

East Langton Neighbourhood Plan – Second landowner consultation (24th July to 4th September)

Summary of representations submitted by Harborough District Council to the independent examiner pursuant to Regulation 17 of Part 5 of The Neighbourhood Planning (General) Regulations 2012

Name	Policy	Full Representation	Qualifying Bodies Response
<p>Andrew Granger and Co Phoenix House 52 High Street Market Harborough</p> <p>On behalf of landowner</p>		<p>Our representation is framed in the context of the requirement for the Neighbourhood Plan to be considered legally compliant and sound. The tests of soundness are set out at Paragraph 182 of the National Planning Policy Framework (NPPF), which state that for a development plan to be considered sound it must be:</p> <p>Positively prepared: the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</p> <p>Justified : the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</p> <p>Effective: the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and</p> <p>Consistent with national policy: the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</p>	

	<p>Policy S1</p> <p>Policy ENV4</p> <p>Policy DBE1</p>	<p>We support the vision and objectives of the Neighbourhood Plan and the need to accommodate an appropriate level of development. In light of this, we support Policy S1: Presumption in Favour of Sustainable Development in line with Paragraph 14 of the NPPF, and policies relating to the provision of a mix of housing opportunities. We also support the protection of heritage assets, such as Ridge and Furrow, as advocated by Policy ENV4 of the Neighbourhood Plan.</p> <p>However, we are concerned about the robustness of the Plan and its supporting evidence base, and whether it is considered 'justified' in the context of the tests of soundness. In particular, we are concerned about the environmental proposals contained within the Neighbourhood Plan and the lack of clarity in relation to the site assessment process that has underpinned these proposals. For example, Policy DBE1 : Protection of the Built Environment - Conservation Area and Listed Buildings refers to the Conservation Area Boundary identified at Appendix 1, and states 'Proposals within a Conservation Area or affecting the setting of these Conservation Areas or a listed Building will be expected to preserve and enhance them'. Land to the south of Back Lane, East Langton sits adjacent to the boundary of the East Langton Conservation Area, and as such it is reasonable to suggest that this land may contribute to its setting. However , the Environmental Inventory that is to support the environmental proposals has not made any assessment of this site's heritage value or the extent of any contribution it may make to the Conservation Area. As such, we consider it necessary for the site to be assessed for its contribution to the setting of the East Langton Conservation Area and, where appropriate, protected by Policy DBE1.</p> <p>We propose that further sites, identified at Appendix 1 (hatched red) should be identified and designated as 'Environmentally Significant Sites', further to the designations proposed in the emerging Neighbourhood Plan and shown at Appendix 2, for reference. Figure 12 should also be updated to reflect the proposed amendments. As a result of recent approvals to the south of the village, vehicular</p>	<p>Noted.</p> <p>Noted.</p> <p>Policy DBE1 reflects support for national designations. Land adjacent to the Conservation areas such as Back Lane will be covered by national policy and policy DBE1.</p> <p>Concern for the area in question is noted, however a thorough process of identifying locally important sites was undertaken and was shared with the community at open events prior to the NP being finalised. No additional sites were identified through this process.</p>
--	--	--	---

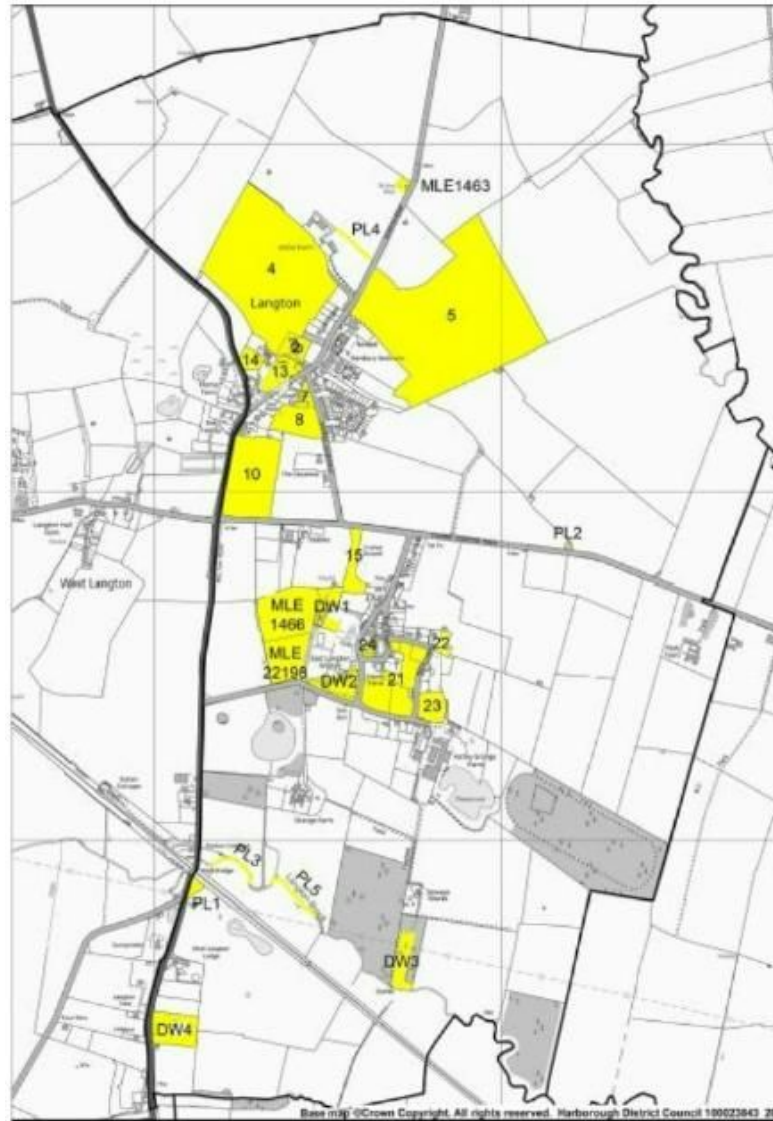
	<p>Policy ENV5</p>	<p>movements along Back Lane have increased significantly, including large lorries and HGVs. It is considered that this does not appropriately preserve or enhance the designated Conservation Area and has a significant impact on local residents. Non designation of these sites and potential future development will have a material impact on the Conservation Area and surrounding Heritage Assets.</p> <p>Policy ENV5: Protection of Important Views prevents any development that impacts on the allocated Important Views, unless in exceptional circumstances. It is our opinion that an evidence base to support this policy has not been clearly provided and/or it does not sufficiently justify the allocations as required by Paragraph 182 of the NPPF. The supporting text for the Policy states '<i>One of the main ways in which residents expressed this wish [to protect the Parish's rural setting] was by describing a number of important views within, between, away from and toward the two villages. These consultation findings were supported by the environmental inventory, which although principally aimed at identifying sites of environmental significance also confirmed the sight lines of the suggested views and mapped them</i>'. </p> <p>The Environmental Inventory referred to above provides no evidence which would support the allocations of Important Views, as has been suggested. There is no explanation within the Neighbourhood Plan or supporting documents which outlines the criteria for consideration as an Important View, and there are no details of how views were assessed or which ones were selected for assessment</p> <p>It is our understanding that during an initial Neighbourhood Plan Open Event held in December 2014, residents were asked to mark on a map, locations where they would or would not want housing development to take place, and open space and important views they would like to be protected. A map of the consultation results is included at Appendix 4. Locations marked by a green dot on the map are locations of important views identified by residents. It is</p>	<p>The NP shares concerns over the employment growth on Back Lane and has introduced policies relating to employment and transport to seek to control this growth and mitigate its impact.</p> <p>The process of identifying the most important views locally was undertaken through a range of methods including the dot exercise referred to by the respondent along with walks around the village by groups of people through the development of the Neighbourhood Plan. The views identified were shared with the community at well-attended open events prior to pre-submission consultation and are described in a separate document in the supporting information shared with the community and stakeholders during Regulation 14.</p> <p>The same process was followed in the Wymondham and Edmondthorpe NP which has recently passed Examination. The Examiner here stated 'I consider that it is entirely a matter for the discretion of the local community to identify what it considers are important viewpoints to be protected.'</p> <p>The evidence-base for the NP is required to be proportionate to a Neighbourhood plan and the process undertaken at East Langton for identifying important views followed the same process as other NPs that have passed Examination, including Wymondham and Edmondthorpe and Hungarton.</p> <p>We believe it is too late in the process for additional or alternative views to be re-considered and point out that a recommendation of this sort</p>
--	--------------------	--	--

		<p>noted that a number of locations to the south of East Langton have been identified by residents as being important; however there has been no formal assessment of views from these locations included within the evidence base for the Neighbourhood Plan.</p> <p>We consider that a robust selection process of Important Views should be documented, which would include an assessment of all key views into, between and out of the villages and a photographic record of these views. In particular, we consider that the views to the south of East Langton towards the railway line should be assessed; including those from the Public Footpath which runs to the south from the Back Lane/ Ma in Street junction identified at Appendix 3. In our opinion, the views to the south from this location are more valuable than those which the submitted Neighbourhood Plan seeks to allocate. As such, we request that an appropriately robust evidence base is provided to support the proposed allocation of Important Views, which should include details of the assessment process.</p> <p>Therefore, whilst we support the vision and objectives of the East Langton Neighbourhood Plan, we are concerned that a number of the Environmental Proposals are not justified by an appropriate evidence base as required by Paragraph 182 of the NPPF. As such, we consider it necessary for sites adjacent to the Conservation Areas to be assessed for their contribution to the setting of these Heritage Assets.</p> <p>Furthermore, we believe that the selection and assessment process of the Important Views needs to be appropriately documented and this should include an assessment of the views from the Public Footpath running south from the Back Lane/Ma.in Street junction in East Langton (as set out at Appendix 3).</p> <p>We would be grateful if the examination of the Neighbourhood Plan is considered in light of the above comments.</p>	<p>from one stakeholder would not be demonstrably representative of the community's wishes.</p> <p>The views document was supplied as part of the supporting information and is attached for reference</p>
--	--	--	--

Appendix 1: Conservation Area Boundary






Appendix 2 – Identified Environmentally Significant Sites



Appendix 3 – Proposed Important View



-  Potential area for contribution to Conservation Area setting
-  Public Footpath
-  Potential Important Views

**Appendix 4 – Neighbourhood Plan Open Event Consultation Results
December 2014**



**Andrew Granger and
Co
On behalf**

**On behalf of our client, the Leicester Diocesan Board of Education,
we have sought to work with the East Langton Neighbourhood Plan
Group, in promoting the subject site, Land rear of The Hanbury**

