

## LOCAL PLAN REVIEW

### DEVELOPMENT STRATEGY OPTIONS AND POLICY OPTIONS - JANUARY TO MARCH 2022

#### SUMMARY OF RESPONSES TO Q26

**Q26 – What additional comments do you have about the Local Plan Review not covered by the preceding questions?**

#### 1. Consultation: arrangements and documents

Comments	NWL officer response
Even with the two-week extension the consultation period was not long enough.	The consultation period was originally planned for six weeks and a 2-week extension was agreed following a parish councils' request. The council's Statement of Community Involvement (SCI) confirms that the consultation period at this stage will be between 6 and 12 weeks. 6-8 weeks strikes a balance between allowing a reasonable time for people to respond to this initial document and maintaining progress with the overall Local Plan Review process. There will be at least one more Regulation 18 consultation before the more finalised 'publication'(Regulation 19) version is the subject of consultation.
The consultation needed greater publicity.	In line with the SCI, the letters, emails, press releases and the website were used to publicise the consultation in addition to social media posts. This is considered proportionate in view of the early-stage consultation and absence of specific site details at this stage.
There should be public meetings and other events in every parish.	Again, such events were not considered efficient and proportionate, particularly as this consultation did not provide detail on potential sites. Officers did attend a meeting arranged by Diseworth Parish Council prompted by the potential new settlement at Isley Walton.
The consultation document was difficult to access, understand and answer. As a result, the process was exclusionary. Local people need more assistance to understand what is being proposed.	There is a conflict between the level of technical detail demanded by development professionals and a more plain-English approach which includes less technical background. Writing for one audience can exclude the other. It is considered that what was published was appropriate and represented a balanced approach in view of the different audiences.
The local knowledge of residents and parish councils should be taken into	In coming to view on the Local Plan, the Council takes into account the views of local communities and also others with an interest

account in future decisions about the Local Plan Review.	in the development process such as statutory agencies, other local authorities and landowners and developers.
Responses to previous consultations have not been taken into account. There is a risk that the frequency of consultations and lack of resulting tangible benefits will lead residents to become disengaged and disillusioned with the entire process.	Previous responses have been reviewed and reported however the preparation of a Local Plan is an iterative process and each consultation stage may focus on different matters from the preceding stage. The risk of 'consultation fatigue' is something officers will take into account in the planning of future stages.

## 2. Additional issues not covered in the consultation document

Comments	NWL officer response
<b>1 - Housing</b>	
The Local Plan should be giving consideration to the components of housing supply such as an appropriate buffer coupled with rates of non-implementation across the District. Consideration should be given to reserve sites, particularly where there is heavy reliance on larger strategic sites. Future consultations should include a housing trajectory. Another respondent suggests that substitute plots could be identified as a fallback if developers fail to deliver units in a timely fashion.	Full details of planned housing supply, including the approach to reserve sites (if any) will be covered in a future consultation version of the new Local Plan. The inclusion of a 10% flexibility allowance was agreed at <a href="#">Local Plan Committee on 12 July 2022</a> .
The consultation document does not contain options around Gypsy and Traveller needs and how to address pitch supply issues.	Provision for Gypsies and Travellers will be addressed in a future consultation version of the new Local Plan.
There is a need to consider the implications of increased home/hybrid working and internet retail on the demand for office and retail premises and the consequent likely additional space available in town centres for residential use.	Agreed. Our <a href="#">Need for Employment Land study (2020)</a> considers the implications of changes in working practices and the <a href="#">Retail Study Update (2020)</a> identifies that online shopping is likely to grow faster than previously expected due to shifts in customer behaviour accelerated by the Covid-19 crisis. The Council will consider further what implications this has for the supply of housing land in the longer term.
More needs to be done to prevent medium and smaller developments from being below standard and missing opportunities to enhance their environment.	As a principle, it is agreed that small developments should not be exempt from high quality design and other standards. However, national policy makes some exemptions (for example affordable housing requirements do not apply to sites of fewer than 10 dwellings) which local policy cannot override. Also viability considerations can affect what can be achieved on smaller developments.

