

## Houghton on the Hill 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
<b>Resident</b>	<p>Page 5 Fig 2-1</p> <p>Page 9 3.3 Objectives 1 and 2</p> <p>Page 6 2.13</p> <p>Page 17 4.23</p> <p>Page 59 1.2.5</p> <p>Pages 1 -60</p>	<p>I could not identify the parish boundary , supposedly shown in purple</p> <p>I should like the Plan to explicitly encourage the villages demographic profile to become somewhat younger during the planning period</p> <p>Much is correctly made of the need for smaller dwellings for older people. But the advantage of their [precious?] houses being taken by younger people and families is not discussed. Whereas the contribution of the active elderly to the community is correctly explained the advantage of an incoming younger population who may eventually (post 2031?) take over this contribution is not suggested.</p> <p>It is unfortunate that the Plan could not be finalised in time to counter the approved housing site to the south of the A47.</p> <p>The beauty salons correct title is 'Annabella' not 'Annabella's'</p> <p>The Plan is a tremendous piece of work congratulations to everyone involved</p>
<b>Resident</b>	Whole document	the plan as drafted seems to be a sensible and appropriate response to the need to make provision for further housing in Houghton but placing it where it will have best access to current larger roads and where it will do least damage to the special countryside of Houghton and High Leicestershire and the wildlife (and people) that reside there – I will vote to support it in the Referendum

<p><b>Resident</b></p>	<p>Para 2.1.3</p> <p>Figure 4.1</p> <p>Policy D2 Page 15</p> <p>Page 16</p>	<p>Having looked at the Neighbourhood Development Plan Examination Version I am surprised that such a dichotomous and omissible document has reached this stage. It is not a concise plan with too much emphasis on idealism, lacking logic ( Some examples commented upon later).</p> <p>The HDC Local Plan envisages 89 – 150 houses over a period to 2030. Approval for 87 has already been granted north of the A47 (likely to be increased to over 100 when further land negotiations are complete) Then the plan has a preferred site north east of Ingarsby Lane for 75 dwellings. So we are now looking at an excess of development before the reckless approval for 48 houses on land off Winckley Close - a site opposed by the village but now given a scant belated and embarrassed coverage in this document. This somewhat renders the NDP obsolete. Not satisfied with that it considers appropriate that additional purpose built dwellings should be available for the over 55s' adding even more development to the village.</p> <p>In total then we could look forward to a housing increase of some 35% in the next 15 years . This is not what Houghton needs or wants. In the NDP doc. 77% of respondents chose 'being rural' as most important. How can we justify this aspiration with a potential huge increase in the size of the village. Being rural means keeping sensible limits on development.</p> <p>Within the document</p> <p>Para 2.1.3 and elsewhere there is undue emphasis on an aging population. This is changing and will continue to change as old people move or pass on (evidenced by the number of young families moving in to the existing housing stock).</p> <p>Also in 2.1.3 and elsewhere there is view that traffic flow within the village and on street parking on the existing roads can be managed. This will not be solved by any measures the NDP can offer – new development will make it worse. It states that poorly planned housing will increase traffic problems. ALL new development will increase traffic problems especially along Main Street.</p> <p>NDP states that respondents walk or cycle within the village. This is mainly for recreation/leisure, not as a means to accessing local facilities. This will remain so especially for new residents who will have further to travel than the current denizens.</p> <p>Figure 4.1 indicates NDP areas for development. It is out of date after the approval of planning application 17/00212/OUT.</p> <p>Policy D2 cannot be realised if you increase the housing stock by 35% as now envisaged.</p> <p>The document keeps banging on about ageing population and states on page 15 that 13 four/five bedroom houses are in single occupancy. That's 2% of the existing housing stock – hardly a significance.</p> <p>On page 16 the document stated that 19% of respondents identified the need for more rental properties the village (or 81% did not). This is symbolic of the dichotomous nature of this document.</p> <p>Houghton is in harmony with itself. Many factors may contribute to this but size is such an important element. The NDP objectives are idealistic and can be best achieved by restricting the size and pace of development in the next 15 years. In expanding the village too fast we will end up as just another out of town suburbia. An issue that this document has not properly addressed.</p>
<p><b>British Horse Society and Leics &amp;</b></p>	<p>Section 2.1.3</p>	<p>The Houghton area is popular for horse riding, with several bridleways and other riding routes to north and south of the village. Riders needing to pass through or around the village have interests in common with other vulnerable users such as walkers and cyclists.</p>

<p><b>Rutland Bridleways Association</b></p>	<p>Policy T2</p> <p>Section 6.1.5</p> <p>All above Sections</p>	<p>Riders recognise the problem of winding and narrow streets. It would therefore be helpful if at least some of the new footpaths and cycleways (Section 3.3, Objective 4) could be accessible to horses, thus helping to free up space for motor traffic. Main through routes used by riders are those linking Stretton Lane with the bridleway (D47) which goes N towards Keyham from the NW corner of the village; also the link from Stretton Lane to Ingarsby Lane.</p> <p>This proposes measures for improving traffic management and safety along the A47. The BHS and LRBA strongly support all such measures, which would also help riders crossing the A47, particularly measures (c) and (d). If light-controlled pedestrian crossings are considered at either of the crossing points identified above (Section 2.1.3) it would be very helpful if operating buttons could be provided which are accessible to mounted riders, as has been done elsewhere. There should at least be horse warning signs each side of the bridleway crossing at the NW end of the village.</p> <p>This identifies the need for an improved and upgraded combined cycleway and footpath between Houghton and Thurnby. The BHS and LRBA would strongly support such a route if it were usable by horse riders. However, for it to be safe for horses it would need to be physically separated from the A47 - eg a 'behind the hedge' route - which would probably be preferred by walkers and cyclists as well. Alternatively the existing footpath (D11) could be considered for upgrading to a multi-user route.</p> <p>Provision of safe and convenient routes for walking and cycling is aimed partly at encouraging a reduction of car usage, in addition to the recreational value. We recognise that horse riding is now almost entirely recreational, but it does have significant economic value. The National Equestrian Survey 2015 estimated annual consumer spending across a wide range of equestrian goods and services in Britain to be £4.3 billion. The East Midlands share of this total is estimated at around £310 million, spent very largely in the rural districts. Riding is therefore an activity that merits at least as much attention as walking and cycling, particularly with regard to the provision of safe routes.</p>
<p><b>Co-op</b></p>	<p>3.2.3</p>	<p>Bullet 1 seeks to justify the housing requirement identified in the Neighbourhood Plan (NP) by reference to the 2015 Consultation Paper on the new Harborough District Council (HDC) Local Plan. This envisaged a need for 170 dwellings in Houghton on the Hill (including a 15% contingency) over the Plan period 2011-2031. For context, this formed part of the total strategic housing requirement of 9,500 dwellings for the period 2011-2031 across Harborough District.</p> <p>However, that consultation paper has now been superseded by the Leicester and Leicestershire Housing and</p>

		<p>Economic Development Needs Assessment (HEDNA) published in January 2017. This identifies an updated strategic housing requirement of 10,640 dwellings in Harborough for the period 2011-2031. This excludes any potentially unmet need from other authorities in the Housing Market Area (HMA). It is noted that Blaby District and Leicester City Councils have already indicated that they may not be able to accommodate the level of growth required, in which case the Duty to Co-operate may necessitate yet more growth in Harborough District. These matters are a fundamental component of the evidence base for both the Local and Neighbourhood Plan. The Examination Version of the Neighbourhood Plan cannot, therefore, be in general conformity with the strategic policies contained within the Development Plan or contribute to the achievement of sustainable development. It is based on a outdated housing requirement and ignores an evolving evidence base.</p> <p>At the very least, the NP should identify reserve housing sites to ensure flexibility to meet a higher housing requirement or address problems of deliverability. Similarly, any reference to housing requirements within Houghton on the Hill should be expressed as a minima to ensure choice and flexibility in the delivery of housing, as required by the NPPF.</p> <p>Policy H1 (f) Bullet (f) of draft Policy H1 seeks to introduce a phasing mechanism to the delivery of housing where planning consent has not already been granted. This policy should cross- reference to the appropriate document/s within the evidence base which supports this approach. It is not sufficient for the draft NP to simply seek to restrict housing delivery for non-planning reasons.</p> <p>Policy H1(g) Bullet (g) is prescriptive in terms of the housing mix which should be delivered on all developments in Houghton on the Hill. Again, there should be cross-reference to any documents within the NP evidence base, with particular reference to the need for 25% bungalows on all housing developments, to support this onerous policy provision. Whilst the accommodation needs of older people are recognised in the HEDNA, a prescriptive approach to housing mixed is not endorsed or supported. Housing mix is a market-led matter and commercial considerations are key. Bungalows in particular also compromise average development densities and are not an efficient use of housing land. A more general policy approach which supports the delivery of a range of house types to meet the needs of all households would be more commensurate with national policy and guidance and contribute to the aims of achieving sustainable development.</p> <p>Policy H1(h) Bullet (h) proposes to regard bungalows as two affordable dwellings. We are not aware of any precedent for this interpretation, either locally or nationally. The accommodation needs of older people should be addressed at the District level through District-wide policies aimed at ensuring all market housing developments meet the needs of all households and are policy-compliant in terms of the proportion of affordable housing. These are distinct matters. Such an interpretation at the neighbourhood level would only ensure the housing needs of ageing residents are met, disregards the needs of first-time buyers, younger households and those looking to move into the community. This would not lead to sustainable communities.</p> <p>Policy H2 The draft NP seeks to downplay the need for affordable housing to be delivered within Houghton on the Hill. The</p>
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	Policy H3	<p>affordable housing needs of the District are identified in the HEDNA and will be further refined in the emerging Local Plan, supported by appropriate viability assessments. It is not acceptable for the Neighbourhood Plan to seek exemptions to meeting the needs of all households, both market and affordable, via the Neighbourhood Plan. Again, this is an example of how the NP cannot be in general conformity with the strategic policies in the local Development Plan and another reason which the basic conditions are not met.</p> <p>This policy advises that the final HDC Local Plan will provide the overall requirements for new dwellings in Houghton over the Plan period. However, the NP does not advise what sites will be allocated should the resultant housing need be higher than the 170 dwellings envisaged in the NP. Similarly, the site at Winckley Close now benefits from outline planning permission (HDC Ref: 17/00212/OUT) for 44 dwellings, following approval by Harborough District Council. The ongoing is appeal is, therefore, immaterial. Consequently, the NP should be updated to reflect this position.</p> <p>As stated previously, the land owned by the Co-op north of Stretton Lane should be allocated for housing purposes in the Neighbourhood Plan. As Figure 4-3 of the NP confirms, the Co-op land is assessed as having the same Landscape Capacity (medium) as the three sites allocated for housing the NP. Therefore, landscape impact alone is not a tenable reason to resist future residential development on the land north of Stretton Lane. Additionally, the allocation of this site could facilitate the relocation of some Community Allotment space, as referred to under Policy S3 (Provision of Allotments) of the Draft NP.</p>
<b>CPRE</b>	<p>Policy D3</p> <p>Policy E1</p> <p>4.6 Environment</p> <p>VDS 1.8.1</p>	<p>CPRE Leics understands that the intention is to protect existing green spaces from development. However the policy is a bit vague and only talks about protection - which might mean fencing, etc? Might this be worded more explicitly?</p> <p>We think it would be useful to list the green spaces, either in the policy or the text. Some of these are already designated as Local Green Spaces - perhaps the intention is to add to others via the District Council's process (p32)?</p> <p>The plan is quite focussed on the settlement. We would have liked to have seen more on biodiversity, trees, woodlands and hedges, any historic environment, footpaths and bridleways etc. in the wider parish.</p> <p>Cpre Leics welcome a statement on landscape impact.</p>
<b>Environment Agency</b>	Policy S6, page 25.	We note that a portion of the land of the proposed golf course lies within Flood Zones 2 and 3. The Flood Zone is associated with an 'ordinary watercourse', and development

