

	<p>views and skylines</p> <p>GG13 Ridge and Furrow</p>	<p>the site is not developed and the harm to these views is a material consideration if it is.</p> <p>It is important that ridge and furrow is preserved. With reference to the Oaks Road site, the inspector saw no reason why the ridge and furrow on the south field should not be preserved. Harm to the ridge and furrow should be a material consideration if the site is developed.</p>
<p>National Grid</p>		<p>Great Glen Neighbourhood Plan Consultation SUBMISSION ON BEHALF OF NATIONAL GRID</p> <p>National Grid has appointed Wood to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.</p> <p><u>About National Grid</u></p> <p>National Grid Electricity Transmission plc (NGET) owns and maintains the electricity transmission system in England and Wales and National Grid Electricity System Operator (NGESO) operates the electricity transmission network across the UK. The energy is then distributed to the eight electricity distribution network operators across England, Wales and Scotland.</p> <p>National Grid Gas plc (NGG) owns and operates the high-pressure gas transmission system across the UK. In the UK, gas leaves the transmission system and enters the UK's four gas distribution networks where pressure is reduced for public use.</p> <p>National Grid previously owned part of the gas distribution system known as 'National Grid Gas Distribution limited (NGGDL). Since May 2018, NGGDL is now a separate entity called 'Cadent Gas'.</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 National Grid's assets.</p> <p>Assets in your area</p> <p>National Grid has identified the following high-pressure gas transmission pipeline as falling within the Neighbourhood area boundary:</p> <ul style="list-style-type: none"> • FM04 - Tixover to Blaby <p>From the consultation information provided, the above gas transmission pipeline does not interact with any of the proposed development sites.</p> <p>Gas Distribution – Low / Medium Pressure</p> <p>Whilst there are no implications for National Grid Gas Distribution's Intermediate / High Pressure apparatus, there may</p>

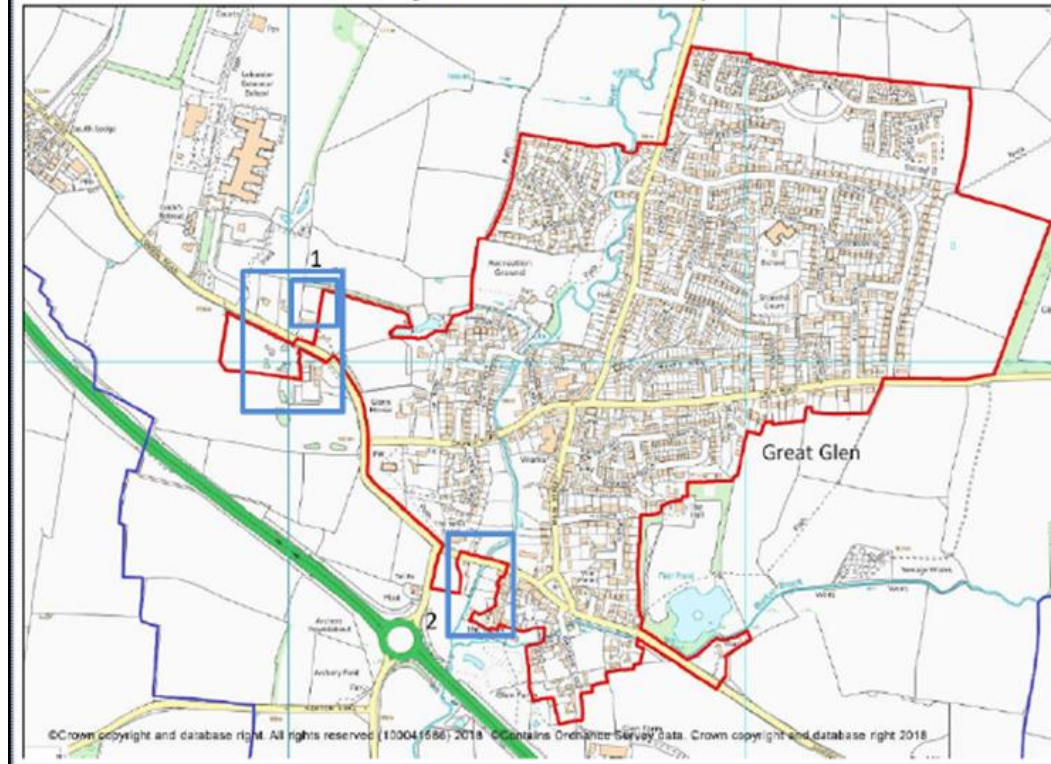
		<p>however be Low Pressure (LP) / Medium Pressure (MP) Gas Distribution pipes present within proposed development sites. If further information is required in relation to the Gas Distribution network, please contact plantprotection@cadentgas.com</p> <p>Electricity distribution</p> <p>Information regarding the distribution network can be found at: www.energynetworks.org.uk</p>
Highways England		<p>We welcome the opportunity to comment on the Submission Version of the Great Glen Neighbourhood Plan which has been produced for public consultation and covers the Plan period 2011-2031. The document provides a vision for the future of the area and sets out a number of key objectives and planning policies which will be used to help determine planning applications.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Great Glen Neighbourhood Plan, our principal interest is in safeguarding the M1 and M69 Motorways which route 7 miles west and the A46 Trunk Road which routes 10 miles north of the Plan area.</p> <p>We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for the Parish of Great Glen has been prepared in conformity with the adopted Harborough Local Plan (2011-2031) and this is acknowledged within the document.</p> <p>In our response to the Pre-Submission version of the Great Glen Neighbourhood Plan dated January 2019 we noted that 274 dwellings had already been approved in the Parish, exceeding the residual requirement of 35 dwellings set out in the Harborough Local Plan. This is recognised in the Great Glen Neighbourhood Plan, which states that there is currently no outstanding residual requirement for development in Great Glen in the period to 2031. It is noted that in line with the Local Plan, the Great Glen Neighbourhood Plan proposes to support windfall sites. In this regard a housing supply of 1 or 2 dwellings a year is expected.</p> <p>We also note that Policy GG1 - Residential Site Allocation of the Great Glen Neighbourhood Plan allocates the site known as 'land north of Glen House' for residential development for around 10 dwellings. Due to the small scale of development growth being proposed, it is not considered that there will be any impacts on the operation of the SRN.</p> <p>We have no further comments to provide and trust that the above is useful in the progression of the Great Glen Neighbourhood Plan.</p>
Sport England		<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</p>