<p>The Local Plan should include a policy about meeting the housing needs of older people.</p> <ul style="list-style-type: none"> <li>• Such policies should encourage the delivery of specialist forms of accommodation for older people and not be criteria led.</li> <li>• Developers should not be required to demonstrate need given the many benefits that such developments bring and</li> <li>• if a quantum is specified this should be regarded as a target and not a ceiling.</li> <li>• the viability of specialist older persons' housing should be robustly assessed in the Local Plan Viability Assessment</li> </ul>	<p>Noted. This is a matter to be considered as part of a future Housing Mix policy or similar.</p>
<p><b>2 - Transport</b></p>	
<p>Lack of policies relating to transport, sustainable travel and reducing the need to travel by car. Development should be located in places where cycling and walking, including links to nearby facilities, is an attractive option.</p>	<p>The agreed Development Strategy seeks to direct development to the most sustainable settlements. Sustainable transport measures will be further addressed future consultation version of the new Local Plan when potential site allocations have identified and transport modelling is undertaken.</p>
<p>Lack of any monitoring proposals to demonstrate how the Plan is achieving its objectives e.g. to reduce the need to travel.</p>	<p>Agreed. A monitoring framework will be included in future consultation version of the new Local Plan.</p>
<p>The plan should explain role and importance of East Midlands Airport and support its growth.</p>	<p>Policies for EMA will be included in future consultation version of the new Local Plan.</p>
<p>All new homes and industrial premises should include facilities to encourage cycling (parking; storage) and walking. Permeable membranes should be used in parking spaces.</p>	<p>Transport matters, including sustainable transport will be addressed at a later stage in the plan's preparation.</p>
<p>Concern about the level of traffic going to and from East Midlands Hub.</p>	<p>Noted. Following transport modelling, the measures needed to address the additional traffic generated by future development will be included in the Infrastructure Delivery plan and/or the Local Plan itself.</p>
<p><b>3 - Environmental issues</b></p>	
<p>Concern about levels of air pollution around Diseworth from EMA.</p>	<p>Noted. Air quality will be one of the matters considered when assessing development proposals .</p>
<p>Greater regard should be given to environmental issues when planning new development. With the proposed changes to greener living and travel why are thousands of houses being built with yesterday's technology?</p>	<p>Housing standards and design principles are amongst the matters which will be covered at a future consultation stage, recognising that some aspects are dealt with by Building Regulations rather than the Planning system.</p>

Can more be done to encourage eco villages / green home communities? Possibly sharing a heat source?	
Save the Green Wedge	Noted.
The replacement for Policy S3 (Countryside) must protect local green spaces, areas of separation and valued landscapes informed by up-to-date landscape character assessment.	Landscape sensitivity evidence will inform the site selection process and an assessment of the Area of Separation has also been published. Neighbourhood Plans are a good vehicle for designating areas which are more locally important, including Local Green Spaces.
The operation of exiting renewable energy schemes should not be compromised by new development.	This matter is more likely to be considered at the level of an individual planning application, rather than requiring a specific policy in the new Local Plan.
<b>4 - Infrastructure</b>	
Policies for developer contributions must ensure that the developer meets the obligations before the development is completed.	The trigger points for developer contributions in S106 agreements must be clear and robust and the timing justified, whether this be before, during or after the development is completed.
New infrastructure is paramount; a) new doctors to service all our communities; b) new schools to accommodate new families coming into the area; and c) sufficient road capacity.	Agreed. The details of the infrastructure improvements needed to service the new development proposed will be set out in the Infrastructure Delivery Plan and will be the subject of separate discussion with the specific infrastructure providers.
Coalville town centre needs to be regenerated.	Noted. Regenerating Coalville is a priority for the council. The <a href="#">council's website</a> provides details of the improvements that are being planned.

### 3. responses from expert agencies

Comments	NWL officer response
<b>Inland Waterways Association</b>	
SHELAA site Oa7 includes the route of the Ashby Canal. Any site allocation boundary should either exclude the full original width of the canal, or it should be made clear that there should be no built development or services in the area and that the development will be expected to contribute financially (e.g. via S106 or CIL) to its restoration.	Noted. Proposed site allocations will be included in a future consultation.
<b>Natural England</b>	
The local plan policies should have regard for the River Mease SAC; the site, it's sensitivities, and actions which would improve its condition. The River Mease policy in the adopted local plan should be updated to reflect the current situation where DCS1/2 are no longer available, as well as any future plans for DCS3 or	Noted. The policy for the River Mease and the implications for future site allocations will be covered at a future consultation stage.

