

Swinford Neighbourhood Plan

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/page	Full Representation
Resident 1	Section 4 Community Involvement	<p>There is much within this submission that is laudable – and I am both pleased and relieved to see that is so. It has taken much persuasion to make it so.</p> <p>However, I believe that this is despite the process followed, rather than because of it. A major omission giving rise for concern is identified at the end of these more general comments.</p> <p>Section 4 Community involvement</p> <ul style="list-style-type: none"> • Consultation was flawed. Although it started well enough, with opinions sought from residents, the handling of responses fell far short of what had been promised to residents, and what they expected. • After the initial questionnaire, it appears the procedure was aimed at reducing the involvement of residents, in both width and depth of scope. • Although there were two open public meetings, they took a form of exhibitions of what had been volunteered, shown on display boards, with team members on hand to answer questions. So far, so good. • Many of the comments/requirements volunteered by residents were merely lost in a series of “small print” lists, with little – if any- encouragement to explore the significance or viability of those points to the village. This is understandable for requirements that were perhaps plainly optimistic or unrealistic. That did not apply to all concerns. • However – although it was requested – not once was there an open public meeting at which an audience (as opposed to a constantly changing handful of exhibition visitors) could - indeed should – have been led through the requirements in a proactive manner. The 3rd “public meeting” did not fulfil this purpose, and was not set up to do so. Some requests/suggestions from residents could not be adequately described, much less evaluated, in a single phrase on a display board. • Such public discussion events would have achieved a far greater awareness and understanding than a simple exhibition. Delivered properly, for the benefit of residents, with the intention to maximise resident understanding and involvement, such an event would have given the residents the opportunity to question the proposers of requirements and suggestions. It would also provide far superior understanding of those suggestions than was available from whichever member of the NP team who may have been present at an exhibition. • Such open discussion with the proposer of a requirement/suggestion would have resulted in its

	<p>Section 6 Housing Policy</p>	<p>inclusion or exclusion based on demonstrable reasoning.</p> <p>Section 6 Housing policy</p> <p>P31 Housing Allocations Not all landowners have been approached. At least one who is more than prepared to release land has been totally omitted from the process – without either acknowledgement or justification of this omission. Major omission</p> <p>Whilst the need of homes for the ageing population is acknowledged, this stops short of policies that would protect such provision from being usurped by predatory developers whose motive is not altruistic, but commercial only. The concern here is that there may be a recognised need for (say) 15 homes for the elderly. This is very likely to create an attitude of acceptance by HDC to a planning application targeting the need. However, a “retirement complex” for 15 residents is most likely to be beyond the financial means of Swinford’s elderly. However, it would appear ‘mop up’ the allocation of the need, yet be occupied by people other than those the NP is supposed to support. This is addressed in more detail in the further attachment.</p> <p>NP & housing for the elderly</p> <p>It is wise to first identify and recognise obstacles to addressing this issue for the full benefit of the community. Briefly, these are:</p> <ol style="list-style-type: none"> 1. The proffered claim that this issue is outside the remit of the NP. 2. The proffered claim that the NP is about housing – and only housing. 3. The proffered claim that what goes onto a particular piece of land is merely a commercial decision totally at the behest of the developer. 4. Antipathy towards suggestion/offering from specific individuals – without due consideration of any merit those suggestions have. <p>To deal with these in sequence:</p> <ol style="list-style-type: none"> 1. This error contravenes the advice made in statements at a Neighbourhood Planning advisory event held by CPRE on 20/6/2015 The speakers were Mick Duggan (Department for Communities and Local Government), Matt Bills (HDC), Gary Kirk (yourLocale) and Matt Thompson (CPRE). <ol style="list-style-type: none"> a. Mark Duggan stated that “Policies embedded in “made” Neighbourhood Plans have statutory force and status – but only relating to development and use of land.” <ol style="list-style-type: none"> i. When questioned, it was confirmed that such policies can influence the type and style of development – and retain force and status. b. Gary Kirk re-inforced the points that a Neighbourhood Plan can influence: <ol style="list-style-type: none"> i. Where new building can take place
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	<p>“That no proposal for leasehold homes be acceptable unless it meets the conditions and safeguards for residents as approved/defined by the Leasehold Knowledge Partnership (LKP) or the Campaign Against Retirement Leasehold Exploitation (Carlex).”</p> <p>This is intended to apply to both individual house construction, and so-called retirement villages.</p> <p>It should be noted that several other organisations exist with names/acronyms to suggest they serve the interests of the householder/homeowner. They do not. In several cases they represent ONLY the interests of the developer and/or the almost anonymous financial venture company to whom leases are sold onwards by builders shortly after the first householder/homeowner has taken possession. When the homeowner later attempts to buy the lease, the new leaseholder then charges a hugely increased amount to the unfortunate homeowner. It is precisely for this reason that the Government has refused to include leasehold houses in its Help to Buy Scheme.</p>
<p>Leicestershire County Council</p>	<p>Swinford Neighbourhood Plan Comments Requested – 1 November 2017</p> <p>Leicestershire County Council is supportive of the Neighbourhood plan process and welcome being included in this consultation.</p> <p><u>Highways</u></p> <p><u>General Comments</u></p> <p>The County Council recognises that residents may have concerns about traffic conditions in their local area, which they feel may be exacerbated by increased traffic due to population, economic and development growth. Like very many local authorities, the County Council’s budgets are under severe pressure. It must therefore prioritise where it focuses its reducing resources and increasingly limited funds. In practice, this means that the County Highway Authority (CHA), in general, prioritises its resources on measures that deliver the greatest benefit to Leicestershire’s residents, businesses and road users in terms of road safety, network management and maintenance. Given this, it is likely that highway measures associated with any new development would need to be fully funded from third party funding, such as via Section 278 or 106 (S106) developer contributions. I should emphasise that the CHA is generally no longer in a position to accept any financial risk relating to/make good any possible shortfall in developer funding.</p> <p>To be eligible for S106 contributions proposals must fulfil various legal criteria. Measures must also directly mitigate the impact of the development e.g. they should ensure that the development does not make the existing highway conditions any worse if considered to have a severe residual impact. They cannot unfortunately be sought to address existing problems.</p> <p>Where potential S106 measures would require future maintenance, which would be paid for from the County Council’s funds, the measures would also need to be assessed against the County Council’s other priorities and as such may not be maintained by the County Council or will require maintenance funding to be provide as a commuted sum.</p> <p>With regard to public transport, securing S106 contributions for public transport services will normally focus</p>

on larger developments, where there is a more realistic prospect of services being commercially viable once the contributions have stopped i.e. they would be able to operate without being supported from public funding. The current financial climate means that the CHA has extremely limited funding available to undertake minor highway improvements. Where there may be the prospect of third party funding to deliver a scheme, the County Council will still normally expect the scheme to comply with prevailing relevant national and local policies and guidance, both in terms of its justification and its design; the Council will also expect future maintenance costs to be covered by the third party funding. Where any measures are proposed that would affect speed limits, on-street parking restrictions or other Traffic Regulation Orders (be that to address existing problems or in connection with a development proposal), their implementation would be subject to available resources, the availability of full funding and the satisfactory completion of all necessary Statutory Procedures.

Flood Risk Management

The County Council are fully aware of flooding that has occurred within Leicestershire and its impact on residential properties resulting in concerns relating to new developments. LCC in our role as the Lead Local Flood Authority (LLFA) undertake investigations into flooding, review consent applications to undertake works on ordinary watercourses and carry out enforcement where lack of maintenance or unconsented works has resulted in a flood risk. In April 2015 the LLFA also became a statutory consultee on major planning applications in relation to surface water drainage and have a duty to review planning applications to ensure that the onsite drainage systems are designed in accordance with current legislation and guidance. The LLFA also ensures that flood risk to the site is accounted for when designing a drainage solution.

The LLFA is not able to:

- Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation.
- Use existing flood risk to adjacent land to prevent development.
- Require development to resolve existing flood risk.

When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points:

- Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)).
- Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map).
- Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding.
- How potential SuDS features may be incorporated into the development to enhance the local amenity, water quality and biodiversity of the site as well as manage surface water runoff.
- Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk.

All development will be required to restrict the discharge and retain surface water on site in line with current government policies. This should be undertaken through the use of Sustainable Drainage Systems (SuDS).

