

## Appendix F: Leicester Forest East Neighbourhood Plan Regulation 14 Consultation Responses

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
1	General Comment	I have reviewed the Pre-Submission Version of the Leicester Forest East NHP - June 2018. The Plan does not encompass many environmental constraints that are within the remit of the Environment Agency and as such my comments are brief.	Environment Agency, Geoff Platts, Planning Specialist Sustainable Places, Trentside Offices	Noted.	None.
1	Page 23, Policy H2 Limits to Development	Limits to Development - within the 4 line of the Policy Blaby is spelt as Balby.		Noted.	Spelling of Blaby to be corrected.
1	Page 28, Policy H6 Housing Design	I welcome this Policy and specifically the reference to 'rain water harvesting'.		Noted.	None.
1	Page 36	The paragraph about LFE service station, the last sentence is unfinished and as such does not make sense. The paragraph reads 'On Christmas Eve 1997, Arthur Smith broadcast his Radio 4 show live from the services and its design' ??????.		Noted. Change to be made as proposed.	'... and its design' removed from final text.
1	Page 38, Policy ENV3	Biodiversity and Wildlife corridor is welcomed.		Noted.	None.

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1	Page 39, Policy ENV4	Sites of high environmental significance is welcomed.		Noted.	None.
2	General Comment		Stuart Coar, Blaby District Councillor	Thank you for making comment.	
2		You state that there is an annual Gala, there wasn't last year.		The reference to the annual gala will be changed to 'a regularly held gala'.	Amendment as proposed.
2		You state that there is a butchers shop, there isn't and hasn't been for the last 12 months.		Reference to the butchers has been removed.	Reference to the butcher removed.
2		The Doctor's Surgery states Park Drive may increase and Warren Lane won't?  Surely this is the wrong way around. There is an application in for the extension of Warren Lane. I'm not convinced your wildlife corridor is correct - I will check and get back to you.		Noted. No further communication received.	Amendment to be made.
3	General Comment	Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.	Natural England, Alice Watson, Consultations Team, Crewe	Noted.	None.

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3		Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.			
3		<b>Natural England does not have any specific comments on this draft neighbourhood plan.</b> However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.			
3		For further consultations on your plan please contact: <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a> .			
4	General Comments	Braunstone Town Council's Planning and Environment Committee (which took place on 8 November) received the Leicester Forest East Draft Neighbourhood Plan and determined whether to make representations as a stakeholder to the Statutory Consultation.  It was resolved that the following response be submitted to the statutory consultation on the Leicester Forest East Draft Neighbourhood Plan:	Braunstone Town Council, Darren Tilley, Executive Officer, Town Clerk and Responsible Financial Officer	Noted.	None.

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4		The draft policies, particularly concerning Housing and Transport be supported as the draft plan was very thorough and the policies covered the relevant areas, particularly Housing and Transport, which continue to have a significant impact on the area.			
4		The description of the Leicester Forest East Motorway Services be reviewed for accuracy and amended as appropriate. It was understood that the five service stations on the first section of the M1 opened prior to Leicester Forest East Services, however, Leicester Forest East Services was the first services with a bridge connecting the two sites featuring a restaurant.		Agreed - LFE Services were not the first on the M1 but part of Phase 2 (1966). The reference to Markfield will be removed as not pertinent.	Amendment to be made as indicated.
5	General Comments	Leicester City Council has welcomed the main modification to Blaby's Delivery DPD which introduces new Policy LPR1 (Local Plan Review) to deal with the Strategic Growth Plan, changes within the Leicester and Leicestershire Housing Market Area and any future shortfalls in delivery within the district.	Leicester City Council, Grant Butterworth, Head of Planning		
5	Policy H2 Limits to Development	Leicester City Council would wish to see flexibility similarly built into proposed Policy H2 (Limits to Development) and the reasoned justification thereto, for consistency with Blaby's Delivery DPD and to ensure that the Parish's Neighbourhood Plan can respond to any change in the circumstances over the plan period.		This is not an appropriate policy for a neighbourhood plan — there will be a review of the NP should housing need change over the Plan period.	

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5		<p>Leicester City Council as a Highway Authority has the following comments:</p> <p>(a) We welcome that the plan is supportive of new development taking place in sustainable locations. The document highlights existing and future measures to encourage sustainable transport, such as encouraging the inclusion of electric vehicle charging points into the design specification of new homes, designating cycle routes as part of new developments and highlighting that residents can benefit from the Meynell's Gorse Park and Ride site which operates a good quality bus service into the city centre. We would also encourage that new cycle routes are connected to existing cycle routes</p>		Yes, this change will be made.	Amendment to be made as indicated.
5		<p>(b) We are pleased to see that policies are positive towards sustainable travel to the city centre and seeks that any cumulative residual impact on traffic flows from new developments will not be severe. In addition that the Plan is striving for improvements in air quality, which supports the City Council's Air Quality Action Plan (2015-2026).</p>		Noted.	None.

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5		(c) The Plan is geographically within Leicester County Council and borders with City's strategic road network at the A47 Hinckley Road and 85380 Ratby Lane. The Plan also refers to a section of the M1 motorway which is strategically important to both City and County Highway Authorities. Leicester Highway Authority would seek co-operation from the Parish Council, such that their role as a statutory consultee contributes in a positive manner in respect of City aspirations and forward plans regarding highways and transport.		Noted.	None.
5		(d) As well as recognising the importance of the city highway network (A47, A5460) Ratby Lane should also be included within this.		Agreed. This will be added.	Amendment to be made as indicated.

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5		<p>(e) The document states that bus travel within the area is unreliable due to traffic volumes on the A47 There are already a number of inbound and outbound bus lanes in existence on the A47 which help improve both the journey times and reliability of bus services, including the Park and Ride. Known pinch points such as Braunstone X-roads will benefit from proposals associated with New Lubbethorpe. In addition, we are considering additional enforcement cameras to protect the benefits from existing bus lanes. More generally, we do work closely with local bus companies and will be seeking to exploit increased partnership opportunities under the Bus Services Act 2017 with the aim of continually improving the public transport network.</p>		Noted.	None.

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5		(f) The document also states that taxi journey times have also increased. As an example, it uses Leicester Railway Station as a destination suggesting journey times have increased from 20 minutes to 40 minutes due to traffic restrictions in the city. The City Council has not applied any measures to restrict traffic on the A47. Our evidence suggests that that there has been no significant reduction in peak period journey speeds over the last five years and certainly not by 50%. In a busy urban environment, peak period journey times are inevitably longer than off-peak and likely to be more variable. However, a 40 minute journey time would be at the extreme end of potential journey times. Hackney cabs can, of course, minimise delays and increase journey time reliability by legally using the city's bus lanes, including those on the A47 corridor.		Thank you for this comment. We will amend the text to state '20 minutes can increase to up to 40 minutes at peak times' and remove the reference to traffic restrictions.	Amendment to be made as indicated.
5		(g) Regarding bus tickets LFE falls within a 'Flexi- ticket' zone meaning that residents can already purchase tickets which permit travel on any bus in the zone.		Noted. This refers to a Community Action.	None.



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5	Policy ENV3	(h) Regarding Policy ENV3, this designates land adjacent to the M1 and LFE Services as a 'wildlife corridor' and states that 'development proposals should not damage or adversely affect the wildlife corridor'. A sustainable travel link to the A47 via Baines Lane is planned as part of the New Lubbesthorpe SUE travel infrastructure. this will pass directly through the middle of this wildlife corridor. We would therefore ask how the proposed policy relates to the existing planning permissions and various conditions/5106 obligations etc. for Lubbesthorpe.		This apparently refers to the proposed 'Bus Priority Link Baines Lane' shown in Drawing 208133/70 in Planning Statement for New Lubbesthorpe, David Lock Associates, 2011. The proposals details may now be subject to alteration by the planned conversion of the M1 here to SMART motorway. However the principle function of a wildlife corridor is to provide potential or actual connectivity of existing or planned wildlife habitats (e.g. LFE Spinney, public open space, flood retention areas, proposed green corridor at north boundary of New Lubbesthorpe. It can be assumed that the landscaping of the sustainable travel link (which will follow the course of the present Baines Lane service road between the east and west sides of LFE services) can be designed to maintain this connectivity.	