<p>The Leicester Diocesan Board of Education</p>		<p>Centre, Stanton Road, Church Langton (Appendix 1) for residential development.</p> <p>This document provides a written submission to the examination of the East Langton Neighbourhood Plan and is framed in context of the requirement for the Neighbourhood Plan to be considered legally compliant and sound. The tests of soundness are set out at Paragraph 182 of the National Planning Policy Framework [NPPF], which state that for a development plan to be considered sound it must be:</p> <p>Positively prepared - the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;</p> <p>Justified - the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;</p> <p>Effective - the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and</p> <p>Consistent with national policy - the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.</p> <p>2. Planning Context</p> <p>2.1. We have made Harborough District Council [HOC] aware of the site's availability for development through various submissions, including the 'Call for Sites' as part of the Strategic Housing Land Availability Assessment [SHLAA]. We have also submitted a response to the HOC Local Green Space Consultation in which we have</p>	<p>Information relating to the revised development proposal is noted. The site in question represents the only useable open space of any significant size in Church Langton and is a very popular location for people walking dogs and enjoying recreational</p>
---	--	--	---

	<p>objected to the designation of the site as Local Green Space.</p> <p>2.2. We have informed the East Langton Parish Council of the site's development potential. The Parish Council was informed that the site was being promoted for residential development at a meeting on 23rd December 2015.</p> <p>2.3. Church Langton has been identified by HOC (in the adopted Core Strategy) as a Selected Rural Village and as such is required to accommodate a level of residential development in keeping with the existing built form and character of the village. This is further emphasised by the fact that HOC is currently unable to demonstrate a 5 year supply of deliverable housing land. Therefore, in line within guidance contained within the NPPF, the development framework and housing policies are deemed out of date and the presumption in favour of sustainable development prevails.</p> <p>2.4. An outline planning application for the erection of 9 dwellings with associated vehicular access was submitted and subsequently withdrawn by Andrew Granger & Co. on behalf of the client. A public consultation event was held in Church Langton Community Centre on Tuesday 6th September 2016, where details about the proposal were made available to members of the public.</p> <p>2.5. At this consultation event, residents highlighted their concerns about the limited recreational facilities within the village, and as such our clients are seeking to address this issue through a revised application for 5 dwellings, with a formal Children's Play Area, and associated vehicular access. Further details of this proposal will be made available to members of the public as they are formulated.</p> <p>3. Site and Development Potential</p> <p>3.1. The developable area of the site, outlined in red in Appendix 1, measures approximately 1.74 acres and sits adjacent to the Planned Limits to Development for Church Langton as designated by Harborough District Council.</p>	<p>facilities with children such as kicking a football.</p> <p>In addition to being a proposed Local Green Space designation in the NP, the site is a Harborough District Council designated 'Open Space Sports and Recreation' facility. The NPPF makes it clear that development on OSSR sites will only be possible if 'the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location.' No such alternative provision has been identified by the landowners and the open space in question is valued very highly, and used regularly, by residents.</p> <p>The development proposal for 5 dwellings will no doubt be resisted strongly once received, in particular given the planning proposal for 16 dwellings on land adjacent to the land under consideration here (see Brudenell Estate response below).</p>
--	--	---

		<p>3.2. The site consists of a single paddock, has clear boundaries and is surrounded by residential properties to the south on Thornton Crescent, and to the west on Old School Walk; by the school playing fields to the north, and by agricultural fields to the east.</p> <p>3.3. The site is well placed with regards to its proximity to local services within Church Langton, including the Church of England Primary School which borders the site, as well as a Public House and 14th Century Church .</p> <p>3.4. The site is in a highly accessible location, public transport links provide access to wider service and employment opportunities in Market Harborough {approx. 4.8 miles}. The site also has access to the Kibworths {approx. 3.1 miles}, Great Glen {approx. 6.8 miles}, and Leicester City Centre (approx. 12.8 miles), all via the A46.</p> <p>3.5. We propose that the site could deliver approximately 5 dwellings, with associated garaging and vehicular access. In line with the aims of the Neighbourhood Plan, the development could deliver a mix of dwelling types and sizes.</p> <p>3.6. The proposed development will also include a formal Children's Play Area, which would include a range of quality equipment.</p> <p>3.7. The public footpath which crosses the site could be retained in its current position; and the site is not in an area of significant flood risk, and sits adjacent to the Church Langton Conservation Area .</p> <p>3.8. Therefore, we consider the site to provide a significant development opportunity.</p> <p>4. Comments on the East Langton Neighbourhood Plan</p> <p>4.1. On behalf of the Leicester Diocesan Board of Education , we</p>	
--	--	--	--

		<p>wish to make the following observations on the East Langton Neighbourhood Plan. Overall, we agree with the visions and objectives set out in the Neighbourhood Plan, however to ensure that the plan is robust, provides flexibility and is consistent with the strategic planning aims for the District, we make the following comments.</p>	
	Policy S1	<p>4.2. In respect of Policy S1: Presumption in Favour of Sustainable Development, we strongly support the inclusion of this policy within the East Langton Neighbourhood Plan in line with Paragraph 14 of the NPPF. We are encouraged by the Parish Council's desire to positively consider proposals that contribute to the sustainable development of the Plan area.</p>	Noted.
	Policy H1	<p>4.3. We have significant concerns about Policy H1 : Housing Provision and its ability to meet the strategic housing requirement for the Parish, which are to be identified within the emerging Local Plan. We consider that proposals to meet the identified housing need solely through windfall development and infill sites does not constitute a robust housing strategy and does not ensure that the Neighbourhood Plan can meet the future development needs as required.</p> <p>4.4. The supporting text for this policy on Page 18 identifies that the strategic housing requirement for the whole Parish has not yet been identified, but initial indications suggest that it will be at least double the previously identified requirement for 17 dwellings in Church Langton alone. As such, based on the current information, the housing requirement for the Parish is expected to be a minimum of 34 dwellings.</p>	<p>In the draft Local Plan, the Parish of East Langton is described as a 'Selected Rural Village' where the approach to development is described as: 'Development should be primarily in the form of small-scale infill developments or limited extensions to help address economic, social or community objectives.' The NP reflects this approach to development.</p> <p>The draft Local Plan identifies a minimum requirement of 30 for the Parish up to 2031. This level is recognised on page 19 of the NP.</p> <p>In order to address this increase in housing requirement, the decision was taken to remove the proposed limits to development from the Submission version of the NP – a move designed to allow more flexibility in meeting the housing requirements.</p>
	Policy H2	<p>4.5. The supporting text for Policy H2: Windfall Sites included on Page 20 of the Plan states 'this type of development [windfall and</p>	<p>The housing requirement identified in the proposed submission Local Plan published in July 2017 is for a</p>

	<p>Policy H2</p>	<p>infill development] has provided a source of new housing in Church Langton averaging two dwellings a year'. Consequently, by projecting this average rate of development over the 16 year housing period included within Policy H1 , it is reasonable to suggest that windfall and infill development alone would only produce approximately 32 dwellings.</p> <p>4.6. This is not sufficient to meet the predicted Parish wide requirement of a minimum of 34 dwellings and as such the Plan cannot be considered to be consistent with local planning policies. Therefore, we would advise that it would be more beneficial to allocate development sites as part of the Plan; this would provide the community with greater control over development, rather than small sites coming forward on an ad-hoc basis. In addition, potential windfall sites may not currently be available for development and land owners may not be interested in making their land available.</p> <p>4.7. A logical resolution to this issue would be to delay the formal examination and adoption of the Neighbourhood Plan until the strategic housing requirement for the Parish has been confirmed by the emerging Local Plan. This would allow the Parish to positively plan to meet its minimum development requirements; which we consider to be suitably achieved through the allocation a small number of small scale development sites.</p> <p>4.8. With regards to Policy H2: Windfall Sites, we are particularly concerned by Criteria A included in the policy. It states that infill housing will be supported where:</p> <p>'It is within the existing built up area of the villages of Church Langton and East Langton (as defined by the Limits to Development identified)'</p> <p>The inclusion of Limits to Development within this criterion conflicts with the supporting statements included on Page 19 of the</p>	<p>minimum of 30 dwellings– so the comment 'it is reasonable to suggest that windfall and infill development alone would only produce approximately 32 dwellings' appears wrong. This in fact confirms that this policy is appropriate.</p> <p>This requirement has been updated to 30, therefore the NP is entirely consistent with local planning policies.</p> <p>This suggestion is rejected. Housing numbers are likely to change over the course of the Plan period and it is recognised that NPs can come forward in advance of the Adoption of Local Plans.</p> <p>This was an error in the drafting of the Submission version. The Parish Council</p>
--	------------------	--	--

	<p>Policy H3</p> <p>Policy ENV1</p>	<p>submitted Plan, whereby it states:</p> <p>'It has therefore been agreed that in response to the pre-submission consultation and the fluctuating position in relation to the numbers of new houses required in the Parish, the Limits to Development would be removed and planning applications determined on the basis of policies within this Neighbourhood Plan and Development Plan for Harborough District Council'</p> <p>Furthermore HDC are proposing to remove Limits to Development from the emerging Local Plan, when it is published for consultation in September 2017, and instead utilise a criteria- based policy. Therefore, in order to ensure that the Neighbourhood Plan does not conflict, with earlier statements included in the Plan or with the emerging Local Plan, we would advise the removal of any reference to Limits to Development within Criteria A of Policy H2.</p> <p>4.9. We fully support Policy H3: Housing Mix and the Neighbourhood Plan's recognition of the need to provide 2 and 3 bedroom homes, as well as accommodation that is suitable for elderly people. We propose that development of our client 's site can help to meet t his objective.</p> <p>4.10. We strongly object to the inclusion of our client's land as a Local Green Space within Policy ENV1 : Protection of Local Green Spaces. Local Green Space is a highly restrictive and significant policy designation that has been given the equivalent stat us to Green Belt designation . Paragraph 77 of the NPPF is unequivocal in stating that Local Green Space designation is not appropriate for most green areas or open spaces, and as such it is considered entirely logical and reasonable that the allocation of any land in this manner should be underpinned by compelling evidence to demonstrate that it is appropriate and justified.</p> <p>4.11. The specific evidence about how and why the Local Green Spaces have been chosen for designation in the Neighbourhood Plan</p>	<p>submitted a response to regulation 16 as follows:</p> <p>'Policy H2 a) currently says 'a) It is within the existing built up area of the villages of Church Langton and East Langton (as defined by the Limits to Development identified, see fig 2);</p> <p>This should have been omitted in the final draft. Please disregard this part of policy H2 a)'. Noted.</p> <p>This comment is noted. The NPPF makes it clear that LGS designation will not be suitable for most areas of open space (there are only 5 spaces proposed across two villages); demonstrably special to the local community (it attracted a great deal of support at consultation events and large numbers of people objected to the proposed development promoted by Andrew Granger on behalf of the Leicester Diocesan Board of Education) and is local in character. The submission from SAndrew Granger has confirmed that this is a bounded parcel of land, accessible and in close proximity to local facilities. The process of identifying LGS is the same</p>
--	-------------------------------------	---	--