	<p>Appropriate space allocation for SuDS features should be included within development sites when considering the housing density to ensure that the potential site will not limit the ability for good SuDS design to be carried out. Consideration should also be given to blue green corridors and how they could be used to improve the bio-diversity and amenity of new developments, including benefits to surrounding areas. Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing watercourses and land drainage (including watercourses that form the site boundary) are retained as open features along their original flow path, and are retained in public open space to ensure that access for maintenance can be achieved. This should also be considered when looking at housing densities within the plan to ensure that these features can be retained. LCC, in its role as LLFA will not support proposals contrary to LCC policies. For further information it is suggested reference is made to the National Planning Policy Framework (March 2012), Sustainable drainage systems: Written statement - HCWS161 (December 2014) and the Planning Practice Guidance webpage.</p> <p><u>Planning</u> <u>Developer Contributions</u> If there is no specific policy on Section 106 developer contributions/planning obligations within the draft Neighbourhood Plan, it would be prudent to consider the inclusion of a developer contributions/planning obligations policy, along similar lines to those shown for example in the Draft North Kilworth NP and the draft Great Glen NP albeit adapted to the circumstances of your community. This would in general be consistent with the relevant District Council's local plan or its policy on planning obligations in order to mitigate the impacts of new development and enable appropriate local infrastructure and service provision in accordance with the relevant legislation and regulations, where applicable. www.northkilworth.com/wp-content/uploads/2016/01/nk-draft-low-resolution-1.pdf http://www.harborough.gov.uk/downloads/file/3599/great_glen_referendum_version_2pdf</p> <p><u>Mineral & Waste Planning</u> The County Council is the Minerals and Waste Planning Authority; this means the council prepares the planning policy for minerals and waste development and also makes decisions on mineral and waste development. Although neighbourhood plans cannot include policies that cover minerals and waste development, it may be the case that your neighbourhood contains an existing or planned minerals or waste site. The County Council can provide information on these operations or any future development planned for your neighbourhood.</p> <p>You should also be aware of Mineral Consultation Areas, contained within the adopted Minerals Local Plan and Mineral and Waste Safeguarding proposed in the new Leicestershire Minerals and Waste Plan. These proposed safeguarding areas and existing Mineral Consultation Areas are there to ensure that non-waste and non-minerals development takes place in a way that does not negatively affect mineral resources or waste operations. The County Council can provide guidance on this if your neighbourhood plan is allocating</p>
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	<p>development in these areas or if any proposed neighbourhood plan policies may impact on minerals and waste provision.</p> <p><u>Education</u> Whereby housing allocations or preferred housing developments form part of a Neighbourhood Plan the Local Authority will look to the availability of school places within a two mile (primary) and three mile (secondary) distance from the development. If there are not sufficient places then a claim for Section 106 funding will be requested to provide those places. It is recognised that it may not always be possible or appropriate to extend a local school to meet the needs of a development, or the size of a development would yield a new school. However, in the changing educational landscape, the Council retains a statutory duty to ensure that sufficient places are available in good schools within its area, for every child of school age whose parents wish them to have one.</p> <p><u>Property</u> Strategic Property Services No comment at this time.</p> <p><u>Adult Social Care</u> It is suggested that reference is made to recognising a significant growth in the older population and that development seeks to include bungalows etc of differing tenures to accommodate the increase. This would be in line with the draft Adult Social Care Accommodation Strategy for older people which promotes that people should plan ahead for their later life, including considering downsizing, but recognising that people's choices are often limited by the lack of suitable local options.</p> <p><u>Environment</u> With regard to the environment and in line with the Governments advice, Leicestershire County Council (LCC) would like to see Neighbourhood Plans cover all aspects of the natural environment including climate change, the landscape, biodiversity, ecosystems, green infrastructure as well as soils, brownfield sites and agricultural land.</p> <p><u>Climate Change</u> The County Council through its Environment Strategy and Carbon Reduction Strategy is committed to reducing greenhouse gas emissions in Leicestershire and increasing Leicestershire's resilience to the predicted changes in climate. Neighbourhood Plans should in as far as possible seek to contribute to and support a reduction in greenhouse gas emissions and increasing the county's resilience to climate change.</p> <p><u>Landscape</u> The County Council would like to see the inclusion of a local landscape assessment taking into account Natural England's Landscape character areas; LCC's Landscape and Woodland Strategy and the Local</p>
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District/Borough Council landscape character assessments. We would recommend that Neighbourhood Plans should also consider the street scene and public realm within their communities, further advice can be found in the latest 'Streets for All East Midlands' Advisory Document (2006) published by English Heritage.

Biodiversity

The Natural Environment and Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, in the exercise of their duties, to the purpose of conserving biodiversity. The National Planning Policy Framework (NPPF) clearly outlines the importance of sustainable development alongside the core principle that planning should contribute to conserving and enhancing the natural environment and reducing pollution. Neighbourhood Plans should therefore seek to work in partnership with other agencies to develop and deliver a strategic approach to protecting and improving the natural environment based on local evidence and priorities. Each Neighbourhood Plan should consider the impact of potential development on enhancing biodiversity and habitat connectivity such as hedgerows and greenways.

The Leicestershire and Rutland Environmental Records Centre (LRERC) can provide a summary of wildlife information for your Neighbourhood Plan area. This will include a map showing nationally important sites (e.g. Sites of Special Scientific Interest); locally designated Wildlife Sites; locations of badger setts, great crested newt breeding ponds and bat roosts; and a list of records of protected and priority Biodiversity Action Plan species. These are all a material consideration in the planning process. If there has been a recent Habitat Survey of your plan area, this will also be included. LRERC is unable to carry out habitat surveys on request from a Parish Council, although it may be possible to add it into a future survey programme.

Contact: planningecology@leics.gov.uk, or phone 0116 305 4108

Green Infrastructure

Green infrastructure (GI) is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities, (NPPF definition). As a network, GI includes parks, open spaces, playing fields, woodlands, street trees, cemeteries/churchyards allotments and private gardens as well as streams, rivers, canals and other water bodies and features such as green roofs and living walls.

The NPPF places the duty on local authorities to plan positively for a strategic network of GI which can deliver a range of planning policies including: building a strong, competitive economy; creating a sense of place and promote good design; promoting healthier communities by providing greater opportunities for recreation and mental and physical health benefits; meeting the challenges of climate change and flood risk; increasing biodiversity and conserving and enhancing the natural environment. Looking at the existing provision of GI networks within a community can influence the plan for creating & enhancing new networks and this assessment can then be used to inform CIL (Community Infrastructure Levy) schedules, enabling communities to potentially benefit from this source of funding.

Neighbourhood Plan groups have the opportunity to plan GI networks at a local scale to maximise benefits for their community and in doing so they should ensure that their Neighbourhood Plan is reflective of the relevant Local Authority Green Infrastructure strategy. Through the Neighbourhood Plan and discussions with the Local

	<p>Authority Planning teams and potential Developers communities are well placed to influence the delivery of local scale GI networks.</p> <p><u>Brownfield, Soils and Agricultural Land</u> The NPPF encourages the effective use of brownfield land for development, provided that it is not of high environmental/ecological value. Neighbourhood planning groups should check with DEFRA if their neighbourhood planning area includes brownfield sites. Where information is lacking as to the ecological value of these sites then the Neighbourhood Plan could include policies that ensure such survey work should be carried out to assess the ecological value of a brownfield site before development decisions are taken. Soils are an essential finite resource on which important ecosystem services such as food production, are dependent on. They therefore should be enhanced in value and protected from adverse effects of unacceptable levels of pollution. Within the governments “Safeguarding our Soils” strategy, DEFRA have produced a code of practice for the sustainable use of soils on construction sites which could be helpful to neighbourhood planning groups in preparing environmental policies. High quality agricultural soils should, where possible be protected from development and where a large area of agricultural land is identified for development then planning should consider using the poorer quality areas in preference to the higher quality areas. Neighbourhood planning groups should consider mapping agricultural land classification within their plan to enable informed decisions to be made in the future. Natural England can provide further information and Agricultural Land classification.</p> <p><u>Impact of Development on Civic Amenity Infrastructure</u> Neighbourhood planning groups should remain mindful of the interaction between new development applications in a district area and the Leicestershire County Council. The County’s Waste Management team considers proposed developments on a case by case basis and when it is identified that a proposed development will have a detrimental effect on the local civic amenity infrastructure then appropriate projects to increase the capacity to off-set the impact have to be initiated. Contributions to fund these projects are requested in accordance with Leicestershire’s Planning Obligations Policy and the Community Infrastructure Legislation Regulations.</p> <p><u>Communities</u> Consideration of community facilities is a positive facet of Neighbourhood Plans that reflects the importance of these facilities within communities and can proactively protect and develop facilities to meet the needs of people in local communities. Neighbourhood Plans provide an opportunity to;</p> <ol style="list-style-type: none"> 1. Carry out and report on a review of community facilities, groups and allotments and their importance within your community. 2. Set out policies that seek to; <ul style="list-style-type: none"> <input type="checkbox"/> protect and retain these existing facilities, <input type="checkbox"/> support the independent development of new facilities, and, <input type="checkbox"/> identify and protect Assets of Community Value and provide support for any existing or future
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		<p>designations.</p> <p>3. Identify and support potential community projects that could be progressed.</p> <p>Economic Development We would recommend including economic development aspirations with your Plan, outlining what the community currently values and whether they are open to new development of small businesses etc.</p> <p><u>Superfast Broadband</u> High speed broadband is critical for businesses and for access to services, many of which are now online by default. Having a superfast broadband connection is no longer merely desirable, but is an essential requirement in ordinary daily life. All new developments (including community facilities) should have access to superfast broadband (of at least 30Mbps) Developers should take active steps to incorporate superfast broadband at the pre-planning phase and should engage with telecoms providers to ensure superfast broadband is available as soon as build on the development is complete. Developers are only responsible for putting in place broadband infrastructure for developments of 30+ properties. Consideration for developers to make provision in all new houses regardless of the size of development should be considered.</p> <p><u>Equalities</u> While we cannot comment in detail on plans, you may wish to ask stakeholders to bear the Council's Equality Strategy 2016-2020 in mind when taking your Neighbourhood Plan forward through the relevant procedures, particularly for engagement and consultation work. A copy of the strategy can be view at: www.leicestershire.gov.uk/sites/default/files/field/pdf/2017/1/30/equality-strategy2016-2020.pdf</p>
Resident 2		<p>Swinford Neighbourhood Plan Comments on Submission Version I commented on the second Reg 14 draft NP on 14th August 2017. The submission version contains some changes but many of my concerns have not been resolved so I wish to submit them for consideration by the Independent Examiner. My main concerns are that there are factual inaccuracies, some policies and statements are not backed by hard evidence, there are potential conflicts between policies and much subjective comment. In some instances it is evident that the unknown author, or authors, are not familiar with conventions relating to documents in the public domain, cannot read plans and appear not to understand some basic planning principles.</p> <p>A. presentational issues.</p> <ol style="list-style-type: none"> 1. Any document that is subject to comment or scrutiny by others should have para. Nos. as well as page Nos. for easy reference. 2. All documents should have a version No. and date of publication to distinguish it from other versions. 3. There is no bibliography, or list of supporting documents included with the main document

