

## NEIGHBOURHOOD PLAN

### PRE-SUBMISSION CONSULTATION RESPONSES

No.	Chapter/ Section	Policy Number	Respondent	Comment	Response	Amendment
1			<b>Anglian Water</b>	SP is located outside of their area of responsibility - do not serve Charnwood District	Noted	None
2			<b>Leila Griffiths-Law – Historic Buildings</b>	Agree with lot of suggestions – would add the ‘Wartburg’	Thank you. After consideration we decided not to include the Wartburg.	None
3			<b>Highways England</b>	<p>We welcome the opportunity to comment on the Pre-Submission Version of the Sileby Neighbourhood Plan which covers the period 2018-2036. 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.</p> <p>Highways England has been appointed by the Secretary of State for Transport as 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 Sileby Neighbourhood Plan, our principal interest is safeguarding the A46 which routes approximately 1 mile east of the Plan area.</p> <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 Sileby has been</p>	Noted	None

				<p>prepared in conformity with the adopted Charnwood Core Strategy (2011-2028) and the emerging Local Plan and this is acknowledged within the document.</p> <p>Sileby is identified in the emerging Charnwood Local Plan as a 'Service Centre' and has no specific housing allocation. We note within the Sileby Neighbourhood Plan a housing target of 622 dwellings has been proposed due to the uncertainty surrounding the levels of housing needed across the Borough. It is noted that the parish has already reached this figure due to existing planning approvals since April 2017 and small-scale windfall developments. A further 77 dwellings have been proposed across six reserve sites in preparation for a potential increase in the Borough's housing targets.</p> <p>Due to the small scale of additional development growth being proposed, it is not considered that there will be any significant impacts on the operation of the SRN.</p> <p>We have no further comments to provide and trust that the above is useful in the progression of the Sileby Neighbourhood Plan.</p>		
4			<b>Jim Smith (Resident)</b>	<p>Herewith are my comments on the Neighbourhood Plan (Pre-Submission). Please accept my apologies for being late sending this to you.</p> <p>The plan is interesting and covers all aspects that I am concerned about. If "made" it will help to protect the character of the village, its historic and architectural heritage, as well as the wildlife and natural environment both within, and surrounding, Sileby.</p> <p>It is obvious that a lot of hard work has been done to get</p>	<p>Thank you for commenting</p> <p>Noted. Thanks.</p>	None

			<p>to this stage, for which NPAC, their advisors and everyone else involved should receive our grateful thanks. I do hope that it is adopted by the population, with an undisputable majority.</p> <p>The requirement for all new builds to have off-road parking, at the same time having front gardens that are not paved (possibly by means of a covenant in the deeds) is essential in any new development.</p> <p>I did not understand the methodology used on pages 28 &amp; 29 to set the housing growth target for the village. I read this as setting a target of several hundred more houses to be allowed despite the village having already supplied more than required by CBC in the local plan.</p> <p>Where developers are required to replant with native species, could “entirely grown within the UK” be added. This would help to limit the importation of harmful pests and parasites.</p> <p>On page 74 reference is made to “the town”, this should be “the village”. Too often developers and planning authorities think of Sileby as a small town, with all the “benefits” that that would imply.</p> <p>Page 25 states “all properties should have located at the</p>	<p>Noted</p> <p>The Local Plan target has been superseded and in the absence of CBC announcing a revised target, this is a formula that has been agreed with CBC as a working target in advance of the final figure being announced. The submission NP will clarify this.</p> <p>We will add in grown within the UK. This refers to the import of ash die-back (Chalara) through English tree saplings being sent to E. Europe for raising to planting size then returned, infected, to N Leicester Park &amp; Ride (Woodland Trust) - it’s now established as a cause of ash dieback here</p> <p>Agreed.</p> <p>Agreed. Change to</p>	<p>None</p> <p>None</p> <p>Change to be made as indicated to policy Env 8.</p> <p>Change to be made as indicated</p> <p>Change to be</p>
	Pages 28&29				
	Page 74				
	Page 25				

	Page 55  Page 66			<p>front of the property, or within allocated car parking, electric charging points”. This would be an admirable step forward, however there are several manufacturers of EV charge points in the UK, and I have found, in conversation with other EV owners, that brand loyalty can be quite fierce!</p> <p>I realise that this is not within the scope of the NP, but if the King Street car park becomes split between short and long stay parking (I imagine this to be similar to Station Road in Quorn) or “Pay and Display” then upon whom would the responsibility rest for policing this?</p> <p>Looking at the aesthetics of the presentation itself (if I may), my preference would be to enable “widows and orphans” protection when writing the original document, so that paragraphs are not split over page breaks. This might help with readability. Navigation around the document when reading it on a computer would be much easier and faster if the entries on the contents page were links to the appropriate locations.</p> <p>On page 55 there is a spelling mistake, where jitty has been type as jiity; and the last paragraph ends in mid-sentence.</p> <p>On page 66 the photograph of Swan Street is reversed.</p>	<p>‘Include infrastructure and the available power supply that will support the charging of electric vehicles within the property boundary’.</p> <p>This is the responsibility of CBC.</p> <p>Agreed – we will check the final edit for these issues.</p> <p>Noted – these typos will be addressed.</p> <p>Noted</p>	<p>made as indicated.</p> <p>None</p> <p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>The image will be restored.</p>
5			<b>Historic England</b>	<p>If you have not already done so, we would recommend that you speak to the planning and conservation team at Charnwood Borough Council together with the staff at Leicestershire County Council archaeological advisory service who look after the Historic Environment Record.</p>	<p>Noted The historic environment elements of the Neighbourhood Plan have taken these sources into</p>	<p>None</p>

			<p>They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (<a href="http://www.heritagegateway.org.uk">www.heritagegateway.org.uk</a>). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.</p> <p>Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at: -</p> <p><a href="https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/">https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/</a></p> <p>You may also find the advice in <i>“Planning for the Environment at the Neighbourhood Level”</i> useful. This has been produced by Historic England, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information. This can be downloaded from:</p> <p><a href="http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf">http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf</a></p> <p>If you envisage including new housing allocations in your plan, we refer you to our published advice available on our website, <i>“Housing Allocations in Local Plans”</i> as this relates equally to neighbourhood planning. This can be found at <a href="https://content.historicengland.org.uk/images-">https://content.historicengland.org.uk/images-</a></p>	account.	
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				<a href="#">books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans.pdf/&gt;</a>		
6			<b>Natural England</b>	<p>Thank you for your consultation on the above dated 26 November 2018.</p> <p>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.</p> <p>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.</p> <p><b>Natural England does not have any specific comments on this draft neighbourhood plan.</b></p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p> <p>For any further consultations on your plan, please contact: <a href="mailto:consultations@naturalengland.org.uk">consultations@naturalengland.org.uk</a>.</p> <p><b>Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities</b></p> <p><b><u>Natural environment information sources</u></b></p>	<p>Noted.</p> <p>The environmental elements of the Neighbourhood Plan have taken these issues into account.</p>	None

			<p>The <a href="#">Magic</a><sup>1</sup> website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: <b>Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones)</b>. Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available <a href="#">here</a><sup>2</sup>.</p> <p><b>Priority habitats</b> are those habitats of particular importance for nature conservation, and the list of them can be found <a href="#">here</a><sup>3</sup>. Most of these will be mapped either as <b>Sites of Special Scientific Interest</b>, on the Magic website or as <b>Local Wildlife Sites</b>. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.</p> <p><b>National Character Areas</b> (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found <a href="#">here</a><sup>4</sup>.</p> <p>There may also be a local <b>landscape character assessment</b> covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and</p>		
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<sup>2</sup> <http://www.nbn-nfbr.org.uk/nfbr.php>

<sup>3</sup> <http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx>

<sup>4</sup> <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making> <sup>5</sup> <http://magic.defra.gov.uk/>

			<p>identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.</p> <p>If your neighbourhood planning area is within or adjacent to a <b>National Park</b> or <b>Area of Outstanding Natural Beauty</b> (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding Natural Beauty website.</p> <p>General mapped information on <b>soil types</b> and <b>Agricultural Land Classification</b> is available (under 'landscape') on the <a href="#">Magic</a><sup>5</sup> website and also from the <a href="#">LandIS website</a><sup>5</sup>, which contains more information about obtaining soil data.</p> <p><b><u>Natural environment issues to consider</u></b></p> <p>The <a href="#">National Planning Policy Framework</a><sup>6</sup> sets out national planning policy on protecting and enhancing the natural environment. <a href="#">Planning Practice Guidance</a><sup>7</sup> sets out supporting guidance.</p> <p><u>Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.</u></p> <p><u>Landscape</u></p> <p>Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry-stone walls</p>		
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<sup>5</sup> <http://www.landis.org.uk/index.cfm>

<sup>6</sup> <https://www.gov.uk/government/publications/national-planning-policy-framework--2>

<sup>7</sup> <http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/>

			<p>and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.</p> <p>Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.</p> <p><u>Wildlife habitats</u></p> <p>Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed <a href="#">here</a><sup>9</sup>), such as Sites of Special Scientific Interest or <a href="#">Ancient woodland</a><sup>10</sup>. If there are likely to be any adverse impacts, you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.</p> <p><u>Priority and protected species</u></p> <p>You'll also want to consider whether any proposals might affect priority species (listed <a href="#">here</a><sup>11</sup>) or protected species. To help you do this, Natural England has produced advice <a href="#">here</a><sup>12</sup> to help understand the impact of particular developments on protected species.</p> <p><u>Best and Most Versatile Agricultural Land</u></p> <p>Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication <a href="#">Agricultural Land</a></p>		
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Classification: protecting the best and most versatile agricultural land<sup>13</sup>.

**Improving your natural environment**

Your plan or order can offer exciting opportunities to enhance your local environment. If you are setting out policies on new development or proposing sites for development, you may wish to consider identifying what environmental features you want to be retained or enhanced or new features you would like to see created as part of any new development. Examples might include:

- Providing a new footpath through the new development to link into existing rights of way.
- Restoring a neglected hedgerow.
- Creating a new pond as an attractive feature on the site.
- Planting trees characteristic to the local area to make a positive contribution to the local landscape.
- Using native plants in landscaping schemes for better nectar and seed sources for bees and birds.
- Incorporating swift boxes or bat boxes into the design of new buildings.
- Think about how lighting can be best managed to encourage wildlife.
- Adding a green roof to new buildings.

You may also want to consider enhancing your local area in other ways, for example by:  
<http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.asp>

				<p>X</p> <p><sup>10</sup> <a href="https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences">https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</a></p> <p><sup>11</sup> <a href="http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.asp">http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.asp</a></p> <p>X</p> <p><sup>12</sup> <a href="https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals">https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals</a></p> <p><sup>13</sup> <a href="http://publications.naturalengland.org.uk/publication/35012">http://publications.naturalengland.org.uk/publication/35012</a></p> <p><sup>4</sup> Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.</p> <p><sup>5</sup> Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.</p> <p><sup>6</sup> Identifying green areas of particular importance for special protection through Local Green Space designation (see <a href="#">Planning Practice Guidance on this</a> <sup>14</sup>).</p> <p><sup>7</sup> Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).</p> <p><sup>8</sup> Planting additional street trees.</p> <p><sup>9</sup> Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.</p> <p>Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or</p>		
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				clearing away an eyesore).  <a href="http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-ofway-and-local-green-space/local-green-space-designation/">http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-ofway-and-local-green-space/local-green-space-designation/</a>		
7			<b>National Grid</b>	<p>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.</p> <p><b><u>About National Grid</u></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 customers. National Grid own four of the UK's gas distribution networks and transport 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> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p>	Noted	None

**Specific Comments**

An assessment has been carried out with respect to National Grid’s electricity and gas transmission apparatus which includes high voltage electricity assets and high-pressure gas pipelines, and also National Grid Gas Distribution’s Intermediate and High-Pressure apparatus.