	<p>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 sport as set out in the NPPF with particular reference to Pars 96 and 97. 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 Playing Fields Policy and Guidance document. 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 97 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>
--	---

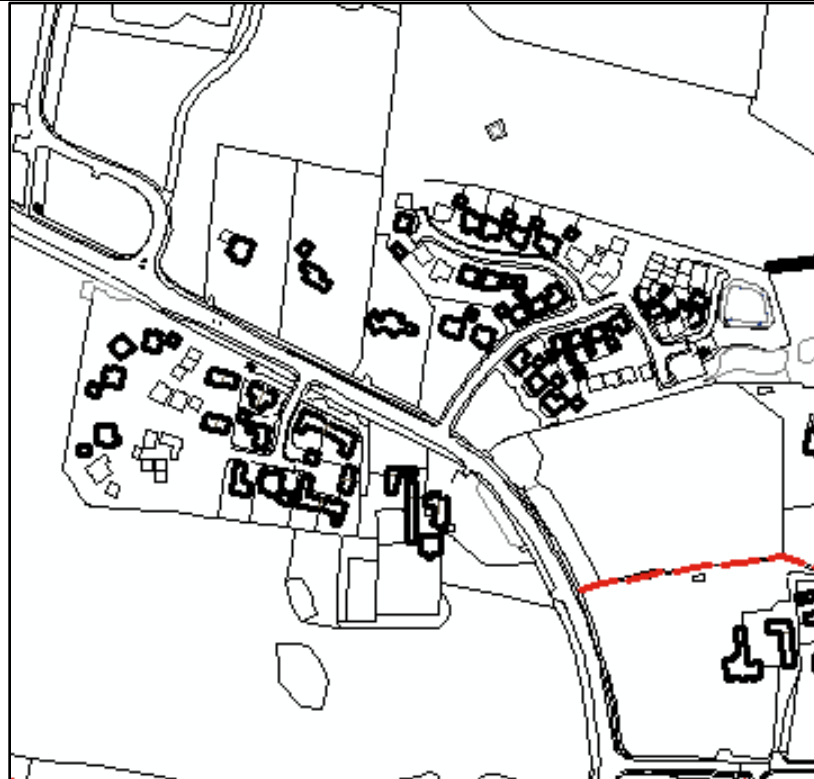
		<p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. 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> <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>Primary Care Contracts Manager</p>	<p>Housing</p>	<p>Any housing development will result in an increase in patient population and will have a direct impact on local GP services. Hence the CCG will be seeking s106 funding to increase clinical capacity in order to manage the impact.</p>
<p>Harborough District Council Council Offices Adam and Eve Street Market Harborough</p>	<p>Page 6</p> <p>Page 10: Section 3 2nd paragraph:</p> <p>Page 15: last</p>	<ul style="list-style-type: none"> • Para re: NEW POLICY GG15 – reference should be to Figure 9. • 'High resolution versions of all the maps are available in the Supporting Information': Should specify where these are as not clear as to where they can be found. • 2nd para: Quote from NPPF para 183 no longer correct – See NPPF para 29 and amended wording. • 4th paragraph – would be useful to have appropriate Appendices identified in respect of Statement of Consultation and Statement of Compliance with the Basic Conditions. <p>Would be helpful to specify which appendix the supporting information is in.</p>

	<p>paragraph</p> <p>Page 23: 2nd para</p> <p>Policy GG1</p> <p>Page 24: Final sentence</p> <p>Policy GG2</p>	<p>The residual requirement identified in the Proposed Submission Local Plan was 35 - there is no residual requirement figure for GG in the final Local Plan in light of the level of commitments/completions.</p> <p>Should reference Figure 2 rather than SHLAA reference.</p> <p>The Harborough Local Plan 2011-2031 does not define limits to development for any settlements, including Great Glen. This is already acknowledged on page 5 – Housing – NEW POLICY GG2.</p> <p>Figure 3 identifies the proposed new Settlement Boundary. Taking into account the methodology in the supporting text it appears that some areas which have been excluded should be considered for inclusion within the Settlement Boundary as it may not be appropriate to treat them as 'open countryside'.</p> <p>The areas concerned are shown on the map below as blue boxes and corresponding numbers:</p>
--	---	--

Figure 3 - Settlement Boundary



Area 1: A portion of the Davidsons development has been excluded from the Settlement Boundary (smaller square). The properties excluded from the Settlement Boundary on May Close are part of the wider development and are demarked from the wider countryside by the gardens boundary treatments. Likewise (larger square) several properties along London Rd which again are demarked from the surrounding countryside by hedges/fencing etc and form part of the settlement have been excluded. Perhaps these properties and associated residential curtilages should also be included within the Settlement Boundary - Nos 31-35 London Road and 26-34 London Road (see recent base mapping below as reflected in Figure 2 of NP on p. 24).



Area 2: No 24 London Rd and its residential curtilage have been excluded but are adjacent to the Settlement Boundary. The Boundary excludes part of the gardens of Nos 1-5 The Nook despite there being no physical demarcation within the garden and the land being residential curtilage (see map below).