		<p>although some are included on the PC website. The fact that these are only on the Website and not identifiable or easily available to consultees without access to the website limits the ability of some (mainly older) villagers to comment.</p> <p>4. There are numerous statements and subjective opinions in the document that are not backed up by factual evidence or research.</p> <p>5. I do not know who, or how the NP has been edited but the sequence of policies appears to be muddled. For instance, it is unclear if the housing allocations have been judged against the environmental policies in the NP or if the environmental policies have been fitted around the housing allocations.</p> <p>6. I contrast the Submission version with North Kilworth NP which is factual, logical, to the point, seems to represent the views of the village, and was produced under the same Local Planning framework, with the same Consultant, and the same Parish Clerk.</p>
	Pp. 4 2nd para.	<p>1. Background and Content.</p> <p>1. Pp. 4 2nd para. Judging from the housing allocations and locations this is not so. The villagers have not been consulted on housing site options, only having been presented with a fait accompli. On the basis of the early consultations the village wanted a minimum of development on a range of sites because of a lack of facilities.</p>
	Pp. 8	<p>2. Planning Context.</p> <p>1. Pp. 8, "NP's are required to contribute to sustainable development" I do not see how this is so when the housing allocations are in open countryside and the village is totally reliant on cars for transport as there is no public bus service and no local food shop. Any new development is entirely reliant on the car for journeys to work, shopping and access to most other services.</p>
	Pp 9, 2nd para.	<p>2. Pp 9, 2nd para. A social role with " accessible local services" This is clearly not the case, most services being in Lutterworth 3-4 miles away,.</p>
	Pp 9, 4th para.	<p>3. Pp 9, 4th para. How can the NP be moving to a low carbon economy when it is entirely reliant on the car for transport?</p>
	Pp9, 5th para.	<p>4. Pp9, 5th para. "special open spaces are protected" The development of the Mourant paddock is in conflict with it's special significance to the Conservation Area as defined in the original C.A. Designation report. The NPAC and PC made no effort to protect this important site.</p>
	Pp 12/13.	<p>3. Swinford village.</p> <p>1. Pp 12/13. The history is interesting but does not inform or have any direct relevance to policies. The document could be much shorter and more relevant if explanation that is not directly relevant to policies is excluded. This point also relates to much of the repetitive dialogue later in the document.</p>
	Pp 13. 2nd	<p>2. The profile confirms that the village is over reliant on the car for transport and the existing housing type profile is distorted in favour of larger, more expensive and lower density properties.</p> <p>3. Pp 13. 2nd para. The high level of under-occupancy is partly due to the lack of smaller</p>

	<p>para. Pp 13. 3rd para. Pp13 5th-6th paras.</p> <p>Pp 18</p> <p>Pp 18, 1st and 3rd paras.</p> <p>Pp 18/19. Objectives section</p> <p>Pp 21 1st para.</p> <p>Pp 21, Limits of Development.</p>	<p>accommodation which mitigates against down-sizing.</p> <p>4. Pp 13. 3rd para. I think the fit between demand and supply of small housing is probably a bigger issue than affordable housing but does not appear to be addressed in the housing policies.</p> <p>5. Pp13 5th-6th paras. the statements about public transport are dis-ingenious. There is no public transport in the village and this is fundamental to the un-suitability of Swinford for so-called "sustainable development."</p> <p>6. Process</p> <p>1. The process is described but there is no summary of the responses or the views of villagers, how these responses have been assimilated into policies, or the fact that it was the villagers who discovered the housing allocation was flawed and that 71 requested that the housing allocations be revisited.</p> <p>2. Pp 18 There is a reference to the NPAC considering responses to the Reg 14 consultation. The NPAC did not as it had not met since April.</p> <p>6.Vision</p> <p>1. Pp 18, 1st and 3rd paras. Reference is made to reflecting the views of the community and addressing it's needs, but nowhere in this section or the policies are the majority views of the village actually identified or used as an evidence base.</p> <p>2. Pp 18/19. Objectives section. The sentiments expressed here are not borne out by the policies or actions to date. For instance, the NPAC failed to comment on "The Berries" application despite it being a serious encroachment into open countryside,(it scores badly in the Site Assessment) or comment adequately on the Mourant paddock application despite it being identified, with other open spaces as being important in the Conservation Area. The NPAC and PC had every justification to comment robustly on both these proposals as the PC is a Statutory Consultee on planning applications.</p> <p>8. Policies.</p> <p>1. Pp 21 1st para. Another reference to sustainable development and not making life "worse for future generations". I fail to understand why adding 35- 45 houses to a village, which has no shop or bus service to access other facilities and will inevitably add significantly to car travel on narrow inadequate country lanes, can be claimed to be sustainable.</p> <p>2. Pp 21, Limits of Development. This policy in the Core Strategy has served the village well in the past but with the approval of "The Berries" application outside the current LoD seems to have been abandoned. The section seems to have been lifted from another document as Swinford is not likely to merge with another "hamlet".</p>
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	<p>Pp 22 and Map 1 pp 24 Updated limits of Development</p> <p>Pp 24. Housing Policy.</p> <p>Building Design</p> <p>Community Views</p> <p>Policy H1</p>	<p>3. Pp 22 and Map 1 pp 24 Updated limits of Development. The boundary of the proposed limits to development has not been the subject of consultation as it has only been published in the submission version of the NP. There is no logical reason or explanation as to why it does not follow the boundaries of existing development on the south-west side of Stanford Road rather than including undeveloped land that is a potential housing site for 6-8 dwellings.</p> <p>4. Pp 24. Housing Policy. I have previously made the point that the built environment (building design) is entirely different from housing policy (the number and type of housing). The section is muddled and the policy H1 is about Building Design, which ought to apply to all building and not just housing.</p> <p>5. It would be more logical to group Building Design together with Conservation Area and Listed Building policies.</p> <p>6. Pp 26. 3rd and 6th Paras. No background evidence has been referred to in support of the statements about the communities views.</p> <p>7. Pp 27. Policy H1, Paras 1 and 2. These are vague design aspirations which are entirely subjective. Compare with North Kilworth policy NK9 which is a comprehensive design guide.</p> <p>8. Pp 27. Policy H1, It is quite evident that Swinford has a higher car ownership than catered for by the standards in para 3. A good example is Simon's Close where off-street parking is inadequate. The policy does not address this issue which can only get worse with more housing.</p> <p>9. Pp 28 Village profile, 2nd para. There is plenty of anecdotal evidence that young people move out of the village because there is no suitable or affordable housing (by which I mean cheaper open market housing).</p> <p>10. Pp29. The housing profile confirms the lack of smaller homes and the MRH concludes that there is a need for smaller homes.</p> <p>11. Pp30. 2nd para. Actually about one third of residents who responded to the consultation were opposed to any development.</p> <p>9. Housing policies.</p> <p>1. Pp 31. this requires a "minimum" of 35 dwellings but Policy H3 requires "around" a certain number on each site. Furthermore the use of the term "minimum" implies that there is no limit to the number of new dwellings. This requires clarification.</p> <p>2. Pp 32. This diagram and text confuses the issue as the original SHLAA sites have been overtaken by the consideration of additional sites.</p> <p>3. Pp33. I am concerned that an accurate plan of housing sites has only now been produced in the submission version of the NP. This means that, to date, villagers have been unable to comment properly on what is probably the most important issue in the NP. The plan is still fundamentally flawed</p>
Pp 31.		
Pp 32.		
Pp33		

