

The Kibworths 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
Anglian Water	<p>Policy H7: Building Design Principles</p> <p>Policy ENV 1: Protection of Local Green Spaces</p>	<p>Policy H7: Building Design Principles Anglian Water welcomes the reference made to the inclusion of Sustainable Drainage Systems (SuDs) as part of new development. We support the use of SUDs to reduce risk of surface water and sewer flooding.</p> <p>Policy ENV 1: Protection of Local Green Spaces Anglian Water owns part of the area designated as local green space at Church Road (area 096). The area of land in our ownership includes an existing balancing pond. There also existing surface water and combined sewers which cross the land designated as local green spaces including the land in Anglian Water's ownership. These assets are critical to enable us to carry out Anglian Water's duty as statutory undertaker.</p> <p>It is noted that Policy ENV 1 has been amended to refer to safeguarding utility infrastructure in the ownership of Anglian Water as an exception from the restrictions for development within the designated local green spaces in response to comments made by Anglian Water. However it is unclear whether policy ENV 1 as drafted would allow Anglian Water to undertake development required to meet our statutory and/or corporate obligations.</p> <p>It is therefore suggested the policy should be amended as follows:</p> <p>'Within the areas of Local Green Space identified on the Proposals Map and in Figure 7 below, development is ruled out, other than in very special circumstances, including safeguarding the development of utility infrastructure provided by Anglian Water.'</p>

	<p>Policy ENV10: Sustainable Development</p> <p>Policy ENV11: Watercourses and flooding</p>	<p>Policy ENV10: Sustainable Development</p> <p>Reference is made to development proposals being viewed positively where they have addressed sustainable drainage which is welcomed. The supporting text of this policy cross also refers to the requirements of Policy ENV11. Please see comments below relating to Policy ENV 11.</p> <p>Policy ENV11: Watercourses and flooding</p> <p>Anglian Water welcomes the reference made to the inclusion of Sustainable Drainage Systems (SuDs) as part of new development. We support the use of SUDs to reduce risk of surface water and sewer flooding.</p>
Great Glen Parish Council	General Comment	“Congratulations on a comprehensive Neighbourhood Plan setting out a vision for the future heritage and vision that will produce a vibrant and healthy community in line with the National Planning Policy Framework. “
Harborough District Council Officers	<p>General comment</p> <p>Policies SD1 and SD2</p> <p>Page 36</p> <p>Policy SD3</p> <p>Policy CSA1</p> <p>Policy CSA3</p> <p>Policy CSA6</p>	<p>The Plan is very long and it is page 35 before the first policy. As a document for determining planning applications it would be useful for the preamble and background information to be moved to an appendix. Similarly the community actions could be moved to an appendix. A simpler Plan would be easier to use.</p> <p>Policies SD1 and SD2 – can these be merged? Policy SD2 isn’t really a policy as such.</p> <p>Page 36 – top of page – limits come from the 2001 Local Plan, not the adopted Core Strategy Figure 2, page 36 – needs to be much larger to be useable</p> <p>Policy SD3 – there is no definition of ‘multifunctional facilities’</p> <p>Policy CSA1 – officers are unsure whether this policy is a planning or land based policy. Criteria b) is not a practical criteria.</p> <p>Policy CSA3 Club and Groups (multi-functional amenities)</p> <p>(a) states <i>‘Is within limits of development’</i> however policy SD3 states <i>‘new multi-functional facilities close or adj. to Limits of development.’</i></p> <p>It is noted that CSA4 is consistent with Policy SD3</p> <p>Policy CSA6 – formal parks need to be listed or shown on a plan</p>

	Policy H3	Policy H3 – consider whether the reference to Starter Homes should be removed
	Policy H4	Policy H4 – b) will be very difficult to enforce. Most people move in for a year for tax reasons before selling on, there is no way DM could ensure a self builder continues to live in the property once constructed or in the future.
	Policy H7	<p>Policy H7 – b) the 5% 3 storey house rule needs to apply to larger sites only, this can't apply to smaller sites for say less than 5 dwellings.</p> <p>Policy H7 – e) the sentence is not completed, and some justification is needed to demonstrate moving away from the normal LCC guidance. 4 off road spaces for a 4 bedroom dwelling is likely to be seen as excessive and not justified and has viability implications.</p> <p>Policy H7 – g) needs to be more precise and specific to what is being asked. How will the enhancements be made, and which ones? And 'where appropriate' is required after trees and hedges must be maintained.</p> <p>Policy H7 – k) this is not justified in all cases. We can only require SUDS for major developments of 10 dwellings and above and the policy should be changed to reflect this.</p> <p>Policy H7 – l) again, needs more justification. This will have viability implications and no evidence is presented in the text to justify it.</p>
	Policy H7	Policy H8 – this repeats H7 e) as above, and then quotes the existing LCC guidance. Suggest this should be moved to explanation instead.
	Policy H11	Policy H11 – Consideration should be given as to whether this is appropriate. The first line regarding compatibility with the Kibworth NP seems irrelevant.
	Policy ENV9	Policy ENV9 – Consideration whether more justification is needed. There is no explanation in the text as to the boundaries that have been drawn up.
	Policy E1	Policy E1 – This policy may be considered too restrictive. Should other town centre uses (A2, A3, even B1) be permitted in line with criteria b)?
	Employment – Section 6	Employment is a small part of the whole plan and the policies are generic; they do not appear to conflict with anything the 2nd draft of the Local Plan currently says. Home-working is perhaps a little over-played (200 residents from approx. 5500 isn't particularly high).

Highways England	Policy H1	<p>Highways England welcomes the opportunity to comment on the submission draft of Kibworth's Neighbourhood Plan which includes both Kibworth Beauchamp and Kibworth Harcourt Parish council areas and covers the period 2011-2031. It is noted that the document provides a vision for the future of the Parish of Kibworth 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 the role of Highways England to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Kibworth Neighbourhood Plan, Highways England's principal interest is safeguarding the operation of the M1 which routes approximately 11 miles west of the Neighbourhood Plan area.</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 Kibworth is required to be in conformity with the emerging Harborough Local Plan and this is acknowledged as a requirement within the document.</p> <p>Highways England has previously provided a response to the submission draft of the Kibworth Neighbourhood Plan in December 2016. It was noted that whilst no housing target had been confirmed for the area (and would not be until the Harborough Local Plan is adopted), it was expected that housing development in the Parish beyond that already committed, would be restricted to small-scale windfall development. This is because a significant number of dwellings have already been constructed or received planning permission between 2011 and 2016 (566 dwellings in total).</p> <p>Highways England notes that this position is retained in the current consultation document, with Policy H1: Housing Provision stating that further development in the Parish will be restricted to windfall development, unless there is a failure to deliver the existing commitments.</p> <p>Therefore Highways England considers that it is likely that there will be very limited development growth coming forward across the Parish and in this regard expects that there will be no impacts on the operation of the SRN.</p> <p>Highways England notes that, in the supporting Consultation Statement document, in the Contacting Stakeholders section, the Highways Agency is listed as a 'statutory or other stakeholder'. It should be noted that since April 2015, the Highways Agency became a government owned company under the new moniker of Highways England. It is therefore considered that the document should be updated in this regard.</p> <p>Highways England has no further comments to provide, and trusts the above is useful in the progression of the</p>
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		Kibworth Parish Neighbourhood Plan
Historic England		<p>Thank you for your email of 5 April 2017 consulting Historic England on The Kibworth Neighbourhood Plan.</p> <p>We responded to a consultation by the neighbourhood group on 21 December 2016, a copy of which is attached, and have no further comments to make.</p> <p><u>Response of 21 December 2016</u> Neighbourhood Plan for The Kibworths</p> <p>Thank you for consulting Historic England about your Neighbourhood Plan. Your Neighbourhood Plan falls within the boundary of the Kibworth Beauchamp and the Kibworth Harcourt Conservation Areas and includes a number of designated heritage assets including The Old House and Garden Walls, Kibworth Harcourt Mill, and the Church of St Wilfrid. It will be important that the strategy you put together for this area safeguards those elements which contribute to the importance of those historic assets. This will assist in ensuring they can be enjoyed by future generations of the area and make sure it is in line with national planning policy.</p> <p>The conservation officer at Harborough District Council is the best placed person to assist you in the development of your Neighbourhood Plan. They can help you to consider how the strategy might address the area's heritage assets. At this point we do not consider there is a need for Historic England to be involved in the development of the strategy for your area.</p> <p>If you have not already done so, we would recommend that you speak to the staff at Leicestershire County Council who look after the Historic Environment Record and give advice on archaeological matters. They should be able to provide details of not only any designated heritage assets but also locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk <http://www.heritagegateway.org.uk>). It may also be useful to involve local voluntary groups such as the local Civic Society, local history groups, building preservation trusts, etc., in the production of your Neighbourhood Plan.</p> <p>Your local authority might also be able to provide you with general support in the production of your Neighbourhood Plan. National Planning Practice Guidance is clear that where it is relevant, Neighbourhood Plans need to include enough information about local heritage to guide planning decisions and to put broader strategic heritage policies from the local authority's local plan into action at a neighbourhood scale. If appropriate this should include enough information about local non-designated heritage assets including sites of archaeological interest to guide decisions.</p> <p>Further information and guidance on how heritage can best be incorporated into Neighbourhood Plans has been produced by Historic England. This signposts a</p>

		<p>number of other documents which your community might find useful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:- http://www.historicengland.org.uk/advice/planning/plan-making/improve-yourneighbourhood/</p>
Leicestershire County Council		<p>Leicestershire County Council is supportive of the Neighbourhood plan process and welcome being included in this consultation.</p> <p>Highways General Comments 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.</p> <p>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 on larger developments, where there is a more realistic prospect of services being commercially viable once the contributions have stopped i.e. they would be able to operate without being supported from public funding.</p> <p>The current financial climate means that the CHA has extremely limited funding available to undertake minor highway improvements. Where there may be the prospect of third party funding to deliver a scheme, the County Council will still normally expect the scheme to comply with prevailing relevant national and local</p>

		<p>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.</p> <p>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.</p> <p>The LLFA is not able to:</p> <ul style="list-style-type: none"> • Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation. • Use existing flood risk to adjacent land to prevent development. • Require development to resolve existing flood risk. <p>When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points:</p> <ul style="list-style-type: none"> • Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)). • Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map). • Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding. • How potential SuDS features may be incorporated into the development to enhance the local amenity, water quality 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. <p>All development will be required to restrict the discharge and retain surface water on site in line with current government policies. This should be undertaken through the use of Sustainable Drainage Systems (SuDS). Appropriate space allocation for SuDS features should be included within development sites when considering the housing density to ensure that the potential site will not limit the ability for good SuDS design to be carried out. Consideration should also be given to blue green corridors and how they could be used to</p>
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		<p>improve the bio-diversity and amenity of new developments, including benefits to surrounding areas.</p> <p>Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing watercourses and land drainage (including watercourses that form the site boundary) are retained as open features along their original flow path, and are retained in public open space to ensure that access for maintenance can be achieved. This should also be considered when looking at housing densities within the plan to ensure that these features can be retained.</p> <p>LCC in our role as LLFA will object to anything contrary to LCC policies.</p> <p>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>Planning Developer Contributions 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 www.greatglen.leicestershireparishcouncils.org/uploads/175670305aeaf4865082307_4.pdf</p> <p>Mineral & Waste Planning 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.</p> <p>Although neighbourhood plans cannot include policies that cover minerals and waste development, it may be the case that your neighbourhood contains an existing or planned minerals or waste site. The County Council can provide information on these operations or any future development planned for your neighbourhood.</p> <p>You should also be aware of Mineral Consultation Areas, contained within the adopted Minerals Local Plan and Mineral and Waste Safeguarding proposed in the new 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</p>
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		<p>operations. The County Council can provide guidance on this if your neighbourhood plan is allocating development in these areas or if any proposed neighbourhood plan policies may impact on minerals and waste provision.</p> <p>Education Whereby housing allocations or preferred housing developments form part of a Neighbourhood Plan the Local Authority will look to the availability of school places within a two mile (primary) and three mile (secondary) distance from the development. If there are not sufficient places then a claim for Section 106 funding will be requested to provide those places.</p> <p>It is recognised that it may not always be possible or appropriate to extend a local school to meet the needs of a development, or the size of a development would yield a new school. However, in the changing educational landscape, the Council retains a statutory duty to ensure 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>Property Strategic Property Services No comment at this time.</p> <p>Adult Social Care 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>Environment No comment at this time.</p> <p>Communities Consideration of community facilities in the draft Plan would be welcomed. We would suggest where possible to include a review of community facilities, groups and allotments and their importance with your community. Consideration could also be given to policies that seek to protect and retain these existing facilities more generally, support the independent development of new facilities and relate to the protection of Assets of Community Value and provide support for any existing or future designations. The identification of potential community projects that could be progressed would be a positive initiative.</p> <p>Economic Development</p>
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		<p>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>Superfast Broadband High speed broadband is critical for businesses and for access to services, many of which are now online by default. Having a superfast broadband connection is no longer merely desirable, but is an essential requirement in ordinary daily life.</p> <p>All new developments (including community facilities) should have access to superfast broadband (of at least 30Mbps) Developers should take active steps to incorporate superfast broadband at the pre-planning 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>
Manor Oak Homes		<p>Representations to Kibworth Neighbourhood Plan Examination Version Consultation On behalf of Manor Oak Homes</p> <p>I am writing on behalf of Manor Oak Homes to make representations to the current Kibworths' Neighbourhood Plan Examination Version Consultation.</p> <p>Enclosed with this letter is a copy of the Examination Version Representation Form. This letter starts by providing a background to Manor Oak Homes' work in the Kibworths, before detailing their comments on the submitted Kibworth Neighbourhood Plan (KNP).</p> <p>Background</p> <p>Manor Oak Homes are currently promoting land to the west of the Kibworths (see plan enclosed as an Appendix) as a Strategic Development Area (SDA) in the emerging Harborough Local Plan for residential development, a new primary school and community uses to meet the Kibworths' need for sustainable development over the plan period. This land is not currently identified as a preferred option for the largescale growth needed in the district, but Manor Oak Homes have demonstrated the sustainability of land to the west of the Kibworths for development by securing planning permission on the three sites listed below, which also include provisions for extensive highways improvements in the local area as detailed:</p> <ul style="list-style-type: none"> • Land off Wistow Road, Kibworth Harcourt: Outline planning perm1ss1on (Ref: 14/01641/OUT) for the erection of up to 66 dwellings. Highways improvements include: <ul style="list-style-type: none"> o improvements to 2 nearest bus stops (including raised and dropped kerbs to allow level access)

