and 2016 were used to inform preparation of the Local Plan and the need to update them is being considered.

	industrial areas identified by the Bank of England. Should be strengthened and sharpened.	
Ruth Mulvany 1	All of them	Noted
Lorna Measom	All of the above	Noted
David Bigby, Ashby Town Councillor	Most	Noted
Ian Retson, Woodland Trust Volunteer	All especially Leicester-Burton rail study	Noted
Geoffrey Brown, Charnwood Borough Council	The Leicester and Leicestershire HEDNA remains an important part of the evidence base for informing local plans.	Noted
Mitzi Steven	Anything 2 years or less since updated.	We consider this to be too broad an approach as different subject matters will have different time sensitivities and lifespans.
Dawn Humpage	I think they all remain relevant and should be continually re-assessed.	Noted
Measham Parish Council	All	Noted
Philip Metcalfe, The National Forest Company	National Forest Strategy remains relevant.	Noted
Janet Hodson, JVH Town Planning Consultants Ltd	All the evidence base needs to be up to date otherwise how will it pass the requirements of the NPPF	Noted
Andrew Granger for Cadwallader Family	It will be necessary for the Local Plan review to establish an updated housing requirement for the District. Whilst it is broadly accepted by all the local planning authorities within the HMA that the OAN included within the HEDNA is the most up-to-date evidence available, the Local Plan review needs to take into account the yet to be agreed MOU regarding the distribution of unmet need from Leicester and Oadby & Wigston. It is essential for the Local Plan Partial Review to explore a 'dispersal' spatial strategy for any unmet housing needs that the District may be required to accommodate.	The recently published Planning Practice Guidance sets out a standard methodology which it is proposed should be used instead of studies such as the HEDNA. If this is confirmed in the final publication later in 2018 then the implication of this will need to be taken in to account as part of the review. As has been noted, no decision has been made with respect to the distribution of housing across the County as a result of Leicester City declaring an unmet need. This matter is the subject of ongoing discussion across the Housing Market Area.
ID Planning for Litton Properties	If the publication version of the Local Plan Review is not due until late 2019, an update to the HEDNA could be carried out late 2018/early 2019 to help inform progress from the initial thoughts consultation (autumn 2018) to preparation of the Publication version (Autumn 2019) before submission to the Secretary of State for Examination.	The recently published Planning Practice Guidance sets out a standard methodology which it is proposed should be used instead of studies such as the HEDNA. If this is confirmed in the final publication later in 2018 then the implication of this will need to be taken in to account as part of the review.

Gladman Developments Ltd	The HEDNA remains up to date and relevant for now	Noted
GVA for Jelson Ltd and William Davis Ltd	The HEDNA remains up to date and relevant for now	Noted
DLP (Planning) Ltd for Langley Priory Estates	Housing and Economic Development Needs Assessment (Jan 2017)	Noted
Planning Prospects for St Modwens Developments Ltd	We agree that the HEDNA assessment addresses the District's needs up until 2036, however, the HEDNA is being reviewed as part of the Strategic Growth Plan and could be subject to amendments. The Council will therefore need to review this evidence, to ensure that any updates to the existing evidence base is fully considered and reflected in the new Local Plan.	We would agree that it is important to take into account the work being undertaken at a sub-regional level on the Strategic Growth Plan when preparing the Local Plan review.
Grace Machin via Vale Planning for Brackley Property Developments	Whilst the HEDNA, published in January 2017, is currently considered up-to-date, it is considered imperative to keep this document under review, taking into account the ongoing employment land needs of the area and the provision of new developments or the loss of employment land, such that the current Local Plan partial review reflects the genuine needs of the District for the full plan period to 2036, with opportunities for choice and changes in the employment sector.	Noted. Evidence on employment land needs will be updated as and when we consider it to be required, but we would agree that at present the HEDNA represents an up-to-date position.