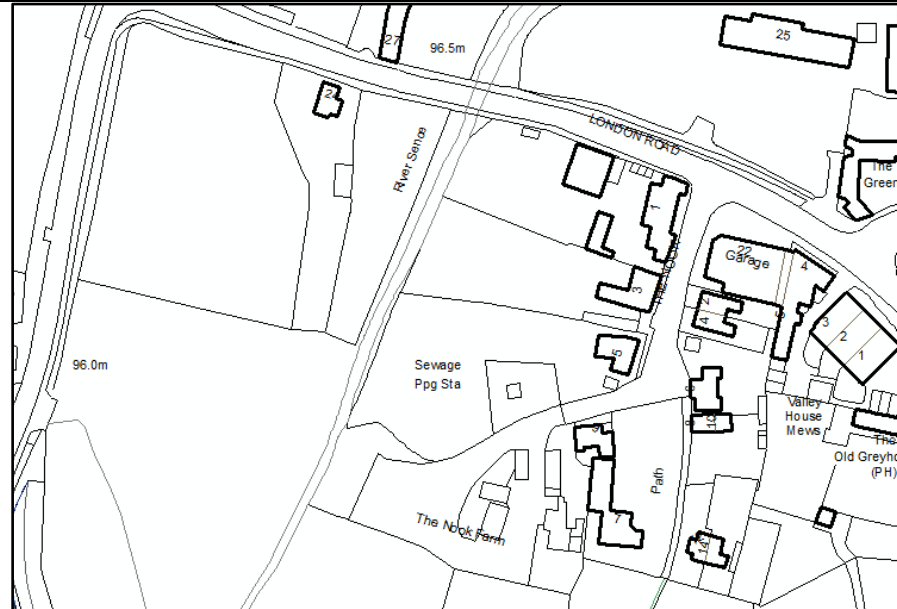
Policies
GG2/GG3

Page 28: 8.2.5

Page 43: 3rd
paragraph

Policy GG13

Figure 7
Figure 8/Policy
GG14



Policy GG2 identifies land outside of the Settlement Boundary as 'open countryside' and lists appropriate development in this instance, in referring specifically to housing this specifically allows for affordable housing through a rural exception site or for the provision of rural tourism and agriculture. However, in referring to housing policy *GG3 Housing provision windfall sites*, GG3a) allows for housing outside settlement limits eg if the development comprises a restricted gap in the continuity of frontage buildings or where the site is closely surrounded by buildings. In these circumstances there would be conflict between the two policies, GG2 allows for very specific housing types, GG3 is less specific, perhaps the interaction between the two policies or wording within GG3a) should be re-considered.

2nd para should refer to Appendix 3a.

Refers to *'the 47 sites identified'*. Does this refer the number of sites in the previous NP inventory as there are more than 47 in the updated inventory?

Missing bracket from first sentence.

Missing inventory number 153.

Existing OSSR site 'St Cuthbert's C of E School playing field' shows different boundary to that which is shown in Local Plan (see below).



Page 52: Bats
Policy GG15

Page 59

Reference at end of paragraph should be to Figure 10.

Page 62

First sentence should refer to wildlife corridors as shown in Figure 9. Second part of GG15.2 (*Development proposals that affect a site of ecological value will be expected to conserve and enhance its significant features, species and habitats, and to apply the hierarchy of avoid, mitigate and compensate*) should be a separate part of the policy as it does not just apply to that specific wildlife corridor.

Page 70:

- 2nd para - 'Local opinion is very strongly that this location.....' – Missing word?
- 3rd para – 'The full appeal decision is contained in the supporting information.' Appendix 3 should be specified as it is not clear where it can be found.

1st paragraph - References to NPPF refer to 2012 version and should be changed to reflect 2019 version.

Final sentence – Update: the final Leicester and Leicestershire Strategic Growth Plan has now been approved.

<p>Gladman Developments Ltd</p>	<p>https://www.llstrategicgrowthplan.org.uk/</p> <p>This letter provides the response of Gladman Developments (hereafter referred to as “Gladman”) to the current consultation held by Harborough District Council (HDC) in response to the submission version of the Great Glen Neighbourhood Plan Review (GGNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy.</p> <p>Legal Requirements</p> <p>Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the GGNP must meet are as follows:</p> <p><i>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</i></p> <p><i>(d) The making of the order contributes to the achievement of sustainable development.</i></p> <p><i>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</i></p> <p><i>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.</i></p> <p><i>(g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017</i></p> <p>National Planning Policy Framework and Planning Practice Guidance</p> <p>On the 24th July 2018, the Ministry of Housing, Communities and Local Government published the revised National Planning Policy Framework (NPPF/the Framework). The first revision since 2012, it implemented 85 reforms announced through the Housing White Paper. This version of the NPPF was itself superseded on the 19th February 2019, with the latest version, largely only making alterations to the Government’s approach for the Appropriate Assessment as set out in Paragraph 177 of the NPPF.</p> <p>Paragraph 214 of the 2019 NPPF sets out the transitional arrangements for the implementation of revised national planning policy. Paragraph 214 confirms that development plan documents submitted on or after the 24th January 2019 will be examined against the latest version of the NPPF. Given that the GGNP was submitted for Examination after this date, the comments provided within this representation reflect the national policy requirements as set out in the NPPF2019.</p> <p>The NPPF (2019) sets out the Government’s planning policies for England and how these are expected to be applied. In doing so it sets out the requirements of the preparation of neighbourhood plans within which locally-prepared plans for housing and other development can be produced. Crucially, the changes to national policy reaffirms the Government’s commitment to ensuring up to date plans are in place which provide a positive vision for the areas which they are responsible for to address the housing, economic, social and environmental priorities to help shape future</p>
--	--