**National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.**

**Key resources / contacts**

National Grid has provided information in relation to electricity and transmission assets via the following internet link:  
<http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/>

**Electricity distribution**

The electricity distribution operator in Charnwood Council is Western Power Distribution. Information regarding the transmission and distribution network can be found at:  
[www.energynetworks.org.uk](http://www.energynetworks.org.uk)

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 shown below to your consultation database

Hannah Lorna Bevins  
Consultant Town Planner  
[n.grid@woodplc.com](mailto:n.grid@woodplc.com)

				<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  <a href="mailto:box.landandacquisitions@nationalgrid.com">box.landandacquisitions@nationalgrid.com</a>  National Grid House  Warwick Technology Park  Gallows Hill  Warwick  CV34 6DA</p> <p>I hope the above information is useful. If you require any further information, please do not hesitate to contact me.</p> <p>Yours faithfully</p> <p>[via email]  <b><u>Hannah Lorna Bevins Consultant Town Planner</u></b></p>		
8	Page 10		LCC	<p>Leicestershire County Council is supportive of the Neighbourhood plan process and welcome being included in this consultation.</p> <p><b><u>Highways</u></b>  <b>Specific Comments</b>  <b>Page 10: Vision fourth bullet point:</b> Accepting that it is not policy text, nevertheless it would be helpful to understand what is considered to be the intended practical reality/meaning of “...Traffic will by-pass the village leaving streets free for local traffic...”</p>	<p>Noted.</p> <p>The intention is to minimise the increase in traffic through Sileby as indicated by the second sentence in the same</p>	<p>None</p> <p>Change to be made as indicated</p>

				OK	bullet point. Will change to say 'Most traffic ...'	
	Page 10			<b>Page 10: Vision fifth bullet point:</b> Accepting that it is not policy text, nevertheless it would be helpful to understand what is considered to be the intended practical reality/meaning of "... <i>Electric vehicle charging will be embedded into highway developments...</i> "	This supports the provision of electric vehicle charging	None
	Page 70	T2		<b>Page 70: Policy T2:</b> A minor modification to the policy text thus (highlighted bold underlined): "...or if the <b><u>residual</u></b> cumulative impact of additional traffic...etc." would that it the fully reflected the wording of the NNPF 2018	Agreed	Change to be made as indicated.
				<b>General Comments</b> The County Council recognises that residents may have concerns about traffic conditions in their local area, which they feel may be exacerbated by increased traffic due to population, economic and development growth.  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.	These general comments are noted however it is too late in the process to introduce new policy ideas.	None

				<p>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.</p> <p>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.</p> <p>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.</p> <p>The current financial climate means that the 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</p>		
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			<p>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.</p> <p><b>Flood Risk Management</b></p> <p>Below is our general guidance, followed by comments on the specific document in question and Sibley.</p> <p>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 ensures that flood risk to the site is accounted for when designing a drainage solution.</p> <p>The LLFA is not able to:</p> <ul style="list-style-type: none"> <li>• 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> <p>When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend</p>		
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			<p>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> <li>• Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding.</li> <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> <li>• Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk.</li> </ul> <p>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.</p> <p>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</p>		
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			<p>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.</p> <p>LCC, in its role as LLFA will not support proposals contrary to LCC policies.</p> <p>For further information it is suggested reference is made to the <a href="#">National Planning Policy Framework (March 2012)</a>, <a href="#">Sustainable drainage systems: Written statement - HCWS161 (December 2014)</a> and the <a href="#">Planning Practice Guidance webpage</a>. 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. 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> 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> The LLFA utilises Environment Agency flood risk information – this information is open source and available <a href="https://flood-map-for-planning.service.gov.uk/long-term-flood-risk">information.service.gov.uk/long-term-flood-risk</a> by entering property details. It is the LLFA’s statutory role to respond to flooding incidents caused from Surface Water and/or an Ordinary Watercourse. To report a flooding incident, please visit the council <a href="#">website</a> for guidance and for the council’s flood reporting form. Flooding from a main river, a reservoir or coastal water requires reporting to the environment agency; please see the council’s website for further <a href="#">guidance</a>.</p> <p><b>POLICY G2: Design (page 25)</b> - “f) Development should incorporate sustainable design and construction</p>	<p>Noted. The proposed words will be</p>	<p>Change to be made as</p>
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	Page 25	G2		<p>techniques to meet high standards for energy and water efficiency. Dwellings should be built with rainwater recycling to both front and rear of property. Property frontages must also have either lawns or gardens to avoid water run-off from hard standing; g) Development should incorporate sustainable drainage systems with maintenance regimes to minimise the risk of flooding and the effects of climate change”</p> <p>☐ The LLFA supports the use of Sustainable Drainage Systems (SuDS) (including but not limited to rain water recycling) in all developments (where possible) and advises planning applications to adhere to the national planning policy framework – as stated in the NPPF 165 – “Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should:</p> <ol style="list-style-type: none"> <li>a) take account of advice from the lead local flood authority;</li> <li>b) have appropriate proposed minimum operational standards;</li> <li>c) have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development; and</li> <li>d) where possible, provide multifunctional benefits.”</li> </ol> <p>The LLFA supports Policy G2 point g. The LLFA would like to refer to the NPPF 163  – When considering policy G2 point g. it states that:  “When determining any planning applications, local planning authorities should ensure that flood risk is not increased elsewhere. Where appropriate, applications should be supported by a site-specific flood-risk</p>	<p>incorporated into the text. As the policy is intended to apply to all development and not just ‘major developments’ as described in the NPPF , the use of the words ‘where possible’ is an essential addition.</p> <p>We will refer to para 165 but not repeat it as it is national planning policy that will be taken into account in determining planning applications. The NP does not need to repeat this national requirement.</p>	<p>indicated.</p> <p>Change to be made as indicated.</p>
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			<p>assessment. Development should only be allowed in areas at risk of flooding where, in the light of this assessment (and the sequential and exception tests, as applicable) it can be demonstrated that:</p> <ul style="list-style-type: none"> <li>a) within the site, the most vulnerable development is located in areas of lowest flood risk, unless there are overriding reasons to prefer a different location;</li> <li>b) the development is appropriately flood resistant and resilient it incorporates sustainable drainage systems, unless there is clear evidence that this would be inappropriate;</li> <li>c) any residual risk can be safely managed; and</li> <li>d) safe access and escape routes are included where appropriate, as part of an agreed emergency plan.”</li> </ul>		
	Page 54	ENV 8	<p><b>POLICY ENV 8: Biodiversity Protection In New Development (page 54)</b> “Sustainable Drainage and landscaping schemes should be designed to incorporate measures for habitat creation and biodiversity enhancement and should include a resourced management plan to maintain the designed biodiversity value of these features.”</p> <ul style="list-style-type: none"> <li>☒ The LLFA Encourages the use of sustainable drainage on all developments (where appropriate).</li> </ul>	Noted	None
	Page 56		<p><b>Flood risk (page 56)</b> - “This Policy deals with the issue of flood risk within the powers of a Neighbourhood Plan. It requires new development to take flood risk, current and future, into account in their proposals for mitigation, both on the development site and more widely in the Plan Area.” The LLFA strategy, in line with the NPPF, states that “All development should not increase flood risk elsewhere and should mitigate flood risk on site.” The LLFA would like to reiterate its statutory consultee function with regard to planning applications. Leicestershire County</p>	Noted. This is an issue for the Borough Council at planning application stage.	None

			<p>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 that falls under the remit of consultation by the LLFA properly mitigates flood risk with an appropriate surface water drainage strategy, incorporating Sustainable drainage Systems (where possible), and adheres to both the Approved Document H - Drainage and Waste Disposal and the national planning policy framework. Please refer to our “Surface water drainage for developments” website for <a href="#">guidance</a>.</p> <p>The LLFA holds location specific information on Sileby CP, including flood risk (pluvial flooding) and two incidents in addition to the fluvial flood risk already outlined within the neighbourhood plan. The LLFA holds the following incident reports occurring in Sileby CP on its records:</p> <ol style="list-style-type: none"> <li>1. The LLFA Holds one record of flooding to road, field and public footpath preventing access on Barrow Road (and surrounding areas), Sileby (2018).</li> <li>2. The LLFA holds one record of Internal and External Property Flooding on Highgate Road, Sileby (2012).</li> </ol> <p>The below map shows the risk of flooding from surface water for Sileby CP. The risk of flooding from surface water map indicates low risk – between 0.1 and 1% chance of flooding (1 in 1000), medium risk – between 1 and 3.3% chance of flooding (1 in 100) and high risk – greater than 3.3% chance of flooding (1 in 30).</p> <p>In accordance with the NPPF, Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk (whether existing or future).</p> <p>The LLFA’s flooding records are maintained and updated</p>		
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	Page 57	ENV 10	<p>based on flooding incidents reported to the authority by a range of stakeholders. The above may not be an exhaustive list of flooding incidents in the area. Local and parish councils may hold further information in relation to the flooding history of the area. Flood risk mapping (such as that used in the above map) is readily available for public use at the links below.</p> <p>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> 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><b>POLICY ENV 10: Managing Flood Risk (page 57)</b> - All development in the Plan Area will be required to demonstrate that:</p> <ul style="list-style-type: none"> <li>• The risks of all types of flooding have been considered and quantified</li> <li>• For the lifetime of the development the development itself and its occupants are safe from the effects of flooding</li> <li>• It does not increase the risk of flooding elsewhere</li> <li>• Its design includes, as appropriate, sustainable drainage systems (SUDS)</li> <li>• The LLFA approves of Policy ENV 10 and would once again like to refer to the national planning policy framework (165). As stated in the NPPF 165):  <i>“Major developments should incorporate sustainable drainage systems unless there is clear evidence that this would be inappropriate. The systems used should: a) Take account of advice from the lead local flood authority;</i>  <i>b) Have appropriate proposed minimum operational standards;</i></li> </ul>	<p>Noted. It is not felt necessary to refer to national planning policy which will automatically be taken into account in determining any planning applications.</p> <p>Noted. We will add in to the policy reference to</p>	<p>None</p> <p>Change to be made as</p>
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	Page 77	E 2		<p>c) <i>Have maintenance arrangements in place to ensure an acceptable standard of operation for the lifetime of the development and;</i></p> <p>d) <i>Where possible, provide multifunctional benefits”.</i></p> <p><b>POLICY E 2: Farm Diversification (page 77)</b> - “The re-use, conversion and adaptation of rural buildings and well-designed new buildings for commercial use will be supported where it: d) There is no significant adverse impact on neighbours – e.g. through noise, light or other pollution, increased traffic levels or flood risk.”</p> <p>☑ The LLFA supports POLICY E 2: Farm Diversification (p 77) where support is only given to re-use of rural buildings where flood risk is not increased. Redevelopments and developments are expected to provide a betterment to flood risk where possible. Furthermore, in accordance with LLFA strategy, brownfield site surface water run off rates should be as close to the pre-development (greenfield) rate as possible.</p> <p><b>Planning advice</b></p> <p>It is noted that within the drainage strategy for most brownfield sites there is a reduction from the current surface water disposal rate however, priority must be given to SuDS as per National Planning Policy Framework (NPPF). There is an increasing trend for brownfield sites to submit drainage strategies that rely too heavily on underground storage options. The LLFA does not identify underground storage as drainage that is considered as sustainable. Sustainable drainage systems should seek to improve water quality, amenity and biodiversity, in addition to flood risk. Unless explicitly demonstrated as not practicable or achievable on a proposed development, the LLFA would expect surface water stored below the ground to be discharged at the greenfield rate,</p>	<p>‘brownfield site surface water run off rates should be as close to the pre-development (greenfield) rate as possible’.</p> <p>Noted</p> <p>Noted. There are no allocations within the neighbourhood plan that would require an immediate contribution to infrastructure. As and when the reserve sites</p>	<p>indicated.</p> <p>None</p> <p>None</p>
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			<p>by providing betterment by upsizing the storage volume. The LLFA would not be in a position to recommend planning approval if below ground storage, with a higher than greenfield discharge rate, is the only option included within a drainage strategy.</p> <p><b>Planning</b>  <b>Developer Contributions</b>  The Sibley Draft NP has no specific policy or explanatory text to requirements for developer contributions or suitable provision of 'financial or non-financial' contributions to ensure that any impacts from new development are properly funded by the developers to ensure suitable provision is made for local services and infrastructure.</p> <p>It would be prudent to consider the inclusion of a 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.  <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>  <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> <p><b>Mineral &amp; Waste Planning</b>  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</p>	<p>come forward because of an increase in housing need, this will be addressed according to the circumstances at the time.</p> <p>These general comments are noted.</p>	<p>None</p>
			<p><b>Mineral &amp; Waste Planning</b>  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</p>	<p>These and the following</p>	<p>None</p>