	<p>Pp 33. 1st sentence.</p> <p>Pp 34.</p> <p>Pp 34 3rd para</p>	<p>because site capacities do not seem to have been accurately calculated. For instance, Site 8 is allocated 20-22 dwellings, over 4 times the number for site 7 (4-5) but is only about 2 ½ times the size. Site 6 is allocated 18-20 dwellings but is only double the size of site7 (4-5). I do not know how the sustainable site assessment could be undertaken on this basis.</p> <p>4: Pp 33. 1st sentence. I have previously pointed out that this is incorrect and misleading. "The Berries" SHLAA site (4-5 dwellings) comprises the existing quadrangle of farm buildings and is clearly identified on Map 3 on pp32. The site for which PP. was obtained (9 dwellings) is inaccurately shown on Map 4 on pp33 as it is to the south of, and only includes a small portion of the SHLAA site. This means that the original SHLAA site is now an infill site for about 4 - 5. dwellings. This error is all the more worrying as it would appear the NPAC is incapable of reading plans.</p> <p>5. The Site Sustainability Analysis (NP Appendix 5) lost credibility when it described the Lutterworth Rd. site as a grass racing track (or similar) when in reality it is a paddock. In addition the size was incorrect and this was not checked, hence the re-assessment of sites. The Analysis is entirely subjective, For instance, judgements are made on noise impact but no noise readings are referred to and do not appear to have taken place, sites 4,6,7, and 8 are all on relatively straight sections of road with good visibility but the scores for pedestrian and vehicular access vary. Importantly in relation to site 4 the adverse impact of access requirements on trees (Jubilee trees on Lutterworth Rd.) have not been scored given that there is no existing footpath and the trees would have to be removed to provide one and suitable visibility splays to an access to the site. The Site Analysis also loses credibility using the walking distance to a PH as a significant determinant of the suitability of sites for housing. What criterion are used to decide the walking distances that determine a red, amber or green score and do they relate to the levels of alcohol consumed?</p> <p>6. Pp 34. There is no information as to how the numbers of dwellings on sites was arrived at. HDC use 30 dph and if the NP is to deliver a larger proportion of smaller dwellings to redress the imbalance in the housing stock one would logically expect a higher dph to have been used. I note that in the response to my Reg. 14 comments it was stated that a number of factors determined the site capacities. Unfortunately we do not know what these are.</p> <p>7. Pp 34 3rd para. I do not recall parishioners making any comments on density of development, this has not been evident in the consultations, and no calculations of existing development densities have been undertaken. So how can new development be judged to be similar? From the housing studies and consultation responses there is a clear requirement for more smaller dwellings which would increase density and therefore reduce the overall land requirement. To maintain existing densities (probably significantly below 30 dph) will do nothing to resolve the imbalance in the housing stock.</p>
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	Pp 34, Table:	<p>8. Pp 34, Table: The setting of targets below the capacity of a site (however that has been arrived at) will exacerbate the imbalance as it will merely reduce densities further. No justification or explanation is provided to substantiate this approach which is contrary to the stated need for smaller dwellings.</p>
	Pp 34	<p>9. Pp 34 There is also a clearly stated preference by villagers for a number of smaller sites rather than a few large sites. There are only 3 sites allocated and two of these are around the 20 mark, not exactly the preference of villagers.</p>
	Pp 36 Policy H4.	<p>10. Pp 36 Policy H4. HDC has confirmed that known "infill sites" as opposed to "windfall sites" can be taken into account in the housing land allocations. In the NP No account has been taken of "The Berries" SHLAA site which is now an infill between the PP. Site and farmhouse, or the planning permission for 5 houses at 1 Chapel St. Their inclusion in the allocation would reduce the total by 9-10 leaving 25-26 to be found on a couple of greenfield sites.</p>
	Pp35. Table.	<p>11. Pp35. Table. The indicative no. of 48 dwellings shown in the Reg14 version of the NP has now been deleted from the Table on pp35 but the previous table indicated the sites could accommodate a higher density. There is a clear need for more smaller dwellings (a higher density) not a lower No. (and a lower density). No indication is given of the density used to calculate numbers of dwellings so is there any rational basis for the housing allocations? Why does the NP not just use HDC's 30 dph as a starting point?</p>
	Pp35. Policy H3.	<p>12. Pp35. Policy H3. Each site is required to "maintain a similar density to adj....dwellings" No indication of this desired density is quoted, apart from which policy H5 requires smaller dwellings that implies a higher density than existing development. It would appear that the implications of this policy have not been thought through in the context of Policy H5..</p>
	Pp35. Policy H3.	<p>13. Pp35. Policy H3. If the infill sites are included in the allocation then just 2 other sites of 12- 14 dwellings would meet the allocation. At HDC's nominal density of 30 dph, these sites would only need to be 0.5 ha. It is a pity that the village has not been consulted on these issues or options for housing sites rather than being presented with a fait accompli.</p>
	Pp36. Policy H4	<p>14. Pp36. Policy H4. There is no logical explanation as to why windfall sites must be limited to 3 dwellings. Surely the No. is determined by what can reasonably be accommodated on a site within the LoD in accordance with planning standards?</p>
	Pp37.	<p>15. Pp37. This page unnecessarily repeats the basic data set out in the Village Profile at pp14- 15 and pp29-31.</p>

	Pp. 38. Policy H6	<p>16. Pp. 38. Policy H6. Personally I am not sure that HDC's standard of 40% of Affordable Housing is appropriate. What seems to be required is a larger proportion of smaller dwellings for sale at the lower end of the market. Perhaps the affordable element could be reduced and the need for smaller dwellings for sale strengthened. This policy could have unintended consequences in that developers could well reduce the density on allocated sites to 9 dwellings to avoid providing affordable housing. Can we be certain that HOC would refuse PP in such circumstances?</p>
	Pp 39. Policy H7	<p>17. Pp 39. Policy H7. Given the importance of obtaining and using developer contributions for the benefit of the village this is weak. I am sure villagers would have plenty of specific ideas if they had been consulted at the publicity events. There are a number of projects that may find favour with villagers ,if they had been given an opportunity to comment or make suggestions, such as the long term security of the Play Area, and its expansion to protect the open nature of the Glebe land, the long term availability of the Lutterworth Rd. sports field (the PC failed to follow through it's decision to designate this an Asset of Community value), the design and implementation of a scheme for the Cemetery extension, and continued restoration of the landscape of the existing Cemetery, bulb and tree planting on the village approaches and support for the Village Hall are just a few specific ideas that could be discussed. Unfortunately it looks as if it is too late to develop this policy in conjunction with the community.</p>
	Pp 40	<p>18. Pp 40 This is an historical narrative, not related to any specific policy and would be better as a precis in the village profile.</p>
	Pp 42 Map 5 . Policy ENV 1	<p>19. Pp 42 Map 5 . Policy ENV 1. The Cemetery is a burial ground and is presumably included as it is a contemplative site as defined in HDC's LP, so why is the churchyard not included for the same reason?</p>
	Pp 43. Policy ENV 1.	<p>20. Pp 43. Policy ENV 1. The Glebe is included in HDC's draft LP, (Appendix F entry LGS/SWIN 1) as a Local Green Space but there is no mention of the Village Green (a highway verge owned by LCC).</p>
	Pp 45.	<p>21. Pp 45. I cannot find any reference in HDC's draft LP, or it's Appendices, of any of the sites in ENV 1 being OSSR's. Have I missed something?</p>
	Pp 46. Map 7.	<p>22. Pp 46. Map 7. What is the relevance of this as it does not appear to relate to a policy. If it does where is the policy and would it not be more appropriate to add this information as an appendix to justify such policy?</p>
	Pp 47. Policy ENV 2.	<p>23. Pp 47. Policy ENV 2. There appears to be no evidence or background paper to support the contention that these sites are of "local significance" or are "locally valued". Oddly those sites on the periphery of the built up area seem to be designated to protect the views of residents in Lilbourne Lane,</p>

