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**From:**  
**Sent:** 04 February 2019 14:44  
**To:** localplan@harborough.gov.uk  
**Subject:** [EXTERNAL] Harborough District Local Plan - Schedule of Main Modifications

**This Message originated outside your organization.**

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Dear Sir/Madam,

Thank you for the opportunity to comment on the proposed main modifications to the Harborough District Local Plan. The following comments are submitted on behalf of Anglian Water.

I would be grateful if you could confirm that you have received this response.

Please note that Anglian Water provide water and wastewater services to part of Harborough District only. The views of Severn Trent Water should also be sought on the Local Plan.

#### **MM22 – GI4 Local Green Spaces**

We note that it proposed to amend the wording of Policy GI4 to clarify the development which will be allowed as an exception to general presumption against development.

The wording as drafted appears to limit development to buildings relating to sports/recreation uses, burial grounds/cemeteries, replacement buildings and affordable housing. However the policy as drafted would not allow for infrastructure provided by Anglian Water to be developed within a local green space as designated. This could unintentionally limit our ability to provide services to our customers.

To be effective it is suggested that the wording of Policy GI4 is amended to make it clear that the benefits of utility infrastructure provided by Anglian Water would override any impacts on the designated Local Green Spaces.

It is therefore proposed that the wording of Policy GI4 be amended as follows:

~~'2. The construction of new buildings on Local Green Space will not be permitted except in very special circumstances where the potential harm to the Local Green Space, including to its openness, special character and significance to the local community, is clearly outweighed by other considerations, such as the benefits of the development in enabling or enhancing public access to and use of the Local Green Space~~

**other than:**

**a) buildings providing appropriate facilities for outdoor, sport, recreation, cemeteries, burial grounds and allotments as long as the facilities preserve the openness of the Local Green Space, or**

**b) replacement buildings, provided the new building is in the same use and not materially larger than the one it replaces; or**

**c) limited affordable housing for local community needs, except in very special circumstances where the potential harm to the Local Green Space, including to its openness, special character, significance to the local community, and any other harm, are clearly outweighed by other considerations**

**d) utility infrastructure where the benefits override the potential impact on the designation'**

#### **MM27 – Policy IN4: Water Resources and Services**

We note that it is proposed to include reference to financial viability where it proposed to include measures relating to water reuse, water recycling and rainwater harvesting.



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**From:**  
**Sent:** 28 January 2019 14:21  
**To:** localplan@harborough.gov.uk  
**Subject:** [EXTERNAL] Harborough Local Plan- modifications consultation

**This Message originated outside your organization.**

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Dear Sirs,

Thank you for consulting the Canal & River Trust on the proposed modifications to the Harborough Local Plan.

I can advise that the Trust has no comments to make.

Regards,

Area Planner

T: 01929 200000

M: 01929 200000

E-Mail: [localplan@harborough.gov.uk](mailto:localplan@harborough.gov.uk)

Canal & River Trust, The Kiln, Mather Road, Newark, Notts NG24 1FB

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#### Cadw mewn cysylltiad

Cofrestrwch i dderbyn e-gylchlythyr Glandŵr Cymru <https://canalrivertrust.org.uk/newsletter>

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Dilynwch ni ar <https://twitter.com/canalrivertrust> ac <https://www.instagram.com/canalrivertrust>



# Daventry District Council

Lodge Road, Daventry, Northamptonshire NN11 4FP

Tel: 01327 871100 Fax: 01327 300011 DX21965

Website: [www.daventrydc.gov.uk](http://www.daventrydc.gov.uk)

Chief Executive

22<sup>nd</sup> February 2019

Strategic and Local Planning Team  
Harborough District Council  
Adam and Eve Street  
Market Harborough  
LE16 7AG

Team: Local Strategy Service

Please respond to:

Direct Line:

E-mail:

Our Ref:

Your Ref: L101

Dear Sir/Madam

## Harborough Local Plan 2011-2031 Main Modifications Consultation

Daventry District Council welcomes the opportunity to comment on the proposed main modifications of the Harborough Local Plan 2011-2031. A report on this matter was presented to the Council's Strategy Group at its meeting on 7<sup>th</sup> February 2019.

The only matter of concern to this Council is the proposed modification in respect of policy BE2.

