

Medbourne 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	Full Representation
Anglian Water Services	Policy H1: Residential Site Allocations	<p>We have made an initial assessment of the available capacity within the foul sewerage network to accommodate the foul flows from these sites on an individual basis. Currently it is expected that these sites would not require improvements to the existing sewerage network to be made prior to the occupation of proposed dwellings</p> <p>We have no objection to the principle of residential development on the identified site allocations.</p>
Langton Developments Ltd	<p>Policy H1: Site 3</p> <p>Policy ENV2</p> <p>Policy ENV6</p>	<p>Criteria c) could be prohibitive for a scheme of four dwellings at this allocation. However, as the policy permits "about four dwellings", it is considered of sufficient flexibility to permit a scheme of five dwellings of which three are to be three-bed or smaller</p> <p>We are generally supportive of this policy but consider that it could be better worded to ensure consistency with other policies of the draft Neighbourhood Plan, in particular policy H1, to ensure that the allocations can be delivered. We would suggest the following revised wording: "Development proposals that affect them will be expected to protect or enhance the identified features in so far as is consistent with the other policies of the Neighbourhood Plan including Policy H1"</p> <p>As with policy ENV2, we are generally supportive of this policy but consider that it could be better worded to ensure consistency with other policies of the draft Neighbourhood Plan, in particular policy H1, to ensure that the allocations can be delivered. We would suggest the following revised wording: "Any loss or damage arising from a development proposal (or a change of land use</p>

		requiring planning permission) will need to be balanced against their significance as heritage assets having regard to the other policies of the Neighbourhood Plan including Policy H1"
Harborough District Council	Policy H1 (Site 1 – Livery Yard)	The policy says that the site will provide for 'about 12 dwellings' with 40% being affordable. Concern that if 10 or less dwellings are provided the affordable housing element would not be required because of National Policy.
	Policy H1 (Site 2 – Land at Main Street)	The density for this site is low especially as they are also asking for smaller properties. The consequence of this is that the proposal will not make best use of the land as there will be a small number of small dwellings on quite a large plot. The density could be increased in this location to at least 10 dwellings, although they could keep the smaller housing mix for a proportion of them.
	Policy H1 (Site 3 and 4)	Same comments for site 1 above.
	Policy H2	Concern that this contradicts paragraph 55 of the NPPF which makes it clear that residential development only in 'isolated locations' should not be supported unless it meets the exceptions. Clarification required about what is meant in part d) 'development suitable to a countryside location' NPPF para 55 does not rule out houses in the countryside provided that they are not isolated so they would in theory be ok outside of the development limits.
	Policy H4	Para 55 as identified above
	Policy H5	The Building Design Principles is repetitious of Core Strategy
	ENV2	Clarification required concerning what is meant by Environmental Survey (Trees/landscaping/Ecology?).

	ENV4	Perhaps they need to think about a wording change here as Permitted development means something different in DM terms to a scheme that has planning permission, unless the intention is to control matters that are PD which is not possible for an NDP.
	ENV8	This policy seems to imply that national companies cannot apply for renewable energy proposals in the Neighbourhood plan area. Clarification is required concerning this policy.
	ENV10	Repetitious of national policy
	CF1	Repetitious of national and Core Strategy
	TR1	Repetitious of national and Core Strategy
	E1	Needs clarification that it is class B of the 1987 Use Classes order they are referring to here otherwise it has no context. I presume where it says 'where planning permission is required' this removes the conflict with the PD rights that the government introduced which allows B uses to go into alternatives through the prior approval process as those are not planning applications. Perhaps this bit needs clarifying as they cannot control things that are PD through the neighbourhood plan.
Resident	Page 28 Policy H5	It is essential in my view that any new houses use materials that blend with adjacent houses and architectural styles and also compliment existing buildings. There have been some tragic examples of houses built in the 70's that made no attempt to do this and today look very out of place. Architect's vanity needs to be controlled.
	Page 32	Local green spaces - extremely important and precious
	Page 44 Policy Env7	It is important that we do not blight the precious landscape with hideous windmills. There is a place for these, preferably off shore but certainly not in this beautiful part of the country. We should also