		<p>N. W. part of Chapel Fields, Shawell Rd. and. East of Stanford Rd. It is also interesting that the Lutterworth Rd. housing site is excluded but the Shawell Rd. housing site is included in the designation. Bearing in mind that all of these designated sites are outside the L. ofD. what is the point of this vague Policy?</p>
	Pp 52, Policy ENV 5.	<p>24. Pp 52, Policy ENV 5. This would appear to be irrelevant to an NP as Ridge and Furrow is not rare, and is not (as far as I know) statutorily protected, HDC's draft LP Appendix D does not include any Rand F in the District. Apart from which it can be ploughed up without PP.</p>
	Pp 54. Built Environment Section	<p>25. Pp 54. Built Environment Section. The Conservation Area is intended to protect the historic core. of the village which includes all the Listed Buildings. It is a pity that the NP does not make reference to the significance of the Conservation Area designation and recognise this by an appropriate policy, particularly to promote the local design vernacular. (see North Kilworth's design policy).</p>
	Pp 56 Policy ENV6.	<p>26. Pp 56 Policy ENV6. There is no Appendix defining the criterion for the Locally Listed Buildings, and in any event alterations to the exterior or interior of these buildings is not subject to planning control.</p>
	Pp 58. Policy ENV7.	<p>27. Pp 58. Policy ENV7. There is a famous planning adage "that one does not buy a view". There are no defined criterion for assessing these views, apart from which views 1, 2 and 3 have already been impacted upon by a PP (view 2) and proposed NP allocations (views 1 and 3). Significantly non-compliance with this policy did not score adversely in the Yourlocale site assessments.</p>
	Pp 60. Policy ENV8.	<p>28. Pp 60. Policy ENV8. Any development proposals are obliged to consider footpaths and formally apply for diversions or closures. The PC has never had a footpath monitoring regime in place. What are the enhancements that the PC will seek? In view of the statutory protection that footpaths and bridleways have this policy seems unnecessary.</p>
	Pp 61	<p>29. Pp 61. As the NP is to become a statutory document it should have accurate up to date maps.</p>
	Pp 63. Policy ENV10.	<p>30. Pp 63. Policy ENV10. Surely all that is required in the NP is a statement to the effect that development of the allocated sites and within the L of D are not at risk of flooding?</p>
	Pp 64-66.	<p>31. Pp 64-66. Much of this description is subjective rather than factual. For example - on pp 64, how can the loss of a shop and bus service have "opened up a wider range of shopping alternatives"? What criterion have been used to decide the Village Hall is well used?</p>
	Pp 67-68	<p>32. Pp 67-68 This could be condensed into a simple policy of supporting or designating Assets of Community Value although the PC's record of this is poor as after a year of failing to register the</p>

	<p>Pp 69-70.</p> <p>Pp72. Policy T2.</p>	<p>Sports Ground it gave up.</p> <p>33. Pp 69-70. Some of the transport proposals are vague aspirations not supported by facts or, importantly any evidence that finance might be available for implementation. The issue of congestion at school drop-off times was raised when the school was rebuilt and expanded but totally ignored by the Education Authority.</p> <p>34. Pp72. Policy T2. Currently there is very little traffic through the village other than at school opening and closing times. Parked vehicles on High St. and Chapel St. slow traffic down. A one-way system would probably increase traffic speeds because drivers would be confident of not meeting oncoming traffic.</p> <p>15-12-2017</p>
<p>Comments Submitted by: Resident 2</p> <p>Also submitted by: Resident 3 (slightly amended), Resident 4, Resident 5.</p>		<p>Response to submitted version of Swinford Neighbourhood Plan</p> <p>Apart from specific comments on the content of the N.P (which I shall submit separately}. I do not think that the process has complied with Government advice with particular regard to community engagement, consultation, and openness. I refer in particular to the advice given in Locality's N.P. Roadmap Guide, para. 1 pp 7, paras. 5 and 6 pp 8, Sections on Community and Stakeholder Engagement, pp 27 28-30, and, in particular, the statement at the top of pp 34.</p> <p>My principle concerns are that:-</p> <p>1. In early 2015 the Parish Council (PC) set up a working party, (later called the NP Advisory Committee) to prepare a draft NP on it's behalf. The Terms of Reference approved in January 2016 stated that NPAC meetings were to be held at least every two months (see para 4a) and were to be open to the public.(see para 4h). On 13th April 2017 the NPAC met and discussed the options for resolving the errors in the housing section of the first Reg 14 draft of the NP. The next recorded meeting of the NPAC was at 7pm on 12th September 2017 when it resolved to recommend the PC approve a revised NP for submission to HDC. At it's meeting at 7.30 on the same evening the PC resolved to submit the revised version of the NP to HDC (Minute 17-153). There were no recorded meetings of the NPAC between April and September 2017. This was contrary to the NPA Terms of Reference.</p> <p>2. A presentation of the revised housing section of the NP was held on 2nd June 2017. As there had not been a meeting of the NPAC since April this had clearly not been formulated or agreed by the NPAC an was outside the public domain, contrary to the NPAC T of R.. Who authorised the work, who wrote the revisions and who agreed the presentation and it's format?</p> <p>3. Unfortunately the Housing presentation was just that. Parishioners were shown a slide of potential</p>

	<p>housing sites and told that three had been chosen to meet the housing allocation for Swinford (presumably by whoever had designed the presentation) The choice, seemingly, was based primarily on the scores in the Site Sustainability Analysis done by Your locale. At, and following the presentation there was no formal consultation process and villagers were not given a range of options or sites about which they could express a preference prior to the housing allocations being finalised. The villagers previous comments and preferences appeared to be given little weight.</p> <p>4. At the meeting on 11th July the PC approved a revised version of the NP with an updated housing section, essentially the proposals put forward at the presentation on 2nd June, and also agreed that this be the subject of a second Reg 14 consultation. There had been no NPAC meetings since April so this revised version of the NP could not have been considered or produced by the NPAC. Surely this is contrary to the NPAC T. of R. If the revised draft NP had not been produced and recommended by the NPAC to the PC then who wrote it and with what authority?</p> <p>5. Appendices Qii, Rii, Riv, of the submission version of the NP are all titled "NPAC response". This is misleading as none of the correspondence was considered by the NPAC which had not met since April.</p> <p>6. As a consequence of discovering the mistake in the size of the Lutterworth Rd. site during the first reg 14 consultation in Feb/March 2017, 61 residents signed a petition (unnumbered Appendix to NP submission to HOC) expressing genuine concern about a number of issues. This petition was addressed to the NPAC but was not submitted to or considered by the NPAC. Sadly, instead, the initial responses by the Chairperson of the NPAC was to demand to know who had penned the letter and to criticise the first signatory on social media. In June a full response was circulated to petitioners. As the original petition had not been submitted to or considered by the NPAC, as requested, the response was clearly not from the NPAC and presumably does not represent it's views. Whoever wrote the response appeared to be unwilling to concede that any of the villager's concerns had any merit and much of the response is, in my view disingenuous. I will make just four observations, A. None of HDC's 9 Options allocated 48 dwellings to Swinford, B. None of the remaining 4 Options allocated 48 dwellings to Swinford (the favoured option allocated 36), C. The petition was based on information obtained in the 3 weeks prior to it's submission, not from 2015. D. How are the public supposed to make rational comments on the Draft NP if it's policies are based on confidential information obtained from HOC and which is not in the public domain?</p> <p>7. The notification of the PC meeting arranged for Tues.12th September was posted on Thur. 7th September. At that time the PC Standing Orders (Paras. 3 b and c) required three clear days notice of meetings, excluding Saturday. The notice of the meeting did not give three clear days and so the PC had not complied with it's S.O.'s. The meeting was therefore unlawful and any decisions taken would in my view also be unlawful. The PC attempted to rescue the situation by holding the meeting, introducing at the beginning, a procedural motion to suspend those particular S.O.'s (see pre-amble to Minutes). I can find nothing in the PC S.O.'s or other advice that indicates that omissions or errors in complying with S.O.'s can be resolved by</p>
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	<p>retrospective decisions. It was at this meeting that the PC resolved to approve the submission of the NP to HDC.</p> <p>8. The untitled plan at pp 34 of the second Reg 14 draft NP which identified the location of all the potential housing sites was crude and hand drawn. Site 6 appears to be about double the size of Site 7 but is allocated four times the number of houses. It is also about half the size of Site 4 but is allocated almost the same number of houses. It was therefore impossible to make any rational comments on the relative merits of the sites. It is only in the submission version of the NP at pp 33 that the sites have, what appear to be, properly drawn boundaries. The proportionate sizes of the sites have not changed. As this untitled plan has only appeared in the submission version of the NP. It has not been the subject of previous consultation and villagers have not been able to comment to date.</p> <p>9. Another serious omission that has deprived the villagers of the opportunity to comment relates to the Limits to Development (LtD). The untitled plan at pp 24 of the Reg 14 draft NP was actually the current LtD and clearly dated 2011. The updated Map 1 at pp 23 of the submission version of the NP has not been the subject of any prior consultation and like much of the rest of the document has not been the subject of consideration by the NPAC (apart from the rubber stamp approval on 12th Sept.). The plan now incorporates the proposed housing allocations, the site south of "The Berries" on Stanford Rd. which has planning permission, which is logical. Elsewhere, instead of closely following the existing boundary of the built up area the boundary incorporates open and undeveloped land to the south and east of the two new dwellings on the east side of Stanford Rd. As Policy S1 clearly states that "development proposals within the Plan area will be supported on sites within the LtD....." the plan now incorporates a further potential site for roughly 6-8 houses without acknowledging it as such. I can see no logic in the LtD boundary not following the curtilage of the existing housing as it does elsewhere. As the NPAC has not even considered the future LtD and there has been no consultation on the LtD boundary villagers will be unaware of this issue. This also again begs the question as to who or whom decided the proposed LtD if it was not the NPAC?</p> <p>10. The analysis of responses to the second Reg. 14 consultation (Appendix P to the submission version of the NP) is interesting. It is undated but was probably undertaken in August following the closure of the consultation period. As there were no meetings of the NPAC at this time it can only have been produced by a person or persons unknown { there is no author reference }. What is certain is that the document was not the subject of debate or approval by either the NPAC or PC. Analysis of the parishioner comments indicates that approx.34 resulted in minor amendments or corrections to the text of the NP and approx 246 relating to more substantive issues resulted in no action. It would appear that this Analysis is based on the personal opinion of the unknown author rather than a balanced and collective debate by the NPAC.</p> <p>11. At the NPAC meeting on 17th Oct . it was agreed to send a letter to village organisations inviting them to meet members of the NPAC. This may have been helpful if the letter had been sent, and meetings arranged, prior to the consultation on the submission version of the NP. However the letter was not sent until 9th Dec.,</p>
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		<p>(nearly 9 weeks later) and only 1 ½ weeks before the consultation closing date and 2 weeks before Christmas, when it would be impossible to either arrange a meeting or be able to comment. In addition the PC has cancelled it's scheduled December meeting. Neither of these actions appear to encourage or facilitate the involvement of the village in the NP process.</p> <p>In conclusion I do not consider that the process of preparing the final Reg 14 draft NP, or the submission version complies with either the letter or spirit of Government advice. There is no evidence to show that the NPAC has had any formal involvement in the formulation and revision of either of these documents, or have made any recommendations to the PC regarding them (other than the rubber stamp meeting on 12th Sept.). Furthermore there were serious errors and omissions relating to the housing and LtD elements of the second Reg 14 version of the NP which were not addressed by the NPAC and have only been finalised in the submission version of the NP These have not been the subject of any consultation with villagers.</p> <p>In the circumstances one can only draw the conclusion that the finalisation of the NP since the last meeting of the NPAC in April 2017 has been done by a person or persons unknown reporting (eventually) direct to the PC. This hardly seems to accord with the transparent and inclusive aspirations as espoused in Government advice, and since April 2017 whoever has been involved with the NP (from the evidence, not the NPAC) seems to have progressively excluded the community from any meaningful consultation or influence on the NP.</p> <p>12-12-2017</p>
Resident 4		<p>I have serious concerns with regard to the process of the Neighbourhood Plan development and approval for the village of Swinford.</p> <p>In my opinion, steps have been taken to mislead and cover certain elements of the Plan in an attempt to cut villagers out of decision making.</p> <p>Please see attached concerns as listed by xxx, with which I agree entirely.</p> <p>(See submission from Resident 2 above)</p>
Resident 5		<p>Please see attached document written by xxx.</p> <p>I fully support the points made in this document.</p> <p>(See submission from Resident 2 above)</p>
Resident 3		<p>Representation to Swinford Neighbourhood Plan, submitted version to HDC</p> <p>It is clear that the process of preparing the N.P. has not followed Government advice in particular with regard to community engagement, consultation, and openness. I refer in particular to the advice given in Locality's N.P. Roadmap Guide, para. 1 pp 7, paras. 5 and 6 pp 8, Sections on Community and Stakeholder Engagement,</p>