		<p>to support modern bus fleets with low floor capabilities;</p> <ul style="list-style-type: none"> o contribution towards equipping the nearest bus stop(s) with Real Time Information (RTI) system; and o the conversion of the existing traffic island on Wistow Road to a pedestrian refuge crossing <ul style="list-style-type: none"> • Land to the south and west Of Priory Business Park, Wistow Road, Kibworth Harcourt: Outline planning permission (Ref: 16/00286/OUT) for up to 11,368m2 of commercial/industrial floorspace, up to 882m2 of office floorspace and up to 294m2 of retail floorspace. Highways improvements include: <ul style="list-style-type: none"> o extending the existing footway on the south side of Wistow Road between the existing business park and Wistow Rd / Warwick Rd roundabout to connect to the proposed development. o improvements to the Wistow Road / A6 junction roundabout by increasing the entry width and flare length of the A6 arm of the roundabout. o A new 3-arm roundabout to replace the current A6 / New Road priority junction. • Land to the south-east of Warwick Road, Kibworth Beauchamp: Outline planning permission (Ref: 15/01153/OUT) for 110 dwellings. Highways improvements include: <ul style="list-style-type: none"> o The provision of two new bus stops on Warwick Road to include raised and dropped kerbs and electronic information boards. <p>The indicative approved layouts of these three sites are shown on the appended plan (edged green), which also shows the land currently promoted by Manor Oak Homes for allocation in the emerging Local Plan (edged red). In addition to the above planning permissions and promotion of land for allocation in the emerging Local Plan, Manor Oak Homes are currently awaiting the outcome of a full planning application (Ref: 17/00500/FUL) for 45 retirement living apartments on land at St Wilfrid's Close, Kibworth Beauchamp (edged blue on appended plan) . This proposed development is aimed at meeting the Kibworths' clear need for additional elderly housing over the emerging Neighbourhood Plan period .</p> <p><u>Comments on the Kibworth Neighbourhood Plan (KNP) - Examination Version</u></p> <p>As the above background information demonstrates, Manor Oak Homes are actively involved in the development of the Kibworths and are committed to enabling the sustainable development of the parishes to help meet the local area's housing, employment, education and community infrastructure needs. It is in this context that Manor Oak Homes wish to make representations to the Kibworth Neighbourhood Plan Examination Version Consultation to ensure the KNP provides for the sustainable development needs of the area and fulfils the criteria necessary to meet the basic conditions for Neighbourhood Plans (as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990).</p> <p>This section details several comments that Manor Oak Homes wish to make on the KNP including their key concern that the KNP, in its current form, is premature to the outcome of Local Plan determinations on the</p>
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		<p>housing requirement for the Kibworths. As such, the KNP cannot be demonstrated to be in 'general conformity with the strategic policies contained in the development plan for the area' (a basic condition for Neighbourhood Plans) and misses an important opportunity to deliver sustainable development in accordance with the requirements of the National Planning Policy Framework (NPPF) and Planning Practice Guidance (PPG)</p> <p><u>Prematurity to the Harborough Local Plan</u></p> <p>As outlined above, one of the basic conditions for Neighbourhood Plans is that they must be in 'general conformity with the strategic policies contained in the development plan for the area'. Furthermore, Paragraph 16 of the National Planning Policy Framework (NPPF) states that the application of the presumption in favour of sustainable development means that Neighbourhoods Plans should support the strategic development needs set out in Local Plans, including policies for housing and economic development, and Paragraph 184 states that Neighbourhood Plans should not promote less development than set out in the Local Plan or undermine its strategic policies.</p> <p>It is clear from this that a key requirement of Neighbourhood Plans is to support the strategic development needs identified in Local Plans and that if they fail to do so they cannot be considered to meet the basic conditions for Neighbourhood Plans and should not be considered to represent a plan for sustainable development. Manor Oak Homes are concerned that, in its current form, the KNP cannot demonstrate that it is in general conformity with the strategic policies contained in the emerging Harborough Local Plan as no decision has yet been made on the required level of housing to be provided in the Kibworths.</p> <p>The introductory section of the KNP under point iii. Purpose of the Neighbourhood Plan correctly recognises that no decision has yet been made on housing numbers for the emerging Local Plan. It states:</p> <p><i>"The draft Neighbourhood Plan is prepared on the understanding that the decision about housing numbers will be taken by Harborough District Council prior to the Neighbourhood Plan being Made."</i></p> <p>However, despite this, Policy H1: Housing Provision of the KNP states:</p> <p><i>"Having regard to the high number of dwellings already constructed and existing sites with planning permission between 2011 and 2016 the Kibworths has exceeded its housing requirement over the Plan period. Therefore until such a time as there is an increase in housing need across the Harborough District or unless there is a failure to deliver the existing commitments, further housing development in the Parish will be restricted to Windfall development in line with Policy H2. "</i></p> <p>The KNP clearly contradicts itself here, but more importantly it is incorrect in stating that the Kibworths have already exceeded their housing requirements over the plan period as no decision has been made on this front.</p>
	Policy H1	

		<p>The supporting text to Policy H1 identifies that a report presented to the Local Plan Executive Advisory Panel Meeting on 19th September 2016 recommends that : the executive be recommended to agree that the preferred option to meet Harborough's housing needs in the emerging Local Plan is for a Strategic Development Area (SDA) on land east of Lutterworth and a reserve site at Scraftoft North SDA for 1200 dwellings to be released only if needed to contribute to meeting housing need from other local authorities. This preferred option (Option 6), as presented in the New Local Plan Options Consultation Paper (September 2015), includes a requirement for 0 homes to be allocated in the Kibworths. Based on this information, the KNP concludes that the housing requirement in the emerging Local Plan for the Kibworths is 0. This is incorrect as no decision has yet been made on the housing distribution for the emerging Local Plan and further work is needed to assess the deliverability of the preferred option of t he emerging Local Plan period to 2031.</p> <p>Following the above meeting, the Council's Executive met on 31st October to approve a revised timetable for publication of the Pre-Submission Local Plan. This was originally scheduled for December 2016 but was pushed back to July 2017. The report recommending this revised timetable stated that the benefits of extending the period for the preparation of the Local Plan include that this would enable ' outstanding remaining spatial issues linked to the emerging draft Local Plan to be progressed towards a satisfactory conclusion'. This makes clear that while Harborough District Council had indicated their preferred option, there was still a lot of further work needed before the Council would be in a position to formally decide on their preferred housing distribution and it was not expected that this decision would be made until the middle of 2017.</p> <p>The Council are now nearer to agreeing their preferred strategic housing distribution and ahead of an Executive Meeting on 15th May 2017, a report was published entitled ' Selected Spatial Options: Reassessment and Preferred Option'. This report recommends the following measures:</p> <p><i>"2.1. To note that the Objectively Assessed Need and the requirement for housing in the period 2011 to 2031 is 532 dwellings per annum (10,640 dwellings in the plan period).</i></p> <p><i>2.2. To recommend to Council an uplift of 20% over the Objectively Assessed Housing Need bringing the total provision in the draft submission to 12,800 dwellings, subject to receiving further information and strategic details of the risks of delivery of the East of Lutterworth and Scraftoft North SDAs and the justification for the 20% uplift, to allow for:</i></p> <p><i>i. a contingency to meet unforeseen circumstances; and</i></p> <p><i>ii. flexibility to make a contribution towards any unmet needs across the Housing Market Area (HMA), should they arise, in accordance with the statutory Duty to Cooperate. Subject to the outcome of 2.2 above</i></p> <p><i>2.3 To recommend to Council inclusion in the Draft Submission Local Plan of a hybrid option of Option 6, involving a Strategic Development Area (SDA) East of Lutterworth, and a variation of Option 4, Scraftoft North SDA, for meeting Harborough District's housing and employment needs, including additional flexibility as set out in 2.2 above, over the plan period to 2031.</i></p>
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		<p>2.4 To promote the use by the Council of its compulsory purchase order making powers under the Town and Country Planning Act 1990 in order to acquire land needed for essential infrastructure associated with the proposed East of Lutterworth SDA, subject to: the allocation of the East of Lutterworth SDA in the new Local Plan; putting in place the necessary agreements with the developers of the East of Lutterworth SDA to meet all of the Council's associated costs: to authorise the service of such notices under Section 330 of the Town and Country Planning Act 1990 and/or Section 16 of the Local Government (Miscellaneous Provisions) Act 1976 to obtain information about potentially affected land interests to enable a further report to be considered by Executive in due course."</p> <p>At the meeting on 15th May 2017, Executive Committee members agreed the recommendations above and it is therefore clear that the Council are now close to agreeing their housing requirement and strategic distribution of housing, subject to receiving further information and strategic details of the risks of delivery of the East of Lutterworth and Scraftoft North SDAs. However, it is important to recognise that the decision to agree to the Lutterworth and Scraftoft North SDAs only deals with a proportion of the overall housing need going forwards and does not include any housing requirement for settlement other than the two SDAs.</p> <p>At this stage it is not possible to give a precise figure for the housing figures required in the Kibworths, or any other settlement, but considering that the New Local Plan Options Consultation Paper (September 2015) identifies the Lutterworth SDA as comprising 2,238 homes (1,950 during the plan period to 2031) and the Scraftoft / Thurnby SDA as 1,182 homes it is clear that the combined SDAs will total approximately 3,100 homes and will not therefore meet the entire 12,800 dwellings proposed requirement. Some of this requirement has already been met over the first few years of the plan period, but there is still a significant need for more housing than can be provided in the SDAs. Beyond giving an indication of the preferred SDA option, there has been no further information published since September 2015 on the likely distribution of housing that is not met by the SDA/s and no indication given that this will remain the same as that presented in the Options Consultation Paper in September 2015 (i.e. zero homes in Option 6 for Kibworth). It is understood that this information is expected to be published in the pre-submission Local Plan that will be taken to committee on 19th June.</p> <p>This point is a made more important because it is clear that the Lutterworth SDA is highly unlikely to able to deliver its full quota of housing during the plan period to 2031. The speed of housing delivery for Lutterworth SDA is raised as an issue in the minutes of the Local Plan Executive Advisory Panel Meeting on 19th September 2016 (which raise concern regarding the scale of infrastructure required, details of landowner cooperation and assumptions on the speed of housing delivery) and the report to the Council's Executive on 15th May 2017 which identifies 6 amber risks for delivery relating to: ownership of land; potential use of a CPO; accuracy of infrastructure cost estimates; evidence of impact of increased traffic in Lutterworth and surrounding rural roads; Highways England's view; and ensuring that delivery of the scheme does not stall at the trigger point for construction of the M1 bridge and completion of the Spine Road. The report states that these risks are amber rather than red on the basis that further information on these matters is likely to be</p>
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		<p>provided by the promoter in the near future, thus mitigating the currently more serious risks. If this further information is not received by 30 May 2017 it states that a further report will need to be brought to the Executive recommending an alternative way forward at that time.</p> <p>The above indicates that there are still questions to be answered in predicting housing delivery at Lutterworth, but as a guide to how many homes are likely to be delivered during the plan period at this SDA we can look at industry standard delivery rates. A recent report from Nathaniel Lichfield and Partners (lppanning.com/uploads/files/2016/11/649353.pdf) identifies that the average planning approval period for schemes of 2,000+ dwellings is 6.1 years and that following the grant of planning permission the average annual build out rate is 161 dwellings.</p> <p>Based on these industry figures, it is clear that the Council's predictions of 1,950 during the plan period may just about have been possible if a planning application had been submitted for the Lutterworth SDA prior to September 2015, but no planning application has yet been submitted and it is clear that there are significant issues that still need to be resolved before a planning application is possible. Realistically the earliest a planning application for the Lutterworth SDA can be expected is at the same time as the predicted adoption date of the Local Plan in September 2018. Based on the industry average, this would mean it would gain planning approval in late 2024 and over the 7 years till the end of 2031 would deliver just 1,127 homes. This is far below the predicted 1,950 homes and would leave 823 homes to be accommodated elsewhere in the district up to 2031, in addition to the as yet unallocated housing requirement not to be provided in SDAs</p> <p>It is clear from this that even with both SDAs, there will still be a need for significant further development elsewhere in the district. As one the larger settlements in the district and one of only three settlements considered for an SDA (and the only one not to have an SDA proposed) it is reasonable to assume that Kibworth will be considered the most sustainable option to meet the shortfall in housing supply and will be required to meet a significant proportion of the unmet need. Based on this, the KNP incorrectly assumes that the required housing distribution across the remainder of the district is now fixed in line with the figures given in the New Local Plan Options Consultation Paper (September 2015) which identified a zero home requirement for Kibworth alongside the Lutterworth SDA option. On this basis, the KNP is premature to the emerging Local Plan and cannot be said to be in 'general conformity with the strategic policies contained in the development plan for the area', one of the basic conditions that Neighbourhood Plans must meet, as it fails to plan for the level of housing that it likely to be required in the Kibworths.</p> <p><u>Limits to Development</u></p> <p>It is clear from the discussion above that the Kibworths will be required to accommodate a significant level of residential development over the plan period, that we predict could be in the order of 400-600 homes. It is clear that such a level of development would not be able to be accommodated within the proposed limits to development set by the KNP and as such, in order for the plan to meet the basic conditions for Neighbourhood</p>
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		<p>Plans, we recommend that the KNP Steering Group engage with the owners and promoters of land around the Kibworths to assess the sustainability of sites ahead of the housing requirement for the Kibworths being determined by Harborough District Council. This will ensure that the KNP can progress in confidence that it is meeting the Kibworths' needs for sustainable development over the plan period.</p> <p>Manor Oak Homes' land to the west of the Kibworths represents a uniquely sustainable option to accommodate the predicted level of growth required in the Kibworths. It is well connected to existing approved development and to the centre of the village and would enable the provision of a new primary school which is desperately needed and indeed supported by KNP Policy CSA2.</p> <p><u>Windfall Development</u></p> <p>Manor Oak Homes support the inclusion in the KNP of Policy H2 - Windfall Sites which supports development proposals for infill and redevelopment sites, but is concerned that the definition of a windfall site is too restrictive. The policy states that windfall developments are small scale and the supporting text states that windfall sites are sites with a capacity of up to 5 dwellings. It is considered that this threshold is unduly restrictive and precludes unallocated sites from coming forwards within the limits to development that can be shown to sustainably accommodate more than 5 dwellings. The inclusion of a threshold is therefore felt to be unnecessary and would prevent the sustainable development of the Kibworths. The KNP therefore fails to meet the basic condition of contributing to sustainable development.</p> <p><u>Affordable Housing</u></p> <p>KNP Policy H3 states that development proposals for new housing where there is a net gain of ten or more dwellings should provide at least 40% affordable housing in accordance with district wide planning policies. Harborough District Council published its recommended approach to affordable housing in a report to the Local Planning Executive Advisory Panel on 22nd August 2016. This report includes the following draft policy: " Subject to scheme specific viability assessments, qualifying development will be required to provide: a) a minimum of 20% Starter Homes (except for those types of residential schemes excepted by national regulations), and b) 20% Other Affordable Housing (to comprise an equal balance of Shared Ownership and Affordable Rented Housing) unless an alternative tenure mix is justified by evidence of local housing need, registered provider views or scheme specific viability assessment".</p> <p>This policy indicates the preferred policy approach for the emerging Local Plan, but it is still subject to further assessment and potential amendments. In this context, it is recommended that Policy H3 be amended to simply state that "Affordable housing should be provided in accordance with district wide planning policies". This approach will avoid any conflict with emerging Local Plan policies that are still being developed.</p> <p><u>Need for Elderly Accommodation in the Kibworths</u></p>
	Policy H2	
	Policy H3	

The Leicester and Leicestershire Housing and Economic Development Needs Assessment (HEDNA, January 2017) predicts that the number of residents aged over 65 across the Leicester and Leicestershire Housing Market Area (HMA) is projected to increase by 75% over the period to 2036 and that the population aged over 75 in Harborough is expected to more than double between 2011 and 2031 from 7,200 people to 14,655 people (an increase of 104%).

It is reasonable to assume that the population aged over 75 will grow in the Kibworths at a similar rate to that of the district overall. Census data shows that in 2011 there were 5,433 people in Kibworth Beauchamp and Kibworth Harcourt combined and that 559 of these people were over 75. Applying a growth rate of 104% to the current population of over 75s in the Kibworths gives a figure of 1,140 people over 75 in the Kibworths by 2031.