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5	Policy ENV2 and CF1	<p>Finally, it is a concern that the Leicester Forest East M1 Motorway Service Station is noted as a Building or Structure of Local Significance and a Community Facility/Amenity. We believe this may conflict with Highways England's Plans to upgrade the M1 between junctions 19 and 23A to a SMART motorway. We would like to understand if and to what extent this has been considered when including the Leicester Forest East Motorway Service Station in both ENV2 and CF1 policies.</p> <p>The above comments have been informed by discussions with Leicestershire County Council as the neighbouring highway authority and with regard to cross-boundary transport matters.</p>		<p>Noted — but it has not been raised as a concern by Highways England so it is intended to retain the designation.</p> <p>Notification of the NDHA status of LFE services will be taken into account by Highways England when proposals for redevelopment of the M1 as a SMART motorway come forward. The rationale for proposing NDHA status is valid as a matter of historical fact and the acknowledged architectural significance of the structures.</p>	Reference to be made to the need to designate the wildlife corridor with reference to the proposed bus route.
6	General Comments	We welcome the opportunity to comment on the Pre-submission version of the Draft Leicester Forest East Neighbourhood Plan which covers the period 2006-2029. It is noted that the document provides a vision for the future of the area and sets out a number of key objectives and planning policies which will be used to help determine planning applications.	Highways England, A. Chadha, Spatial Planning and Economic Development Team		

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6		<p>Highways England has been appointed by the Secretary of State for Transport as a strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Leicester Forest East Neighbourhood Plan, our principal interest is in safeguarding the operation of the M1 which routes through the Plan area and the A46 and M69 which route 1 mile north and 1 mile south of the Plan area respectively.</p>		Noted.	
6		<p>We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for the parish of Leicester Forest East is required to be in conformity with the adopted Blaby Local Plan Core Strategy (2009-2029) and the emerging Blaby Deliver Development Plan Document (2009-2029) which is currently in its early stages of review and this is acknowledged within the document.</p>			

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6		We note that Leicester Forest East is identified as part of the 'Principal Urban Area' in the Core Strategy and therefore has been allocated a proportionate scale of development growth. It is noted that a specific housing target for the Parish of Leicester Forest East has not been set out in the Blaby Local Plan Documents. However, within the Blaby Delivery Development Plan Document land has been allocated to accommodate a minimum of 76 dwellings. It is proposed that 55 homes will be built at a site at Grange Farm and 21 homes are allocated on land adjacent to Webb Close.		Noted.	None.
6		Considering the limited level of growth proposed across the Neighbourhood Plan area we do not expect that there will be any impacts on the operation of the SRN.		Noted.	None.
6	Policy ENV2 Local Heritage Assets of Historical and Architectural Interest	Within the consultation document list Leicester Forest East Motorway Services as a 'non-designated heritage asset', based on guidance from Historic England. This is defined as buildings or structures in the built environment which are considered to be of high local significance for architectural, historic or social reasons. The services have been described as 'Leicestershire's best-known landmark' in the local press and were the first services to open on the M1.			

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6		It should be noted that Highways England are currently in the process of identifying options for the potential implementation of Smart Motorway along the M1 between J19 and 23a which may have some impacts upon the operation Leicester Forest East's Motorway Services. Implementation is still at an early stage. However, we will work with the Council and relevant partners, including Historic England to ensure that the historic interest of the services is maintained.		Noted - this acknowledgement is welcomed.	None.
6		We have no further comments to provide and trust that the above is useful in the progression of the Leicester Forest East Neighbourhood Plan.			
7	General Comment	National Grid has appointed wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan Consultation.	National Grid Wood, Hannah Lorna Bevins, Consultant Town Planner	Noted.	None.

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7		<p><b>About National Grid</b></p> <p>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customer. National Grid own four of the UK's gas distribution networks and transports gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p>			
7		To help ensure the continued safe operation of existing sites and equipment and to facilitate future plans and strategies which may affect our assets.			
7		<p><b>Assets in your area</b></p> <p>National Grid has identified the following high voltage overhead powerline as falling within the Neighbourhood area boundary:</p>			
7		<b>4YZ Route - 400kV from Enderby substation in Blaby to Ratcliffe on Soar substation in Rushcliffe.</b>			

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7		From the consultation information provided, the above overhead powerline does not interact with any of the proposed development sites.			
7		<p><b>Gas Distribution - Low/Medium Pressure</b></p> <p>Whilst there are no implications for National Grid Gas Distribution's Intermediate/High Pressure apparatus, there may however be Low Pressure (LP)/Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network please contact <a href="mailto:plantprotection@cadentgas.com">plantprotection@cadentgas.com</a></p>			
7		<p><b>Electricity Distribution</b></p> <p>Information regarding the distribution network can be found at <a href="http://www.energynetworks.org.uk">www.energynetworks.org.uk</a></p>			
7		<p><b>Key resources/contacts</b></p> <p>National Grid has provided information in relation to electricity and transmission assets via the following internet link:</p> <p><a href="http://2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/">http://2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</a></p>			

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7		<p>Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details as shown below to your consultation database.</p> <p>Hannah Lorna Bevins, Consultant Town Planner n.grid@amecfw.com</p> <p>Wood E&amp;I Solutions UK Ltd Gables House, Kenilworth Road, Leamington Spa, Warwickshire CV32 6JX</p> <p>Spencer Jefferies, Development Liaison Officer, National Grid box.landacquisitions@nationalgrid.com</p> <p>National Grid House Warwick Technology Park Gallows Hill, Warwick CV34 6DA</p>			
8	Highways Specific Comments Traffic and Signals Team	<p>Community Action T2-LCC would have to establish if there is an actual speeding problem through speed survey data. Only if this data supports the need to slow vehicles down would LCC support the use of traffic calming. The parish must be fully aware of the costs (~£15K per traffic calming measure) and that they are installed via the correct legislation. LCC could support this provided no detrimental effects to the existing highway, such as the loss of on-street parking.</p>	<p>Leicestershire County Council, Nik Green (Mrs), Policy Officer neighbourhoodplanning@leics.gov.uk</p>	<p>Noted. This is a Community Action and therefore subject to negotiation.</p>	



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8		Community Action T3-Junctions are assessed when there are major changes to the network and or when a corridor is reviewed. Yellow box markings are reluctantly used, unless there is effective enforcement they often become abused. At this time only Leicestershire police have the authority to enforce this restriction.			
8	Transport Strategy and Policy Team	The comments below have been informed by discussions with Leicester City Council as the neighbouring highway authority and with regard to cross-boundary transport matters.			
8	5.1.13 Housing Allocations, Page 19	With regards to the Grange Farm (55dw) allocation site, the text states that the Local Highway Authority's preference is for access to be provided via Warden's Walk - to clarify, the LHA does not have an official position in respect of access to/from the site (notwithstanding any comments made as part of the initial screening/ SHLAA assessment for the site) and would expect all access options to be considered as part of a future planning application. The LHA will consider any specific proposals in accordance with the requirements and standards set out within the Leicestershire Highway Design Guide.		Noted - we will remove this specific reference.	Amendment to be made as stated.
8	Policy H6: Housing Design (Page 27)	Currently refers to parking standards in the 6Cs Design Guide. This should be updated to reflect that Leicestershire County Council are no longer using the 6Cs Design Guide and have replaced this with the Leicestershire Highway Design Guide.		Noted - the reference will be changed.	