		<p>is limited to a few short sentences in the environmental inventory submitted as an Appendix to the Neighbourhood Plan. We do not consider that this constitutes the robust and compelling evidence that is required by Paragraph 77 of the NPPF.</p> <p>4.12. Furthermore, the Planning Practice Guidance is clear that the designation of any Local Green Space needs to be consistent with local planning policies for sustainable development in the area. In particular, local and neighbourhood plans are required to identify sufficient land in suitable locations to meet identified local needs; the allocation of Local Green Space is not to be used in a manner that undermines this central aim of plan-making. The proposed allocation of Local Green Space on this site would do just that.</p> <p>4.13. The amount of housing that might be required to be accommodated within the East Langton Parish as part of the emerging HOC Local Plan has not been fully established or scrutinised in relation to the duty to co-operate which is to be set out in the emerging Leicestershire Strategic Growth Plan. The designation of Local Green Space could therefore undermine the aims of the Local Plan by reducing the capacity of the Parish to accommodate residential development. As such, allocation of our client's site would pre-determine and undermine any decision about the level of residential development to be accommodated within the East Langton Parish, without any compelling evidence for doing so. This is despite Neighbourhood Plans having a clear mandate, as set out in Paragraph 182 of the NPPF, about their required consistency with national and local planning policies.</p> <p>4.14. Similarly, we are concerned about the cumulative impact that the environmental proposals contained within the Neighbourhood Plan has on pre-determining and undermining any decision about the level of residential development to be accommodated within the Plan Area. In line with the NPPF and local planning policies contained within the adopted HOC Core Strategy,</p>	<p>that has passed Examination at Thurcaston and Cropston; Hungarton, Great Easton, North Kilworth, Great Glen and Wymondham and Edmondthorpe and is therefore an appropriate and proportionate approach suitable for neighbourhood planning.</p> <p>We disagree. The identification of this site as LGS is specifically as a result of its environmental features. The logical extension of this argument is that ANY LGS designation would undermine plan-making and this is not the case. The fact that a development proposal has already been put forward for 16 dwellings on an adjacent site is a clear demonstration that other sites are available within the Parish.</p> <p>See above.</p> <p>This is not accepted.</p> <p>Policy env 2 seeks to protect the significant features of the sites in question, not to prevent development altogether. As has already been referenced, the proposal for a 16 dwelling</p>
--	--	---	---

		<p>we fully support the desire of the local community to protect their biodiversity and heritage assets and important local views, as well as maintaining an area of separation between Church Langton and East Langton.</p> <p>4.15. However, the level to which these environmental designations have been proposed is highly restrictive in allowing any future residential development to come forward. As demonstrated by Figure 12 in the submitted Plan , it has resulted in all reasonable development sites, within or adjacent to the existing settlement boundaries, being covered by an environmental proposal of some format which will constrain their development. This fundamentally contradicts with Core Planning Principles outlined at Paragraph 17 of the NPPF, which states that 'planning should not simply be about scrutiny, but instead be a creative exercise in finding ways to enhance and improve the places in which people live their lives' .</p> <p>4.16. Furthermore, these environmental allocations have been proposed without any detailed and compelling evidence for their inclusion. For example, the supporting text for Policy ENV5: Protection of Important Views, included on Page 54 of the submitted plan states 'these consultation findings were supported by the environmental inventory, which although principally aimed at identifying sites of environmental significance also confirmed the sight lines of suggested views and mapped them'. However, the environmental inventory contains no details about the proposed important views, and there are no details about which views were assessed and how the process was undertaken. In addition, it is concerning that the environmental inventory is being openly used as evidence for a policy that it was not designed to underpin, it questions the extent to which it has been inappropriately used as justification for other policies in the plan.</p> <p>4.17. Therefore, we consider the proposed environmental designations undermine the ability of the Neighbourhood Plan to meet any residential development requirement for the Parish</p>	<p>development in the Parish which is outside of any area of environmental protection demonstrates that development opportunities remain available.</p> <p>This approach has been successfully undertaken in a range of NPs that have passed examination and is considered to be an appropriate and proportionate approach to identifying environmentally important features.</p> <p>This is not agreed. It is suggested that sufficient scope exists for future development within the Parish and the Parish Council has facilitated this by</p>
--	--	--	---

	<p>identified in the emerging Harborough District Council Local Plan. This is despite Neighbourhood Plans having a very clear mandate about the required consistency with national and local planning policies. As such, we suggest that formal examination and adoption of the Neighbourhood Plan should not be completed until these policies are supported by detailed and compelling evidence, and revised in a manner ensures they do not undermine the strategic objectives of the emerging HOC Local Plan.</p> <p>5. Conclusion</p> <p>5.1. The allocation of the site as Local Green Space through the submitted Neighbourhood Plan does not reflect the wishes of the landowner, and does not utilise the significant development potential that the site has in helping to achieve the wider vision and objectives of the East Langton Neighbourhood Plan.</p> <p>5.2. Furthermore, this Local Green Space allocation, and all other environmental proposals included within the Neighbourhood Plan, significantly undermines the ability of the Plan to meet its strategic housing requirements that are to be determined in the emerging Harborough District Council Local Plan. This is despite Neighbourhood Plans having a very clear mandate about their required consistency with national and local planning policies.</p> <p>5.3. We believe that the site has the potential to provide 5 dwellings, a formal Children's Play Area, and associated vehicular access. To ensure that the Neighbourhood Plan has a robust strategy in place for the delivery of new homes and dealing with any future increased demand, we propose that our client's land (Appendix 1) is allocated, along with a small number of other development sites, within the East Langton Neighbourhood Plan. We consider that the site is capable of delivering a scheme for 5 dwellings, in a manner that respects the residential amenity of neighbouring uses and is complimentary to the design principles of the existing built environment of the village.</p>	<p>removing the Limits to Development. The environmental policies help to direct development to the most suitable locations and will ensure that development in areas of high environmental significance take these aspects into account.</p> <p>We are aware that the proposed designation does not reflect the wishes of the landowner, however it does reflect the very strong support through the local community.</p> <p>The respondent refers to the allocation of the diocese site 'along with a small number of other development sites' however these are not identified. The NP cannot force landowners to make land available for residential development, but it does give a steer to where development would be more acceptable and where it would not be welcome.</p> <p>A minimum of 30 houses are required in the Parish up to 2031 and the PC took the decision to remove the proposed LtD in order to help it achieve this number within the Plan period. Already a site for over half this requirement has come forward on a site not otherwise protected from development within the NP and it is therefore suggested that there will be opportunities to meet the minimum requirement over the next 14 years or so.</p>
--	---	--

		<p>5.4. As The Langton s continue to grow and expand, we believe that development will be needed to provide for the various groups that will be looking to live within the area. We have significant concerns that the submitted Neighbourhood Plan does not provide a robust, flexible strategy in order to meet this future residential demand.</p> <p>5.5. Andrew Granger & Co. would like to remain involved throughout the East Langton Neighbourhood Plan process, and therefore we request to be informed of any further consultation opportunities.</p>	
<p>Resident Agent The Brudenell Estate The Estate Office Deene Park Corby Northants NN17 3EW</p> <p>Agent Landmark Planning 10 Salisbury Road Leicester LE1 7QR lw@landmarkplanning.co.uk</p>		<p>Representations on behalf of Brudenell Estates, land at Church Causeway, Church Langton:</p> <p>The Estate has a holding of approximately 2,800 hectares (7,000 acres) within Harborough District and this comprises of approximately 22 individual farm holdings (or small and medium sized enterprises (SME's)). One of these holdings is situated to the north of Church Causeway in Church Langton and comprises approximately 57 hectares (140 acres) - please see the attached plan. The land at Church Causeway that the Estate own represents a significant portion of the Neighbourhood Plan (NP) area. The Estate wish to promote a small portion of the Church Langton holding, approximately 1.5 hectares of land, in conjunction with local builders, Langton Homes, in order that a high quality development of 16 dwellings can be built. Langton Homes provide bespoke developments of small numbers of new dwellings. They recently completed an excellent development at the former Bulls Head public house in nearby Tur Langton. •</p> <p>Notwithstanding the consultations carried out by the Qualifying Body (QB), it would appear that a number of landowners in the Neighbourhood Plan Area have not been contacted during the time of the Neighbourhood Plan preparation. This has given rise to the need for a secondary consultation with landowners. The land at</p>	

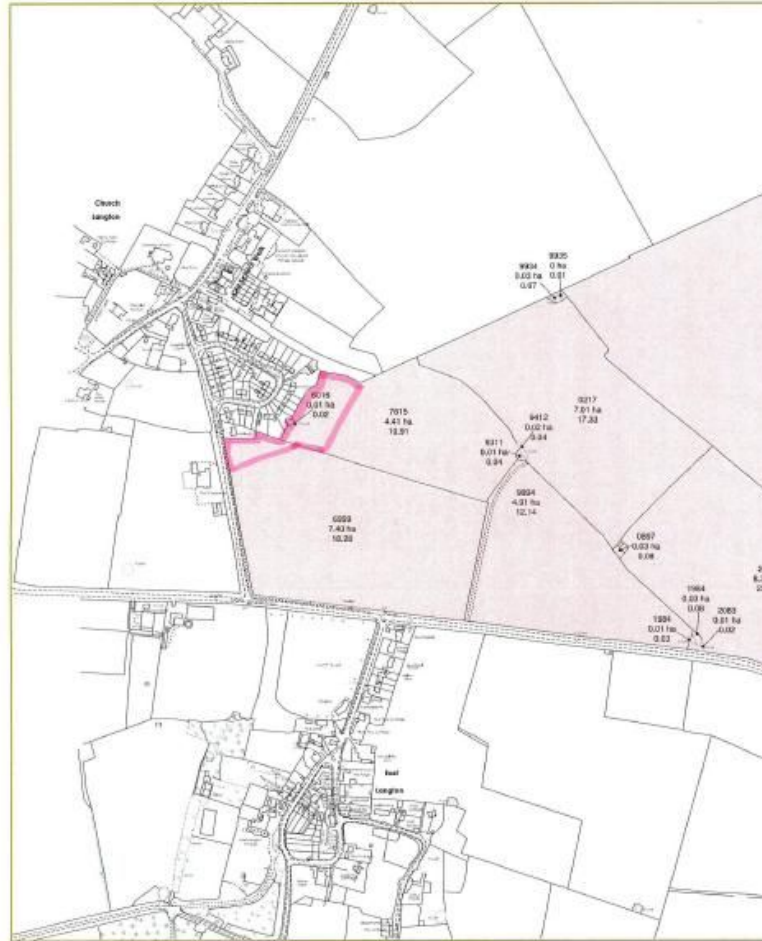
	<p>Policy S1</p>	<p>Church Causeway is not designated as "Environmentally Sensitive' in the NP. However, Harborough District Council has confirmed that this does preclude the consideration of representations from landowners whose land is not so designated. Given that it is the wish of the examiner that all land owners are given the opportunity to make representations, this view is supported.</p> <p>Policy S1 seeks simply to reassert the presumption in favour of sustainable development set out in the National Planning Policy Framework (the Framework) and in my view, as it adds little to the NP, it should be deleted.</p> <p>The introduction to this policy sets out the various stages and options for housing distribution in small settlements including Church Langton and East Langton in the emerging Local Plan. It is clear from this commentary that (i) the 'target' figures for the respective settlements are not yet set; (ii) that the approach set out in the NP of simply doubling the housing requirement for the Parish is imprecise and not backed up by any evidence. Furthermore, policy H1 itself is also imprecise and uncertain. It provides no steer on housing numbers for landowners, developers or local residents as it relies on an unpublished Local Plan. In my view, policy H1 as drafted does not meet the basic condition that it has had appropriate regard to national policies and advice. Paragraph 47 of the Framework seeks to ensure that Local Plans meet 'the full, objectively assessed needs' for housing. This work is ongoing, however, an approach which relies on an as yet unpublished Local Plan to advise what 'sufficient new homes' may be once housing distribution targets have been finalised does nothing to boost the supply of housing as required by the Framework.</p> <p>Policy H1 also seeks to rely entirely on windfall and infill sites to provide for the unmet needs of the NP area. Paragraph 48 of the Framework is clear that windfall sites can make a contribution to housing supply if there is 'compelling evidence that such sites have consistently become available and will continue to provide a reliable</p>	<p>Noted. The policy has no material impact on the Neighbourhood Plan but does establish a framework for the policies that follow.</p> <p>In the absence of definitive housing numbers (which in any case are subject to amendment as housing need changes) the NP merely confirms that it accepts the need to meet the housing requirement as set by the Local Planning Authority. As such, it is an important statement of intent and in doing so meets the basic conditions by recognising the need to meet the District's housing requirement of the Parish.</p> <p>This is not accepted. Windfall sites are by definition sites that have not been allocated through a Local or Neighbourhood Plan. As indicated above, the proposed Submission Local plan identifies the housing requirement of Selected Rural Villages as</p>
--	------------------	--	--