### *MM15 – BE2: Strategic Distribution*

It is noted that the thrust of the modifications is to identify the land at Magna Park as an allocation as opposed to the criteria based approach. Whilst not referenced in the modified supporting text to the policy this is understood to be based on a document that sought to evaluate the need and demand for growth at Magna Park and its impact on other projects and public programmes. The report was undertaken by Icenii on behalf of Harborough District Council (document ref - BE2 EV1).

Whilst this report is not explicitly listed as a document upon which comments can be provided, given that the modifications are based on it, it is necessary and appropriate to make observations on it.

The report does not satisfactorily address the concerns previously raised by this Council about the need for the level of growth proposed and the need to properly assess the impact of the scale of growth on other projects and public programmes (including consented schemes), most notably the potential impact on delivery at DIRFT.

The Council's specific concerns with the report are as follows;

- The report identifies levels of impact (e.g. moderate at DIRFT) without further explaining how these judgements have been reached and then fails to adequately explain the implications of that level of impact.
- The approach of requiring a 'pipeline' of employment land and the conclusion that the absence of a future pipeline in the medium to long term results in a 'gap' in supply is not considered to be robust and over-estimates the level of need required that does not correlate with the needs identified in the LSDSS study.



INVESTORS  
IN PEOPLE | Silver

Therefore it is not considered that the changes made to the policy and the additional evidence undertaken have satisfactorily addressed the concerns previously raised. The policy, including the quantum proposed, is still not justified based on the additional evidence undertaken.

Furthermore there are concerns about the absence of any safeguard that required an assessment of the impact on other Strategic Rail freight interchanges. Whilst concerns were raised about how the approach to this in the submission version would be implemented in practice it was still considered to have a sound purpose. This is particularly important given the aforementioned concerns about the recently completed impact assessment.

Therefore as consequence of the above Daventry District Council **object** to the proposed modifications to policy BE2 on the basis that they are not justified.

We would welcome the opportunity to explore this issue further as part of the examination at a further hearing session.

I attach a copy of the Strategy Group report that agreed this response for information.

Yours sincerely

Principal Policy Officer (Planning)



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Wards affected:  
General

**Strategy Group – 7<sup>th</sup> February 2019**

**Harborough Local Plan 2011-2031 Main Modifications**

**Strategic Planning Issues**

**1. Purpose of Report**

To propose a response to the proposed main modifications to the submission Harborough District Local Plan.

**2. Advice**

<b>That it be RESOLVED:</b>	That a formal objection to the proposed modifications to the submission Harborough District Local Plan is made as outlined in section 4.6.
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**3. Introduction**

Harborough District's development plan currently comprises a Core Strategy covering the period 2006 to 2028 and the 2001 Local Plan. Harborough District Council (HDC) has declared that its Core Strategy is out of date in terms of policies relating to housing and economic development following the publication of the National Planning Policy Framework. Work has progressed on producing a comprehensive Local Plan covering the period to 2031 which, on adoption would replace the Core Strategy and 2001 Local Plan.

A proposed submission plan, covering the whole of Harborough District was consulted on and submitted for examination to the secretary of state. Daventry District Council objected to a policy within that plan, policy BE2 relating to Strategic Distribution (Strategy Group 12.10.17) and followed up the objection by appearing at the hearing session. Following a series of hearing sessions a schedule of minor modifications has been published for consultation between 15 January 2019 and Tuesday 26 February 2019. The schedule of modifications and supporting documents can be accessed at:

[https://www.harborough.gov.uk/downloads/file/4978/final schedule of proposed modifications v15 - as published 140119](https://www.harborough.gov.uk/downloads/file/4978/final%20schedule%20of%20proposed%20modifications%20v15%20-%20as%20published%20140119)

At this stage comments can only be made to the proposed modifications.

## **4. Information**

### **4.1 Policy BE2 Background**

As Policy BE2 (Strategic Distribution) was the only policy that the Council raised objections to previously it is the only policy of relevance in this report. In the Proposed Submission plan, policy BE2, that relates to Magna Park, sought to safeguard Magna Park for strategic storage and distribution and support additional strategic distribution up to 700,000m<sup>2</sup> where it meets certain criteria. These included that the site adjoins or extends Magna Park, supports or at least has no adverse impact on the viability and deliverability of existing or further Strategic Rail Freight Interchanges within or serving neighbouring authorities and Leicestershire and not lead to severe traffic congestion anywhere on the nearby strategic and local road network, particularly on the A5.

During the period when the Proposed Submission plan was being published and consulted on permission was granted by HDC for 380,000m<sup>2</sup> of strategic distribution at Magna Park (the modifications propose that this will be shown in the plan as a commitment).

