

-----Original Message-----

From: Cllr. David Snartt < >
Sent: Thursday, September 26, 2024 1:27 PM
To: Lewis Marshall < >
Cc: Richard Bennett < >
Subject: Planning Application P/24/0258/2

Dear Lewis,

My response to your request for my 'call in' reasons, I did previously outlined my initial reasons in an e-mail dated Monday 24th June 2024 (copy to you).

I draw your attention to the information contained within the Woodhouse Parish Neighbourhood Plan Pre-Submission Consultation Responses.

The submissions starting at item 91. It is particularly interesting the detail contained within item 96. In my view, the response is also worth noting in item 96. 'Any planning applications will be judged against the countryside policies within the Core Strategy/Local Plan and the Neighbourhood Plan' This is precisely the view I have demonstrated with this current application, Policy C1 seeks to protect the undeveloped character, intrinsic character and beauty of the countryside. The increase of domestic use within the countryside is not supported by this policy. This follows the principles of Policies CS2 and CS11 of the Core Strategy (2015). This is supported by the Inspector concluding the use of track is now more intensive for domestic access use than just for the management of the woods and maintenance of the paddock. Therefore, in my opinion, with the intensive domestic usage through this access would result in significant harm to the character and appearance of the area. I understand since the appeal was dismissed a Certificate of Lawful Use, which allows the entrance to the wood for management purposes only. Indeed, the paragraph in the First Schedule is clear, for the avoidance of doubt, this certificate does not include a residential use of the access. With the Inspector concluding the use of the track is now more intensively used for domestic purposes, I conclude this proposal is in conflict with the policies outlined above and the detail within the Woodhouse Neighbourhood Plan. This approach is also supported because there are no restrictions on the domestic use from this access, adding to the concerns raised by the Inspector, and information supplied in Appendix 7 I would be grateful if this information is placed on the website including all the details contained within Appendix 7 (Item 96) document of the Woodhouse Neighbourhood Plan.

I have copied in the Head of Service so he is aware of my concerns with this application.

Kind regards,

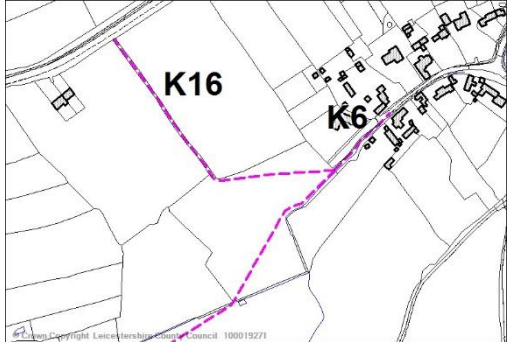
David.

Woodhouse Parish Neighbourhood Plan
Pre submission consultation responses
9th November – 21st December 2020

	Chapter/ Section	Policy Number	Respondent	Comment	Response	Amendment
1	Pg 10	Vision for 2036	Resident	This is disappointing. No sense of any 'vision' at all, merely conserving what we have with no sense of improvements.	We disagree. The NP seeks to shape future development in the Parish as the vision makes clear.	None
2	Pg 51	Support for New Business and Employment	Resident	This is very weak. The current employment activities are retail, education, and hospitality. Farming has an important physical presence but few job opportunities. The garage has been highlighted as an area for housing development. We know that three of the educational establishments are always under threat, Maplewell hall and Beaumanor hall, or are scheduled to close, Welbeck college. An opportunity to be proactive in affecting future investment by Government is all its forms and private enterprise that is often influenced by 'cluster' policies is being missed.	This misunderstands the purpose of the NP which is to shape future development activities. The NP does this in relation to business development by including a range of policies which establish the conditions that need to be met for applications to be successful.	None
3	Pg 56	Broadband	Resident	This contains serious inaccuracies and conveys a misleading story. Overall it ignores the current fact that the village is part of the 25% of Leicestershire that cannot access the speeds that the Government (and LCC) have adopted as targets. The narrative is complacent and factually incorrect in places. A minor point is of lack of recognition of history. The village had demonstrated its desire to be amongst the 'early majority' in broadband use and attracted eu and private sector investment by way of villagers' activism. We are now in the last 25%.	Unfortunately we are not able to address any inaccuracies as they have not been identified. Redrafting the narrative will not impact on the policy, which seeks to require future development to access superfast broadband speeds.	None
4	Pg 56	Para 4	Resident	The village as a whole, using the FTTC	The speeds listed are	None

				referred to can access speeds i the 40-80 Mbps already, all supplied by BT Openreach through various retailers. Were there a second supplier as nearby villages have (Virgin Cable) the speeds achievable would probably be over 100Mbps. Speeds targetted by national and county government are approaching 1000 mbps. History shows that the activities we want to do on the internet expand as capacity increases. It would be better not to mention a figure at all than restthe case on an already superceded figure. I do have correspondence with Leicestershire County Council to support my figures.	minimum targets and the policy clearly states the date at which they are applicable, leaving scope for future increases in capacity.	
5	Pg 56	Para 5	Resident	'5g will be adequate' MATERIALLY INCORRECT. 5g is not meant to be the panacea for all things internet. Whilst those with the very newest of phones will notice higher speeds and the early adopters with the extremely new routers can connect to 5g wirelessly the main outcome of 5g will be that more devices (fridges, street lamps, cctv cameras) can interact and provide new services - the 'Internet of Things'. The capacity will not replace cables in the ground , https://www.bbcmag.com/rural-broadband/5g-is-not-the-answer-for-rural-broadband NB the article cited specifically points out that 5g will not be the solution for those working from home .	We have made changes to better reflect the situation in Woodhouse	Change to be made as indicated.
6		Policy BE6	Resident	Suggests alternative wording 'Every individual dwelling in new housing developments should have a broadband connection installed with a speed capacity at least above average for the village. New developments of more than 3 properties must show by consultation with at least one core supplier, that the	We do not think this phrasing of a neighbourhood plan policy meets the basic conditions.	None

				<p>additional new connections will not negatively impact existing users or that mitigation activities are in place. Developers may be asked to collaborate with supplier(s) and possibly contribute towards mitigation*'. *there are precedents for this elsewhere in the UK</p>		
7	Pg 58	Policy T1	Resident	<p>There is no provision for 'improvement' of any kind. The actors in this problem are not just property developers, the list includes County Council for instance. I suggest an addition. 'Over the course of this plan the Parish Council will take a lead in seeking improvements to the safety and environmental effects of traffic management within the villages. Active consultations with County and Borough planners and Highways departments, in particular, will strive to generate opportunities for better access with lower risks and fewer invisible health hazards'</p>	This is not a planning policy but a community action and is addressed in the community actions listed in section 7 on page 64	None
8		General	Resident	<p>The draft is a fine piece of work and all credit to those involved. Doesn't agree with the suggestion that the majority of the 20 houses be built on the site of Selby's garage. This company provides a vital service to the community with vehicle services and repairs as well as selling fuel. In addition, they are one of the few in the village providing employment to local people. Suggests the committee are being a bit blinkered by the limits drawn for the village boundary and the two small sites offered as alternatives are not really feasible. A much better idea would be to</p>	<p>We can only assess those sites that are put forward for development. Of those that were made available, the comprehensive assessment process ranked the Selby Garage Site as the most appropriate locations of residential development.</p>	None

				expand the boundary limits and develop a small estate in the field at the woodhouse side at the back of the bull's head pub. This would still be within walking distance of village facilities, shops, school etc . And would have only minimal impact on the environment.		
9			Resident	References to The Countryside Agency Landscape Access Recreation Managing Public Access – A guide for Land Mangers from Andrew Poole (PROW Inspector) applying to certain queries previously raised regarding fencing and access over the lower Johnson meadow.	Noted	None
10		Figures 2, 3, 4, 9, 10, 11 and 23	Resident	<p>One point to bring to attention is that the following maps in the plan show the footpath as being incorrect in the field. Suggests referring to the Definitive Map for K6 footpaths.</p> <p>It would be appreciated if you could use the correct map in the neighbourhood plan to avoid any confusion. With the fields now being designated SSSI, the last thing we need are the public walking over the wrong areas.</p>  <p>Maps to be amended: Figure 2, 3, 4, 9, 10, 11 and 23.</p>	<p>The Ordnance Survey maps which have been used as the base maps for the NP cannot be modified. If the Survey is wrong, we suggest that you make representation to the OS itself; but please note that the OS makes clear on all its maps that 'the representation of any path is no evidence of the existence of a Right of Way'. Nor is it an admission that the Right of Way is to be eradicated.</p> <p>However, we will add a statement to this effect in the submission version of the NP and make it clear that this does not infer any right of access onto the land.</p>	Change to be made as indicated.
11		As above	Resident	Please see email from Ian Johnson for	See above.	Change to be made as

				amendments to be made before publication.		indicated.
12	Appendix 6		Resident	Appendix 6 our garden and two parcels of our adjoining land (219 and 220) have still been treated as open to the public. As with our previous discussions we're a little uncomfortable with this and there are obvious repercussions for how highly these areas then score for environmental/public significance.	These are private gardens and the scoring will be reviewed to reflect this.	Inventory to be reviewed and updated as necessary
13	Appendix 6 Pg 26 Appendix 6 Pg 31 Pg 33	Fig 8, Fig 13 Fig 14	Resident	Scoring of some of our land within the environmental inventory in Appendix 6 and the impact this has on its stated environment/public significance, notably in figure 8 on page 26, figure 13 on page 31 and figure 14 on page 33. While we support the protection of the Parish's environmental assets this needs to be done in an objective, fact-based way and as such we would like to place on the record the following comments for review ahead of the formal adoption of the Neighbourhood Plan.	Noted	None
14		287 - Long Close Gardens	Resident	Recognises the garden has been open to the public on a voluntary basis in the past, we would respectfully ask that it is treated as the private garden that it is. If we choose to invite people/groups into the garden in the future this should be entirely at our own discretion and not an assumed right. As such we are very uncomfortable with the assertion that there are legal access rights, when in fact there are not and this would then seem to invalidate the access practicality and educational value/use scores. This also has implications for the recreational value which we believe should, as a private garden, be zero. We would also question a score of 2 for tranquillity when churchyards in the village score just 1 (the likes of churchyards are highlighted as	These are private gardens and the scoring will be reviewed to reflect this.	Change to be made as indicated

				one of the few areas that would merit the top score); most sites should score zero on this measure. While clearly an attractive garden, we would also question whether this deserves the top possible score for beauty, on a par with the likes of Beacon Hill, a public park and SSSI. As a final point we would be genuinely interested if you had the supporting information that placed the garden as a 3 for both wildlife and historical significance.		
15		219 – Long Close Meadow	Resident	Agree entirely with the environmental credentials here given its recent SSSI designation but again would ask for a review of its recreational value as this again implies an assumed right of public access (where in fact it is landlocked by private land). In addition we would like to make the same point as above regarding the tranquillity score which doesn't seem appropriate for a private meadow.	These are private gardens and the scoring will be reviewed to reflect this.	Change to be made as indicated
16		Church Farm	Resident	Church Farm has been sold. Please address further correspondence to Mr Martin Riley at the Church Farm address.	Noted	None
17		General	Newtown Linford PC	Newtown Linford Parish Council would like to congratulate the Neighbourhood Plan Advisory Group on the work they have carried out in putting together a comprehensive plan and have no further comments to submit.	Noted	None
18		General	Environmental Agency	No formal comments on the submission.	Noted	None
19		Pg 62	Resident	Reads really well and makes clear and coherent arguments. Typo at end of cycling section committing rather than commuting	Thank you for pointing this out.	Change to be made as indicated.
20		General	Highways England	The role of Highway England is to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Woodhouse Parish Neighbourhood Plan, Highway England's	Noted	None