	<p>Policy H1</p>	<p>source of supply'. The text in subsection b) details the contribution that such windfall sites have made in the past but it acknowledges that such 'sites can not be identified in the advance' and that there is a concern that such developments 'can have an adverse impact on the environment'. In my view, these relevant concerns undermine the reliance of policy H1 on them and demonstrate that an alternative approach of allocating a site/sites for residential development would be more in keeping with national policy.</p>	<p>'Development should be primarily in the form of small-scale infill developments or limited extensions to help address economic, social or community objectives.'</p> <p>It is not necessary for Neighbourhood Plans to allocate sites in order to meet the Basic Conditions. The Brudenell site did not come forward during the SHLAA process undertaken by HDC and was not therefore taken into account in the NP.</p>
	<p>Policy H2</p>	<p>Policy H2 sets out the criteria for support being given to the development of windfall sites. The policy refers to them being 'small scale' and 'infill' and being within the existing built up area of the settlements, although Figures 2 and 3 demonstrating these limits appear to be missing from the submission version which is available on the District Council's website. Assuming that the limits reflect those shown in the Harborough Local Plan, my view is that development restricted to those limits would be insufficient to meet the emerging housing needs for the NP area. This gives further strength to the view that residential allocations would be required to fully meet objectively assessed needs as required by paragraph 47 of the Framework. Policy CS2 of the Core Strategy advises that Limits to Development around settlements will be used to shape their development and, inter alia, that housing development will not be permitted outside of Limits unless there is less than a five year supply of deliverable housing sites and the proposal is in keeping with the scale and character of the settlement concerned. The Council acknowledges that it can not presently demonstrate the requisite five year supply. The Council's latest Annual Monitoring work indicates that current position is that approximately 4.86 years supply is available. Accordingly, the first part of the second bullet point of criterion a) of policy CS2 is engaged and the principle of developing sites outside of limits is accepted. Policy CS2 is a strategic policy. The approach taken by policy H2 is not in general conformity</p>	<p>As indicated above, the reference to Limits to development appeared in the submission version of the NP in error and a request was made during Regulation 16 to remove this.</p>

		<p>with the strategic policies for the local area.</p> <p>Criterion b) of policy H1 is supported, however, criterion c) would significantly restrict the expansion of either Church or East Langton to facilitate further growth.</p> <p>Criterion k) essentially seeks to place a ceiling on new dwellings without regard to the merits of the proposal. The operation of such a policy would be contrary to the aim of boosting the supply of housing if it preventing otherwise acceptable sites from coming forward.</p>	<p>We think the respondent means policy H2 not H1. It is considered important to respect the built-up areas of the Parish and that this is a reasonable policy for an NP.</p> <p>This is not accepted. The policy seeks to ensure that development in excess of the minimum requirement identified by HDC is justified. If this is imposing a ceiling on new dwellings then so is the LPA in setting minimum housing targets for each Parish within a settlement hierarchy.</p>
	Policy H3	<p>Policy H3 on Housing Mix is essentially supported, however, it's operation for minor developments (less than 10 dwellings) would be difficult given the need to justify all proposals in relation to housing mix.</p>	<p>This is intended to apply for all development irrespective of size in order to meet a local housing need.</p>
	Policy H5	<p>Policy H5 on Affordable Housing is predicated on an assumption that small scale, infill development will meet the needs of the NP Area and that no developments exceeding the threshold of 10 dwellings (or 1000 square metres) will be permitted. My representations above indicate that I believe this assumption to be incorrect and accordingly, in my view, the policy should be revised to take account of the need to ensure that 40% of the yield of schemes of 10 dwellings or 1000 square metres is secured as affordable housing in any future residential allocations. My client's site at Church Causeway proposes 16 dwellings and accordingly up to 6 dwellings would be provided as affordable accommodation for rent or shared ownership. Such an approach would be consistent with the Framework and with policy CS3 of the adopted Core Strategy. Policy H5 should be renumbered policy H4.</p>	<p>Renumbering of the policy noted.</p> <p>The policy proposed would add nothing to existing district-wide planning policies on affordable housing and appears to repeat existing strategic policies.</p>
	Policy DBE3	<p>Policy DBE3 advises that all development should continue to reflect the character and historic context of the Parish by requiring</p>	<p>Noted.</p>

	<p>Policy ENV6</p>	<p>compliance with a number of criteria. My clients accept the importance of good design in new development. The development of the land at Church Causeway in conjunction with Langton Homes would enable a high quality, bespoke development using excellent design, detailing and materials to be carried out on an appropriate site outside of the most sensitive part of the village (the designated Conservation Area).</p> <p>This policy proposes an Area of Separation between Church Langton and East Langton. The adoption of policy ENV6 would indicate that development of my clients land at Church Causeway would not be supported because it would reduce the separation between the two settlements. This is despite the illustration in Figure 12 that indicates that the land in question is not significant either environmentally or to the community. The wording of policy ENV6 appears to be linking two separate objectives within one policy. The prevention of coalescence of the two settlements with the protection of the area shown in Figure 11 appears separate and unrelated to the information depicted in Figure 12. The development of the land at Church Causeway would not give rise to an unacceptable or significant reduction in the separation between Church Langton and East Langton or to any other demonstrable harm. Paragraph 76 of the Framework sets out clear guidance for the designation of Local Green Spaces including that their designation should be consistent with the achievement of sustainable development. The adoption of restrictive Area of Separation policy is inconsistent with this guidance as it is not demonstrably special to the local community and it proposes the protection of an extensive tract of land (paragraph 77 of the Framework refers). In my view, policy ENV6 should be deleted from the Plan.</p> <p>Further comment by email for clarification: The development of the land at Church Causeway by Langton Homes would involve only the access to the site passing through the proposed Area of Separation</p>	<p>The development of an access road through the proposed area of separation would not be seen as representing development that would reduce the separation between the two villages.</p>
--	---------------------------	--	---

Site Plan below:



Landowner

Dear Sirs

As a Trustee of Map Ref 8 {Sites of Environmental and Community Significance} I object to it being included.

The policy does not seek to prevent development but merely to ensure that any approved development takes environmental features into account.

		<p>It cannot be of any Community Significance as it cannot be seen nor is there any rights of way over it.</p> <p>It is an ordinary paddock with some ridge and furrow which probably has been ploughed at some point. There are a few small trees but really is not of parkland appearance. The marks given are far too high and clearly the land has not been inspected [certainly not with any type of permission].</p> <p>If you want any further help please let me know</p>	
Landowner	Page 3 of 7 No 8	This is not parkland just because we planted two trees. It is only of visual value to my house	Noted.
Landowner	Policy T2 – Footpaths, Footways and Bridleways`	<p>Comments relate to Attic Room and HGVs – NOT FOOTPATHS</p> <p>One was about repairs It states 5 comments but really there were only 4 – so vey misleading as only 1 was relevant.</p> <ul style="list-style-type: none"> ■ Attachments include letter from my agent dated 14th September 2016 ■ My comments form dated 15th September 2016 ■ Objection dated March 2017 ■ Detailed comments are in the above documents ■ Please respond to me, not my agent, due to the costs incurred so far being nearly £1200, with a further quote for £850 +VAT should I need to instruct them again. ■ I also left comments in the representation form last September asking why some plots were included and others not, which is also a question that needs to be answered. <p><u>Letter from Agent Sept 2016</u></p> <p>East Langton Parish Neighbourhood Plan Pre-Submission Version: Representations submitted on behalf of the owner of 'Valley Field' and land south of Chic House, Back Lane, East Langton.</p>	Valley field was removed from proposed designation as a LGS as a consequence of the representation from the landowner. Site 23 is

	<p>We act on behalf of the owner of land identified in the pre-submission version of East Langton Parish Neighbourhood Plan Figure 6 Site 22 and Figure 7 Site 23.</p> <p>Our client welcomes the opportunity to submit representations in response to the pre-submission version of the Neighbourhood Plan (NP) consultation. In summary, our client strongly objects to the proposal to designate land identified as Site 22 on Figure 6 as Local Green Space under Policy ENV 1 and Site 23 on Figure 7 as an environmentally significant site under Policy ENV 2.</p> <p>We raise objection to the NP proposed Policy ENV 1 'Protection of Local Green Spaces' and Policy ENV 2 'Other Environmentally Significant Sites' in so far as they relate to our client's land interests, on the grounds that the proposal is not 'sound' because allocation of this site does not meet the requirements or spirit of National Planning Policy, consultation has not complied with national guidance, and the policy it is not based on robust evidence. Our client's reasons for objection, including reference to national planning policies (with our emphasis), are set out below:</p> <p>National Planning Policy Framework</p> <p>1. Paragraph 73 of the National Planning Policy Framework (NPPF) expects planning polices to ensure access to high quality open spaces and opportunities for sport and recreation which can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision.</p> <p>2. Paragraph 76 of the NPPF allows local communities through local and neighbourhood plans to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new</p>	<p>classed as an 'environmentally significant site' however this merely requires development activity to have regard for the environmental features.</p>
--	--	--