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8	Policy ENV2 Local Heritage Assets (Page 35)	With regards to the proposed designation of Leicester Forest East Motorway Service Area as 'a building of local historic or architectural interest' under policy ENV2, we note that there are future proposals by Highways England to upgrade the M1 between junctions 19 and 23A to 'Smart Motorway', although the potential impacts of these proposals on Leicester Forest East Services are currently unclear. How has this been taken into account in developing policy ENV2 and the decision to include the motorway services within the remit of the policy?		Noted - however Highways England has not expressed concern.	None.
8	Policy ENV3 Biodiversity and Wildlife Corridor (Page 37)	We note that the proposed wildlife corridor set out in Figure 7 coincides with the route of the sustainable travel link through to the A47 (via Baines Lane), which is committed to be delivered as part of the transport infrastructure for the Lubbethorpe Sustainable Urban Extension. With this in mind, has the consideration been given as to how proposed policy ENV3 would relate to/interact with the existing planning permissions and various conditions/obligations associated with this for Lubbethorpe SUE? Additionally, given much of the proposed wildlife corridor is directly adjacent to the M1, has consideration been given as to how the policy might relate to Highways England's smart motorway proposals?		The Wildlife Corridor will still apply with the proposed bus route.	None.

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8	Policy ENV4 Sites of Environmental Significance (Page 38)	Noting the proposed designation of Leicester Forest East Spinney and that it is adjacent to the M1, has consideration been given as to how the policy might relate to Highways England's smart motorway proposals?		Proximity of the M1 to LFE has no adverse affect on its Biodiversity (semi-mature woodland, suite of urban/ Sub-urban woodland birds). It could be argued that the Location of a piece of 'tranquil' woodland so close to the Motorway enhances its value to and appreciation by the Local community. Conversion to a SMART motorway is Carried out within the present carriageway plus hard Shoulder footprint, the west side of the M1 here is Separated from the spinney by an additional 30m of Embankment and hedgerow. We will add in 'with Appropriate mitigation'.	

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8	Policy CF1: The Retention of Community Facilities and Amenities (Page 42)	With regards to the proposed designation of Leicester Forest East Motorway Service Area as an existing community facility' under policy CF1, we would again refer to Highways England's proposals to introduce smart motorway along the M1 and th potential implications for the Motorway Service Area. How has this been taken into account in developing policy CF1 and the decision to include the motorway services within the remit of this policy? Additionally, it would also be useful to understand what evidence has been collated to demonstrate that the Motorway Services form a local community facility/amenity in this context?		The designation is proposed because of its historical significance.	
8	Community Action CFA 4: Trees Lining A47 (Page 44)	We assume this will take into account the existing planning permissions and any relevant conditions/obligations associated with the Lubbethorpe SUE, as well as future requirements for the additional sites allocated through the Local Plan DPD?		It is a community action not a policy, therefore it will take this into account.	
8	Section 5.5: Transport (Page onwards) General Comment	We note that this section of the report refers to a number of existing traffic and transport issues, in relation to which it would be useful to have an understanding of the evidence that has been collated to underpin the specific points raised (e.g. with regards to the bus and taxi service delays).		This section will be amended as indicated earlier.	

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8	Within 5.5.1:	The effect of traffic increasing it states that 'there no train service from Leicester Forest East despite plans to have a Nottingham to Leicester line running on the existing tracks)' of which the underlined section is factually incorrect.		The reference to the planned service will be removed.	
8	Within 5.5.3: Parking and Traff Congestion (Page 51)	It states that 'The 2 off road parking space policy is inadequate and should be increased wherever possible'. In relation to this point we would clarify that LHA has to consider parking requirements for development proposals on a case-by-case basis in accordance with the National Planning Policy Framework and the parking standards set out in the Leicestershire Highway Design Guide.		Noted - this will be taken into account when a planning application is submitted.	
8	Within 5.5.5: Traffic Calming (Page 51)	It states that 'Highway design on any new large scale developments should incorporate adequate provision for bus to pull into lay-by (sic) to ensure traffic flows are not impeded by stationary vehicle and provided with passenger shelters and real time bus information signage'. In relation to this point we would clarify that the LHA has to consider bus stop infrastructure requirements for development proposals on a case-by-case basis taking into account site-specific issues and needs, in accordance with the National Planning Policy Framework and the relevant standards set out in the Leicestershire Highways Design Guide.		As above.	

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8	General Comments	The County Council recognises that residents may have concerns about traffic conditions in their local area, which they may feel may be exacerbated by increased traffic due to population, economic and development growth.		Noted.	None.
8		Like very many local authorities, the County Council's budgets are under severe pressure. It must therefore prioritise where it focuses its reducing resources and increasingly limited funds. In practice, this means that the County Highway Authority (CHA), in general, prioritises its resources on measures that deliver the greatest benefit to Leicestershire's residents, businesses and road users in terms of road safety, network management and maintenance. Given this, it is likely that highway measures associated with any new development would need to be <b>fully</b> funded from third party funding, such as via Section 278 or 106 (S106) developer contributions. I should emphasise that the CHA is generally no longer in a position to accept any financial risk relating to/make good any possible shortfall in developer funding.			

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8		To be eligible for S106 contributions proposals must fulfil various legal criteria. Measures must also directly mitigate the impact of the development e.g. they should ensure that the development does not make the existing highway conditions any worse if considered to have a severe residual impact. They cannot unfortunately be sought to address existing problems.			
8		Where potential S106 measures would require future maintenance, which would be paid for from the County Council's funds, the measures would also need to be assessed against the County Council's other priorities and as such may not be maintained by the County Council or will require maintenance funding to be provided as a commuted sum.			
8		With regard to public transport, securing S106 contributions for public transport services will normally focus on larger developments, where there is a more realistic prospect of services being commercially viable once the contributions have stopped i.e. they would be able to operate without being supported from public funding.			

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8		The current financial climate means that CHA has extremely limited funding available to undertake minor highway improvements. Where there may be the prospect of third party funding to deliver a scheme, the County Council will still normally expect the scheme to comply with prevailing relevant national and local policies and guidance, both in terms of its justification and its design, the Council will also expect future maintenance costs to be covered by the third party funding. Where any measures are proposed that would affect speed limits, on-street parking restrictions or other Traffic Regulation Orders (be that to address existing problems or in connection with a development proposal), their implementation would be subject to available resources, the availability of full funding and the satisfactory completion of all necessary Statutory Procedures.			
8	Flood Risk Management Specific Comments 5.1.1. Introduction (Page 18)	There is no need to mitigate the potential of flood risk to new and existing properties that new development might bring.' The LLFA welcomes the inclusion of this statement. As part of the LLFA's strategy, no development should increase flood risk - flood risk should be mitigated (where possible).		The policy says 'there is a need' (not no need ...). Comment welcome.	



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8	5.1.3, Housing Allocations	The proposed Local Plan (Delivery) DPD allocation of 55 unites (including 13 affordable units) at Grange Farm is supported by the Neighbourhood Plan as it scored highly in the site assessment undertaken as part of the process of preparing this Neighbourhood Plan'.			
8		The LLFA confirms that drainage is an important feature for this application. The LLFA would like to reiterate its statutory consultee function with regard to planning applications. Leicestershire County Council, as the LLFA, are consulted on any major planning applications, and will also comment on minor applications that are deemed in a flood risk area. It is therefore essential that any planning application properly mitigates flood risk with an appropriate surface water drainage strategy, incorporating Sustainable drainage Systems (where possible), adheres to Approved Document H - Surface Water drainage hierarchy where possible and the national planning policy framework. Please refer to our 'Surface water drainage for developments' website for guidance.		Noted.	None.
8	Policy H1: Residential Site Allocations: 2)	A sustainable urban drainage system (SUDS) is provided by supporting evidence and the LLFA.		Noted. A reference to the NPPF will be made.	
8		The LLFA would also like to refer to the national planning policy framework (165). As stated in the NPPF (165):			

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8		Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:			
8		a) Take account of advice from the lead local flood authority.			
8		b) Have appropriate proposed minimum operational standards.			
8		c) Have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development, and			
8		d) Where possible, provide multifunctional benefits.			
8		The LLFA supports the use of SuDS in all development (where possible) and advises planning applications to adhere to the national planning policy framework and advises planning applications to adhere to the national planning policy framework.			
8	5.1.7 Housing Design	The installation of a rain water harvester within the curtilage of each new dwelling would significantly reduce the amount of rain water going into existing water courses, but also on the amount of water available for flushing house toilets or washing cars.'			