			<p>makes decisions on mineral and waste development.</p> <p>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.</p> <p>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 <a href="#">Leicestershire Minerals and Waste Plan</a>. These proposed safeguarding areas and existing Mineral Consultation Areas are there to ensure that non-waste and nonminerals 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.</p> <p><b><u>Education</u></b></p> <p>Whereby housing allocations or preferred housing developments form part of a Neighbourhood Plan the Local Authority will look to the availability of school places within 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.</p> <p>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</p>	<p>general comments are noted.</p>	
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			<p>that sufficient places are available in good schools within its area, for every child of school age whose parents wish them to have one.</p> <p><b><u>Property</u></b></p> <p><b><u>Adult Social Care</u></b> It is suggested that reference is made to recognising a significant growth in the older population and that 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 by the lack of suitable local options.</p> <p><b><u>Environment</u></b> 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.</p> <p><b><u>Climate Change</u></b> 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.</p>	<p>Policy H3 addresses the needs of older people.</p> <p>Noted. The NP incorporates significant levels of environmental protections</p> <p>Noted. The NP incorporates significant levels of environmental protections</p>	<p>None</p> <p>None</p> <p>None</p>
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			<p><b>Landscape</b></p> <p>The County Council would like to see the inclusion of a local landscape assessment taking into account 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.</p> <p><b>Biodiversity</b></p> <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 a 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> <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 Special Scientific Interest); locally designated</p>	<p>Noted. The NP incorporates significant levels of environmental protections</p> <p>Noted. The NP incorporates significant levels of environmental protections.</p>	<p>None</p> <p>None</p>
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			<p>Wildlife Sites; locations of badger setts, 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 programmed.</p> <p>Contact: <a href="mailto:planningecology@leics.gov.uk">planningecology@leics.gov.uk</a>, or phone 0116 305 4108</p> <p><b>Green Infrastructure</b> 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> <p>The NPPF places the 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 &amp; enhancing new networks and this assessment</p>	<p>Noted. The NP incorporates significant levels of environmental protections.</p>	<p>None</p>
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			<p>can then be used to inform CIL (Community Infrastructure Levy) schedules, enabling communities to potentially benefit from this source of funding.</p> <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> <p><b>Brownfield, Soils and Agricultural Land</b></p> <p>The NPPF encourages the effective use of brownfield 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.</p> <p>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.</p>	<p>Noted. The NP identifies suitable development on brownfield sites in the Parish.</p>	<p>None</p>
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			<p>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.</p> <p><b>Impact of Development on Civic Amenity Infrastructure</b> 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 offset 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.</p> <p><b><u>Communities</u></b> 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. Neighbourhood Plans provide an opportunity to;</p> <ol style="list-style-type: none"> <li>1. Carry out and report on a review of community facilities, groups and allotments and their importance with your community.</li> </ol>	<p>Noted. This will be a matter for CBC at planning application stage.</p> <p>Noted. The NP contains significant protection of community facilities and a mechanism through a range of community actions to deliver community projects.</p>	<p>None</p> <p>None</p>
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			<p>2. Set out policies that seek to;</p> <ul style="list-style-type: none"> <li>• protect and retain these existing facilities,</li> <li>• support the independent development of new facilities, and,</li> <li>• identify and protect Assets of Community Value and provide support for any existing or future designations.</li> </ul> <p>3. Identify and support potential community projects that could be progressed.</p> <p>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>.</p> <p><b><u>Economic Development</u></b> 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.</p> <p><b><u>Superfast Broadband</u></b> High speed broadband is critical for businesses and for access to services, many of which are now online by default. Having a superfast broadband connection is no longer merely desirable, but is an essential requirement in ordinary daily life.</p> <p>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</p>		<p>The Plan does incorporate economic development aspirations through appropriate policies.</p> <p>The NP has a policy on broadband</p>	<p>None</p> <p>None</p>
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				<p>phase and should engage 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.</p> <p><b><u>Equalities</u></b>  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 view at: <a href="http://www.leicestershire.gov.uk/sites/default/files/field/pdf/2017/1/30/equalitystrategy2016-2020.pdf">www.leicestershire.gov.uk/sites/default/files/field/pdf/2017/1/30/equalitystrategy2016-2020.pdf</a></p> <p><b>NIK GREEN (MRS)</b>  Policy Officer  </p>	Noted.	None.
9			CBC	<p><b><u>Sileby Neighbourhood Plan 2018 – 2036 Pre-Submission Version (November 2018)</u></b></p> <p><b><u>Charnwood Borough Council Comments – January 2019</u></b></p> <p>Thank you for providing Charnwood Borough Council with an opportunity to comment on the Sileby Neighbourhood Plan Submission Version (November 2018). As the plan is at the pre-submission consultation stage the comments focus on the conformity with the Charnwood Local Plan Core Strategy 2011 – 2028 (the Core Strategy) and the National Planning Policy Framework (NPPF). There are also two separate sections ‘general observations and policy specific observations’ which provides comments which are only intended to be helpful to the plan making process. We would welcome ongoing engagement with</p>	Noted	None

			<p>the Neighbourhood Plan Advisory Committee as preparation of the plan moves forward.</p> <p><b><u>Charnwood Local Plan Conformity</u></b></p> <p>The Sileby Neighbourhood Plan must be in general conformity with the strategic policies of the development plan if it is to meet the basic conditions test. The Core Strategy was adopted on the 9<sup>th</sup> November 2015 and provides the strategic policies for delivering growth in the Borough. The Neighbourhood Plan must be in general conformity with this document as well as the NPPF and Planning Practice Guidance.</p> <p>The following points have been identified as areas where this general conformity may not be met:</p> <p><b><u>Policy G2 – Design</u></b></p> <p>Policy G2 (a) sets out that ‘proposals should clearly show within a Design and Access Statement how the general character, scale, mass, density and layout of the site is sympathetic to any neighbouring properties and the surrounding area’. It is important to note that a design and access statement is not required in all instances unless the application is for major development, for development in a designated area where the proposed development consists of one or more dwellings or a building or buildings with floorspace of 100 square metres or more, or is an application for listed building consent (Planning Practice Guidance ‘making an application’, paragraph 30). Criteria (a) could be made more robust by setting out in which circumstances a design and access statement is required.</p> <p>PROPOSED ACTION: reword policy G2 to accord with the Planning Practice Guidance.</p>	<p>Noted</p> <p>Noted. We will add in ‘where appropriate’ after ‘design and access statement’</p> <p>It is not felt necessary to list all circumstances in which a design and access statement is required as this is covered in national policy.</p> <p>Agreed. As above.</p>	<p>None</p> <p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p>
	G2				
	H4				

		ENV6	<p><b><u>Policy H4 – Affordable Housing</u></b></p> <p>Policy H4 states that, ‘to meet identified needs within the community at least 30% of all new housing developments of 11 units or more will be high quality affordable housing’. Paragraph 63 of the NPPF states provision of affordable housing should not be sought for residential developments that are not major developments. Annex 2 ‘Glossary’ of the NPPF sets out that ‘major development’ is defined as ‘ten or more homes’. To ensure consistency with the NPPF, Policy H4 needs to be updated to refer to ‘10 units or more’ to reflect this. PROPOSED ACTION: reword policy H4 to accord with the NPPF.</p>	Agreed. The policy will change the threshold from 11 to 10.	Change to be made as indicated.
			<p><b><u>Policy ENV6 – Biodiversity, Hedges and Habitat Connectivity</u></b></p> <p>The policy as it is currently worded is more restrictive than that advocated in Policy CS13 Biodiversity and Geodiversity in the Core Strategy and by the NPPF. Policy ENV6 states that development proposals which result in the loss of hedges of historical and ecological significance will be resisted. In exceptional circumstance the Core Strategy and NPPF make provision for development which results in significant harm to biodiversity where the benefit of development outweighs the impact and provided it can be adequately mitigated, or, as a last resort compensated for. PROPOSED ACTION: Reword policy ENV6 to accord with the NPPF and Core Strategy Policy CS13 to provide some flexibility to the policy.</p>	Agreed. The policy will be amended to say ‘Development proposals which result in significant harm to biodiversity will be resisted unless the benefit of development outweighs the impact and provided it can be adequately mitigated, or, as a last resort compensated for’.	Change to be made as indicated.
		ENV 11	<p><b>Policy ENV11</b> Renewable Energy Generation Infrastructure Policy ENV11 (b) makes provision for wind turbine proposals only if the turbine tip height is less than 25 metres and the proposals is for no more than one turbine.</p>	Suggest a rewording of the policy to make it easier to apply as follows: ‘Proposals for small-scale	Change to be made as indicated.

			<p>The policy is fairly restrictive and does not allow the same flexibility which is provided for by Policy CS 16 Sustainable Construction and Energy of the Core Strategy and the NPPF. Policy CS 16 and the NPPF make provision for granting permission for wind farms if a number of criteria are met namely that ‘the development site is an area identified as suitable for wind energy’ and that ‘following consultation it can be demonstrated that the planning impacts identified by the local communities have been fully addressed and therefore the proposal has their backing’. Robust evidence will be needed to underpin this aspect of the policy as to why wind turbines will only be supported if they meet specific criteria.</p> <p>PROPOSED ACTION: Reword Policy ENV11 to ensure consistency with the NPPF and Core Strategy Policy CS16 Sustainable Construction and Energy.</p> <p><b>General Observations</b> The plan is well-written and easy to read. The following points are intended to be helpful in the spirit of cooperation and are not made as objections to the draft Neighbourhood Plan.</p> <p><b>Evidence base</b> Robust justification and evidence will be required to support policies and defend them at examination. It was encouraging to see a range of supporting evidence advertised alongside the pre-submission consultation on the neighbourhood plan website. A lack of evidence may result in difficulties at examination and could lead to the deletion of policies.</p> <p><b>Wording of policies</b> Care should be taken to ensure that policies are precisely worded and easily understandable to ensure that the</p>	<p>renewable energy generation and energy storage facilities will be considered favourably, on their merits, providing that conditions regarding habitats and species, heritage assets, landscape character, noise and visual impact are in place.</p> <p>Noted. Thank you for this comment.</p> <p>Noted.</p> <p>Noted. Amends to the NP policies will be made</p>	<p>None</p> <p>None</p> <p>Change to be made as</p>
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			<p>policy's intent is understood and delivered as intended through development which occurs on the ground.</p> <p><b>Repetition of Core Strategy Policies</b> The Neighbourhood Plan forms part of the development plan, giving a local perspective to strategic policies. It is not necessary to replicate policies which are provided through the NPPF or Charnwood Local Plan.</p> <p><b>Maps</b> The maps in the neighbourhood plan are of a small scale meaning that it is often difficult to establish what they are illustrating. It might be prudent to make them full scale so that their intention and use in the document is clear.</p> <p><b>Policy Specific Observations</b> <b>Policy G1 – Limits to development</b> The neighbourhood plan proposes to designate a 'limits to development' for the village which would update and supersede the existing settlement limits currently used by Charnwood Borough Council in the Charnwood Settlement Limits to Development Assessment 2018 (CSLDA). A methodology has been included to show how the limits to development have been determined. It is entirely appropriate for the neighbourhood plan to define its own limits to development and the inclusion of a methodology is welcomed however; the supporting evidence will need to set out how the methodology has been derived and we would welcome consistency with the principles and methodology set out in the CSLDA.</p> <p><b>Policy G2 – Design</b> Policy G2 (b) notes that the conservation area design principles should be applied where a development is</p>	<p>where required.</p> <p>Noted</p> <p>Noted. The maps will remain in the NP for illustrative purposes but will be accompanied by high-resolution versions in the evidence base.</p> <p>Noted. We will include a reference to the CSLDA.</p> <p>Noted. The policy says that design 'should' be</p>	<p>indicated, where appropriate.</p> <p>None</p> <p>None</p> <p>Change to be made as indicated.</p> <p>None.</p>
		G1			
		G2 (b)			

		G2 (c)	<p>adjacent to the conservation area. Conservation area policies only apply within the conservation area itself therefore it would be difficult to extend these beyond its boundary. However, this does not mean that policy G2 (b) cannot set out a clear design vision and expectation so that applicants have as much certainty as possible about what is likely to be acceptable for proposed developments adjacent to the conservation area boundary.</p> <p>Policy G2 (c) sets out minimum car parking standards for new residential development. It is noted that these standards are higher than the standards set out in Leicestershire County Council's Leicestershire Highway Design Guide for developments of 1 to 5 houses (paragraph 3.174). For developments over 5 dwellings the Guide would expect the DCLG paper method to be applied (paragraph 3.175). The car parking standards in the neighbourhood plan need to be supported by robust evidence which sets out the methodology, rationale and justification for how the standards have been devised. Advice should also be sort from the highways authority who will be able to provide further guidance on car parking standards.</p> <p>The neighbourhood plan should also take account of paragraph 105 of the NPPF which notes that if a plan sets out local parking standards for residential and nonresidential development, policies should take into account: the accessibility of the development; the type, mix and use of development; the availability of and opportunities for public transport; local car ownership levels; and the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.</p> <p><b>Setting a Housing Growth Target for Sileby</b></p>	<p>applied in areas adjacent to the Conservation Area. It is not an absolute requirement but something to bear in mind.</p> <p>The parking situation in Sileby is particularly bad. We wish to secure enhanced parking standards to reflect this.</p>	<p>None</p> <p>Change to be</p>
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	Page 27		<p>The section 'Setting a Housing Growth Target for Sileby' (page 27), sets out a housing growth target for Sileby including a methodology which it states has been agreed with Charnwood Borough Council. Whilst this is correct, it should caveated that this figure would not predetermine any housing requirement figure identified through the Local Plan plan-making process and that the overall figure for Sileby neighbourhood area may change depending on the outcome of the Local Plan evidence. The Borough Council is still working towards setting an overall housing requirement figure for the Borough and is yet to determine a development strategy for the distribution of this housing. However, as a Service Centre, Sileby will almost certainly be identified as a location for further housing provision.</p>	the text but a specific acknowledgement will be made.	made as indicated.
	Page 27		<p>The methodology (page 27) makes provision for a windfall allowance of 7 dwellings per annum over the neighbourhood plan period. This figure forms an integral part of the overall housing target and will need to be underpinned by robust evidence as to how it was determined. Paragraph 70 of the NPPF notes that where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. The second paragraph on page 29 sets out that the housing target for Sileby is 622 dwellings over the neighbourhood plan period. It could be made clearer how this figure was produced, what this means for the residual target and housing target overall for example – 'a housing target of 566 dwellings has been identified for Sileby however, including planning approvals (since April 2017) and the windfall allowance the actual projected number</p>	Noted. The section will be strengthened to address these issues.	Change to be made as indicated.