				<p>principal interest is in safeguarding the operation of the M1 Motorway and the A46 Trunk Road which route approximately 4km to the west and 5km to the southeast of the Plan area respectively</p> <p>The NHP is required to be in conformity with the adopted Charnwood Core Strategy (2011-2028) and the emerging Draft Charnwood Local Plan (2019-2036) and this is acknowledged within the document.</p> <p>The draft Charnwood Local Plan sets a target for 160 new residential units to be delivered through Neighbourhood Development Plans in nine of the fourteen 'Other Settlements' between 2019 and 2036, however, it does not define a clear housing requirement for each of these settlements. We understand that in consultation with officers from Charnwood Borough Council, it has been agreed that around 20 new dwellings should be delivered in Woodhouse Eaves village before 2036.</p>		
21		H1, H2, BE1, BE2	Highways England	<p>No specific housing target has been set for Woodhouse village.</p> <p>Policy H1 allocates a land for 16 dwellings in Woodhouse Eaves whilst</p> <p>Policy H2 allocates 2 reserve sites for a total of 8 additional dwellings, to support development in case of failure of the allocated housing site. Policy H2 also provides flexibility should it become necessary to provide additional homes in the parish in accordance with any new development plan document that replaces the existing Charnwood Local Plan 2011.</p> <p>No land has been allocated for employment. However, Policy BE1 supports existing businesses and</p>	Noted	None

				<p>employment opportunities. Policy BE2 supports new businesses and development that do not affect the character of the plan area and have minimal environmental impact once in operation. Considering the limited level of growth proposed across the Neighbourhood Plan area, we do not expect that there will be any significant impacts on the operation of the SRN in the area. No further comments and trust the above is useful in the progression of the Woodhouse Parish Neighbourhood Plan.</p>		
22	Pg 61	Fig 23	Resident	<p>is no public access (or public right of way) through the gate at the corner between the tracks to Woodhouse and Woodthorpe by Mucklin Wood / Lodge. There has been a gate there since at least the 1950s.</p> <p>The public do use the track for recreational purposes which diverts from the lane between Beaumanor Drive and Mucklin Wood at the Mucklin Wood end and goes around the outer path before rejoining the track to Woodthorpe.</p> <p>Our suggestion has been to amend the route of the proposed cycle route in the Draft Plan to follow the current minor 'diversion' rather than to go directly around the corner at the conjunction of the two tracks.</p>	<p>The Ordnance Survey maps which have been used as the base maps for the NP cannot be modified. If the Survey is wrong, we suggest that you make representation to the OS itself; but please note that the OS makes clear on all its maps that 'the representation of any [...] path is no evidence of the existence of a Right of Way'. Nor is it an admission that the Right of Way is to be eradicated.</p> <p>However, we will add a statement to this effect in the submission version of the NP and make it clear that this does not infer any right of access onto the land.</p>	Change to be made as indicated.
23	Appendix 9		Resident	<p>In reference to View 5, in particular, the suggested amendment would increase the time available and enhance the view for people using the path as they would have much improved views by routing the</p>	Noted	None

				<p>path in this way.</p> <p>However, most importantly, we have significant concerns about health and safety for all users should the existing established gate not be present. The track would then be fully accessible by vehicles as a potential through route (which it is not with the current situation). At the moment, there are almost daily instances of completely inappropriate vehicles coming up the lane from Woodthorpe who think that this is a through route and then need to turn around. Some of these vehicles would not be able to pass under the very old oak tree at the corner by the gate without damaging it, and would then be far too large for the track to Beaumanor.</p>		
24		General	Resident	<p>We have studied the plan carefully and have participated in an earlier consultation in Woodhouse Eaves. We are broadly supportive of the Draft Plan and feel that it has been well thought through and responds to the challenges of our times.</p>	Noted	None
25	T4		Resident	<p>We would welcome a minor amendment to the routing of the proposed cycleway near Mucklin Wood as described above to protect the health and safety of users of the track. We would be very happy to provide a drawing and additional evidence to explain further if that would be helpful.</p>	As per 22 above	
26		Footpaths	Quorndon Parish Council	<p>Thank you for the opportunity to comment on your Neighbourhood Plan which members found to be very informative. They were particularly keen to support the improvements to the footpath between Quorn and Woodhouse and would be interested to be involved in proposals going forward.</p>	Noted	None

27			Resident	<p>Further to our call earlier, please see original landowner questionnaire that was submitted. The area hatched in black already has consent for 5 houses so this can be ignored. The area in solid blue is the main area where we would like residential development to be considered however there are other areas contained with the boundary edged in pink that would be suitable for residential development.</p> <p>I don't believe we ever received any confirmation through that this was included/received.</p>	No correspondence was received from Pinehouse Ltd nor Garat Developments therefore the land was not included in the residential assessments.	None
28		General	CBC	<p>Comments provided set out where the plan could be amended either to meet the Basic Conditions or improve the effectiveness of policies. Ongoing dialogue is welcomed and the Council will endeavour to assist and support the preparation of the neighbourhood plan. The Council welcomes sight of the Regulation 16 plan prior to formal submission in order to provide any minor comments outside the scope of the examination</p>	Noted	None
29		General	CBC	<p>Suggest the individual policies are listed within the contents to better highlight them to stakeholders.</p>	Agreed	Change to be made as indicated
30		General	CBC	<p>The figures that include mapping should be included at a higher resolution in order to make the sites/ text shown identifiable. For example, other plans produce separate Policy Maps at A3 size and attach as an Appendix</p>	All figures will be separately available in high resolution on submission of the Plan.	None
31		General	CBC	<p>Suggest that the paragraphs are numbered throughout the document for eventual ease of reference in planning reports/ discussions.</p>	Agreed. We will make this amendment.	Change to be made as indicated.
32		Forward	CBC	<p>Parish may wish to re-consider specifically committing to a 5-year review. This is not a requirement and could result</p>	We believe that the timescale is appropriate as the narrative also allows for review when	Change to be made as indicated.

				in the plan being argued as out of date prematurely (also see Monitoring and Review section).	the Local plan is reviewed. Given the Government's intention to require Local plan to be reviewed every three years we believe that the timescale is necessary and appropriate, however we will change the words to make this more explicit	
33	Para 1 - Introduction	Housing and the Built Environment	CBC	Need to update Local Plan progress prior to Regulation 16. Please contact CBC for an update.	Agreed	Change to be made as indicated.
34	Meeting housing need Para 2	Housing and the Built Environment	CBC	Delete 'because of its position in the settlement hierarchy' and replace with 'in the adopted Local Plan Core Strategy'	Agreed	Change to be made as indicated.
35	Appendix 3	H1	CBC	Useful if the specific assessment made for all 12 sites (i.e. scoring for each site against each criteria), and mapping for all 12 sites, was published within this document. This may be requested as part of the eventual examination. The neighbourhood plan will need to demonstrate at examination that the assessment undertaken is proportionate and detailed guidance is available on the Planning Practice Guidance website. In addition, Appendix 3 could include an assessment of CBC SHLAA sites to ensure that it can be demonstrated that all possible sites have been assessed: https://www.charnwood.gov.uk/pages/shelaa . This is a technical area and CBC welcomes ongoing engagement in order to assist the preparation of the neighbourhood plan.	All SHLAA sites were assessed The full set of assessments will be made available on submission	None
36	Appendix 3	H1	CBC	The proposed allocation adjoins the Conservation Area. Consideration of the impact of the allocation on the setting of the Conservation Area should be demonstrated both in the supporting	We will add in a condition to policy to ensure that the setting of the Conservation Area is taken into account.	Change to be made as indicated.

				evidence (Appendix 3) and recognised in the Policy/ or supporting text		
37		H1	CBC	Clarify that affordable housing provision on site will be provided in accordance with the NPPF Annex 2 definition of affordable housing. This avoids conflicting definitions.	This clarification will be made	Change to be made as indicated.
38		H2	CBC	CBC's Strategic Asset Manager has responded separately to this consultation requesting that the two sites identified in Policy H2 are not identified within the plan.	It is not possible to allocate the sites as reserve sites without being identified. The NP already states that the sites are not currently available for development which we trust is sufficient.	None
39		H3/H4	CBC	It is noted that Policy H3/H4 would still apply to sites within the Limits to Development.	Noted	None
40		H3	CBC	Minor discrepancies between Figure 4 of the WNP and the emerging Charnwood Local Plan, which is supported by the Council's evidence base. Any deviations from the Local Plan evidence base should be supported by evidence as this may be requested as part of the examination. For example to the rear of 127 Birdhill Road is different. CBC can provide a map with consistent 'limits to development' boundaries upon request.	It was the intention to follow the limits to development as drawn in the emerging local plan, even though the NP can draw its own boundary. We will redraw the map to be consistent with that in the emerging Local Plan.	Change to be made as indicated.
41		H3	CBC	Suggest re-phrasing policy text from 'carefully controlled' to 'managed', which is more positively expressed	We would prefer to retain the use of the word 'controlled' as it has successfully passed examination elsewhere.	None
42		H4	CBC	Policy H4 provides criteria for development proposals within the Limits to Development boundary. As such it would provide additional clarity for stakeholders to merge policies H3 and H4 together.	We believe that the two policies are clear as separate policies and do not require merging. One defines the limits to development and the other identifies the conditions that need to be met to develop within them.	None
43	Part D	H4	CBC	The wording is confusing. Advise replacing 'restricted' with 'small infill'.	Noted. We will amend to say 'They comprise a small infill	Change to be made as indicated.