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8		The LLFA supports the use of SuDS (including but not limited to rain water harvesting) in all development (where possible) and advises planning applications to adhere to the national planning policy framework.		Noted - the policy will be widened as proposed.	
8	5.2.6 Biodiversity	The LLFA supports the protection of the flood basin (as a site of high environmental significance) due to their flood alleviation benefits.		Noted.	None.
8	General Comments	The County Council are fully aware of flooding that has occurred within Leicestershire and its impact on residential properties resulting in concerns relating to new developments. LCC in our role as the Lead Local Flood Authority (LLFA) undertake investigations into flooding, review consent applications to undertake works on ordinary watercourses and carry out enforcement where lack of maintenance or unconsented works has resulted in a flood risk. In April 2015 the LLFA also became a statutory consultee on major planning applications in relation to surface water drainage and have a duty to review planning applications to ensure that the onsite drainage systems are designed in accordance with current legislation and guidance. The LLFA also ensure that flood risk to the site is accounted for when designing a drainage solution.		Noted.	None.

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8		<p>The LLFA is not able to:</p> <ul style="list-style-type: none"> <li>* Prevent development where development sites are at a low risk of flooding or can demonstrate appropriate flood risk mitigation.</li> <li>*Use existing flood risk to adjacent land to prevent development.</li> <li>* Require development to resolve existing flood risk.</li> </ul>		Noted.	None.
8		<p>When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points:</p> <ul style="list-style-type: none"> <li>* Locating development outside of river (fluvial) flood risk (Flood Map for Planning Rivers and Sea).</li> <li>* Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map).</li> </ul>		<p>There are no 'NP only' allocations given the extent of housing development in the Parish over recent years.</p> <p>Noted - we will say within the design policy, H6, that design should reflect best environmental practice but not be limited to the examples given.</p>	
8		<ul style="list-style-type: none"> <li>* Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding.</li> </ul>			
8		<ul style="list-style-type: none"> <li>* How potential SuDS features may be incorporated into the development to enhance the local amenity, water quality and biodiversity of the site as well as manage surface water runoff.</li> </ul>			

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
8		* Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk.			
8		All development will be required to restrict the discharge and retain surface water on site in line with current government policies. This should be undertaken through the use of Sustainable Drainage Systems (SuDS). Appropriate space allocation for SuDS features should be included within development sites when considering the housing density to ensure that the potential site will not limit the ability for good SuDS design to be carried out. Consideration should also be given to blue green corridors and how they could be used to improve the bio-diversity and amenity of new developments, including benefits to surrounding areas.			
8		Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing watercourses and land drainage (including watercourses that form the site boundary) are retained as open features along their original flow path, and are retained in public open space to ensure that access for maintenance can be achieved. This should also be considered when looking at housing densities within the plan to ensure that these features can be retained.			

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
8		LCC, in its role as LLFA will not support proposals contrary to LCC policies.			
8		For further information it is suggested reference is made to the National Planning Policy Framework (March 2012). Sustainable drainage systems: Written statement - HCWS161 (December 2014) and the Planning Practice Guidance webpage.			
8		Flood risk mapping is readily available for public use at the links below. The LLFA also holds information relating to historic flooding within Leicestershire that can be used to inform development proposals.			
8		Risk of flooding from surface water map: <a href="https://flood-warning-information.service.gov.uk/long-term-flood-risk/map">https://flood-warning-information.service.gov.uk/long-term-flood-risk/map</a>			

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
8	Planning Developer Contributors	<p>Flood map for planning (rivers and sea):  <a href="https://flood-map-for-planning.service.gov.uk">https://flood-map-for-planning.service.gov.uk</a></p> <p>If there is no specific policy on Section 106 developer contributions/planning obligations within the draft Neighbourhood Plan, it would be prudent to consider the inclusion of developer contributions/planning obligations policy, along similar lines to those shown for example in the Draft North Kilworth NP and the draft Great Glen NP albeit adapted to the circumstances of your community. This would in general be consistent with the relevant District Council's local plan or its policy on planning obligations in order to mitigate the impacts of new development and enable appropriate local infrastructure and service provision in accordance with the relevant legislation and regulations, where applicable.</p>			
8		<p><a href="http://www.northkilworth.com/wp-content/uploads/2016/01/nk-draft-low-resolution-1/pdf">www.northkilworth.com/wp-content/uploads/2016/01/nk-draft-low-resolution-1/pdf</a></p> <p><a href="http://www.harborough.gov.uk/downloads/file/3599/great.glen_referendum_version_2pdf">http://www.harborough.gov.uk/downloads/file/3599/great.glen_referendum_version_2pdf</a></p>			
8	Mineral and Waste Planning	The County Council is the Minerals and Waste Planning Authority, this means the council prepares the planning policy for minerals and waste development and also makes decisions on mineral and waste development.		Noted.	None.

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
8		Although neighbourhood plans cannot include policies that cover minerals and waste development it may be the case that your neighbourhood contains an existing or planned minerals or waste site. The County Council can provide information on these operations or any future development planned for your neighbourhood.			
8		You should also be aware of Mineral Consultation Areas, contained within the adopted Minerals Local Plan and Mineral and Waste Safeguarding proposed in the new Leicestershire Minerals and Waste Plan. These proposed safeguarding areas and existing Mineral Consultation Areas are there to ensure that non-waste and non-minerals development takes place in a way that does not negatively affect mineral resources or waste operations. The County Council can provide guidance on this if your neighbourhood plan is allocating development in these areas or if any proposed neighbourhood plan policies may impact on minerals and waste provision.			
8	Education	Whereby housing allocations or preferred housing developments form part of a Neighbourhood Plan the Local Authority will look to the availability of school places with a two mile (primary) and three mile (secondary) distance from the development. If there are not sufficient places then a claim for Section 106 funding will be requested to provide those places.		These general comment are noted.	



Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
8		It is recognised that it may not always be possible or appropriate to extend a local school to meet the needs of a development, or the size of a development would yield a new school. However, in the changing educational landscape, the Council retains a statutory duty to ensure that sufficient places are available in good schools within its area for every child of school age whose parents wish them to have one.			
8	Property Strategic Property Services	No comment at this time.			
8	Adult Social Care	It is suggested that reference is made to recognising a significant growth in the older population and that the development seeks to include bungalows etc of differing tenures to accommodate the increase. This would be in line with the draft Adult Social Care Accommodation Strategy for older people which promotes that people should plan ahead for their later life, including considering downsizing, but recognising that people's choices are often limited to lack of suitable local options.		Prioritising accommodation suitable for older people is contained in policy H3.	

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
8	Environment	With regard to the environment and in line with the Governments advice, Leicestershire County Council (LCC) would like to see Neighbourhood Plans cover all aspects of the natural environment including climate change, the landscape, biodiversity, ecosystems, green infrastructure as well as soils, brownfield sites and agricultural land.		This general comment is noted. The NP contains Significant environmental protections.	None.
8	Climate Change	The County Council through its Environment Strategy and Carbon Reduction Strategy is committed to reducing greenhouse gas emissions in Leicestershire and increasing Leicestershire's resilience to the predicted changes in climate. Neighbourhood Plans should in as far as possible seek to contribute to and support a reduction in greenhouse gas emissions and increasing the county's resilience to climate change.		This general comment is noted.	None.
8	Landscape	The County Council would like to see the inclusion of a local landscape assessment taking into account the Natural England's Landscape character areas, LCC's Landscape and Woodland Strategy and the Local District/Borough Council landscape character assessments. We would recommend that Neighbourhood Plans should also consider the street scene and public realm within their communities, further advice can be found in the latest 'Streets for All East Midlands' Advisory Document (2006) published by English Heritage.		Noted - however it is considered that the environmental protections in the NP are sufficient.	None.