### 3. (a) Which parts of the existing evidence base do you consider need to be updated or replaced (and why)?

Respondent	Summary of Response	Reply
Mark Chadbourn	Most employment opportunities will require a technological foundation. It would be good to see evidence of the core systemic support - from super-fast broadband and 4G coverage on through - as this will underpin where employment areas should be identified.	Noted. High-speed broadband and other communications networks have a vital role in supporting sustainable economic growth, as well as the provision of local community facilities and services. Policy IF1 identifies the provision of superfast broadband as part of new developments.
Ruth Mulvany 1	Housing needs should recognise custom and self-build	The Local Plan Review is intended to include the development of a policy to address the provision of self and custom building housing.
Ruth Mulvany 2	Self-build register is not widely known about	The Council fulfils its duty with respect to its responsibility for keeping a self-build and custom housebuilding register and the collection of the appropriate data. This is a national requirement and it is for the individual to advise the Council that they wish to be placed on the register. Information is available on the Council's

		website and this issue will received further publicity as part of the Local Plan Review.
Lorna Measom	All as and when new evidence is found	Noted
David Bigby, Ashby Town Councillor	Sites designated as Local Green Space in the emerging Ashby Neighbourhood Plan should be removed from the SHELAA particularly in view of the pressure for small sites to be allocated. The Ashby Cycling Strategy is already out of date as recent developments are not taken into account and does not assess all potential routes.	The SHELAA is a technical document which helps to identify potential sites for housing and employment it does not mean sites will either be allocated or receive planning permission. The sites are assessed as part of the process of including them in the SHELAA, a Local Green Space designation would be identified as a constraint on the site and affect the suitability of the site for development. The cycling SPD comments have been received as part of that consultation and will be considered as part of a separate report.
Michael Ball	<p>A Cycling Strategy is needed for the total district, especially that part within the National Forest - safe, green cycle links from Ashby and other surrounding communities to the Hicks Lodge cycle centre are particularly important.</p> <p>If NWL is to take some housing load from Leicester City and other districts, justification is needed. There are large areas of brownfield land derelict in the city suitable for redevelopment. Building even more houses in NWL for people who work in the city is not a sustainable approach and should be encouraging shorter home-work distances.</p>	<p>Draft Cycling Strategies have been prepared for both Coalville and Ashby de la Zouch. Between February and April 2018 we consulted on whether these strategies should be adopted as Supplementary Planning Documents. These results of the consultation are being considered as part of a separate report.</p> <p>No decision has been made with respect to the distribution of housing across the County as a result of Leicester City declaring an unmet need. This matter is the subject of ongoing discussion across the Housing Market Area.</p>
Andrea Allgood	Housing & Economic Development Needs Assessment There is much uncertainty following the Brexit vote.	The recently published Planning Practice Guidance sets out a standard methodology which it is proposed should be used instead of studies such as the HEDNA. If this is confirmed in the final publication later in 2018 then the implication of this will need to be taken in to account as part of the review.
Geoff Platts, Environment Agency	The Strategic Flood Risk Assessment (SFRA) - Climate change Addendum 2016 is currently the best available data to inform on flood risk to the district. However, additional modelling work is being undertaken for the River Trent from Willington to the M1 and also looking at possible remodelling the Hemington and Lockington Brooks. The outcome from these may require an update to the SFRA and be considered when looking at possible allocations.	Noted. This matter will be kept under review.