	<p>Page60</p> <p>General Comments</p>	<p>not be taking good land out of food production for so called solar farm s. The government should legislate to ensure that all new warehouse and factory units have solar panelled roofs, therefore taking the need away from farm land.</p> <p>We do of course have a very successful renewable energy plant (bio digester) in the village.</p> <p>Strongly agree that traffic calming measures are required in and out of the village</p> <p>A very good document professionally put together, and accurately reflecting the communities views. Thanks to the hard work and commitment of the people involved.</p>
Roger Daulby Discretionary Trust	<p>Policy H1 re site 2 (page20)& Location map (page 21)</p> <p>Policy H1 Site 2 (page20) & Location map (page 21)</p>	<p>The plan's proposals relate to a period from 2018 to 2031 yet the proposals are very prescriptive. It cannot be helpful to the Local Planning Authority to be thus fettered, particularly in view of their obligations to be in line with national policy. 13 years is a long time and flexibility will be necessary.</p> <p>The Additional potential site to the South of Site 2 and to the rear of 41A Main Street has been omitted from the boundaries of Site 2 and should be included as a potential development site; as plans for the existing site (as shown on the Location Map) are well advanced, this additional site would naturally be brought forward at a later time.</p>
Leicestershire County Council	Highways General Comments	<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</p>

	Flood Risk Management	<p>highway measures associated with any new development would need to be fully funded from third party funding, such as via Section 278 or 106 (S106) developer contributions. I should emphasise that the CHA is generally no longer in a position to accept any financial risk relating to/make good any possible shortfall in developer funding.</p> <p>To be eligible for S106 contributions proposals must fulfil various legal criteria. Measures must also directly mitigate the impact of the development e.g. they should ensure that the development does not make the existing highway conditions any worse if considered to have a severe residual impact. They cannot unfortunately be sought to address existing problems.</p> <p>Where potential S106 measures would require future maintenance, which would be paid for from the County Council's funds, the measures would also need to be assessed against the County Council's other priorities and as such may not be maintained by the County Council or will require maintenance funding to be provide as a commuted sum.</p> <p>With regard to public transport, securing S106 contributions for public transport services will normally focus on larger developments, where there is a more realistic prospect of services being commercially viable once the contributions have stopped i.e. they would be able to operate without being supported from public funding.</p> <p>The current financial climate means that the CHA has extremely limited funding available to undertake minor highway improvements. Where there may be the prospect of third party funding to deliver a scheme, the County Council will still normally expect the scheme to comply with prevailing relevant national and local policies and guidance, both in terms of its justification and its design; the Council will also expect future maintenance costs to be covered by the third party funding. Where any measures are proposed that would affect speed limits, on-street parking restrictions or other Traffic Regulation Orders (be that to address existing problems or in connection with a development proposal), their implementation would be subject to available resources, the availability of full funding and the satisfactory completion of all necessary Statutory Procedures.</p> <p>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</p>
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	<p>Planning Developer Contributions</p>	<p>within the plan to ensure that these features can be retained. LCC, in its role as LLFA will not support proposals contrary to LCC policies. For further information it is suggested reference is made to the National Planning Policy Framework (March 2012), Sustainable drainage systems: Written statement - HCWS161 (December 2014) and the Planning Practice Guidance webpage.</p> <p>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>www.northkilworth.com/wp-content/uploads/2016/01/nk-draft-low-resolution-1.pdf http://www.harborough.gov.uk/downloads/file/3599/great_glen_referendum_version_2pdf</p>
	<p>Mineral & Waste Planning</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. Although neighbourhood plans cannot include policies that cover minerals and waste development, it may be the case that your neighbourhood contains an existing or planned minerals or waste site. The County Council can provide information on these operations or any future development planned for your neighbourhood.</p> <p>You should also be aware of Mineral Consultation Areas, contained within the adopted Minerals Local Plan and Mineral and Waste Safeguarding proposed in the new Leicestershire Minerals and Waste Plan. These proposed safeguarding areas and existing Mineral Consultation Areas are there to ensure that non-waste and non-minerals development takes place in a way that does not negatively affect mineral resources or waste operations. The County Council can provide guidance on this if your neighbourhood plan is allocating development in these areas or if any proposed neighbourhood plan policies may impact on minerals and waste provision.</p>

	Education	<p>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>
	Property Strategic Property Services	No comment at this time.
	Adult Social Care	It is suggested that reference is made to recognising a significant growth in the older population and that development seeks to include bungalows etc of differing tenures to accommodate the increase. This would be in line with the draft Adult Social Care Accommodation Strategy for older people which promotes that people should plan ahead for their later life, including considering downsizing, but recognising that people's choices are often limited by the lack of suitable local options.
	Environment	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.
	Climate Change	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

	Landscape	<p>contribute to and support a reduction in greenhouse gas emissions and increasing the county's resilience to climate change.</p> <p>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>
	Biodiversity	<p>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.</p> <p>Contact: planningecology@leics.gov.uk, or phone 0116 305 4108</p>
	Green Infrastructure	<p>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,</p>