The Leicestershire HEDNA uses a toolkit that has been developed by the Housing Learning and Information Network (LIN), in association with the Elderly Accommodation Council and endorsed by the Department of Health, to predict the level of additional elderly accommodation required to meet the growing number of elderly people in the county. This toolkit states that there should be 170 units of specialised elderly accommodation (other than registered care home places) per thousand people aged over 75 years.

Based on the above standard of 170 units per 1,000 people over 75, the need in Harborough for specialised elderly accommodation (excluding registered care home places) over the emerging plan period is 1,267 dwellings or 51 dwellings per year. In the Kibworths, the need in 2011 was 95 units and the need in 2031 will be 194 units.

The table below shows the current level of specialised elderly accommodation in the Kibworths. It includes both retirement/ sheltered housing and registered care home places and shows that there are currently 100 retirement/ sheltered housing units and 75 care home places in the Kibworths. For the purposes of calculating the need for specialised elderly accommodation, the Housing Learning and Information Network (LIN) toolkit excludes registered care home places, giving a total figure of 100 units in 2011 against a requirement for 95 (n.b. all the properties listed in the table below were constructed prior to 2011).

Specialised Elderly Accommodation in the Kibworths

Property	Type	Number of Units/ Rooms	Tenure	Age Restriction
Beauchamp Gardens Smeeton Road, Kibworth, Leics, LE5 0LF	Retirement housing	16 Flats	Private	60+

		Stuart Court High Street, Kibworth Leics, LES OLR	Sheltered Housing (reserved for retired clergy)	30 Flats (10 meeting local need)*	Social Rent	55+
		Morrison Court Off Weir Road, Kibworth Beauchamp, Leics, LES OJE	Sheltered Housing	54 Flats and Bungalows	Social Rent	60+
		Kibworth Knoll 12 Fleckney Road, Kibworth , Leics, LES OHE	Residential Care Home	36 rooms	Private	55+
		Kibworth Court Smeeton Road, Kibworth, Leics, LES OLG	Residential Care Home	39 rooms	Private	No Restriction
		Total Retirement/Sheltered Housing		100 (80 meeting local need)		
		Total Registered Care Home Places		75		
		Total		175		

*Flats at Stuart Court are reserved for retired clergy and their contribution towards meeting local need has therefore been reduced to 10 units- see paragraph 7.9.

At first glance it would therefore appear that the Kibworths had an overprovision of units in 2011. However, on further inspection it is clear that the 30 units at Stuart Court, which are reserved for retired clergy, should not all be included in the supply as they are not available for the vast majority of local people. It is of course true that many of the people living at Stuart Court in the 2011 Census data would have been over 75 and would therefore have skewed our calculations of the demand for units. However, even if there were 2 people over 75 living in every dwelling at Stuart Court (60 people total), this would only result in a need for 10 additional units in our calculations based on the toolkit guidance of 170 units per 1000 people (or 0.17 per person). It is therefore reasonable to subtract the units at Stuart Court from our supply data, except for these 10 units, giving an actual (if overly optimistic) level of supply in the Kibworths in 2011 that meets local needs of 80 units against a demand for 95.

It is clear from the above that the level of supply in 2011 was already below that required for the Kibworths and there have been no developments of specialised elderly housing in the villages since this time. The predicted need for specialised elderly accommodation in the Kibworths in 2031 is 194 units meaning that based on current levels of supply there is a need for 114 extra units to be provided in the next 14 years.

Based on the above clear need for elderly housing accommodation in the Kibworths to meet the needs of current residents of the villages as they get older, it is clear that the KNP fails to provide flexible enough

		<p>policies to meet this need. Not only does the plan fail to plan for any housing provision to extend the current Limits to Development, but even within the Limits to Development it seeks to restrict developments to 5 homes or fewer. Elderly and retirement properties of 5 homes or fewer are simply not a practical or deliverable prospect due to requirements for combined communal facilities and services and these policies therefore effectively restrict the provision of any homes for the elderly and the KNP fails to meet the need for sustainable growth of this sector of the housing market. The KNP therefore again fails to meet the basic conditions for neighbourhood plans.</p> <p><u>Environmental Inventory</u></p> <p>The environmental inventory section of the KNP states that it is based on fieldwork conducted by "a group of local residents some of whom were environmental and landscape professionals". In the absence of further information on the qualifications of these professionals it is not clear how robust this assessment can be considered to be, not least due to the wide range of disciplines that have been covered including arboriculture, ecology, heritage and landscape and visual impact. It would appear from a search of the KNP website that the information contained in the KNP and a simple Environmental Inventory list form the totality of the evidence base on these subjects. If further evidence prepared by qualified professionals is available, we would suggest that this should be published in support of the KNP. Alternatively, if these reports and/ or the relevant detailed assessments are missing, we would recommend that they be conducted as soon as possible to ensure the emerging KNP is based on robust evidence. This is particularly important in the context of the predicted need for housing allocations to come forward in the KNP as the location for new housing will need to be based on a thorough assessment of the constraints and opportunities of potential locations. Without a robust evidence base in place, the KNP cannot be said to contribute to the achievement of sustainable development and it does not therefore meet the basic conditions for a Neighbourhood Plan.</p> <p>In particular, considering the large areas of the parish covered it is recommended that robust evidence is published of the assessment undertaken of Important Views and Ridge and Furrow.</p> <p><u>Important Views</u></p> <p>On the map at Figure 13 of the KNP, important views appear to cover almost the entire area of the parishes. In this context, it is considered that in order for Policy ENV 7 to avoid unnecessary constraints to sustainable development, further details of the assessment conducted, its methodology and of the particular aspects of each view that are considered to be important should be published as a matter of priority.</p> <p><u>Ridge and Furrow</u></p> <p>No evidence of how the ridge and furrow survey was conducted is provided. This is important as it appears to have missed out an important area of ridge and furrow on the playing fields between Hillcrest Avenue and the</p>
	Policy ENV7	

railway line. This land is shown edged red on the plan of 1940s ridge and ridge at Figure 1 below. Despite this land being publically accessible (making surveying easy) and clearly having excellent surviving ridge and furrow, it is not included on the map at Figure 11 of the KNP. This raises questions regarding the robustness of the assessment and we suggest this is reviewed and details of the survey and its methodology be published to ensure transparency.



Figure 1. Surviving ridge and furrow in the 1940s

Land west of the Kibworths

In light of the discussion above which predicts that a housing requirement of between 400-600 new homes in the Kibworths will be identified in the emerging Local Plan, Manor Oak Homes have promoted their land to the west of the Kibworths (off Fleckney Road and Warwick Road) as identified on the appended plan for allocation in the emerging KNP for residential development, a new primary school and community uses in order to meet the Kibworths' need for sustainable development over the plan period.

This land has the capacity to accommodate the predicted level of development that will be required in the Kibworths and has an added benefit in that it would also be an ideal location for a new primary school and community uses. The capacity of Kibworth Primary School is identified as an issue in the KNP and Policy CSA2 states that proposals for a new school will be supported.

		<p>The promoted land is suitable, available and achievable for the proposed level of development such that it should be considered to be deliverable in accordance with the requirements of NPPF Paragraph 47. As outlined above, the KNP is not in general conformity with the strategic policies contained in the development plan for the area as no decision on the Kibworths' housing requirement has been reached. Furthermore, the KNP Steering Group have made no effort to independently assess the level of growth required in the villages going forwards. It is recommended that the plan's approach to housing provision is reconsidered and that options for housing allocations are assessed in anticipation of a requirement being identified in the emerging Local Plan. In this context, Manor Oak Homes' land to the west of the Kibworths is a uniquely sustainable option for development.</p> <p><u>Suitability</u></p> <p>From a strategic point of view, land to the west of Kibworth is the most suitable and sustainable direction for the future growth of the settlement. The land is subject to the least constraints on development in key environmental, physical and legal terms when compared with other potential development options in the Kibworths.</p>
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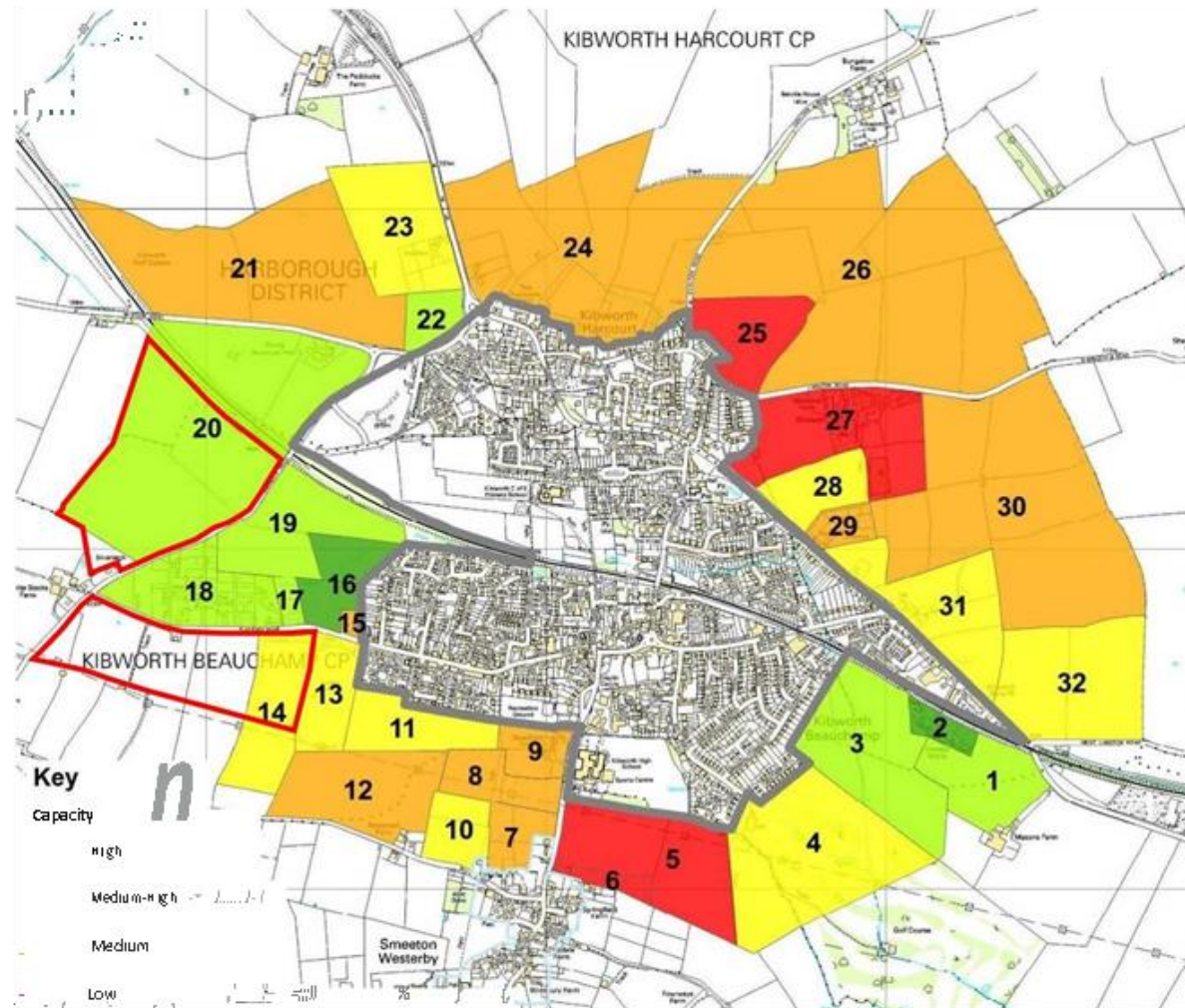
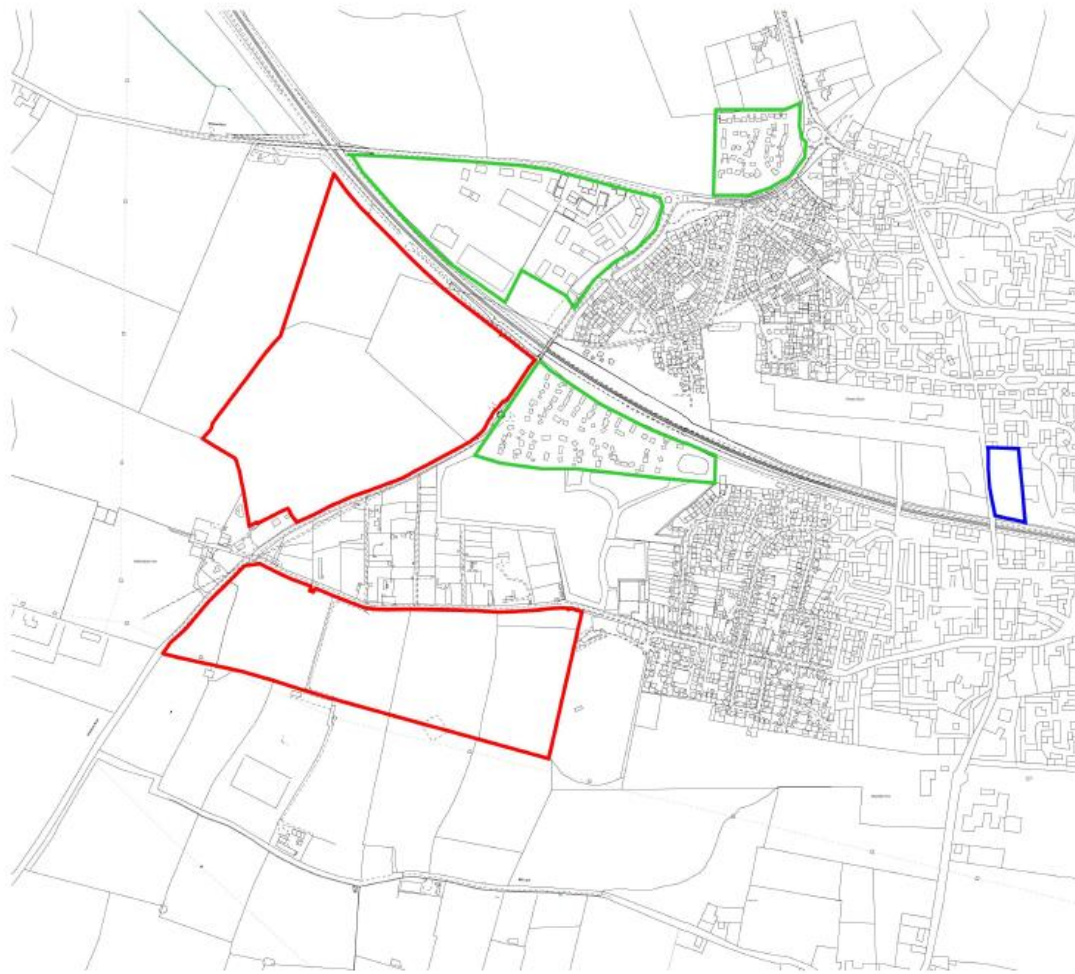