		<p>local communities for future generations. In particular, paragraph 13 states that: “The application of the presumption has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”</p> <p>Paragraph 14 further states that: “In situations where the presumption (at paragraph 11d) applies to applications involving the provision of housing, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits, provided all of the following apply:</p> <ol style="list-style-type: none"> a. The neighbourhood plan became part of the development plan two years or less before the date on which the decision is made; b. The neighbourhood plan contains policies and allocations to meet its identified housing requirement; c. The local planning authority has at least a three-year supply of deliverable housing sites (against its five-year supply requirement, including the appropriate buffer as set out in paragraph 73); and d. The local planning authority’s housing delivery was at least 45% of that required over the previous three years.” <p>The NPPF (2019) also sets out how neighbourhood planning provides local communities with the power to develop a shared vision for their area in order to shape, direct and help deliver sustainable development needed to meet identified housing needs. Neighbourhood plans should not promote less development than set out in Local Plans and should not seek to undermine those strategic policies. Where the strategic policy making authority identifies a housing requirement for a neighbourhood area, the neighbourhood plan should seek to meet this figure in full as a minimum. Where it is not possible for a housing requirement figure to be provided i.e. where a neighbourhood plan has progressed before the adoption of a Local Plan, then the neighbourhood planning body should request an indicative figure to plan for and consider the latest evidence of housing need, population of the neighbourhood area and the most recently available planning strategy of the local planning authority.</p> <p>In order to proceed to referendum, the neighbourhood plan will need to be tested through independent examination in order to demonstrate that they are compliant with the basic conditions and other legal requirements before they can come into force. If the Examiner identifies that the neighbourhood plan does not meet the basic conditions as submitted, the plan may not be able to proceed to referendum.</p>
--	--	---

	<p>Planning Practice Guidance Following the publication of the NPPF (2018), the Government published updates to its Planning Practice Guidance (PPG) on 13th September 2018 with further updates being made in the intervening period. The updated PPG provides further clarity on how specific elements of the Framework should be interpreted when preparing neighbourhood plans.</p> <p>Although a draft neighbourhood plan must be in general conformity with the strategic policies of the adopted development plan, it is important for the neighbourhood plan to provide flexibility and consider the reasoning and evidence informing the emerging Local Plan which will be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested against. For example, the neighbourhood planning body should take into consideration up-to-date housing needs evidence as this will be relevant to the question of whether a housing supply policy in a neighbourhood plan contributes to the achievement of sustainable development. Where a neighbourhood plan is being brought forward before an up-to-date Local Plan is in place, the qualifying body and local planning authority should discuss and aim to agree the relationship between the policies in the emerging Neighbourhood Plan, the emerging Local Plan and the adopted Development Plan (Footnote 1). This should be undertaken through a positive and proactive approach working collaboratively and based on shared evidence in order to minimise any potential conflicts which can arise and ensure that policies contained in the neighbourhood plan are not ultimately overridden by a new Local Plan. (footnote 1 PPG Reference ID: 41-009-20160211)</p> <p>It is important the neighbourhood plan sets out a positive approach to development in their area by working in partnership with local planning authorities, landowners and developers to identify their housing need figure and identifying sufficient land to meet this requirement as a minimum. Furthermore, it is important that policies contained in the neighbourhood plan do not seek to prevent or stifle the ability of sustainable growth opportunities from coming forward.</p> <p>Relationship to Local Plans To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan. The adopted Development Plan relevant to the preparation of the GGNP, and the Development Plan which the GGNP will be tested against is the Harborough Local Plan (HLP). This document was adopted by Full Council on 30th April 2019 and sets out the vision, objectives and overarching spatial strategy to guide development in Harborough to 2031. The Local Plan replaces the Council's Core Strategy and Saved Policies from the previous 2001 Local Plan.</p> <p>Given that the Local Plan is subject to a review to consider the need to accommodate the wider housing market area's housing need, it is important that policies in the GGNP allow for flexibility so that they are able to respond positively to changes in circumstance which might arise over the plan period. This degree of flexibility is required to ensure that the GGNP is capable of being effective over the duration of its plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004, which states that:</p>
--	---

		<p>‘if to any extent, a policy contained in a development plan for an area conflicts with another policy in the development plan the conflict must be resolved in favour of the policy which is contained in the last document to be adopted, approached, or published (as the case may be).’</p> <p><u>Great Glen Neighbourhood Plan</u></p> <p>This section highlights the key issues that Gladman would like to raise with regards to the content of the GGNP as currently proposed. Gladman consider that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend modifications to the Plan that should be explored through the examination process.</p> <p>Policy GG1</p> <p><u>Policy GG1: Residential Site Allocation</u> The above policy seeks to allocate land for residential development for around 10 dwellings at land north of Glen House. In principle, Gladman support the allocation of the above site but we would question whether this will be sufficient to meet the housing needs of the Parish and would question whether the Parish Council has engaged with the local planning authority to request a housing requirement figure given that the adopted Local Plan is subject to a Local Plan Review to take account of the housing needs in the wider housing market area. As such, the Plan may not be enabling the level of development required to meet housing needs and a flexible approach to future sustainable growth opportunities will need to be included within the Plan. The need for further flexibility is discussed in greater detail in response to Policy GG2 below.</p> <p>Policy GG2</p> <p><u>Policy GG2: Settlement boundary</u> The above policy states development proposals will be supported within the settlement boundary as identified in figure 3. Land outside of the defined settlement boundary will be treated as countryside and development will only be allowed in a narrow set of circumstances for the provision of agriculture, affordable housing or formal recreation or sport use.</p> <p>Gladman object to the use of ‘countryside’ policies which seek to protect the countryside for the sake of its intrinsic character. Such an approach would appear to be based on the old PPS7 approach to countryside protection, which took a restrictive stance to development in rural areas and only permitted certain types of development. The Framework is clear that development which is sustainable should go ahead without delay in accordance with the presumption in favour of sustainable development. In reality, the use of development limits or frameworks such as this creates a ‘presumption against development’ in all areas beyond an arbitrary line which will act to confine the physical growth of the settlement and would be counter intuitive to the positive and flexible approach to growth contained in the adopted Development Plan. As such, the above policy is not in accordance with the requirements of national policy and therefore in conflict with basic conditions (a), (d) and (e).</p> <p>Accordingly, Gladman consider that the above policy should be modified to allow for flexibility and it is considered that the GGNP would be better served by a criteria-based approach consistent with the requirements of national policy and the following wording is put forward for consideration:</p>
--	--	--