	Brownfield, Soils and Agricultural Land	<p>woodlands, street trees, cemeteries/churchyards allotments and private gardens as well as streams, rivers, canals and other water bodies and features such as green roofs and living walls. The NPPF places the duty on local authorities to plan positively for a strategic network of GI which can deliver a range of planning policies including: building a strong, competitive economy; creating a sense of place and promote good design; promoting healthier communities by providing greater opportunities for recreation and mental and physical health benefits; meeting the challenges of climate change and flood risk; increasing biodiversity and conserving and enhancing the natural environment. Looking at the existing provision of GI networks within a community can influence the plan for creating & enhancing new networks and this assessment can then be used to inform CIL (Community Infrastructure Levy) schedules, enabling communities to potentially benefit from this source of funding.</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>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</p>
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	Impact of Development on Civic Amenity Infrastructure	<p>Neighbourhood planning groups should remain mindful of the interaction between new development applications in a district area and the Leicestershire County Council. The County's Waste Management team considers proposed developments on a case by case basis and when it is identified that a proposed development will have a detrimental effect on the local civic amenity infrastructure then appropriate projects to increase the capacity to off-set the impact have to be initiated. Contributions to fund these projects are requested in accordance with Leicestershire's Planning Obligations Policy and the Community Infrastructure Legislation Regulations.</p>
	Communities	<p>Consideration of community facilities is a positive facet of Neighbourhood Plans that reflects the importance of these facilities within communities and can proactively protect and develop facilities to meet the needs of people in local communities. Neighbourhood Plans provide an opportunity to;</p> <ol style="list-style-type: none"> 1. Carry out and report on a review of community facilities, groups and allotments and their importance within your community. 2. Set out policies that seek to; <ul style="list-style-type: none"> <input type="checkbox"/> protect and retain these existing facilities, <input type="checkbox"/> support the independent development of new facilities, and, <input type="checkbox"/> identify and protect Assets of Community Value and provide support for any existing or future designations. 3. Identify and support potential community projects that could be progressed.
	Economic Development	<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>
	Superfast Broadband	<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</p>

	Equalities	<p>essential requirement in ordinary daily life.</p> <p>All new developments (including community facilities) should have access to superfast broadband (of at least 30Mbps) Developers should take active steps to incorporate superfast broadband at the pre-planning phase and should engage with telecoms providers to ensure superfast broadband is available as soon as build on the development is complete. Developers are only responsible for putting in place broadband infrastructure for developments of 30+ properties. Consideration for developers to make provision in all new houses regardless of the size of development should be considered.</p> <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: www.leicestershire.gov.uk/sites/default/files/field/pdf/2017/1/30/equality-strategy2016-2020.pdf</p>
Penland Estates	General Comment	<p>I now understand that the Draft Plan has been sent to Market Harborough DC for their 6 week consultation period.</p> <p>I would like to reiterate that we fully support the scheme and confirm that the proposals are in line with the requirement of the village, namely that the site will be a combination of bungalows and houses.</p> <p>I look forward to a successful adoption of the Plan.</p>
Cllr Michael Rickman	POLICY H2 – The Limits to Development	<p>I have to raise a strong objection to the designated village boundary on Drayton Road. I have mentioned this previously to the chair of the committee but wish to formally put my point. When the application for the houses to be built on Drayton Road for 6 houses was applied for, it clearly showed a demarcation line of the site well before the last house in the village. Ref 14/01411/FUL.</p>

		<p>The NP now shows the plot extended to beyond the last house. Medbourne is a conservation village and as such the entrances, which set the scene of the village deserve protection of the strictest kind.</p> <p>The paddock was definitely classed as open countryside which has been spoilt already and we do not want it desecrated further.</p> <p>The neighbourhood plan should align with the planning permission granted on this site and should clearly show a limit to development and should not allow sprawl to happen.</p>
Amec Foster Wheeler on behalf of National Grid		<p>SUBMISSION ON BEHALF OF NATIONAL GRID</p> <p>National Grid has appointed Amec Foster Wheeler to review and respond to development plan consultations on its behalf. We are instructed by our client to submit the following representation with regards to the above Neighbourhood Plan consultation.</p> <p>Specific Comments</p> <p>An assessment has been carried out with respect to National Grid's electricity and gas transmission apparatus which includes high voltage electricity assets and high pressure gas pipelines, and also National Grid Gas Distribution's Intermediate and High Pressure apparatus.</p> <p>National Grid has identified that it has no record of such apparatus within the Neighbourhood Plan area.</p>
Gladman Developments Ltd		<p>This letter provides Gladman Developments Ltd (Gladman) representations in response to the submission version of the Medbourne Neighbourhood Plan (MNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. This letter seeks to highlight the issues with the plan as currently presented and its relationship with national and local planning policy.</p> <p>Legal Requirements</p> <p>Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the MNP must meet are as follows:</p> <p><i>(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.</i></p> <p><i>(d) The making of the order contributes to the achievement of sustainable development.</i></p>

- (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).*
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*

National Planning Policy Framework and Planning Practice Guidance

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.