			<p>of dwellings is 622. This leaves a residual of minus 56 dwellings meaning that the housing target for Sileby has already been exceeded’.</p> <p><b>Policy H1 – Reserve Sites</b>  Policy H1 makes provision for six reserve housing sites which will be considered for residential development if there is a shortfall in the supply of housing land due to the failure of existing housing sites to deliver homes or if it becomes necessary to provide for additional homes in the Parish in accordance with the new Local Plan. The approach of identifying reserve sites is a pragmatic means of addressing the uncertainty of the housing requirement and provides a means to tackle any increase in the requirement should it arise as the new Local Plan progresses. It is noted that Appendix 3(d) sets out the selection process for the sites.</p> <p><b>Policy H2 – Windfall Development</b>  The supporting text states that the Charnwood Strategic Housing Land Availability Assessment excludes all sites of 5 and under. The SHELAA actually notes that sites which are capable of providing 5 or more houses are included in the assessment. This is also in line with Planning Practice Guidance ‘Housing and Economic Land Availability Assessment’ paragraph 10. We would suggest that the text is amended to ‘excludes sites of less than 5 dwellings’ to reflect this.</p> <p>Policy H2 makes reference to ‘proposals of up to 5 units’. This should read ‘less than 5 units’. Whilst there is no specific guidance on what scale of development is suitable for a windfall site, the NPPF (paragraph 68) notes that small and medium sized sites can make an important contribution to meeting the housing requirement of an area and that local planning authorities, amongst other</p>	<p>Noted.</p> <p>Noted.</p> <p>Agreed. We will amend the windfall policy to reflect development up to and including 9 dwellings.</p>	<p>None</p> <p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p>
	H1				
	H2				
	H2				

			<p>things, should support the development of windfall sites through their policies and decisions. Appendix 2 of the NPPF notes that ‘major developments’ are those which consist of ten dwellings or more, therefore one could quite reasonably make the assumption that small and medium sized site would include developments up to and including 9 dwellings. The policy as written could prove quite restrictive in its application and may result in slightly larger sites (up to and including 9 dwellings) being excluded from consideration. The rationale for including a size limit for windfall sites in the policy needs to be fully justified.</p> <p><b>Policy H3 – Housing Mix</b>  The strategic context for policy H3 is provided by Policy CS3 Strategic Housing Needs in the Core Strategy. The approach set out in the policy is supported however, there is potential to provide more detail to H3 (a) by listing specifically the type of housing needed in Sileby. This could be done by merging (a), (b) and (c) which would provide more clarity to the policy and will ensure consistency with paragraph 61 of the NPPF. The evidence which underpins this policy is provided in Annex 3(c) Sileby Housing Needs Report.  The text under (d) could be made in to a separate point and could be used to provide more clarity on specific locations on where a certain type of housing is needed for example bungalows centrally located in Sileby.</p> <p><b>Policy H4 – Affordable Housing</b>  The wording of Policy H4 is slightly confusing. It notes that ‘to meet identified needs within the community at least 30% of all new housing developments of 11 units or more will be high quality affordable housing. The provision of affordable housing through Starter Homes (around 30%) or Shared Ownership schemes (around</p>		
		H3		<p>We will amend the policy to say ‘development proposals should seek to create sustainable, inclusive and mixed communities by providing a mix of house types and size that reflect up to date evidence of local need’.</p>	<p>Change to be made as indicated.</p>
		H4		<p>Noted.</p> <p>The policy will be reworded to incorporate rental options.</p> <p>Reference will also be</p>	<p>Change to be made as indicated.</p>

		ENV2	<p>30%) will be particularly supported subject to a registered provider being prepared to deliver the units, as there is an under provision of owner-occupied housing in the Parish'. Please note the issue of conformity raised earlier with regards to '11 units or more'. The policy sets out that 30% of all new housing will be affordable housing which is consistent with Policy CS 3 Strategic Housing Needs in the Core Strategy. The policy then sets out affordable housing tenure mix (starter homes and shared home ownership schemes) but fails to make reference to 'social or affordable rent' which is mentioned in the supporting text on page 33. The policy needs to be reworded to ensure all affordable housing tenure is referred to. It is also important to note that the NPPF (paragraph 64) requires that planning policies and decisions should expect at least 10% of the homes to be available for affordable home ownership (with a number of exceptions). Alternative mixes can be considered as long as the need to meet the objectively assessed needs of the community and the need for flexibility to avoid delays to the delivery of housing is balanced. Please consider the NPPF requirements on tenure in finalising this policy. The policy sets out that when affordable housing is being allocated, priority will be given to people with a local connection to Sileby. It should be noted that all people who require housing across the Borough are assessed in accordance with the Borough Council's Housing Allocation Policy. The Neighbourhood Plan should therefore be mindful of the Housing Allocation Policy.</p> <p><b>Policy ENV2 – Protection Sites of Environmental Significance</b>  The strategic context for policy ENV2 is provided by policies Policy CS 13 Biodiversity and Geodiversity and Policy CS14 Heritage. The policy as worded could be restrictive in its application</p>	<p>made to the CBC Housing Allocation Policy (by saying that priority within bands of housing need will be given to people with a local connection.</p> <p>Will replace 'other than exceptional circumstances' with 'the need for and benefits arising from development</p>	<p>Change to be made as indicated.</p>
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			<p>and further clarity should be provided to make it clearer under which ‘exceptional circumstances’ development proposals will be considered.</p> <p><b>Policy ENV4 – Built Environment Non-Designated Heritage Assets</b>  Policy ENV4 lists twenty non-designated local heritage assets which are welcomed. Further robustness could be given to the policy by setting out how the local heritage assets will be conserved and enhanced and under which circumstances development proposals would be considered acceptable. This would ensure consistency with Policy CS 14 Heritage of the Core Strategy.</p>	<p>adequately outweigh/compensate their damage/loss’</p> <p>Agreed. Will add in to the policy ‘Development proposals that affect an identified non-designated building or structure of local historical or architectural interest or its setting will be expected to conserve or enhance the character, integrity and setting of that building or structure’.</p>	<p>Change to be made as indicated.</p>
		ENV7	<p><b>Policy ENV7 – Protection of Important Views</b>  The policy as written is fairly ambiguous. Further clarity could be provided to Policy ENV7 by setting out detailed guidance on the ‘exceptional circumstances’ under which ‘development which adversely impacts on the identified locally important and valued views’ would be considered acceptable. This would ensure consistency with Core Strategy Policy CS 11 Landscape and Countryside and that the policy is clear in its application.</p>	<p>Will change policy to ‘Development proposals must consider, assess and address, with mitigation where appropriate their impact on the important views listed below and illustrated in figure 15’.</p>	<p>Change to be made as indicated.</p>
		ENV8	<p><b>Policy ENV8 – Biodiversity Protection in New Development</b>  Policy ENV8 repeats some of the wording in Policy G2 Design for example ‘roof and wall construction should follow current technical best practice’, ‘hedges should be used for property boundaries to maintain connectivity of habitat for hedgehogs’ and ‘security lighting should be operated by intruder switching, not constantly on’. The repeated wording should be deleted and amalgamated in</p>	<p>Agreed</p>	<p>Change to be made as indicated.</p>



			<p>sentence on page 68. These two terms mean different things and it is important to distinguish between the two. Parking on a pavement is not illegal unless parking restrictions are in force in that particular area.</p> <p><b>Policy CF6 – Parks and Play Areas</b>  Policy CF6 requires that the enhancement of existing play provision is supported in preference to the creation of new small play areas. This policy is potentially contradictory and may mean that where new parks and play areas are required to make a development acceptable in planning terms, that the development would not be permissible under the terms of this policy. This policy should be reworded to allow more flexibility in its application.</p> <p><b>Policy T2 – Road Network</b>  Policy T2 sets out that development proposals will not be supported if there would be an unacceptable impact on highway safety or if the cumulative impact of additional traffic on the local highway network is severe, unless appropriate mitigation measures are undertaken that contribute to off-site improvements to the highway network to mitigate the effects of increased traffic from the new development.</p> <p>Taking into account the cumulative transport impact of a development could mean that a proposal ends up contributing to mitigation measures which are not directly related to; and not fairly or reasonably related in scale and kind to the development itself. It might be prudent to reword the policy to require contributions to mitigation measures of an appropriate scale directly related to the size of the new development and its location.</p> <p><b>Policy T6 – Canal</b></p>	<p>Will add in 'where permissible'</p> <p>Agreed. Will add in 'contributions to mitigation measures of an appropriate scale directly related to the size of the new development and its location'.</p>	<p>Change to be made as indicated.</p> <p>Change to be made as indicated</p>
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	Page 30  Page 31  Page 63	T6   H1 (b)		<p>Policy T6 provides a policy framework for the protection and enhancement of the Grand Union Canal. Policy CS 12 Green Infrastructure of the Core Strategy includes a policy on the Grand Union Canal. It is not for the neighbourhood plan to repeat Core Strategy policies, however, the neighbourhood plan policy could be reworded to allow more flexibility for the types of proposals which might be acceptable along the Grand Union Canal.</p> <p><b><u>Other Comments</u></b> Page 30 – Policy H1 (b) should read ‘Charnwood Local Plan Core Strategy’.</p> <p>Page 31 – Paragraph one should read the ‘Charnwood Strategic Housing and Employment Land Availability Assessment’.</p> <p>Page 63 Health and Wellbeing. First paragraph ‘have restricted planning’ should be ‘have restricted parking’.</p> <p><b><u>COMMENTS END</u></b> We would be more than happy to explain further any of the comments made above and consider alternative wording to overcome any issues raised</p>	<p>It is considered that the policy meets the Basic Conditions</p> <p>Noted. These amendments will be made.</p> <p>Thank you – this has been a very helpful response to the regulation 14 consultation.</p>	<p>None</p> <p>Change to be made as indicated</p> <p>None</p>
10			Barwood Development Securities Ltd	<p><b>RE: SILEBY NEIGHBOURHOOD PLAN PRE-SUBMISSION CONSULTATION JANUARY 2019. PHASE 2 LAND AT PEASHILL FARM, SILEBY.</b></p> <p>On behalf of our client Barwood Development Securities Ltd., we wish to make the following objections to the above consultation document. Our client has an interest in land at Peashill Farm, Sileby, shown outlined in red on the plan attached at Appendix 1. We consider this land to be eminently suitable, achievable and deliverable for</p>	<p>Noted</p>	<p>None</p>