		<p>development other than in very special circumstances.</p> <p>3. Paragraph 77 stipulates that Local Green Spaces designation will not be appropriate for most green areas or open space. The designation should only be used:</p> <ul style="list-style-type: none"> • where the green space is in reasonably close proximity to the community it serves; • where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • where the green area concerned is local in character and is not an extensive tract of land. <p>Planning Practice Guidance</p> <p>4. Planning Practice Guidance (PPG) Paragraph: 048 Reference ID: 41-048- 20140306 ‘Should other public bodies, landowners and the development industry be involved in preparing a draft neighbourhood plan or Order?’ requires that ‘A qualifying body must consult any of the consultation bodies whose interest it considers may be affected by the draft neighbourhood plan... set out in Schedule 1 to the Neighbourhood Planning (General) Regulations 2012 (as amended). Other public bodies, landowners and the development industry should be involved in preparing a draft neighbourhood plan or Order. By doing this qualifying bodies will be better placed to produce plans that provide for sustainable development which benefits the local community whilst avoiding placing unrealistic pressures on the cost and deliverability of that development.’ (Revision date: 06 03 2014).</p> <p>5. Paragraph: 019 Reference ID: 37-019-20140306, ‘Does land need to be in public ownership?’ requires ‘...the qualifying body... to contact landowners at an early stage about proposals to designate any part of their land as Local Green Space. Landowners will have opportunities to make representations in respect of proposals in a</p>	
--	--	---	--

	<p>draft plan.’ (Revision date: 06 03 2014)</p> <p>6. Paragraph: 007 Reference ID: 37-007-20140306, ‘How does Local Green Space designation relate to development?’ states that ‘designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. Local Green Space designation should not be used in a way that undermines the aim of plan making.’ (Revision date: 06 03 2014)</p> <p>East Langton Parish Neighbourhood Plan Pre-Submission Version</p> <p>7. The Parish Council Neighbourhood Plan steering group, has failed to meet the requirements and spirit of national planning policy and guidance, as follows:</p> <ul style="list-style-type: none"> • The landowner of site 22 on Figure 6 ‘Village Field’ and site 23 on Figure 7 was not notified by the Parish Council at an early stage in the NP preparation process about the proposal to designate the land as Local Green Space, in breach of PPG Paragraph: 019 Reference ID: 37-019-20140306; • There is insufficient evidence to justify the proposal to designate our client’s land as Local Green Space or other environmentally significant site; and • The designation of our client’s land, ‘Village Field’, as Local Green Space fails meet the requirements stipulated in national policy, paragraph 77. <p>8. The NP recognises on page 5 that:</p> <p>‘...Robust evidence is the foundation on which a Neighbourhood Plan has to be based. This includes evidence of community engagement and consultation and how the views, aspirations, wants and needs of local people have been taken into account alongside stakeholder comments and statistical information to justify the</p>	
--	---	--

		<p>policies...'</p> <p>However, our Client believes that these objectives have not been satisfied in the NP preparation process. Our client, a member of the community and landowner who will be directly and adversely affected by the proposed Local Green Space policy and designation of land as an environmentally significant site, was not notified at an early stage in the NP preparation process about the emerging policy. Also, the evidence on which the policy was based is flawed and not robust.</p> <p>9. The supporting text which seeks to justify the proposed site allocations in Policies ENV 1 and ENV 2, refers to the evidence within an 'environmental inventory' in Appendix 2 compiled from existing national and local designations, records and mapping; fieldwork; and the results of consultation with residents. The Environmental Inventory prepared by consultant yourlocale in Appendix 2 does not include a methodology or an explanation of why each site has been attributed the particular score for each Local Green Space criteria. There is no detailed information available on the characteristics or environmental value of each site.</p> <p>10. Scrutiny of the results of the public consultations with residents, which apparently fed into the 'Environmental Inventory' shows very limited support for allocation of site 23 on figure 7 and for the protection of 'Valley Field' when compared to other sites. This limited support is examined in more detail below:</p> <p>Community Consultation</p> <p>11. The questionnaire completed in early 2014 asked which were the important areas of land to keep protected - 9 respondents suggested 'land behind Back Lane', although no plan accompanied this statement and, given that Back Lane is a long road which runs east to west and north to south, it is unclear which area of land this referred to. This limited community support for 'land behind Back Lane' compares to the Cricket Ground, for example, which received 23 mentions by respondents.</p>	
--	--	---	--

		<p>12. The December 2014 public consultation asked the community to place up to 3 blue stickers on a map to identify an area of open space that is important for leisure and up to 3 green stickers in a place with a good or important view. The ‘Valley Field’ site was given only 4 blue stickers by the community and 1 green sticker. However, land to the east of proposed site 22, which is not proposed as a Local Green Space, was given 8 blue stickers and 2 green stickers. The field parcel bounded to the west by Main Street and south by Back Lane, was given 5 blue stickers and 4 green stickers, while the field to the south of the cricket ground received 5 blue and 1 green sticker. Therefore both received more support from the community than ‘Valley Field’ yet neither are proposed as Local Green Space.</p> <p>13. The two sites proposed as Local Green Space in East Langton under emerging Policy ENV1, in addition to our Client’s land, are land to the south of the Pub, Coronation Gardens, and the Cricket Ground. Coronation Gardens had so many blue stickers on this relatively small parcel of land in the public consultation it was not possible to count them, while the Cricket Ground had over 30 blue stickers and over 15 green stickers. The designation of these two sites as Local Green Space is clearly supported by evidence from the public consultation in stark contrast to ‘Valley Field’ site.</p> <p>14. It is important to note that a ‘view’, one of the criteria for identifying an area of open space in the public consultation, is not one of the requirements mentioned in national policy when considering whether land qualifies as Local Green Space.</p> <p>15. The June 2016 public consultation event asked for comments on proposed NP policies. In response to Policy ENV 1 ie. the proposed designation of the Cricket Ground (site 16), Coronation Gardens (site 19) and ‘Valley Field’ (site 22) in East Langton, as well as 3 proposed sites in Church Langton, of the 54 attendees, only 8 people were in agreement with the policy and sites 6 and 16 were the only sites singled out as of particular importance.</p>	
--	--	---	--

		<p>16. Comments received in respect of Policy ENV 2 ‘Other Environmentally Significant Sites’, only 6 people were in agreement with the policy. No comments on specific sites appear to have been made.</p> <p>17. It is therefore clear from the community consultation evidence that there is very little support for designation of ‘Valley Field’ as Local Green Space and Site 23.</p> <p>Environmental Inventory prepared by consultant yourlocale</p> <p>18. The East Langton NP Environmental Inventory does not include a methodology and therefore it is not possible to fully interrogate or evaluate the scores attributed to various sites. This inevitably undermines the validity of the conclusions reached.</p> <p>19. A starting point for the assessment of land for possible allocation as Local Green Space should, in our opinion, have been to seek and use the views of the local community about which sites might meet NPPF criteria for Local Green Space designation. For example, where green space is demonstrably special to the local community and holds a particular local significance because of its beauty, historic significance, recreational value, tranquillity or richness of its wildlife. Whilst there is evidence that sites 16 and 19 proposed under Policy ENV1 correspond to those supported by the local community for protection, there is no similar community support for site 22, ‘Valley Field’.</p> <p>20. ‘Valley Field’ has been, and continues to be, used for grazing horses, a use which is controlled by a legal covenant. The land is in private ownership with access limited to the public footpath which runs diagonally across the site. Views into the site from the public footpath are completely at the discretion of the landowner.</p> <p>21. The proposed designation of green space must be based on evidence to demonstrate why the green area is demonstrably special to a local community and holds particular significance. The text</p>	
--	--	---	--

		<p>adjacent to the Environmental Inventory scoring table states:</p> <p>‘Valley Field – Small grazing field in steep-sided valley of small brook; species-rich hedge boundaries. This field and four to its south have recently (early 2000’s) been a single parcel, but they were (eg. In 1886) previously a group of individual plots (the zig-zag eastern hedge boundary shows their layout), presumably associated with medieval dwellings on Back Lane. Locally significant for wildlife and landscape. Access from footpath A75, which follows the pre-1792 track between East Langton and Thorpe Langton.’</p> <p>22. The ‘locally significant’ elements highlighted in the document therefore appear to be wildlife and landscape. There is no evidence that an ecological survey has been carried out on the land or a landscape assessment undertaken to assess this land when compared to other green areas within and adjacent to the village to ascertain whether it is demonstrably special to the local community or holds particular significance in this regard. The conclusions are therefore based on unsubstantiated evidence.</p> <p>23. The scoring system applied in the Environmental Inventory appears to be flawed since ‘Valley Field’ has been given the same score as the Cricket Ground for access, proximity, bounded, recreation/educational value, beauty, and tranquillity. The only two categories where the score differs is for history where ‘Valley Fields’ is scored higher and wildlife where the Cricket Ground is attributed a higher score. Our client is of the firm opinion that these scores are misleading and inaccurate. For example, the Cricket Ground should clearly score significantly more for recreation and education value than ‘Valley Field’, given that ‘Valley Field’ has very limited public access which is restricted to the narrow public footpath.</p> <p>24. ‘Valley Field’ does not meet the requirements stipulated in national policy, paragraph 77, for designation of a Local Green Space. It is not appropriate to designate this site which is not demonstrably special to the local community and does not hold</p>	
--	--	--	--

	<p>particular significance for the community.</p> <p>Policy Requirements</p> <p>25. Paragraph 77 stipulates that Local Green Spaces designation will not be appropriate for most green areas or open space. 'Valley Field' is private land with no public access into the majority of the field parcel. Public access is restricted to the narrow footpath which runs across the field. The local community have not identified 'Valley Field' as being demonstrably special to the community, indeed land to the east of this field and two other sites, which have not been proposed as Local Green Space, appear to have greater support for protection than our client's land. It has been shown above that the evidence produced to justify the proposed Local Green Space designation of 'Valley Field' is not robust and cannot be relied upon to satisfy the criteria set out in national planning policy.</p> <p>26. Whilst the NPPF supports sustainable development and the protection of the environment, any proposals to designate land for specific protection, as in proposed policy ENV 2, should be robustly justified with evidence. East Langton Parish NP has not produced the necessary information to support allocation of our client's land to demonstrate that it is ecologically important, has historical features and/or is locally valued. Indeed, no access for ecological or historical survey work has been provided into the site by the landowner as she was not made aware of the proposed allocation – contrary to national planning guidance – and therefore no site assessment could have been conducted.</p> <p>27. Our client's land is already afforded additional protection from inappropriate development or felling of any trees without prior permission because it lies within the Conservation Area boundary for East Langton. The sites lies outside the proposed Limits to Development settlement boundary where development would normally be resisted. Designation of 'Valley Field' as a Local Green Space and site 23 as environmentally significant is not necessary or appropriate to control development. The proposed designations do</p>	
--	--	--