Geoffrey Brown, Charnwood Borough Council	In the light of the publication of the Draft NPPF it may be necessary to review the impact of the proposed new standardised methodology which will be included in the Government's new Planning Practice Guidance. The Draft NPPF also contains some important new guidance on viability which will need to be considered.	Noted. We acknowledge that the Local Plan review will need to fully comply with emerging Government planning policy, including the draft NPPF.
Chris Tandy	River Mease strategy for allocations post 2025 are required.	Noted. Discussions are ongoing with partners regarding the River Mease.
Louise Wells, Persimmon Homes North Midlands	Consideration of the Leicester & Leicestershire Strategic Growth Plan needs to be taken into consideration. In addition, evidence relating to employment land (such as the Assessment of Employment Sites study) and landscape needs to be updated. A way of remedying this would be to provide a SHELAA to assess new sites - including residential - which could be allocated to not only meet the identified need of employment sites, but also the residential sites that may be required to meet the needs of 2031-36.	The need to take account of the Strategic Growth Plan is recognised as is the need to update evidence relating to employment land. A new SHELAA was published earlier this year, and will be reviewed again later in 2018.
Mitzi Steven	Anything over 2 years due to local changes	We consider this to be too broad an approach as different subject matters will have different time sensitivities and lifespans.
Dawn Humpage	I think infrastructure needs to be addressed. In order to maintain a strong retail economy, parking and traffic flow needs to be addressed.	Noted. The infrastructure, retail and transport evidence bases will be updated as appropriate.
Karen Edwards, Ashby de la Zouch Town Council	<p>The Strategic Housing and Employment Land Availability Assessment (SHELAA) needs to accurately reflect current landownership and areas where Neighbourhood Plans are proposing Local Green Space designation.</p> <p>The Leicester to Burton Railway Study, 2016 needs to be revisited to reflect the increase in support for the reopening of the line and the impact of planned housing and employment developments.</p>	<p>Information in the SHELAA is based on information supplied by landowners.</p> <p>In terms of Neighbourhood Plans, it is a fact that these are required to be consistent with any Strategic Policies and its provisions do not override these Strategic Policies.</p> <p>The Leicester-Burton railway was the subject of a study in May 2016. It is considered that there has not been sufficient a change in circumstances at this time to warrant a further report, but the matter will be kept under review.</p>
Philippa Kreuser, CT Planning	The Settlement Fringe Assessment needs to be revisited as it is now 8 years on from publication and should take into account changes in landscape, housing allocations and permitted housing development. In addition, the scope of the Assessment should be expanded to include smaller	The need to update evidence regarding landscape character is recognised and is being commissioned.

	settlements in the District such as Donisthorpe which are sustainable and have the ability to accommodate and benefit from housing growth.	
Measham Parish Council	Any that are affected by Brexit and would no longer apply, would they be requested to become British law	Noted.
Barbara Lees	Re the housing proposed by the airport flight path H3d, concern is expressed regarding the impact of the aircraft on the proposed buildings and occupiers of the site.	Noted - however this point relates to an existing allocation in the adopted Local Plan. The suitability of this site was fully assessed before it was included in the Local Plan, and the inclusion of the site was subsequently found sound by the Local Plan Inspector.
Ian Webb, Ashby Civic Society	<ol style="list-style-type: none"> <li>1 Travel to Work areas as recommended by HEDNA.</li> <li>2 DATA bases that are over 5 years old.</li> </ol>	Noted. It is unclear which databases the respondent is referring to, but we will consider updating/replacing any evidence that is no longer considered up to date.
Ellie Jones , MPC	<p>HEDNA and Joint Statement of Cooperation. Since the North West Leicester Local Plan was prepared, the draft Leicester and Leicestershire Strategic Growth Plan has emerged. The Draft Strategic Growth Plan has indicated that Leicester City cannot deliver their required housing numbers to 2031. Beyond 2031 Oadby and Wigston are also unlikely to be able to deliver further housing growth. The Draft states that a 'Memorandum of Understanding' over how the housing need shortfall in Leicester City will be distributed between other areas will be prepared in early 2018 to be used as the basis for preparing or reviewing Local Plans. In light of this the distribution of housing identified in the HEDNA will need to be updated together with the Joint Statement of Cooperation.</p> <p>SHELAA - to provide the most up to date assessment of available economic and housing land.</p>	The need to take account of the Strategic Growth Plan is recognised. A new SHELAA was published earlier this year, and will be reviewed again later in 2018.
Philip Metcalfe, The National Forest Company	Guide for Developers and Planners likely to be updated in 2018.	Noted, the document can replace the existing supporting evidence when completed and will be taken into account if published prior to the relevant stage of the review.
Robert Duckworth, Duckworth Planning and Design Ltd	A sustainability review needs to occur as to what constitutes sustainability during the plan period; this is likely to change with store-to-door services and the prevalence of internet shopping, resulting in the ability to get to places on foot or by public transport less essential than previously considered.	In terms of the need for a sustainability review and extensions to development boundaries - see response to Duckworth Planning and Design's comments on Q2. The mix of housing to be provided is guided by evidence from the HEDNA.