### **4.2 Initial response**

As resolved at Strategy Group on 12<sup>th</sup> October 2017 the Council objected to the policy as it did not consider the policy to be justified. The need identified in the evidence base was for 152 ha of strategic storage and distribution across the whole of Leicestershire. The quantum of 700,000m<sup>2</sup> in the policy (based on planning applications) equated to a site area of 327 ha i.e. more than double the amount for the whole county. Furthermore it was not considered that approach in the policy was sound in that the capacity established in the policy should be one that would not have an adverse impact against the policy criteria. It was also identified that in order to establish the scale of development at Magna Park that would be acceptable further cross-boundary work with stakeholders was required to fully take into account the potential impact of different growth scenarios.

### **4.3 Hearing**

Hearing sessions were undertaken in October 2018 with officers from the Council attending the hearing session on employment which included a discussion on the approach set out in policy BE2. The Inspector identified concerns with the policy, stating that the level of growth in the policy should normally be identified as an allocation, not delivered through a criteria based policy, and justified by evidence. The Inspector also was not satisfied that a proper assessment had been made of the potential impact of the scale of development on other projects and public programmes, and therefore sought further evidence on this.

### **4.4 Study to assess impacts**

Officers were invited by officers from HDC to provide input into the brief for the work which was carried out by a consultancy, Icen. Icen subsequently carried out a piece of work entitled 'Policy BE2: Evaluation of Need, Demand and Impact'. This study

sought to assess the impact of allocating the full quantum (700,000m<sup>2</sup>) of floorspace at Magna Park on a range of local plans across Leicestershire, Northamptonshire and Coventry and Warwickshire. In respect of the plans of relevance in Daventry District it concluded there would be an impact on the West Northamptonshire Joint Core Strategy because DIRFT falls within the same market area as Magna Park but concluded this would be moderate. It identified a low impact on the emerging Part 2 Settlements and Countryside Local Plan.

#### **4.5 Main Modifications**

The schedule of main modifications identifies the changes to the policy in tracked change format. Policy BE2 is subject to significant proposed changes set out in full in Appendix 1. In summary the policy still supports up to 700,000m<sup>2</sup> however the committed sites are now identified as such and the remaining quantum (320,000m<sup>2</sup>) is proposed as an allocation on land North and West of Magna Park. The allocation policy includes a series of criteria which include a requirement for units to be greater than 9,000sqm (to ensure they are strategic), the protection of heritage assets, landscape and visual impact assessment, and the mitigation of impacts on a range of matters which include, amongst others, the highway network, air quality and nature conservation. The criterion which previously allowed for consideration of the impacts on the delivery of strategic rail freight interchanges is proposed to be deleted.

#### **4.6 Consideration and suggested response**

It is not considered that the changes made to the policy and the additional evidence undertaken have satisfactorily addressed the concerns previously raised. The policy, including the quantum proposed, is still not justified based on the additional evidence undertaken and consequently the proposed modifications to policy BE2 should be objected to.

Furthermore there are concerns with the report undertaken that sought to assess the Impact of the policy. The Inspector identified this as an area where further clarification was needed, and this was the root of this Council's concerns (i.e. the potential impact on delivery of DIRFT). However the report does not satisfactorily grapple with this, and there is a lack of explanation of what constitutes a "moderate" impact. There are also concerns about the approach to requiring a 'pipeline' of employment land and how this relates to needs previously identified.

In addition there are concerns about the absence of any safeguard that required an assessment of the impact on Strategic Rail freight interchanges. Whilst concerns were raised about how the approach to this in the submission version would be implemented in practice it was still considered to have a sound purpose.

It is therefore proposed that the Council's concerns should be reflected in an objection to the Main Modifications.

### **5. Implications**

**5.1 Financial** – Responding to the consultation would not of itself have any financial implications.



**5.2 Personnel** – Responding to consultations of this nature, and working co-operatively with nearby local authorities, is planned for as part of normal workloads.

**5.3 Legal/Constitutional** – The Council has a duty (the “Duty to Cooperate”) under Section 33A of the Planning and Compulsory Purchase Act 2004 to “engage constructively, actively and on an ongoing basis” on various matters, including strategic matters in the preparation of local plans. For plan making this duty ceases at submission. However officers from HDC have continued to liaise with DDC officers. Ongoing dialogue will also continue at Member level through the A5 working group.

