

Hallaton 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
<p>Primary Care Contracts Manager East Leicestershire & Rutland Clinical Commissioning Group Leicestershire County Council Room G30, Pen Lloyd Building County Hall, Glenfield Leicester LE3 8TB</p>	<p>20 - Housing Provision</p>	<p>Any new housing development in the area will impact on the provision of healthcare services in the area. In order to manage the impact the practices will require adequate s106 funding.</p>
<p>The Environment Agency Scarrington Road Notts</p>	<p>Policy Env 8</p>	<p>The Inspector may wish to consider whether the 'Biodiversity Net gain' should be specifically included in this Policy</p>
<p>Fisher German LLP The Estates Office Norman Court Ashby De La Zouch Leicestershire LE65 2UZ</p> <p>On behalf of Resident</p>		<p>Hallaton Neighbourhood Plan We write on behalf of our clients xx in respect of their land interests at East Norton Road, Hallaton. We previously submitted representations to the Regulation 14 Hallaton Neighbourhood Plan in September 2019, outlining the flawed assessment of housing sites, particularly the assessment of the group's preferred reserve site at land at Cow Close and our client's land at East Norton Road. Despite substantive representations outlining the inconsistencies within the groups evidence base, no changes have been made to the Plan. We also note the short period between the close of the Regulation 14 consultation and the decision to submit the Plan to Harborough District Council. Such a short period is certainly not standard and brings into question to what extent representations have been considered in advancing the Plan. Having read the response to our Regulation 14</p>

		<p>representations, we do not feel that the issues highlighted have been adequately addressed and given the lack of changes to the Plan and its evidence base, we consider our previous representations continue to apply. As such, they have been appended to this letter and should be considered as our formal response to this consultation. Having regard to the basic conditions, we consider the flawed evidence base and thus judgements made within the Plan, specifically the allocation of land at Cow Close ahead of our client's land mean the Plan cannot be considered to meet basic conditions, as required at Paragraph 37 of the Framework and as set out in National Planning Practice Guidance.</p> <p>A. <u>Having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan); and</u></p> <p>The NPPF and associated practice guidance outline that planning is evidence led. Paragraph 31 sets out that "The preparation and review of all policies should be underpinned by relevant and up-to-date evidence." Planning Practice Guidance paragraph 040 sets out "Proportionate, robust evidence should support the choices made and the approach taken". Clearly given the flaws in the evidence base and how this has informed the allocations within the Plan cannot be seen to align with this basic condition.</p> <p>D. <u>The making of the order (or neighbourhood plan) contributes to the achievement of sustainable development</u></p> <p>If made, this Neighbourhood Plan would seek to promote less suitable land for development. This is clearly an unsustainable approach to take and would not therefore contribute to the achievements of sustainable development. On this basis the Plan cannot meet this basic condition.</p> <p>As detailed in the attached representations, the evidence base which supports the Neighbourhood Plan is flawed. This has led to allocations which are also flawed. For the reasons set out above the Plan does not meet the basic conditions therefore should not proceed to referendum.</p> <p>We invite the Examiner to fully explore the above issues and request the opportunity to be involved in any examination proceedings, be they written representations or through a hearing.</p> <p>Representations</p> <p>1.1 These representations have been prepared on behalf xx in respect of their land interests at East Norton Road, Hallaton.</p>
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Figure 1: Google Earth extract outlining land promoted by Mrs Brankin-Frisby and Hastings

1.2 The Hallaton Draft Neighbourhood Plan has been in preparation for a number of years now, with the Neighbourhood Plan Group having already undertaken a consultation on a pre-submission, Regulation 14 consultation almost a year ago. At this point in time the Plan sought to allocate a single site of over 30 dwellings. Since then however, there have been a number of changes, with the site originally selected as the sole allocation no longer allocated and three smaller sites selected. The former allocation now serves as a reserve site.

1.3 Planning regulations stipulate that any Neighbourhood Plan must be in general conformity with the Development Plan for the area. In Harborough this consists of the recently adopted Harborough Local Plan (2019). The Local Plan designates Hallaton as a Selected Rural Village and with Policy H1 outlining that Hallaton will deliver a minimum of 30 new dwellings, during the Plan period.