		<p>In principle, Gladman support the inclusion of the above policy which seeks to provide a mixture of housing types to meet the needs of the local community. It states that priority should be given to smaller family homes of 3 bedrooms or less and that there will be a presumption against homes with more than 4 bedrooms.</p> <p>It is important to note that housing mix will inevitably change over a period of time and this policy should seek to secure a greater degree of flexibility going forward. Gladman do not consider that the presumption against homes of more than 4 bedrooms is positively prepared or justified. Gladman recommend that this element of the policy is deleted as it is not in accordance with basic conditions (a) and (d). As housing mix can change over time, there is a real risk that this policy will become outdated as new evidence of local need comes to light and the neighbourhood plan should contain suitable measures (i.e. if up-to-date evidence is provided) so that it can respond positively to changes in circumstance which may occur over the plan period.</p> <p><u>Policy GG6: Design Quality</u> The above policy relates to the design qualities which development proposals are expected to adhere to. There will not be a 'one size fits all' solution in relation to design standards and sites should be considered on a site by site basis with consideration given to the various relevant design principles. It is noted that the policy states that development proposals should be designed in accordance with the Great Glen Village Design Statement (VDS). Similar to the concerns raised in response to SPDs, Gladman consider that the policy is modified so that development proposals have 'regard' to the VDS as opposed to being in strict conformity with a document that has not been subject to the rigours of independent examination.</p> <p><u>Policy GG7: Local heritage assets of historical and architectural interest</u> The above policy identifies a number of buildings and structures of local heritage interest which are non-designated heritage assets. Gladman are concerned that this policy does not have full regard to the requirements of national policy. The policy must be reworded to reflect the guidance set out within paragraph 197 of the Framework which states:</p> <p style="text-align: center;"><u>“The effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgment will be required having regard to the scale of any harm or loss and the significance of the heritage asset.” (emphasis added)</u></p> <p><u>Policy GG11: Assets of community value</u> Whilst recognising the importance of local community assets, Gladman do not consider that this policy should be included within the main body of the GGNP given that it does not actually identify and designate any Assets of Community Value. Accordingly, this is considered more akin to an aspirational policy at this moment in time and should be included in section 10 of the Neighbourhood Plan.</p> <p><u>Policy GG12: Designation of Local Green Spaces</u></p>
--	--	---

		<p>Policy GG12 seeks to designate a number of parcels of land as Local Green Space (LGS). In order to designate land as LGS the GGNP must be supported by proportionate robust evidence that demonstrates how each of the designations meets the national policy requirements set out in Paragraphs 99 and 100 of the Framework.</p> <p>The requirements of the Framework are supplemented by PPG (Footnote 2), which states that <i>‘Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used in a way that undermines this aim of plan making.’</i></p> <p>Further, upon reviewing the scale of a number of sites, these could be considered as extensive tracts of land. The issue regarding what constitutes an extensive tract of land has been previously explored in numerous Neighbourhood Plan Examinations for both emerging and made Neighbourhood Plans, the following Examiner’s Reports are of particular importance:</p> <ul style="list-style-type: none"> - The Examiner’s Report to the Sedlescombe Neighbourhood Plan recommended the deletion of LGS measuring approximately 4.5ha as this constituted an extensive tract of land. - The Examiner’s Report to the Oakley and Deane Neighbourhood Plan recommended the deletion of LGS measuring approximately 5ha and also found it to be not local in character. - The Examiner’s Report to the Alrewas Neighbourhood Plan identified that both sites proposed for LGS designation ‘in relation to the overall size of Alrewas village’ comprised of extensive tracts of land measuring approximately 2.4ha and 3.7ha. - The Examiner’s Report to the Brixworth Neighbourhood Plan recommended the deletion of three proposed LGS due to the lack of evidence supporting their designation. In doing so, the Examiner recommended the deletion of 1 LGS measuring approximately 2.7ha. <p>Gladman do not consider that a number of LGS identified are capable of meeting the three tests required for their allocation and should be deleted from Policy GG12. (Footnote 2: Paragraph: 007 Reference ID: 37-007-20140306)</p> <p>Policy GG14: <u>Important Open Spaces</u> Gladman recognise the importance of securing open space to meet the needs of the local community. However, the first paragraph of the policy states that the Parish Council will actively work with the District Council and other stakeholders to bring the ratio of ‘area of open space to population size’ in Great Glen to recognised standards. This is an aspirational statement and it is unclear how a decision maker would apply this policy through the decision-making process in a clear and consistent manner contrary to the requirements of national policy. It is recommended that this statement is removed from the policy wording and is instead included in the supporting text.</p> <p>Policy GG19: <u>Important views and skylines</u> The above policy requires development proposals to consider, assess and address, with mitigation where appropriate,</p>
--	--	--