<p>alternative solutions. Whilst the pump out solution for the river is still anticipated, this will not cover the entirety of the catchment; alternative strategies for areas not benefitting from this should be explored. During the next steps in the Local Plan review, sites proposed for allocation should particularly consider the sensitivities of the River Mease.</p>	
<p>Biodiversity Net Gain will become mandatory in the coming years. We advise you to use the Biodiversity Metric 3.0 to implement development plan policies on biodiversity net gain. Any action, as a result of development, that creates or enhances habitat features can be measured using the metric and as a result count towards biodiversity net gain. The Chartered Institute of Ecology and Environmental Management has developed 'good practice principles' which can assist evidence gathering and developing policy.</p>	<p>Noted. The plan's approach to Biodiversity Net Gain will be covered at a future consultation stage.</p>
<p><b>National Highways</b></p>	
<p>The SA contains little detail regarding the extent to which forthcoming growth could be expected to impact upon the Strategic Road Network. NH supports the objectives in the SA that refer to increasing the use of public transport and other sustainable modes of transport.</p>	<p>Once the proposed site allocations have been selected, strategic transport modelling will be used to assess the impacts of future development on the strategic and local road networks and from there what mitigation will be required. This will also be subject to consultation with the respective highway authorities.</p>
<p><b>NHS East Leicestershire &amp; Rutland CCG (now the Integrated Care Board)</b></p>	
<p>The CCG's submission includes detailed information on how the existing GP practices in the district might be impacted by housing growth and which currently have unsuitable premises or insufficient space.</p>	<p>The team continues to collaborate with the ICB to understand the implications of the growth being planned in new Local Plan for primary care services. Improvements needed as a result will be set out in the Infrastructure Delivery Plan.</p>
<p><b>Environment Agency</b></p>	
<p>The EA underlines that the planning system should provide for climate change adaption as well as mitigation. Matters the new Local Plan should address include flood risk, water resources and quality, nature-based solutions to climate change and the protection of controlled waters.</p>	<p>The consultation proposes policies that aim to mitigate the impacts of climate change. Policies relating to climate change adaptation including flood risk and sustainable drainage systems will be covered at a future consultation stage.</p>
<p><b>Leicestershire Police</b></p>	
<p>The Council is requested to work with Leicestershire Police by consulting with them on large-scale applications, firstly to gain their perspective from a design front and secondly to understand whether the</p>	<p>The team will collaborate with Leicestershire Police to understand the implications of the growth being planned in new Local Plan for local policing. Improvements needed as a result will be set out in the Infrastructure Delivery Plan.</p>

associated growth would produce a need for additional policing infrastructure.	
<b>The Coal Authority</b>	
Confirms that there are recorded coal mining features present at surface and shallow depth within the North West Leicestershire area as well as surface coal resource.	Noted
<b>Canal &amp; River Trust</b>	
There are also active plans for the restoration of the Ashby Canal to extend it northwards towards its original terminus at Measham. To minimise the risk of future development prejudicing the restoration, the Plan should look to safeguard the route of the canal and existing Policy IF6 should be incorporated into the updated Local Plan.	Noted.

#### 4. responses from district and borough councils

Comments	NWL officer response
<b>Oadby &amp; Wigston BC</b>	
Welcomes references to the Strategic Growth Plan and to the Duty to Co-operate in the consultation document. Going forward, North West Leicestershire District Council must ensure that the evidence base is up to date, accurate and takes account of the latest strategic level evidence base, for example the Housing and Economic Needs Assessment.	Noted.
<b>Blaby DC</b>	
Support extending the plan period to 2039. This allows a 15-year time horizon and is consistent with other Local Planning Authorities' Local Plan reviews.	Noted

#### 5. Information about/support for a potential development site

There were 35 submissions which included information about and/or support for a proposed development site. This information will be considered by officers when recommending proposed site allocations to a future meeting of the Local Plan Committee.

#### 6. Objections to a potential development site

Seven responses objected to a specific SHELAA site or sites. Planning matters will be considered by officers when they recommend proposed site allocations to a future meeting of the Local Plan Committee.

A further 233 responses objected to potential development around Isley Walton (IW1) and to the north and east of Diseworth (EMP90) for the following reasons:

- a) Development of these sites would not comply with the NPPF.