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.

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.

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.

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

		<p>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 update 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 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 MNP's ability to meet basic condition (a) and this will be discussed in greater detail throughout this response.</p>
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		<p>Relationship to Local Plan</p> <p><u>Adopted Local Plan</u></p> <p>The adopted Development Plan relevant to the preparation of the Medbourne 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 Medbourne 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><u>Emerging Local Plan</u></p> <p>To meet the requirements of the Framework, the Council has commenced work on a new Local Plan, covering the period from 2011 and 2031. The plan was submitted to the Secretary of State on the 16th March and whilst the policies of the proposed plan have not yet been subject to Examination in Public, the strategic direction that the Council is proposing to take is clearly set out. The MNP should ensure policies are sufficiently aligned with the emerging Local Plan to minimise any potential conflicts when the plan is adopted.</p> <p>Within the proposed Harborough Local Plan, Medbourne is categorised as a one of seventeen Selected Rural Villages in the settlement hierarchy. This tier of settlements, along with the Rural Centres, will deliver 790 dwellings on non- allocated sites or sites allocated in neighbourhood plans. Policy H1 sets Medbourne a housing target of a minimum of 30 dwellings for Medbourne in the plan period to 2031.</p> <p>Medbourne Neighbourhood Plan</p> <p>This section highlights the key issues that Gladman would like to raise with regards to the content of the MNP 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</p>
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	<p>Policy ENV7: Protection of Important Views</p> <p>Policy ENV8: Ground Stability, Springs and Groundwater</p> <p>Strategic Environment Assessment</p>	<p>proposal. A balance judgement should be applied which has regard to the scale of any harm or loss against the significance of the heritage asset. Gladman suggest that for this policy to meet basic condition (a) the wording needs to be modified to include reference to the significance of a non-designated asset and the balanced judgement that should be applied, not a blanket restriction to development having an effect on a non-designate d heritage asset.</p> <p>Policy ENV7: Protection of Important Views</p> <p>This policy seeks to protect the identified important and valued views where development would be restricted except in exceptional circumstances. At this time Gladman have seen no evidence to support the protection of these views. Paragraph 109 of the Framework states that ‘the planning system should contribute and enhance the natural and local environment by protecting and enhancing valued landscapes...’ without defining what is considered a ‘valued landscape’. Numerous appeals have sought to bring clarity to this term and the consensus suggests that for a landscape to be considered as valued it must exhibit some demonstrable physical attributes which elevate its importance above simply being an area of undeveloped countryside. To warrant the inclusion of this policy Gladman suggest evidence will need to be produced to demonstrate how each of the views identified is elevated above merely being a view of a nice field.</p> <p>Policy ENV8: Ground Stability, Springs and Groundwater</p> <p>Whilst acknowledging the concerns raised within this policy Gladman consider this to be a strategic policy to be dealt with through higher-level plans and that it should be deleted.</p> <p>Strategic Environment Assessment</p> <p>Gladman previously submitted comments querying whether a Strategic Environment Assessment (SEA) screening assessment had been undertaken. Noting that this screening assessment had not been undertaken prior to the Regulation 14 consultation taking place Gladman are increasingly concerned that the results of this screening assessment can not be confirmed as Harborough</p>
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		<p>Borough Council (HBC) are waiting on comments from the statutory consultees. If any of the statutory consultees consider that a SEA will be required, an SEA should be produced which will need to be subject to further consultation. Noting HBC's conclusions in the screening assessment that the emerging Local Plan's SA does not identify any likely significant environmental effects as this has not yet been tested at examination and as the MNP allocates sites for development Gladman find it highly unlikely that an SEA would not be required to demonstrate how the cumulative effects of the proposed development within the neighbourhood plan area will not have significant environmental effects.</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) as the plan does not conform with national policy and guidance. 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>
Environment Agency	Policy H1: p20.	<p>Whilst the EA believes the Plan meets the basic conditions and other legal requirements we wish to point out that the access/egress to allocation site 3: Manor Farm Hallaton Road, appears to lie within Flood Zone 2 and/or 3 and therefore depending on the location of any future planning application red outline the Local Planning Authority will need to be satisfied the site passes the flooding sequential test and (again, depending on the location of the red outline) a Flood Risk Assessment may be required.</p>