**5.4 Environmental** – In accordance with the NPPF local plans must be prepared with the objective of contributing to the achievement of sustainable development. The plan is also subject to strategic environmental assessment as part of the sustainability appraisal required by European Union and UK law, respectively. Other than those issues raised above no issues have been identified which would materially adversely affect Daventry District.

**5.5 Policy** – Dealt with in the main body of the report.

**5.6 ICT** – None as a direct result of this report.

**5.7 Crime and Disorder** – Nothing has been identified in the HDC consultation document which suggests it would cause, or indeed improve, crime or disorder in Daventry District.

**5.8 Human Rights** – Nothing has been identified in the HDC consultation document which suggests it would adversely affect any of the Convention rights.

**5.9 Equalities** – Nothing has been identified in the HDC consultation document which seems likely to unlawfully discriminate against people with any of the protected characteristics.

## **6. Conclusions**

Harborough District Council have published a schedule of main modifications. These feature extensive modifications to policy BE2, Strategic Distribution, including allocating a further site to deliver the quantum of 700,00m<sup>2</sup>. It is suggested that the concerns regarding the approach to the modified policy, as set out in section 4.6 form the basis of the comments of this council to the consultation.

### **Executive Director (Business)**

**Background papers:** Harborough Local Plan 2011-2031 Proposed Submission. Report to Strategy Group, October 2017

**Previous minutes:**SG.56/17/04

**Contact Officer:**

File reference: L101

Harborough District Council  
Council Offices Adam & Eve Street  
Market Harborough  
Leicestershire  
LE16 7AG

**Our ref:** LT/2006/000111/CS-  
06/EW1-L01  
**Your ref:** Email 15 Jan 2019  
**Date:** 20 February 2019

Dear Sir/Madam

**Harborough Local Plan 2011-2031: Modifications Consultation**

Thank you for giving the Environment Agency the opportunity to comment on the Schedule of Main Modifications for your Local Plan and which was received on 15 January 2019.

We have reviewed the documents submitted as part of this consultation and have no comments to make.

Yours faithfully

.....  
**Planning Advisor**

Direct dial  
Direct e-mail

Environment Agency  
Trentside Offices Scarrington Road, West Bridgford, Nottingham, NG2 5FA.  
Customer services line: 03708 506 506  
[www.gov.uk/environment-agency](http://www.gov.uk/environment-agency)  
End

Strategic and Local Planning Team  
Harborough District Council  
Adam and Eve Street  
Market Harborough  
LE16 7AG  
via Email: [localplan@harborough.gov.uk](mailto:localplan@harborough.gov.uk)

Spatial Planning and Economic  
Development Team  
Highways England  
The Cube  
199 Wharfside Street  
Birmingham B1 1RN

Direct Line: 0800 010 100

19 February 2019

Dear Sir/Madam

### **Consultation on the Main Modifications to the Harborough Local Plan**

We welcome the opportunity to provide comments on the Main Modifications to the Harborough Local Plan which covers the period 2011-2031 and has been produced for public consultation. We note that these comments are the result of Examination hearings which took place in October 2018.

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 Harborough Local Plan, our principal interest is in safeguarding the operation of the M1 which routes through the west of the district, a small section of the A14 which routes through the south-west corner and the A5 which borders the boundary of the Plan area to the west.

The Schedule of Main Modifications sets out an updated housing allocation of 3,968 new dwellings (previously 4,660) in addition to the delivery of existing commitments and windfall development. It is our understanding that this change reflects the latest information on housing completions and commitments. We note that the housing allocation for Market Harborough and the Strategic Development Area (SDA) at Lutterworth has decreased, with the provision of 1,078 and 1,260 homes respectively, compared to the 1,140 and 1,500 dwellings allocated to the above sites in the Proposed Submission version of the Local Plan. We note that the total housing requirement for the borough (11,140 dwellings) is expected to be exceeded, with a provision of 12,985 homes to come forward during the Plan period. This is an increase of 185 dwellings from the housing supply set out in the previous document.

In our previous response to the Proposed Submission Version of the Harborough Local Plan in October 2017, we raised concerns regarding the close proximity of the Lutterworth SDA to M1 J20 and potential impacts on the operation of the SRN junction. In this regard we note that changes have been introduced to the improvements listed in paragraph 15.3.18 (now 15.2.20) of the local plan, which now suggests the

implementation of an upgraded roundabout at the A4303/A426 Rugby Road to replace the previously proposed signalised crossroads junction. As mentioned in our previous response there is a risk that if the junctions are not suitably coordinated then there could be potential blocking issues at the exit arms which could impact on the operation of M1 J20. As such the interaction between M1 J20 and the adjacent junctions will need to be closely monitored and carefully designed. We are keen to maintain close engagement with Leicestershire County Council and Harborough District Council throughout the development of the proposed schemes.