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
8	Biodiversity	<p>The Natural Environment and Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, in the exercise of their duties, to the purpose of conserving biodiversity. The National Planning Policy Framework (NPPF) clearly outlines the importance of sustainable development alongside the core principle that planning should contribute to conserving and enhancing the natural environment and reducing pollution. Neighbourhood Plans should therefore seek to work in partnership with other agencies to develop and deliver strategic approach to protecting and improving the natural environment based on local evidence and priorities. Each Neighbourhood Plan should consider the impact of potential development on enhancing biodiversity and habitat connectivity such as hedgerows and greenways.</p>		Biodiversity is covered within the NP.	None.

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
8		<p>The Leicestershire and Rutland Environmental Records Centre (LRERC) can provide a summary of wildlife information for your Neighbourhood Plan area. This will include a map showing nationally important sites (e.g. Sites of Specific Scientific Interest), locally designated Wildlife Sites, locations of badger sets, great crested newt breeding ponds and bat roosts, and a list of records of protected and priority Biodiversity Action Plan species. These are all a material consideration in the planning process. If there has been a recent Habitat Survey of your plan area, this will also be included. LRERC is unable to carry out habitat surveys on request from a Parish Council, although it may be possible to add it into a future survey programme.</p> <p>Contact: <a href="mailto:planningecology@leics.gov.uk">planningecology@leics.gov.uk</a> or phone 0116 305 4108</p>			
8	Green Infrastructure	<p>Green infrastructure (GI) is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities, (NPPF definition). As a network, GI includes parks, open spaces, playing fields, woodlands, street trees, cemeteries/ churchyards, allotments and private gardens as well as streams, rivers, canals and other water bodies and features such as green roofs and living walls.</p>		Noted. The NP contains significant policies on green infrastructure.	None.

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
8		<p>The NPPF places a duty on local authorities to plan positively for a strategic network of GI which can deliver a range of planning policies including, building a strong, competitive economy, creating a sense of place and promote good design, promoting healthier communities by providing greater opportunities for recreation and mental and physical health benefits, meeting the challenges of climate change and flood risk, increasing biodiversity and conserving and enhancing the natural environment. Looking at the existing provision of GI networks within a community can influence the plan for creating and enhancing new networks and this assessment can then be used to inform CIL (Community Infrastructure Levy) schedules, enabling communities to potentially benefit from this source of funding.</p>			
8		<p>Neighbourhood Plan groups have the opportunity to plan GI networks at a local scale to maximise benefits for their community and in doing so they should ensure that their Neighbourhood Plan is reflective of the relevant Local Authority Green Infrastructure strategy. Through the Neighbourhood Plan and discussions with the Local Authority Planning teams and potential Developers communities are well placed to influence the delivery of local scale GI networks.</p>			

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8	Brownfield, Soils and Agricultural Land	The NPPF encourages the effective use of brown field land for development, provided that it is not of high environmental/ecological value. Neighbourhood planning groups should check with DEFRA if their neighbourhood planning area includes brownfield sites. Where information is lacking as to the ecological value of these sites then the Neighbourhood Plan could include policies that ensure such survey work should be carried out to assess the ecological value of a brownfield site before development decisions are taken.		Noted.	None.
8		Soils are an essential finite resource on which important ecosystem services such as food production, are dependent on. They therefore should be enhanced in value and protected from adverse effects of unacceptable levels of pollution. Within the governments 'Safeguarding our Soils' strategy, DEFRA have produced a code of practice for the sustainable use of soils on construction sites which could be helpful to neighbourhood planning groups in preparing environmental policies.			

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
8		High quality agricultural soils should, where possible be protected from development and where a large area of agricultural land is identified for development then planning should consider using the poorer quality areas in preference to the higher quality areas. Neighbourhood planning groups should consider mapping agricultural land classification within their plan to enable informed decisions to be made in the future. Natural England can provide further information and Agricultural Land classification.			
8	Impact of Development on Civic Amenity Infrastructure	Neighbourhood planning groups should remain mindful of the interaction between new development applications in a district area and the Leicestershire County Council. The County's Waste Management team considers proposed developments on a case by case basis and when it is identified that a proposed development will have a detrimental effect on the local civic amenity infrastructure then appropriate projects to increase the capacity to off-set the impact have to be initiated. Contributions to fund these projects are requested in accordance with Leicestershire's Planning Obligations Policy and the Community Infrastructure Legislation Regulations.		Noted.	None.

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
8	Communities	Consideration of community facilities is a positive facet of Neighbourhood Plans that reflects the importance of these facilities within communities and can proactively protect and develop facilities to meet the needs of people in local communities.		This general comment is noted. The NP has policies to secure the protection of existing community facilities and the identification of new ones.	
8		Neighbourhood Plans provide an opportunity to: 1. Carry out and report on a review of community facilities, groups and allotments and their importance with your community.			
8		2. Set out policies that seek to: * protect and retain these existing facilities * support and independent development of new facilities, and, * identify and protect Assets of Community Value and provide support for any existing or future designations.			
8		3. identify and support potential community projects that could be progressed.			
8		You are encouraged to consider and respond to all aspects community resources as part of the Neighbourhood Planning process. Further information, guidance and examples of policies and supporting information is available at <a href="http://www.leicestershirecommunities.org.uk/np/useful-information">www.leicestershirecommunities.org.uk/np/useful-information</a>			



Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
8	Economic Development	We would recommend including economic development aspirations with your Plan, outlining what the community currently values and whether they are open to new development of small businesses etc.		Employment policies feature in the NP.	
8	Superfast Broadband	High speed broadband is critical for businesses and for access to services, many of which are now no longer online by default. Having a superfast broadband connection is no longer merely desirable, but is an essential requirement in ordinary, day-to-day life.		There is a policy on broadband.	
8		All new developments (including community facilities) should have access to superfast broadband (of at least 30Mbps). Developers should take active steps to incorporate superfast broadband at the pre-planning phase and should encourage with telecoms providers to ensure superfast broadband is available as soon as build on the development is complete. Developers are only responsible for putting in place broadband infrastructure for developments of 30+ properties. Consideration for developers to make provision in all new houses regardless of the size of development should be considered.			

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
8	Equalities	While we cannot comment in detail on plans, you may wish to ask stakeholders to bear the Council's Equality Strategy 2016-2020 in mind when taking your Neighbourhood Plan forward through the relevant procedures, particularly for engagement and consultation work. A copy of the strategy can be viewed at:  <a href="http://www.leicestershire.gov.uk/sites/default/files/pdf/2017/1/30equality-strategy2016-202.pdf">www.leicestershire.gov.uk/sites/default/files/pdf/2017/1/30equality-strategy2016-202.pdf</a>		Noted. The NP is required to meet a range of EU policies including those on human rights.	None.
9	General Comment	Thank you for the invitation to comment on the Pre-Submission Version (October 2018) of the Leicester Forest East Neighbourhood Plan (2006-2029) as part of the Regulation 14 consultation that runs from 5 October 2018 until 23 November 2018. I write on behalf of Bidwells' client, Linden Homes Strategic Land in response to the consultation.	Robert Love, Senior Planner, Planning, Bidwells	Noted.	None.
9		I enclose with this response a site location plan entitled 'Location Plan'. My client's land interest at the form Kingstand Golf Course, Hinckley Road, Leicester Forest East, which forms part of this representation, comprises the land outlined in red.			

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
9		I also enclose a completed Response Form to the Pre-Submission Version of the Neighbourhood Plan. I understand from the Response Form that the seven week consultation is the final opportunity to respond to the Neighbourhood Plan before the Parish Council submit the Neighbourhood Plan to Blaby District Council.			
9		We have set out our observations on the draft Neighbourhood Plan by topic and, where appropriate referenced the relevant basic conditions that the plan will ultimately be tested against at examination. We hope that this approach proves helpful and that the constructive feedback will aid in the preparation of the Neighbourhood Plan.		Thank you - this is helpful.	
9		Paragraph: 065, Reference ID: 41-065-20140306 of the National Planning Practice Guidance (PPG) sets out the basic conditions that a draft Neighbourhood Plan or Order must meet if it is to proceed to referendum.		Noted.	None.
9		Only conditions a, and d-g apply to a Neighbourhood Development Plan (conditions b and c relate to Neighbourhood Development Orders only). These are:			
9		* Condition A: having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).			