	Pages 27-30	H1		<p>sustainable residential development of approximately 150 dwellings, as a second phase of development following the grant of planning permission in 2018 for Phase 1, comprising 170 dwellings. We also attach, at Appendix 2, a concept masterplan showing how the Phase 2 land could be developed.</p> <p><b>Housing and the Built Environment and Policy H1 (pages 27 – 30 of the Plan).</b></p> <p>We note that Charnwood BC has failed to provide a specific indicative housing requirement figure to inform the Plan, yet there is no explanation as to why this is, despite the requirement in Planning Practice Guidance that this should be the case “only in exceptional circumstances”. We consider there are no such exceptional circumstances and that the Plan should not proceed until an indicative housing figure has been provided by the Council.</p> <p>In the absence of an indicative housing figure, the conclusions reached in the Plan are that no new housing allocations are required for the period 2018 – 2036 and that it is sufficient simply to identify six relatively small, commercial brownfield sites as ‘reserve sites’ which could accommodate a total of only 77 dwellings, if indeed they are required at all.</p> <p>We disagree with and object to these conclusions, and Policy H1 which flows from them.</p> <p>Instead, we consider that a significant number of new dwellings are required in Sibley over the plan period and that our client’s site, described above, should accordingly be allocated in the Plan for approximately 150 new homes, or at the very least be identified within Policy H1 as an additional ‘reserve site’, for the following key</p>	<p>The issue of the housing target has been addressed by a mutually agreed methodology. The NP accepts that should the final figure increase prior to the submission of the NP, this will be reflected in the narrative. Meanwhile, the NP provides for a significant number of reserve sites to accommodate any increase in housing should the final agreed figure be greater than the level agreed for the purposes of preparing the NP.</p> <p>The methodology has been agreed with the local planning authority, who consider it to be an appropriate approach.</p>	<p>None</p> <p>None</p>
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			<p>reasons.</p> <ol style="list-style-type: none"> <li>1. We support the option set out in <b>Charnwood BC's 'Towards a Local Plan for Charnwood'</b> consultation undertaken in 2018, for a higher growth scenario, providing for an additional minimum of 15,700 homes up to 2036, over and above existing commitments and based on the HEDNA 2017 which identifies a need for a minimum of 994 dwellings per annum (dpa) in the borough. This option rightly acknowledges that not all the homes in Charnwood which already have planning permission and/or are allocated in the adopted Core Strategy will be built by 2036. This is due particularly to the lengthy delays experienced in delivering any new homes from the adopted Core Strategy's large Sustainable Urban Extensions (SUEs) around Leicester and Loughborough.</li> <li>2. This higher growth scenario is also reflected in the <b>Strategic Growth Plan to 2050 for Leicester and Leicestershire</b> (the final version dated September 2018, revised to take account of consultation responses to the draft prepared earlier in 2018). This Plan has been jointly prepared and agreed by all the Leicestershire planning authorities, including Charnwood, to inform emerging and future Local Plans. The Plan confirms a minimum annual housing need requirement for Charnwood of 1,031 dpa up to 2031 and indeed also sets out a requirement for minimum 994 dpa for the period to 2036, resulting in a cumulative total of at least 24,850 dwellings needed by 2036. The Plan also proposes some 38,000 new dwellings in the 'A46 Priority Growth Corridor', which includes land within Charnwood, close to Sileby.</li> <li>3. We consider that such a high growth strategy is fully in line with the NPPF requirement in paragraph 59 "to</li> </ol>	<p>The support for this option is noted but does not represent the finally agreed position.</p> <p>The overall growth figure</p>	<p>None</p> <p>None</p>
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			<p>support the Government’s objective of significantly boosting the supply of homes” and would provide the right balance to meet needs and ensure flexibility and control, thereby avoiding the Charnwood Local Plan, and consequently this Neighbourhood Plan, becoming quickly out of date - whilst also protecting the borough’s environment.</p> <p>4. We also note that the Government’s latest figures for housing need by local authority, published in September 2017, show increased housing need for Charnwood (1,094 dpa, up from 994 dpa previously) and substantially increased need for the City of Leicester (1,626 dpa, up from 1,230 – 1,330 dpa previously). Whilst the Government’s new methodology for determining housing needs is not yet finalised, the emerging Charnwood Local Plan is likely to have to plan for such increased housing needs (including accommodating some of Leicester’s additional need) and the Sileby Neighbourhood Plan must in turn be flexible enough to respond to these needs by identifying more land for new housing than it does presently.</p> <p>5. We also contend that the most sustainable approach to the distribution of these increased needs, and the one most likely to be adopted, is option 2 in Charnwood BC’s ‘Towards a Local Plan for Charnwood’ i.e. directing growth both to the urban areas of Leicester and Loughborough and to the six service centres, including Sileby. This is because:</p> <ul style="list-style-type: none"> <li>• Relying only on Leicester and Loughborough to accommodate such levels of growth is unrealistic, given that the already committed SUEs in these locations have not yet delivered housing completions;</li> <li>• Allowing smaller villages to accommodate significant</li> </ul>	<p>is a matter for the Local Planning Authority, not the NP We have agreed a figure with the LPA which is incorporated into the NP.</p> <p>As above.</p> <p>Please address these concerns to Charnwood Borough Council.</p>	<p>None</p> <p>None</p>
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	Page 28			<p>growth is not sustainable given their poor levels of services, facilities and public transport links; and</p> <ul style="list-style-type: none"> <li>• In contrast, the service centres such as Sileby have the critical mass in terms of population to support good levels of services, facilities and public transport infrastructure, which also serve many smaller, surrounding villages.</li> </ul> <p>6. We also disagree with the use of a windfall allowance of 7dpa for the whole of the 18-year plan period (a total of 126 dwellings), as the supply of windfall sites over such a long period is unpredictable. Instead, a windfall figure of some 35 dwellings (7 dpa over the first five years only) would be appropriate.</p> <p>7. In the light of all the above our position is that:</p> <ul style="list-style-type: none"> <li>• the emerging Charnwood Local Plan is now likely to have to plan for more than the 15,700 dwellings we describe in point 1 above, for the reasons given in our points 1-4;</li> <li>• we disagree with the Neighbourhood Plan’s position on page 28 that Sileby should accommodate only 4.72% of the overall Charnwood requirement, for the reasons in our point 5;</li> <li>• the gross total of new dwellings which the Neighbourhood Plan should plan for is therefore in fact higher than the 741 referred to in the second table on page 28 and substantially higher than the 566 included in the third table on page 28. The residual targets in those tables should therefore also be higher, for the same reason and</li> </ul>	<p>It is necessary to address the housing supply position over the full Plan period. It is reasonable to assume that windfall provision will continue throughout the lifetime of the NP.</p> <p>Noted. If the final figure agreed by CBC exceeds to levels allowed for, with the agreement of and following consultation with the local planning authority, then this situation will be reviewed, including a formal review of the NP if necessary.</p>	<p>None</p> <p>None</p>
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Page 29 App 3	H3			<p>also in light of our point 6 above.</p> <p>8. Arising from our above position, the Plan’s omission of any allocated housing sites and its identification of ‘reserve sites’ for only some 77 dwellings is wholly insufficient. Even if those sites are available and deliverable, which is not certain given their present use, there will still be a large shortfall against the number of new homes required and the Plan will fail to meet the requirement to achieve sustainable development.</p> <p>9. We also note that the Plan has widespread aspirations for improvements to infrastructure, services and facilities within Sibley. Yet if no new housing development is allocated the prospects of such improvements being realised are much reduced. As an example, our client’s phase 2 site at Peashill Farm would provide an opportunity to deliver a new health centre and recreational space, in addition to the community benefits already secured within phase 1, such as an open space network, play area and MUGA, allotments, cemetery expansion space, new pedestrian and cycle connections and a mixed-use local hub to potentially include community buildings and rural employment uses.</p> <p><b>Policy H3 Housing Mix</b></p> <p>We object to part b) of policy H3. The requirement for at least 60% of new dwellings to comprise 2- or 3-bedroom dwellings is over prescriptive and not supported by sufficiently robust evidence. Parts a) and c) of the policy are sufficient to meet the Plan’s objectives in this regard.</p>	<p>This opinion is noted, but not agreed.</p> <p>The identification of a number of reserve sites along with other NP policies satisfies the obligation to achieve sustainable development in an area of significant residential growth.</p> <p>Noted.</p> <p>The <b>policy to be amended to say</b> ‘development proposals should seek to create sustainable, inclusive and</p>	<p>None</p> <p>None</p> <p>None</p>
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				<p><b>Sustainable Site Assessment (SSA, page 29 and Appendix 3 of the Plan)</b></p> <p>We object to the methodology used and the findings of the SSA process, for the reasons detailed in the attached Technical Note (see appendix 3) prepared by the Environmental Dimension Partnership (EDP) which raises concern about the number of factual inaccuracies within the SSA and the absence of an adequate objective evidence base to substantiate the judgements made within it and concludes by highlighting the need for the assessment to be accurate and that judgements made should be transparent and adequately reasoned.</p> <p>We note that Charnwood Borough Council's latest <b>Strategic Housing and Employment Land Availability Assessment (SHELAA)</b>, dated December 2018, concludes at paragraph and table 10.1 that the Peashill Farm Phase 2 land (SHELAA site ref. PSH 346) is deliverable and developable for housing, with an indicative capacity of 145 dwellings.</p> <p>In our submissions to the SHELAA in June 2018 we concluded that the Phase 2 land is sustainably located and well related to the existing form and character of Sileby, as follows</p> <ul style="list-style-type: none"> <li>• our client already has planning permission for residential development (170 dwellings) of Peashill Farm Phase 1 which lies immediately adjoining the site;</li> <li>• the principle of developing in this locality has previously been accepted therefore and our client has shown a commitment to delivering high quality</li> </ul>	<p>mixed communities by providing a mix of house types and size that reflect up to date evidence of local need'</p> <p>The process that was followed was comprehensive, transparent and consistently applied. It is inevitable that there are elements of subjectivity involved, but the process followed and its conclusions have passed examination on every occasion despite fulsome objections from developers and have been judged by examiners to be proportionate and appropriate.</p>	<p>None</p>
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	App 7			<p>development in Sileby;</p> <ul style="list-style-type: none"> <li>• as well as Phase 1 to the west, there are also strong defensible boundaries to the north (Ratcliffe Road), east (an existing watercourse and field boundary) and south (existing development and field boundary);</li> <li>• the site has good accessibility in terms of the highway network, via Ratcliffe Road and the A46;</li> <li>• bus services provide connections from the site to the rest of Sileby and beyond to Leicester;</li> <li>• a new pedestrian and cycle access is being provided through Phase 1, reducing the walking and cycling distance to the centre of Sileby; and</li> <li>• the site is therefore within easy reach of the employment, retail and other services provided in Sileby, other nearby settlements and further afield in Leicester and Loughborough.</li> </ul> <p>We confirm that there are no overriding technical, environmental or ownership constraints which would preclude residential development of the site and that such development is suitable, achievable and deliverable within the next 5 years, thereby helping to meet Charnwood’s short term housing needs and sustainable growth aspirations.</p> <p><b>Transport</b></p> <p>We object to the contents of Appendix 7 entitled “Study of traffic flows in Sileby” which has informed transport and traffic matters within the plan, for the reasons detailed in the attached Technical Note prepared by PBA (see appendix 4). In summary, this technical note highlights that the conclusions reached relating to expected growth and existing capacity are unsound due to the misinterpretation of technical guidance.</p>	<p>Noted. The transport appendix describes the detailed process undertaken as part of the Plan’s preparation.</p> <p>It reflects a proportionate</p>	None
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				<p><b>Conclusion</b></p> <p>For all the reasons described in our representations, we find that:</p> <ul style="list-style-type: none"> <li>the Plan fails to adequately comply with the emerging development plan, national policy in the NPPF and the newly prepared Strategic Growth Plan for Leicestershire; and</li> <li>the Plan also fails to plan positively and to incorporate sufficient flexibility to respond to increasing housing needs and thereby achieve appropriate sustainable development.</li> </ul> <p>Accordingly, the Plan fails to meet the basic conditions required for a Neighbourhood Plan, as set out in paragraph 8 (2) of Schedule 4B to the Town and Country Planning Act 1990, as applied by section 38A of the Planning and Compulsory Purchase Act 2004.</p> <p>We therefore object to the Plan and propose that, to meet the basic conditions required, our client's site is included as an allocation for approximately 150 new homes or at the very least is identified within policy H1 as an additional 'reserve site' for housing. Alternatively, if our proposal is not accepted, the Plan should proceed no further until the position concerning future housing requirements in Charnwood becomes clearer later in 2019.</p> <p>We trust these representations are helpful at this stage and we look forward to further involvement in the consultation process over the next few months.</p>	<p>study that is reflected in the NP policies. The methodology has not been challenged by the Highways Authority.</p> <p>Noted.</p> <p>The site selection process was both thorough and comprehensive.</p> <p>NPs cannot promote less development than required by the LPA in order to meet the basic conditions, and at a time when the final figures are still to be determined, it is entirely appropriate to agree an interim position with CBC, which is what has happened to the satisfaction of the LPA.</p> <p>The Plan does not, therefore, fail to meet the basic conditions as proposed.</p>	
11			LCFC	<p><b>Sileby Neighbourhood Plan Representations – Response to Regulation 14, Town and Country Planning, England, Neighbourhood Planning (General) Regulations 2012)</b></p>		