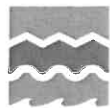
We further note that there has been little change in the allocation of employment sites with targets being raised slightly. A total of 76.8 Hectares (previously 75) has been allocated in order to meet the 51 hectare gross need identified.

With regards to strategic distribution sites (Policy BE2), we note that there has been a change in respect of the employment growth at Magna Park. Although no variation has been introduced to the total additional development quantum (700,000sq.m, including the 380,000sq.m already committed) or spatial distribution the Local Plan now allocates the remaining 320,000sq.m to the land North and West of Magna Park. Policy BE2 proposes to mitigate impacts on the SRN through improvement schemes at the Gibbet Hill Roundabout (A426 / A5) and the A5. It is our understanding that these improvements will be in line with schemes conditioned as part of planning application ref. 15/01531/OUT, which has been refused but is currently under appeal. We are keen to maintain close engagement with the council in the development of the proposed schemes.

We have no further comments to provide and trust the above is useful in the progression of the Harborough Local Plan.

Yours sincerely

Spatial Planning & Economic Development Team  
Email: s



Historic England

[LocalPlan@harborough.gov.uk](mailto:LocalPlan@harborough.gov.uk)

Our ref:  
PL00019351  
Your ref:

Telephone

26 February 2019

Dear [REDACTED]

**re: Harborough Local Plan Main Modifications consultation**

I refer to the above and have the following comments:-

**MM5: GD5:** Landscape and townscape character: *'b. avoids the loss of, or substantial harm to, features of landscape, townscape, historic/heritage, wildlife or geological importance, whether of national or local significance importance;'* It is considered that the original criteria was stronger, providing greater clarity.

**MM15 BE2:** Strategic Distribution

It would be helpful for heritage to be specifically mentioned in the LVIA section:-  
*'d. the layout and design is informed by a landscape visual impact assessment to minimise the impact on the character of the immediate and wider landscape, including heritage assets and their setting;'*

**MM18: HC1:** Built Heritage: Overall, '2' would not provide the strength of that proposed to be deleted. For example in relation to criteria c):-

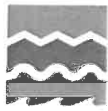
*'c) No viable use of the heritage asset can be found in the medium term through appropriate marketing that will enable its conservation; and'* How would 'medium-term' be interpreted?



Historic England, 2<sup>nd</sup> Floor, Windsor House, Cliftonville, Northampton NN1 5BE  
Telephone 01604 73 5460 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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Correspondence or information which you send us may therefore become publicly available.





Historic England

Please do not hesitate to contact me to discuss,

Kind regards,

Historic Environment Planning Adviser



Historic England, 2<sup>nd</sup> Floor, Windsor House, Cliftonville, Northampton NN1 5BE  
Telephone 01604 73 5460 [HistoricEngland.org.uk](http://HistoricEngland.org.uk)

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Correspondence or information which you send us may therefore become publicly available.



Our Ref: A090070-456  
Your Ref:

26<sup>th</sup> February 2019

**District of Harborough Council**

The Symington Building  
Adam and Eve Street  
Market Harborough  
Leicestershire  
LE16 7AG

**FOR THE ATTENTION OF '**

**HARBOROUGH LOCAL PLAN 2011-2031 – MAIN MODIFICATIONS CONSULTATION  
REPRESENTATIONS ON BEHALF OF HOMES ENGLAND**

WYG are instructed by Homes England, formerly Homes and Communities Agency to provide planning consultancy advice in respect of their land interests at land at Stretton Hall Farm, Great Glen ('the Site' hereafter), which lies within the boundary of the District of Harborough Council.

As you are aware, we prepared Hearing Statements and attended the Local Plan Examination Hearings on the 2<sup>nd</sup> and 3<sup>rd</sup> October 2018 to present Homes England's representation on Matter 2 'Housing Requirements' and Matter 4 'Homes to meet the needs of all the community'.

Following the closure of the Examination Hearings the Council has prepared a number of Main Modifications to the Harborough Local Plan in order to address matters raised by representatives to the Submission version of the Local Plan (dated September 2017). We have reviewed the Schedule of Main Modifications to the Harborough Local Plan (dated January 2019) but our client is disappointed to note that none of the matters set out in their Hearing Statements have been accepted by the Council.