- b) Development of these sites is in conflict with currently adopted Local Plan Policy and its objectives.
- c) The proposals would be out of character with the open countryside and farmland, detrimental to national food production and sustainable energy production.
- d) Would result in development in the countryside, outside of the defined Limits to Development.
- e) Development would not be in compliance with the settlement hierarchy of the Local Plan. Isley Walton is not even identified as a hamlet.
- f) An unsustainable location for development and brownfield sites should be used instead.
- g) Adverse impact on the quality of environment and residential amenity, adversely affecting people's quality of life, with adverse impacts such as light pollution, noise pollution, air pollution, loss of green space and loss of countryside views.
- h) Adverse impact on local ecology.
- i) Destruction of the character of Diseworth and its Conservation Area
- j) Adverse impact on the health and wellbeing of residents, undermining the rural setting of Diseworth and the loss of accessibility to the countryside.
- k) Proposals would not result in a high quality of design and layout given the scale and nature of developments proposed and the suggested provision of facilities such as a school, local centre and employment accommodation.
- l) Flooding issues are experienced in the area, and this would reduce the size of the developable area.
- m) Development in this location would increase the need to travel and the levels of commuting, particularly if the housing is to accommodate some of Leicester's housing need and given the lack of public transport infrastructure.
- n) Employment development will not generate sufficient demand to justify 4,700 homes leading to the creation of a dormitory town, and cars will have to be used to access services and facilities.
- o) Existing water management problems and flooding issues, including surface water run-off, will be exacerbated by such a large loss of open grassland and natural draining land being developed on.
- p) Loss of the area's local and distinctive character, and rural heritage, of rolling countryside and farmland.
- q) No protection or enhancement of the natural environment and its features, such as its species and wildlife and field's furrow features.
- r) Unacceptable location for new residential development due to the noise issues experienced in the locality, from existing land uses such as Donington Park Racing Circuit and the Airport, and also potentially from HS2 and the proposed employment use itself.
- s) Local road infrastructure, which already experiences high volumes of traffic, including freight, will not be able to cope with the additional traffic levels generated by the proposals. Consequential adverse impacts would include traffic congestion, higher road accident rates, unsuitable access off the A453 and rat running through Diseworth and Long Whatton.
- t) The locality has already experienced significant development (Rail Freight Interchange, Amazon, DHL Freight complex and the motorway services) and suffers the cumulative adverse environmental impacts alongside the loss of agricultural land eroding the character of the area and the intrinsic beauty of the countryside.
- u) Not sustainable to overbuild on much needed farmland. There is already a shortfall of agricultural land to fulfil national food and sustainable energy production. The war in

Ukraine has identified that we are overly dependent on imports of wheat from Russia and Ukraine.

- v) Unacceptable level of housing in one location when considered in the context of the level of housing that is needed across the whole of the district.
- w) There is no certainty that there will be demand for this number of houses, and the impact of covid may alter people's requirements in terms of property provision and design.
- x) Seeks reassurance that Diseworth will remain a Sustainable Village and its policy protection will not be diluted and that separation between the village and development would be provided.
- y) Site EMP90 does not satisfy Policy Ec2 as there is no evidence that there is an immediate need for additional employment land.
- z) Local facilities are already at capacity and cannot accommodate and increase in population.

## 7. Objections to development in general

Seven consultation responses objected to new development in general.

## 8. Other comments

Comments	NWL officer response
Agree with the 2039 end date to comply with NPPF.	Noted. Local Plan Committee has subsequently agreed to extend the plan period to 2040 to further ensure the new plan has a 15-year time horizon.
The existing Local Plan's policies are not being applied in Planning Committee decisions. Preparing a new Local Plan is a waste of money.	The preparation of a new Local Plan is necessary for a number of reasons, including a) planning law requires that planning applications must be determined in accordance with the relevant development plan policies unless material considerations indicate otherwise; and b) the National Planning Policy Framework emphasises that local plans should be kept up to date with reviews at least every 5 years.
When considering planning applications, the council should listen to local views and take note of possible issues instead of approving applications based on a precedent of bad decisions.	Issues raised local residents are one of a range of planning matters considered when an individual application is determined. Often a decision is a balanced one, weighing factors in favour or against the proposal, and this may or may not match local views.
Net Zero, in particular, is a myth. Without it, some sanity, reality and practicality could be brought to bear.	There is scientific consensus that climate change is occurring which makes measures such as Carbon Net Zero a necessity.