	Policy GG21	<p>their impact on the important views identified under the above policy.</p> <p>As set out in case law, for a view to be identified for protection there should be a demonstrable physical attribute that elevates its importance out of the ordinary, rather than seeking to protect views of the open countryside due its pleasant sense of place.</p> <p>Gladman are concerned that the proposed policy will seek to prejudice the delivery of potential sustainable development opportunities from coming forward. The emphasis of this policy is very much on the 'protection' of the landscape/views identified rather than seeking to integrate new sustainable development opportunities within the existing landscape and character of the local area. Opinions on landscape are highly subjective and without robust evidence to demonstrate why these areas are considered beyond the fact that they are considered valued by local community members will likely lead to conflicting decisions through the development management process.</p> <p><u>Policy GG21: Residential parking</u> The above policy requires all new development proposals to incorporate off-road parking and dwellings with up to 3 bedrooms will be required to provide 2 off-road parking spaces and dwellings which include four bedrooms or more will be required to provide 3 off road parking spaces. Whilst Gladman acknowledge the need to incorporate parking provision within development proposals it is unclear from the information provided why this policy requirement is being pursued as it is not supported by any proportionate or robust evidence. This policy is therefore considered too prescriptive as it may not allow for the most appropriate layout of schemes. In any event, this matter will be considered through the determination of development proposals through the decision-making process on the advice of the county council's highways team. Gladman recommend that the specific numbers relating to parking provision is deleted from the policy wording.</p> <p>Conclusions Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However, it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the GGNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area. Gladman consider that further modifications to the Plan and additional housing allocations are required to ensure that it allows for sufficient flexibility and so that it is conformity with basic conditions.</p> <p>Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.</p>
Natural England		<p>Great Glen Neighbourhood Plan - Review</p> <p>Thank you for your consultation on the above dated 29 May 2019.</p> <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is</p>

	<p>conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan.</p> <p>Annex 1 - Neighbourhood planning and the natural environment: information, issues and opportunities Natural environment information sources</p> <p>The Magic1 website will provide you with much of the nationally held natural environment data for your plan area. The most relevant layers for you to consider are: Agricultural Land Classification, Ancient Woodland, Areas of Outstanding Natural Beauty, Local Nature Reserves, National Parks (England), National Trails, Priority Habitat Inventory, public rights of way (on the Ordnance Survey base map) and Sites of Special Scientific Interest (including their impact risk zones). Local environmental record centres may hold a range of additional information on the natural environment. A list of local record centres is available here2.</p> <p>Priority habitats are those habitats of particular importance for nature conservation, and the list of them can be found here3. Most of these will be mapped either as Sites of Special Scientific Interest, on the Magic website or as Local Wildlife Sites. Your local planning authority should be able to supply you with the locations of Local Wildlife Sites.</p> <p>National Character Areas (NCAs) divide England into 159 distinct natural areas. Each character area is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. NCA profiles contain descriptions of the area and statements of environmental opportunity, which may be useful to inform proposals in your plan. NCA information can be found here4.</p> <p>There may also be a local landscape character assessment covering your area. This is a tool to help understand the character and local distinctiveness of the landscape and identify the features that give it a sense of place. It can help to inform, plan and manage change in the area. Your local planning authority should be able to help you access these if you can't find them online.</p> <p>If your neighbourhood planning area is within or adjacent to a National Park or Area of Outstanding Natural Beauty (AONB), the relevant National Park/AONB Management Plan for the area will set out useful information about the protected landscape. You can access the plans on from the relevant National Park Authority or Area of Outstanding</p>
--	--

	<p>Natural Beauty website.</p> <p>General mapped information on soil types and Agricultural Land Classification is available (under 'landscape') on the Magic5 website and also from the LandIS website6, which contains more information about obtaining soil data.</p> <p>Natural environment issues to consider</p> <p>The National Planning Policy Framework7 sets out national planning policy on protecting and enhancing the natural environment. Planning Practice Guidance8 sets out supporting guidance.</p> <p>Your local planning authority should be able to provide you with further advice on the potential impacts of your plan or order on the natural environment and the need for any environmental assessments.</p> <p><u>Landscape</u></p> <p>Your plans or orders may present opportunities to protect and enhance locally valued landscapes. You may want to consider identifying distinctive local landscape features or characteristics such as ponds, woodland or dry stone walls and think about how any new development proposals can respect and enhance local landscape character and distinctiveness.</p> <p>If you are proposing development within or close to a protected landscape (National Park or Area of Outstanding Natural Beauty) or other sensitive location, we recommend that you carry out a landscape assessment of the proposal. Landscape assessments can help you to choose the most appropriate sites for development and help to avoid or minimise impacts of development on the landscape through careful siting, design and landscaping.</p> <p><u>Wildlife habitats</u></p> <p>Some proposals can have adverse impacts on designated wildlife sites or other priority habitats (listed here9), such as Sites of Special Scientific Interest or Ancient woodland10. If there are likely to be any adverse impacts you'll need to think about how such impacts can be avoided, mitigated or, as a last resort, compensated for.</p> <p><u>Priority and protected species</u></p> <p>You'll also want to consider whether any proposals might affect priority species (listed here11) or protected species. To help you do this, Natural England has produced advice here12 to help understand the impact of particular developments on protected species.</p> <p><u>Best and Most Versatile Agricultural Land</u></p> <p>Soil is a finite resource that fulfils many important functions and services for society. It is a growing medium for food, timber and other crops, a store for carbon and water, a reservoir of biodiversity and a buffer against pollution. If you are proposing development, you should seek to use areas of poorer quality agricultural land in preference to that of a higher quality in line with National Planning Policy Framework para 112. For more information, see our publication</p>
--	--

Agricultural Land Classification: protecting the best and most versatile agricultural land¹³.

Improving your natural environment

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

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

You may also want to consider enhancing your local area in other ways, for example by:

- Setting out in your plan how you would like to implement elements of a wider Green Infrastructure Strategy (if one exists) in your community.
- Assessing needs for accessible greenspace and setting out proposals to address any deficiencies or enhance provision.
- Identifying green areas of particular importance for special protection through Local Green Space designation (see Planning Practice Guidance on this¹⁴).
- Managing existing (and new) public spaces to be more wildlife friendly (e.g. by sowing wild flower strips in less used parts of parks, changing hedge cutting timings and frequency).
- Planting additional street trees.
- Identifying any improvements to the existing public right of way network, e.g. cutting back hedges, improving the surface, clearing litter or installing kissing gates) or extending the network to create missing links.
- Restoring neglected environmental features (e.g. coppicing a prominent hedge that is in poor condition, or clearing away an eyesore).