				Advise clarifying 'or on other sites within the built up area of Woodhouse Eaves' which is very general.	gap in the continuity of existing frontage buildings or where the site is closely surrounded by existing buildings'	
44	Part E/F	H4	CBC	Move the 'and' from the end of E to the end of F	Agreed	Change to be made as indicated
45	Part G	H4	CBC	At the start of this part, add the text 'where the proposal is for housing'. This will widen the scope of the other parts of the policy. In relation to providing for those with restricted mobility, the WNP may wish to consider the merits/ evidence for giving policy weight to optional lifetime homes Building Regulations standards (see paras 0.3-0.6 of https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/540330/BR_PDF_AD_M1_2015_with_2016_amendments_V3.pdf).	Agreed As this is only optional and Ministerial Statements have said that NPs cannot include policies relating to building regulation standards, we think this is best left general as is.	Change to be made as indicated None
46	4 th Para	H5	CBC	Specifies tenure mix requirements in relation to affordable housing provision. It is suggested that this and the accompanying 4 bullets are removed as they are overly prescriptive. It is considered that the requirement in the Core Strategy (and included in the draft Local Plan) for proposals to be supported by a Housing Needs Study will better take account of what the specific affordable housing requirements for a proposal are.	Noted. Will add 'where viable and supported through up to date evidence of local need'.	Change to be made as indicated.
47		H5 Support	CBC	Ensure the tenure mix requirements are evidenced or caveat these with 'where viable'. This will ensure flexibility in the provision of affordable housing contributions.	See above	Change to be made as indicated.
48		H6	CBC	References to Village Design Statements – advise that these are attached to the WNP document to ensure all policy requirements are in one place. It may be helpful if the supporting text to the policy	The policy currently states that proposals should 'have regard for the VDSs' which we think is sufficient.	None

				includes an explanation of the age of the document and why it is considered that these are still relevant. It should also be stated that the policies contained within Appendix 5 are supplementary to Policy H5 (i.e. they add useful advisory additional detail, but policy H5 is the formal planning policy).	The VDS remains valid as it continues to capture the historic nature of the village)	
49	Part B	H6	CBC	Reference the important views identified in policy ENV8.	Not sure why this is necessary in Policy H6?	None
50	Part E	H6	CBC	Reference to 'fostering' is unclear in practical terms. If it is the case, state that the intention of this part is to encourage the consideration of biodiversity at the design stage. It would strengthen the intent of the policy if the emphasis was on avoiding harm through design rather than enhancing.	We think it is clear that this refers to promoting biodiversity, however we will add in reference to achieving a net gain in biodiversity.	Change to be made as indicated.
51		ENV1	CBC	Local Green Space designation methodology reflects the NPPF criteria. The Council will provide detailed comments on specific sites, if required, when the final list of designations is presented at Regulation 16 stage	Noted	None
52		ENV2	CBC	Sites that are designated as Local Green Spaces in the WNP should not also be designated as Important Open Spaces as this sets out two conflicting sets of criteria for development management purposes. Designating as both undermines whichever the policy intention is	Noted. We will explain in the narrative that the sites will be removed from the Important Open Spaces policy if the LGS designation is successful	Change to be made as indicated.
53		ENV3	CBC	In order to be consistent with NPPF para 175, the final sentence should include 'or as a last resort compensated for'.	Agreed	Change to be made as indicated.
54		ENV3	CBC	The policy could be strengthened if it included a statement that recognises that ecological mitigation is not confined to the sites identified in ENV/4. New ecological assets may arise, expand or have been missed – a general statement future proofs the policy in this regard.	We can add this to the narrative but do not feel that it is sufficiently clear to be placed in the policy itself.	Change to be made as indicated.
55		ENV4	CBC	Would it provide additional clarity for	We believe that greater clarity	None

				stakeholders if ENV3 and ENV4 were merged? The first paragraph of ENV4 effectively duplicates ENV3	is provided by keeping the policies separate.	
56		ENV4	CBC	Note that tree and hedge removal (unless covered by a Tree Preservation Order/ Provisions of the Hedgerow Regulations 1997/ Conservation Area) is permitted development which reduces the effectiveness of this policy. The requirement for a full tree survey of all trees may be better expressed as a survey 'proportionate to the tree's importance'. It may also be beneficial to refer to assessing tree groups/woodlands as to reduce the tendency of wooded features being split up as part of assessments and therefore being taken out of context.	Agreed	Change to be made as indicated.
57	Appendix 8	ENV5 / ENV6 / ENV7	CBC	It would provide additional clarity for stakeholders if Appendix 8 included a comprehensive list of all sites protected by ENV5 and ENV6, and that this was attached as an appendix to the WNP document and referenced within each policy. Clarify whether the small numbers shown on Figure 15 (i.e. 419 above MLE1131) are also protected – if so include reference/ names/ descriptions of these sites within Appendix 8	The small numbers on the maps are the references to the numbered entries in Appendix 6 for the land parcels in which, or adjacent to which, the features of historical significance occur – see the explanatory text on p.34. It was decided that the legend and key to the maps (figs 13 and 15) combined with these entries provide sufficient information to guide Planners without adding to the Plan's length with separate lists attached to Policies ENV 5 and 6. We will highlight the sites of historical environmental interest in Appendix 8 and explain that the supporting evidence for each site is available in the Environmental	Change to be made as indicated.

					Inventory.	
58		ENV5 / ENV6 / ENV7	CBC	All three policies, ensure that the approach taken towards the protection of heritage assets is consistent with section 16 of the NPPF (perhaps easiest done by making direct reference to the NPPF Section 16).	The policies have been written to be consistent with the NPPF	None
59		ENV8	CBC	Whilst not required, photography of each view, plus a description of what is specifically worthy of protection in each view, would provide a much more useful basis development management purposes	This is available in Appendix 9	None
60		ENV9	CBC	Suggest the opening paragraph is amended to read 'adverse impact on flooding (and in turn climate change targets)' or similar. Although linked, the policy is about flooding and climate change adds an unexplained element.	Agreed	Change to be made as indicated.
61	Part A	ENV9	CBC	Refer to the proposal meeting the detailed sequential / exception tests set out in paragraphs 157-160 of the NPPF	Agreed	Change to be made as indicated.
62	Part B	ENV9	CBC	Replace 'hydrological study' with 'site specific flood risk assessment' as set out in paragraph 163 of the NPPF	Agreed	Change to be made as indicated.
63	Part G	ENV9	CBC	It is unclear how this would be assessed as part of a planning application. Policies need to provide a clear framework for stakeholders	It is considered that the policy is clear and represents a form of words that has passed examination elsewhere.	None
64		CF1	CBC	It would be useful if a map/ list of protected community facilities were included within the policy, which would remove any debate around status of assets	Noted – they are described in detail in the Appendix.	None
65	Part A	CF2	CBC	Perhaps referring to Policy H6 would be more appropriate than the Village Design Statement. Regardless, appendix 5 should be attached to the WNP document	Agreed. We will refer to Policy H6	Change to be made as indicated.
66	Part B	CF2	CBC	Amend this part by moving 'that cannot be mitigated' to the end of the sentence, therefore mitigation applies to traffic and disturbance.	Agreed	Change to be made as indicated.

				It would be beneficial if 'other disturbance' was defined – does it relate to amenity (i.e. noise, odours, light, etc?).	We will define this as relating to harmful impacts.	Change to be made as indicated.
67	Part E	CF2	CBC	It would be beneficial if infrastructure was defined in order to provide a clear framework for decision making – is this referring to road networks?	Yes – we will clarify this as relating to the road infrastructure	Change to be made as indicated.
68	Part C, ii	CF3	CBC	Add 'that cannot be mitigated'	Agreed	Change to be made as indicated.
69		BE1	CBC	Should the policy name and text relate to 'employment and retail use'? This would be a useful clarification as planning policies generally distinguish between retail and employment as separate matters.	Agreed	Change to be made as indicated.
70	Part A	BE2	CBC	It would be beneficial if infrastructure was defined in order to provide a clear framework for decision making – is this referring to road networks?	Yes – we will clarify this as relating to the road infrastructure	Change to be made as indicated.
71	Part A & B	BE3	CBC	It could be clarified that these provisions are to protect historic/ traditional shopfronts. For example, 'significance' could be replaced with 'traditional shopfront features'	Agreed	Change to be made as indicated.
72	Part D	BE3	CBC	Attach Appendix 5 as part of the WNP document.	The Appendices will all be available on the website.	None
73	Part A	TO1	CBC	Refer to the figure showing important views	We don't think it is necessary to list other NP policies that apply to each policy as this is given.	None
74	Part B	TO1	CBC	Refer to 'that cannot be mitigated'	Agreed	Change to be made as indicated.
75		BE6	CBC	In relation to the requirements of this policy, it is important that relevant telecommunication providers are consulted and a response received. NPPF paragraph 16b states that plans should be deliverable – therefore need to ensure this provision can be applied. It is likely that this will be raised as part of the examination therefore written clarification	This is a general policy requiring compliance with current good practice and with similar wording has passed examination elsewhere.	None

				would be beneficial		
76		Monitoring & Review	CBC	Suggest commitment to reviewing the plan in 2025 is removed (see comments on Forward).	See response to no. 32	None
77		General	Historic England	The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.	Noted	None
78		General	Historic England	The NP area contains important designated heritage assets. Please consult the local planning authority, county archaeological advisory service and HE's website. https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/ Planning for the Environment at the Neighbourhood Level" 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: http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf	Noted	None
79		New Housing	Historic England	If you envisage including new housing allocations in your plan, we refer you to our published advice available on our website, "Housing Allocations in Local Plans" as this relates equally to neighbourhood planning. This can be found at < https://content.historicengland.org.uk/images-books/publications/historic-	Noted	None

				environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans.pdf/>		
80		General	LCC	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	Noted	None
81		General	LCC	County Highways 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 fully 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.	Noted	None
82		General	LCC	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. 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	Noted	None

				<p>require maintenance funding to be provided as a commuted sum.</p> <p>In 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 ie 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.</p> <p>Where any measures are proposed that would affect speed limits, on-street parking restrictions or other Traffic Regulation Orders (be that to address existing problems or in connection with a development proposal), their implementation would be subject to available resources, the availability of full funding and the satisfactory completion of all necessary Statutory Procedures.</p>		
83		Traffic Flow & Volume Management	LCC	The parish must be fully aware of the costs associated with provision of new footpaths / cycleways as this would need to be fully funded by a third party and not LCC	Noted	None
84		Flood Risk Management	LCC	LCC are fully aware of flooding that has occurred within Leicestershire and its impact on residential properties resulting in concerns relating to new developments.	Noted	None