	There needs to be greater variety in the housing market including smaller, adaptable homes and self-build opportunities which can only be provided through additional sites and proportionately extended development boundaries	
Rebecca Thompson, Wallace Land Investments	It is agreed that the Council's supporting evidence should be renewed and updated. This updating of evidence should be undertaken in the context of the Government's proposed changes to both the NPPF and NPPG including (but not exclusively) the standardised methodology for the calculation of OAHN, Green Belt Review, housing delivery test and viability assessment.	The need to take account of the Strategic Growth Plan and revisions to both the NPPF and NPPG is recognised.
Paul Watson, PRW Strategic Advice on behalf of IM Properties Ltd, Coleshill, Warwickshire	HEDNA (2017) needs to be updated and, importantly, extended to make good its current omission of strategic B8 development needs, demands & opportunities. The Leicester & Leicestershire Strategic Distribution Study (2014) also needs to be updated to cover evolving needs, demands & opportunities in a vital part of the local, regional & national economies.	The need for additional strategic B8 uses is identified in the HMA-wide Strategic Distribution study undertaken in 2014. This study was itself referenced in the HEDNA. An update of the Strategic B8 study was also published in 2016, and a further update is planned for later in the year.
Andrew Granger for Cadwallader Family	The quantum of the unmet housing needs will be formally established through the Strategic Growth Plan and the Memorandum of Understanding.	It is recognised that these will inform the preparation of the Local Plan Review. However, the standard methodology proposed by the government will also need to be considered when setting an updated housing requirement for the district.
Chris Lindley for Mr & Mrs Mansfield	A need to update deficient evidence on housing and economic development needs. It is vital to ensure that a robust evidence base is provided with regard to The River Mease SAC – through a thorough review of the Developer Contributions Scheme (DCS); Employment Land (representing a thorough review to the 2010 assessment, not simply the SHELAA); and Housing delivery – reflecting regular and rigorous monitoring of housing e.g. starts, completions, losses and the delivery of windfall sites.	The Council undertakes monitoring in respect of housing and this will continue and form part of the evidence base. The need to update evidence relating to employment land is recognised, whilst the Council continues to work with partners in relation to the River Mease.
ID Planning for Litton Properties	The draft Strategic Growth Plan will influence the review of the North West Leicestershire Local Plan, particularly in relation to the proposed Northern Gateway.	We would agree that it is important to take into account the work being undertaken at a sub-regional level on the Strategic Growth Plan when preparing the Local Plan review.
Historic England	The review presents a good opportunity to provide a more detailed evidence base in relation to heritage assets. The evidence base is critical to the preparation of a Local Plan in	Again, it is not clear as to how the evidence base should be strengthened. However, this matter will be explored further. The evidence base relating to heritage assets was not something that