1 <http://magic.defra.gov.uk/>

2 <http://www.nbn-nfbr.org.uk/nfbr.php>

3

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

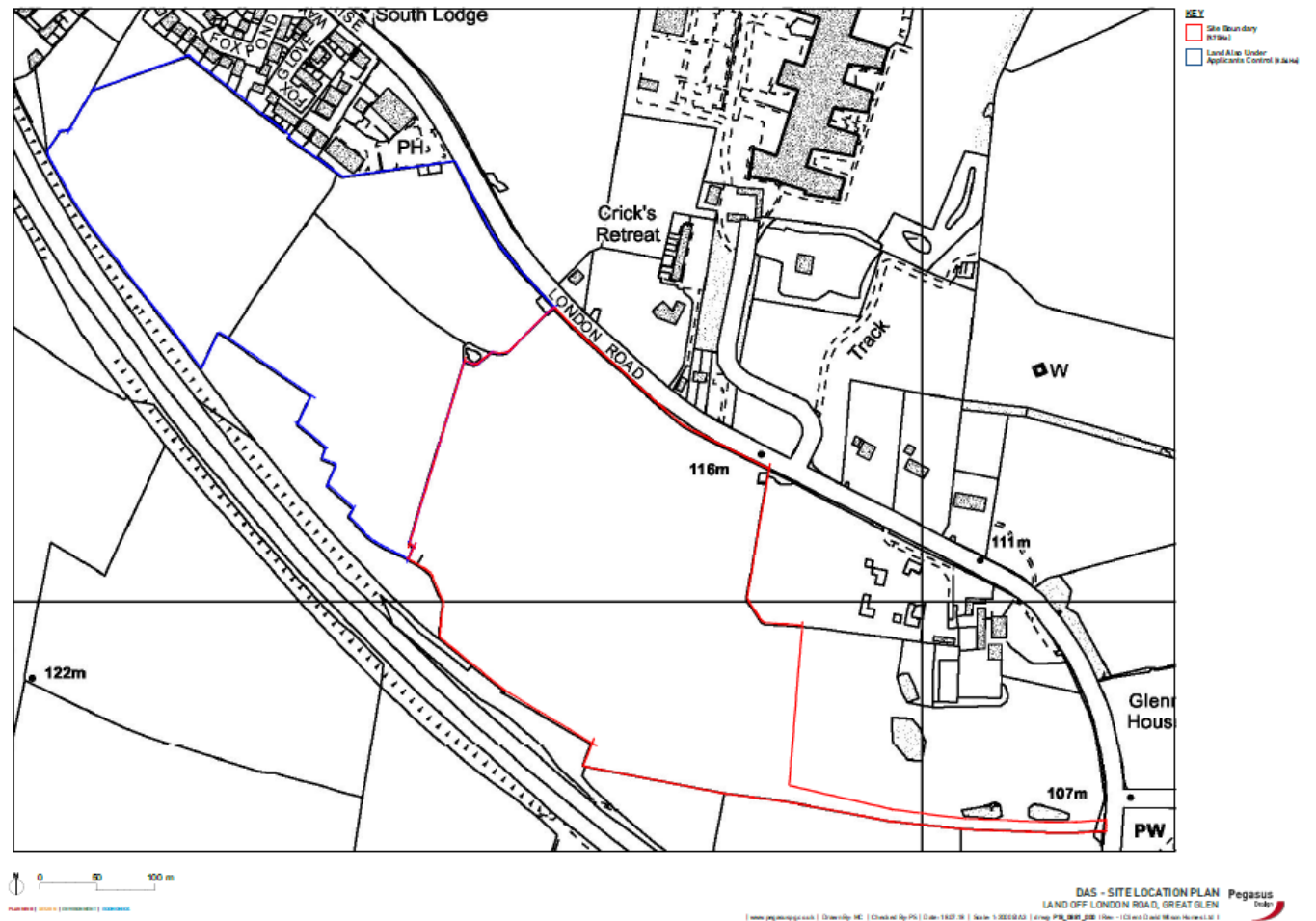
4 <https://www.gov.uk/government/publications/national-character-area-profiles-data-for-local-decision-making>

5 <http://magic.defra.gov.uk/>

		<p>6 http://www.landis.org.uk/index.cfm</p> <p>7 https://www.gov.uk/government/publications/national-planning-policy-framework--2</p> <p>8 http://planningguidance.planningportal.gov.uk/blog/guidance/natural-environment/</p> <p>9</p> <p>http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</p> <p>10 https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</p> <p>11</p> <p>http://webarchive.nationalarchives.gov.uk/20140711133551/http://www.naturalengland.org.uk/ourwork/conservation/biodiversity/protectandmanage/habsandspeciesimportance.aspx</p> <p>12 https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals</p> <p>13 http://publications.naturalengland.org.uk/publication/35012</p> <p>14 http://planningguidance.planningportal.gov.uk/blog/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space/local-green-space-designation/</p>
Pegasus Group	Section 5	<p>This submission has been prepared by Pegasus Group on behalf of David Wilson Homes, who have land interests south of London Road, Great Glen. It is considered that the changes proposed to the 'made' Neighbourhood Plan amount to material modifications, which are so significant and substantial as to change the nature of the neighbourhood plan, and thus a detailed examination process is required, followed by a referendum, pursuant to Schedule A2 of the Planning and Compulsory Purchase Act 2004 (as amended).</p> <p>The National Planning Practice Guidance (PPG) confirms that there are three types of modification which can be made to an adopted Neighbourhood Plan, and the process is dependent on the degree of change which the modification involves; minor (non-material) modifications which would not materially affect the policies in the plan, material modifications which do not change the nature of the plan, which would require examination but not a referendum, and material modifications that do change the nature of the plan, and which would therefore require examination and a referendum. Great Glen Parish Council acknowledges that the proposed changes are material, however they consider that a referendum is not required. This position is set out within the May 2019 document 'Consideration of Minor (non-material)/Major (material) updates to the Made Great Glen Neighbourhood Plan' which notes that the 'Advisory Committee took the view that the changes were material, not requiring a referendum'.</p> <p>The PPG confirms that where material modifications do change the nature of the plan, the local planning authority should publicise and consider the examiner's report in line with the procedure for making a new Neighbourhood Plan. In accordance with paragraph 10(1) of Schedule A2 of the Planning and Compulsory Purchase Act 2004 (as amended), the Examiner must determine whether the modifications contained in the draft Neighbourhood Plan 'are so significant or substantial as to change the nature of the neighbourhood development plan which the draft plan would replace'. It is our submission that the proposed changes to the adopted Neighbourhood Plan do change the nature of the Great Glen Neighbourhood Plan and would therefore require the Neighbourhood Plan Review to proceed to an examination and referendum.</p>