			<p><b>Consultation</b></p> <p>This representation is made by Deloitte Real Estate on behalf of Leicester City Football Club (“LCFC”) in response to the Draft Sileby Neighbourhood Plan (“the Plan”), which is the subject of public consultation under Regulation 14 of the Neighbourhood Planning Regulations 2012 (as amended). The consultation commenced on 26 November 2018 and continues for a period of 7 weeks until 11 January 2019.</p> <p>LCFC secured planning permission in October 2018 for their new football training facility and academy at Park Hill Golf Course, which is partially located within the Plan boundary. The training centre will be one of the biggest and most advanced elite training facilities in Europe, sustaining LCFC’s sporting ambitions. Site set-up and initial enabling works are currently underway on the site, with construction expected to commence imminently. It is expected that the training centre will be operational in time for the 2019/2020 football season.</p> <p>LCFC is supportive of the vision and objectives of the Plan. Indeed, as a major new investor to Charnwood, LCFC shares the commitment to protecting and enhancing the local area. In particular, through the training facility, LCFC and the LCFC Community Trust (“the Trust”) will improve the use and integration of sports and recreational facilities through a wide range of community initiatives both on-site and as outreach in the local community. The Trust focuses on strategy, impact and development, driven by an aim to engage, inspire, and empower young people. The Trust have offered a number of highly successful community initiatives, which have reached a wide range of people across the county. In the 2016/17 season alone, the Trust’s initiatives achieved the following: 35,000+ participants; over 6,000 sessions delivered to participants</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p>
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	Page 43		ENV2	<p>locally; and engaged with over 1,000 schools (exposure c,90,000 pupils).</p> <p>LCFC would raise the following specific points with regards to the pre-submission version of the Plan:</p> <p><b>Policy ENV 2: Protection of Sites of Environmental Significance</b></p> <p>Policy ENV 2 states: <i>“The sites listed and mapped (figures 8.1, 8.2) are identified as being of local (or higher) significance for their natural and/or historical environment features. They are ecologically important in their own right, their historical features are extant and have visible expression, and they are locally valued. Development proposals which would destroy or harm the species, habitats or features occurring on these sites should not be approved other than in exceptional circumstances.”</i></p> <p>The text supporting this Policy, on Page 43 of the Plan, makes specific reference to the biodiversity significance of Park Hill Golf Course, stating the following</p> <p><i>“This extensive site, a large part of which lies in the Plan Area, has been surveyed regularly by Loughborough Naturalists Club since 1998 (Lockwood, 2012). Significant populations of great crested newts, together with smooth newts, frogs and common toads, make this a County level site for amphibians. The water bodies are also important for aquatic plants and invertebrates. The grassland is very species-rich, with a range of grasses and associated flowering plants and invertebrates (a high number of butterfly species, including several County rarities); the site is also of County importance for orchids, with colonies of green-winged, twayblade, bee and common spotted.”</i></p>	<p>Noted.</p> <p>The policy Env 2 is to be amended to reflect the need for the benefit of development to outweigh the harm.</p> <p>This is considered sufficient to allow further development of the site to take place if the benefits of that development can be demonstrated to outweigh the harm.</p>	None
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			<p>The Plan goes on to state that:</p> <p><i>“Destruction or significant harm to these sites, the loss of any of which would result in a reduction of the present already low level of biodiversity in the Plan Area, should be avoided; failure to do this would be effective non-compliance, at parish level, with the relevant sections of the Wildlife &amp; Countryside Act 1981, the Conservation of Species and Habitats Regulations 2010 and European Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora.”</i></p> <p><i>“It might be argued that parish-level biodiversity makes such a small contribution to national biodiversity that it can be ignored when individual development proposals are under consideration, but the biodiversity of England consists only of the sum of all the wildlife sites in all its parishes. Destruction of any one of these sites in Sileby will reduce national, as well as local, biodiversity. The community is determined not to contribute inadvertently to loss of wildlife through inappropriately located development proposals.”</i></p> <p>The Park Hill site has been subject to extensive survey and assessment as part of the Environmental Impact Assessment, undertaken in support of the planning application during summer 2018. This assessment was undertaken by LCFC’s ecology advisors – EDP - in close consultation with Natural England, local and County officials and local subject matter experts. Since the grant of planning permission in October 2018, EDP has been undertaking initial mitigation measures, as approved under the Planning Permission, to prepare the site for redevelopment. This has included relocation of great crested newt populations in affected ponds.</p>		
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			<p>Whilst the portion of the Park Hill site located within the boundary of the Plan is not subject to physical remodelling, with the exception of introduction of a secure fence, LCFC does hold an interest in the land.</p> <p>In EDP's professional opinion, Park Hill Golf Course Potential Site of Natural Environmental Significance has been overvalued in the Neighbourhood Plan. During 2018, EDP subjected this area to extensive surveys in order to inform LCFC's approved planning application for the creation of a new training facility on the wider golf course (Planning ref: P/18/1269/2). As documented in the Environmental Statement and Appendices supporting the application, the area in question predominantly comprises of managed amenity grassland and young plantation woodland of site level ecological value (see Plan EDP 2 d026). Higher quality habitats exist around the less managed margins of the golf course, including remnant hedgerows, mature trees, species-poor rough grassland and ponds. However, none of these habitats are considered to be valuable beyond a local context - they are not unique or uncommon across the wider landscape.</p> <p>In terms of notable or protected species, while relatively rare orchid species are present, their distribution and abundance is limited. Other species interests (e.g. birds, bats, otters, amphibians, invertebrates) are primarily associated with the locally valuable fringe habitats and not the managed golf fairways and plantation woodland that comprise the majority of the site. The ponds vary from poor to excellent condition and suitability to support great crested newts. Only two of the eight ponds identified in the area were found to support great crested newts and while the meta-population across the wider golf course is considered to be of County value, it is debatable whether the smaller population within the site itself should also be</p>		
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			<p>valued at this level given that this species is relatively common and widespread across Leicestershire.</p> <p>While recognition of the ecological value of the proposed Park Hill Golf Course Site of Natural Significance is welcomed in the Plan, it is not considered that the entire area warrants designation given that it predominantly comprises managed golf course of limited ecological value. Habitats and species of Local value are present in association with the less managed margins and these features are already afforded a level of legislative and policy protection at a borough and national level. Designating the entire area, including a high proportion of low value habitats, therefore seems disproportionate. It is recommended that the boundary is either redrawn around the locally valuable habitat features or disregarded, with existing legislation and policy relied upon to protect notable ecological interests.</p> <p><b>Policy T1: Public Car Parking</b></p> <p>The supporting text to Policy T1 described the impact of new development on the demand for car parking in Sileby, stating the following:</p> <p><i>“Increased demand for Sileby car parking will also be influenced by other new developments situated at the edge of the village, consequent upon residents from outlying villages (Quorn, Mountsorrel, Cossington, Seagrave, Walton and Rothley) accessing the Sileby shops and business and using the train station for access to Leicester, Loughborough and other destinations. In addition, possible impacts on Sileby of the major Leicester City Football Club development proposal at Park Hill Seagrave, are not yet known.”</i></p> <p>LCFC would note that a comprehensive Transport</p>		
		T1		<p>Noted. We will amend the narrative to note that LCFC are taking these issues into account through their transport assessment</p>	<p>Change to be made as indicated.</p>

				<p>Assessment was submitted as part of the Environmental Impact Assessment (EIA) and approved under the planning permission for the new training facility (Ref: P/18/1269/2). This document assessed the transport impacts of the development both during construction and operational phases. The Transport Assessment concludes that the development can be accommodated without any unacceptable detriment to the environmental effects of traffic. It is also noted that the inclusion of mitigation measures at both construction and operational phases would reduce the effects and impacts of the development further. As a condition of the Planning Permission, a Travel Plan will be submitted for the approval of the Planning Authority detailing how movements to and from the site will be managed once the development is operational.</p> <p>During the construction phase, there will be an active Construction Management Plan in place to manage vehicle movements to and from the site, including requirements that all vehicles arrive and leave via the A46 and Park Hill Lane, thereby bypassing Sileby and Seagrave entirely.</p> <p>We would request therefore that reference to the possible impacts of the training facility be removed from the Plan.</p> <p><b>Summary</b></p> <p>In summary, LCFC is supportive of the Plan, subject to the points of detail noted within this letter, and look forward to continuing to engage with the Plan process as it progresses</p>		
12			Gladman Developments	INTRODUCTION	Noted	None

			<b>Ltd</b>	<p>1.1 Context</p> <p>1 .1 .1 Gladman Developments Ltd (hereafter referred to as "Gladman") specialise in the promotion of strategic land for residential development and associated community infrastructure. From this experience, we understand the need for the planning system to deliver the homes, jobs and thriving local places that the country needs.</p> <p>1 .1 .2 These representations provide Gladman's response to the current consultation on the pre-submission version of the Sileby Neighbourhood Plan (SNP) under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012.</p> <p>1 .1 .3 Through these representations, Gladman provides an analysis of the SNP and the policy decisions promoted within the draft Plan. Comments made by Gladman through these representations are provided in consideration of the SNP's suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG</p> <p>1 .1 .4 In accordance with the Neighbourhood Plan Basic Conditions, Neighbourhood Plan policies should align with the requirements of the National Planning Policy Framework (the Framework) and the wider strategic policies for the area set out in the Council's adopted Development Plan. Neighbourhood Plans should provide a policy framework that complements and supports the requirements set out in these higher-order documents, setting out further, locally-specific requirements that will be applied to development proposals coming forward.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>
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			<p>1 .1 .5 The SNP should only be progressed if it meets the Neighbourhood Plan Basic Conditions, supported by a robust and proportionate evidence base.</p>	Noted	None
			<p>1 .1 .6 The Framework is clear that Neighbourhood Plans cannot introduce policies and proposals that would prevent sustainable development opportunities from going ahead. They are required to plan positively for new development, enabling sufficient growth to take place to meet the development needs for the area and assist local authorities in delivering full Objectively Assessed Needs (OAN) for housing. Policies that are not clearly worded or intended to place an unjustified constraint on further sustainable development from taking place are not consistent with the requirements of the Framework or the Neighbourhood Plan Basic Conditions.</p>	Noted	None
			<p>1 .1 .7 The SNP should not seek to include policies that have national and local policy obligations. Proposals should be appropriately justified by the findings of a supporting evidence base and must be sufficiently clear to be capable of being interpreted by applicants and decision-makers. Policies and proposals contained in the SNP should be designed to add value to existing policies and national guidance, as opposed to replicating their requirements.</p>	Noted	None
			<p>2.1 Legal Requirements</p> <p>2.1 .1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Basic Conditions that the BNP must meet are as follows:</p> <p>a) Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the neighbourhood</p>	Noted	None

			<p>plan;</p> <p>b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;</p> <p>c) Having regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;</p> <p>d) The making of the neighbourhood plan contributes to the achievement of sustainable development;</p> <p>e) The making of the neighbourhood plan is in general conformity with the strategic policies contained within the development plan for the area of the authority; and</p> <p>f) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations.</p> <p>g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.</p> <p>2.2 National Planning Policy Framework, &amp; Planning Practice Guidance</p> <p><i>National Planning Policy Framework</i></p> <p>2.2.1 The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements of the preparation of Neighbourhood Plans within which locally-prepared plans for housing and other development can be produced.</p>	<p>This general pre-amble is noted.</p>	<p>None</p>
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				<p>2.2.2 In 2018, the Minister of Housing, Communities &amp; Local Government (MHCLG) introduced the first changes to the Framework (the Revised Framework) which has since brought about fundamental changes to the planning system. In relation to the preparation of Neighbourhood Plans, paragraph 13 of the Revised Framework states:</p> <p>"The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies. "</p> <p>2.2.3 Further guidance on how the Presumption interacts with Neighbourhood Plans is provided in paragraph 14 of the Revised Framework.</p> <p>2.2.4 The Revised Framework sets out how neighbourhood planning gives communities the power to develop a shared vision for their area in order to shape, direct and help deliver sustainable development. However, neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies contained in higher order documents.</p> <p><i>Planning Practice Guidance</i></p> <p>2.2.1 It is clear from the requirements in the Framework that neighbourhood plan policies should be prepared in general conformity with the strategic requirements for the wider area, as confirmed in an adopted Development Plan. The requirements set out in the Framework are also supplemented by the Government's suite of Planning Practice Guidance (PPG). In relation to</p>		
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				<p>the preparation of the SNP, the PPG on Neighbourhood Planning is of particular relevance.</p> <p>2.2.2 The PPG also emphasises that;</p> <p>"... blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence"</p> <p>2.2.3 With further emphasis that;</p> <p>".. .. All settlements can play a role in delivering sustainable development in rural areas - and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence."2</p> <p>2.2.4Accordingly, the SNP will need to ensure that it takes in SOS so that it can be found to meet basic conditions (a) and (d).</p> <p>2.3 Strategic Environmental Assessment</p> <p>2.3.1 In accordance with PPG ID: 1 1-027, the preparation of Neighbourhood Plans may fall under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) that require a Strategic Environmental Assessment (SEA) to be undertaken where a Plan's proposals would be likely to have significant environmental effects.</p>		
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			<p>2.3.2 The SEA is a systematic process that should be undertaken at each stage of a Plan's preparation. It should assess the effects of a Neighborhood Plan's proposals and whether they would be likely to</p> <p><sup>2</sup> Paragraph: 044 Reference ID: 41 -044-201 6051 9 (Revised 1 9/05/201 6).</p> <p>have significant environmental effects and whether the Plan is capable of achieving the delivery of sustainable development when judged against all reasonable alternatives.</p> <p>2.3.3 The decision making and scoring of the SEA should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative. Too often SEA flags up the negative aspects of development whilst not fully considering the positive aspects which can be brought about through new opportunities for housing development and how these can influence landscape issues, social concerns and the economy.</p> <p>2.3.4 Whilst Gladman note that it is the intention to demonstrate how the SNP meets with the requirements of relevant EU legislation through the Basic Conditions statement at the Submission stage, it is currently unclear whether the SNP has been subject to SEA Screening, or whether a SEA is required in this instance. Given the nature of the SNP's proposals, Gladman suggest that there may be a requirement to undertake a full SEA to support the SNP's preparation.</p>				<p>This comment is noted. The SEA Screening process is underway.</p>	<p>None</p>
			<p>3 DEVELOPMENT PLAN</p>					

			<p>3.1 Adopted Development Plan</p> <p>3.1 .1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.</p> <p>3.1 .2 The adopted Development Plan relevant to the preparation of the Sileby Neighbourhood Plan, and the Development Plan which the SNP will be tested against, consists of the Charnwood Local Plan Core Strategy (CLPCS) (2015) and the saved policies of the Borough of Charnwood Local Plan (BCLP) (2004). The Charnwood Local Plan Core Strategy sets out the vision, objectives, spatial strategy and overarching policies to guide development in the Charnwood borough area up to 2028.</p>	<p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p>
			<p>3.2 Emerging Development Plan</p> <p>3.2. 1 Charnwood Borough Council are currently in the process of preparing a new Local Plan that will supersede the policies of the CLPCS and BCLP once adopted. The new Local Plan is being prepared in the context of the Leicester and Leicestershire Strategic Growth Plan, and will set out the overarching planning policies and development strategy for the borough up to 2036.</p> <p>3.2.2 Initial work on the Local Plan began in 2016 and an initial consultation was held in the summer of 2016 on the scope of the plan and what it should contain. A discussion paper titled 'Towards a Local Plan for Charnwood' was consulted upon in April 2018 and suggested a series of key issues and opportunities that will need to be taken into account when developing the overall strategy for delivering the growth needed in Charnwood.</p>	<p>These observations about the emerging Local plan are noted.</p>	<p>None</p>
			<p>3.3 Relationship between the Sileby Neighbourhood</p>	<p>Noted</p>	<p>None</p>