	<p>within consentable distances from such watercourses lies with the Lead Local Flood Authority (Leicestershire County Council). Table 2: "Flood risk vulnerability classification" of the Technical Guidance to the National Planning Policy Framework (NPPF) states that outdoor sports and recreation and essential facilities such as changing rooms are deemed appropriate development in Flood Zone 2 and 3. However, this does not negate the need for the Local Planning Authority to deem the site sequentially preferable from a flood risk perspective, nor does it negate the need for an NPPF compliant Flood Risk Assessment to be submitted as part of any planning application proposing development within flood zone. We further note that there is not a Policy which specifically addresses the issue of Flood Risk in the Plan. However, where the Plan silent, development proposals will have to be in line with the District Council's policy's, and Harborough District Council's current Plan does have such a Policy on Flood Risk.</p>
<p><b>Gladman Developments Ltd</b></p>	<p>This letter provides Gladman Developments Ltd (Gladman) representations in response to the submission version of the Houghton on the Hill Neighbourhood Plan (HNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. Gladman requests to be added to the Council's consultation database and to be kept informed on the progress of the emerging neighbourhood plan. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy.</p> <p>Legal Requirements</p> <p>Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the HNP must meet are as follows:</p> <ul style="list-style-type: none"> <li>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</li> <li>(d) The making of the order contributes to the achievement of sustainable development.</li> <li>(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).</li> <li>(f) The making of the order does not breach, and is otherwise compatible with, EU obligations.</li> </ul> <p>National Planning Policy Framework and Planning Practice Guidance</p> <p>The National Planning Policy Framework (the Framework) sets out the Government 's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.</p>

	Review Policy	<p>At the heart of the Framework is a presumption in favour of sustainable development , which should be seen as a golden thread through both plan-making and decision-taking. For plan -making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs , with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.</p> <p>The recent Planning Practice Guidance (PPG) updates make clear that neighbourhood plans should conform to national policy requirements and take account the latest and most up-to-date evidence of housing needs in order to assist the Council in delivering sustainable development, a neighbourhood plan basic condition.</p> <p>The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.</p> <p>Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.</p> <p>Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.</p> <p>Planning Practice Guidance</p> <p>It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).</p> <p>On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these updates a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.</p> <p>On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that</p>
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	<p>Policy D2</p>	<p>where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.</p> <p>Further, the PPG makes clear that neighbourhood plans should not contain policies restricting housing development in settlements or preventing other settlements from being expanded. It is with that in mind that Gladman has reservations regarding the HNP's ability to meet basic condition (a) and this will be discussed in greater detail throughout this response.</p> <p>Relationship to Local Plan</p> <p>Adopted Local Plan</p> <p>The adopted Development Plan relevant to the preparation of the Houghton Neighbourhood Plan consists of the adopted Harborough Core Strategy covering the period from 2006 - 2028. This plan was adopted in November 2011 and therefore is out of date against the requirements of the Framework which requires local planning authorities to identify and meet full Objectively Assessed Needs (OAN) for housing. Whilst this is the Development Plan that the Houghton Neighbourhood Plan will be tested against it is important that sufficient flexibility is included within the Plan so that its contents are not superseded by the provisions of s38(5) of the Planning and Compulsory Purchase Act 2004.</p> <p>Emerging Local Plan</p> <p>To meet the requirements of the Framework, the Council has commenced work on a new Local Plan. The July 2017 LDS confirms that pre-submission consultation on the Local Plan is anticipated to commence at some point in September, with adoption expected in October 2018. As such, given that the Plan is in the early stages of preparation, there remains considerable uncertainty over what level of development that Houghton may need to accommodate to assist the Council in meeting its OAN for housing. Accordingly, the Plan will need to ensure that it allows for sufficient flexibility to ensure that it is able to react to changes that may arise through the emerging Local Plan Examination.</p> <p>Houghton Neighbourhood Plan</p> <p>This section highlights the key issues that Gladman would like to raise with regards to the content of the HNP as currently proposed. It is considered that some policies do not reflect the requirements of national policy and guidance, Gladman have therefore sought to recommend a series of alternative options that should be explored prior to the Plan being submitted for Independent Examination.</p> <p>Policy D2: Preserving The Essential Character of Houghton Outside The Conservation Area</p> <p>Policy D2 state s that all new developments must adhere to the design principle set out in the VDS and ensure that the</p>
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		<p>Gladman opposes the use of limits to development if these would preclude otherwise sustainable development from coming forward. The Framework is clear that development which is sustainable should go ahead without delay. The use of development limits to arbitrarily restrict suitable development from coming forward on the edge of settlements does not accord with the positive approach to growth required by the Framework and is contrary to basic condition (a).</p> <p>Further to this, Gladman cannot identify sufficient evidence to demonstrate why it is appropriate to limit development to that which falls in the limits of development and there is no evidence to indicate that sufficient development within the limits will come forward within the plan period. Gladman therefore suggest that sufficient flexibility is built into the policy so that it is not ultimately superseded following any subsequent adoption of the emerging Local Plan.</p> <p>Criterion F of Policy H1 details a very prescriptive mix of house types with developments being expected to include 25% bungalows and 75% houses. Gladman consider that this policy is inflexible and overly restrictive and could, in its current form act to restrict sustainable development opportunities from coming forward. We therefore suggest that this element of the policy is deleted.</p> <p>Conclusions</p> <p>Gladman recognises the role of neighbourhood plans as a tool for local people to shape the development of their local community. However. it is clear from national guidance that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the HNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.</p> <p>Gladman is concerned that the plan in its current form does not comply with basic conditions (a) and (d). The plan does not conform with national policy and guidance and in its current form does not contribute to the achievement of sustainable development. Gladman formally request to participate at the hearing session(s) should the Examiner decide it necessary to discuss these issues in a public forum.</p> <p>Gladman hopes you have found these representations helpful and constructive. If you have any questions do not hesitate to contact me or one of the Gladman team.</p>
<b>Highways England</b>		<p>Highways England welcomes the opportunity to comment on the submission version of the Neighbourhood Plan and Village Design Statement for Houghton on the Hill which covers the period 2017-2031. We note that the document provides a vision for the future of the village and sets out a number of key objectives and planning policies which will be used to help determine planning applications.</p>

		<p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is our role to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to the Houghton on the Hill Neighbourhood Plan, our principal interest is safeguarding the operation of the M1 which routes some 11 miles to the west of the Plan area and the A46 which routes approximately 8 miles to the north.</p> <p>We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Houghton on the Hill is required to be in conformity with the Harborough District Council Local Plan (HDCLP), and this is acknowledged within the document.</p> <p>We note that a total of 170 dwellings will be delivered over the Plan period across three different sites. Given the distance of the Plan area from the SRN and the limited amount of growth set to come forward, we do not consider there will be any impact on the operation of the M1 or A46. With regard to the Village Design Statement, we have conducted a high level review and note that its purpose is to illustrate the distinctive elements and characteristics of the village that should be considered by developers when designing new buildings or altering existing buildings. With this said we do not consider that it is within our remit to provide comments in relation to this statement.</p> <p>We trust that the above is useful in the progression of the Houghton on the Hill Neighbourhood Plan.</p>
<p><b>Houghton on the Hill Parish Council</b></p>	<p>Housing numbers and resulting policies</p>	<p>The production period of the NDP coincided with a number of approaches by developers for housing development in the NDP area in the absence of a current Local Plan. Planning applications were submitted during the production period and continued after its submission, and during subsequent consultations. Drafts of the HDC Local Plan are continuing to appear. The decision was made by the Parish Council to submit the NDP against this changing background since there was no clear endpoint in sight to the continuing changes and uncertainty.</p> <p>Since the submission of the NDP there have been two highly significant events which affect the NDP. These are:</p> <ol style="list-style-type: none"> <li>1. Publication of the Proposed Submission version of the HDC Local Plan to 2031 which gives an updated requirement for the minimum number of new houses required in our designated area during the plan period of 65. This 65, which is inclusive of a 20% contingency, was determined in advance of point 2 below.</li> <li>2. Approval by HDC on 26th July 2017 of outline planning permission for the construction of 48 houses at a site adjoining the south west of the village south of the A47 (off Winckley Close). This location was not one preferred in community consultations and so was not included in the NDP.</li> </ol> <p>The NDP Working Party and Parish Council were aware of the uncertainty caused by the potential of these two events and thus built conditional contingency options into the submitted plan. Since these factors are now resolved, the contingency options can now be simplified and we propose specific changes to simplify and clarify the text of the document. These changes are listed below.</p>

Housing minimum number used throughout the document.