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
9		* Condition D: the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.			
9		*Condition E: the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).			
9		*Condition F: the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.			
9		*Condition G: prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in accordance for the order (or neighbourhood plan).			
9		We are supportive of the rights of communities, such as Leicester Forest East, to prepare Neighbourhood Plans. Such plans, where they are prepared positively, have the potential to provide an additional local level of detail that may not be captured in those plans prepared by the District or Borough Authority. In particular, communities such as Leicester Forest East, which are near to major development, they also provide a level of comfort to ensure that the area retains the character and features that existing residents of the settlement's value.			

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
9	Section 1, Background and Contact	We note that the Plan area encompasses the whole of the Parish of Leicester Forest East and covers the period up to 2029, a timescale which deliberately mirrors that for the Adopted Blaby Local Plan.		Noted.	None.
9		We understand that the main purpose of the Neighbourhood Plan is not to duplicate national or district wide (i.e. Blaby) planning policies, but to sit alongside these, to add additional or more detailed policies specific to Leicester Forest East Parish. Where there are national and district-wide planning policies that meet the needs and requirements of the Parish they are not repeated here.			
9		To ensure that the Neighbourhood Plan meets condition E of the required conditions once the Plan is made, we require commitments towards a review of the Neighbourhood Plan.		The NP does not need to include a review in order to meet condition E of the Basic Conditions - although it is made clear that the NP will be kept under review. There is a section (p55) on Monitoring and Review It does not need to be a policy as such because no planning applications will be determined against it.	

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
9		<p>Following examination of the Local Plan Delivery Development Plan Document (Delivery DPD) in July-August 2018, a schedule of Main Modifications (dated September 2018) was published by Blaby District Council. Main modification 1 (MM1) identifies a new policy: Policy LPR1 'Local Plan Review' which sets out circumstances for which a new, full or part Local Plan will commence. Circumstance 'a' is adoption of the Strategic Growth Plan, Circumstance 'b' is when changes occur within the HMA or the OAN for development or the spatial distribution of growth across the HMA, unless there is sufficient flexibility already provided for within the Plan. Circumstance 'c' is where monitoring targets against the housing trajectory identify significant and persistent shortfalls in the delivery of housing. The review should be commenced within six months of the occurrence of one of the circumstances and should be submitted for examination within three years from the commencement of the review.</p>			
9		<p>We consider that the Neighbourhood Plan should also identify a Specific Neighbourhood Plan Review policy which commits the Neighbourhood Plan to be reviewed alongside a review of the Local Plan as specified under Policy LPR1 of the Delivery DPD. This will ensure that the Neighbourhood Plan remains up to date with the strategic policies of the Local Plan.</p>			

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
9		<b>Request Amendment to Section 1: Background and Context to include a specific Neighbourhood Plan Review policy when such a time as the strategic policies for the adopted Local Plan is reviewed.</b>			
9	Section 2: Leicester Forest East Village	We have no comments to make on Section 2: <b>Leicester Forest East Village of the Neighbourhood Plan.</b>			
9		<b>No comments on Section 2: Leicester Forest East Village of the Neighbourhood Plan.</b>		Noted.	None.
9	Section 3: Community Engagement Process	We note that a consultation event was held on 10 September 2016 to set out the initial context and stages of the Neighbourhood Plan and then a community questionnaire was delivered to all 2,566 houses (as well as being available online) which took place in May 2017. 158 responses were received at a response rate of 6.15%. A number of Theme Groups' were established to inform the evidence base of the plan.		Details of the consultation arrangements will be documented in the Consultation Statement that will accompany the Submission version of the NP.	
9		Following the above events, we also understand the Parish Council undertook an initial consultation on a published Draft Neighbourhood Plan from 25 June over a seven week period. This consultation does not appear to have been documented in the Neighbourhood Plan.			

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
9		We note from the Neighbourhood Development Plan Committee minutes held at the end of May that the Draft Neighbourhood Plan would be made available online. We monitored the publication of the Draft Neighbourhood Plan on the Parish Council website and social media pages during this time period, however, we could not find evidence to suggest that it was made publicly available online.		This is a reference to the pre-submission draft that was delayed. The pre-submission consultation commenced in October 2018 and the website was updated at that time.	
9		In view of the above, we consider that details of the Draft Neighbourhood Plan and consultation was not adequately published or made publicly available online.		The documentation will be made available on submission of the NP.	
9		Furthermore, we note that no 'Call for Sites' was undertaken by the Parish Council in preparation of the Draft Neighbourhood Plan meaning that an opportunity for consultation with a group of key stakeholders i.e. land owners was not undertaken. As a result, there has not been an up to date assessment of which sites present opportunity for the most sustainable development in Leicester Forest East.			



Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
9		There has not been a positive process behind the preparation of this plan and the principle of sustainable development has not been a key consideration as required under condition D of the basic conditions.		There is no requirement for an NP to allocate sites. This does not mean that the process has not been positive or that it does not contribute to sustainable development. This is an incorrect assumption. The extent of Development activity in the Parish means that minimum Requirements have been exceeded with the LP allocation.	
9	<b>Comments on Section 3:</b>	<b>Community Engagement Process. We consider that details of the Draft Neighbourhood Plan and consultation was not adequately published or made available online.</b>		This will be addressed on submission of the NP, along with these responses to Regulation 14 comments.	
9	Section 4: Vision	The Neighbourhood Plan sets out a clear vision for the future development of the Parish based on local consultation: 'Leicester Forest East will provide a thriving and prosperous community which delivers a high quality of life for residents and businesses alike. Whilst maintaining excellent links to the city and wider country we will create a sustainable and desirable place to live, protecting our limited natural environment and supporting appropriate development that meets local needs.		Noted.	None.

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
9		The aim is for the vision to be realised through a small number of planning policies as set out within the Neighbourhood Plan.			
9		We are supportive of the Vision for the Neighbourhood Plan. <b>Support the Vision for Leicester Forest East.</b>			
9	Section 5: Policies, Policy H1: Residential Site Allocations	Policy H1: Residential Site Allocations identifies two sites for development land at Grange Farm and land off Webb Close.			

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
9		We support the allocation of sites for residential development within Leicester Forest East. However, as, previously discussed no 'Call for Sites' was undertaken by the Parish Council in preparation of the Draft Neighbourhood Plan. Whilst it must be acknowledged that this draft policy is in broad conformity with the emerging Local Plan, the allocations identified in the Local Plan represent a minimum figure and there has been enough time since the consultation process on the emerging Local Plan for more sites to become deliverable, available and achievable in Leicester Forest East. We feel that there has not been an up to date assessment of which sites present the opportunity for the most sustainable development in Leicester Forest East. As such, the process behind preparing this policy has not put the principle of sustainable development as a key consideration as required under condition D of the basic conditions.		As stated above, there is no requirement for an NP To allocate any sites. LFE has met its minimum Requirements and so has met the Basic Conditions. An Up to date assessment of available sites was not Necessary as the Local Plan allocations would take Place irrespective of the NP.	
9		A Call for Sites and an appropriate assessment of the sites put forward should be undertaken to support this policy of the Draft Neighbourhood Plan.			

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
9		<b>Object to Policy H1: Residential Site Allocations as there has been no 'Call for Sites' or up-to-date assessment of all sites available for a residential allocation on the Neighbourhood Plan.</b>		The latest 'SHLAA' information from BDC was used, but a more comprehensive process was not required as the NP is not allocating additional sites.	
9	Policy H2: Limits to Development	Limits to Development states that 'development proposals within the Neighbourhood Plan area on sites within the Limits to Development will be supported where they comply with the policies of this Neighbourhood Plan and the Blaby District Local Plan and subject to meeting design policy and amenity considerations. Land outside the defined Limits to Development will be treated as open countryside, where development will be carefully controlled in line with local and national strategic planning policies'.		As stated above, there is a section on review should circumstances change, but this will not be a policy.	