	accordance with paragraph 169 and 10 of the NPPF and it is considered that the current evidence base should be strengthened to ensure a sound plan.	was raised as an issue by the Inspector at the Local Plan Examination.
Define for Bloor Homes	The Housing Need Evidence Base including the wider opportunities such as the Northern Gateway, assess the future needs of rural settlements for their needs including services and facilities and review the SHLAA providing robust justifications and viability assessments as needed.	Based on the Government's proposals, housing requirements are to be determined using the Standard Methodology. A new SHELAA was published earlier this year.
Define for Rosconn Strategic Developments	The Housing Need Evidence Base including the District and the wider HMA need, assess the future needs of rural settlements for their needs including services and facilities and review the SHLAA providing robust justifications and viability assessments as needed.	Based on the Government's proposals, housing requirements are to be determined using the Standard Methodology. A new SHELAA was published earlier this year.
East Midlands Airport	Economic evidence should include the Midlands Engine Prospectus together with the updated LLEP Strategic Economic Plan and Strategic Growth plan. Transport could include the East Midlands Airport Sustainable Development Plan (2015), DfT's Aviation Policy Framework (2103 currently being updated), Midlands Connect Strategy (March 2017) and the HS2 East Midlands Growth Strategy.	Agreed that the review should take account of the content of the strategies mentioned (many of which are currently in development) as the majority are of a strategic regional/sub-regional nature and provide a context for the more detailed local policies that could be contained within the Local Plan review.
Fisher German for Richborough Estates (Ashby de la Zouch)	It is considered that housing and economic development needs should be reviewed to ensure the Council is planning for the right amount of growth. The SHLAA should be regularly updated for the Council to understand the available sites there are in the District. The Settlement Fringe Assessment should be updated to reflect recent developments.	Although we are not proposing to update the HEDNA at the present time, we will continue to monitor our housing and economic development needs, particularly in light of the proposed standard methodology and Strategic Growth Plan work, to ensure that the reviewed local plan fully meets our identified needs. It is expected that a further iteration of the SHELAA will be published later in 2018. We are not proposing to undertake a settlement fringe assessment, although we will commission a new landscape character assessment.
Fisher German for Richborough Estates (Appleby Magna)	It is agreed that the Council's supporting evidence should be renewed and updated. In particular, it is considered that all components of the housing and economic evidence should be reviewed and updated.	Noted
Fisher German for Robert Botham	It is considered that housing and economic development needs should be reviewed to ensure the Council is planning for the right amount of growth. The SHLAA should be regularly updated for the Council to understand the available	Although we are not proposing to update the HEDNA at the present time, we will continue to monitor our housing and economic development needs, particularly in light of the proposed standard methodology and Strategic Growth Plan work, to ensure

	<p>sites there are in the District. The Settlement Fringe Assessment should be updated to reflect recent developments.</p>	<p>that the reviewed local plan fully meets our identified needs. It is expected that a further iteration of the SHELAA will be published later in 2018. The need to update evidence regarding landscape character is recognised and is being commissioned.</p>
<p>Gladman Developments Ltd</p>	<p>The Local Housing Needs Assessment in light of new national policy and proposed standardised methodology which could fundamentally change the scope of the review. The need to agree a Statement of Common Ground may also have an impact. Gladman agree that the Council will need to undertake a Sustainability Assessment (SA), Habitats Regulations Assessment (HRA) and Viability Study.</p>	<p>It recognised that the housing provision in the Local Plan will need to take account of the Standard Methodology and also any issues arising from the Statement of Common Ground/Duty to Cooperate.</p>
<p>GVA for Jelson Ltd and William Davis Ltd</p>	<p>The evidence on housing needs and delivery including: the introduction of a standard methodology; the housing delivery test; and affordable housing requirements. Evidence regarding Leicester's unmet housing needs. The Council's Local Growth Plan, Strategic Distribution study, Assessment of Employment Sites (2010), SHLAA and the Coalville Regeneration Strategy. The LEP's Economic Growth Plan may also have to be updated. The Settlement Fringe Assessment needs to remain up to date.</p>	<p>Noted</p>
<p>Home Builders Federation Ltd</p>	<p>It is agreed that the Council's supporting evidence should be renewed and updated. This updating of evidence should be undertaken in the context of the Government's proposed changes to both the NPPF and NPPG including the preparation of Statements of Common Ground, the standardised methodology for the calculation of objectively assessed housing needs (OAHN), Green Belt Review, the housing delivery test and whole plan viability assessment.</p>	<p>It recognised that the housing provision in the Local Plan will need to take account of the Standard Methodology and also any issues arising from the review of the NPPF/NPPG and the Statement of Common Ground/Duty to Cooperate.</p>
<p>Highways England</p>	<p>We consider that local plan reviews should be underpinned by an evidence base that includes an appropriate assessment of the transport impacts of future development proposals. This will be important as the Local Plan period is likely to be extended to 2036, with additional housing and employment coming forward. An appropriate transport evidence base will be critical in informing the review of policy on infrastructure requirements of new development proposals.</p>	<p>Noted. The transport evidence base will be updated as appropriate.</p>