Using the " Proposed Submission version of the HDC Local Plan to 2031 " the requirement for new dwellings for Houghton is a minimum of an additional 65 (Local Plan 2011-2031, PSS). This is in addition to sites which already have planning permission granted, but have not yet been developed:

<i>Hazelton site north of Uppingham Road (Site 2)</i>	Ref: 13/01641/OUT and 14/01439/FUL	17
<i>Davidsons site north of Uppingham Road (Site 1)</i>	Ref: 17/00257/REM	70
<i>Balance required from HDC Plan Policy H1</i>		65
	<b>Total</b>	<b>152</b>
<i>Of the balance required of</i>		65
<i>William Davis site off Winckley Close (Site Z)</i>	Ref. 17/00212/OUT	48
<b><i>Balance still to be provided</i></b>		<b>17</b>

In the Submitted NDP document the number used was "...at least 170 new dwellings" . We request that this be edited throughout the document to "...at least 152 new dwellings". Also : with the publication of the proposed submission version of the Local Plan, all hyperlinks to the plan need to be updated.

Page 4

In listing of policies in bullet-point list :

Change "...total of 25 policies ..." to "...total of 26 policies ..."

Change "...seven on housing location and types (H1 to H7)" to "...eight on housing location and types (H1 to H8)"

	<p>Page 4 Paragraph 3</p> <p>Page 8 Section 3.2.3</p> <p>Page 11 Figure 4.1</p>	<p>Replace:  <i>"The housing policies plan for 170 dwellings (which includes a 15% contingency) to be distributed over three sites to the north of the A47 unless the appeal by William Davis to build 44 dwellings off Winckley Close is upheld; in which case the numbers to the north of the A47 will be lower. It is envisaged that a decision on this appeal will be received in the summer/autumn of 2017. One policy proposes..."</i></p> <p>With:  <i>"The housing policies plan for 152 dwellings over a range of sites. One policy proposes ..."</i></p> <p>Replace:  <i>"The 2015 Consultation Paper on the new HDC Local Plan envisages the need for 170 dwellings, which includes a 15% contingency for increases over the plan period 2015 and 2030. "</i></p> <p>With:  <i>"The Proposed Submission version of the HDC Local Plan to 2031 states the requirement for new dwellings for Houghton is a minimum of 65 additional dwellings, which is inclusive of a 20% contingency, over the plan period. This is in addition to sites which already have planning permission granted, but have not yet been developed:</i></p> <table border="1" data-bbox="698 783 2092 1145"> <tr> <td><i>Hazelton site north of Uppingham Road (Site 2)</i></td> <td>Ref: 13/01641/OUT and 14/01439/FUL</td> <td>17</td> </tr> <tr> <td><i>Davidsons site north of Uppingham Road (Site 1)</i></td> <td>Ref: 17/00257/REM</td> <td>70</td> </tr> <tr> <td><i>Balance required from HOC Plan Policy H1</i></td> <td></td> <td>65</td> </tr> <tr> <td></td> <td>Total</td> <td><b>152</b></td> </tr> <tr> <td><i>Of the balance required of</i></td> <td></td> <td>65</td> </tr> <tr> <td><i>William Davis site off Winckley Close (Site Z)</i></td> <td>Ref: 17/00212/OUT</td> <td><b>48</b></td> </tr> <tr> <td><i>Balance still to be provided</i></td> <td></td> <td>17</td> </tr> </table> <p>Amended Figure supplied which now includes as "residential development site" Site Z (off Winckley Close).</p>	<i>Hazelton site north of Uppingham Road (Site 2)</i>	Ref: 13/01641/OUT and 14/01439/FUL	17	<i>Davidsons site north of Uppingham Road (Site 1)</i>	Ref: 17/00257/REM	70	<i>Balance required from HOC Plan Policy H1</i>		65		Total	<b>152</b>	<i>Of the balance required of</i>		65	<i>William Davis site off Winckley Close (Site Z)</i>	Ref: 17/00212/OUT	<b>48</b>	<i>Balance still to be provided</i>		17
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		<p><i>Submission July 2017 totals a further 17 dwellings. This will be sought to be accommodated within individual plot developments and/or other small site development opportunities within the current built environment which emerge over the life of the plan - see Policy H7. Any larger scale requirements i.e. above the shortfall of 17, which occur over the life of the plan, influenced by further Government demands on HOC, would be permitted on locations north of the A47. This would include Site 3, which in the village-wide consultations was preferred to development south of the A47. e) The developers of all locations/sites will be required to follow both detail of the relevant site-specific policy (H4 to H7) and the guidelines for site layout and building design set out in the Village Design Statement.</i></p>
	Page 18 Figure 4.2	A substitute diagram and caption are attached, which include the development which has now been granted planning permission by HDC, Site Z.
	Page 19 Policy H4	<p>For consistency in wording with H5 and H6, but with no intention of changing the substance of the policy:-          Replace:  <i>" Not withstanding that outline planning permission has been granted for this site the development should be subject to Policies H1 , H2 &amp; H3 and comply with the following criterion:"</i>          With:  <i>" Not withstanding that outline planning permission for 70 dwellings has been granted for this site the development should comply with policies H1, H2 &amp; H3 and the following criterion:"</i></p>
	Page 20 Insert New policy H6 as shown here before existing policy H6	<i>"Outline planning permission for the construction of 48 houses at a site adjoining the west of the village, off Winckley Close, was granted by HDC on 26th July 2017. This location was not one preferred in community consultations and so that site was not included in the submitted version of the NDP. The site has now been included in the revised NDP and labelled Site Z."</i>
	Page 20 Insert new Policy H7 to replace the old Policy labelled H6 and to follow the explanatory text following the new Policy	<p>Replace existing "Policy H7" with new "Policy H7" below. Existing H7 becomes H8 but with no changes:</p> <p><b>POLICY H7: DEVELOPMENT OF OTHER LOCATIONS (EXCLUDING SITE 1 Policy H4, SITE 2 Policy H5 &amp; Site Z Policy H6)</b></p> <p>a) <i>The shortfall against the HDC New Local Plan of 17 dwellings should firstly be accommodated on individual plots within not beyond the built environment, which may become available over the period of the Plan.</i>          b) <i>Any additional demand emerging from revisions to the HDC New Local Plan over the life of Houghton's Neighbourhood Plan will be permitted at locations north of the A47.</i></p>