			<p>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"> •Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation. •Use existing flood risk to adjacent land to prevent development. •Require development to resolve existing flood risk. <p>When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points:</p> <ul style="list-style-type: none"> •Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)). •Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map). •Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding. •How potential SuDS features may be incorporated into the development to enhance the local amenity, water quality 	
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			<p>and biodiversity of the site as well as manage surface water runoff.</p> <ul style="list-style-type: none"> •Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk. <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 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. For info reference is made to the National Planning Policy Framework (March 2012), Sustainable drainage systems: Written statement - HCWS161 (December 2014)</p>	
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				<p>and the Planning Practice Guidance webpage.</p> <p>Flood risk mapping is available</p> <p>Risk of flooding from surface water map: https://flood-warning-information.service.gov.uk/long-term-flood-risk/map</p> <p>Flood map for planning (rivers and sea): https://flood-map-for-planning.service.gov.uk/</p>		
85		General	LCC	<p>If there is no specific policy on A106 contributions/obligations in the NP, it would be prudent to consider inclusion of such a policy in line with the North Kilworth NP and Great Glen NP.</p>	Noted. These policies referred to were removed from the respective NPs. It is not considered necessary to include them here	None
86		General – Minerals & Waste Safeguarding Areas	LCC	<p>Be aware of Minerals and Waste Safeguarding Areas contained within the Minerals and Waste Local Plan. These safeguarding areas are there to ensure that non-waste and non-minerals development takes place in a way that does not negatively affect minerals 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>	Noted	None
87		Property – Education	LCC	<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.</p> <p>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</p>	Noted	None

				development, or the size of a development would yield a new school. However, in the changing educational landscape, the Council retains a statutory duty to ensure that sufficient places are available in good schools within its area, for every child of school age whose parents wish them to have one.		
86		Adult Social Care	LCC	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	This is referenced in the NP	None
87	Pg 21	H6 Design Standards	LCC	The design policy is strong but could be further strengthened by mentioning appropriate provisions for the storage of waste and recycling.	Agreed. We will add this in.	Change to be made as indicated.
88		General	LCC	With regard to the environment and in line with Government 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	Noted	None
89		General	LCC	Climate change, landscape, biodiversity, green infrastructure, brownfield, soils & agricultural land, strategic environmental assessments, recycling, communities, economic development and superfast broadband are all important matters for NH Plans and should be given due consideration.	Noted	None

90		Equalities	LCC	<p>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: www.leicestershire.gov.uk/sites/default/files/field/pdf/2017/1/30/equality-strategy2016-2020.pdf</p>	Noted	None
91			Andrew Granger on behalf of Mr Mattu	<p>On behalf of Mr M Mattu (“the Landowner”), we are seeking to work with Charnwood Borough Council and Woodhouse Parish Council, in promoting the Land adjacent Brand Hill House (“the Site”) for formal allocation within the Limits to Development for Woodhouse Eaves, to enable a small-scale residential development for 1no. self-build dwelling to be progressed.</p> <p>Written submission to the Woodhouse Neighbourhood Plan: Pre- Submission (Regulation 14) Consultation and is framed in the context of the obligation for the Neighbourhood Plan to meet the 'basic conditions' and other legal requirements as established by Paragraph 37 of the National Planning Policy Framework [NPPF] (“the Framework”) (Adopted February 2019). The aforementioned basic conditions and legal requirements are set out in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended), and require the Independent Examiner to consider the following:</p> <ul style="list-style-type: none"> •Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the Neighbourhood Plan 	<p>Noted.</p> <p>We understand the need to meet the Basic Conditions and the NP has been prepared to meet this obligation.</p>	None

				<ul style="list-style-type: none"> •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 Neighbourhood Plan •Having regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the Neighbourhood Plan •The making of the Neighbourhood Plan contributes to the achievement of sustainable development •The making of the Neighbourhood Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area) •The making of the Neighbourhood Plan does not breach, and is otherwise compatible with EU obligations; and •Prescribed conditions are met in relation to the Neighbourhood Plan and prescribed matters have been complied with in connection with the proposal for the Neighbourhood Plan. 		
92			Andrew Granger on behalf of Mr Mattu	<p>The adopted development plan for Charnwood Borough currently comprises of the following:</p> <ul style="list-style-type: none"> •Charnwood Borough Local Plan: Core Strategy (Adopted November 2015); and •Saved Policies of the Borough of Charnwood Local Plan 2004. 	Noted	None
93		Policy CS1: Development Strategy	Andrew Granger on behalf of Mr Mattu	<p>Development Strategy of the adopted Local Plan: Core Strategy sets out the settlement hierarchy for the Borough, and the nature and scale of development that is considered to be acceptable at each level of the hierarchy; Woodhouse Eaves is identified as an "Other Settlement". These settlements are expected to</p>	Noted	None

				<p>cumulatively deliver a minimum of 500 new homes within the settlement boundaries during the plan period, and additional small-scale development opportunities within the defined Limits to Development are also to be supported. The Council's Annual Monitoring Data, and confirmed by recent Appeal Decisions, has identified that the minimum housing requirement for Other Settlements for the plan period has now been achieved. Therefore, further development opportunities within Other Settlements will be restricted to small-scale development within the defined Limits to Development.</p>		
94		Saved Policy ST/2: Limits to Development	Andrew Granger on behalf of Mr Mattu	<p>Limits to Development of the Borough of Charnwood Local Plan 2004 establishes the Limits to Development for the settlements within the Borough. In the case of Woodhouse Eaves, the Site is located outside of the identified Limits to Development and is, therefore, considered to be within Open Countryside.</p> <p>Furthermore, Charnwood Borough Council are currently in the process of preparing a new Local Plan, which will replace the current Local Plan: Core Strategy and Saved Policies of the Borough of Charnwood Local Plan 2004. The Council published their Preferred Options (Regulation 18) Consultation document in October 2019, and the Local Development Scheme identifies that the next consultation stage (Regulation 19 – Pre-Submission Consultation) was scheduled to take place in October 2020. However, this consultation has been delayed as a result of the consequences of the Covid-19 pandemic, and the current uncertainty the exists in relation to the</p>	<p>Noted.</p> <p>The NP has based its housing requirement on the latest evidence of housing need in close conjunction with CBC.</p> <p>Any uncertainty over the method of calculating housing need is not relevant to the preparation of the NP.</p>	None

				standard method for calculating Local Housing Need and the requirement for the Borough to accommodate unmet housing needs arising from other authorities within the Strategic Housing Market Area.		
95		Draft Policy LP1: Development Strategy	Andrew Granger on behalf of Mr Mattu	<p>Development Strategy of the Regulation 18 Consultation Local Plan identifies the proposed spatial strategy for Charnwood; this strategy remains consistent with the existing settlement hierarchy. Woodhouse Eaves continues to be identified as an “Other Settlement”, which are expected to cumulatively provide 945 dwellings (5% of the identified housing requirement) during the plan period to 2036. This housing requirement is to be delivered through sites allocated within the emerging Local Plan, sites allocated in Neighbourhood Plans, and other additional small-scale opportunities within the Limits to Development. The Site continues to be identified as being outside the Limits to Development for Woodhouse Eaves.</p> <p>We have made Charnwood Borough Council (“the Council”) aware of the Site’s availability for development through a formal pre-application advice enquiry. The formal request was submitted to the Council on 8th December 2020 and a response is currently awaited.</p>	<p>Noted.</p> <p>The placement of the site in question outside the limits to development mean that it is unlikely to come forward for development when the NP becomes part of the development plan for Charnwood.</p>	None
96		Site Context & Development Potential	Andrew Granger on behalf of Mr Mattu	<p>The proposed development site comprises a single grassland paddock located adjacent to Brand Hill House, located on Brand Hill, to the south of the village centre of Woodhouse Eaves. The Site, as shown outlined in red in covers an area of approximately 1.98 hectares (4.91 acres) and consists of a single grassland field, containing a derelict former stable building, and is currently vacant. The field slopes gently</p>	<p>Noted. This is not a matter for the NP.</p> <p>Any planning application will be judged against the countryside policies within the Core Strategy/Local plan and the NP.</p>	None

from west to east and benefits from clearly defined boundaries on all sides. The Site is marked by mature boundary vegetation on all sides, whilst an existing wooden gated access is situated along the site's boundary with Brand Hill to the west.



The Site lies to the south of the village centre of Woodhouse Eaves (circa 0.4 miles along Brand Hill), which is a village the benefits from a number of local services and facilities, including a Primary School, St. Paul's Church, Woodhouse Eaves Methodist Church, a Post Office, a Village Hall, a Cricket Club, a number of Public Houses (including The Old Bull's Head, The Curzon Arms and The Wheatsheaf Inn), and a number of local independent business

The village is also well placed to access the additional services and facilities available in nearby higher order settlements, such as: Leicester (approx. 9 miles), Loughborough (approx. 5.3 miles), Quorn (approx. 3.3 miles), Mountsorrel (approx. 3.9 miles) and Barrow upon Soar (approx. 4. 6 miles).

3.5. Whilst the village is situated in a rural location, and the majority of trips are likely to be made by the private vehicle, the Site does benefit from access to sustainable modes of transport. Bus stops are located on Brand Hill immediately adjacent to the existing gated access (which is to be used to serve the development proposals), which are

served by the 154 Bus Service operated by CentreBus. This service runs between Leicester and Loughborough and is scheduled to call at the village hourly between 7am and 7pm on weekdays, and every two hours between 8am and 5pm on Saturdays. However, it is noted that a reduced timetable is currently in operation due to the ongoing Covid-19 pandemic. In addition, the Site is located within the Woodhouse Eaves Conservation Area, first designated in July 1993, and the site is also located within close proximity to a number of Listed Buildings, including Charnwood House (Grade II), The Spinneys (Grade II) and 80-88 Brand Hill (Grade II).

The Site is located within Flood Zone 1 of the Flood Map for Planning and is, therefore, assessed as having low risk of flooding (less than 1 in 1000 annual probability of river flooding). Similarly, it is accepted that the paddock does include areas identified as Medium Risk of Surface Water Flooding, as indicated on Figure 2 below. However, it should be noted that these areas are relatively isolated and would be excluded from the proposed development area. Therefore, the Site is not considered to present a significant risk of flooding.