Housing Requirements

In the Hearing Statement for Matter 2 we identified a potential unmet need for new housing during the Plan period both within the District of Harborough and the adjacent Leicester City Council area and proposed a 20% contingency figure for meeting future housing supply in the District.

In order to address this unmet need Homes England identified land at Stretton Hall Farm to deliver up to 200 residential units (and circa 100 extra-care units) coming forward within 5 years of the adoption of the local plan and a further 300 residential units within 5-10 years of the adoption of the local plan.





Based on the discussion at the Examination Hearing on the 2<sup>nd</sup> October, we understand that the Council's preferred approach to addressing any potential future unmet housing need is via a full or partial review mechanism set out in an amended Policy IMR 1 (**MM28**). Whilst the mechanism in amended Policy IMR 1 is noted it is considered that this approach will not address the potential housing supply requirement during the whole of the plan period but rather defer the detailed consideration of this matter until circa 5 years' time. This will not assist in the delivery of new homes (for all members of society) in the medium to longer term and will place significant emphasis on the Strategic Development Areas to deliver the future housing.

With alternative sites available our Client considers that a more proactive approach is to identify additional allocations or reserve sites for new housing development in this Local Plan.

#### Homes to meet the needs of all the community

Evidence provided in the Council's Hearing Statement on Matter 4 confirms that the District's need for specialist housing for older people to 2031 is estimated to be 63 dwellings per annum or 1,267 dwellings over the plan period. However, as at September 2018, only 317 dwellings or 45 dwellings per annum had been provided or granted planning permission. It is noted that these figures are revised in **MM11** to comprise 371 units (provide or granted planning permission) or circa 53 dwellings per annum.

In either case the Council has under-delivered in the provision of specialist housing for older people in the last seven years and will need to accelerate the delivery of such housing during the remaining years of the Local Plan to deliver 1,267 dwellings during the plan period. This matter was discussed with the Inspector at the Examination Hearing on the 3<sup>rd</sup> October.

Policy H4, as drafted, requires 10% of residential schemes of 100+ dwellings to provide specialist accommodation as part of the mix of housing types. The Council considers that this will result in approximately 280 specialist housing units leaving circa 600 units to come forward for the remainder of the plan period.

In the representations put forward at the Examination Hearing, Homes England advised that the need for specialist housing for the older people in Harborough District, especially in the social rented and mixed tenure market, is particularly acute due to the existing affordability issues. On this basis it was considered that planning policy in Harborough District needs to significantly encourage specialist housing for older people. Homes England suggested that an approach, similar to that set out in Policy H3 (Rural Exception Sites) should be adopted to ensure the delivery of specialist accommodation in small rural areas where open market housing will not normally be permitted.

The proposed modifications to Policy H4 (**MM11**) and Policy GD2 (**MM3**) will continue to focus specialist housing within or adjoining existing residential areas and built up areas. As acknowledged in revised Paragraph 5.7.3 of **MM11** the Council's SHLAA did not identify any specialist housing sites in the District. This is likely to be because any potential sites in or adjoining residential areas will be competing with new open market housing options, and thus will be faced with a viability challenge.





If the Council is determined to deliver the required level of specialist housing for older people during the Plan Period a more positive approach should be adopted, in addition to that set out in Policy H4 as proposed to be modified, to consider other potential sites.

The revised Policy H4 should also provide for the release of sites close to existing settlements or residential areas for specialist accommodation only. It is recommended that Policy H4 is modified to include a similar criteria to that proposed at Policy H3 Part 1 (c) and H3 Part 1 (d), namely:

*"permitted on sites that are proportionate in scale to, closely related to, and in safe and reasonable walking distance of a settlement and respects the character, form and appearance of the immediate vicinity and surrounding area".*

The above modification will provide the opportunity for a wider range of sites located close to existing residential areas and settlements to be considered for specialist housing for older people without undermining the Settlement Strategy set out in the plan. The proposed modification will, in combination with the remainder of Part 2 of the Policy H4, deliver an increased level of specialist housing during the Plan Period and beyond.