	<p>H6</p> <p>Page 20 New paragraphs after New Policy H7 Replacing previous text following old Policy H6</p> <p>Page 21</p> <p>Page 21</p> <p>Page 26</p>	<p>c) <i>Developments to be controlled by</i></p> <ul style="list-style-type: none"> <li>i) <i>not permitting development delivery beyond the Local Plan demand</i></li> <li>ii) <i>not building further west than the existing build line of Deane Gate Drive nor further east than the eastern boundary of Site 3 on Figure 4-1, and</i></li> <li>iii) <i>development other than infill should commence no earlier than 2028</i></li> </ul> <p>d) <i>For all of the above, consideration should be given to the provision of dwellings for people later in life or having mobility issues. See Policy H8.</i></p> <p><i>"There are no current planning applications for sites north of the A47. Site 3 is in the HOC Strategic Housing Land Availability Assessment (SHLAA) 2015 Update - p16, May 2016, and agents for the developers have been in contact with HDC and Houghton Parish Council.</i></p> <p><i>These developments specified in policies H4 to H7 will affect the traffic flow and associated safety issues along the A47 and the linked roads. These issues are considered in detail in the Traffic and Transport section 4.4 and particularly in Policy T2."</i></p> <p>Replace first line: <i>"The combination of sites 1, 2 and 3 provides a total of some 162 dwellings, close to the 170 expected requirement for Houghton in the evolving HOC Local Plan."</i></p> <p>With: <i>11 The combination of Policies H3 to H1 provides for the number of dwellings, identified for Houghton in the Proposed Submission version of the HDC Local Plan to 2031 "</i></p> <p>Text 4 lines from the bottom, delete phrase as below: <del><i>...have already left the village for more appropriate accommodation as already mentioned in the narrative supporting Policy H4. This is detrimental to the future...</i></del></p> <p>Change Number of existing Policy " H7" to " H8" .</p> <p>Replace Fig 4-5 with the new version which shows Site Z.</p>
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<p><b>HSE</b></p>	<p>Thank you for your request to provide a representation on the above consultation document. When consulted on land use planning matters, HSE where possible will make representations to ensure that compatible development within the consultation zones of major hazard establishments and major accident hazard pipelines (MAHPs) is achieved. HSE acknowledges that early consultation can be an effective way of alleviating problems due to incompatible development at the later stages of the planning process.</p> <p>HSE gives advice on neighbourhood plans with reference to the condition that neighbourhood plans or Orders must be in general conformity with the strategic policies of the Local Plan, and that neighbourhood plans or Orders must be compatible with European Union obligations, as incorporated into UK law (Planning Practice Guidance – Neighbourhood Planning – Para 065). Our advice therefore is given with consideration to the following.</p> <ol style="list-style-type: none"> <li>1. The National Planning Policy Framework ( Para. 172) requires that planning policies should be based on up-to-date information on the location of major accident hazards and on the mitigation of the consequences of major accidents</li> <li>2. Regulation 10(1)(b) of the Town and Country Planning (Local Planning) (England) Regulations 2012 as amended<sup>1</sup> requires that in local plans and supplementary planning documents, regard be had for the objectives of preventing major accidents and limiting the consequences of such accidents for human health and the environment by pursuing those objectives through the controls described in Article 13 of Council Directive 2012/18/EU (Seveso III)<sup>2</sup>. Regulation 10(c)(i) requires that regard also be had to the need, in the long term, to maintain appropriate safety distances between establishments and residential areas, buildings and areas of public use, recreational areas, and, as far as possible, major transport routes</li> </ol> <p><small>1 Amended by r.33 - Schedule 5 of The Planning (Hazardous Substances) Regulations 2015</small></p> <p><b>Scope of Advice</b></p> <p>At this early stage HSE can give a general opinion regarding development compatibility based only on the outline information contained in your plan. This opinion takes no account of any intention to vary, relinquish or revoke hazardous substances consents<sup>3</sup>. Planning authorities are advised to use HSE's Planning Advice Web App to verify any advice given. The Web App is a software version of the methodology used in providing land use planning advice. It replaces PADHI+. Further information on the Web App is available on HSE's website: <a href="http://www.hse.gov.uk/landuseplanning/padhi.htm">http://www.hse.gov.uk/landuseplanning/padhi.htm</a></p> <p><b>Encroachment of Local Plan Allocations on Consultations Zones</b></p> <p>We have concluded that there is the potential for land allocated in your plan to encroach on consultations zones, namely.</p> <p>NGG MAHP 6931 – Stretton Lane/Potter Hill</p>
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		<p><b>Compatibility of Development with Consultation Zones</b></p> <p>The compatibility issues raised by developing housing and workplaces within the inner, middle and outer zones are summarised below.</p> <p><b>Housing Allocations</b></p> <p>Inner Zone – Housing is not compatible with development in the inner zone. HSE would normally Advise Against such development. The only exception is developments of 1 or 2 dwelling units where there is a minimal increase in people at risk.</p> <p>Middle Zone – The middle zone is compatible with housing developments up to and including 30 dwelling units and at a density of no more than 40 per hectare.</p> <p>2 Article 13(1) provides that Member States shall ensure that the objectives of preventing major accidents and limiting the consequences of such accidents for human health and the environment are taken into account in land use policies or other relevant policies. They shall pursue those objectives through controls on: (a) the siting of new establishments; (b) modifications to establishments covered by Article 11; and (c) new developments including transport routes, locations of public use and residential areas in the vicinity of establishments, where the siting or developments may be the source of or increase the risk or consequences of a major accident</p> <p>3 Hazardous substances consents are granted by the Hazardous Substances Authority (HSA), which is usually the planning authority. The consent process is regulated by the HSA under The Planning (Hazardous Substances) Regulations 2015. The HSA must consult HSE on consent applications. In assessing the application for consent, HSE will produce a map with risk contours (or zones), representing the risk to a hypothetical house resident. Should the HSA grant consent, this map defines the consultation distance within which HSE must be consulted over any relevant future planning applications</p> <p>Outer Zone – Housing is compatible with development in the outer zone including larger developments of more than 30 dwelling units and high-density developments of more than 40 dwelling units per hectare.</p> <p><b>Workplace Allocations</b></p> <p>Inner Zone – Workplaces (predominantly non-retail) providing for less than 100 occupants in each building and less than 3 occupied storeys are compatible with the inner zone. Retail developments with less than 250m<sup>2</sup> total floor space are compatible with the inner zone.</p> <p>Note: Workplaces (predominantly non-retail) providing for 100 or more occupants in any building or 3 or more occupied storeys in height are compatible with the inner zone where the development is at the major hazard site itself and will be under the control of the site operator.</p> <p>Middle Zone – The middle zone is compatible with workplaces (predominantly non-retail). Retail developments with total floor space up to 5000m<sup>2</sup> are compatible with the middle zone.</p>
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	<p>Outer Zone – Workplaces (predominantly non-retail) are compatible with the outer zone. Workplaces (predominantly non-retail) specifically for people with disabilities (e.g. sheltered workshops) are only compatible with the outer zone. Retail developments with more than 5000m<sup>2</sup> total floor space are compatible with the outer zone.</p> <p>This is a general description of the compatibility for housing and workplaces. Detail of other development types, for example institutional accommodation and education, and their compatibility with consultations zones can be found in the section on Development Type Tables of HSE’s Land Use Planning Methodology, which is available at: <a href="http://www.hse.gov.uk/landuseplanning/methodology.pdf">http://www.hse.gov.uk/landuseplanning/methodology.pdf</a></p> <p><b>Mixed-Use Allocations</b></p> <p>Because of the potential complexity when combination use classes are proposed, advice regarding mixed-use allocations is outside the scope of the general advice that can be given in this representation. Please refer to the Web App to determine HSE’s advice regarding mixed-use developments.</p> <p><b>Verification of Advice using the Web App</b></p> <p>The potential for encroachment is being brought to your attention at an early stage so that you can assess the actual extent of any incompatibility on future developments. Information on the location and extent of the consultation zones associated with major hazard establishments and MAHPs can be found on HSE’s extranet system along with advice on HSE’s land use planning policy. Lists of all major hazard establishments and MAHPs, consultation zone maps for establishments, and consultation distances for MAHPs are included to aid planners. All planning authorities should have an authorised administrator who can access HSE’s Planning Advice Web App; further information is available on HSE’s website: <a href="http://www.hse.gov.uk/landuseplanning/padhi.htm">http://www.hse.gov.uk/landuseplanning/padhi.htm</a> . When sufficient information on the location and use class of sites becomes available at the pre-planning stages of your local plan, the use of the Web App could assist you in making informed planning decisions about development compatibility.</p> <p><b>Identifying Consultation Zones in Local Plans</b></p> <p>HSE recommends that where there are major hazard establishments and MAHPs within the area of your local plan, that you mark the associated consultation zones on a map. This is an effective way to identify the development proposals that could encroach on consultation zones, and the extent of any encroachment that could occur. The proposal maps in site allocation development planning documents may be suitable for presenting this information. We particularly recommend marking the zones associated with any MAHPs, and HSE advises that you contact the pipeline operator for up-to-date information on pipeline location, as pipelines can be diverted by operators from notified routes. Most incidents involving damage to buried pipelines occur because third parties are not aware of their presence.</p> <p><b>Identifying Compatible Development in Local Plans</b></p> <p>The guidance in HSE’s Land Use Planning Methodology, available at</p>
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		<p><a href="http://www.hse.gov.uk/landuseplanning/methodology.pdf">http://www.hse.gov.uk/landuseplanning/methodology.pdf</a> will allow you to identify compatible development within any consultation zone in the area of your local plan. HSE recommends that you include in your plan an analysis of compatible development type within the consultation zones of major hazard establishments and MAHPs based on the methodology. The sections on Development Type Tables and the Decision Matrix are particularly relevant, and contain sufficient information to provide a general assessment of compatible development by use class within the zones.</p> <p>There are a number of factors that can alter a Web App decision, for example where a development straddles 2 zones. These factors are outside the scope of the general advice in this letter. HSE's final advice on development compatibility can only be determined through use of the Web App.</p> <p>If you have any questions about the content of this letter, please contact me at the address given in the letter head.</p>
<b>Resident</b>	<p>3.2 page 7 Houghton Key community Issues. and 3.2.1 Value and protect Houghton as a hill-top village in High Leicestershire</p> <p>3.2.4 page 8 Traffic Management and Transport</p>	<p>Community Questionnaire results were inherently skewed because only 70 (Ingarsby Lane, Ingarsby Close and Uppingham Road-even nos.) of the 641 residences are situated North of the A47. Naturally responses stated a preference for development as far away from their homes as possible. The number of responses is individuals not households. Analysis shows 118 in favour of site A, and 149 for site B as 1st preference- the only two sites shown as north of the A47. It may have been further influenced by showing them a "Developable in 16+years"; whereas sites C, D &amp; E (south of A47 and West of Village) were shown as 6-10 years. There is also a point of view that the plan has been drawn up under undue influence from one particular large landowner, and their wishes have been given preference in the allocation of proposed development sites. Interestingly the number of responses putting the sites as least preferred - option 9 - were 78 for site A, 22 for site B; site C -75, site D (adjacent to Winckley Close) -79 and site E - 78. Therefore the claim that the majority of residents "prefer development to be north of the A47" which is repeatedly mentioned in the Plan- must be treated with some scepticism. another important point is that the Allotments (adjacent to Site B) were later brought in to the NP as a possible development site- yet were NEVER mentioned in the Questionnaire!</p> <p>There is a great concern about traffic in and around the village, yet the plan wants new development to be situated north of the A47! This is a major trunk road with a traffic volumes around 10,000 vehicles per day- (Department of Transport on 2015 (Census ref. 36523 East Midlands over 8 km stretch from Thurnby to B6047 junction) the daily flow was 9256 vehicles, of which 988 were HGVs. The average speed through Houghton – in a 40 mph limit- was 46mph according to a Leicestershire County council survey!) It is therefore very difficult to cross at peak times and the new residents would most likely use cars to access the rest of the village facilities, site A is some 0.8 Kilometres from the school. Leicestershire County Council, the Highways Authority has a policy of restricting new access points on Trunk Roads and has not yet stated its position on any further access to the A47 in Houghton on the Hill, apart from site B and the small site adjacent to the</p>