The Client is seeking to develop a custom-built single property on the land adjacent to Brand Hill House, Brand Hill, Woodhouse Eaves for occupation by their

				<p>family to allow them to remain within the village.</p> <p>We are currently undertaking a range of initial investigations to assess the opportunities and constraints presented by a number of key material considerations, including the potential heritage value, resulting from the Site's location within the Woodhouse Eaves Conservation Area and in proximity to a number of Listed Buildings; and the possible Landscape & Visual Impact resulting from the Site's edge of settlement location and allocation within the Charnwood Forest Regional Park. The results of these initial investigations will feed directly into the preparation of plans for the proposed development. It is our informal view that the nature of the proposed development and the retention of the Site's mature boundary features would ensure the development proposals positively assimilate with the character evident within this part of the Conservation Area and, therefore, appropriately protect the setting and significance of this asset and the identified Listed Buildings. Therefore, we consider the Site presents a suitable development opportunity.</p>		
97		Housing Needs	Andrew Granger on behalf of Mr Mattu	<p>Paragraph 29 of the National Planning Policy Framework [NPPF] ("the Framework") (Adopted February 2019) states that Neighbourhood Plans should not promote less development than that set out within the strategic policies for the area. As previously identified, Woodhouse Eaves is identified as an "Other Settlement" within the Charnwood Local Plan: Core Strategy (Adopted November 2015), which, at this level, sets a hierarchical-specific housing requirement</p>	<p>Noted. The NP will be a 'live' planning document once Made, as long as CBC can continue to demonstrate at least a three year supply (within two years of the NP being Made)</p>	None

				rather than a settlement-specific requirement. Furthermore, as of 9th November 2020, Charnwood Borough Council can only demonstrate a 4.1 year housing land supply and, therefore, the strategic polices are out-of-date. As such, in line with Paragraph 66 of the Framework, the Neighbourhood Plan sets an identified housing target of 20 dwellings, as result of engagement between the Neighbourhood Plan Group and Planning Officers at Charnwood Borough Council.		
98		Housing Needs	Andrew Granger on behalf of Mr Mattu	We are concerned that the identified housing target does not appropriately consider the latest evidence of strategic-level Local Housing Need and, as a result, the emerging Neighbourhood Plan is at risk of being considered out-of-date two years after being made (as per the Written Ministerial Statement) and/or being superseded by the requirements and provisions to be set out within the emerging Charnwood Local Plan 2019-2036, when that document is adopted.	We disagree and prefer to agree these matters with the local planning authority. Windfall development is included in meeting the housing target.	None
99		Housing Needs	Andrew Granger on behalf of Mr Mattu	In accordance with Paragraph 60 of the Framework, we fully support the use of the standard method for determining the minimum number of new homes that should be accommodated within strategic planning policies. In this regard, we sympathise entirely with the challenge that the Borough Council currently faces in establishing an appropriate local housing need for the area given the present high degree of uncertainty that exists regarding the standard method for calculating local housing needs, and the additional uncertainty relating to the redistribution of the unmet housing needs arising from Leicester City Council across the other authorities within the Strategic	Noted	None

				Housing Market Area. Similarly, we fully appreciate the knock-on implications that the uncertainty at a strategic-level has for Neighbourhood Planning Groups to identify an appropriate housing requirement, particularly when, as in the case of the Woodhouse Neighbourhood Plan, the Plan is being progressed in advance on an emerging Local Plan.		
100		Housing Needs	Andrew Granger on behalf of Mr Mattu	In this respect, we accept that Neighbourhood Plans are assessed against the strategic policies of the adopted Development Plan, rather than the policies of an emerging Local Plan. However, the Planning Practice Guidance [PPG] clearly states that the reasoning and evidence informing an emerging Local Plan may be considered relevant (Section 41 Paragraph 009 Ref: 41-009-20190509).	We agree – which is why the housing target is based on the latest evidence of housing need	None
101		Housing Needs	Andrew Granger on behalf of Mr Mattu	With regards to housing needs specifically, the PPG identifies that communities preparing a Neighbourhood Plan should take account of the latest and up-to-date evidence of housing need (Section 41 Paragraph 040 Ref: 41-040-20160211). Furthermore, the PPG identifies that the question of whether or not a proposed Neighbourhood Plan has taken account of the latest housing needs evidence is considered to be relevant in the assessment of whether the Plan's housing land supply contributes to the achievement of sustainable development and, therefore, accords with the basic conditions.	Noted	None
102		Housing Needs	Andrew Granger on behalf of Mr Mattu	In light of the above, the current, up-to-date position on strategic housing needs and, therefore, the implications for the housing requirement identified in the Woodhouse Neighbourhood Plan (Regulation 14) Consultation document	Noted	None

				<p>can be summarised as follows:</p> <ul style="list-style-type: none"> • The adopted Charnwood Local Plan: Core Strategy identifies a housing requirement of 820 dwellings per annum and makes sufficient residential development allocations to achieve an average delivery of 902 dwellings per annum. • However, the Core Strategy was adopted in November 2015 and as such, in accordance with Paragraph 73 of the Framework, the housing requirement for the Borough is presently the local housing need calculated using the standard method. This results in an identified local housing need of 1,105 dwellings per annum • The Council are currently in the process of preparing a new Local Plan which sets out a spatial development strategy and makes allocations to deliver 1,160 dwellings per annum. This would be sufficient to meet the current, identified local housing need set out above. • The housing requirement set out with the Woodhouse Neighbourhood Plan (Regulation 14) Consultation document is based upon the spatial strategy and housing requirements set out within the emerging Local Plan (Regulation 18) Consultation Draft document • However, the Government has been clear in stating that the current standard method is not appropriate for achieving the identified policy objective of delivering 300,000 dwellings per annum nationally. In response to this, consultation has recently concluded on fundamental 		
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				<p>reforms to the planning system as set out within the Planning for the Future White Paper, and also short-term measures set out within the “Changes to the Current Planning System” paper. The proposed short-term modifications include plans to amend the standard method for calculating Local Housing Need. Utilising the proposed revised Standard Method would result in a significant increase in the Borough’s Local Housing need, above the current identified Local Housing Need and the emerging Local Plan requirements, to 1,636 dwellings per annum.</p>		
103		Housing Needs	Andrew Granger on behalf of Mr Mattu	<p>Furthermore, it is acknowledged that recent media publications https://www.bbc.co.uk/news/uk-politics-54950012 have indicated that amendments will be made to revised Standard Method, following strong objections by MPs. However, it is understood that these revisions are likely to seek to increase housing delivery in the Midlands and the North, as part of an ambition to ‘level-up’ the Country, and therefore, it is expected that any further changes to the proposals would only result in further increases to the Local Housing Need for local authorities in these areas, including Charnwood. Notwithstanding the above, there is also likely to be uplift in the Borough’s housing requirement as a result of the need to accommodate some of the unmet housing need arising from Leicester City Council. The Draft Leicester Local Plan (Regulation 18) Local Plan formally confirmed an unmet housing need of 7,742 dwellings. Consequently, in line with Paragraph 11 (Footnote 5) and</p>	<p>Noted.</p> <p>However, The NP cannot be based on what ‘may’ happen – it can only be based on existing evidence.</p> <p>Nonetheless, the NP has identified two reserve sites should further residential development be required, and has expressed a commitment to keep the NP under review should significant changes occur in the planning system.</p>	None

				Paragraph 27 of the Framework, the Strategic Housing Market Area Authorities are now in the process of preparing a Statement of Common Ground setting out how this unmet need will be redistributed across the other authorities within the HMA. Evidence presented at the North West Leicestershire Local Plan: Partial Review Examination Hearing Sessions indicated that the SoCG will be published in Spring 2021. Therefore, this is likely to also contribute to an increase to the housing requirements to be accommodated within the emerging Local Plan in comparison to the Regulation 18 Consultation Document, and by effect, the housing requirement that will need to be accommodated within the Woodhouse Neighbourhood Plan.		
104		Housing Needs	Andrew Granger on behalf of Mr Mattu	In light of the above, Table 1, below, provides an extract from Draft Policy LP1: Development Strategy from the emerging Local Plan (Regulation 18) Consultation document setting out the spatial strategy for residential development, on which the housing requirement contained within the Woodhouse Neighbourhood Plan (Regulation 14) Consultation document is based. An additional column has been provided to consider the potential, hypothetical implications for the housing requirements if the Council were to utilise the current proposed spatial strategy, in order to meet the uplifted local housing need. This identifies that the housing requirement for "Other Settlements" would increase from 945 dwellings to 1,554 dwellings across the plan period.	Noted. We are not seeking to change our approach to development at this stage, having agreed a position with CBC.	None

				<table border="1"> <thead> <tr> <th></th> <th>Number of Homes</th> <th>Share of Housing Provision</th> <th>Number of Homes (Revised Standard Method)</th> </tr> </thead> <tbody> <tr> <td>Leicester Urban Area (Birstall, Syston, Thurmaston)</td> <td>7,056</td> <td>36%</td> <td>11,190</td> </tr> <tr> <td>Loughborough Urban Centre</td> <td>6,331</td> <td>32%</td> <td>9,947</td> </tr> <tr> <td>Shepshed Urban Area</td> <td>2,871</td> <td>15%</td> <td>4,663</td> </tr> <tr> <td>Service Centres (Anstey, Barrow upon Soar, Quorn, Rothley, Sileby)</td> <td>2,490</td> <td>13%</td> <td>4,041</td> </tr> <tr> <td>Other Settlements</td> <td>945</td> <td>5%</td> <td>1,554</td> </tr> <tr> <td>Small Villages and Hamlets</td> <td>23</td> <td>0.1%</td> <td></td> </tr> <tr> <td>Total</td> <td>19,716</td> <td>100%</td> <td>31,084</td> </tr> </tbody> </table> <p>Table 1: Possible Implication of the Revised Standard Method for Local Plan Spatial Strategy & Hierarchical Housing Requirements</p>		Number of Homes	Share of Housing Provision	Number of Homes (Revised Standard Method)	Leicester Urban Area (Birstall, Syston, Thurmaston)	7,056	36%	11,190	Loughborough Urban Centre	6,331	32%	9,947	Shepshed Urban Area	2,871	15%	4,663	Service Centres (Anstey, Barrow upon Soar, Quorn, Rothley, Sileby)	2,490	13%	4,041	Other Settlements	945	5%	1,554	Small Villages and Hamlets	23	0.1%		Total	19,716	100%	31,084		
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Small Villages and Hamlets	23	0.1%																																				
Total	19,716	100%	31,084																																			
105		Housing Needs	Andrew Granger on behalf of Mr Mattu	<p>Based on Table 1 above, the potential implications of the revised Standard Method on the housing land supply for the “Other Settlements” can be summarised as following:</p> <ul style="list-style-type: none"> • The housing land supply for the Other Settlements, as set out in the Regulation 18 Local Plan, comprises of the following split: • Existing Commitments (Current permissions and allocations) = 151 dwellings • Proposed Allocations in the Local Plan = 634 dwellings [80% of new housing supply in Other Settlements • Sites to be identified through the Neighbourhood Plan process = 160 dwellings 20% of new housing supply in Other Settlements] <p>If the Council were to continue with the same proportionate approach in order to meet the identified 1,554 dwellings housing requirement for Other Settlements established by the revised Standard Method, the housing land supply would comprise of the following:</p> <ul style="list-style-type: none"> • Existing Commitments (Current permissions and allocations) = 151 dwellings • Proposed Allocations in the Local Plan @ 80% of New Allocations = 1,122 dwellings 	This comment is best directed at CBC as the NP cannot influence the housing target set by the local planning authority.	None																																