We should be grateful if you could review the modifications set out above and consider accepting them as further modification to the Harborough Local Plan. Should you have any queries or wish to discuss this matter further please do not hesitate to contact me on

Yours sincerely

Director  
For and on behalf of WYG

Please ask for:  
Email:  
Your ref: Local Plan Review  
Date: 25 February 2019



**Leicester**  
City Council

Strategic and Local Planning Team  
Harborough District Council  
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Dear Sir /Madam

### **Harborough Local Plan 2011 -2031. Main Modifications Consultation**

Thank you for consulting Leicester City Council on the proposed Main Modifications to the Harborough Local Plan, as set out in the 'Schedule of Main Modifications', January 2019.

The City Council has the following comments to make:

#### **MM25. Policy IN 2. Sustainable Transport: Page 43.**

Paragraph1. The City Council proposes that the word 'support' be reinstated instead of 'having regard'. A similar change of wording is proposed in paragraph 2 of the same policy (removing the word 'support' and replacing it with, 'having regard to'). It is considered that the previous wording is stronger, and that the new wording weakens the policy.

Paragraph 11.3.7. The City Council considers that the word 'Elsewhere' should be inserted at the start of the new wording within this paragraph. The paragraph mentions development within and adjacent to Market Harborough as well as Lutterworth. Including the word 'Elsewhere' also captures other development within the District.

#### **MM28. IMR1 Pages 45 - 48.**

Leicester City Council supports the provisions of the proposed modification, in taking forward a trigger mechanism for the review of the Harborough Local Plan, and working towards a Memorandum of Understanding, and a Statement of Common Ground.

**MM29 .Scraptoft North SDA Page 51. Policy 'SC1: Scraptoft North SDA'**

Paragraph O. It is suggested that the following additional wording is proposed at the end of this paragraph -

'in accordance with a highway delivery strategy to be agreed with the Local Planning Authority.'

This suggested wording is then consistent with paragraph L and M of the Highways and Transportation section of policy SC1.

yours sincerely

Planning Policy

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**From:**  
**Sent:** 22 January 2019 12:01  
**To:**  
**Subject:** [EXTERNAL] RE: HARBOROUGH LOCAL PLAN 2011-2031: MODIFICATIONS CONSULTATION

**This Message originated outside your organization.**

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Thank you Joanne and noted.

Kind Regards

Designing out crime officer  
Telephone  
Force Headquarters  
Email: !  
Address: Leicestershire Police Headquarters, Enderby, Leicester, LE19 2BX  
<http://www.leics.police.uk>

Strategic and Local Planning Team  
Harborough District Council  
Adam and Eve Street  
Market Harborough  
LE16 7AG

Consultant Town Planner

Tel:  
[n.grid@woodplc.com](mailto:n.grid@woodplc.com)

Sent by email to:  
[localplan@harborough.gov.uk](mailto:localplan@harborough.gov.uk)

06 February 2019

Dear Sir / Madam

**Harborough District Council: Local Plan Examination Main Modifications  
SUBMISSION ON BEHALF OF NATIONAL GRID**

National Grid has appointed Wood to review and respond to development plan consultations on its behalf.

We have reviewed the above consultation document and can confirm that National Grid has no comments to make in response to this consultation.

**Further Advice**

National Grid is happy to provide advice and guidance to the Council concerning our networks. If we can be of any assistance to you in providing informal comments in confidence during your policy development, please do not hesitate to contact us.

To help ensure the continued safe operation of existing sites and equipment and to facilitate future infrastructure investment, National Grid wishes to be involved in the preparation, alteration and review of plans and strategies which may affect our assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect our infrastructure. We would be grateful if you could add our details shown below to your consultation database:

Consultant Town Planner

[n.grid@woodplc.com](mailto:n.grid@woodplc.com)

Wood E&I Solutions UK Ltd  
Gables House  
Kenilworth Road  
Leamington Spa  
CV32 6JX

Development Liaison Officer, National Grid

[box.landandacquisitions@nationalgrid.com](mailto:box.landandacquisitions@nationalgrid.com)

National Grid House  
Warwick Technology Park  
Gallows Hill  
Warwick  
CV34 6DA

Yours faithfully

[via email]

**Consultant Town Planner**

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**From:**  
**Sent:** 01 February 2019 14:42  
**To:** localplan@harborough.gov.uk  
**Subject:** [EXTERNAL] Harborough Local Plan 2011-2031: Modifications Consultation

**This Message originated outside your organization.**

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**F.A.O.**

Thank you for consulting Natural England on the Modifications to the Harborough Local Plan. I can confirm that we have no comments on the modifications.