		allotments.
	Policy H1, page 14 General Housing Provision	Mentions "safe and suitable access and connectivity between adjacent sites and the rest of the village" . How can this possible be achieved if all development is to be situated north of the A47 with a daily traffic flow between 9,000 and 10,000 vehicles per day? Most villages in the UK want to be bypassed, yet this plan is fundamentally flawed in wanting to expand the village so that it effectively straddles a major trunk road!
	Policy H6, page 20 Development of site 3	This site is north of the A47 behind Ingarsby Lane and occupies a very prominent position on the sky-line, being the highest point in Houghton, approx 520 metres above sea level, and visible from over 3 kilometers in a north-easterly direction, Billesdon Coplow and Quenby Hall.
	Policy H6, page 20 Development of site 3	This site is north of the A47 behind Ingarsby Lane, and it is proposed to close off Ingarsby Lane and create a new junction onto the A47. This would be a gross inconvenience to the residents of Ingarsby Close & Ingarsby Lane- meaning a detour of 0.3-0.4 Km for each journey. Ingarsby Lane is the only access road to the farmland and properties in the area (including Ingarsby Hall for large vehicles- due to the narrow disused railway bridge east of Ingarsby Hall. It is ridiculous to suggest that such vehicles ( such as HGVs and combine harvesters) could travel through a housing estate on a road with speed tables etc! There is also the question of DEMOCRACY- why should the residents of the village south of the A47 be able to impose their wishes onto the 50 Ingarsby households- who have not been properly consulted about the road closure/re-routing. it is also very difficult to understand why the rural views and environment are less important to the north of the A47 than those behind Winckley Close, North Way and Stretton Lane. A public enquiry would be demanded on the proposed road closure. In addition the residents of Ingarsby Lane would probably have a valid claim for "Planning Blight".
	H7 page 21 Provision of dwellings for people in later life or having mobility issues	How will this be accomplished by building such properties on the opposite side of the A47 - a major trunk road, over 800 metres from all the facilities in the village- shop, post office, pharmacy, village hall, places of worship etc??
	Policy S2 Infrastructure	States that "a) Measures that address local traffic congestion and parking problems, particularly associated with the Primary School and other community buildings. b) Measures to promote pedestrian and cycle transport within the village and the broader

	<p>Policy S3 provision of allotments page 23</p> <p>Policy S6 Construction of Golf Course page 25</p> <p>4.4.1, Policy T1 Traffic Management. page 26. policy T2 page 27</p>	<p>plan area (see also Policy E3 and Community Projects). " Again this is thwarted for the proposed new developments by them being placed on the north side of the A47!</p> <p>The possible sale and relocation of this important community asset was NEVER included in the Community Questionnaire</p> <p>This has been included to facilitate development of land for housing at Scraftoft. It seems to be at the behest and influence of the same large landowner who owns Site A. The site is far less conspicuous from a distance than Site A. It would be much more suitable for housing, as it is adjacent to the main village and in walking distance of the centre. It would be accessible on foot through the playing field area.</p> <p>Not in any helped by building north of A47- see previous comments.</p>
<p><b>Resident</b></p>	<p>3.2 page 7 Houghton Key community Issues.and 3.2.1 Value and protect Houghton as a hill-top village in High Leicestershire</p>	<p>Community Questionnaire results were inherently skewed because only 70 (Ingarsby Lane, Ingarsby Close and Uppingham Road-even nos.) of the 641 residences are situated North of the A47. Naturally responses stated a preference for development as far away from their homes as possible. The number of responses is individuals not households. Analysis shows 118 in favour of site A, and 149 for site B as 1st preference- the only two sites shown as north of the A47. It may have been further influenced by showing them a "Developable in 16+years"; whereas sites C, D &amp; E (south of A47 and West of Village) were shown as 6-10 years. There is also a point of view that the plan has been drawn up under undue influence from one particular large landowner, and their wishes have been given preference in the allocation of proposed development sites. Interestingly the number of responses putting the sites as least preferred - option 9 - were 78 for site A, 22 for site B; site C -75, site D (adjacent to Winckley Close) -79 and site E - 78. Therefore the claim that the majority of residents "prefer development to be north of the A47" which is repeatedly mentioned in the Plan- must be treated with some scepticism.</p>

	<p>3.2.4 page 8 Traffic Management and Transport</p>	<p>another important point is that the Allotments (adjacent to Site B) were later brought in to the NP as a possible development site- yet were NEVER mentioned in the Questionnaire!</p> <p>There is a great concern about traffic in and around the village, yet the plan wants new development to be situated north of the A47! This is a major trunk road with a traffic volumes around 10,000 vehicles per day- (Department of Transport on 2015 (Census ref. 36523 East Midlands over 8 km stretch from Thurnby to B6047 junction) the daily flow was 9256 vehicles, of which 988 were HGVs. The average speed through Houghton – in a 40 mph limit- was 46mph according to a Leicestershire County council survey!) It is therefore very difficult to cross at peak times and the new residents would most likely use cars to access the rest of the village facilities, site A is some 0.8 Kilometres from the school. Leicestershire County Council, the Highways Authority has a policy of restricting new access points on Trunk Roads and has not yet stated its position on any further access to the A47 in Houghton on the Hill, apart from site B and the small site adjacent to the allotments.</p>
	<p>Policy H1, page 14 General Housing Provision</p>	<p>Mentions "safe and suitable access and connectivity between adjacent sites and the rest of the village" . How can this possible be achieved if all development is to be situated north of the A47 with a daily traffic flow between 9,000 and 10,000 vehicles per day? Most villages in the UK want to be bypassed, yet this plan is fundamentally flawed in wanting to expand the village so that it effectively straddles a major trunk road!</p>
	<p>Policy H6, page 20 Development of site 3</p>	<p>This site is north of the A47 behind Ingarsby Lane and occupies a very prominent position on the sky-line, being the highest point in Houghton, approx 520 metres above sea level, and visible from over 3 kilometers in a north-easterly direction, Billesdon Coplow and Quenby Hall.</p> <p>This site is north of the A47 behind Ingarsby Lane, and it is proposed to close off Ingarsby Lane and create a new junction onto the A47. This would be a gross inconvenience to the residents of Ingarsby Close &amp; Ingarsby Lane- meaning a detour of 0.3-0.4 Km for each journey. Ingarsby Lane is the only access road to the farmland and properties in the area (including Ingarsby Hall) for large vehicles- due to the narrow disused railway bridge east of Ingarsby Hall. It is ridiculous to suggest that such vehicles ( such as HGVs and combine harvesters) could travel through a housing estate on a road with speed tables etc! There is also the question of DEMOCRACY- why should the residents of the village</p>

		<p>south of the A47 be able to impose their wishes onto the 50 Ingarsby households- who have not been properly consulted about the road closure/re-routing. it is also very difficult to understand why the rural views and environment are less important to the north of the A47 than those behind Winckley Close, North Way and Stretton Lane. A public enquiry would be demanded on the proposed road closure. In addition the residents of Ingarsby Lane would probably have a valid claim for "Planning Blight".</p>
	<p>H7 page 21 Provision of dwellings for people in later life or having mobility issues</p>	<p>How will this be accomplished by building such properties on the opposite side of the A47 - a major trunk road, over 800 metres from all the facilities in the village- shop, post office, pharmacy, village hall, places of worship etc??</p>
	<p>Policy S2 Infrastructure</p>	<p>States that "a) Measures that address local traffic congestion and parking problems, particularly associated with the Primary School and other community buildings. b) Measures to promote pedestrian and cycle transport within the village and the broader plan area (see also Policy E3 and Community Projects). " Again this is thwarted for the proposed new developments by them being placed on the north side of the A47!</p>
	<p>Policy S3 provision of allotments page 23</p>	<p>The possible sale and relocation of this important community asset was NEVER included in the Community Questionnaire</p>
	<p>Policy S6 Construction of Golf Course page 25</p>	<p>This has been included to facilitate development of land for housing at Scraptoft. It seems to be at the behest and influence of the same large landowner who owns Site A. The site is far less conspicuous from a distance than Site A. It would be much more suitable for housing, as it is adjacent to the main village and in walking distance of the centre. It would be accessible on foot through the playing field area.</p>
	<p>4.4.1, Policy T1 Traffic Management. page 26. policy T2 page 27</p>	<p>Not in any helped by building north of A47- see previous comments.</p>