	<p>pp 27 28-30, and, in particular, the statement at the top of pp 34.</p> <p>I have particular concerns, as follows:-</p> <ul style="list-style-type: none"> •In early 2015 the Parish Council (PC) set up a working party, (later called the NP Advisory Committee) to prepare a draft NP on its behalf. The Terms of Reference approved in January 2016 stated that NPAC meetings were to be held at least every two months (see para 4a) and were to be open to the public. (See para 4h). On 13th April 2017 the NPAC met and discussed the options for resolving the errors in the housing section of the first Reg 14 draft of the NP. The next recorded meeting of the NPAC was at 7pm on 12th September 2017; here it resolved to recommend the PC approve a revised NP for submission to HDC. At its meeting at 7.30 pm on the same evening the PC resolved to submit the revised version of the NP to HDC (Minute 17-153). There were no recorded meetings of the NPAC between April and September 2017. This is in clear contravention of the NPAC's own Terms of Reference. •A presentation of the revised housing section of the NP was held on 2nd June 2017. As there had not been a meeting of the NPAC since April this had clearly not been formulated or agreed by the NPAC and was outside the public domain, contrary to the NPAC's own Terms of Reference. So, this raises the issue as to who authorized the work, who wrote the revisions and who agreed the presentation and its format? The Housing presentation was just that. Parishioners were shown a slide of potential housing sites and told that three had been chosen to meet the housing allocation for Swinford (presumably by whoever had designed the presentation) The choice, seemingly, was based primarily on the scores in the Site Sustainability Analysis done by Your locale. At the presentation and subsequently there was no formal consultation process and parishioners were not given a range of options or sites about which they could express a preference prior to housing allocations being finalized. Also parishioner's previous comments and preferences appeared to be given little or no weight. •At the PC meeting on 11th July the PC approved a revised version of the NP with an updated housing section, essentially the proposals put forward at the presentation on 2nd June, and also agreed that this be the subject of a second Reg. 14 consultation. There had been no NPAC meetings since April so this revised version of the NP could not have been considered or produced by the NPAC. Clearly this is contrary to the NPAC's own T. of R. If the revised draft NP had not been produced and recommended by the NPAC to the PC then who wrote it and with what authority? • Appendices Qii, Rii, Riv, of the submission version of the NP are all titled "NPAC response". This is misleading as none of the correspondence was considered by the NPAC which, unless un-recorded and against its own T.of R. had not met since April. •As a consequence of the actions of various Parishioners who discovered a significant and major mistake in the size of the Lutterworth Rd. site during the first reg 14 consultation in Feb/March 2017, 61 residents signed a
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	<p>petition (unnumbered Appendix to NP submission to HDC) expressing genuine concern about a number of issues. This petition was addressed to the NPAC but was not submitted to or considered by the NPAC. Sadly, instead, the initial response by the Chairperson of the NPAC was to demand to know who had penned the letter and to criticise the first signatory on social media. In June a full response was circulated to petitioners. As the original petition had not been submitted to or considered by the NPAC, as requested, the response was clearly not from the NPAC and presumably does not represent its views. Whoever wrote the response appeared to be unwilling to concede that any of the parishioner's concerns had any merit and much of the response is, in my view, is simply wrong. I will make just four observations, (1) None of HDC's 9 Options allocated 48 dwellings to Swinford, (2) None of the remaining 4 Options allocated 48 dwellings to Swinford (the favoured option allocated 36), (3) The petition was based on information obtained in the 3 weeks prior to it's submission, not from 2015. (4) How are the public supposed to make rational comments on the Draft NP if it's policies are based on confidential information obtained from HDC and which is not in the public domain?</p> <ul style="list-style-type: none"> • The notification of the PC meeting arranged for Tues. 12th September was posted on Thur. 7th September. At that time the PC Standing Orders (Paras. 3 b and c) required three clear days notice of meetings, excluding Saturday. The notice of the meeting did not give three clear days and so the PC had not complied with it's S.O.'s. The meeting was therefore unlawful and any decisions taken would in my view also be unlawful. The PC attempted to rescue the situation by holding the meeting, introducing at the beginning, a procedural motion to suspend those particular S.O.'s (see pre-ambule to Minutes). I can find nothing in the PC S.O.'s or other advice that indicates that omissions or errors in complying with S.O.'s can be resolved by retrospective decisions. It was at this meeting that the PC resolved to approve the submission of the NP to HDC. •The untitled plan at pp 34 of the second Reg 14 draft NP which identified the location of all the potential housing sites is crude and hand drawn. Site 6 appears to be about double the size of Site 7 but is allocated four times the number of houses. It is also about half the size of Site 4 but is allocated almost the same number of houses. It was therefore impossible to make any rational comments on the relative merits of the sites. It is only in the submission version of the NP at pp 33 that the sites have, what appear to be, properly drawn boundaries. The proportionate sizes of the sites have not changed. As this untitled plan has only appeared in the submission version of the NP. It has not been the subject of previous consultation and villagers have not been able to comment to date. • Another serious omission that has deprived the parishioners of the opportunity to comment relates to the Limits to Development (LtD). The untitled plan at pp 24 of the Reg 14 draft NP was actually the current LtD and clearly dated 2011. The updated Map 1 at pp 23 of the submission version of the NP has not been the subject of any prior consultation and like much of the rest of the document has not been the subject of consideration by the NPAC (apart from the rubber stamp approval on 12th Sept.). The plan now incorporates the proposed housing allocations, the site south of "The Berries" on Stanford Rd. which has planning permission, which is logical. Elsewhere, instead of closely following the existing boundary of the built up area the boundary incorporates open and undeveloped land to the south and east of the two new dwellings on the
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	<p>east side of Stanford Rd. As Policy S1 clearly states that "development proposals within the Plan area will be supported on sites within the LtD....." the plan now incorporates a further potential site for roughly 6-8 houses without acknowledging it as such. I can see no logic in the LtD boundary not following the curtilage of the existing housing as it does elsewhere. As the NPAC has not even considered the future LtD and there has been no consultation on the LtD boundary parishioners will be unaware of this issue. This also again begs the question as to whom or who decided the proposed LtD if it was not the NPAC?</p> <p>•The analysis of responses to the second Reg. 14 consultation (Appendix P to the submission version of the NP) is interesting. It is undated but was probably undertaken in August following the closure of the consultation period. As there were no meetings of the NPAC at this time it can only have been produced by a person or persons unknown (there is no author reference)? What is certain is that the document was not the subject of debate or approval by either the NPAC or PC. Analysis of the parishioner comments indicates that approx.34 resulted in minor amendments or corrections to the text of the NP and approx 246 relating to more substantive issues resulted in no action. It would appear that this Analysis is based on the personal opinion of the unknown author rather than a balanced and collective debate by the NPAC and as such cannot be right.</p> <p>•At the NPAC meeting on 17th Oct. it was agreed to send a letter to village organisations inviting them to meet members of the NPAC. This may have been helpful if the letter had been sent, and meetings arranged, prior to the consultation on the submission version of the NP. However the letter was not sent until 9th Dec., (nearly 9 weeks later) and only 1 ½ weeks before the consultation closing date and 2 weeks before Christmas, when it would be impossible to either arrange a meeting or be able to comment. In addition the PC has cancelled its scheduled December meeting without the courtesy of a reason to parishioners who the PC is supposed to represent. Neither of these actions appear to encourage or facilitate the involvement of the village in the NP process.</p> <p>In conclusion I do not consider that the process of preparing the final Reg 14 draft NP, or the submission version complies with either the letter or spirit of Government advice . There is no evidence to show that the NPAC has had any formal involvement in the formulation and revision of either of these documents, or have made any recommendations to the PC regarding them (other than the rubber stamp meeting on 12th Sept.). Furthermore there were serious errors and omissions relating to the housing and LtD elements of the second Reg 14 version of the NP which were not addressed by the NPAC and have only been finalized in the submission version of the NP These have not been the subject of any consultation with parishioners.</p> <p>In the circumstances one can only draw the conclusion that the finalization of the NP since the last meeting of the NPAC in April 2017 has been done by a person or persons unknown reporting (eventually) direct to the PC. This hardly seems to accord with the transparent and inclusive aspirations as espoused in Government advice, and since April 2017 whoever has been involved with the NP (from the evidence, not the NPAC) seems to have progressively excluded the community from any meaningful consultation or influence on the NP.</p>
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		<p>I trust my comments will be taken into consideration.</p> <p>15-12-2017</p>
Highways England		<p>CONSULTATION ON THE SUBMISSION VERSION OF THE SWINFORD NEIGHBOURHOOD DEVELOPMENT PLAN</p> <p>Highways England welcomes the opportunity to comment on the submission version of the Swinford Neighbourhood Development Plan which covers the period 2017-2031. It is noted that this constitutes the consultation on the Plan submitted to Harborough District Council.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth.</p> <p>In relation to the Swinford Neighbourhood Plan, M1/A14 junction is located towards the south of the Neighbourhood Plan area. However direct access to the SRN is via M6 J1, A14 J1 and M1 J20, which are situated approximately 4 miles to west, 7 miles to the east, and 4 miles to the north of the Neighbourhood Plan Area respectively.</p> <p>Highways England understands that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies, Accordingly, the Neighbourhood Plan for Swinford is required to be in conformity with the Harborough Local Plan and this is acknowledged within the document.</p> <p>We previously commented on the draft pre-submission version of this document in August 2017, when we stated that the small scale of dwellings coming forward by 2031 (35 dwellings) would have no impacts upon the operation of the SRN. We understand that no changes have been made to this allocation and therefore have no additional comments to provide.</p> <p>As was the case with the previous consultation letter, reference is made to the 'Highways Agency' in the consultation letter and it should be noted that from April 2015, the Highways Agency became a government-owned company, under the new name "Highways England" and should be referred to as such going forward.</p> <p>Highways England has no further comments to provide, and trusts the above is useful in the progression of the Swinford Neighbourhood Plan.</p>