Regards

Lead Adviser  
Sustainable Growth & Marine Team  
East Midlands Area  
Ceres House  
2, Searby Road  
Lincoln  
LN2 4DT  
02080268500

[www.gov.uk/natural-england](http://www.gov.uk/natural-england).

**We are here to secure a healthy natural environment for people to enjoy, where wildlife is protected and England's traditional landscapes are safeguarded for future generations.**

**Natural England offers two chargeable services – The Discretionary Advice Service (DAS) provides pre-application, pre-determination and post-consent advice on proposals to developers and consultants as well as pre-licensing species advice and pre-assent and consent advice. The Pre-submission Screening Service (PSS) provides advice for protected species mitigation licence applications.**

**These services help applicants take appropriate account of environmental considerations at an early stage of project development, reduce uncertainty, reduce the risk of delay and added cost at a later stage, whilst securing good results for the natural environment.**

In an effort to reduce Natural England's carbon footprint, I will, wherever possible, avoid travelling to meetings and attend via audio, video or web conferencing.

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## Rugby Borough Council Comments to Harborough District Council Main Modification Consultation

MM1 - Modification is supported as it includes wider consideration of impacts that may affect neighbouring authorities outside of the District.

MM2 - See comments for modification MM15

MM15 - While the additional clarification on exactly how the proposed 700,000 sqm of B8 in and around Magna Park would be distributed and the addition of the criteria for development is welcomed the concern raised in our response to the previous Local Plan consultation remains.

This concern is centred around the lack of clear need for development of this quantum and lack of suitable evidence provided on the impacts to the wider B8 market of the allocation of such a large quantum of B8 development in this location. It is felt that the proposed modifications have not addressed this adequately. The additional evidence base document "Evaluation of Need, Demand, and Impact, 2018" concludes that there could be a moderate impact across Rugby Borough in terms of increased competition for occupiers and the potential for the loss of workforce to Magna Park. Given the lack of clear evidence that the 700,000 additional sqm is the result of an established need, is of concern.

MM19 - Modification is supported as it details the rivers Swift and Avon, dismantled railway lines and the Grand Union Canal, which extend into Rugby Borough and also form part of the Borough's Green Infrastructure proposals (available to view via our website).

MM23 - Loughton Hills, Lutterworth Lowland and Upper Soar character areas adjacent to boundary with Rugby Borough. Careful consideration will also need to be given to the impacts of wind turbine developments on areas within Rugby Borough.

There are a number of heritage assets within Rugby Borough near to the some of the areas stated. The requirement for detailed heritage assessments is supported to help give full consideration to those assets within Rugby Borough.

MM28 - The modification is supported as it allows the potential housing and employment need in the area to be properly considered along with its associated impacts, including upon the surrounding areas and transport network.



25 February 2019

Our ref: Harborough 7

Dear Sir/Madam

## Harborough Local Plan 2011-2031 Modifications Consultation

Thank you for the opportunity to comment on your consultation.

Severn Trent have no objections to the proposals outlined within the schedule of proposed modification V15. We would however like to note that we support the inclusion of reference to watercourses within Policy GD2: Settlement development, under bullet point 2 f. Watercourse form part of the natural drainage system for land and the retention of these features is vital to the sustainable management of surface water, and the provision of appropriate outfalls in accordance with the drainage hierarchy.

We would also encourage that watercourses are retained in open space with a buffer to physical obstructions such as buildings and fences to enable appropriate access for maintenance of the watercourse and any associate infrastructure (i.e. headwalls).

For your information we have set out some general guidelines that may be useful to you.

### **Position Statement**

As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.

### **Sewage Strategy**

Once detailed plans are available and we have modelled the additional capacity, in areas where sufficient capacity is not currently available and we have sufficient confidence that developments will be built, we will complete necessary improvements to provide the capacity. We will ensure that our assets have no adverse effect on the environment and that we provide appropriate levels of treatment at each of our sewage treatment works.

## **Surface Water and Sewer Flooding**

We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.

We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers.

To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

## **Water Quality**

Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency's Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.

## **Water Supply**

When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.

We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.

## **Water Efficiency**

Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.

We recommend that in all cases you consider:

- Single flush siphon toilet cistern and those with a flush volume of 4 litres.
- Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.

- Hand wash basin taps with low flow rates of 4 litres or less.
- Water butts for external use in properties with gardens.

To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website

<https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/>

We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.

We hope this information has been useful to you and we look forward in hearing from you in the near future.

Yours sincerely

Strategic Catchment Planner