<p><b>Leicestershire County Council</b></p>		<p>Leicestershire County Council is supportive of the Neighbourhood plan process and welcome being included in this consultation.</p> <p><b>Highways</b> <b>General Comments</b></p> <p>The County Council recognises that residents may have concerns about traffic conditions in their local area, which they feel may be exacerbated by increased traffic due to population, economic and development growth.</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. 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. The current financial climate means that the CHA has extremely limited funding available to undertake minor highway improvements. Where there may be the prospect of third party funding to deliver a scheme, the County Council will still normally expect the scheme to comply with prevailing relevant national and local policies and guidance, both in terms of its justification and its design; the Council will also expect future maintenance costs to be covered by the third party funding.</p> <p>Where any measures are proposed that would affect speed limits, on-street parking</p>
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	<p>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><b>Flood Risk Management</b></p> <p>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"> <li>• Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation.</li> <li>• Use existing flood risk to adjacent land to prevent development.</li> <li>• Require development to resolve existing flood risk.</li> </ul> <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"> <li>• Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)).</li> <li>• Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map).</li> <li>• Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding.</li> <li>• 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.</li> <li>• Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk.</li> </ul> <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</p>
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	<p>SuDS design to be carried out. Consideration should also be given to blue green corridors and how they could be used to improve the bio-diversity and amenity of new developments, including benefits to surrounding areas.</p> <p>Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing watercourses and land drainage (including watercourses that form the site boundary) are retained as open features along their original flow path, and are retained in public open space to ensure that access for maintenance can be achieved. This should also be considered when looking at housing densities within the plan to ensure that these features can be retained.</p> <p>LCC in 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><b>Planning</b></p> <p><b>Developer Contributions</b></p> <p>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.</p> <p><a href="http://www.northkilworth.com/wp-content/uploads/2016/01/nk-draft-low-resolution-1.pdf">www.northkilworth.com/wp-content/uploads/2016/01/nk-draft-low-resolution-1.pdf</a></p> <p><a href="http://www.greatglen.leicestershireparishcouncils.org/uploads/175670305aeaf48650823074.pdf">www.greatglen.leicestershireparishcouncils.org/uploads/175670305aeaf48650823074.pdf</a></p> <p><b>Mineral &amp; Waste Planning</b></p> <p>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</p>
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		<p>and existing Mineral Consultation Areas are there to ensure that non-waste and nonminerals development takes place in a way that does not negatively affect mineral resources or waste operations. The County Council can provide guidance on this if your neighbourhood plan is allocating development in these areas or if any proposed neighbourhood plan policies may impact on minerals and waste provision.</p> <p><b>Education</b> 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 <b>Strategic Property Services</b> No comment at this time.</p> <p><b>Adult Social Care</b> 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><b>Environment</b> With regard to the environment and in line with the Governments advice, Leicestershire County Council (LCC) would like to see Neighbourhood Plans cover all aspects of the natural environment including climate change, the landscape, biodiversity, ecosystems, green infrastructure as well as soils, brownfield sites and agricultural land.</p> <p><b>Climate Change</b> The County Council through its Environment Strategy and Carbon Reduction Strategy is committed to reducing greenhouse gas emissions in Leicestershire and increasing Leicestershire's resilience to the predicted changes in climate. Neighbourhood Plans should in as far as possible seek to contribute to and support a reduction in greenhouse gas emissions and increasing the county's resilience to climate change.</p>
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	<p><b>Landscape</b>  The County Council would like to see the inclusion of a local landscape assessment taking into account Natural England's Landscape character areas; LCC's Landscape and Woodland Strategy and the Local District/Borough Council landscape character assessments. We would recommend that Neighbourhood Plans should also consider the street scene and public realm within their communities, further advice can be found in the latest 'Streets for All East Midlands ' Advisory Document (2006) published by English Heritage.</p> <p><b>Biodiversity</b>  The Natural Environment and Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, in the exercise of their duties, to the purpose of conserving biodiversity. The National Planning Policy Framework (NPPF) clearly outlines the importance of sustainable development alongside the core principle that planning should contribute to conserving and enhancing the natural environment and reducing pollution. Neighbourhood Plans should therefore seek to work in partnership with other agencies to develop and deliver a strategic approach to protecting and improving the natural environment based on local evidence and priorities. Each Neighbourhood Plan should consider the impact of potential development on enhancing biodiversity and habitat connectivity such as hedgerows and greenways.</p> <p>The Leicestershire and Rutland Environmental Records Centre (LRERC) can provide a summary of wildlife information for your Neighbourhood Plan area. This will include a map showing nationally important sites (e.g. Sites of Special Scientific Interest); locally designated Wildlife Sites; locations of badger setts, great crested newt breeding ponds and bat roosts; and a list of records of protected and priority Biodiversity Action Plan species. These are all a material consideration in the planning process. If there has been a recent Habitat Survey of your plan area, this will also be included. LRERC is unable to carry out habitat surveys on request from a Parish Council, although it may be possible to add it into a future survey programme.  Contact: <a href="mailto:planningecology@leics.gov.uk">planningecology@leics.gov.uk</a>, or phone 0116 305 4108</p> <p><b>Green Infrastructure</b>  Green infrastructure (GI) is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities, (NPPF definition). As a network, GI includes parks, open spaces, playing fields, woodlands, street trees, cemeteries/churchyards allotments and private gardens as well as streams, rivers, canals and other water bodies and features such as green roofs and living walls.</p> <p>The NPPF places the duty on local authorities to plan positively for a strategic</p>
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	<p>network of GI which can deliver a range of planning policies including: building a strong, competitive economy; creating a sense of place and promote good design; promoting healthier communities by providing greater opportunities for recreation and mental and physical health benefits; meeting the challenges of climate change and flood risk; increasing biodiversity and conserving and enhancing the natural environment. Looking at the existing provision of GI networks within a community can influence the plan for creating &amp; enhancing new networks and this assessment can then be used to inform CIL (Community Infrastructure Levy) schedules, enabling communities to potentially benefit from this source of funding.</p> <p>Neighbourhood Plan groups have the opportunity to plan GI networks at a local scale to maximise benefits for their community and in doing so they should ensure that their Neighbourhood Plan is reflective of the relevant Local Authority Green Infrastructure strategy. Through the Neighbourhood Plan and discussions with the Local Authority Planning teams and potential Developers communities are well placed to influence the delivery of local scale GI networks.</p> <p><b>Brownfield, Soils and Agricultural Land</b></p> <p>The NPPF encourages the effective use of brownfield land for development, provided that it is not of high environmental/ecological value. Neighbourhood planning groups should check with DEFRA if their neighbourhood planning area includes brownfield sites. Where information is lacking as to the ecological value of these sites then the Neighbourhood Plan could include policies that ensure such survey work should be carried out to assess the ecological value of a brownfield site before development decisions are taken.</p> <p>Soils are an essential finite resource on which important ecosystem services such as food production, are dependent on. They therefore should be enhanced in value and protected from adverse effects of unacceptable levels of pollution. Within the governments “Safeguarding our Soils” strategy, DEFRA have produced a code of practice for the sustainable use of soils on construction sites which could be helpful to neighbourhood planning groups in preparing environmental policies.</p> <p>High quality agricultural soils should, where possible be protected from development and where a large area of agricultural land is identified for development then planning should consider using the poorer quality areas in preference to the higher quality areas. Neighbourhood planning groups should consider mapping agricultural land classification within their plan to enable informed decisions to be made in the future. Natural England can provide further information and Agricultural Land classification.</p> <p><b>Impact of Development on Civic Amenity Infrastructure</b></p> <p>Neighbourhood planning groups should remain mindful of the interaction between new development applications in a district area and the Leicestershire County</p>
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	<p>Council. The County's Waste Management team considers proposed developments on a case by case basis and when it is identified that a proposed development will have a detrimental effect on the local civic amenity infrastructure then appropriate projects to increase the capacity to off-set the impact have to be initiated. Contributions to fund these projects are requested in accordance with Leicestershire's Planning Obligations Policy and the Community Infrastructure Legislation Regulations.</p> <p><b>Communities</b></p> <p>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.</p> <p>The identification of potential community projects that could be progressed would be a positive initiative.</p> <p><b>Economic Development</b></p> <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><b>Superfast Broadband</b></p> <p>High speed broadband is critical for businesses and for access to services, many of which are now online by default. Having a superfast broadband connection is no longer merely desirable, but is an essential requirement in ordinary daily life. All new developments (including community facilities) should have access to superfast broadband (of at least 30Mbps) Developers should take active steps to incorporate superfast broadband at the pre-planning phase and should engage with telecoms providers to ensure superfast broadband is available as soon as build on the development is complete. Developers are only responsible for putting in place broadband infrastructure for developments of 30+ properties. Consideration for developers to make provision in all new houses regardless of the size of development should be considered.</p> <p><b>Equalities</b></p> <p>While we cannot comment in detail on plans, you may wish to ask stakeholders to bear the Council's Equality Strategy 2016-2020 in mind when taking your Neighbourhood Plan forward through the relevant procedures, particularly for engagement and consultation work. A copy of the strategy can be view at: <a href="http://www.leicestershire.gov.uk/sites/default/files/field/pdf/2017/1/30/equalitystrategy2016-">www.leicestershire.gov.uk/sites/default/files/field/pdf/2017/1/30/equalitystrategy2016-</a></p>
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		2020.pdf
<b>Resident</b>	4.4 Traffic and Transport Policies T2 and T4	<p>Traffic issues (Section 4.4) Suggested actions concerning volume &amp; speed of traffic through Houghton village</p> <p>1. Dangerous junction (Ingarsby Lane - A47- Main Street, Houghton - Jet garage): Traffic meets from 5 directions &amp; misunderstandings concerning turning lanes and priority are frequent. A47 traffic often exceeds 40mph limit. Remedies could include traffic lights or roundabout, realignment of road junctions (or complete re-routing of access roads when new housing built), speed limit 30mph from Firs Road junction to public house.</p> <p>2. Main Street, Houghton: 20mph limit frequently exceeded, danger of meeting oncoming traffic on bends exacerbated by parked vehicles. School run &amp; rush hour times appear peak danger periods. Exhaust pollution may also be an issue to consider. Remedies could include: Traffic cameras to enforce 20mph restriction, parking restrictions on hazardous bends &amp; junctions plus, more importantly, strategic planning to minimise traffic using this busy rural rat-run east of the city.</p> <p>Proposed housing and golf course developments outlined in the Neighbourhood Plan could be expected to add substantially to the hazards outlined above. Remedial Policies T2 to T4 are, therefore, essential.</p>
<b>Natural England</b>		<p>Thank you for your consultation on the above dated 28/06/2017.</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 is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made..</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p>
<b>Chair of Governors Houghton on the Hill C of E school</b>	APPENDIX 2 Para 1.1.1 Page 54	<p>Last sentence: "It is very likely that the school will convert to an academy school and become part of a Multi-Academy Trust in 2017"</p> <p>As a result of recent developments, it is now known that this will not take place before 2018 and therefore it is requested that "2017" is changed to "2018".</p>
<b>Resident</b>	Site 3 page 11 North of A47	<p>Housing Policies – The selection of this site was ‘indicated as a preference by villagers’ as at that time of survey Winckley Close development did not have planning permission and therefore was ‘chosen’ to stop that development . Believe on 12 villagers selected the option. No development is needed for Site 3 at all in a reasonable period of time.</p>