			<p>Plan and the Emerging Local Plan - Future Housing Requirements</p> <p>3.3.1 The SNP describes how its proposals have been prepared to align with the emerging Charnwood Local Plan, and cover the period 2018 - 2036. Section 8 of the SNP in particular identifies how its policies have been drafted in the context of the borough Council's April 2018 'Towards a Local Plan for Charnwood' discussion paper and discussions with Council officers, in order to identify an appropriate housing growth target for the parish.</p> <p>3.3.2 Based on the findings of the 2017 Leicester and Leicestershire Housing and Economic Development Needs Assessment (HEDNA), the SNP identifies how it could be required to be plan for the delivery of 382 or 741 additional dwellings over the period 2018 - 2036, depending on whether the borough Council elects to adopt a Charnwood-wide housing target of 8,100 or 15,700 homes. These figures have been derived from Sileby's share of the borough's overall population, which based on the 2011 Census was 4.72%.</p> <p>3.3.3 Whilst Gladman commend the Neighbourhood Plan Advisory Committee's (NPAC) efforts to identify an appropriate housing target for Sileby, we are concerned that the figure resulting from this process is unjustified and likely to underestimate the true level of future housing need in the parish. In the first instance, Gladman note that the that the SNP appears to be following the formula set out in the Government Planning for the Right Homes for the Right Places consultation however in its response to this consultation the Government stated that it is not proposing to take forward this approach and as such there is no reference to this formula in the revised Framework. This could not</p>	<p>The interim housing target has been developed in conjunction with the local planning authority and the target figure agreed with them as confirmed in their response to this consultation (Response 9, p39, above).</p> <p>The provision of a number</p>	<p>None</p>
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			<p>therefore be demonstrated to be a robust approach to establishing the local housing needs of the neighbourhood area.</p> <p>3.3.4 Furthermore, the SNP's proposed housing target of 566 dwellings has ultimately been derived from the 'middle range' of the 8,100 and 15,700 requirement figures expressed in the borough Council's 'Towards a Local Plan for Charnwood', which would require the delivery of 12,000 additional dwellings across the authority as a whole.</p> <p>3.3.5 Although Gladman recognises that there is currently some uncertainty as to what the future housing target for the borough will be, there is currently no justification for planning for this level of housing growth. No evidence has been provided to demonstrate how planning for the higher of the two figures (15,700 dwellings) expressed in the borough Council's 'Towards a Local Plan for Charnwood' consultation would "put undue pressure on the environment, infrastructure and services" (SNP page 28). The housing figures quoted in the SNP should also be viewed as a 'minimum' level of provision, rather than a cap or target that should not be exceeded once met.</p> <p>3.3.6 Given the current stage of the emerging Local Plan for the borough, it is now likely that its future housing target will now need to take account of the 'standard method' when assessing Charnwood's future housing needs.</p> <p>3.3.7 In this respect, Gladman note that there could be a borough-wide requirement to plan for between 18,400</p>	<p>of reserve sites help to safeguard the status of the NP should the finally agreed number exceed the figure included in the draft NP.</p> <p>The reference to the higher figure putting 'pressure on the environment, infrastructure and services' is a direct quote from the borough council's 'towards a local plan for Charnwood'. (See page 16 of that document). The comment should be addressed to CBC.</p> <p>The consultation paper 'Towards a Local plan for Charnwood' actually says 'greater pressure not undue pressure – we will change the NP to use the same language ....</p> <p>Noted. The NP has a 'buffer' in the form of reserve sites that will come into play should housing need increase over the Plan period.</p>	<p>None</p> <p>Change to be made as indicated.</p> <p>None</p>
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			<p>and 20,900 homes over the period 2016 - 2036 in order to meet the authority's Local Housing Needs in accordance with paragraph 58 of the Framework. When existing commitments for the period 1<sup>st</sup> April 2016 - 31<sup>st</sup> March 2018 are taken into account, this would result in a requirement to plan for a residual housing need of 16,350 - 18,850 dwellings.</p> <p>3.3.8 Should the SNP proceed and fail to plan for sufficient housing in accordance with the emerging Local Plan for Charnwood, there is a real risk that its proposals will need to be reviewed upon the emerging Local Plan's adoption, to remain an up-to-date part of the Development Plan and decision-making framework for the parish.</p>	<p>The housing target will be monitored and the NP formally reviewed should the housing requirement exceed the levels of new housing provided for within this NP.</p>	<p>None</p>
			<p>4 SILEBY NEIGHBOURHOOD PLAN POLICIES</p> <p>4.1 Context</p> <p>4.1 .1 These representations are made in response to the current consultation on the pre-submission version of the SNP, under Regulation 14 of the Neighbourhood Planning (General) Regulations 2012. This chapter of the representation highlights the key points that Gladman raise with regard to the content of the SNP as currently proposed.</p>	<p>Noted</p>	<p>None</p>
			<p>4.2 Neighbourhood Plan Policies</p> <p>4.2.1 This section of the representations provides Gladman's comments on the draft SNP's policies. As currently proposed, Gladman believe that a number of the SNP's policies require further modification/amendment, before they can be considered consistent with the Neighbourhood Plan Basic Conditions.</p>	<p>Noted</p>	<p>None</p>

			G1	<p><u>Policy G1 - Limits to Development</u></p> <p>4.2.2 SNP Policy G1 seeks to introduce a revised settlement boundary for the Sileby settlement area. Explaining how this has been defined to take account of development sites with an extant planning permission as at 1<sup>st</sup> July 2018, the policy describes how development outside of the limits to development will be carefully controlled in line with local and national strategic planning policies.</p> <p>4.2.3 Gladman would object to the use of settlement limits if these would preclude otherwise sustainable development from coming forward. The Framework is clear that development which is sustainable should go ahead. The use of settlement limits to arbitrarily restrict suitable development from coming forward on the edge of settlements would not accord with the positive approach to growth required by the Framework.</p> <p>4.2.4 As discussed in Section 3 above, there is currently some uncertainty over the level of future development that will need to be delivered in Sileby to meet the settlement's and wider borough's housing needs. Until such time that the Borough Council has confirmed the</p>	<p>Noted</p> <p>Noted. CBC has its own settlement boundary which would apply if there was not one in the NP, so it is difficult to see what the purpose of the objection is.</p> <p>The use of settlement boundaries is a commonly used tool <b>not</b> to prevent development (we have already established that NPs cannot promote less development than required through the Local Plan) but to ensure that development takes place in the most sustainable locations.</p> <p>Noted. It is for this reason that reserve sites are incorporated into the NP.</p>	<p>None</p> <p>None</p> <p>None</p>
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			<p>future level of development that will need to be delivered in Sileby, there can be no assurances that the SNP's policies and development limits can plan for this level of growth.</p> <p>4.2.5 In this context, Gladman submit that it would be premature to impose a revised development limit around Sileby through the SNP process at the present time. The lack of any clarity over the future housing needs of the settlement and wider borough further emphasises the need to have a flexible policy on future development within and adjoining the edge of the settlement.</p> <p>4.2.6 In light of the above, Gladman consider that the SNP would be better served by a criteria-based approach to assessing proposals adjoining Sileby's settlement, in accordance with the requirements of national policy. The following wording is put forward for the NPAC's consideration:  <i>"The neighbourhood plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework.</i></p> <p><i>Development proposals that are considered sustainable and well related to the existing settlement will be supported provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development."</i></p> <p><u>Policy G2 – Design</u></p> <p>4.2.7 Policy G2 provides a set of criteria that all new commercial and residential developments, including one</p>	<p>Noted. We disagree with this opinion and the removal of the settlement boundary would just mean that the CBC settlement boundary would apply, rendering this comment irrelevant.</p>	<p>None</p>
		G2		<p>Noted</p>	<p>None</p>

			<p>of more houses, should meet. The criteria include:</p> <p>a) New development should enhance and reinforce the local distinctiveness and character of the area in which it is situated, particularly within the Conservation Area, and proposals should clearly show within a Design and Access Statement how the general character, scale, mass, density and layout of the site is sympathetic to any neighbouring properties and the surrounding area. The development should not have any adverse effect on the visual amenities of the street scene nor wider rural landscape views;</p> <p>c) New residential development shall include a minimum of two off-street car parking spaces for 1 or 2 bedroomed dwellings; three for three-bedrooms and four for 4+ bedroomed properties. Extensions should not result in the loss of parking spaces below</p> <p>g) Development should incorporate sustainable design and construction techniques to meet high standards for energy and water efficiency. Dwellings should be built with rainwater recycling to both front and rear of property. Property frontages must also have either lawns or gardens to avoid water run-off from hard standing.</p> <p>4.2.8 In respect of criterion a), Gladman submit that further clarity should be provided on the statement '<u>any adverse effect</u> on the visual amenities of the street scene nor wider rural landscape views' (our emphasis) and how this will be assessed. At the current time it is unclear how a decision maker or applicant should apply this criterion, or what the SNP deems to be an 'adverse effect' on these two features. As such, this element of the policy as currently drafted is not consistent with basic condition (a).</p>	<p>This was not highlighted as an issue within comments provided by CBC, who are the body that will be responsible for applying the policy.</p> <p>We disagree that this criterion, which seeks to promote high standards of design in accordance with both the Local Plan and the NPPF, fails to meet the bac=sic</p>	None
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				<p>4.2.9 Criterion b) of the policy seeks to define parking standards for new residential properties. We suggest that these are discussed with the Council's policy team, to ensure they align with Leicester County Council's parking requirements. Of relevance to this matter, we note that Policy TI of the SNP also states that 'new developments within the limits to development are to incorporate additional car parking spaces in accordance with the LCC Highways standards for residential and commercial development'.</p> <p>4.2.10 With regard to criterion g), we suggest that there should be no specific requirement for new dwellings to have front lawns and gardens on drainage grounds, as an appropriate surface water management scheme should be capable of addressing this issue, without the need for prescriptive guidance on property frontages.</p> <p><u>Policy HI — Reserve Sites</u></p> <p>4.2.1 1 Policy HI of the SNP outlines how further allocations will be considered for residential development on six sites with Sileby's proposed limits to development, subject to the following criteria:</p> <ul style="list-style-type: none"> <li>a) It is required to remediate a substantial shortfall in the supply of housing land due to the failure of existing housing sites in Sileby to deliver the anticipated scale of development required; or</li> <li>b) It becomes necessary to provide for additional homes in the parish in accordance with any new development plan document that replaces the Charnwood Local Plan.</li> </ul> <p>4.2.12 As currently drafted Gladman submit that this</p>	<p>condition.</p> <p>This is criterion c We will retain the policy as parking is a particularly bad problem in Sileby.</p> <p>We will remove the reference to front lawns and gardens.</p> <p>Noted</p> <p>We consider it to be clear</p>	<p>None</p> <p>Change to be made as indicated.</p> <p>None</p> <p>Change to be</p>
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			<p>policy is not effective and lacks clarity. It is not readily apparent how a 'substantial shortfall in the supply of housing' land will be quantified or measured, or how this relates to 'the anticipated scale of development required'. In this respect, at ID: 41-041 the PPG makes clear that 'a policy in a neighbourhood plan should be clear and unambiguous. It should be drafted with sufficient clarity that a decision maker can apply it consistently.</p> <p>4.2.13 As currently proposed, Gladman believe that policy HI would fail to accord with these requirements</p> <p><u>Policy H2 — Windfall Development</u></p> <p>4.2.14 Policy H2 outlines how small residential development proposals of up to 5 units on infill and redevelopment sites will be supported, subject to proposals being well designed in accordance with the policy's criteria, and meeting the relevant requirements of other SNP policies, and those of the borough-wide development plan.</p> <p>4.2.15 Whist having no objections to the principle of windfall development or the re-development of previously developed land, Gladman question whether the Neighbourhood Plan's '5 dwelling' cap for windfall proposals is justified. We are not aware of any evidence to support the use of this figure, which could arbitrarily restrict the ability to develop otherwise sustainable housing sites.</p> <p>4.2.16 In this respect, we suggest that a criteria-based policy would be a more appropriate way of managing the redevelopment of land within Sibley's development limits, without an arbitrary limit on the size of acceptable</p>	<p>that the policy will apply in the event that further dwellings are required through an increase in housing need or a failure to deliver existing approvals. We will remove the word 'substantial' to make this clearer</p> <p>Noted</p> <p>This figure will be amended to 9 or less.</p>	<p>made as indicated.</p> <p>None</p> <p>Change to be made as indicated.</p>
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			<p>preferences. As local housing needs can change over time, there is also a risk that this policy will be become outdated as new evidence of local need comes to light.</p> <p>4.2.19 To address these points, we therefore suggest that the wording of policy should state that "development proposals should seek to create sustainable, inclusive and mixed communities by providing a mix of house types and size that reflect up to date evidence of local need", rather than setting prescriptive mix requirements.</p> <p>4.2.20 In respect of the decision to define specific building standards, Gladman refer the NPAC to the Written Ministerial Statement (WMS) dated 25th March 2015, which stated that <i>"the optional new technical standards should only be required through any new Local Plan policies if they address a clearly evidenced need, and where their impact on viability has been considered, in accordance with the NPPG"</i>. PPG ID: 56-002 further identifies how local planning authorities <i>"will need to gather evidence to determine whether there is a need for additional standards in their area, and justify setting appropriate policies in their Local Plans"</i>, whilst PPG ID: 56-003 is clear that local planning authorities should consider the impact of introducing specific standards as part of their Local Plan viability assessment.</p> <p>4.2.21 Whilst having no objection to the principle of defining minimum space standards, we suggest that further evidence should be provided to justify their introduction through the SNP. We further query whether these standards can be imposed through a Neighbourhood Plan, as opposed to the policies of Charnwood Borough Council's Local Plan.</p> <p><u>Policy H4 - Affordable Housing</u></p>	<p>Agreed.</p> <p>The policy says that proposals 'should' rather than 'must' therefore allowing some flexibility.</p>	<p>Change to be made as indicated.</p> <p>None</p>
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			<p>4.2.22 Gladman note that the requirements of this policy largely duplicate the contents of Charnwood Local Plan Core Strategy Policy CS3. In this respect it is not necessary for a Neighbourhood Plan to repeat policies already set out in other Development Plan documents, and we therefore suggest that these elements of the policy should be revisited.</p> <p>4.2.23 As identified through our comments on Policy H3 above, we suggest that the tenure preferences expressed in this policy are discussed with the Council's housing team or affordable housing officer, to ensure they align with the borough's Council's affordable housing policies. Any specific tenure requirements should be supported by an adequate and robust evidence base'.</p> <p><u>Policy ENV2 — Protection of Sites of Environmental Significance</u></p> <p>4.2.24 Policy ENV2 states that development proposals which would destroy or harm the species, habitats or features occurring on the parish's sites of environmental significance should not be approved other than in exceptional circumstances.</p> <p>4.2.25 Although Gladman recognise the importance of protecting and enhancing sites and features of ecological value, we suggest that this policy should be amended to reflect the requirements of paragraph 175 of the Framework. In particular, the policy should recognise that it is often possible to address 'harm' to ecological sites and habitats through the use of appropriate mitigation measures.</p> <p>4.2.26 As currently drafted, we suggest that the policy</p>	<p>Noted. We have taken into account the comments by CBC in amending the policy.</p> <p>Noted</p> <p>The policy is to be</p>	<p>Changes as noted above to be made to the NP.</p> <p>None</p> <p>Changes as noted</p>
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			<p>fails to recognise this important principle, and sets an unjustifiably high threshold when determining whether a proposal would be acceptable.</p> <p><u>Policy ENV6 — Biodiversity, Hedges and Habitat Connectivity</u></p> <p>4.2.27 As identified in our comments on Policy ENV2 above, this policy should also recognise that it is often possible to address potential impacts on wildlife corridors through appropriate mitigation measures. We further submit that the policy should offer support for proposals that would enhance the biodiversity value of the parish's wildlife habitats and corridors, including Sibley Brook.</p> <p><u>Policy ENVIO - Managing Flood Risk</u></p>	<p>amended to balance 'harm' against 'benefit' as described in response to comment 9) above</p>	<p>above to be made to the NP.</p>
		ENV6	<p>4.2.28 As currently drafted, the requirements of Policy ENVIO largely duplicate the requirements of national and local planning policies on managing flood risk. In this respect, we suggest that the policy introduces unnecessary repetition, and should be deleted.</p> <p><u>Policy CF6 - Parks and Play Areas</u></p>	<p>The policy is to be amended to balance 'harm' against 'benefit' as described in response to comment 9) above</p> <p>Noted. We believe that the policy reinforces CBC policy.</p>	<p>Changes as noted above to be made to the NP.</p> <p>None</p>
		ENV10	<p>4.2.29 Policy CF6 identifies that where recreational provision is required as part of a new development, the enhancement of existing play provision, including equipment for a wide range of users, is supported in preference to the creation of new small play areas.</p> <p>4.2.30 Whilst Gladman acknowledge the intentions of this policy, we suggest that its requirements should be</p>	<p>Noted</p> <p>Noted. Comments from CBC have been</p>	<p>None</p> <p>None</p>