Figure 2. Rural Centres Landscape Capacity Study (July 2014) Map of Kibworth

		<p>A key piece of evidence in comparing the suitability of potential development sites in the Kibworths is Harborough District Council's Rural Centres Landscape Capacity Study (July 2014). This study considers the existing landscape character of parcels of land throughout the Borough and assesses their capacity to accommodate development in terms of landscape impact. This capacity is ranked according to a traffic light system from low, medium-low, medium, medium-high, to high. As shown on the plan taken from this study at Figure 2, the west side of the village has the greatest capacity to accommodate development in landscape terms, without undue harm to the wider countryside and rural setting of the village. The promoted land is shown edged red on this plan which, while some parts of the promoted land are not assessed in this study, clearly demonstrates that the promoted land is in an area with a high-medium capacity to accommodate development and importantly that it is in an area that scores far more favourably than land to the north and east of the Kibworths that has been promoted as the other potential option for a Kibworth SDA. Furthermore, since this study was completed, Manor Oaks Homes have secured planning consent on other parcels of land to the west of the Kibworths which will have increased the capacity of the surrounding landscape to accommodate development.</p> <p>Development to the west of the Kibworths would also help to preserve the important heritage assets elsewhere. In particular, the historic core of Kibworth Harcourt lies in the north east of the settlement and is protected by the Kibworth Harcourt Conservation Area, the boundary of which extends to cover some of the immediately adjacent fields, in recognition of the importance of the rural setting of the heritage assets. It is also noted that the Grade II listed Kibworth Hall lies along the Carlton Road. The importance of the surrounding rural landscape to the setting of this heritage asset is considered in the Council's Landscape Capacity Study. Land to the north-east of the village is also the site of a former Roman Settlement, so is likely to have considerable archaeological constraints.</p> <p>The promoted land presents the opportunity to extend the existing direction of growth that has been demonstrated to be sustainable and provide housing in close proximity to the wide range of facilities in the centre of Kibworth Beauchamp - including the primary and secondary schools, supermarkets and other shops, health centre and other services. What is being put forward in these representations is a vision for a strategic, comprehensively planned development which clearly could enable the provision of other local facilities in the form of a primary school and community services. This would thereby further enhance and ensure the sustainability of the development, as well as enhancing the provision of necessary services in the immediately surrounding existing residential areas thereby reducing the need to travel.</p> <p>Vehicular access to the sites can be achieved from Warwick Road and Fleckney Road respectively, ensuring the sites can be well connected to the local network. Furthermore, as outlined above, the site is located close to planned improvements to local highways, footpaths and bus stops that will be provided through Manor Oak Homes' existing approved developments to the west of the Kibworths. These improvements will further enhance the sustainability of the promoted land to accommodate development and mean that land to the west of the Kibworths is more sustainable than land elsewhere in the parishes. There is also an opportunity to provide further highways improvements as part of the proposed development. For example, the development of the allocated land could provide a 'pavement along Fleckney Road and Warwick Road' as identified as a priority by KNP Policy T4.</p> <p>The sites lie in Flood Zone 1 (as per Environment Agency's flood maps) wherein there is a low risk of flooding (less than</p>
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		<p>1 in 1000 year fluvial flooding event). Land in Flood Zone 1 is suitable for all types of development. Furthermore , development of the identified land would not result in the coalescence of Kibworth with any nearby settlements, something that could result from development to the south of the village, in the current open gap between Kibworth Beauchamp and Smeeton Westerby, which is identified in Figure 15 of the KNP as an Area of Separation to be protected by Policy ENV 9 .</p> <p><u>Availability</u></p> <p>We can confirm that the promoted land is in Manor Oak Homes' ownership and as such, we can confirm the availability of these sites and the wishes of the landowner to bring forward the land for development.</p> <p><u>Achievability</u></p> <p>There are no physical, environmental or legal constraints which would prevent or constrain the development of this site. As such, the site is achievable.</p> <p>The above summary demonstrates that the promoted land represents a suitable, available, achievable and most importantly sustainable location for residential development. As such, and in light of the predicted need for significant housing growth in the Kibworths in the emerging Local Plan, which means the KNP in its current form does not meet the basic conditions test, we consider that the Neighbourhood Plan group should positively consider the potential for making housing allocations in the KNP and the benefits of allocating this land for development.</p> <p>We trust that these representations will be considered in the assessment of the KNP and that the inspector will reflect on the approach to development adopted in the KNP which can only be described as not in my back yard. The KNP fails to address the likely requirement for housing allocations in the Kibworths and therefore fails the test of being in general accordance with the emerging Local Plan and fails to promote sustainable development. The KNP in its current form fails to meet the Basic Conditions for Neighbourhood Plans and should not be passed. Please do not hesitate to contact me if you have any questions or require clarification on any of the points raised in this letter.</p>
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		 <div data-bbox="1836 191 2060 255"> <p>Revision: 13.12.16 A: Drawing updated to include proposed phase 1, 2 & 3 and DWH parcels.</p> </div> <div data-bbox="1836 702 2060 861"> <p>rgp Architects · Project Managers · Quantity Surveyors 130 New Walk Leicester, LE1 7JA Tel: 0116 204 5800, Fax: 0116 204 5801 email: design@rgp.co.uk, www.rgp.co.uk</p> </div> <div data-bbox="1836 893 2060 1133"> <p>Project: A Development at Kibworth Client: Manor Oak Homes Street title: Red Line: Extent of Land South of Pickway Road & Land West of Warwick Road & South of Railway line Plot: 4095B1 020 A Scale: 1:5000 @ A2 Date: December 2016 Drawn: SA Checked: RMW</p> </div> <div data-bbox="1836 1165 2060 1197"> <p><small>All dimensions to be checked on site. This drawing is the copyright of the architect and not to be reproduced without their permission. Copyright Survey map information reproduced with permission of HESD Crown Copyright reserved. 016 204 5800</small></p> </div>
Resident	Primary School Page 39	<p>The Neighbourhood Plan states that ‘access to the school along Hillcrest Avenue and the dangerous congestion and parking it causes is also a major concern’</p> <p>The only other major access to the school is along St Wilfrid’s Close where there is a footpath which leads to the school and playing fields.</p>

		<p>Twice a day this causes congestion all along St Wilfrid's Close with parents with cars taking their children to school. The road is very narrow and has six right angle bends in it. Parking is done on the pavement and there is a major concern for health and safety . The planning application has been made for 45 houses at the end of the close where the footpath is situated. This will double the number of properties already in the close.</p> <p>The traffic generated by the new development can only significantly increase the health and safety concerns.</p>
Resident	Map ref 073 Page 74	<p>In the Neighbourhood Plan this area is designated as a green area.</p> <p>The Development Planning Application for 45 dwellings on this site at the end of St Wilfrid's Close seeks to state that the ridge and furrow is not sufficiently important to prevent development.</p> <p>The issue as I see it is that there has been a very great development of housing in Kibworth with a large number still in the pipeline.</p> <p>Green Space is becoming scarcer and this particular area is in the centre of the village and should be protected for future generations.</p> <p>In addition this area is home to a number of protected species – bats, newts, hedgehogs and badgers.</p> <p>The developers are trying to tell us that these will migrate to the lower end of the site. It is my belief that introducing 45 properties in the development will bring a large number of pet cats, which will spell the end of any protected species. Plus the additional lighting will deter native species.</p>
Natural England		<p>Thank you for consulting Natural England on The Kibworths 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 a draft version of The Kibworths Neighbourhood Plan in response to a consultation from the Kibworth Neighbourhood Planning Group.</p> <p>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.</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries</p>

		please do not hesitate to contact us.
resident	Page 72 - Figure 5 and figure 6 Conflicts with HS9 Core Strategy	Figure 5 on page 72 of the Kibworth Neighbourhood Plan (KNHP) shows that during the consultation period the paddock land at the end of St Wilfrid's Close (numbered 73 on figure 6) was identified by residents as an area of valued open space and views and should be protected. Unfortunately, the KNHP didn't designate this land and fails to say why not. This is not in general conformity with the HDC Core Strategy as the land is designated as Important Open Space in the saved Policy HS9 of the HDC Core Strategy. This land should be designated as valued open space and views in line with the Core Strategy.
Andrew Granger and Co		<p>1. Introduction</p> <p>1.1. Andrew Granger and Co. Ltd specialises in the promotion of strategic land for residential development and commercial uses. As a company we have vast experience in contributing to the Neighbourhood Plan process, and we are also heavily involved in the promotion of client's land through various Local Plan preparations throughout the country.</p> <p>1.2. On behalf of Merton College and Leicester Diocesan Board of Finance we are seeking to work with the Kibworth Neighbourhood Plan Group in promoting the land to the north-east of Kibworth Harcourt (Appendix 1), as a strategic development area.</p> <p>1.3. This document provides a written submission to the Kibworth Neighbourhood Plan Submission Draft Consultation.</p> <p>1.4. Further the purposes of this report, Kibworth Harcourt and Kibworth Beauchamp will be referred to as the 'villages' or the 'Kibworths'.</p> <p>2. Planning Policy Context</p> <p>2.1. We have made Harborough District Council [HDC] aware of the site's availability for development through various submissions, including to the new HDC Local Plan process. The site is one of three Strategic Development Area [SDAs] options currently under consideration for allocation within the emerging HDC Local Plan.</p> <p>2.2. We have carried out initial ecology, landscape and archaeology work on the SDA area along with highways and viability work to support the proposal.</p>

		<p>3. Site and Development Potential</p> <p>3.1. The proposed development site has a total developable area of approximately 159 hectares (392.89 acres) and is located to the north-east of Kibworth Harcourt, adjacent to the village boundary and the A6, as shown outlined in red in Appendix 1.</p> <p>3.2. The proposed development would provide two new residential neighbourhoods that would work in conjunction with the existing historic centre of Kibworth Harcourt to provide up to 1,600 new homes. Each neighbourhood would have a distinct identity, providing facilities that complement each other and support the existing villages of Kibworth Harcourt and Kibworth Beauchamp.</p> <p>3.3. The masterplan provides for a two form entry primary school, a local service centre and Section 106 funding could provide improvements to the local high school.</p> <p>3.4. The proposed development would provide 5 hectares of employment land to be delivered in conjunction with the phasing of residential development. The employment land would be provided in two distinct parts with additional roadside facilities.</p> <p>3.5. The proposed bypass will provide the opportunity to remove a significant amount of through traffic from the existing A6, which will assist in reducing congestion at peak times, an issue which has been highlighted on numerous occasions. The bypass will join the existing A6 with one new roundabout to the north and a second new roundabout south east of the Kibworths. The link road will include new roundabouts to provide access points into the proposed development.</p> <p>3.6. These changes would result in many benefits to the residents of the Kibworths and the wider county by delivering more reliable journey times along a corridor designed to modern standards. It would also result in major improvements along the existing A6 corridor in terms of reduced noise, improved air quality and safer pedestrian movement throughout the villages. Traffic predictions suggest that there will be a 50% reduction in traffic travelling through Kibworth by 2035 as a result of the new bypass and associated improvements.</p> <p>3.7. The proposed masterplan has been designed to retain the existing mature landscape framework and reinforce this landscape with native species in order to integrate the proposed development into its surrounding context. Views between the site and the wider countryside will be filtered by trees and hedgerows; additional planting would complement the retained features in order to create a positive interface between the bypass and the wider landscape.</p> <p>3.8. A key feature of the proposed development is the creation of several green 'spines' running from the Kibworths to the open countryside. These 'spines' would provide an opportunity for residents, existing and new, to benefit from the physical connections to the wider landscape. Furthermore, new public open space will</p>
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		<p>incorporate leisure trails and a range of newly created wildlife habitats.</p> <p>3.9. As such, we consider the proposed SDA development suitable for providing significant residential and employment land suitable to meet the needs of the District, it would also provide a much needed bypass to relieve congestion in the Kibworths on the current A6. The proposed masterplan has been designed to be sympathetic to existing residents by retaining a large proportion of the existing mature landscape features which would contribute to more than 50% of the site being allocated for public use as formal and informal open space.</p> <p>4. Comments on The Kibworths Neighbourhood Plan</p> <p>4.1. On behalf of Merton College and Leicester Diocesan Board of Finance we wish to make the following observations on the Kibworths Neighbourhood Plan Submission Draft Consultation. Overall, we agree with the vision and objectives set out in the Draft Neighbourhood Plan, however, to ensure that the plan is robust and provides flexibility, we make the following comments.</p> <p>4.2. In respect of Policy SD1: Presumption in Favour of Sustainable Development and Policy SD2: General Policy Principle, we strongly support the inclusion of these policies in the Kibworth Neighbourhood Plan in line with Paragraph 14 of the National Planning Policy Framework [NPPF]. We are encouraged by the Council's desire to positively consider proposals that contribute to the sustainable development of the Kibworths.</p> <p>4.3. We are concerned by the proposed inclusion of Policy SD3: Limits to Development in the Kibworth Neighbourhood Plan. Whilst we appreciate the desire of the Neighbourhood Plan to direct development towards the most appropriate locations within the Kibworths, we are concerned that the inclusion of this policy would inhibit the ability of the HDC Local Plan to meet its strategic aims. As such, the policy should be revised to include a set of criteria by which future development proposals located outside the defined limits to development will be judged. These should include guidance for the circumstances in which development in these locations will be positively considered, such as when the District has less than a 5 year housing land supply. This will ensure flexibility within the Neighbourhood Plan and also enable Harborough District Council to adopt a flexible approach to the delivery of new homes, when there is a less than 5 year supply.</p> <p>4.4. With regards to Policy CSA1: Pre-School Provision, we fully support the provision of additional pre-school places available to families within the Kibworths in line with Paragraph 17 and 72 of the NPPF and Policy CS1 of HDC's Core Strategy.</p> <p>4.5. We fully support the expansion and/or provision of a new school within the Parish that is advocated by Policy CSA2: Schools, in line with Paragraph 17 and 72 of the NPPF and Policy CS1 of HDC's Core Strategy. The proposed SDA scheme has allocated land for the provision of a new 2-form primary school in a manner that complies with the criteria outlined in this policy of the Neighbourhood Plan. The provision of a new school</p>
	Policy SD1 and SD2	
	Policy SD3	
	Policy CSA1	
	Policy CSA2	

		<p>could be brought forward as part of a SDA proposal; however, it is unlikely that this would be replicated if the villages accepted piecemeal development.</p>
	Policy CSA3	<p>4.6. We support the provision of a multi-functional amenities centre as supported by Policy CSA3: Clubs and Groups in line with Paragraph 70 of the NPPF, Policy CS1 of the HDC Core Strategy and Policy HC2 of the emerging HDC Local Plan. We would reiterate our concerns regarding the use of Limits to Development in relation to this policy; we would argue that the land requirements for a facility of this nature are unlikely to be catered for within the village confines. The proposed SDA scheme would provide a multi-functional local centre which would meet these needs in a manner suitable for the requirements outlined in this policy.</p>
	Policy CSA4 and Community Action CSA2	<p>4.7. With regards to Policy CSA4: Sporting Facilities and Community Action CSA2: Sporting Facilities, we fully support the provision of new and/or improved sporting facilities in line with Paragraph 73 of the NPPF and Policy CS8 of the HOC Core Strategy. Once more, we would reiterate our concerns about the use of Limits to Development and the impact it would have on the delivery of new homes and community facilities and services. The proposed SDA masterplan allocates land for open space which could provide sports pitches, whilst the Section 106 agreement that would be sought as part of the development could contribute to funding additional facilities such as tennis courts or changing rooms. Furthermore, we would encourage the removal of the CSA2 from the community action policy in order to assist with the functionality of the plan.</p>
		<p>4.8. In respect of Policy CSAS: Health and Wellbeing, discussions have taken place between the Agent and the Local Health Partnership/Trust regarding the potential for the proposed SDA scheme to provide a new medical facility or to extend the existing facilities within the Kibworths.</p>
	Policy CSA6	<p>4.9. We support the proposals outlined in Policy CSA6: Parks and Green Spaces and Community Action: CSA3: Parks and Green Spaces in line with Paragraphs 73 and 74 of the NPPF and Policy CS8 of the HDC Core Strategy. The proposed SDA development would provide 84 hectares of public open space which will include green landscaped 'spines' running through from Kibworth Harcourt to the open countryside.</p>
	Policy CSA7	<p>4.10. We fully support the retention, provision and enhancement of community services as identified by Policy CSA7: Important Community Facilities. The proposed SDA scheme master plan includes the provision of numerous additional community facilities, including a new multi-functional local centre and a new two-form primary school. Future development in the Kibworths would assist in the delivery of new community facilities and services.</p>
	Policy H1	<p>4.11. In respect of Policy H1 : Housing Provision, we strongly disagree with the approach to the delivery of new homes. We suggest that the current wording does not reflect the positive approach to supporting sustainable development identified in Policy SD1, and that it would be more appropriate to pursue a criteria-based policy. In taking this approach, it would provide a positive approach towards sustainable development whilst appreciating the significant levels of development that has already been committed within the</p>