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
9		This policy meets the basic requirements of conditions A and E which seek to ensure that a Neighbourhood Plan has regard for national and strategic development plan policies. To ensure that the Neighbourhood Plan meets condition E of the required conditions once the Plan is made, we request additional text that states that the Limits to Development under Policy H2 will be subjected to a review in accordance with the Neighbourhood Plan Review policy proposed under Section 1 of this representation alongside a review of the Local Plan under Policy LPR1 of the Delivery DPD. This will ensure that the Neighbourhood Plan remains up to date with the strategic policies in the Local Plan.			
9		<b>Object and Request Amendment to Policy H2: Limits to Development. Inclusion of additional text that states that the Limits to Development under Policy H2 will be subject to a review in accordance with the Neighbourhood Plan Review policy proposed above under Section 1 of this representation alongside a review of the Local Plan under Policy LPR1 of the Delivery DPD.</b>			

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
9	Policy H3: Housing Mix	<p>Housing Mix states that 'new housing development proposals should provide a mixture of housing types specifically to meet identified local needs of the Parish. Priority should be given to dwellings of 1, 2 and 3 bedrooms and to homes suitable for older people, including 2 and 3 bedroom bungalows and dwellings suitable for those with restricted mobility.</p> <p>Condition E requires that a Neighbourhood Plan is in general conformity with strategic development plan policies. As it stands the Neighbourhood Plan conflicts with the Core Strategy (adopted February 2013) in that it does not allow for change in local housing need.</p>		<p>Noted. We will add in reference to the mix being based on the most up to date evidence of housing need. At the moment, that relates to the mix identified in the policy. We will amend the policy to allow for change should the need change over time.</p> <p>The policy allows for a mix within each development site so the proposed change to 'across all housing sites' is unnecessary.</p>	
9	Policy CS8:	<p>Mix of Housing of the adopted District's Core Strategy requires residential proposals for developments of 10 or more dwellings 'to provide an appropriate mix of housing types, tenure and size to meet the needs of existing and future households in the District, taking into account the latest Strategic Housing Market Assessment and other evidence of local need'.</p>			

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
9		The most up-to-date evidence on housing need should be the foundation for the housing mix required on a development site as highlighted by the adopted Core Strategy. Sentence 2 of Policy H2 presents a very rigid housing mix which could become out of date as new housing evidence comes to light, particularly as houses are built in the village which meet the currently identified housing need. A degree of flexibility needs to be incorporated into the wording of the policy. Core Strategy Policy CS8 achieves the same goal as Policy H3 of the Draft Neighbourhood Plan whilst not restricting future development to out of date housing need requirements and should be used as guidance.			
9		Further, it should be stated that there needs to be a mix of housing across all sites as opposed to a concentration of certain types of housing on specific sites, thereby ensuring that local housing needs is appropriately addressed by new development.			
9		In view of the above, we request an amendment to Policy H3 so that it states that 'new housing development proposals should provide a mixture of housing types, tenures, sizes across all housing sites in order to meet the needs of existing and future households. In accordance with the latest Strategic Housing Market Assessment and other evidence of local need/			

Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
9		<b>Object and Request Amendment to Policy H3: Housing Mix. Omission of detailed mix of housing sizes set out in the policy. Amendment to policy so that it states that 'new housing development proposals should provide a mixture of housing types, tenures and sizes across all housing sites in order to meet the needs of existing and future households, in accordance with the latest Strategic Housing Market Assessment and other evidence of local need.'</b>			
9	Policy H4: Affordable Housing	Affordable Housing states that 'to support the provision of mixed sustainable communities, to meet the identified need within the community and to increase the level of affordable housing within the Parish:			
9		a) Where possible, 35% of all homes on developments comprising 11 or more dwellings shall be affordable subject to viability considerations,			
9		b) The mix of affordable housing shall be in line with up to date evidence of local housing need,			
9		c) Developments should be 'tenure blind', where affordable housing is indistinguishable from market dwellings and is spread throughout the development,			



Response number	Plan section / policy number	Comment	From	Response	Proposed amendment
9		d) It is not possible to provide affordable housing on site, in exceptional circumstances it will be acceptable to provide funding in lieu of affordable housing on-site if this leads to the provision of additional affordable housing in the Parish. If this is not possible within the timeframe for spending commuted sums it can be used across the District,			
9		e) Development proposals that contribute to the provision of affordable homes that are suited to the needs of older people and those with disabilities will be supported,			
9		f) The provision of affordable housing for those with a 'local connection' to the parish will be prioritised. If there are no sustainable households with a Leicester Forest East connection, then the properties will be made available to others on the Council's waiting list.'			
9		We support the provision of mixed sustainable communities, to meet the identified need within the community and to increase the level of affordable within the Parish as addressed by Policy H4.			
9		However, we consider that Policy H4 of the draft Neighbourhood Plan conflicts with Condition E of the basic conditions when considered against Policy		We believe that the policy is in general conformity with the Core Strategy.	None.

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9		<p>CS7: Affordable housing - a strategic policy contained within the adopted Core Strategy.</p> <p>Policy CS7: Affordable Housing of the Blaby District Council Local Plan (Core Strategy) Development Plan Document (adopted February 2013) states that the (District) Council will seek to secure a minimum 25% of the total number of dwellings as affordable on all developments of 15 or more dwellings.'</p> <p>We note that Policy H4 of the draft Neighbourhood Plan is proposing a higher percentage requirement of affordable housing (35% instead of 25%) than that specified in Policy CS7 of the adopted Core Strategy. The draft Neighbourhood Plan also proposes a lower housing delivery threshold for this requirement to apply (11 dwellings instead of 15 dwellings).</p>		<p>It is not necessary to mirror the CS policy where there is clear local evidence for a variation. Far from providing no evidence, the introductory section of 5.1.6 clearly states that social rented housing is only at a level of 0.7% in the Parish compared to 7.7% across Blaby as a whole. It is for this reason that the affordable housing policy varies from that of the District-wide Core Strategy.</p>	
9		<p>No evidence has been provided to justify an increased affordable housing requirement or delivery threshold which have resulted in this conflict with the adopted development plan</p>			
9		<p>We therefore consider that Policy H4 does not meet the basic condition E, whereby the making of the Neighbourhood Plan must be in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</p>			

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9		In view of the above, we request an amendment to limb 'a' of Policy H4 to make it in conformity with the strategic development plan. The policy should state that: 'Where possible, a provision of all homes on developments should be affordable in accordance with adopted Development Plan policies subject to viability considerations'.			
9		<b>Object and Request Amendments to Policy H4: Affordable Housing. An amendment is required to ensure that the Neighbourhood Plan in general conformity with the statutory development plan requirements on affordable housing and should recognise viability implications on development sites. Amendment to limb 'a' to 'Where possible, a provision of all homes on developments shall be affordable in accordance with adopted Development Plan policies subject to viability considerations'.</b>			
9	Policy H6: Housing Designs	States that 'All new development proposals of one or more houses, replacement dwellings and extensions will be expected, where possible, to satisfy the following building design principles:			
9		a) it is of a density, size, scale, massing and height that reflects the character of the surrounding area to provide space and pleasant street scenes and inclusive road linking with pedestrians short cuts, and			

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9		b) the design and materials are in keeping with the individual character and local distinctiveness of the Parish through building styles which should be diverse and make a valuable contribution to retaining the integrity of the built form e.g. interlocking eaves, flashing buttresses, local slate and brickwork, and			
9		c) adequate off road parking should be provided in line with Leicestershire County Council Highways design guidance as described in the 6C's design Guide, and,			
9		d) the design reflects best environmental good practice (for example incorporating where appropriate, solar panels, rainwater harvesters, car electrical charging points and photovoltaic glass), and			
9		e) suitable landscaping should be provided, where appropriate'.			
9		Generally speaking, we are supportive of Policy H6 and welcome the Neighbourhood Plan's aspirations to ensure high quality design through incorporating key design principles. We do however request a few small amendments to Policy H6.			