<p>Amec Foster Wheeler on behalf of National Grid</p>	<p>Swinford Neighbourhood Plan Consultation SUBMISSION ON BEHALF OF NATIONAL GRID</p> <p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.</p> <p>About National Grid</p> <p>National Grid owns and operates the high voltage electricity transmission system in England and Wales and operate the Scottish high voltage transmission system. National Grid also owns and operates the gas transmission system. In the UK, gas leaves the transmission system and enters the distribution networks at high pressure. It is then transported through a number of reducing pressure tiers until it is finally delivered to our customers. National Grid own four of the UK's gas distribution networks and transport gas to 11 million homes, schools and businesses through 81,000 miles of gas pipelines within North West, East of England, West Midlands and North London.</p> <p>To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets.</p> <p>Specific Comments</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p> <p>Key resources / contacts</p> <p>National Grid has provided information in relation to electricity and transmission assets via the following internet link: http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</p> <p>The electricity distribution operator in Harborough District Council is Western Power Distribution. Information regarding the transmission and distribution network can be found at: www.energynetworks.org.uk</p> <p>Please remember to consult National Grid on any Neighbourhood Plan Documents or site-specific proposals</p>
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		that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:
Natural England		<p>Thank you for consulting Natural England on the Swinford Neighbourhood Plan which has now been submitted to Harborough District Council for Examination.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England has already commented on the Swinford Neighbourhood Plan in response to a consultation from Swinford Parish Council. Natural England does not consider that the plan will have any likely significant effects on any internationally or nationally designated nature conservation sites and welcomes the broad principles of the plan and some of the specific policy proposals. It is consistent with the National Planning Policy Framework (NPPF) and set within the context of Harborough District Council's existing Core Strategy and emerging Local Plan. We particularly welcome POLICY ENV4: BIODIVERSITY which aims to ensure that development proposals will safeguard significant local habitats and species, especially those protected by relevant English and European legislation, and to create new habitats for wildlife.</p>
National Farmers Union		<p>Thank you for consulting the NFU about the neighbourhood development plan. Our general comments on the neighbourhood plan are as follows:-</p> <p>The NFU has 4,800 farmer members out of the 6,000 farmers in the East Midlands region who are commercial farmers. About 80 per cent of land within this part of Leicestershire is farmed. The viability and success of farmers near Swinford is crucial to the local economy and the environment. Farmers need local plan policies which enable:-</p> <ul style="list-style-type: none"> - New farm buildings needed by the business. This could be for regulatory reasons (e.g. new slurry stores) or because new or more crops and livestock are being farmed (grain stores, barns, livestock housing etc). - Farm and rural diversification. Some farmers will be in a good position to diversify into equine businesses, on farm leisure and tourism and in other sectors which will help boost the local economy and support the farm business. - On farm renewable energy. Farms can be ideal places for wind turbines, pv, solar, anaerobic digestion, biomass and biofuels plant provided they do not cause nuisance to others. The UK must meet a target of 15% renewables by 2020. Currently we are not meeting this target but on farm renewables can help us to meet it. - Conversion of vernacular buildings on farms into new business use or residential use. This enables parts of older buildings to be preserved whilst helping the economy and the farm business. <p>The NFU will be looking to see that the neighbourhood plan has policies which positively encourage the above and do not deter them because of, for example, restrictive landscape designations and sustainable transport</p>

		<p>policies which imply that all development needs to be by a bus stop. There can also be issues about new buildings being sited too close to noisy or smelly farm buildings which cause nuisance to new householders and lead to abatement notices being served on longstanding businesses. We would urge the local planning authority to be especially careful before granting permission to residential development near to bad neighbour uses.</p>
<p>Harborough District Council Planning Policy</p>	<p>Policy S1</p> <p>Policy H1</p> <p>Policy H2</p> <p>Policy H3</p>	<p>General – some of the criteria in policies use numbers, some bullet points and some letters. Suggest a consistent approach for clarity.</p> <p>General point: The plan overall should make it easier for the reader/user to know exactly the sites to which the policies refer, their boundaries and why they have been designated or identified without reference to background information such as the environmental inventory. Maps are often poorly related to policies and not referred to appropriately.</p> <p>Numbering/lettering of sections not clear. Built Environment (including Statutorily Listed Buildings, Locally Listed Buildings) comes between sections f) Ridge and Furrow and g) Views. Rights of Way section comes after g) Views and before h) Sustainable Development.</p> <p>Local Planning Context: Please note that the Local Development Scheme was updated in December 2017 and adoption is not expected in December 2018.</p> <p>Policy S1 - might be better worded if it also states the policy for development outside of the limits. ‘And subject to design and amenity considerations’ unnecessary as they form part of the policies of the NP already referred to in the policy.</p> <p>Policy H1 – this policy is quite prescriptive. There are some statements that are subjective and may be open to interpretation. This may not give decision makers clarity and certainty when determining applications. It is hard to see how Policy H1 will be delivered consistently, it is very subjective. Policy H1 – suggest ‘should’ instead of ‘are encouraged to’.</p> <p>Page 31 and page 32. The map titles have become separated from the maps.</p> <p>The maps on pages 32 and 33 (SHLAA sites) may need a larger scale to be clear.</p> <p>Policy H2 - H2 is not really a policy, it is a statement, it might be better added into H3</p> <p>Policy H3 – The Map 4 has sites labelled as ‘Areas’. The policy refers to ‘sites’. Suggest consistency of reference to prevent confusion.</p> <p>The final sites should have a map each to clarify the boundaries in detail with sites named (rather than referring to Site 6/Site 4/Site 7). Currently the map is referred to as being ‘below’ when it is actually on page 33 above.</p>