			<p>discussed with the Council's Open Spaces team. Although the enhancement of existing play facilities and recreation areas can often be preferable to new on-site provision, this must also take account of local accessibility and quantity standards.</p> <p><b>LAND AT BARNARDS DRIVE, SILEBY</b></p> <p>5.1 Development Proposals</p> <p>5.1 .1 As the Neighbourhood Plan Advisory Committee will be aware, Gladman have an interest in Land at Barnards Drive, Sileby. The site was recently the subject of a planning application for up to 228 dwellings (including 30% affordable housing), which was determined by Charnwood Borough Council on 20<sup>th</sup> December 2018 (Application reference P/ 18/0659/2).</p> <p>5.1 .2 As part of preparing the current draft of the SNP, Land at Barnards Drive was considered as a through the NPAC's 'Site Selection Framework'. This document ranks the development potential of 21 sites in the parish, based on 28 scoring criteria. Through this exercise, Land at Barnards Drive was awarded the rank 'Red -5'.</p> <p>5.1 .3 Having reviewed the NPAC's assessment of Land at Barnards Drive, Gladman respectfully disagree with a number of the NPAC's conclusions. In several instances, we do not believe the NPACs assessment provides an accurate assessment of the site's characteristics, and the constraints that would affect its development. A number of issues raised in the NPAC's assessment have now been clarified during the determination of Gladman's recent planning application for the land. In this respect, we make the following comments:</p>	<p>incorporated. The size of potential developments in the Plan area are unlikely to generate a requirement for small play areas.</p> <p>Noted.</p> <p>It is understandable that developers whose land has not been put forward for development will raise concerns and challenges about the outcome of the scoring system.</p> <p>However, the process that was followed was open, thorough and comprehensive.</p> <p>There is inevitably an element of subjectivity involved but the process followed has passed examination at every other NP in which it has been applied and it is considered to be appropriate and proportionate for a neighbourhood plan.</p>	<p>None.</p>
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				<p>- Site Area and Capacity - NPAC Rating 'Red' - Scale in itself is not a reason for resisting otherwise acceptable development schemes, without consideration of the wider harms and impacts of a proposal. In the case of Land at Barnards Drive, no unacceptable technical, infrastructure or environmental impacts would arise from the site's development, as demonstrated through Charnwood Borough Council's recent decision on Gladman's application proposals.</p> <p>- Current Use - NPAC Rating 'Red' - There is nothing to preclude the use of land that is currently in agricultural use for housing development. It is almost inevitable that some agricultural land will need to be developed to meet the area's housing needs.</p> <p>- Adjoining Uses - NPAC Rating 'Amber' - The site adjoins the countryside on two boundaries, not three as suggested in the NPAC's assessment. The site does not sit within 'very open countryside', and is well related to existing residential development situated off Heathcote Drive, and the soon to be completed Seagrave Park development.</p> <p>- Topography - NPAC Rating 'Amber' - The site sits on similar contours to adjacent residential development and the Seagrave Park development, on the opposite valley side. Although some minor land re-profiling may be required during the course of the site's development, we do not believe this justifies an 'amber' rating under this criterion.</p> <p>- Greenfield or Previously Developed Land - NPAC Rating 'Red' - Whilst national planning policy states that 'strategic policies should set out a clear strategy for accommodating objectively assessed needs, in a way that makes as much use as possible of previously</p>		
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			<p>developed land' (Framework paragraph 1 1 7), this does not preclude the development of greenfield sites.</p> <p>- Good Quality Agricultural Land - NPAC Rating 'Red' - Whilst Gladman notes that the site is identified as Grade 2 and 3 agricultural land on the Magic <sup>8</sup> website, this is a very broad assessment. Furthermore, Gladman note that a large proportion of the land surrounding Sileby, and in the wider borough, falls into these categories. The use of Best and Most Versatile (BMV) agricultural land has not been a reason for refusing other recent development schemes around the settlement.</p> <p>-Landscape and Visual Impact Assessment - NPAC Rating 'Red' - As identified in the Officer Report for our recent planning application, there were no objections to our proposals on landscape and visual grounds. The site would provide a well-contained and logical extension to the existing settlement edge, and have a very limited visual envelope.</p> <p>-Important Trees, Woodlands &amp; Hedgerows - NPAC Rating 'Red' - As identified in the Officer Report for our recent planning application, there were no objections to our proposals in relation to these matters. The majority of existing trees and hedgerows would be retained as part of the site's development, whilst a large area of open space would be provided along the course of Sileby Brook. New green infrastructure, including new tree and hedgerow planting, would be provided as part of the site's development</p> <p>-Relationship with Existing Pattern of Built Development - NPAC Rating 'Amber' - We do not believe that new</p>		
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				<p>housing would appear incongruous in this location, given the nature of the surround land uses. It is our view that the site is well related to the existing pattern and built form of the settlement.</p> <p>-Impact on the Conservation Area or its Setting - NPAC Rating 'Amber' - As the NPAC's site assessment states, there is no inter-visibility between the site and Sibley's conservation area. It is not considered that the development of the site would harm the conversation area's significance.</p> <p>-Safe Pedestrian Access to and from the Site - NPAC Rating 'Red' - As identified in the Officer Report for our recent planning application, there were no objections to our proposals in relation to this matter. New pedestrian linkages to the existing network of footpaths within the settlement would be provided as part of the proposals. There are no third-party landownership issues that would prevent vehicular, pedestrian or cycle access to the site.</p> <p>-Safe Vehicular Access to and from the Site - NPAC Rating 'Amber' - Leicestershire County Council, as the relevant Highway Authority for the local area, have confirmed that the site can be satisfactorily accessed via an extension of Barnards Drive.</p> <p>-Impact on Existing Vehicular Traffic - NPAC Rating 'Red' - Leicestershire County Council, as the relevant Highway Authority for the local area, did not object to our proposals on this issue.</p> <p>-Safe Access to Public Transport - NPAC Rating 'Red' - As described in the Officer's Report for our recent planning application, it is considered that there would be suitable transport choices within convenient distances for any future residents of the site.</p>		
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				<p>Distance to Designated Village Centre, the Village Hall - NPAC Rating 'Red' - As described in the Officer's Report for our recent planning application, it is considered that the site is sustainably located when considering its proximity to the village centre, notably closer than the site at Seagrave Road allowed at Appeal in July 2018.</p> <p>Distance to nearest Primary School - NPAC Rating 'Red' - As above, it is considered that the site is sustainably located in relation to Sileby's services and facilities, including Highgate Community Primary School.</p> <p>-Distance to GP/Health Centre - NPAC Rating 'Amber' - As above, it is considered that the site is sustainably located in relation to Sileby's services and facilities, including local health facilities.</p> <p>-Gas, Oil, Pipelines and Networks &amp; Electricity Transmission Network - NPAC Rating 'Amber' - The need to underground or re-route the existing low voltage overhead line that crosses the southern corner of the site would not pose a constraint to development.</p> <p>-Any known Flooding Issues - NPAC Rating 'Amber' - There were no objections to our recent planning application on flooding grounds</p> <p>Any Drainage Issues - NPAC Rating 'Amber' - As identified in the Officer Report for our recent planning application, the Lead Local Flood Authority (LLFA) did not object to our proposals on drainage grounds.</p> <p>5.1 .4 In light of the above, Gladman maintain that Land at Barnards Drive is a highly sustainable and suitable location for further residential development. We would be happy to discuss the above submissions and the findings of the NPAC's site appraisal in more detail,</p>		
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			<p>should this be of interest to the Neighbourhood Plan Advisory Committee.</p> <p>6 <b>CONCLUSIONS</b></p> <p>6.1 .1 Gladman recognises the Government's ongoing commitment to neighbourhood planning and the role that such Plans have as a tool for local people to shape the development of their local community. However, it is clear from national guidance that the SNP must be consistent with national planning policy and the need to take account of up-to-date housing needs evidence and the direction of growth outlined in the emerging Local Plan Review. If the plan is found not to meet the Basic Conditions at Examination, then the plan will be unable to progress to referendum.</p> <p>6.1 .2 The Neighbourhood Plan Advisory Committee must ensure that the policies within the SNP allow for sufficient flexibility and are based on robust and justified evidence.</p> <p>6.1 .3 As detailed through these submissions, we suggest that greater flexibility must now be built into the SNP's proposals given to current uncertainty over the future housing needs of the parish and wider borough area, and how these should be accommodated through the SNP process. Should the SNP proceed and fail to plan for sufficient housing in accordance with the emerging Local Plan for Charnwood, there is a real risk that its proposals will need to be reviewed upon the emerging Local Plan's adoption, to remain an up-to-date part of the Development Plan for the parish.</p> <p>6.1.4 In a number of instances, the SNP's policies</p>	<p>Noted. We are confident that the NP meets the regulatory requirements.</p> <p>As above</p> <p>Flexibility is built into the NP through the incorporation of reserve sites.</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>
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			<p>duplicate the requirements of national or local planning policies, or require further justification and clarity. These issues should be addressed before the SNP proceeds to the next stage of preparation.</p> <p>6.1.Gladman would be happy to discuss the contents of these representations with members of the NPAC in more detail. Should this be of interest, please do not hesitate to contact us.</p>	Noted	None
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