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9		We request the omission of 'interlocking eaves, flashing buttresses, local slate and brickwork'. under limb 'b' of Policy H6. We consider this text to be onerous. Different housebuilders naturally have varied house types and so to include specific examples could prevent schemes which have a design that complements the location coming forward which have only some or do not have any of these specific features. A consideration of the individual character and local distinctiveness of Leicester Forest East could be broken down in the text preceding the policy in order to explore this topic to give a greater design understanding of the area.		The policy will be amended to remove this set of examples.	Amendment as indicated.
9		We request the additional wording '(or any subsequent document)' is added after Leicestershire County Council Highways design guidance as described in the 6C's design Guide' under limb 'c' of Policy H6. This is so that this policy remains up to date when guidance is updated or superseded in the future.		Agreed. We will remove the reference to 6C's s this has now been superseded.	Amendment to be made as proposed.

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9		We request the omission of '(for example incorporating where appropriate, solar panels, rainwater harvesters, car electrical charging points photovoltaic glass)' under limb (d) of Policy H6. This section of the policy is onerous and unnecessary considering that the Core Strategy Policy CS21: Climate Change establishes a foundation of environmental considerations which any development proposal must consider. Suggestions of environmental measures could be broken down in the text preceding the policy in order to greater explore this issue without limiting through policy what a development could provide to such suggestions.		The policy says 'where possible ...' so is not considered onerous.	None.
9		<b>Object and Request Amendments to Policy H6: Housing Design. Omission of 'e.g. interlocking eaves, flashing buttresses, local slate and brickwork' under limb 'b'. Additional wording (or any subsequent document)' is added after Leicestershire County Council Highways design guidance as described in the 6C's design Guide' under limb 'c'. Omission of '(for example incorporating where appropriate solar panels, rainwater harvesters, car electrical charging point and photovoltaic glass)' under limb 'd'.</b>			

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9	Proposed Allocation of the Site	My client wishes to promote their land interest at land at the former Kingstand Golf Course, Hinckley Road, Leicester Forest East for residential development through a site allocation in the Leicester Forest East Neighbourhood Plan. The site equates to an area of approximately 17.00 acres (6.88 ha). The site location plan entitled 'Location Plan' enclosed with this representation shows the extent of my client's site outlined in red.		Noted. However, there is no requirement or the NP to allocate additional sites to those contained within the Local Plan. The Qualifying Body does not wish to allocate further sites through the NP.	
9		The site comprises a redundant golf course, located due west of the settlement edge of Leicester Forest East and south of Hinckley Road, (A47). It is designated as open countryside. Existing access to the site is via Beggars Lane to the east of the site and to the rear of the Taylor Wimpey Grangewood Manor residential development. The site once housed a floodlit driving range and a 9-hole pay and play course and contains man-made landscaping features characteristic of a golf course. Adjacent to the site are two permanent buildings (bar lounge and equipment store) along with several temporary structures and hardstanding (car park and driveway) that formed part of the redundant golf course. The site is well screened by existing landscaping including mature hedgerows.			

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9		<p>Between the site and Grangewood Manor is a separating the two Kingstand Farm comprises various buildings and external storage of machinery and various paraphilia including a large area of hardstanding. This land is accessed via a long driveway off the A47 to the north. To the north of the site beyond the A47 is a large area of sports clubs and pitches including Leicester Forest Rugby and Tennis and Ivanhoe Cricket Clubs. To the south-east of the site lies the Lubbesthorpe Sustainable Urban Extension (SUE), which is allocated for some 4,250 homes under the adopted Core Strategy. The land to the east of the site is subject to an undetermined planning application (reference 17/1735/FUL) for 160 dwellings and associated development progressed by Westleigh Homes.</p>			



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9		<p>Overall, we consider that the site would be suitable for development and there are no known constraints to the proposed allocation of the site for housing in the Leicester Forest East Neighbourhood Plan. A proposed new vehicular access to the site can be safely achieved with sufficient visibility along the A47 and it is considered that the surrounding junctions and road network has sufficient capacity to accommodate any additional traffic generated. The entire site is located within Flood Zone 1 according to the Environment Agency Flood Maps online, this is the lowest risk flood zone (less than 1 in 1,000 probability of river flooding). Delivery of the proposed allocation would be via a planning application accompanied by a detailed package of technical information to demonstrate that the proposed development will not result in any significant harm to matters acknowledged importance, such as highway safety, flooding ecology, arboriculture, archaeology or landscape and visual amenity</p>			

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9		<p>It is considered that the site (outlined in red on the enclosed Location Plan) can accommodate approximately 175 dwellings. An illustrative masterplan for the site can be prepared to demonstrate how a proposed layout and design could accommodate residential development of this quantum on this site. The site can provide significant benefits including contributing towards the housing needs of Leicester Forest East and the wider Blaby District by providing a mix of market and affordable housing over the plan period contributing to a deliverable supply of housing during the plan period and contributing towards the local economy.</p>			
9		<p>In view of the above, the site represents an achievable, suitable and deliverable allocation to support the necessary housing growth in Leicester Forest East and Blaby District. The proposed development of the site will contribute towards local housing need and Blaby District Council's current or future housing requirements. The site can be developed within the forthcoming five year period, which will contribute significantly towards maintaining a rolling five year supply of suitable housing sites for the District. The site's status as previously developed land in part should be prioritised in the Leicester Forest East Neighbourhood Plan as being considered for development now.</p>			

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9	Conclusion	My client welcomes this opportunity to comment on the Pre-Submission version of the Leicester Forest East Neighbourhood Plan.		Noted.	None.
9		As it stands, the Neighbourhood Plan does not meet the basic conditions a and d-g as set out above.		We do not agree with this assessment. The NP meets the Basic Conditions.	None.
9		We require that the Neighbourhood Plan should identify a specific Neighbourhood Plan Review policy which commits the Neighbourhood Plan to be reviewed alongside a review of the Local Plan as specified under Policy LPR1 of the Delivery DPD. This will ensure that the Neighbourhood Plan remains up to date with the strategic policies of the Local Plan.		The NP refers to a review should circumstances change.	Amend as proposed.
9		My client's site represents an achievable, suitable and deliverable site for residential allocation in the Leicester Forest East Neighbourhood Plan to meet local housing need and the District's housing requirements and to boost the supply of housing.		The NP does not intend to allocate any additional sites to those already identified, and is not required to do so.	None.
9		Should you have any queries in respect of my client's representation, please do not hesitate to contact me. My contact details are included in the letterhead. Our client would be happy to meet in person to discuss our representation and the site in more detail.		Noted.	None.

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9		Alternatively, I look forward to receiving your written confirmation of my client's representation to the Pre-submission Version of the Leicester Forest East Neighbourhood Plan and I look forward to receiving notification of all future Neighbourhood Plan consultations.		The responses will be made available once the Parish Council has approved the amendments to the NP.	
10	General Comment	Thank you kindly for copying me the Committee's draft plan, inviting me to respond with any comments or reflections that I might have on it.	Edward Argar, MP for Charnwood	Thank you for these comments.	
10		I wanted to take the opportunity to commend the draft plan which has clearly involved a lot of detailed thoughtful work. The plan sets out a coherent long-term approach to development and infrastructure priorities for the village, and does so locating those priorities in the broader context of both the wider area, and the character and previous development of the village.			
10		My response is brief because I believe the vision articulated in the draft document is both a realistic and positive one, and would particularly highlight the very clear articulation both of the local infrastructure needs in LFE that need to go hand-in-hand with any development, the positive emphasis on the environment and 'wildlife' corridors', and importantly the challenges posed to LFE relating to noise, traffic, and the impact of the M1 on the village.			

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10		I believe that the draft plan has the potential to make a real difference to the village, and to help strike the right balance with any future development to ensure that LFE has the infrastructure it needs to meet future needs, and retains its own character.			
10		I would be grateful if you could pass on my comments, and my congratulations on their work on this document, to the Committee and the Parish Council.			