		<p>Kibworths.</p> <p>4.12. Furthermore, we would advise the Neighbourhood Plan Group that the residential requirements for Kibworth currently proposed for inclusion in the emerging Harborough District Council Local Plan, and as such provide the basis for the above policy, are not based on the most up-to-date information and therefore are subject to revision. Paragraph 158 of the NPPF states that 'each local planning authority should ensure that that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental prospects of the area'. The Councils of Leicester and Leicestershire have produced a Housing and Economic Development Needs Assessment [HEDNA] report which was published in January 2017. The housing requirements included in the emerging Harborough Local Plan have not been scrutinised in relation to the updated Objectively Assessed Housing Needs [OAHN] contained within this document. However, it is thought that the OAHN contained within the report is likely to have a significant impact on the residential requirements for the District, and therefore this would have a knock on effect on the amount of residential development proposed for the Kibworths. Consequently, we would recommend that adoption of the Plan or further consultation should be undertaken once the housing requirements included in the emerging Harborough Local Plan have been scrutinised in relation to the updated OAHN included within the HEDNA.</p> <p>4.13. It is important to note that any housing requirement identified by HDC is to be considered a minimum, and this should be reflected in the Neighbourhood Plan. Therefore, it may be beneficial for the Neighbourhood Plan Group to identify a potential reserve housing site which would come forward if future circumstances dictate that more residential development is required in the Kibworths. In doing so, this would provide the plan with flexibility, but would also ensure that the local community retains control over where future development is located.</p>
	Policy H5	<p>4.14. With regards to Policy H5: Housing Mix, we fully support the provision of a wide range of housing types and sizes in line with Paragraph 47 and 50 of the NPPF, Policy CS3 of the HDC Core Strategy and Policy H5 of the emerging Local Plan. The proposed SDA scheme would provide a range of housing types and sizes, including bungalows, starter homes and family homes ranging in size from 2 to 5 bedrooms.</p>
	Policy H7	<p>4.15. We fully support the design principles advocated by Policy H7: Building Design Principles of the submission version of the Kibworth Neighbourhood Plan. We believe that good planning and good design are inseparable. We fully support the requirement for residential schemes to meet the highest design standards and respect the residential amenity of existing neighbours in line with Paragraphs 17, 56 and 58 of the NPPF, Policy CS11 of the HDC Core Strategy and Policy GD8 of the emerging Local Plan. Furthermore, we support the requirement of development schemes to enhance biodiversity and retain and enhance hedges and trees in line with Paragraph 109 of the NPPF. We also support the encouragement for the use of Sustainable Urban Drainage Systems given by this policy in line with Policy CS10 of the HDC Core Strategy. The proposed SDA scheme has been designed with significant consideration given to all of the criteria contained within this policy of the Neighbourhood Plan, the scheme would provide new residential development of the highest building</p>

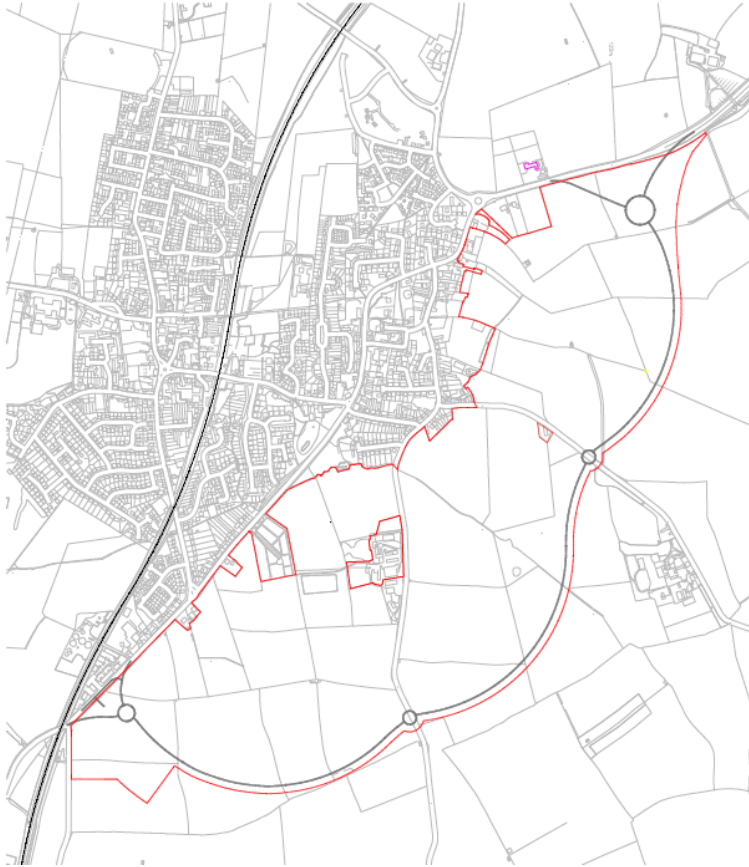
	<p>Policy H11</p> <p>design standards inspired by its location adjacent to the historic centre of Kibworth Harcourt and the open countryside. The proposed development would retain significant amount of mature hedgerows and trees that are an intrinsic element of the site's rural landscape, and would provide new planting of native species to enhance the site's boundaries. Furthermore, the scheme would be designed to utilise SUDS including drainage ponds and permeable surfaces as part of the surface water management scheme.</p> <p>4.16. We fully support the inclusion of the Kibworth SDA as Policy H11: North East Kibworth SDA in the Submission version of the Neighbourhood Plan. If approved, the bypass, proposed as part of the development, would greatly assist in reducing the amount of traffic travelling through the Kibworths on the A6. In respect of construction, we propose that it is reasonable to expect the bypass construction to take place on a phased approach in line with the build out rates of the whole scheme.</p> <p>4.17. Furthermore, we support the protection of wildlife and biodiversity in line with Paragraph 109 of the NPPF and Policy CS8 of the HDC Core Strategy. Initial investigations by our ecology consultants have found:</p> <p>'The preliminary ecological investigations completed to date have not identified any 'in principle' constraints on ecological grounds such as statutory and non-statutory designations.</p> <p>The initial Extended Phase 1 Ecological Assessment has confirmed that the habitats present within the site are of low intrinsic value, therefore providing significant opportunities for biodiversity enhancement'</p> <p>4.18. Furthermore, we fully support the requirement outlined in this policy to protect the landscape and historic assets of Kibworth Harcourt in line with Paragraph 128 and 129 of the NPPF and Policy CS11 of the HDC Core Strategy. Initial investigations into the site have concluded 'whilst there are designated heritage assets within the site, these are not sufficient in number or extent to constrain the development potential of the site as a whole. Sensitive master planning could respect and protect their setting and heritage value'. The proposed SDA scheme has been designed to include significant areas of open space and retain large proportions of mature landscaping that exists on the site; these features will be enhanced as part of the proposals in order to retain the landscape character. As outlined above, the initial investigations have identified heritage assets on the site and this has been incorporated into the masterplan in order to enhance their long term survival.</p> <p>4.19. The proposed SDA development has also been designed to incorporate a green buffer, in accordance to criterion D of Policy H11. As outlined above, the scheme has been sensitively designed to incorporate large areas of open space and the building designs will be inspired by the adjacent residential uses. The building designs would be local vernacular but provide a distinct identity for the various neighbourhoods designed into the proposal.</p> <p>4.20. We fully support the requirement of this policy for the SDA scheme to provide a mix of housing types</p>
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		<p>and sizes in line with Paragraphs 47 and 50 of the NPPF, Policy CS3 of the HDC Core Strategy and Policy GS of the emerging Local Plan. The proposed SDA scheme would provide a mix of dwelling types and sizes, including bungalows, starter homes and family homes ranging in size from 2 to 5 bedrooms.</p>
	Policy ENV1	<p>4.21. In respect of Policy ENV1: Protection of Local Green Spaces we strongly disagree with the proposed designation of part of our site as Local Green Space. Local Green Space is a highly restrictive and significant policy designation that has been given equivalent status to Green Belt designation. Paragraph 77 of the NPPF is unambiguous in stating that Local Green Space designation is not appropriate for most green areas or open space, and as such it is considered entirely logical and reasonable that the allocation of any land in this manner should be underpinned by compelling evidence demonstrating its appropriateness.</p>
	Policy ENV3	<p>4.22. We have noted that the Neighbourhood Plan has been amended to include more details about the process that has been undertaken to arrive at the environmental site designation</p> <p>4.27. We fully support the protection of trees and woodland areas as outlined in Policy ENV3: Important Trees and Woodland in line with Paragraph 109 of the NPPF and Policy CS8 of the HDC Core Strategy. The proposed SDA development would provide a significant amount of planting and landscaping throughout the development area and the provision of public open space and green spines which would all contribute to the green infrastructure serving the Kibworths.</p>
	Community Action ENV1	<p>4.28. We fully support the objectives of Community Action ENV1 - Trees, Woodland Conservation and Habitat Creation in line with Paragraph 109 of the NPPF and Policy CS8 of the HDC Core Strategy. We would encourage the removal of the code ENV1 to assist with the functionality of the plan; the best course of action may be to incorporate the community action as part of Policy ENV3. As stated above, the proposed SDA scheme would provide a significant amount of planting and landscaping as well as the provision of public open spaces, which would make an important contribution to the Kibworths green infrastructure.</p>
	Community Action ENV2	<p>4.29. In line with Paragraphs 109 and 117 of the NPPF, and Policy CS8 of the HDC Core Strategy, we fully support the protection of biodiversity that is advocated by Policy ENV4: Biodiversity of the submission version of the Neighbourhood Plan. Initial investigations undertaken by ecology consultants EDP have suggested that the SDA scheme could provide significant opportunities for biodiversity enhancement. The scheme seeks to enhance local biodiversity through the provision of green 'spines' and a series of landscaping features such as trees, hedgerows and ponds.</p> <p>4.30. We fully support the objectives of Community Action ENV2: Biodiversity in line with Paragraphs 109 and 117 of the NPPF and Policy CS8 of the HDC Core Strategy. We would encourage the removal of the code ENV2 to assist with the functionality of the plan.</p>
	Policy ENV5	<p>4.31. With regards to Policy ENV5: Ridge and Furrow fields, we fully support the preservation of heritage</p>

		<p>assets, including ridge and furrow, in line with Paragraph 126 of the NPPF and Policy CS11 of the HDC Core Strategy. Preliminary investigations into the proposed development have recognised that there are designated and non-designated heritage assets located on the subject site. Significant consideration has been given to these assets when arriving at the proposed master plan and this has resulted in important heritage assets being incorporated into large areas of open space, in order to enhance their survival and protection.</p>
	Policy ENV7	<p>4.32. We fully support the principle of protecting important views as outlined in Policy ENV7: Protection of Important Views, in line with Paragraph 115 of the NPPF. However, whilst we appreciate and support the principle of this policy, we are highly concerned by the negative wording of its current format as it prevents any impact, even if it is positive. We would suggest that it should be amended to state:</p> <p>'New development will be required to preserve and enhance the identified locally important and valued views and skylines wherever possible. Proposals will be required to demonstrate that every effort has been made, and where it is proved that preservation is not possible, measures should be taken to mitigate or, as a last resort, compensate for any negative impact'</p>
	Community Action ENV4	<p>4.33. The proposed SDA scheme has given significant regard to its location and the resulting potential landscape impact. The proposal includes the creation of several green 'spines' which will retain the physical connection to the wider countryside landscape. The development will include the retention and enhancement of trees and hedgerows to create a complimentary interface between the proposal and its wider landscape.</p> <p>4.34. In respect of Community Action ENV4: Open Space, Sport and Recreation Sites, we fully support the provision of public open space in line with Policy CS8 of the NPPF. We would encourage the removal of the code ENV4 from the name to assist with the functionality of the plan. We would advise the Neighbourhood Plan group that the designation of land as OSSR is extremely restrictive to the development and as such any future designations to protect land should be underpinned by a robust evidence base. The proposed SDA scheme would provide up to 84 hectares of public open space, and as such could make a major contribution towards achieving the objectives of this community action.</p>
	Policy T1	<p>4.35. We fully support the requirement for new development to consider its impact on the wider highway network as outlined in Policy T1 : Location of New Housing, in line with Paragraph 30 and 35 of the NPPF and Policies CS1 and CS5 of the HOC Core Strategy. The proposed SDA scheme will provide a bypass which is anticipated to reduce the number of cars travelling through the villages by 50% by 2035. The masterplan has been designed to incorporate safe pedestrian and cycle routes which would provide connections throughout the new development and into the existing village.</p>
	Policy T2	<p>4.36. With regards to Policy T2: Access onto the A6, we fully appreciate the concerns the residents have regarding access onto the A6. The proposed SDA development would include the provision of a bypass which would reduce traffic that currently travels through the Kibworths. This would assist in improving</p>

		<p>connectivity to the existing A6 and further afield. The bypass would join the A6 with one roundabout to the north and one roundabout to the south east of the Kibworths, thus improve the ease of access for residents.</p> <p>4.37. We fully support the proposals to improve road safety as outlined in Policy T4: Improvements to Road Safety, in line with Paragraphs 30 and 35 of the NPPF and Policy CS5 of the HDC Core Strategy. The proposed SDA development would provide safe pedestrian and cycle access between the existing village and the wider landscape.</p> <p>4.38. With regards to Policy T5: Traffic Management, we fully support the desire to resolve the existing issues with the highways network in and around the Kibworths in line with Paragraphs 30 and 35 of the NPPF and Policy CS5 of the HOC Core Strategy. The proposed SDA scheme would provide a bypass around the north of Kibworth Harcourt and the downgrading of the A6 through the Kibworths. This is projected to reduce the levels of traffic travelling through the Kibworths by 50% by 2035.</p> <p>4.39. In respect of Policy T6: Air Quality, we fully support the objectives of improving Air Quality and reducing reliance on less sustainable forms of transport in line with Paragraphs 30 and 95 of the NPPF and Policies CS1 and CS5 of the HOC Core Strategy. As previously stated, the proposed SDA will provide a bypass which is anticipated to reduce the amount of traffic travelling through the Kibworths by 50% by 2035. In addition, the proposed scheme will provide safe pedestrian and cycle access between the new development and the existing villages, whilst there is also the potential to bring additional bus services through the subject site. These transport measures will collectively contribute to improving the air quality and the pedestrian experience for existing residents of the Kibworths.</p> <p>4.40. With regards to Policy E1: Primary Shopping Area, we fully support the provision of new retail development and the protection of existing retail uses in line with Paragraphs 23 and 28 of the NPPF and Policy CS6 of the HOC Core Strategy. The proposed SDA development scheme would provide 5 hectares of employment land which would provide the opportunity for roadside facilities that encourage a range of employment uses.</p> <p>5. Conclusion</p> <p>5.1. We consider that the proposal, the Kibworth North East Strategic Development Area, has the capacity to accommodate up to 1600 new homes, a 2 form entry primary school, local service centre, 5 hectares of employment land and 85 hectares of open space and a bypass, which will bring significant benefits to the Kibworths and the wider county.</p> <p>5.2. We fully support many of the objectives and policies contained within the Submission Draft document of the Kibworths Neighbourhood Plan. However, we do have some concerns relating to the identified housing</p>
	Policy T5:	
	Policy T6	
	Policy E1	