Iceni Projects For Money Hill Consortium	The NWLDC employment evidence base at the site level is dated 2010. Consequently, it is strongly recommended that the supporting documentation be updated.	Agreed. It is our intention that the Employment Land study last completed in 2010 will be replaced by a new updated study.
DLP (Planning) Ltd for Langley Priory Estates	North West Leicestershire Local Growth Plan 2014 -2018 (Feb 2015) should be updated to include a key priority to support development in rural areas and encourage rural diversification, Leicester and Leicestershire Economic Partnership Economic Growth Plan 2014-2020 (Mar 2014) this remains relevant but should be updated due to the end date of the plan; and Assessment of Employment Sites – August 2010 (Aug 2010) this is now significantly out of date.	Work to update the Local Growth Plan is expected to commence later in the year. It is also our intention that the Employment Land study last completed in 2010 will be replaced by a new study.
Leicester City Council	The City Council recommends that a local Employment Land Study is undertaken to support the evidence base for the review of the plan.	Agreed. It is our intention that the Employment Land study last completed in 2010 will be replaced by a new updated study.
Planning and Design Group for Quarry Plant and Industry Ltd (Former Heather Brickworks)	Strategic housing and employment matters will need to be subject to a comprehensive re-assessment against the aspirations of the Strategic Growth Plan and emerging criteria of the NPPF. In particular the Strategic Housing Land Availability/Brownfield Land Assessment will require an annual update. A robust Statement of Common Ground will also be required which evidences how delivery and/or land shortfalls have been considered across Leicestershire and Leicester City.	Noted. The SHLAA and Brownfield land Register will be updated. It recognised that the review of the Local Plan will need to take account of the Standard Methodology and also any issues arising from the review of the NPPF/NPPG and the Statement of Common Ground/Duty to Cooperate.
Pegasus for Harworth Group (Lounge)	The Economic evidence will need to be reviewed to take account of new opportunities that may arise. The Local Plan Review will need to consider whether the HEDNA is fit for purpose for NWLDC, particularly in respect of the Strategic Economic Plan's (SEP) economic growth objectives. The HEDNA identifies a shortfall of 16ha of employment land to 2031. Clearly this shortfall will be higher should the Local Plan period be extended to 2036 as proposed, and could potentially be even greater in relation to the SEP's objectives.	Noted. A number of elements of the Economic evidence base are expected to be reviewed - including the Local Growth Plan, Employment Land Study and Strategic B8 study.
Pegasus for Harworth Group (Bardon)	The Economic evidence will need to be reviewed to take account of new opportunities that may arise. The Local Plan Review will need to consider whether the HEDNA is fit for purpose for NWLDC, particularly in respect of the Strategic Economic Plan's (SEP) economic growth objectives. The	Noted. A number of elements of the Economic evidence base are expected to be reviewed - including the Local Growth Plan, Employment Land Study and Strategic B8 study.