	<p>Page 14</p> <p>Page 33</p> <p>Page 39</p> <p>Page 53</p>	<p>Any development to allow for minimum 'additional vehicular traffic to flow through Ingarsby Lane'</p> <p>Wildlife Area – A wide piece of headland was allowed by the owner as a wildlife area and prohibitive signs stating this erected. Field of site 3.</p> <p>Commanding pastoral views towards Quenby Hall will be lost if site 3 were developed</p> <p>New developments shall not be permitted which are likely to generate a significant increase in the volume of traffic using Ingarsby Lane</p>
<b>Agent/Landowner</b>	<p>3.3</p>	<p>We are grateful for the opportunity to respond to the 'Examination' version of the Houghton on the Hill Neighbourhood Plan (dated April 2017).</p> <p>This response is on behalf of Parker Strategic Land Limited who are promoting two sites for development within the Neighbourhood Plan: Residential Site 3 and the proposed Golf Course.</p> <p>We have been working with the Neighbourhood Plan Group to consider both these opportunities over the last 12-18 months and are pleased that the proposals appear as allocations in the Plan, albeit that the residential allocation of Site 3 is qualified, and we comment on that and the type of development proposed below. We aim to continue to work constructively with the Parish Councils and Neighbourhood Plan Group to bring these two opportunities forward and to ensure the proposals meet the expectations of the Councils and deliver very attractive, high quality and sustainable developments.</p> <p>We appreciate that the purpose of the consultation at this stage is concerned with the basic conditions and other legal considerations but we have several comments to make on the Plan which have not been made previously which we hope can be taken into consideration in its Examination. We are supportive of the Plan and generally in its objectives and the direction of the policies it puts forward. In general, our comments relate to the need to fully justify policies especially where they exceed current or standard requirements.</p> <p>Our comments are outlined below.</p> <p>3.3 Houghton Neighbourhood Development Plan Objectives</p> <p>The objectives do not refer specifically to the proposed golf course and we consider that given the scale of the proposal and the likely change this will bring to the village, that the golf course should be included specifically as an objective of the Plan. The proposal is made by the landowner but the Plan could include the proposal in the objectives given the</p>

	<p>Policy D2</p> <p>Policy H1</p>	<p>support provided for the proposal within the Plan.</p> <p>The objective might for instance state: 'to ensure the proposal for the golf course is delivered in an attractive and sustainable way that benefits the village and surrounding communities.'</p> <p><b>POLICY D2: PRESERVING THE ESSENTIAL CHARACTER OF HOUGHTON OUTSIDE THE CONSERVATION AREA</b>  While the intent of this policy is recognised, the policy and level of control that can be applied to changes to the built environment must reflect the NPPF and needs also to recognise that permitted development rights (PDR) allow for a wide range of changes to be made without planning permission.</p> <p><b>POLICY H1: GENERAL HOUSING PROVISION</b>  Our comments relate to clauses c) and f):  c) Minimises additional vehicular traffic flow through Ingarsby Lane, Deane Gate Drive, St Catharines Way, Main Street and Stretton Lane.  While we appreciate the objective here to ensure the traffic impacts on local routes is kept low, the term 'minimises' is difficult to judge and is inconsistent with the NPPF that states (para 32) that 'Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe'.  f) For sites where planning consent has not already been granted, Policies will ensure that the release of land for residential housing is managed so that the supply is not exhausted early in the plan period.  We return to this point specifically in relation to the Housing Policy H6 (which deals with housing Site 3). As the site allocations at Site 1 and Site 2 have planning permission, and the Winckley Close site has been granted permission but is not provided for within the Plan, this policy only now relates to site 3. The policy then holds the site back until 2025, but that date is not explained or justified.  g) All developments should include 25% bungalows and 75% houses unless evidence at the time demonstrates different proportions. The number of 4 and 5 bedrooomed houses should not exceed 10-20%, the balance being an appropriate mix of 1, 2 and 3 bedroom houses.  This policy sets a requirement for the type of dwellings to be provided on the housing sites, whether they have permission or not. We are aware that there is a strong preference by local people for bungalows to be provided. However, the level of housing provision within the village is only partly to meet village generated requirements. The local assessment of requirements undertaken by the Midlands Housing Association identifies a requirement for some 11 open market houses and 14 affordable houses over the next 5 years. If that is extended over the life of the plan (15 years) then it might result in some 75 houses generated for local requirements, although we appreciate that as the village grows this requirement may increase. The level of provision identified within the Harborough Local Plan for the village is some 170 new dwellings – so the local or village requirement is some 44% of the total. The Local Plan requirement is consistent with HEDNA, which does not, as far as we are aware, specifically set out requirements for</p>
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	<p>Policy H6</p>	<p>provision of 75 units should be provided for by the Plan and that no substantial harm would result from this, with the total housing provision increased to 210 dwellings.</p> <p><b>POLICY H6: DEVELOPMENT OF SITE 3</b></p> <p>This policy specifically refers to site 3. It states that development will be permitted subject to Policies H1, H2 and H3 and complying with three further criteria. We have commented on Polices H1, H2 and H3 above. We comment on the three addition criteria below.</p> <p>a) Development of up to 75 dwellings commencing no earlier than 2025.</p> <p>The Neighbourhood Plan does not give a justification for holding the development back to 2025. Indeed, there appears to be no further explanation other than to state at Policy H1 f) that 'land for residential housing is managed so that the supply is not exhausted early in the plan period'. There is no explanation in the supporting text. The Plan should provide the reasoned justification for holding the site back, and specifically to 2025.</p> <p>b) Consideration should be given to the provision of dwellings for people later in life or having mobility issues. We are supportive of this policy and this reflects our discussions with the Neighbourhood Plan Group on the potential of the site and we feel the site is particularly well suited to accommodate a proportion of development that can meet these needs. As we have stated elsewhere in our representations however, this can be encouraged through the Plan but specific limits or thresholds are not appropriate.</p> <p>c) In the event of the HDC New Local Plan (or any subsequent variation thereto) requiring Houghton to meet total housing numbers in excess of those provided following completion of the development of sites 1,2,3 and any windfall sites, then further development could occur on the remainder of the SHLAA area which contains Site 3, but should not commence before 2030.</p> <p>This element provides for further development on the northern part of the site within the SHLAA identified area but not allocated by the Plan at this stage, therefore a further 'reserve' site, but not before 2030. This requirement is triggered beyond the provision of the full amount of sites 1,2,3 and windfall sites, which includes Winckley Close (so 210 dwellings in total). The Policy seems therefore to be providing for the full amount of site 3 within the Plan, not just the residual remaining requirement after Winckley Close site has been taken into account. This should be clarified as Housing Policy H3 appears to only require part of Site 3, not its full provision, to make up the requirement to 170 dwellings.</p> <p>Certainly, we would agree that should additional provision be required then this is best met by extending Site 3 to the north, and that development of the first part of Site 3 to 75 dwellings should take this potential into account, and this might be provided for within Policy H6. We would recommend that this further land be specifically identified in Figure 4-2 which identifies the residential development sites.</p> <p>We would also state again, that the requirement of 170 dwellings identified by the Local Plan is not a maximum limit and the Neighbourhood Plan can provide for additional dwellings as it has identified sustainable opportunities to build new homes.. As we have stated, Site 3 does represent a sustainable development and the site could be brought forward to meet housing needs within a short timescale, and we do not see a justification in the Plan to limit the amount or the timing of the development.</p>
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	Policy H7	<p><b>POLICY H7: PROVISION OF DWELLINGS FOR PEOPLE IN LATER LIFE OR HAVING MOBILITY ISSUES</b></p> <p>This Policy provides a range of specific requirements to be met for developments designed to provide housing for those in later life or having mobility issues. The Policy requires all the criteria to be met and is very specific as to the requirements the development should meet, and we don't feel that this level of prescription is necessary. Indeed, it may hinder proposals which are otherwise beneficial from coming forward. Our specific comments are below.</p> <p>c) Properties will be a combination of owner-occupied and rented. Developers/providers will have their own requirements for the tenure mix of the properties. Some may be all owner-occupied developments and some may have a combination or be all rented. We do not believe it necessary to specify the tenure of the provision.</p> <p>d) Seven percent of properties, including bungalows should be built to accommodate wheelchair mobility and access in accordance with Building Regulations Part M (2015). We have commented on this through comments on Policy H2. We assume this Policy means 'at least' seven percent, as specified by Policy H2. Again, the requirement to exceed Part M(1) of the Building regulations needs to be fully explained and justified.</p> <p>e) A proportion of properties including bungalows should be designated sheltered dwellings, the precise number being determined by demand but 10 overall is a guide based on The Leicestershire Adult Social Care - Accommodation strategy for older people 2016-2026.</p> <p>and</p> <p>f) A proportion of properties should be constructed as whole-life homes. Again, these two elements are specific and we do not consider there is a need to specify with such detail the composition of the development. As this Policy is only likely to apply to Site 3 as the other sites are committed through existing permissions which do not specify provision of this type of accommodation (and retrospectively enforcing the Policy is unlikely to be achievable), it may be simpler to state that proposals for this type of accommodation should be subject to (and accompanied by) an assessment that fully addresses the potential for the various elements that are identified currently in the Policy. In this way, the Policy is flexible and positive but encourages a full exploration of the range of potential. As we say, by being overly prescriptive, the policy may discourage otherwise acceptable developments that can meet the village's and wider community's needs.</p>
	Policy S2	<p><b>POLICY S2: INFRASTRUCTURE</b></p> <p>This policy provides for supporting new infrastructure and contributions to off-site infrastructure and specifies three measures for specific support including measures to address parking and local congestion, promoting pedestrian and cycle transport and village community facilities.</p> <p>Appendix 2 of the Plan describes the facilities in the village but it does not identify any shortfall in requirements to meet the additional growth of the village, other than for additional burial grounds/facilities. The list provided at Section 6 (page 36) is not specifically related to the Neighbourhood Plan and represents an agenda of potential community projects. If there is an expectation that proposals will contribute to village infrastructure then it would be helpful to</p>