		<p>requirements and the designation of part of the proposed site as Local Green Space. The Neighbourhood Plan should have a degree of flexibility to assist in meeting current and future housing need in the District. At present HOC is unable to demonstrate a 5 year supply of deliverable housing land, and whilst the Kibworths have accommodated significant development in the past, it is likely that HOC will identify a minim of 'hundreds' of new homes to be delivered in the Kibworths (as per the recent HOC Local Plan Housing Options) .</p> <p>5.3. If hundreds of new homes are allocated to the Kibworths, which is likely if the Lutterworth and Scraftoft SDAs are selected and allocated as HDC's preferred options, these will be built on a piecemeal approach and will have a huge impact on the villages. It is unlikely that a piecemeal approach will deliver new services and therefore, existing services and facilities will be stretched to breaking point and the existing traffic problems faced by the Kibworths would only be exacerbated. There will be no benefits to arise from this. However, development at a scale of the Kibworth North East SDA would bring new homes as well as significant community benefits, including a bypass, employment opportunities, a new school and other community facilities.</p> <p>5.4. We would suggest that it may be beneficial to delay the adopt of the new Neighbourhood Plan until Harborough District Council has had adequate opportunity to review and scrutinise its housing requirements, to reflect the updated OAHN that has been included in the HEDNA report released in January 2017. Furthermore, we consider it desirable for the Parish Councils to allocate a possible reserve site for housing, which would allow the community a degree of control over any potential future housing requirement.</p> <p>5.5. Furthermore, we strongly disagree with the inclusion of part of the site as Local Green Space. The designation of land in this manner is highly restrictive and is equivalent to a Green Belt allocation. As such, we consider it entirely reasonable that any allocation of land in this manner is to be underpinned by extensive and robust evidence. We believe that the Environmental Inventory provided as part of the Neighbourhood Plan does not constitute a robust evidence base because there is no explanation of justification for any of the scores provided and why this leads to a valid LGS designation. Regardless of this, given that Harborough District Council has not confirmed which of the strategic options for residential development it is seeking to pursue, allocating the land as LGS would undermine the local planning process by restricting the available land for meeting the District's housing needs. This is despite Neighbourhood Plans having a very clear mandate about the required compliance with the strategic objectives and policies of national and local planning.</p> <p>5.6. We are also pleased that the Parish Councils have elected to include a specific SDA policy in the Draft Plan. We believe that it is important that the residents of Kibworth have the opportunity to influence the future SDA development and this policy does that. However, we do have some concerns about the requirement for any future SDA scheme to provide a bypass prior to any development. We believe that it is an unrealistic and unviable requirement for any developer, and therefore we are proposing a phased bypass development that</p>
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		<p>coincides with phasing of the SDA scheme as a whole.</p> <p>5.7. Andrew Granger and Co. would like to remain involved throughout the Kibworth Neighbourhood Plan process and therefore request to be informed of any future consultation stages and when the document is submitted for examination.</p> <p>Appendix 1</p> 
Environment	Policy	Whilst the EA welcomes the inclusion of this Policy we wish to clarify that the sequential

Agency	ENV11 Watercourses and flooding	test does not apply to developments over 1 hectare in size.
Marrons Planning Ltd	Policy ENV1	<p>1. INTRODUCTION</p> <p>1.1 These representations to The Kibworths' Neighbourhood Plan (Submission Version) have been produced by Marrons Planning on behalf of David Wilson Homes East Midlands in relation to the company's land interests at Longbreach Road.</p> <p>1.2 The document provides comment on the following aspects of the Plan:</p> <ul style="list-style-type: none"> • Policy ENV1: Protection of Local Green Spaces • Policy ENV2: Protection of Other Sites of High (Natural and Historical) Environmental Significance <p>1.3 The representations should be read in conjunction with representations submitted on behalf of David Wilson Homes to the Pre-Submission Neighbourhood Plan in January 2017 (Appendix 1). Our previous comments in relation to the approach to housing development in Kibworth, and the need to conform with the strategic policies of the emerging Harborough Local Plan continue to apply.</p> <p>2. POLICY ENV1: PROTECTION OF LOCAL GREEN SPACES</p> <p>2.1 David Wilson Homes' land interest at Longbreach Road is covered by a proposed Local Green Space designation (NP site reference 030, Tin Bridge Paddock).</p> <p>2.2 The site is currently the subject of a planning appeal. Following the Inspector's site visit on 4 April 2017, the decision is expected imminently. If the Inspector was to allow the appeal and grant planning permission, the Local Green Space (LGS) designation would need to be deleted from the Plan. Planning permission for residential development is not compatible with the LGS designation and in such circumstances, the Planning Practice Guidance makes clear that "Local Green Space designation will rarely be appropriate where the land has planning permission for development" (Open space, sports and recreation facilities, public rights of way and local green space, paragraph: 008 Reference ID: 37-008-20140306).</p> <p>2.3 Our previous representations concluded that the Longbreach Road site did not warrant a LGS designation on the basis that the site was not demonstrably special as required by paragraph 77 of the National Planning Policy Framework. As such, the Neighbourhood Plan was not considered to meet the basic conditions of having regard to national policies and advice or contributing to the achievement of sustainable development. Having reviewed the Submission Neighbourhood Plan, it is still considered that the designation is proposed as a means simply to prevent development of the site for housing, and that the designation results</p>