	<p>P58, Fig 12</p> <p>Appendix 2, page 3, No15</p>	<p>not appear to have significant community support and they are not robustly justified with evidence.</p> <p>Summary 28. Our Client strongly objects to the proposed designation of ‘Valley Field’, East Langton (site 22) as a Local Green Space under the terms of Policy ENV 1 ‘Protection of Local Green Spaces’ and Site 23 on Figure 7 as environmentally significant under the terms of Policy ENV 2 ‘Other Environmentally Significant Sites’. The proposal does not meet the objectives or requirements of the NPPF, it is not based on robust and credible evidence, it is not demonstrably special to the local community, and does not hold particular significance for the community.</p> <p>29. Our Client also objects to the fact that she was not notified by the Parish Council at an early stage in the NP preparation process about the proposal to designate land in her ownership as Local Green Space, in breach of the requirements set out in PPG Paragraph: 019 Reference ID: 37-019-20140306.</p> <p>30. In the light of the above objection, we should be grateful if you would amend Policy ENV1 and Figure 6 to remove reference to site 22, ‘Valley Field’ and amend Figure 7 to remove site 23 from the plan.</p> <p>Comment Form 15th September 2016</p> <p>There is a large plot of land to the South of plot 15 that is not covered by the environmental proposals, that could be accessed from opposite the West side of The Maltings – is there a reason for this?</p> <p>[not used] is the comment, and no score given, why is this? Surely all plots should be scored.</p>	<p>Not every field in the Parish was surveyed – only those in close proximity to the built-up area.</p> <p>As above.</p>
--	--	---	--

	<p>Policy T2 Footpaths, Footways and Bridleways</p>	<p>- In the Consultations Analysis 14/16 June 2016 in the section Policy T1 & T2, (pages 22 & 23) some of the comments are in the wrong place, two of the comments in the footpath section (that I made) should be in the T1 section as they relate to traffic and the Attic Room, not footpaths.</p> <p><u>Objection dated March 2017</u></p> <p>To all Members of the Parish Council involved with the East Langton Neighbourhood Plan I am the owner of land identified in the 30th November 2016 version of East Langton Parish Neighbourhood Plan, page 47 Figure 7, Site 22 & Site 23, and I strongly object to the proposals to designate land identified as an environmentally significant site under Policy ENV 2. I object to the NP proposed Policy ENV 2 'Other Environmentally Significant Sites' in relation to my land, on the grounds that the proposal is not 'sound' because allocation of this site does not meet the requirements or spirit of National Planning Policy, consultation has not complied with national guidance, and the policy it is not based on robust evidence. In addition I would refer you to points 16 & 17 of my previous objection, which mentions the fact, that only 6 people made comment, and none of the comments were specific to that land. You received a detailed objection from my agents, Tyler Parkes last September. Copy attached. To date my agent, and myself have had no response from the Parish Council or Harborough District Council with regards to my personal comments or to the formal objection. The Neighbourhood Plan has been revised and our representations do not appear to be included in the summary, which is an error. You are also obliged to contact us with a response (Regulation 14 and 16.)</p>	<p>Noted. All comments were taken into account. Thank you for taking the trouble to participate in the process.</p> <p>The purpose of policy Env 2 is not to prevent development but to ensure that any development proposals take environmental features of the site into account. Therefore, it seeks to highlight those areas of significance. It should not be seen as a blanket ban on development should it be pursued but an opportunity to protect important aspects of the land.</p>
--	--	---	---

		<p>You also received an email from me personally with my 'comments form' on 15th September 2016, In that email I highlighted some irregularities in the use of the comments; specifically comments I made about traffic to the Attic Room - yet they were included the 'footpath' section. This type of mistake is very misleading and inaccurate, and certainly cannot be described as robust evidence. In your latest version of the Neighbourhood plan you state on page 5;</p> <p>"Robust evidence is the foundation on which a Neighbourhood Plan has to be based. This includes evidence of community engagement and consultation and how the views, aspirations, wants and needs of local people have been taken into account alongside stakeholder comment and statistical information to justify the policies contained within the Plan. A detailed Statement of Consultation and a comprehensive Evidence Pack have been produced to support this Neighbourhood Plan."</p> <p>In your Appendix 2 - Environmental Inventory it states that;</p> <p>Site 23 - You state "Paddock with mature hedgerows with trees to E and S boundaries. Part of the group of which site 22 is the best- preserved." - So no environmental significance.</p> <p>Site 22 - You state "This field and four to its south have recently (early 2000s) been a single parcel, but they were (e.g. in 1886) previously a group of individual plots (the zig-zag eastern hedge boundary shows their layout), presumably associated with medieval dwellings on Back Lane.</p> <p>Locally significant for wildlife and landscape. Access from footpath A75, which follows the pre-1792 track between East Langton and Thorpe Langton."</p> <p>Much of this statement is factually incorrect - there are not four fields to the South. The land does not have a 'Brook' the only wildlife are rabbits, which are a pest. The land is called "Jacksons" not "Valley field"</p>	
--	--	---	--

		<p>From my point of view as a member of the community and stake holder these statements are simply not accurate or true. and many of the comments are based on speculation.</p> <p>I am not sure why the Parish Council has not responded to any of our multiple comments and objections, it is not acceptable that I should be disadvantaged because my representations have not been included and I have not been notified of the revised NP.</p>	
<p>Berrys On behalf of landowner</p>		<p>On behalf of our client Mr Langton Kendall we support the identification of Church Langton as a Selected Rural Village. The village has a number of services and facilities as set out in the Church Langton Settlement Profile (May 2015) where it is advised that as a rural settlement it would potentially benefit from the support of limited development such as rural housing. A Neighbourhood Plan for the whole of Langton Parish is in preparation.</p> <p>The village facilities include a Primary school, pubs, a Village Hall, church and Mobile Library. The village is also served by a reasonable bus service and has high speed broadband. Additional housing development of a small scale will help to sustain the vitality and viability of the settlement and support the continuation of its services.</p> <p>The Issues and Options document sets out a number of housing distribution options for the District. Option 1 provides a rural focus housing distribution and indicates a potential housing quantum for Church Langton at 26 dwellings. At the opposite end of the scale Option 3 provides for an urban focus and indicates an increase in dwelling numbers by 6 homes over the plan period at Church Langton. Alternative options (Options 2 and 4 through to 9) range from a possible allocation of 13 units to 32 units at Church Langton.</p> <p>At paragraph 227 the Issues and Options document identifies a capacity at Church Langton for 12 homes. This capacity is identified</p>	<p>Noted</p> <p>Noted.</p> <p>These figures have been superseded by the proposed Submission version of the Local plan (July 2017).</p> <p>Noted</p>

		<p>through the 2015 SHLAA update and essentially comprises a single site at land at Hanbury Centre, Stanton Road (SHLAA reference A/CL/HSG/01). This site is however currently categorised as important open land under Policy HS/9.</p> <p>The Church Langton Settlement Profile background/evidence base document to the Issues and Options consultation recognises that potential development sites at Church Langton may come forward through the neighbourhood planning process which is ongoing.</p> <p>Our client has a site on the northern edge of the village which is currently outside the village boundary. The site is part of a larger field but boundary planting could be established to define the site and separate the site from the open countryside beyond and drawing it into the village. Development on the opposite side of the site fronting Stanton Road has recently been approved and built and has already effectively extended the built form of the village in a northerly direction along Stanton Road. The site is outside the Conservation Area and in flood zone 1 which is at the lowest risk of flooding. The site is also well located in relation to the school which is within easy walking distance. Access to the site would be from Stanton Road where visibility along this section of road is good in both directions. As a traditional linear settlement extending along the main thoroughfares the development of the site would follow this settlement pattern. The site can provide for a development sympathetic to the existing form of the village, without any adverse impact on local heritage assets and retaining the individual settlement identity.</p> <p>Whichever of the final options for growth are taken forward on behalf of our client we would comment that Church Langton village has capacity to accommodate further development over the plan period and our client's site at Stanton Road is well placed to provide for incremental growth of the village in a sensitive manner and the indicative extent of the site is shown in pink on the plan below.</p>	<p>Noted.</p> <p>Noted.</p> <p>Noted.</p>
--	--	--	---

		<p>Church Langton Village</p> 	
<p>landowner</p>		<p>Re: East Langton Neighbourhood Plan - Consultation</p> <p>To be read in conjunction with representations made on our behalf by Berrys of Kettering and Fisher German of Market Harborough.</p> <p>I and my family are the owners of the land on the western side of Stonton Road starting at the Village Hall. It has been in the family's</p>	<p>Representation in support of development adjacent to the Community Hall is noted.</p>

		<p>ownership for very many generations. The previous owner Phillip George Kendall (dec'd) of Thorpe Langton was my cousin - our fathers being brothers who were the sons of George Edward Kendall of Thorpe Langton Manor - commemorated in a large stained-glass window in St. Leonard's Church Thorpe Langton. This is to show our historic connection, as historically good stewards of the land, not some developer who will come and be gone in a flash.</p> <p>This is the opposite side to where two new houses have recently been built taking the development up to the entrance drive to Glebe Farm (owner Stanhope).</p> <p>Our previous Agents, Berrys of Kettering, made representations from their specialist Planning Department (a copy of which I enclose) in order to register the residential area up to the same limit as that noted above.</p> <p>We are the owners of land, or have access to over 200 acres in the Langton's area.</p> <p>We do not have a farmhouse or buildings, so in due course when the next generation of our family wishes to farm the land in hand they will be able to build one. The ideal spot is obviously on the land, and adjoining the village hall, within the above development area - services being on hand.</p> <p>The plan you have sent us - figure 7 - field number 5, all of which is coloured yellow, is under our ownership. This is clearly not acceptable to us and we wish to query this or take such steps as will allow, under this review, so that the owners are able to build this house and say a cottage on Stonton Road at some time in the immediate future.</p> <p>Our intention is to plant a habitat spinney (opposite to the entrance to Glebe Farm) of hard and softwoods, with bushes to attract wild life, and as a habitat for the various species occupying the area - of about 1/3 acre.</p> <p>It will be carried out as suggested by East Midlands FWAG (East</p>	
--	--	--	--