	Policy S6	<p>identify specifically the infrastructure and justify the contributions. Any contributions will be subject to the Community Infrastructure Levy Regulations 2010, as amended.</p> <p><b>POLICY S6: CONSTRUCTION OF A GOLF COURSE</b> As promoters of the golf course proposal, we are supportive of this Policy and have no major comments to make about how the Policy is presented.</p> <p>We have undertaken discussions with the Neighbourhood Plan Group representatives and with Harborough District Council on the proposals which are now well advanced. It is critical to the success of the district council's housing policies and specifically delivery of the Strategic Development Area (SDA) at Scraftoft for 1,200 dwellings within the emerging Local Plan (which includes the current golf course), that this land is allocated for the new replacement golf course. Policies within the Local Plan provide for the golf course. In general, there is a large measure of support for the proposal and both the promoter and Scraftoft Golf Club, who will occupy and own the facility, are committed to creating a first class, attractive and sustainable new facility that benefits the village and surrounding communities.</p>
	Policy T1	<p><b>POLICY T1: TRAFFIC MANAGEMENT</b> This policy states that new development will only be permitted where it will not cause a significant increase in the volume of traffic using Ingarsby Lane, Deane Gate Drive, St Catharines Way, Main Street and Stretton Lane (our underlining). However, as we have stated previously, the terminology is inconsistent with the NPPF that states 'Development should only be prevented or refused on transport grounds where the residual cumulative impacts of development are severe.' Significant increases may well be possible without being 'severe', and this would render the policy meaningless as the NPPF approach would be applied. We would recommend that the Policy is changed to be compatible with the NPPF and state that 'development will be prevented or refused where the residual cumulative impacts of development on Ingarsby Lane, Deane Gate Drive, St Catharines Way, Main Street and Stretton Lane are severe.'</p>
	Policy T2	<p><b>POLICY T2: TRAFFIC MANAGEMENT ALONG THE A47</b> This policy calls for a review of the management of the A47 through the village and includes for consideration of a range of potential measures that might improve the operation of the road and make it safe for pedestrians and other users. It does not however, state who should or would undertake the review. We assume the County Council as Highways Authority would be asked to undertake this in consultation with the District Council and Parish Councils. Nor does the Plan state what the trigger or limits might be that require the review or its timing. Three of the four major housing proposals have already received planning consent and will have approved proposals and no doubt have agreed s106 contributions to any necessary highways improvements by the time the Plan is adopted. It is not clear how the various packages of measures agreed through these consented applications now relates to the proposed review. It should also be noted, as we have said, that the County Council is the highways authority not the district or parish, and therefore the County Council would determine the acceptability of the measures and indeed the need for the review. As the majority of the housing proposals have been agreed without the need for the review, we would doubt</p>

	Policy E4 and E5	<p>whether a separate review is now necessary and that proposals for the remaining site without a planning permission, Site 3, can be dealt with through the planning application process rather than being conditional on the preparation of a wider A47 review.</p> <p>POLICY E4: MAXIMISING THE EFFICIENT USE OF WATER POLICY E5: MAXIMISING THE USE OF RENEWABLE ENERGY</p> <p>Both of these measures seek to ensure new developments provide for efficient use of water and provide photovoltaic collectors with a need, where they are not proposed, to provide evidence that they are not viable. It seems that these measures arise from the questionnaire survey rather than from any overall policy context at national or district level. There is no evidence that these policy requirements have resulted from any systematic assessment of the policy context or from a broader review of the needs or are supported by a viability assessment.</p> <p>The government has provided for authorities in making their plans, to specify a higher standard of water efficiency than provided for by the Building Regulations. Stating that 'where there is a clear local need, local planning authorities can set out Local Plan policies requiring new dwellings to meet the tighter Building Regulations optional requirement of 110 litres/person/day.' (Housing: optional technical standards, March 2015.) We assume that this is what is being sought, (hence the need for the Policy over and above the Building Regulations?) although the policy is not specific and simply refers to a 'high specification'. However, there does not appear to be any clear assessment of the local need or viability in the Neighbourhood Plan to justify the additional requirement.</p> <p>There isn't, as far as we are aware, a similar provision for increasing energy efficiency or requiring provision of renewable energy. The new HDC Local Plan (page 137) sets out a hierarchy in addressing provision, in priority order as follows:</p> <ul style="list-style-type: none"> <li>• passive design considered first as a means to reduce emissions,</li> <li>• then the energy efficient design of building services, including decentralised energy networks,</li> <li>• and finally, including renewable energy at building or site level.</li> </ul> <p>The Policy within the emerging Local Plan CC1 provides a framework against which to develop proposals to minimise impacts, but is not specific as to the methods or technologies.</p> <p>Again, we do not see any specific assessment of the Policy context for this proposal, or any assessment of particular local need or an assessment of the viability to justify the specificity of the Policy, which is inconsistent with the Policy in the Local Plan.</p>
<b>Resident</b>	Page 30 Table 1	<p>Possible options for the construction of additional public parking in the village</p> <p>There is an option for providing off-road parking in one of the major problem areas in Houghton, as follows:</p> <p>An area of land adjacent to the Co-op and opposite the pharmacy could provide at least 19 car parking spaces, possibly more depending upon layout, dependent upon an agreed financial arrangement and successful planning approval for change of use. More details can be provided if</p>



	<p>Section 3.2.1, The parish is viewed as a desirable and safe place to live by most of its inhabitants (Q1).</p> <p>Policy H1 General Housing Provision. P14</p> <p>Policy H3-H6: Housing Site Allocations</p>	<p>development on Houghton thereby undermining and rendering obsolete many key policies and objectives contained in the current plan.</p> <p>The current William Davis plan for 48 houses, which was granted outline planning permission by HDC in July, has several houses located within 5m of the MAHP whilst almost all of the 48 houses in the development lie within 40m of the pipe. Many residents objected to the development of housing on the Winckley Close site because of concerns about health and safety risk associated with building new housing inside MAHP inner or middle consultation zones. Such views would also apply to any housing development on any land in the Houghton Parish that adjoins the pipeline. No satisfactory assurances have been forthcoming from William Davis Ltd, HDC or Houghton Parish Council. Houghton may no longer be a safe place to live if this development goes ahead as planned. The recommendations of the HSE should have been incorporated in full in the NDP. The Winckley Close Residents Group request that the NDP is amended to incorporate the HSE's recommendations</p> <p>H1 states: "Permission for housing development within the limits to development, as defined on the Policies Map (Figure 4.2), will be granted if the development .....</p> <p>c) Minimises additional vehicular traffic flow through Ingarsby Lane, Deane Gate Drive, St Catharines Way, Main Street and Stretton Lane."</p> <p>Provision c) above is rendered obsolete by the Winckley Close planning approval which will add around an extra 100 private vehicles to the traffic load exiting Winckley Close. Traffic policy for Winckley Close, Ingarsby Lane, Deane Gate Drive, St Catharines Way, Main Street and Stretton Lane needs to be reviewed and mitigation measures agreed with developers and local authority bodies to deal with the adverse traffic implications that the Winckley Close development will bring.</p> <p>It is already noted that the Winckley Close site was not considered by the NDP Working Group as a potential site for housing development despite it having been the subject of multiple applications since January 2016. The overall objectives and policies of the NDP, if implemented in the Winckley Close development, would help to mitigate some on the more adverse implications of this development. It is important that William Davis Ltd is obliged to adhere to the NDPs stated objectives and policies and this can only be achieved if the NDP can (a) be amended to take account of the Winckley Close decision and then (b) brought into effect in time to exert influence on decisions on the Winckley Close development at the reserve stage of planning approval.</p> <p>The Winckley Close Residents Group recommend that an additional Policy statement is added to the NDP to set out policy and objectives for the Winckley Close development as a matter of urgency.</p>
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<p><b>Wm Davis Ltd</b></p>	<p>Objection to policy H1</p>	<p>William Davis Limited objects to proposed policy H1(g) as it conflicts with the "basic conditions tests".</p> <p>The strategy for delivering housing does not consider demand, thereby conflicting with basic condition A (on the basis of conflict with paragraph 50 of the NPPF), basic condition D (as it will result in the Plan as a whole not contributing to sustainable development), and basic condition E (conflict with Policy CS3 of the Core Strategy).</p> <p>Policy H1(g) of the Neighbourhood Plan is unduly prescriptive in seeking to precisely set the housing mix delivered in future developments. This is contrary to Core Strategy Policy CS3 (delivering housing choice and affordability) which requires the provision of market and affordable housing to be assessed on a site by site basis and have regard to local need.</p> <p>The supporting text to Policy H1 indicates that evidence in favour of the precise housing mix was informed by the village-wide consultation and the Strategic Housing Market Assessment. However, the SHMA makes it clear that its assessment of need is only intended to provide guidance and may be subject to local variations. Furthermore, the identified need is likely to change over time. We would also question how representative the village-wide consultation was.</p> <p>Moreover, there is no reference to demand in the Neighbourhood Plan. Paragraph 50 of the NPPF clearly states that demand is a key consideration when identifying "the size, type, tenure and range of housing that is required".</p> <p>The housing mix set out in the Neighbourhood Plan will have implications for the overall viability of development schemes by restricting the number of houses and the proportion of 4 and 5 bedroomed properties that can be delivered, contrary to demand. Without any viability assessment therefore the policy also conflicts with paragraph 173 of the NPPF which notes that careful attention should be paid to viability in plan making to ensure that policies do not threaten the viability of development.</p>