		<p>The map/maps showing the allocations needs to immediately follow the policy for clarity. Some of the 'areas' do not seem to follow field boundaries which may be confusing.</p> <p>Policy H3 – Area 7 – Shawell Road for 4 dwellings is entirely within the environmental site number 151. Policy ENV2 states that: <i>'Development proposals that affect them will be expected to protect or enhance the identified features'</i> . Environmental Inventory for site 151 states: <i>'The Leys. (Morris) Grazing field. Access via footpath X10. Separated on west from site 150 by small tributary stream. Historically this field was part of the course of Swinford Races (1870-74). Valued open space in community consultations.'</i></p> <p>While the inclusion in the environmental inventory may not exclude development on this site it may have been prudent to include criteria for preserving the features that are important.</p>
	Policy H4	Policy H4 – the limit of 1 to 3 units for windfall sites seems an arbitrary number. In some circumstances 4 or 5 may be appropriate. It is suggested that this policy is more lenient concerning the number of dwellings, especially to support policy H5 which calls for smaller houses.
	Policy H4	Policy H4 - the limits to development determine the shape and form so bullet point 2 is unnecessary
	Policy H5	Policy H5 – implementation of this policy needs to be considered. Does it apply to all sites irrespective of size? Clarity is required. More than 50% of a 2 dwelling development would need both dwellings to be 3 or fewer bedrooms. There is nothing to ensure that dwellings of fewer than 3 bedrooms are delivered.
	Policy H6	Policy H6 – part of H6 is repetition of District Policy and NPPF. The local connection to Swinford is relevant just to Swinford.
	Policy H7	Policy H7 – the identified uses for S106 contributions may not be specific enough. A community action could be to identify specific projects to utilise any developer contributions. I note that Policy T1 has some specific projects for traffic management
	Policy E5	Policy E5 – Permitted development of extensions and free standing buildings has not been taken account of in this policy
		Page 54 Statutorily Listed Buildings - the reference to Map 12 is not correct. Map 12 shows important views. Map 10 is imprecise.
	Policy ENV1	Policy ENV1: Boundaries of each individual proposed Local Green Space need to be clear. Use of numbers is confusing. The Glebe is referred to in supporting text but not in policy. I think there needs to be a clear description of each LGS in the supporting text – don't just rely on the Environmental Inventory.

	<p>Policy ENV2</p> <p>Policy ENV3</p> <p>Policy ENV6</p> <p>Policy ENV9</p> <p>Policy ENV10</p> <p>Policy T1</p> <p>Policy E2</p> <p>Policy E3</p> <p>Policy E5</p>	<p>Map 7: Not sure that this belongs in the NP. Its value is questioned and should be in a background document.</p> <p>Policy ENV2 - should list the sites – where are the features identified?</p> <p>Policy ENV3: I think this policy should be more positively phrased. The first part of the policy is overly onerous.</p> <p>ENV6 Locally Listed Buildings – Map 11 is imprecise, with buildings grouped together. Concept of grouping is not precise enough. It is not possible to see which buildings the policy exactly relates to. Buildings need listing within the policy. Text does not contribute to a deliverable policy.</p> <p>ENV9 – Policy could be rewritten: ‘Development proposals should demonstrate..... ‘</p> <p>Policy ENV 10 – a map would be useful showing flooding</p> <p>Policy T1 – ‘strongly supported’ is a subjective term. Policy T1 does not read as a policy. Advise taking out the priorities for residents as listed and putting them in the supporting text.</p> <p>Policy E2 – suggest that the criteria are lettered consecutively rather than restarting at (a). Question use of criterion h) (is well integrated into and complement existing businesses) in relation to new employment generating opportunities – appears unnecessarily restrictive.</p> <p>Policy E3 – this policy has bullet points rather than letters. Suggest using letters for consistency.</p> <p>Policy E5 – free standing buildings are subject to permitted development in some circumstances. This should be clarified in the supporting text.</p>
<p>Local Landowner</p>	<p>Pages 33,34 and 35 Submission version of the Swinford Neighbourhood Plan.</p>	<p>My comments are specifically aimed at the housing allocation sites.</p> <p>As a landowner I put forward two proposed sites (xxxxx). These sites were not independently assessed by Your Locale as claimed by the NPAC. I can provide numerous factual physical evidence which proves this. No grey areas just black and white hard physical evidence. When errors were presented to the Parish Councillors they choose to correct some of my findings, however, they still choose to ignore physical evidence that did not suit their pre - determined site allocation. All sites were scored by Your Locale/NPAC. These sites were then ranked in order to determine the suitability for allocation of sites for proposed development. Scoring across the sites has not been consistently applied. Some rules apply to some sites and not others!</p> <p>Xxx (redacted section – personal)</p> <p>Site 3 Rugby Road (Glebe Land) has had its score downgraded by the NPAC by two points. It should score plus</p>

	<p>H3 page 35</p> <p>H1 page 28</p>	<p>obtained?" my question was not answered.</p> <p>Sites are assessed as to whether they are within the new LTD: the new LTD was defined after NPAC chose site 4 early in the process. Other sites were then assessed based on being inside/outside the new LTD. Non-scientific, biased.</p> <p>Assessment of Site 4 says: "The views from the Cottage would not be significantly affected by the development with careful design - other aspects from the Cottage are more critical." NONSENSE! The house is on the North side of the plot, about 66% of our plot is on the Site 4 side, 34% is away from Site 4. Our plot is adjacent to Site 4 on 2 sides. Biased.</p> <p>Was the comment above written by the assessor, or by NPAC?</p> <p>As can be seen above, the views from the Cottage will be severely impacted by developing Site 4.</p> <p>If the old adage "you can't buy a view" is correct, is it justified/legal for the NPAC to defend its decision by making pronouncements on the view?</p> <p>H3 states that, regarding Site 4: "The development should provide for around 17 dwellings on greenfield land to maintain a similar density to adjacent existing dwellings;"</p> <p>H1 states that: "Development should be of a similar density to properties in the immediate surrounding area as far as possible"</p> <p>I commented that "The proposed development at site 4 clearly does not maintain a density which is in keeping with the local environment. The two dwellings adjacent to site 4 are of about 7.5 dph, the proposed development of site 4 is about 18 dph",</p> <p>to which the NPAC replied: "We do not believe that using a dph based on two neighbouring houses to be representative".</p> <p>(My emboldening) The reply to my question is clearly contradictory to the statements in H1 and H3 of the Plan.</p> <p>We feel patronised by our house being selected as a Local Heritage Asset, told it will be treated as above, and the policies stated by the Draft being ignored.</p>
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	<p>Env 6 page 57</p> <p>Page 34</p> <p>Page 64</p>	<p>This states: “Development proposals that affect an identified non-designated building or structure of local historical or architectural interest or its setting will be expected to conserve or enhance the character, integrity and setting of that building or structure.” Lodge Cottage is one of those buildings.</p> <p>Building 17 houses on Site 4 is 240% (an increase of 140%) of the density of the adjacent existing dwellings/properties in the immediate surrounding area. When I asked how this enhances Lodge Cottage NPAC did not answer my question.</p> <p>After the initial four sites were voted on by parishioners, new sites were selected which parishioners were not given the chance to vote on. An accurate plan of housing sites was only produced in the submission version of the Plan. This means that villagers have been unable to comment properly on what is probably the most important issue in the Plan.</p> <p>From a legal aspect, why have the villagers been denied the chance to vote on this?</p> <p>Not all landowners were approached as voiced by one at a public meeting. Biased.</p> <p>The Plan states: “However, in recent years Swinford has suffered the loss of some amenities such as a local shop and public transport. These have not been replaced, although there is the use of the community bus which is operated and run by a local charity. This has increased the need for car ownership but has opened up a wider range of shopping alternatives than what was available locally.”</p> <p>How does the closure of the shop open up a wider range of shopping alternatives? The other shopping alternatives were available when the shop was open, but now they are the only choice residents have.</p>
<p>Sport England</p>		<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for</p>

	<p>sport as set out in the NPPF with particular reference to Pars 73 and 74. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Planning Policy Statement: ‘A Sporting Future for the Playing Fields of England’. http://www.sportengland.org/playingfieldspolicy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 74 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England’s guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p>
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	<p>In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England’s Active Design Guidance: https://www.sportengland.org/activedesign</p> <p><i>(Please note: this response relates to Sport England’s planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p> <p>If you need any further advice, please do not hesitate to contact Sport England using the contact details below.</p>
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