		<p>Midlands - The Farming and Wildlife Advisory Group) of which we are members.</p> <p>This very small spinney will be fenced off from sheep and cattle and will constitute a focal point for the limit of development in the area. It will be planted with any reasonable suggestions, the Council might have, being incorporated.</p> <p>This will also present an attractive entry vista for those coming to Church Langton up the hill from Stonton Road, rather than the blank brick wall of the village hall.</p> <p>We therefore request that the neighbourhood plan make this provision on the deposited plan, which we have shown for illustrative purposes on the attached plan. GLK ONE</p> <p>If you think a meeting would be helpful, we shall be happy to make a date with you.</p> <p><u>Complaint observations</u></p> <p>1 The various plans enclosed with your report, either deliberately or mistakenly, omit the two new houses on the other side-'of Stonton Road - which is the basis for the case for building on Kendall land.</p> <p>2 The period for representations to be made, covers the national holiday period so that many people, or their advisors, are likely to miss the chance of knowing or making observations.</p> <p>3 To expect individuals to download 63 pages on their own resources is also unfair. A booklet should be prepared by the council.</p>	<p>The two new houses have been constructed very recently and before maps have been updated. There was no intention to ignore their presence.</p> <p>The consultation was organised by HDC.</p> <p>For Regulation 14 and Regulation 16, hard copies of the NP were available within the Parish and on request.</p>
--	--	--	--

Figure 7. Other environmentally significant sites. Numbers are in Environment



landowner

We still can't understand why we were not formally notified by the Parish Council at the early stages of the preparation process about the neighbourhood plan and what was planned for the land in our ownership. We were also disappointed that we didn't receive any correspondence from the original objection letters prepared by our Agent Tyler Parkes (14/09/15) and our objection letter (15/03/17). It's all been very unprofessional and we still find it very difficult that some of the land owners plots have been excluded from the Neighbourhood Plan and others not. (All seems very inconsistent and poorly handled.)

The PC made all local residents aware of the emerging NP through leaflets, newsletters, a questionnaire, open events and community magazine articles.

All responses to objection letters submitted at Regulation 14 stage were responded to formally through the statutory process.

	<p>Policy ENV2</p>	<p>We do object to the proposed Neighbourhood Plan ENV 2, other Environmentally Significant sites which includes our land on the basis that the proposal is not in accordance with the NP national guidance and part of the plan is factually incorrect, inaccurate, misleading and much is based on speculation with little concrete evidence.</p> <p>Unfortunately I have had to photograph some of the documents because our scanner isn't working properly. The last document highlights the area (appendix 2) which indicates our plot of land on site 21 on Figure 7. I just thought we would highlight this on the map so there is not any further confusion.</p> <p>Neighbourhood Plan not compiled within the national guidance. We were not notified by the Parish Council at the early stages of the preparation process about the designated land in our ownership.</p> <p>Robust evidence is the foundation of the neighbourhood Plan. Parts of the NP are factually incorrect inaccurate misleading and much is based on speculation.</p> <p>Many landowners have been excluded, need clarification why some plots have been included and others are not</p> <p>Please make all correspondence to us, not Tyler Parks the agent. We would need to instruct them direct.</p> <p>East Langton Parish Neighbourhood Plan Pre-Submission Version: Representations submitted on behalf of the owner of Home Farm, Main Street,</p> <p>We act on behalf of the owner of Home Farm, Main Street, whose land is identified in the pre-submission version of East Langton Parish Neighbourhood Figure 7 as part of Site 22 on page 47. A copy of the land registry plan is enclosed for your reference to identify the extent of our client's landholding.</p>	<p>Policy env 2 seeks to protect the significant features of the sites in question, not to prevent development altogether. This is not the same as Local Green Space designation.</p> <p>The communication arrangements were widespread through leaflets, newsletters, a questionnaire, open events and community magazine articles. Communication with landowners happened at the earliest stage possible following PC approval. In planning terms, the NP is still at an early stage during pre-submission consultation.</p> <p>It transpires that whilst many local landowners did engage in the process, there are some that we were unaware of who are trustees alongside people who actually live locally, and they had not notified those with an interest in the land.</p> <p>We are sorry that the proposed designation as part of your site as an 'other environmentally significant site' has caused such concern.</p> <p>We are unsure as to why the proposed designation is a concern to you, but please be assured that this designation does not impose a blanket ban on development nor does it confer any rights of access over your land. It merely seeks to identify</p>
--	--------------------	---	---

	<p><u>14th September 2016 representation</u></p>	<p>Our client welcomes the opportunity to submit representations in response to the pre- submission version of the Neighbourhood Plan (NP) consultation. In summary, our client strongly objects to the proposal to designate his land identified as part of Site 22 on Figure 7 as an environmentally significant site under Policy ENV 2.</p> <p>We raise objection to the NP proposed Policy ENV 2 'Other Environmentally Significant Sites' in so far as it relates to our client's land interests, on the grounds that the proposal is not 'sound' because allocation of this site does not meet the requirements or spirit of National Planning Policy, consultation has not complied with national guidance, and the policy it is not based on robust evidence.</p> <p>Our client's reasons for objection, including reference to national planning policies (with our emphasis), are set out below:</p> <p>National Planning Policy Framework</p> <ol style="list-style-type: none"> 1. Paragraph 73 of the National Planning Policy Framework (NPPF) expects planning polices to ensure access to high quality open spaces and opportunities for sport and recreation which can make an important contribution to the health and well-being of communities. Planning policies should be based on robust and up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision. 2. Paragraph 17, Core planning principles requires plans to conserve heritage assets in a manner appropriate to their significance. Paragraph 109 explains that the planning system should contribute to and enhance the natural and local environment by, amongst other objectives, protecting and enhancing valued landscapes, geological conservation interests and soils. 3. Paragraph 113 states that local planning authorities should set criteria based policies against which proposals for any 	<p>important features of the land so that they may be taken into account in any future development activity.</p> <p>Its purpose is to protect the identified features rather than to prevent development at all.</p> <p>We hope this clarification is helpful.</p>
--	--	---	--

		<p>development on or affecting protected wildlife or geodiversity sites or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.</p> <p>Planning Practice Guidance</p> <p>4. Planning Practice Guidance (PPG) Paragraph: 048 Reference ID: 41-048- 20140306 'Should other public bodies, landowners and the development industry be involved in preparing a draft neighbourhood plan or Order?' requires that 'A qualifying body must consult any of the consultation bodies whose interest it considers may be affected by the draft neighbourhood plan... set out in Schedule 1 to the Neighbourhood Planning (General) Regulations 2012 (as amended). Other public bodies, landowners and the development industry should be involved in preparing a draft neighbourhood plan or Order. By doing this qualifying bodies will be better placed to produce plans that provide for sustainable development which benefits the local community whilst avoiding placing unrealistic pressures on the cost and deliverability of that development.' (Revision date: 06 03 2014).</p> <p>5. Paragraph: 040 Reference ID: 41-040-20160211 'What evidence is needed to support a neighbourhood plan or Order?' requires evidence submitted in support of a proposed neighbourhood plan to be proportionate, robust and it should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan.</p> <p>6. Paragraph: 041 Reference ID: 41-041-20140306 'How should the policies in a neighbourhood plan be drafted?' requires policies in a neighbourhood plan to be clear and unambiguous and supported by appropriate evidence. It should be distinct to reflect and respond</p>	
--	--	--	--

	<p>to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.</p> <p>East Langton Parish Neighbourhood Plan Pre-Submission Version</p> <p>7. The Parish Council Neighbourhood Plan steering group, has failed to meet the requirements and spirit of national planning policy and guidance, as follows:</p> <ul style="list-style-type: none"> • The landowner of the western part of site 22 in Figure 7, bounded to the west by Main Street, to the south by Back Lane, and to the north by Home Farm, was not notified or involved by the Parish Council at an early stage in the NP preparation process about the proposal to designate the land as an Environmentally Significant Site; and • There is insufficient evidence to justify the proposal to designate our client's land as an environmentally significant site; and • The designation of our client's land as an environmentally significant site fails to comply with the spirit of national policy. <p>8. The NP recognises on page 5 that:</p> <p>'.. Robust evidence is the foundation on which a Neighbourhood Plan has to be based. This includes evidence of community engagement and consultation and how the views, aspirations, wants and needs of local people have been taken into account alongside stakeholder comments and statistical information to justify the policies...'</p> <p>However, our Client believes that these objectives and the national requirements have not been satisfied in the NP preparation process. Our client, a member of the community and landowner who will be directly and adversely affected by the proposed designation of land as an environmentally significant site, was not notified at an early</p>	<p>There is no agreed interpretation of 'early'. In planning applications during Regulation 14 stage, NPs are often referred to as being in an early stage.</p> <p>The degree of designation is not considered to be sufficiently restrictive to require a higher level of protection. It is not a LGS.</p>
--	---	---

	<p>stage in the NP preparation process about the emerging policy. Also, the evidence on which the policy was based is flawed and not robust.</p> <p>9. Policy ENV 2 'Other Environmentally Significant Sites' states that ·</p> <p>The sites listed (appendix 2) and mapped (figure 7 below and appendix 3) have been identified as being of local significance for their environmental features (natural and/or historical). They are ecologically important in their own right, their historical features are extant and have visible expression, and they are locally valued.</p> <p>Development proposals that affect any of these sites will be expected to ensure that, as far as possible, their identified features will be protected or enhanced.'</p> <p>The supporting text on page 45 suggests that 'Every effort should be made to resist development which threaten or damages them.'</p> <p>10. The supporting text which seeks to justify the proposed site allocations in Policy and ENV 2, refers to the evidence within an 'environmental inventory' in Appendix 2 compiled from existing national and local designations, records and mapping; fieldwork; and the results of consultation with residents. The Environmental Inventory prepared by consultant yourlocale in Appendix 2 does not include a methodology or an explanation of why each site has been attributed the particular score for each Local Green Space criteria. There is no detailed information available on the characteristics or environmental value of each site.</p> <p>11. Appendix 2 Site 22 is referred to as 'Valley field' which is located to the north of Chic House identified as site 22 on Figure 6, page 45 of the NP. Therefore, it is assumed that the reference number attributed to our client's site on Figure 7 is incorrect. Unfortunately there is no single plan showing every site assessed in</p>	<p>This refers to the identified features, not the site as a whole.</p>
--	---	---