	HEDNA identifies a shortfall of 16ha of employment land to 2031. Clearly this shortfall will be higher should the Local Plan period be extended to 2036 as proposed, and could potentially be even greater in relation to the SEP's objectives.	
Pegasus for Davidsons Developments Ltd	As part of the review of the plan the supporting evidence set out at Appendix A of the consultation document should be renewed and updated. In particular this should include an update of the Strategic Housing and Economic Land Availability Assessment (SHELAA) in order to inform the updated housing and employment evidence base.	Noted. The evidence base documents will be reviewed to identify if and how they should be updated to inform the Local Plan Review. The Council has recently published its update of the SHELAA 2018, and this will be reviewed again later in 2018.
Pegasus for Hallam Land Management	<p>The evidence base underpinning the Coalville/Whitwick Area of Separation (Policy En5) should be reviewed.</p> <p>The Draft Ashby Neighbourhood Plan Areas of Separation should not simply be accepted and taken forward by the Local Plan. The Local Plan Review should therefore comprehensively review Areas of Separation across the district.</p>	<p>A review of the Area of Separation has been identified as a further piece of work to be undertaken.</p> <p>It is not the role of the Local Plan to review those matters contained in Neighbourhood Plans.</p>
Pegasus for Western Range Ltd	As part of the review of the Local Plan the supporting evidence set out at Appendix A of the consultation document should be renewed and updated. In particular this should include an update of the Strategic Housing and Economic Land Availability Assessment (SHELAA) in order to inform the updated housing and employment evidence base.	Noted. The evidence base documents will be reviewed to identify if and how they should be updated to inform the Local Plan Review. The Council has recently published its update of the SHELAA 2018, and this will be reviewed again later in 2018.
Planning Prospects for St Modwens Developments Ltd	It is essential that the Local Plan Review takes into consideration the Strategic Growth Plan which is expected to be produced towards the end of 2018. The Strategic Growth Plan proposals will have an impact upon the delivery of North West Leicestershire's Local Plan, especially in relation to employment and housing growth. Until the final Strategic Growth Plan is published, it is difficult to understand which Local Plan evidence will require review.	We would agree that it is important to take into account the work being undertaken at a sub-regional level on the Strategic Growth Plan when preparing the Local Plan review.
Redrow Homes East Midlands Ltd	The review of the existing evidence base will need to be undertaken having due regard to the emerging changes to the National Planning Policy Framework and the Planning Practice Guidance. In particular, the District Council will need to consider and reflect the changes concerning the duty to	Noted. The recently published Planning Practice Guidance sets out a standard methodology which it is proposed should be used instead of studies such as the HEDNA. If this is confirmed in the final publication later in 2018 then the implication of this will need to be taken in to account as part of the review.

	cooperate, viability and the new standard method for the calculation of local housing need.	
Tetlow King for Rentplus UK Ltd	The HEDNA should be reviewed to reflect the fuller definition of affordable housing now proposed by the Government, assessing the needs of each of those tenures across the District.	The methodology used in the HEDNA to identify the need for affordable housing is consistent with the recently published revisions to the NPPG. The type and amount of affordable housing will, however, need to be considered as part of the review.

### 3. (b) Are there any other evidence base studies which are required, and if so, why?

Respondent	Summary of Response	Reply
Ruth Mulvany 2	Property search registries show many more local people wish to self-build.	The Local Authorities fulfils its duty with respect to its responsibility for keeping a self-build and custom housebuilding register and the collection of the appropriate data. However we would be happy to also consider other reliable sources of information where this would be of benefit.
Lorna Measom	Seem comprehensive	Noted
David Bigby, Ashby Town Councillor	OPEN SPACE, SPORT AND RECREATION FACILITIES ASSESSMENT - This seems to have been overlooked in the evidence base for the current local plan and has not been reviewed by the District Council since 2008. Ashby Conservation Area Appraisal - this has not been properly reviewed since 2001.	Noted – we will be working on updating the evidence base in this area. Conservation Areas are reviewed separately to the local plan process.
Geoffrey Brown, Charnwood Borough Council	As mentioned previously Charnwood Borough Council is also progressing a new Local Plan and we would expect to have an ongoing and meaningful dialogue which be mutually beneficial for both our plans.	Noted. NWLDC is committed to working with the other authorities in Leicester and Leicestershire to bring forward both our individual Local Plans and the Strategic Growth Plan.
Chris Tandy	Highway capacity studies and impact analysis of allocations	The need for these will be reviewed when the scale of development requirements and possible allocations are clarified.
Louise Wells, Persimmon Homes North Midlands	One area which needs to be addressed in relation to the inspector's view is the area of separation. It is considered that it is not supported by evidence, nor have strategic reasonable alternatives been considered for the introduction of this designation. The council needs to consider to what extent of the previously defined Green Wedge area fulfils the function of separation, and as to whether any reasonable alternative exist, and	A review of the Area of Separation has been identified as a further piece of work to be undertaken.