				<ul style="list-style-type: none"> Sites to be identified through the Neighbourhood Plan process @ 20% of new allocations = 281 dwellings. 		
106		Housing Needs	Andrew Granger on behalf of Mr Mattu	As such, the revised standard method would have the effect of potentially increasing the number of dwellings to be delivered on sites to be identified through the Neighbourhood Plan process from 160 dwellings to 281 dwellings.	Noted. As above	None
107		Housing Needs	Andrew Granger on behalf of Mr Mattu	In considering the implications of this for the Woodhouse Neighbourhood Plan, specifically, assuming the Woodhouse Neighbourhood Plan is continued to be expected to contribute 12.5% of the housing development to be identified in Neighbourhood Plans (based on the current 20 dwelling requirement of the identified 160 dwellings in the Regulation 18 Local Plan), the revised Standard Method would increase the housing requirement for the Woodhouse Neighbourhood Plan to 23 dwellings.	This increased housing requirement remains within the threshold provided within the NP when the reserve sites are taken into account – before the allowance for windfall development is even considered.	None
108		Housing Needs	Andrew Granger on behalf of Mr Mattu	In addition, as alluded to previously, the Borough-wide housing need is also likely to be increased to account for unmet housing needs arising from Leicester City Council and this may have further implications for the amount of housing required to be delivered in the Woodhouse Parish	It may But it may not! Comments above apply.	None
109		Housing Needs	Andrew Granger on behalf of Mr Mattu	Consequently, and in view of the additional comments made within this Statement, we are concerned that the proposed Neighbourhood Plan fails to identify sufficient allocations to meet the up-to-date evidence of housing need for the area and, therefore, is at high risk of being considered out-of-date two years after being made (as per the Written Ministerial Statement) and/or being superseded by the requirements and provisions to be set out within the	Should the targets change after the NP has been Made, consideration will be given to reviewing the NP. However, the residential allocation plus two reserve sites plus an allowance for windfall will comfortably meet the possible increased housing requirement identified here.	None

				emerging Charnwood Local Plan 2019-2036, when that document is adopted.		
110		Woodhouse NH Plan Housing Land Supply	Andrew Granger on behalf of Mr Mattu	In respect of the housing land supply identified within the Woodhouse Neighbourhood Plan (Regulation 14) Consultation Draft, we have a number of concerns relating to whether the Plan allocates sufficient development sites to meet the identified housing needs and provide flexibility to accommodate rapid change, whether the allocations meet the specific needs of the plan area and the deliverability of the proposed allocations. The relevant policies of the housing land supply are considered in further detail below.	Noted. The NP is not required to accommodate the potential for 'rapid growth' unless it is formally identified and built into the evidence base. Notwithstanding that, the NP makes sufficient provision to meet the future growth which is the subject of the speculation here.	None
111		H2: Reserve Sites	Andrew Granger on behalf of Mr Mattu	As a result of the likely increase in the housing requirements for the Borough and, as a consequence, the housing requirement to be delivered in Woodhouse Eaves, it is our view that the Reserve Site allocations, identified in Policy H2 of the Neighbourhood Plan Consultation document, are likely to be required to come forward immediately following the plan being brought into force, in order to ensure the plan meets the housing requirements for the area.	This opinion is pure speculation. The NP has met the housing requirement and has a procedure in place should housing need increase. There is no need to allocate more houses through the NP.	None
112		H2: Reserve Sites	Andrew Granger on behalf of Mr Mattu	The immediate requirement for these Reserve Sites to come forward to meeting the housing needs for the area would result in the Neighbourhood Plan having limited further capacity/flexibility to accommodate any additional uplift in the housing requirement for the area, or to overcome any issues within the delivery of the identified housing allocations. In failing to provide sufficient flexibility to adapt to rapid change, the Plan would not be in accordance with Paragraph 11(a) of the Framework. Therefore, it is our view that further Reserve Housing Sites should be	It is incorrect to say that the NP is not in accordance with the NPPF – this is not an accurate statement.	None

				identified in order to provide the Neighbourhood Plan with the appropriate level of flexibility.		
113		H2: Reserve Sites	Andrew Granger on behalf of Mr Mattu	In relation to the above, Paragraph 16 of the Framework states that plan should “be prepared positively, in a way that is aspirational but deliverable”. It is our view that the proposed Reserve Site Allocations at Bird Hill Road and Herrick Road are not considered to be deliverable, in accordance with the definition set out within the Framework, and, therefore, the Plan is contrary to the provisions of Paragraph 16 of the NPPF and, consequently would fail to meet the basic conditions.	There is no requirement in legislation for NPs to have reserve sites, therefore this is not an issue that results in a failure to meet the Basic Conditions. The NP is positively prepared as demonstrated by the residential allocation policies it contains.	None
114	Appendix 2	H2: Reserve Sites	Andrew Granger on behalf of Mr Mattu	The Framework identifies that in order for a site to be considered deliverable it must be “available now, offer a suitable location for development now, and be achievable with a realistic protect that housing will be delivered on the site within five years”.	Agreed – this is why the sites in question are reserve sites to come forward only if future circumstances change. The NP is not dependent upon these sites to meet the Basic Conditions.	None
115	Appendix 3	Sustainable Site Assessment Summary Document	Andrew Granger on behalf of Mr Mattu	In this respect, the Sustainable Site Assessment Summary Document (November 2020) [Appendix 3 of the Draft Neighbourhood Plan] states that “following negotiations with the relevant owners, it is noted that CBC; the owners of the two garage sites, are intending to undertake a strategic asset management review, and do not wish to commit to residential development until the outcome of this review is agreed”. Consequently, it is considered that the availability of the Reserve Sites cannot be confirmed and, as a result, the Site’s cannot be defined as deliverable as per the Framework.	Agreed – but this comment fails to recognise that the reserve sites are just that. They are not allocations that are relied upon. In the event that further housing is needed in the future and the reserve sites remain unavailable, it is likely that windfall development will meet the revised target. If not – the PC will consider reviewing the NP.	None
116		H2: Reserve Sites	Andrew Granger on behalf of Mr Mattu	Notwithstanding the above concerns about the availability of the site’s, we also have concerns about the deliverability of the policy requirements set out in Policy	Noted	None

				H2 for these allocations, in particular, the requirement for the Reserve Sites to provide a proportion of affordable housing.		
117		H2: Reserve Sites	Andrew Granger on behalf of Mr Mattu	Paragraph 63 of the Framework allows rural areas to set a lower threshold of 5 units or fewer for the provision of affordable housing on residential development site and, as such, the policy is consistent with the provisions of the Framework. However, in light of the significant economic implications of the Covid-19 pandemic, we are concerned whether this policy requirement would still be achievable. It is our view that the Government's proposals contained within the "Changes to the Current Planning System" consultation document, in relation to raising the small sites threshold for the provision of affordable housing, is clear evidence of the concerns that exist about the ability for small sites to viability deliver affordable housing during, and in the economic recovery period following, the pandemic.	The evidence IS up to date, and we would suggest that you cannot rely on a government consultation paper to guide development proposals. That is not evidence-based.	None
118		H2: Reserve Sites	Andrew Granger on behalf of Mr Mattu	Therefore, we would suggest that additional up-to-date evidence should be collected to confirm the availability of the proposed Reserve Site allocations and their ability to viably deliver the identified affordable housing requirement. Without the provision of such evidence, the Neighbourhood Plan cannot be considered to be deliverable.		
119		H4: Windfall Development	Andrew Granger on behalf of Mr Mattu	Paragraph 70 of the Framework states that "where an allowance is to be made for windfall sites as part of an 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,	Noted	None

				historic windfall delivery rates and expected future trends”.		
120	Appendix 2	H4: Windfall Development	Andrew Granger on behalf of Mr Mattu	The Woodhouse Neighbourhood Plan identifies that the identified housing requirement for the Plan Area will be met through the allocation of land at Selby Garage for 16 dwellings, and through a reasonable and realistic allowance for windfall development. However, it is our view that no detailed evidence has been included within the Neighbourhood Plan, or the supporting evidence base, about the historic level of provision of housing within the Parish from windfall development and, therefore, the reasonable level of future housing supply that can be expected from this source. It is appreciated that the Housing Needs Report (February 2019) [Appendix 2 of the Neighbourhood Plan] identifies that 34 new build residential sales were recorded between 1995 and 2018; however, it is considered that this does not provide explicit evidence as to the amount of windfall development likely to come forward during the plan period.	As the respondent is aware, the definition of windfall development is ‘development that comes forward unexpectedly’. I’m not sure therefore how you can provide ‘explicit evidence’ as to the amount that will occur during the lifetime of the Plan. The reality is that 34 dwellings over the previous 23 year period would equate to a further 22 dwellings coming forward over the Plan period, up to 2036 – which would exceed the minimum requirement on its own! We will expand on this point in the narrative preceding the policy.	Change to be made as indicated.
121		H4: Windfall Development	Andrew Granger on behalf of Mr Mattu	Without the provision of appropriate evidence to quantify the potential level of housing supply from windfall development, it cannot reasonably be considered to comprise part of the Neighbourhood Plan’s housing land supply. As a consequence, and in combination with the aforementioned concerns about the deliverability of the Reserve Site allocations, the Plan fails to positively prepare for meeting (and exceeding) its housing requirements and, therefore, would fail to meet the basic conditions.	There is no requirement for the NP to allocate sites for residential development in order to meet the Basic Conditions. Other NP policies on housing mix, Affordable Housing, design etc as well as policies on the environment, community facilities and employment also satisfy this requirement.	None
122		H4: Windfall Development	Andrew Granger on	As such, we consider that it would be beneficial for the Neighbourhood Plan to	The respondent’s promotion of the land in his client’s	None

			behalf of Mr Mattu	identify a number of additional/alternative Reserve Housing Sites to come forward in the event that there is a material increase in the housing requirement for the Plan Area, or in the event that the identified preferred sites fail to come forward as desired. Similarly, appropriate evidence needs to be collected to quantify and justify the level of windfall development anticipated to comprise the housing land supply for the Plan Area. In this regard, it is considered that the Client's land would constitute a deliverable, windfall site.	ownership is noted.	
123		H4: Windfall Development	Andrew Granger on behalf of Mr Mattu	Notwithstanding the above, we also have concerns about the proposed draft wording set out within Policy H4: Windfall Sites of the Neighbourhood Plan. Paragraph 16 of the Framework requires Plan to "contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals".	Noted.	None
124	Item G	H4: Windfall Development	Andrew Granger on behalf of Mr Mattu	States that "four-plus bedroom units may be included in the mix of dwellings but will be expected to comprise a clear minority on any single development". The aims of the policy are clear insofar as it seeks to ensure that residential development that comes forward on windfall sites prioritises the provision of smaller properties, as well as dwellings suitable for older people and those with restricted mobilities. However, the current wording is subjective as it is not clear what would differentiate between a minority and a "clear minority" i.e., would a scheme that proposes a housing mix with 49% four-plus bedroom housing be unacceptable, whilst a scheme with 40% four-plus bedroom housing be appropriate?	Noted. We will change the wording to say 'minority'.	Change to be made as indicated.
125		H4: Windfall Development	Andrew Granger on	As such, we would suggest amending the wording so that the policy refers to four-	Agreed. See above	Change to be made as indicated.