		<p>the Environmental Inventory and therefore it is not possible to be sure which site assessment corresponds to our client's landholding. In the absence of information to the contrary, it is assumed that our client's land is in fact site 21 in the Environmental Inventory.</p> <p>12. Scrutiny of the results of the public consultations with residents, which apparently fed into the 'Environmental Inventory' shows very limited support for allocation of site 22 as shown on figure 7 when compared to other sites. This limited support is examined in more detail below:</p> <p>Community Consultation</p> <p>13. The questionnaire completed in early 2014 asked which were the important areas of 'open space and environment' to keep protected - 9 respondents suggested 'land behind Back Lane', although no plan accompanied this statement and, given that Back Lane is a long road which runs east to west and north to south, it is unclear which area of land this referred to. This limited community support for 'land behind Back Lane' compares to the Cricket Ground, for example, which received 23 mentions by respondents.</p> <p>14. The December 2014 public consultation asked the community to place up to 3 blue stickers on a map to identify an area of open space that is important for leisure and up to 3 green stickers in a place with a good or important view. The field owned by our client, which makes up part of the area shown on Figure 7 as site 22, was given only 5 blue stickers by the community and 4 green stickers. However, the evidence shows that other plots of land not proposed to be protected under NP policies were given larger numbers of blue and green stickers than our client's site. This shows that community support for protecting our client's land was not significant or greater than the support for protecting other local fields which were not taken forward in the NP.</p> <p>15. The June 2016 public consultation event asked for comments on proposed NP policies. In response to Policy ENV 2</p>	
--	--	---	--

		<p>'Other Environmentally Significant Sites', only 6 people were in agreement with the policy. No comments on specific sites appear to have been made.</p> <p>16. It is therefore clear from the community consultation evidence that there is very little support for designation of our client's land as an environmentally significant site.</p> <p>Environmental inventory prepared by consultant yourlocale</p> <p>17 The East Langton NP Environmental Inventory does not include a methodology and therefore it is not possible to fully interrogate or evaluate the scores attributed to various sites. It is not known what information has been used for the environmental assessment. It is also not clear why the specific plots within the Inventory have been selected and others excluded from any assessment. This inevitably undermines the validity of the conclusions reached.</p> <p>18. If, as we have assumed, our client's land is part of site 21 on the Environmental Inventory, rather than site 22 as shown on figure 7, the 'description/evidence' provided in the report states:</p> <p>Group of small plots and paddocks within a raised and partly embanked, rounded-rectangular site suspected locally of being part of a medieval or older (late Saxon?) defensive settlement site. Faint earthworks (house platforms, etc.?).</p> <p>Now sub-divided by fences and mature hedges and presumably in multiple ownership. A mosaic of orchards, rough grazing, gardens, etc. with trees and bushes.</p> <p>Local significance for wildlife, including 7 BAP bird species and 1 mammal.</p> <p>Although in the historic settlement core (Historic England MLE 9327) and partially within the proposed Limits to Development (HDC 2015) it remains largely undeveloped. '</p>	
--	--	---	--


		<p>19. Clearly the description of the site is couched in uncertainty over its historical significance with question marks and suggestions rather than factual evidence. No detail has been provided about which protected birds and which mammal are present within the site or whether they are found elsewhere in the village and on surrounding fields. Our client has not been asked for access into his land to carry out an ecological survey, so the ecological significance of the site are clearly open to challenge.</p> <p>20. Information publically available on Harborough District Council's web site for Ecology, the Phase 1 Habitat Survey, December 2008, does not include an assessment of East Langton. National information shown on 'Magic Maps' highlights sites MLE 1466 and DW1 as a deciduous woodland habitat in the National Forest Inventory 2014 and site DW2 is described as a traditional orchard habitat in the National Forest Inventory. There is no habitat classification shown for our client's site.</p> <p>21. Magic Maps shows a large swath of land stretching from Astley Grange Farm to the south east up to and including West Langton and land north of Thorpe Langton Road, as an area with protected bird species the Yellow Wagtail, 2005 to 2009 data (with any available 2010 data). Whilst our client's land falls within this area, so does virtually the whole of East Langton and the surrounding fields.</p> <p>22. A starting point for the assessment of land for possible allocation as an environmentally significant site should, in our opinion, have been to seek and use the views of the local community about which sites might meet the policy criteria of being of 'local significance for their environmental features (natural and/or historical)'. To identify those with 'ecological importance in their own right' it would have been necessary to undertake an ecological survey of sites.</p>	
--	--	---	--

	<p>23. Our client's land is in private ownership and there is no public access into the site. Views into the site from the adjacent roads are completely at the discretion of the landowner. The landowner has not been approached to seek permission to carry out an ecological assessment, so it is assumed that no on-site assessment has taken place.</p> <p>24. There is no evidence that an ecological survey has been carried out on the land or natural and/or historical assessment undertaken to assess this land when compared to other green areas within and adjacent to the village to ascertain whether it is demonstrably special to the local community or holds particular significance in this regard. The conclusions are therefore based on unsubstantiated evidence.</p> <p>25. It is not appropriate to designate this site which is not demonstrably special in terms of natural, historical or ecological merit and there is no evidence to demonstrate that the site holds particular significance for the community.</p> <p>Policy Requirements</p> <p>26. Whilst the NPPF supports sustainable development and the protection of the environment, any proposals to designate land for specific protection, as in proposed policy ENV 2, should be robustly justified with evidence. East Langton Parish NP has not produced the necessary information to support allocation of our client's land to demonstrate that it is ecologically important, has historical features and/or is locally valued. Indeed, no access for ecological or historical survey work has been provided into the site by the landowner as he was not made aware of the proposed allocation - contrary to national planning guidance - and therefore no site assessment could have been conducted.</p> <p>27. Our client's land is already afforded additional protection from inappropriate development or felling of any trees without prior permission because it lies within the Conservation Area boundary</p>	<p>Please be assured that the designation is not an intrusive or blanket protection from development but rather a recognition of important features that the NP seeks to safeguard.</p>
--	--	--

		<p>for East Langton. The site lies outside the proposed Limits to Development settlement boundary where development would normally be resisted. Designation of our client's site as environmentally significant is not necessary or appropriate to control development. The proposed designation does not appear to have significant community support and it is not robustly justified with evidence, as required by national policy.</p> <p>Summary</p> <p>28. Our Client strongly objects to the proposed designation of land south of Home Farm, East Langton (site 22 on Figure 7) as environmentally significant under the terms of Policy ENV 2 'Other Environmentally Significant Sites'. The proposal does not meet the objectives or requirements of the NPPF, it is not based on robust and credible evidence, and it has not been shown to be locally valued more than other sites which are not proposed to be allocated in the NP for specific protection.</p> <p>29. Our Client also objects to the fact that he was not notified by the Parish Council at an early stage in the NP preparation process about the proposal to designate land in his ownership as an environmentally significant site contrary to the requirements set out in PPG Paragraph 048 Reference ID: 41-048-20140306.</p> <p>30. In the light of the above objection, we should be grateful if you would amend Figure 7 to remove land in our client's ownership from the area identified as site 22 on page 47 of the NP, as shown on the attached land registry plan.</p> <p>We should be grateful if you would acknowledge receipt of this letter.</p> <p>I have made formal representations, but not been notified to the revised plan, nor has the objection had a response. My representations have not been included in the revised plan</p>	<p>Although the site was measured against the LGS criteria, it fell somewhat short of meeting the requirements for such a designation. It is for this reason that the far less intrusive proposed designation has been proposed.</p> <p>The PC undertook extensive consultation across the Parish which is indeed referred to in the respondent's submission.</p>
--	--	--	---

	<p><u>Representation Form 8th March 2017</u></p> <p><u>Letter to PC 15th March 2017</u></p>	<p>Not complied with National Guidance and it is not based on Robust Evidence, many land owners have been excluded 1 have not been sent a copy of the NP, despite asking to be included</p> <p>Robust Evidence Is the foundation of the Neighbourhood Plan - Parts of the NP are factually incorrect, inaccurate, misleading and much is based on speculation</p> <p>To all Members of the Parish Council involved with the East Langton Neighbourhood Plan</p> <p>We are the owners of part of the land identified in the 30th November 2016 version of East Langton Parish Neighbourhood Plan, page 47 Figure 7, Site 21, and I strongly object to the proposals to designate land identified as an environmentally significant site under Policy ENV 2.</p> <p>I object to the NP proposed Policy ENV 2 'Other Environmentally Significant Sites' in relation to my land, on the grounds that the proposal is not 'sound' because allocation of this site does not meet the requirements or spirit of National Planning Policy, consultation has not complied with national guidance, and the policy is not based on robust evidence.</p> <p>You received a detailed objection from my agents, Tyler Parkes last September. To date my agent, and myself have had no response from the Parish Council or Harborough District Council with regards to the formal objection. The Neighbourhood Plan has been revised and our representations do not appear to be included in the summary, which is an error. You are also obliged to contact us with a response (Regulation 14 and 16 .)</p> <p>"Group of small plots and paddocks within a raised and partly embanked, rounded-rectangular site suspected locally of being part of a medieval or older (late Saxon?) defensive settlement site. Faint</p>	<p>This correspondence is noted. The matters raised have been addressed above.</p> <p>The formal response was through the comments made through Regulation 14 and submitted to HDC as part of the Submission of the NP. HDC then wrote to all respondents with reference to the formal responses made by the PC.</p>
--	---	--	--

		<p>earthworks (house platforms etc.?).</p> <p>Now sub-divided by fences and mature hedges and presumably in multiple ownership. A mosaic of orchards_ rough and good grazing, gardens, etc. with trees and bushes</p> <p>Local significance for wildlife including 7 BAP birds species and 1 mammal.</p> <p>Although in the historic settlement core (Historic England MLE 9327) and partially within the proposed Limits to Development (HDC 2015) it remains largely undeveloped. "</p> <p>There is no real evidence of the types of birds, nor the single 'mammal', and nothing substantive to prove our part of the land is of environmentally significant</p>	
<p>Wells McFarlane 26 Bank Street Lutterworth</p> <p>On behalf of landowner</p>	<p>Policy ENV2</p>	<p>The Policy states that 'other environmentally significant sites ' have been identified as being of significance for their environmental features and are ecologically important in their own right and their historical features are extant and have visible expression.</p> <p>Field number 4 - lying due north of Church Langton is an intensively farmed arable field on a typical 3 crop rotation. It is heavily cultivated each year and has limited potential for environmental features. We do not believe it is ecologically important or has any historical features on or within it that are extant or have visible expression.</p> <p>Consequently we believe that its designation under Policy ENV2 as an environmentally significant site is incorrect and does not follow the intent or phraseology of the policy.</p> <p>We see no reason or benefit for this designation. The land is adjacent to the Conservation Area and outside the limits to development. Should a planning application ever be submitted on</p>	<p>It is not the intention of this policy to prevent routine agricultural practices. It would only apply if the land in question was subject to a planning application, at which point protection would be sought for the environmental features identified.</p>

		<p>this area, it would be judged at that time in context.</p> <p>We believe the environmental site designation could restrict agricultural operations on this land.</p>	
landowner	Map page 33 of 63	<p>Area marked is not ridge and furrow. Photograph enclosed taken from N/W to S/E</p> 	<p>Taken from above, evidence of historic ridge and furrow are evident.</p>