		<p>in the Neighbourhood Plan failing to meet a number of the basic conditions.</p> <p>2.4 The Pre-Submission representations commented that the scoring set out in the Environmental Inventory was not robust, on the basis that there was no explanation as to how the scoring had been undertaken or what a site must achieve to be awarded a particular score (Appendix 1, paragraph 2.8). It is noted that the narrative in the Environmental Inventory has not been updated to provide any further justification of the scoring.</p> <p>2.5 The Submission version of the Neighbourhood Plan includes an additional table on page 73 which explains the scoring in slightly more detail. David Wilson Homes still has concerns with the methodology and scoring in the Environmental Inventory, and how this has led to the Longbreach Road site being identified as a LGS.</p> <p>2.6 Paragraph 77 of the NPPF is the key guidance for Local Green Spaces. It states that the designation should only be used:</p> <ul style="list-style-type: none"> • Where the green space is in reasonably close proximity to the community it serves; • Where the green area is demonstrably special to a local community and holds a particular significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and <p>Where the green area concerned is local in character and is not an extensive tract of land.</p> <p>2.7 Within this context, David Wilson Homes has the following concerns with the general methodology and site scoring.</p> <p>Accessibility</p> <p>2.8 Accessibility has been chosen as a criterion against which to assess the sites. However, there is arguably some overlap with the recreation category. Furthermore, whether or not a site has public access is immaterial, as confirmed in the Planning Practice Guidance(Open space, sports and recreation facilities, public rights of way and local green space, Paragraph: 017 Reference ID: 37-017-20140306). In any event, should this criterion be viewed by the LPA as reasonable, it should be noted that Longbreach Road has been awarded a score of 2 (out of a possible 4) despite there being no public access within the site boundary or any plans to confer rights of access in the future.</p> <p>Special to Community</p> <p>2.9 The generic 'special to community' criterion is not considered to be necessary. Paragraph 77 provides examples of what makes sites demonstrably special; its beauty, historic significance, recreational</p>
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		<p>value, tranquillity or richness of wildlife, all of which are covered in the Environmental Inventory.</p> <p>2.10 In any event, the Longbreach Road site has been awarded 4 points (out of a possible 4). Figure 5 of the Neighbourhood Plan shows residents' identification of important open space (blue dots) and views (green dots). There is no further justification about what makes this site special to the community. This is in contrast to the Landscape Summary which accompanied the planning application for the site, and concluded:</p> <p>There are no views to or from the site identified in guide books or on maps. There are no local facilities provided to specifically enjoy views to or from the site, or views within which the site forms a key element or setting to a notable feature. There are no views to or from the site that are specifically reference in art or literature. The visual setting of the site cannot be considered as being of high value, and the site cannot be considered as providing a critical or important element to the setting of the landscape or settlement (Appendix 2, paragraph 3.16)</p> <p>2.11 Furthermore, the dots on Figure 5 show that the vast majority of open space within and adjoining the settlement is considered by the community to be special. In this regard, this exercise does not demonstrate that Longbreach Road is any more or less special than a large number of sites in the village, and the fact that a site is merely undeveloped is not sufficient to make it demonstrably special in the context of NPPF paragraph 77.</p> <p>Recreation</p> <p>2.12 Longbreach Road is awarded 2 (out of a possible 4) points. The notes on page 73 of the Plan state that this means "actual or potential, everything from kick-about dog walking to Forest School use and Public Open Space." There is no public access to the site meaning it cannot be used for any of the above purposes. The reference to 'potential' use is not considered relevant, as the landowner has no intention to confer public access rights if the site is prevented from being developed for housing, and a LGS designation will not "confer any rights of public access over what exists at present" (Planning Practice Guidance, Open space, sports and recreation facilities, public rights of way and local green space, Paragraph: 017 Reference ID: 37-017-20140306). The site should not be awarded any points under this criterion.</p> <p>Beauty</p> <p>2.13 The site is awarded 1 point (out of a possible 2). It is not clear why sites can only score a maximum of 2 points compared to 4 under most other categories. The notes on page 73 indicate that the consultation map results are used to justify the scoring in this regard. No further justification is given. Our previous comments (Appendix 1, paragraphs 2.10 to 2.12) apply; it is not accepted that the site can be regarded as demonstrably special because of its beauty, and a lower score should be considered.</p>
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		<p>Tranquility</p> <p>2.14 The site is awarded 2 (out of a possible 2) points. Again, it is not clear why sites can only score a maximum of 2 points compared to 4 under most other categories. The notes on page 73 confirm this is subjective, but no further justification in the Plan or the supporting documents can be found. Our previous comments (Appendix 1, paragraph 2.20) apply; it is not accepted that the site can be regarded as demonstrably special from a tranquility perspective and a lower score should be considered.</p> <p>Richness of Wildlife</p> <p>2.15 The site is awarded (3 out of a possible 4) points. The notes on page 73 indicate that points are awarded in respect of "richness of species and habitats (Priority BAP spp Priority habitats relevant existing designations (Habitat Survey, Local Wildlife Sites / site of geological / industrial / history significance)." There is no justification of what criteria the site has to meet in order to be awarded 3 points.</p> <p>2.16 Our previous comments in respect of ecology apply (Appendix 1, paragraphs 2.21-2.22). The site does not contain any statutory or non- statutory designated sites of conservation value, and in there have been no objections to the development of the site for housing from Leicestershire County Council's ecologist. As such, the site should not be regarded as being demonstrably special from a wildlife perspective.</p> <p>Historic Significance</p> <p>2.17 The site is awarded 2 (out of a possible 4) points. The notes on page 73 indicate that points are awarded in respect of "extant, visible evidence, number of periods/features/records etc, relevant existing designations (Historic Environment Records)." It is worth noting that a desk based archaeological assessment was not required to support the planning application at the site, with the county archaeologist confirming that "we are satisfied that any remains present area unlikely to be of such significance to warrant preservation in situ" (Appendix 3). Our previous comments in respect of historic significance apply (Appendix 1, paragraphs 2.13-2.16).</p> <p>3. POLICY ENV2: PROTECTION OF OTHER SITES OF HIGH (NATURAL AND HISTORICAL) ENVIRONMENTAL SIGNIFICANCE</p> <p>3.1 The site is still shown on Figure 8 as an 'other site of high environmental significance' despite not being listed in the accompanying Policy ENV2. This is unclear and ambiguous and could lead to confusion in interpreting the Plan. The site should be removed from Figure 8, as set out in our representations to the Pre-Submission Plan.</p> <p>4. SUMMARY AND CONCLUSIONS</p> <p>4.1 These representations set out objections to the Submission Neighbourhood Plan, on behalf of David</p>
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		<p>Wilson Homes. The representations conclude:</p> <p>Sufficient evidence is not provided to justify the Local Green Space designations for land at Longbreach Road (Site reference 030). Whilst an additional table has been added at page 73 of the Submission Plan, this is not considered to provide sufficient detail on the scoring of sites which has led to the identification of sites as Local Green Spaces. No additional description or evidence has been provided in the Environmental Inventory to address our comments as part of the Pre-Submission consultation. As such, the policies are not considered to be supported by "appropriate evidence" as required by national policy (Planning Practice Guidance, Paragraph: 041 Reference ID: 41-041-20140306)</p> <ul style="list-style-type: none"> • The site cannot be regarded as demonstrably special in line with NPPF paragraph 77. • The site continues to be identified on Figure 8 as a Site of High Environmental (Natural and Historical) Significance as well as a Local Green Space which leads to the Plan being ambiguous and unclear. • By designating Longbreach Road (030) as a Local Green Space, The Kibworths' Neighbourhood Plan is in danger of failing to meet two of the basic conditions: having regard to national policies and advice and contributing to the achievement of sustainable development (as set out in the Pre-Submission representations at Appendix 1). <p><u>Appendix 1</u></p> <p><u>Representations to The Kibworths' Neighbourhood Plan (Pre- Submission Version)</u></p> <p>1. INTRODUCTION</p> <p>1.1 This report has been produced by Marrons Planning on behalf of David Wilson Homes East Midlands in relation to their land interests at Longbreach Road, Kibworth.</p> <p>1.2 This document provides comment on Policy ENV1, H1 and Figure 8. The main purpose of these representations is to set out David Wilson Homes' objections to the proposed designation of the Longbreach Road site as a Local Green Space.</p> <p>2. POLICY ENV1: PROTECTION OF LOCAL GREEN SPACES</p> <p>2.1 Our client, David Wilson Homes, has a legal interest in Land at Longbreach Road, which has been identified in the Plan as a proposed Local Green Space site (referred to as Tin Bridge Paddock, site reference 030). A planning application for the erection of 18 dwellings was submitted by David Wilson Homes in 2015, with the intention that it would form an additional phase of the committed scheme to the west of the site (Local Plan Allocation KB1, which will provide for 522 dwellings. This planning application was refused by Harborough District Council on 8 June 2016. A planning appeal against this decision was lodged by David</p>
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		<p>Wilson Homes on 10 November 2016 and will be determined by the Planning Inspectorate in due course.</p> <p>2.2 Notwithstanding the above planning application history, it is David Wilson Homes' position that the designation of the site as a Local Green Space would result in the Neighbourhood Plan failing to meet a number of the basic conditions which are required for the Neighbourhood Plan to be able to proceed to referendum.</p> <p>2.3 These basic conditions are set out at paragraph 8 (2) of Schedule 4B to the Town and Country Planning Act 1990 (as applied to Neighbourhood Plans by section 38A of the Planning and Compulsory Purchase Act 2004) and the Kibworth Neighbourhood Plan will need to fully meet these conditions in order to proceed to the referendum stage of the process.</p> <p>Regard to National Policies and Advice</p> <p>2.4 One of the basic conditions is that the Neighbourhood Plan must have "regard to national policies and advice." The Planning Practice Guidance makes clear that a Neighbourhood Plan "must not constrain the delivery of important national policy objectives" (Paragraph: 069 Reference ID: 41-069-20140306). The Governments' planning policy on Local Green Spaces and how this is expected to be applied is contained in the National Planning Policy Framework (the Framework).</p> <p>2.5 Paragraph 76 of the Framework confirms that a Local Green Space designation affords protection consistent with policy for Green Belts (ruling out new development other than in very special circumstances). It is therefore imperative that Local Green Space designations are robust, and are not made simply as a means to prevent development, which is considered to be the case in this instance.</p> <p>2.6 The key guidance on Local Green Spaces is contained at paragraph 77 of the Framework. This confirms that (our emphasis):</p> <p>The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</p> <ul style="list-style-type: none"> • Where the green space is in reasonably close proximity to the community it serves; • Where the green area is demonstrably special to a local community and holds a particular significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and • Where the green area concerned is local in character and is not an extensive tract of land.
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		<p>2.7 David Wilson Homes does not dispute that Site 030 is in reasonably close proximity to the community it serves. Similarly, it is agreed that the site is local in character and is not an extensive tract of land. However, it is not considered that the site meets the 'demonstrably special' test, for the reasons set out below.</p> <p>2.8 The Neighbourhood Plan is supported by an Environmental Inventory. This scores the site against a number of criteria, awarding 0-4 marks within each category. This evidence is not considered to be robust. There is no explanation as to how the scoring has been undertaken, or what a site must achieve to be awarded a particular score. In addition, there is no explanation on how the 'bounded' category relates to paragraph 77 or how the 'special' category is distinguishable from the 'beauty', 'tranquillity', 'history' or 'wildlife etc.' categories, which paragraph 77 cites as examples of what could make a site demonstrably special.</p> <p>2.9 Without further clarification, no comment on the scoring of sites can be made at this stage. However, the following sections will set out why the 030 site should not be considered demonstrably special, with references to the examples set out in paragraph 77.</p> <p>Beauty</p> <p>2.10 The site comprises rough grassland which is clearly common, widespread and not rare or irreplaceable. The features of the site are clearly not representative of a well maintained landscape in good condition. The 'Landscape Summary' Report submitted with the planning application (provided as Appendix 1) states that the landscape quality of the site is low and one that cannot be described as highly appealing.</p> <p>2.11 As part of the application process, the Council sought an independent landscape review of the site and proposals by the 'The Landscape Partnership' (provided as Appendix 2). This also confirms that the site is of little visual value, stating "the site, particularly in its current unmanaged condition, is not of the highest value" (paragraph 4.2). The report does not conclude that the site is remarkable, or of particular importance in landscape terms, which as a result should be protected in its own right.</p> <p>2.12 The site cannot therefore be regarded as being demonstrably special because of its beauty.</p> <p>Historic Significance</p> <p>2.13 The Neighbourhood Plan includes a lengthy description describing the history of Kibworth Beauchamp and Kibworth Harcourt (pages 7-29). This is clearly the part of the Neighbourhood Plan within which 'demonstrably special' facets of the village are described. The David Wilson Homes site is not referred to in this section of the plan, and it is assumed that if the site was considered to be historically significant, it would have been referenced in detail at this part of the plan.</p> <p>2.14 The accompanying Environmental Inventory does make reference to the site being "west of and visible from footpath 85 (which follows the early medieval track from Smeeton Westerby to Kibworth</p>
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		<p>Harcourt)", and therefore, appears to be attributing some historic significance to the site. The Landscape Summary Report includes photographs from a number of viewpoints along footpath B5 and concludes that "the private nature of the site means it makes a limited contribution to the setting or the surrounding landscape and settlement' (paragraph 3.25).</p> <p>2.15 Reference is also made in the Environmental Inventory to the site formerly being part of a "highly valued green wedge preserving the medieval (or older) separation between the two Kibworths." The 'Landscape Summary' Report makes clear that the site does not adjoin or contain any recognised heritage assets, and as a result, clearly does not provide visual setting to such assets. Further, the site is not designated as Green Wedge or recognised at any policy level as having historical significance. This is confirmed by the fact the site is an unmanaged, inaccessible parcel of land between the development being constructed to the west and the attenuation features associated with that development to the east.</p> <p>2.16 The site cannot therefore be regarded as being demonstrably special because of its historic significance.</p> <p>Recreational Value</p> <p>2.17 There is no public access to the site. A Public Right of Way (PRoW) will be provided to the south of the site as part of the approved David Wilson Homes development. However the provision of this footpath will not result in public access being made available to the site itself, which will be fenced off.</p> <p>2.18 Furthermore, the site is not part of any leisure or recreational asset, and was rejected as an Asset of Community Value by Harborough District Council, who confirmed:</p> <p>"The site should not be listed as an Asset of Community Value. Land is an asset of community value if its main use has recently been or is presently used to further the social wellbeing or social interests of the local community and could do so in the future. The Localism Act states that "social interests" include cultural, recreational and sporting interests. The current use of the site appears to be for grazing, and no evidence is given of current or recent use for social interests or social wellbeing".</p> <p>2.19 The site cannot therefore be regarded as being demonstrably special because of recreational value.</p> <p>Tranquillity</p> <p>2.20 The site is situated next to the East Midlands Mainline and within close proximity to a skate park. Furthermore, a primary school, playing fields and public open space are also located in the vicinity of the site</p>
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		<p>which would create a level of noise disturbance. A noise assessment was submitted as part of the planning application and demonstrated that the proposed housing development for 18 dwellings, could be designed to satisfactorily ameliorate the effects of intermittent train noise and the occasional skate park noise experienced at the site. However, because of these nearby noise sources, the site cannot be regarded as being demonstrably special from a tranquillity perspective.</p> <p>Richness of the Wildlife</p> <p>2.21 An ecological appraisal was submitted as part of the David Wilson Homes planning application (provided as Appendix 3). This confirms that the site does not contain any statutory or non-statutory designated sites of nature conservation value. Mitigation measures including new native boundary planting and bird and bat boxes are proposed.</p> <p>2.22 The site should not be regarded as being demonstrably special from a wildlife perspective.</p> <p>'Important Open Land' Designation</p> <p>2.23 The site is designated as 'Important Open Land' (Policy HSI9) in the Harborough Local Plan (2001). The Parish Council may consider that this designation makes the site demonstrably special and thereby justifies the Local Green Space designation. However, the following points undermine the Important Open Land Designation and demonstrate that the site should not be considered as special in this regard:</p> <ul style="list-style-type: none"> • Paragraph 5.11 of the Committee Report for the planning application confirms that the Council has no intention of carrying the policy forward in the new Local Plan; • The policy is time expired; • As confirmed in the Landscape Summary Report, the boundaries of the HS/9 designation are well defined by the school site and surrounding settlement, and whilst the land is open (in the sense that it has not been developed) there is no evidence to justify the designation or to confirm that the designation was not simply just drawn to cover land that remained between allocation KB/1 and the built form of the settlement, regardless of its function, character or the contribution it made to the setting of the settlement. • The Council commissioned 'The Landscape Partnership Report' confirms that there is no supporting evidence base for Policy HS/9 <p>Contributes to the achievement of sustainable development</p>
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		<p>2.24 A further basic condition is that Neighbourhood Plans should contribute towards the achievement of sustainable development.</p> <p>2.25 The Planning Practice Guidance makes clear that in order meet this condition, "sufficient and proportionate evidence should be presented on how the draft neighbourhood plan guides development to sustainable solutions." Qualifying body must also demonstrate how the plan "will contribute to improvements in environmental, economic and social conditions" (Paragraph: 072 Reference ID: 41-072-20140306).</p> <p>2.26 The policies in paragraphs 18 to 219 of the National Planning Policy Framework, taken as a whole, constitute the Government's view of what sustainable development in England means in practice for the planning system. This includes paragraph 77. Without a sufficient and proportionate evidence base to support the proposed LGS designation of site 030 in line with the policy requirements of NPPF paragraph 77, the Neighbourhood Plan cannot be considered to contribute towards sustainable development.</p> <p>2.27 In this context, the District Council has carried out its own assessment of Local Green Space in 2014. The site was not considered as part of that process, presumably as it was considered by the District Council not to meet the required tests of the Framework. In addition, it should be noted that adjoining land to the east was submitted, but again considered unsuitable for allocation as Local Green Space as part of the Local Plan.</p> <p>2.28 In summary, David Wilson Homes objects to the designation of site 030 as a Local Green Space, on the basis that it does not have regard to NPPF paragraph 77 nor should it be regarded as contributing to the achievement of sustainable development. The Neighbourhood Plan thus fails to meet the basic conditions and should not be proceed to referendum or be made in its current form. The LGS designation of site 030 should be deleted.</p> <p>3. POLICY H1: HOUSING PROVISION</p> <p>3.1 It is stated in Policy H1 that the Kibworths have exceeded its housing requirement over the plan period, and as a result, further housing development in the Parish will be restricted to windfall development in line with Policy H2.</p> <p>3.2 The housing requirements across Harborough District will be tested as part of the emerging Local Plan. The proposed requirement for Kibworth has not yet been confirmed, and once it has, will also need to be tested by a Planning Inspector. It is one of the basic conditions that a Neighbourhood Plan should be in general conformity with the strategic policies contained in the development plan. As such, David Wilson Homes agrees with the flexibility incorporated into the Neighbourhood Plan, which confirms that the Neighbourhood Plan will be reviewed if there is an increase in housing need across the District or if there is a failure to deliver the commitments already identified.</p>
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		<p>4. FIGURE 8: OTHER SITES OF HIGH ENVIRONMENTAL (NATURAL AND HISTORICAL) SIGNIFICANCE</p> <p>4.1 Our client has a legal interest in Site reference 030. However, the site is also shown on Figure 8 as a 'site of natural or historical significance and community value'. As site 030 is not referenced in Policy ENV2 and is proposed in Policy ENV1 as a Local Green Space, we presume its inclusion in Figure 8 is an error. To avoid confusion, the site should be removed from Figure 8 accordingly.</p>
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		Landscape Summary Report – Golby and Luck
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		<p>1 INTRODUCTION</p> <p>1.1 This landscape summary has been carried out by Golby + Luck Landscape Architects following instruction by David Wilson Homes East Midlands to review the land to the east of Longbreach Road, Kibworth. This review takes into consideration the landscape planning context of the site; the setting of the site within the settlement; and its function as open land. This in turn is used to inform an understanding of the value of the site that includes the value of its features and physical state; its contribution to the setting of the settlement; and its function as amenity space enjoyed by the public.</p> <p>1.2 The following summary is guided by techniques and guidelines set out in the Guidelines for Landscape and Visual Impact Assessment - Third Edition (2013), published by the Landscape Institute and Institute of Environmental Management and Assessment (GLVIA) but this is not a formal assessment or appraisal following a prescribed methodology.</p> <p>1.3 In the production of this summary reference has been made to the following documents and information:</p> <ul style="list-style-type: none"> ▪ Planning Committee Report for application 15/00747/FUL (August 2015) ▪ National Planning Policy Framework 2012 (NPPF); ▪ Harborough District Council Saved Local Plan (2007); ▪ Harborough District Local Development Framework Core Strategy 2006-2028 (2011); ▪ Harborough District Council - Harborough Rural Centres Landscape Character Assessment and Capacity Study (2014); ▪ British Listed Buildings online resource (http://www.britishlistedbuildings.co.uk/map); ▪ DEFRA MAGIC online environmental database (http://magic.defra.gov.uk/MagicMap.aspx); ▪ Historic England - The National Heritage List for England (http://list.historicengland.org.uk/mapsearch.aspx); ▪ Ordnance Survey information Explorer 1:20,000 and Street Plus 1:10,000; and ▪ Google Earth aerial photography.
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2 SITE CONTEXT AND DESCRIPTION

- 2.1 The site covers approximately 0.83 hectares of rough and unmanaged grassland to the east of Longbreach Road, Kibworth. The site is bound to the south by the mainline railway, to the west by the emerging KB1 housing development site, to the north by public open space and a skateboard park, and to the east by public open space that accommodates the storm water attenuation pond to the KB1 housing site to the west.
- 2.2 The boundaries of the site are defined by strong native hedgerows to the north, east and west; and fragmented vegetation at the boundary with the railway to the south. The western and eastern boundary hedgerows are fragmented at their southern extents as gaps have been created to provide access into the KB1 housing site beyond.
- 2.3 The land appears to have once been farmed as pasture but now presents as unmanaged and abandoned land.
- 2.4 In summary the site:
- Is privately owned and does not provide any public access;
 - Does not contain or adjoin any recognised heritage assets;
 - Is not designated for ecological or wildlife interests;
 - Is designated as Important Open Land under saved policy HS/9 of the Harborough District Council Saved Local Plan (2007)
- 2.5 Whilst the saved Local Plan is now old its policies are still part of the development plan for the District. However, a key element of this site is the changes to its context and setting since the allocation and subsequent development of the KB1 housing site, and changes to its physical state following the abandonment of farming practices. The designation of Important Open Land made under policy HS/9 has not been reviewed in recent years and therefore the current landscape baseline not taken into consideration. This does not make the policy out of date per se, but clearly the function of the site and the contribution the land makes to the open character of the landscape and settlement will have changed.
- 2.6 The KB1 housing site has effectively severed the site and surrounding policy HS/9 land from the wider countryside to the west to create a network of public amenity space and

		<p>private farmland between the settlement and railway line. The land covered by the HS/9 has four somewhat distinct characters:</p> <ul style="list-style-type: none"> ▪ Open amenity land comprising sports pitches and regularly mown amenity grassland (that includes the grass pitches associated with Kibworth Primary School); ▪ Small, compartmentalised, and relatively well contained fields of rough grassland and pasture; ▪ An area of storm water attenuation comprising native amenity planting, rough grassland and open water with emergent vegetation; and ▪ A small partially wooded area to the east, south of The Tithings <p>2.7 The boundaries of the HS/9 land is well defined by the school site and surrounding settlement, and whilst this land is open (in the sense that it is has not been developed) there is no evidence to confirm otherwise that this designation was not simply just drawn to cover the land that remained between the KB/1 housing site and built-form of the settlement, regardless of its function, character, or the contribution it made to the setting of the settlement.</p> <p>2.8 In terms of access, the land beyond the site to the north and east is publically accessible through the existing network of footpaths. PRoW B5 passes alongside the eastern boundary of the site between the Kibworth Primary School and Meadow Brook Road to the south. This section of pathway crosses the mainline railway via a stepped bridge crossing with solid wrought iron balustrades. PRoW B5 continues west from the school across the public playing field to the north of the site connecting with public car park at Barnards Way. PRoW B4 extends along the southern boundary of the school site connecting with PRoW B1 to the east that connects between Hillcrest Avenue to the north and School Walk to the south beyond the railway line. To the east of the site PRoW B100 crosses diagonally between PRoW B4 and B1 connecting with the play area that sits at the south-east corner of the policy HS/9 land. To the west of the site a tarmac cycleway extends between PRoW B1 and B5 running to the south of the storm water attenuation pond.</p>
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3 LANDSCAPE ISSUES

3.1 To determine whether or not the land within the site is 'important' to the open character of the landscape and setting of the settlement it is necessary to understand it's value both in landscape and visual terms. The Guidelines for Landscape and Visual Impact Assessment sets out a range of factors that can help in the identification of valued landscapes (GLVIA Box 5.1 page 84). These include:

- Landscape quality (condition);
- Scenic quality;
- Rarity;
- Representativeness;
- Conservation Interests;
- Recreation Value;
- Perceptual Aspects; and
- Associations.