			behalf of Mr Mattu	plus bedroom dwellings comprising a minority or, alternatively, the policy needs to provide an objective measure of an appropriate housing mix.		
126		H5: Affordable Housing Provision	Andrew Granger on behalf of Mr Mattu	As previously stated, we fully appreciate the challenge that the Neighbourhood Plan Group is facing in bringing forward the Woodhouse Neighbourhood Plan in advance of the emerging. Charnwood Local Plan; this is no more evident than in the case of affordable housing provision.	Noted	None
127		H5: Affordable Housing Provision	Andrew Granger on behalf of Mr Mattu	Sets a requirement for qualifying sites to provide 30% affordable housing provision, which is considered to be reflective of the emerging Charnwood Local Plan.	Noted	None
128		H5: Affordable Housing Provision	Andrew Granger on behalf of Mr Mattu	However, as previously referenced, it is noted that Neighbourhood Plans are not tested against the policies of emerging Local Plans, as they do not form part of the statutory development plan for an area (Ref: PPG Section 41 Paragraph 009). However, they should have regard to the up-to-date evidence of housing needs. In this regard, it is noted that the emerging Charnwood Local Plan Affordable Housing Viability Assessment (January 2019), produced by HDH Planning, concludes that 30% affordable housing is the reasonable level that can be viably delivered across the Borough.	Noted	None
129		H5: Affordable Housing Provision	Andrew Granger on behalf of Mr Mattu	However, the adopted Local Plan: Core Strategy sets a requirement for qualifying sites in Woodhouse Eaves to deliver 40% affordable housing. As such, the Independent Examiner will be required to balance the issue of the Neighbourhood Plan's conformity with the adopted strategic policies and the Plan's attainment of sustainable development, in the consideration of whether the Plan meets the basic conditions.	Noted. The Examiner will consider the latest evidence of need, and take account of CBCs position in relation to this. CBC have not queried the Affordable Housing requirement stated in the NP.	None
130		H5:	Andrew	Notwithstanding the above, it is our view	However, this judgement fails	None

		Affordable Housing Provision	Granger on behalf of Mr Mattu	that the emerging Neighbourhood Plan fails to identify sufficient residential development sites to meet the identified needs for affordable housing within the Parish. The Affordable Housing Assessment (March 2020) identifies a need for 7 affordable rented, 5 shared ownership and 10 open market homes. The proposed Site Allocations contained within the Neighbourhood Plan (Regulation 14) Consultation document would deliver a cumulative 8 affordable units and, therefore, fails to meet the identified affordable housing need for the area; notwithstanding the aforementioned concerns about the deliverability of affordable housing on the proposed Reserve Sites.	to take account of the existing Affordable Housing and existing market housing in the Parish. Not all need is to be met by new development.	
131		H5: Affordable Housing Provision	Andrew Granger on behalf of Mr Mattu	Furthermore, we also have concerns as to whether the identified tenure split for affordable housing identified within Policy H5 of the Neighbourhood Plan is appropriate, in view of the requirements of the Framework, the development plan and the up-to-date evidence.	CBC have made a similar point and we have agreed to change the policy to say 'where viable and supported through up to date evidence of local need'.	Change to be made as indicated.
132		H5: Affordable Housing Provision	Andrew Granger on behalf of Mr Mattu	The emerging Neighbourhood Plan sets out a requirement for qualifying schemes to provide 1/3 affordable rent, 1/3 shared ownership and 1/3 low cost starter homes. However, Paragraph 64 of the Framework establishes a requirement to provide 10% affordable home ownership products as part of the affordable housing mix on qualifying sites. It is our view that there is no evidence to support the increased proportion of starter homes that is proposed within the emerging Neighbourhood Plan. The Affordable Housing Assessment does not identify any explicit need for starter homes within the Parish; as referenced above the evidence indicates a need for affordable	As above – the precise mix will be determined by up to date evidence of housing need.	Change to be made as indicated.

				rented and shared ownership. Similarly, the emerging Local Plan evidence identifies that the greatest need within the Borough is for affordable rented housing; 77% of the need is for social or affordable rent with the remaining 23% being for intermediate affordable housing.		
133		H5: Affordable Housing Provision	Andrew Granger on behalf of Mr Mattu	Consequently, it is our view that the Woodhouse Neighbourhood Plan (Regulation 14) Consultation document would fail to provide sufficient affordable housing and, in addition, would fail to provide the appropriate tenure mix of affordable housing to meet the identified needs for the Parish.	Noted. See above	None
134		H3: Limits to Development	Andrew Granger on behalf of Mr Mattu	We object to the exclusion of our Client's existing property (Brand Hill House) and Land adj. Brand Hill House from the proposed Limits to Development.	Noted. The Limits to Development have been drawn to mirror those to be introduced by CBC.	None
135	Fig 4	H3: Limits to Development	Andrew Granger on behalf of Mr Mattu	The proposed Limits to Development identified in Figure 4 of the Woodhouse Neighbourhood Plan, which supports Policy H3, are based upon the proposed Limits to Development established within the emerging Charnwood Local Plan (Regulation 18) Consultation Document. These limits are underpinned by the Settlement Limits Assessment (March 2018), which identifies two principles on which the proposed limits to development are based. Firstly, "the boundary will tightly define the settlement by enclosing the established, cohesive built form. Where possible, it will follow defensible boundaries – distinct features such as walls, watercourses, roads and hedgerows which have a degree of permanence". Secondly, it is identified that "settlement boundaries do not need to be continuous, in some instances the nature and form of the settlement may make it appropriate to define two or more	These comments are best addressed to CBC. If CBC accept the arguments put forward and amend the Local Plan, and that is Adopted after the NP is Made, then the CBC Limits to Development will be the ones that will take precedence as the latest Plan to be incorporated in the Development Plan.	None

				settlement elements”.		
				In considering the appropriate Limits to Development for Woodhouse Eaves, the Assessment states that “Brand Hill House is physically detached from neighbouring properties and, as such, was considered to be outlying and is not included within the settlement limit”.	This is a matter for CBC.	None
136		H3: Limits to Development	Andrew Granger on behalf of Mr Mattu	We fundamentally disagree with this assessment of the Client’s existing property and the Site. The property appears as a consistent part of the built form for the village when viewed from the street-scene. It is our view that there is no clear evidence of a change in character between Charnwood House (which is included within the proposed Limits) and Brand Hill House, when moving south along Brand Hill. Similarly, Brand Hill House is also viewed the context of the properties on Lady Martin Drive, which are situated further south along Brand Hill than the aforementioned property. Consequently, we believe there is no justification for excluding the Client’s existing property from the proposed Limits to Development.	The assessment was undertaken by CBC and not by the NP so these comments should be directed to CBC.	None
137		H3: Limits to Development	Andrew Granger on behalf of Mr Mattu	Furthermore, on the basis that the Limits to Development should follow defensible boundaries, it is our view that the mature tree belt which marks the southern boundary of the Site (Land adj. Brand Hill House) would be an appropriately defensible boundary on which to base the southern edge of the Limits and would more accurately reflect the change in character between built form and open countryside within this part of the village.	Again, this comment should be directed to CBC. The NP cannot influence the Settlement Limits to Development Assessment that they undertook in 2018.	None
138		H6: Design Standards	Andrew Granger on behalf of Mr Mattu	Paragraph 124 of the Framework identifies that “the creation of high quality buildings and places is fundamental to what the planning and development	Noted	None

				<p>process should achieve. Good design is a key aspect of sustainable development, creates better places in which to live and work and helps make development acceptable to communities. Being clear about design expectations, and how these will be tested, is essential for achieving this". In light of the above, we fully support the overarching principles and objectives of Policy H6: Design Standards of the emerging Woodhouse Neighbourhood Plan.</p>		
139	Part E	H6:Design Standards	Andrew Granger on behalf of Mr Mattu	<p>However, we would suggest that Clause (e) of this policy is overly restrictive by setting out the specific measures that would be required in order to demonstrate a proposal appropriately enhances biodiversity value. It is our view that there a number of other opportunities to enhance biodiversity that are not referenced within the policy and, therefore, at present would not be considered appropriate. For example, the emerging Charnwood Local Plan recognises that biodiversity net gain can be achieved through the following methods:</p> <ul style="list-style-type: none"> •Wildflower meadows, urban woodland & community woodland •Sustainable drainage systems which may benefit wildlife •Removing barriers to wildlife movement and restoring connections; and •Planting suitable trees and shrubs in landscaping 	<p>We disagree.</p> <p>The opening paragraph to the policy explains that the clauses should be incorporated 'as appropriate and relevant to the development concerned' whilst the clause e) itself says development '... should be enhanced ...' and offers the items identified as examples. It does not preclude other opportunities for biodiversity enhancement.</p> <p>The policy is not, therefore overly prescriptive as suggested.</p>	None
140		H6:Design Standards	Andrew Granger on behalf of Mr Mattu	<p>Consequently, in order to ensure the policy criteria is not overly-restrictive and makes provision for all appropriate opportunities to achieve biodiversity net gain, we would recommend amending criteria (e) to the following:</p>	<p>We believe that the policy as worded achieves the desired aim.</p>	None.