	<p>subject those to Sustainability Appraisal and Strategic Environmental Assessment (SA/SEA). Previous evidence (The Settlement Fringe Assessment) acknowledges that the Green Wedge is not sacrosanct. It concluded that development south of the railway line which is the land promoted by Persimmon would be “easy to integrate without altering the character of the land or sense of separation”. This clearly identifies the areas as a potential option for development. Apart from the Green Wedge review, we deem that sufficient evidence is in place, but it is important that the evolving plan through the review reacts to new or updated evidence as it is provided.</p>	
Dawn Humpage	Preservation of historical architecture.	Policy He1 will be updated if appropriate.
Karen Edwards, Ashby de la Zouch Town Council	The Ashby de la Zouch Cycle Strategy needs to be included and updated to reflect the preferred route between Willesley Road and Hicks Lodge, rather than between Ridgway Road and Hicks Lodge.	The revised cycling strategy has been the subject of separate consultation and if approved will form part of the evidence base for the Local Plan.
Measham Parish Council	No	Noted
Barbara Lees	Pollution levels on the flight paths	It is considered that this is not required as part of the Local Plan review.
Philip Metcalfe, The National Forest Company	National Forest Company also working on 25 year vision for the Forest which may need to be reflected in emerging Local Plan.	Noted, the vision can be taken into consideration if published prior to the relevant stage of the review.
Paul Watson, PRW Strategic Advice on behalf of IM Properties Ltd, Coleshill, Warwickshire	The West Midlands Strategic Employment Sites Study (2015) should be acknowledged as an important part of the evidence base and its findings, conclusions & recommendations updated & reviewed with all relevant parties (see Q2 above).	At present, there are no specific employment needs arising from the West Midlands that have been brought to the Council’s attention, but the matter will be kept under review, and we will take into account any relevant new evidence.
Sport England	We would wish to raise our guidance on Active Design as part of the agenda to link health issues to planning. Sport England, in conjunction with Public Health England, has produced ‘Active Design’ (October 2015), the guidance sets out ten key principles for ensuring new developments incorporate opportunities for people to take part in sport and physical activity. The principles are aimed at promoting health communities through good urban design. The guidance could also aid the master planning process for new residential development.	As part of the review, consideration will be given to how the Local Plan should address health issues, and this guidance could inform this process.

Gladman Developments Ltd	Given the significant cross boundary issues across the Leicestershire HMA, it will be important that the evidence base prepared as part of the Strategic Growth Plan is also used to inform the preparation of the Local Plan Review.	Noted
GVA for Jelson Ltd and William Davis Ltd	Evidence which examines the role of the Area of Separation between Coalville and Whitwick and the boundaries of the designation. If the review process makes additional housing allocations, there needs to be robust evidence on its site selection methodology.	A review of the Area of Separation has been identified as a further piece of work to be undertaken.
Leicester City Council	There is no reference to a Playing Pitch Strategy or sports facility modelling within the evidence base. There are potential cross boundary implications for sporting provision, particularly in regard to cricket.	Work that has been undertaken on a Playing Pitch and Sports Facility Modelling since the publication of the Local Plan, will provide part of the evidence base for the Local Plan Review and will also inform this process.
Woodland Trust	Para 10.30 of your current local plan refers to the need to include woodland creation as part of new development. We would like you to consider our Access to Woodland Standard as a means of measuring the need for new woodland in a particular area. The standard aspires that everyone should have a wood of at least two hectares within 500 metres of their home and a larger wood of more than 20 hectares within 4 kilometres.	Local Plan Policy will continue to seek to improve woodland cover across the district as well as increasing tree cover within urban areas, all of which will complement the aspiration of the Woodland Trust.
Andy Yeomanson for LCC Highways	In respect of consultation Questions 2 (policies to be reviewed) and 3 (Evidence base) the County Highway Authority considers that it would be extremely beneficial if the new Local Plan could contain a specific text/policy in respect of lorry parking. Given the importance of road-based distribution and quarrying to the local economy; the volumes of (overnight) lorry parking that currently takes places at laybys in the district; and the lack of available off-highway lorry service facilities (a challenge understood to be faced by Highways England in seeking to upgrading the A42 to Express Way standard is the removal of laybys that are heavily used by parked HGVs (with no obvious place to displace them), it would seem appropriate for this matter to be afforded greater emphasis in the New Local Plan.	Any evidence to support this matter needs to be understood and considered along with issues relating to the deliverability of any possible allocation.