3.2 In terms of landscape quality, the features of the site are clearly not representative of a well maintained landscape in good condition. The surrounding landscape and settlement is also varied both in terms of character and quality. The landscape quality of the site is low value, with the surrounding landscape considered to be of medium to low value. This is not a high quality landscape.

3.3 In terms of scenic quality, this is not a landscape that can be described as highly appealing to the senses. It presents as fragmented and compartmentalised fields at the edge of the settlement with a varied character and some detracting features.

3.4 In terms of rarity, the features of the site are clearly both common and widespread in the and around the landscape associated with the settlement. The development proposals can and will retain the boundary vegetation resulting in the primary loss of rough grassland that is not rare or irreplaceable.

3.5 In terms of conservation interest, the site is of limited value and this is reflected by the lack of any ecological, heritage, or archaeological objection to the application.

		<p>3.6 In terms of recreation value, the site is private land and does not provide any access or recreation value. The development of the site may change the visual setting of the neighbouring open space but this will have no effect on this land as open space or the public enjoyment of this space.</p> <p>3.7 In terms of perceptual aspects, the site is bound by settlement (existing and emerging), a skateboard park and mainline railway. The site and surrounding landscape are clearly not valued for notable wildness or tranquility qualities.</p> <p>3.8 In terms of associations, there is no evidence to suggest that the site has any strong or valued cultural associations.</p> <p>3.9 In addition to landscape value it is also important to consider whether the site plays a key function or role in the landscape. It is clear that the site does not serve a critical function in separating settlements or maintaining settlement character and identity. The site does not contribute to the setting of any notable features, such as heritage assets or view lines towards landmarks or notable buildings. The site is not part of a leisure or recreation asset. The site clearly does not provide a critical function or role in the landscape.</p> <p>3.10 This in part was recognised by the recent rejection of the site as an Asset of Community Value and the fact the site and adjoining land to the east was not considered as Local Green Space, and subsequently reject from this definition proposal. The justification for its rejection as an Asset of Community Value states:</p> <p><i>"The site should not be listed as an asset of community value. Land is an asset of community value if its main use has recently been or is presently used to further the social wellbeing or social interests of the local community and could do so in the future. The Localism Act states that "social interests" include cultural, recreational and sporting interests. The current use of the site appears to be for grazing, and no evidence is given of current or recent use for social interests or social wellbeing."</i></p> <p>3.11 Understandably, there was no evidence given of current or recent use for social interest or wellbeing as the site has been under long-term private ownership being maintained as farmland.</p> <p>3.12 In landscape terms the site cannot be considered as being of high value, and does not make a critical or important contribution to the features or character of the settlement or surrounding landscape.</p>
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		<p>3.13 In visual terms the GLVIA also sets out criteria for assessing the value of views (GLVIA paragraph 6.37, page 114). It is recognised that understanding value is one part of the process of assessing the significance of visual effects but for the purposes of this review it is considered relevant to provide an understanding of the value attached to the visual setting of the site.</p> <p>3.14 The GLVIA is clear that judgements of value attached to a view should be guided by:</p> <ul style="list-style-type: none"> ▪ Recognition of heritage assets; ▪ Recognition of planning designations; ▪ Identification in guide books or on maps; ▪ Through provision of facilities to enjoy the view such as seating, signs, interpretation; or ▪ Reference to particular views in literature or art. <p>3.15 The site clearly does not provide the visual setting to any heritage assets or landscapes specifically designated for their natural beauty or special qualities (such as National Parks, Areas of Outstanding Natural Beauty, and Areas of Particularly Attractive Countryside). The site is designated under policy HS/9 as Important Open Space. The subtext to this policy clearly states that “quality, extent and use” of these areas varies. The policy is primarily concerned with the protection of the “open character of the land” and therefore can be interpreted as a functional planning policy rather than a policy designation seeking to protect a landscape of consistently high quality and value.</p> <p>3.16 There are no views to or from the site identified in guide books or on maps. There are no local facilities provided to specifically enjoy views to or from the site, or views within which the site forms a key element or setting to a notable feature. There are no views to or from the site that are specifically reference in art or literature. The visual setting of the site cannot be considered as being of high value, and the site cannot be considered as providing a critical or important element to the setting of the landscape or settlement.</p> <p>3.17 As part of this review a series of representative views have been provided, see GL0488 02 and 03. Taking each view in turn:</p> <p>3.18 Views 1 and 2 are both taken from the PRow B5 in the open space to the north of the site approximately 45m and 35m from the site respectively. Both views illustrate the</p>
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		<p>fragmented and compartmentalised character of the landscape in this location, and whilst there is an open appreciation of the immediate amenity space there is a limited appreciation of the site. Whilst at present the settlement is not apparent the completion of the KB/1 site will mean that the site is viewed in the immediate context of housing development and will therefore not result in the introduction of a new or visually discordant landscape element.</p> <p>3.19 View 3 is taken from PRoW B4 in the open space to the north-east of the site. Again this view illustrates the fragmented nature of this landscape with the tall boundary hedgerows compartmentalising the fields and restricting any open appreciation of the wider landscape setting that includes the site. There will be a channelled view of the site (and the development) that is likely to become more apparent in winter. However, this will not significantly change the setting or visual character of this space.</p> <p>3.20 View 4 is taken from PRoW B5 at the eastern boundary of the site. This view clearly illustrates the varying character and quality of the landscape surrounding the site, and again shows the contained setting of each individual field. The tall hedgerow at the eastern boundary of the site will soften and filter views of the development, and whilst the housing will be apparent within the site it will not significantly detract from the open appreciation of the landscape associated with this field and the attenuation pond.</p> <p>3.21 View 5 is taken from the cycleway to the south of the attenuation pond approximately 60m from the site looking west. Following the completion of the KB/1 site the backdrop to the site will be almost entirely defined by modern housing development. The housing within the site will be clearly visible but it will be set in the context of existing modern development. Therefore, not introducing a new or visually discordant element into this landscape, and unlikely to significantly affect the setting of views from the cycleway.</p> <p>3.22 View 6 is taken from PRoW B5 at the railway footbridge. This is a view restricted to the section of bridge at the top of the steps. Whilst both the site and adjoining field are visible the view again illustrates the varied character of the landscape and fragmented and compartmentalised nature of the fields that do not read as an open flowing landscape providing a high quality setting to the settlement. Views of the settlement are captured and following the completion of the KB/1 housing site the backdrop to the site will be defined by modern housing. The development of the site will be clearly visible but set within the backdrop of the KB/1 site. To the east the fields will remain open retaining a landscape setting to the site and settlement. Whilst the open land within the site will be lost the development it will not introduce a new or visually discordant landscape element</p>
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		<p>and is unlikely to result in unacceptable harm to the visual setting of the landscape or settlement.</p> <p>3.23 The visual setting of the site and surrounding landscape is not of high value and whilst the development will result in the loss of open land within the site it is clear that this is not critical or important to the visual character of the surrounding landscape and settlement.</p> <p>3.24 The landscape of the site and its immediate surroundings cannot be considered wholly different in landscape and visual character to the land to the south of the mainline railway, set between Warwick Road and Gladstone Street. This area of landscape was recently assessed on behalf of the Local Authority by an independent Landscape Architect and found to have a high and medium/high capacity to accommodate change in the form of residential development (see Harborough District Council - Harborough Rural Centres Landscape Character Assessment and Capacity Study (2014)). There is no up to date evidence produced by the Local Authority to suggest that the landscape associated with the site is highly valued, or that the landscape capacity of the site would be different to land with a similar character and appearance associated with the settlement to the west.</p> <p>3.25 In summary:</p> <ul style="list-style-type: none"> ▪ This landscape summary has clearly demonstrated that regardless of the historic policy designation of Important Open Space the landscape associated with the site and its local setting cannot be considered as being of high landscape or visual value; ▪ This has in part been demonstrated by the rejection of the site as an asset of community value, and through the rejection of the site as a Local Green Space; ▪ The site has no notable heritage, wildlife, or ecological value, confirmed by the lack of any objection on these grounds; ▪ The site is in effect trapped land set between the railway, settlement, and emerging KB/1 site with evidence on site to suggest that any former farming practice has been abandoned; ▪ The site and surrounding landscape is fragmented and compartmentalised, and this combined with private nature of the site and lack of any public access
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		<p>means that it makes a limited contribution to the setting of the surrounding landscape and settlement;</p> <ul style="list-style-type: none"> ▪ Any meaningful view of the site is restricted to a small section of the railway bridge crossing. Any adverse visual effect would therefore extremely limited and restricted to a site/local level that is unlikely to be of significance to the decision making process; and ▪ A recent landscape capacity study carried out by the Local Authority identifies land of a similar character and visual setting in close proximity to the site as having a high and medium/high capacity to accommodate change in the form of residential development. <p>3.26 This site presents a development opportunity on unconstrained and abandoned farmland of limited value that is unlikely to result in adverse landscape and visual effects that would be of significance to the planning decision making process.</p>
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- Key
-  Site boundary
 -  Public footpath
 -  Important Open Space
 -  Byway open to all traffic

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 Scale: NTS 0 A3
 Date: 24/08/2013
 Checked: SG

Project: Land East of Longbreach Rd.
 Kibworth
 Drawing No: Site Context
 Client: David Wilson Homes East Midlands

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View 1 - From public footpath 85 approximately 45m from the site looking south-east



View 2 - From public footpath 85 opposite the skate park approximately 35m from the site looking south-west



View 3 - From public footpath 84 approximately 35m from the site looking south-east

Notes

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Parish/Region	Project
GL0488 02	Land East of Longbreach Rd.
Scale	Kidworth
NTS @ A3	Drawings
Date	Photographic Views
24/08/2015	1, 2 & 3
Drawn	Client
SG	David Wilson Homes East Midlands

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 landscape architects

		<p>Attenuation pond to the east of the site Existing settlement Railing at boundary with railway line Public footpath B5 Hedgerow of eastern site boundary</p>  <p>View 4 - From public footpath B5 at the eastern boundary of the site</p> <p>Steps to footbridge over the railway View across the site towards hedgerow at western site boundary and view towards the K&T housing site Attenuation pond to east of site</p>  <p>View 5 - From the cycleway to the south of the attenuation pond approximately 60m from the site looking west</p> <p>View across the site towards hedgerow at western site boundary and view towards the K&T housing site Existing settlement Public footpath B5 Existing settlement Attenuation pond to east of site</p>  <p>View 6 - From public footpath B5 at the railway bridge crossing approximately 5m from the site looking north</p> <p>North</p> <p>tel: 01530 265688 email: info@golbyandluck.co.uk web: www.golbyandluck.co.uk <small>This drawing has been produced by GOLBY AND LUCK, (2016) all rights reserved. Ordnance Survey Licence No. 10003702 registered with (Housi) Office: 207 Leicester Road, Kibworth, Leicestershire LE8 5NP</small></p> <p> <small>Drawings No.</small> GL0488 03 <small>Project</small> Land East of Longbreach Rd. Kibworth <small>Scale</small> NTS @ A3 <small>Drawing No.</small> Photographic Views 4, 5 & 6 <small>Date</small> 24/08/2015 <small>Created</small> SG <small>Client</small> David Wilson Homes, East Midlands golby+luck <small>landscape architects</small> </p>

		<p>Count Archaeologists response to planning application</p> <p>Subject:FW: PLANNIN OFFICER E-MAIL: 15/01929/FUL Land East Of, Longbreach Road, Kibworth Beauchamp, Leicestershire.</p> <p>From: Sophie Clarke Sent: 30 December 2015 12:28 To: Naomi Rose Subject: 15/01929/FUL Land East Of, Longbreach Road, Kibworth Beauchamp, Leicestershire.</p> <p><u>15/01929/FUL : Erection of 18 dwellings and associated access (resubmission of 15/00747/FUL): Land East Of, Longbreach Road, Kibworth Beauchamp, Leicestershire.</u></p> <p>Dear Naomi,</p> <p>Thank you for your consultation on the above planning application. Please find our recommendations for a programme of archaeological investigation outlined below, which is in line with the advice issued for the previous application 15/00747/FUL.</p> <p>Please get back in touch with the team if you have any questions.</p> <p>There is evidence of Iron Age and Anglo-Saxon activity to the immediate west and north of the application site. There is a potential for associated archaeological remains to extend into the application site, however we are satisfied that any remains present are unlikely to be of such significance to warrant preservation <i>in situ</i>. We would recommend that conditions are attached to any forthcoming planning permission to secure a programme of archaeological investigation and recording prior to any development groundworks commencing:</p> <p>1) No development shall commence until a programme of archaeological work, commencing with an initial phase of trial trenching and including any subsequent further investigation necessary, has been detailed within Written Scheme(s) of Investigation, submitted to and approved by the local planning authority in writing. The scheme(s) shall include an assessment of significance and research questions; and:</p>
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		<ul style="list-style-type: none"> • The programme and methodology of site investigation and recording (including the initial trial trenching, assessment of results and preparation of an appropriate mitigation scheme) • The programme for post-investigation assessment • Provision to be made for analysis of the site investigation and recording • Provision to be made for publication and dissemination of the analysis and records of the site investigation • Provision to be made for archive deposition of the analysis and records of the site investigation • Nomination of a competent person or persons/organisation to undertake the works set out within the Written Scheme of Investigation. <p>2) No development shall take place other than in accordance with the Written Scheme(s) of Investigation approved under condition (1).</p> <p>3) The development shall not be occupied until the site investigation and post investigation assessment has been completed in accordance with the programme set out in the Written Scheme(s) of Investigation approved under condition (1) and the provision made for analysis, publication and dissemination of results and archive deposition has been secured.</p> <p><u>Reason:</u> To ensure satisfactory archaeological investigation and recording</p> <p>If planning permission is granted the applicant must obtain suitable Written Scheme(s) of Investigation (WSI) for both phases of archaeological investigation from an organisation acceptable to the planning authority. The WSIs must be submitted to the planning authority and HNET, as archaeological advisors to your authority, for approval before the start of development. They should comply with this Department's "Guidelines and Procedures for Archaeological Work in Leicestershire and Rutland" and with relevant Chartered Institute for Archaeologists "Standards" and "Code of Practice". It should include a suitable indication of arrangements for the implementation of the archaeological work, and the proposed timetable for the development.</p>
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		<p>The Historic and Natural Environment Team, as advisors to the planning authority, will monitor the archaeological work, to ensure that the necessary programme of archaeological work is undertaken to the satisfaction of the planning authority.</p> <p>Should you or the applicant have any further queries please do not hesitate to contact us.</p> <p>Regards,</p>