	Policy GG13	<p>When compared with the 'made' Neighbourhood Plan, the Submission Version Neighbourhood Plan proposes a new residential allocation north of Glen House (for around 10 dwellings) at Policy GG1. Policy GG2 updates the settlement boundary to take account of recent planning permissions, the north of Great Glen allocation and business developments. The ridge and furrow map has been amended to include large additional areas of ridge and furrow across the wider area (Policy GG13), and Policy GG17 is a new policy that requires development proposals to respect historic features.</p> <p>Policies GG13 and GG17 are considered to be material changes as they would directly impact on any future development of the site south of London Road, controlled by David Wilson Homes, and whilst GG13 was included in the 'made' Neighbourhood Plan, the review seeks to include new areas of land, including that under the control of David Wilson Homes, and Policy GG17 is a new policy altogether.</p> <p>Whilst it is considered that some of the modifications proposed by the Neighbourhood Plan Review do not constitute material modifications individually, when each of the proposed modifications are assessed in combination with the other modifications, it is considered that the overall changes constitute matters that are significant and substantial, and therefore do change the nature of the plan. An examination and referendum are therefore required.</p> <p>The Neighbourhood Plan Review seeks to amend Policy GG13 Ridge and Furrow to include additional areas of ridge and furrow across the wider neighbourhood planning area, when compared to the adopted Neighbourhood Plan. Policy GG13 seeks to preserve identified areas of well-preserved ridge and furrow, as shown at Figure 7.</p> <p>Pegasus Group act on behalf of David Wilson Homes in relation to their land interests at London Road, Great Glen. The site controlled by David Wilson Homes forms part of a large area of ridge and furrow that is identified in the Submission Version of the Neighbourhood Plan (reference 075 of Figure 7). A Site Location Plan is included at Appendix 1.</p> <p>These representations are accompanied by a Review of Proposed Protection of Ridge and Furrow Report, by Ecus Environmental Consultations (Appendix 2). This report provides a summary of the heritage significance of the ridge and furrow, in order to assess potential impact and harm to both the asset itself and any contribution to the setting of other heritage assets, in accordance with Section 16 of the National Planning Policy Framework (the Framework).</p> <p>The report considers that as the site at London Road does not contribute to the setting of any designated heritage asset, its loss through development cannot, in principle, be harmful. Given the proposed landscaping measures that would be incorporated into any future residential development proposals on the land controlled by David Wilson Homes, it is not considered that the principle of residential development would pose any harm.</p> <p>The remaining issue is whether the loss of ridge and furrow, as a non-designated heritage asset, is sufficiently adverse as to justify its preservation within the emerging Neighbourhood Plan. Ridge and furrow earthworks are the most</p>
--	-------------	---

	Policy GG17	<p>common relict of our medieval past throughout the country; the best examples of which are scheduled. This is primarily where the ridge and furrow is particularly well-preserved and in proximity to settlement remains, such as shrunken medieval village remains often showing signs of village planning in the Black Death period. The ridge and furrow earthworks in Great Glen form less than 10% of the former field system, and therefore their resulting interest is slight, and they therefore only just fall within the category of non-designated heritage assets of local importance.</p> <p>Nevertheless, David Wilson Homes propose to retain some of the more visual elements of the ridge and furrow within any future masterplan for the site, as public open space, this would preserve any significance. This would reduce the overall impact from substantial harm (total loss) to less than substantial harm, for the purposes of the planning balance. Furthermore, given their assessed local importance, the magnitude of harm can be further quantified as being closer to the threshold than borderline with substantial.</p> <p>Furthermore, prior to the production of this Neighbourhood Plan, the sites identified at Figure 7 have been characterised and assessed, and have not been considered to be of sufficient importance to warrant protection.</p> <p>Policy GG17 Historic Landscape Character Area requires development proposals in the southwestern part of Great Glen to respect the historic features identified at Figure 12. This policy requires any loss or damage arising from a development proposal to be avoided, and the benefits of such development to be balanced against the significance of the landscape character area's features, tranquillity and scenic values, and as the setting for the Grade II Listed St Cuthbert's Church.</p> <p>The Ecus Environmental Report (Appendix 2) considers the heritage assets in proximity to the David Wilson Homes site. The report concludes that the site is not considered to contribute to the immediate landscape setting of the Church of St Cuthbert. Policy GG17 also refers to ridge and furrow, which is discussed in detail under Policy GG13 above and within Appendix 2.</p> <p>It is our submission that the wording of Policy GG17 be amended to reflect paragraphs 193 - 197 of the Framework in order to meet the 'basic conditions', as required. Any future residential development of the site south of London Road can be designed sensitively to ensure that there is no harm to identified heritage assets.</p> <p><u>Appendix 1: Site Location Plan</u></p>
--	-------------	--



Appendix 2: Review of Ridge and Furrow Report (ECUS) (Full representation with Appendix 2 sent as separate document)