				“Development should be enhanced by fostering biodiversity and relate well to the topography of the area, with existing trees and hedges preserved whenever possible. Proposals which provide appropriate measures for achieving a measurable net gain in biodiversity will be particularly supported”		
141		ENV4	Andrew Granger on behalf of Mr Mattu	In accordance with Paragraph 170 of the Framework, which establishes the requirement for planning policies and decision to minimise impacts on and private net gains for biodiversity, and in the context of the emerging Environmental Bill, which will introduce a statutory requirement to deliver a minimum 10% biodiversity net gain on all development proposals, we fully support the provisions of Policy ENV4 of the emerging Neighbourhood Plan which seeks to protect and enhance local biodiversity in the Parish.	Noted	None
142		ENV4	Andrew Granger on behalf of Mr Mattu	In this respect, any application for the proposed development on the Client’s Site would be supported by a Phase I Ecological Appraisal, which would assess the Site’s ecological value and identify appropriate measures to enhance this value through the development proposals.	Noted	None
143		ENV4	Andrew Granger on behalf of Mr Mattu	We would recommend a minor modification to remove the specific reference to development of “one or more houses”. The current drafting risks preventing other forms of development, such as commercial, retail or leisure, from being required to meet the provisions of the identified policy. Excluding these alternative forms of development from being required to protect and enhance biodiversity value would not be consistent with the provisions of the Framework and the emerging Environmental Bill. As such,	Agreed	Change to be made as indicated

				we would recommend the following amended wording: “Proposals for new development should incorporate measures for the protection and enhancement of local biodiversity, as follows: ...”		
144		ENV8	Andrew Granger on behalf of Mr Mattu	Paragraph 31 of the Framework states that all planning “policies should be underpinned by relevant and up-to-date evidence. This should be adequate and proportionate, focused tightly on supporting and justifying the policies concerned”. Likewise, the PPG is clear that Neighbourhood Plan policies should be underpinned by proportionate and robust evidence that explains the intention and rationale of the policies in the draft Plan (Ref: Section 41 Paragraph 040).	Noted	None
145		ENV8	Andrew Granger on behalf of Mr Mattu	In light of the above, it is our view that Draft Policy ENV8: Protection of Important Views is not supported by the necessary evidence to justify the proposed designations. The emerging Neighbourhood Plan states that the allocation of the identified view has been supported by the environmental inventory, however, the Plan notes that this document was not prepared with principal aim of supporting this policy.	It is considered that the evidence underpinning the policy as described in Appendix 9 is relevant, up to date, adequate and proportionate and therefore meets the requirements.	None
146	Appendix 6	ENV8	Andrew Granger on behalf of Mr Mattu	In this regard, the Environmental Inventory Scoring Matrix identifies that the allocated views were assessed as part of the scoring for “Beauty” undertaken for each of the individual sites included within the Inventory. However, the scoring matrix provides no details as to how these views were assessed, who undertook the assessment, or what qualified a site as being considered to be beautiful?	The descriptions in Appendix 9, coupled with the images of the views demonstrates why they are deemed special to the local community in a way that is proportionate and appropriate for a Neighbourhood Plan.	None
147	Appendix 9	ENV8	Andrew Granger on behalf of Mr	Furthermore, the Important Views Document simply maps and documents the various views that have been	There is no requirement on a neighbourhood plan to provide formal, specialist studies to	None

			Mattu	designated in the emerging Neighbourhood Plan. This document provides no assessment of why these views are valued, or any form of independent, objective analysis about the quality of these views. As such, we consider that no formal assessment has been undertaken to appropriately analysis the views and provide clear justification for why the designated views are considered to be worthy of special protection.	evidence the importance of the views. The views were chosen by a group of residents who know the area best and are best placed to assess relative importance.	
148		ENV8	Andrew Granger on behalf of Mr Mattu	In respect of the above, the Charnwood Forest Regional Park Landscape Character Assessment, produced by FPCR in 2019, identifies that key views of Woodhouse Eaves are possible from the east of the village, and that key views within the settlement follows the main roads. This provides some clear indication that the views designated within the draft Neighbourhood Plan do hold some specific value, however, it does not provide the specific, proportionate evidence to justify the individual vantage points which are proposed for designation.	We disagree and contend that the views selected have been produced in a proportionate and relevant manner.	None
149		ENV8	Andrew Granger on behalf of Mr Mattu	Therefore, in order to meet the requirements of Paragraph 31 of the Framework, and the PPG, we believe that formal assessment, in the form of an appropriate Landscape and Visual Appraisal, needs to be undertaken in order to fully justify the proposed designations included within Policy ENV8: Protection of Important Views.	We disagree that formal, technical assessments are required. This is not necessary in producing neighbourhood plans where the requirement for evidence to be proportionate is key.	None
150		T3: Electrical Vehicles	Andrew Granger on behalf of Mr Mattu	Finally, in accordance with Paragraph 148 of the Framework, which identifies the planning system's role in supporting the transition to a low carbon future, we fully support the principles of Policy T3: Electric Vehicles and the requirement for	Noted.	None

				residential development proposals to provide appropriate electric vehicle charging provision.		
151		T3: Electrical Vehicles	Andrew Granger on behalf of Mr Mattu	The Government's recent Future Homes Consultation paper proposes amendments to the Building Regulations which would all homes built from 2025 to deliver 75-80% reductions in CO2 emissions compared to homes built today. In addition, the Planning for the Future White Paper indicates that all homes built under the Future Homes Standard would be "net zero carbon ready", with the ability to become fully zero carbon over time, as the electricity grid continues to decarbonise and, therefore, reducing the need for retrofitting.	Noted	None
152		T3: Electrical Vehicles	Andrew Granger on behalf of Mr Mattu	Similarly, for non-residential development it is anticipated that Government will introduce similar requirement i.e., all non-residential properties to be developed as being net zero carbon ready, in due course.	Noted	None
153		T3: Electrical Vehicles	Andrew Granger on behalf of Mr Mattu	In light of the above, it is our view that there is no evidence to justify restricting the requirements of Policy T3 to residential development proposals only. As a guidance, it is noted that the emerging Charnwood Local Plan (Regulation 18) Consultation document includes a requirement for non-residential developments that have at least 100 car parking spaces to make provision for at least 20 electric charging points. Therefore, we believe that it would be appropriate for Draft Policy T3 of the emerging Neighbourhood Plan to also impose a requirement for non-residential development to make sufficient provision for electric vehicle charging.	Agreed. We will require commercial as well as residential development to incorporate provision for electric vehicle charging points. Policy to change to: Residential development of one dwelling or more and commercial development should provide a minimum of 7kW cabling to the most practical point to facilitate subsequent installation of an electric vehicle charging point'.	Change to be made as indicated.
154		H6	Andrew Granger on	On a related note, the Neighbourhood Plan's desire to plan positively for the	Agreed.	Change to be made as indicated.

			behalf of Mr Mattu	reduction in carbon emissions is admirable and should be commended. In this respect, we believe that it may be appropriate for the Neighbourhood Plan Group to consider the application of these principles across all policies of the emerging Neighbourhood Plan. For example, in view of the emerging requirements established within the Future Homes Consultation Paper, it may be appropriate for draft Policy H6: Design Standard to include a requirement for all new development proposals to be built to the Future Homes Standard, unless it can be demonstrated that this would not be viable.		
155		Conclusion	Andrew Granger on behalf of Mr Mattu	On behalf of our Landowner Client, Mr M Mattu, we are seeking to work with Charnwood Borough Council and Woodhouse Parish Council in promoting the land adjacent to Brand Hill House, Brand Hill, Woodhouse Eaves for formal allocation within the Limits to Development, to enable a small-scale residential development for 1no. self-build dwelling to be progressed.	Noted	None
156			Andrew Granger on behalf of Mr Mattu	We fully support the use of the standard method for determining the minimum number of homes that should be accommodated within strategic policies. However, in light of the proposed revised standard method and the formal declaration of unmet housing needs arising from Leicester City Council, we are concerned that the Woodhouse Neighbourhood Plan (Regulation 14) consultation fails to allocate sufficient land to meet the up to date evidence of housing need for the area. Therefore, the Plan is at high risk of being considered out-of-date after two years of being made (as per of the Written Ministerial	Noted. We disagree with this assessment.	None

				Statement) and/or being superseded by the requirements and provisions that will be established by the emerging Charnwood Local Plan 2019-2036 when that document is adopted.		
157		H2	Andrew Granger on behalf of Mr Mattu	Furthermore, we also have significant concerns about the housing land supply identified within the emerging Neighbourhood Plan. In particular, on the basis of the current evidence, the proposed Reserve Site allocations cannot be considered available and, therefore, are not deliverable. Similarly, we also have concerns as to whether the requirement of Policy H2 for these sites to provide affordable housing can be viably delivered in the context of the economic difficulties resulting from the Covid-19 pandemic.	Noted. This comment refers to the reserve sites which the NP is not relying on to meet its housing target. Noted	None None
158			Andrew Granger on behalf of Mr Mattu	In addition, it is our view that there is currently no evidence to quantify and justify the level of windfall development anticipate to form part of the housing land supply for the Plan Area. As such, further evidence is required on the historic rate of windfall development and, as such, the projected rate of future delivery. In this respect, the Client's proposals are considered to constitute an appropriate windfall development scheme.	We believe that the evidence is apparent, but will strengthen the narrative preceding the policy to stress this point	Change to be made as indicated.
159			Andrew Granger on behalf of Mr Mattu	Moreover, we contend that the emerging Woodhouse Neighbourhood Plan fails to identify sufficient sites to deliver the identified needs for affordable housing within the Parish, and similarly, fails to provide an appropriate tenure mix to meet the specific housing needs for the Parish.	The Affordable Housing need will be met from existing dwellings as well as new build. The tenure mix will be determined by reference to an up to date housing needs assessment.	Change to be made as indicated.
160			Andrew Granger on behalf of Mr Mattu	In respect of the proposed Limits to Development, we believe that there is no justification for excluding the Client's existing property from the proposed Limits. The property appears as a	This comment is better directed at CBC.	None

				consistent part of the built form for the village when viewed from the street-scene and there is no evidence of a change in character between the adjacent properties, which are included within the Limits, and the Client's property, which is excluded. Furthermore, given that the Limits to Development should following defensible boundaries, where possible, it is our view that the mature tree belt which marks the southern boundary of the proposed development site would be an appropriately defensible boundary on which to base the Limits to Development for the village, and would more accurately reflect the change in character between the built form and the open countryside.		
161		ENV8	Andrew Granger on behalf of Mr Mattu	We consider that Draft Policy ENV8: Protection of Important Views is not supported by the necessary, robust evidence that is required to justify the special protection to be afforded to the allocated views, as per Paragraph 31 of the Framework. Consequently, it is our view that a formal assessment, in the form of an appropriate Landscape and Visual Appraisal needs to be undertaken in order to support the proposed designations.	Paragraph 31 of the Framework is primarily directed at Local plans. The evidence provided in Appendix 9 is proportionate for a Neighbourhood Plan.	None
162			Andrew Granger on behalf of Mr Mattu	Finally, the Neighbourhood Plan's desire to plan positively for the reduction in carbon emissions is admirable and should be commended. In this regard, we believe that it may be appropriate for the Neighbourhood Plan Group to consider the application of these principles across all policies of the emerging Neighbourhood Plan.	Noted	Change to be made as indicated.
163			Andrew Granger on behalf of Mr Mattu	Andrew Granger & Co. would like to remain involved throughout the preparation of the Woodhouse NP and, therefore, request to be informed on any future consultation opportunities.	Noted	None

164		H2	Resident	<p>If we have any development at all it should be kept away from Beacon Road as the traffic, parking & pollution is now a real problem especially in the rush hours and on Sundays.</p> <p>Brown field sites within the village itself are the most desirable and palatable solution for all local people we have spoken to.</p>	Noted. The sites allocated for development within the Neighbourhood Plan are all brownfield sites.	None
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