1.4 Whilst it is understood that the residual requirement for the settlement is now lower, having regard for extant planning permissions, the Neighbourhood Plan has sought to take a proactive and pragmatic approach to development, allocating numbers in excess of the minimum required. This is an approach which is consistent with national policy on the supply of housing and also serves to safeguard the Neighbourhood Plan in the longer term, particularly having regard for matters such as the future use of the standardised methodology for establishing Local

	<p>Policy HBE2</p>	<p>Housing Needs and also the unmet need emanating from Leicester City, both of which may increase housing need to Harborough District in the future. Such increases could also increase the housing need in Hallaton.</p> <p>1.5 The Neighbourhood Plan also seeks to allocate a reserve site, again to safeguard the plan in the longer term. Whilst we agree with this strategy, we do not believe the reserve site selected is the most appropriate and instead argue that the land at East Norton should be allocated as a reserve site.</p> <p>02 General Comments Policy HBE 2: Limits to Development</p> <p>2.1 The proposed Limits to Development is not consistent with its own methodology in that it bisects residential gardens at a number of points. This is particularly the case at Hazel Grove, where two gardens are clearly not followed.</p> <p>2.2 The Methodology for designating the Limits to Development on page 19 (Part B) states that defined physical features such as gardens have been used to defined boundaries. Part E states that large curtilages of buildings which relate more to the character of the countryside than the built form have been excluded.</p> <p>2.3 As can be seen from the above, the land to the north of the proposed Limits to Development are used and maintained as residential gardens. Whilst they are large gardens, to count as outside the proposed Limits to Development they would need to relate more to the character of the countryside. Clearly the gardens are maintained and used as residential gardens, as demonstrated by the various residential paraphernalia as can be seen above. If one was to be standing at any</p>
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Proposed
Limits to
Development

Figure 2: Proposed Limits to Development

HBE3

part in these gardens the overriding sense would be that of a residential garden and not the open countryside. It cannot therefore be said that these gardens will relate better to the countryside than the residential dwellings they belong too. Having regard for the methodology these areas should therefore be designated as within the proposed Limits to Development.

Housing Provision & Residential Allocations

ENV5

2.4 The Neighbourhood Plan takes a positive and pragmatic approach to the delivery of housing and the benefits new housing may bring. It allocates in excess of the number of dwellings technically required and also provides a reserve site for longer term flexibility and safeguarding. The consultation document proposes to allocate 3 sites, 2 of 4 dwellings and a single site of 2 dwellings. It also allocates a reserve site. We comment more about these allocations in section 3.

Ridge and Furrow

2.5 It is not clear within the consultation documents as to the methodology used in scoring the various ridge and furrow

	<p>fields on page 44 or who has completed the assessment. It is not clear for example whether these are results extrapolated from <i>Turning the Plough 2</i> or whether it is work completed by the Group. This should be clarified in any future consultations.</p> <p>2.6 We do not agree with assessment of our client's land (122) as very good preservation, where comparable land at 111 (reserve site) is only scored as good preservation. There is very limited difference between the two and as such we cannot justify the differing scoring applied. CFA3: New School</p> <p>2.7 The ambitions of the community to deliver a new modern school to replace the constrained existing school are supported. Clearly there are a number of issues with the existing school, causing issues for staff, students, parents and local residents. A new school on a better located site will have considerable benefits for the community as a whole. This is discussed in more detail in Section 4.</p> <p>03 Land at East Norton Road, Hallaton</p> <p>3.1 We consider the land at East Norton Road represents a logical and sustainable location for housing growth. Having reviewed the Neighbourhood Plan's evidence base on site selection we consider there to be a number of flaws which has led to the conclusion that land at Cow Close was the most suitable site for selection as a reserve site. Similarly, flaws have incorrectly reduced the scoring of our client's site. We have covered each topic in which we consider there is an error in turn below, following the order they appear on the assessment proformas for ease of reference. For clarity and brevity, we will refer to the sites by the reference assigned to them on the assessments, therefore the current proposed reserve site at Cow Close is named H7, whilst the land at East Norton Road, as delineated at Figure 1, is H17. A completed proforma is included at Appendix 1. Where we have not commented on a criteria, we have no comments to the scoring used at this stage.</p> <p>Site area and capacity</p> <p>3.2 Site H7 is incorrectly scored as a red, it should be an amber as for circa 11 units.</p> <p>Adjoining Uses</p> <p>3.3 Inconsistency of scoring between the sites. H7 is within the open countryside and surrounded by arable fields on three sides. Furthermore, the development of which would clearly extend the village envelope to the east, meaning it should be scored as red.</p> <p>3.4 H17, which was scored as a red, benefits from a close relationship with the edge of the existing village. To the south the site adjoins two residential properties/gardens as well as a small contained paddock. The western boundary is adjacent to East Norton Road. According to the methodology used, we consider both sites should be scored as a red. There is no reason as to why H7 should score better than H17.</p>
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Topography

3.5 Whilst there is a slight slope at H17, this is not considered to be particularly difficult to deal with and developers are fully able to deliver schemes on such slopes with limited mitigation. As such we consider H17 should be scored a green. We certainly do not believe that H17 which is only a slight slope should be scored as equal to H7. H7 is on a steep slope which will require significant mitigation, which may have potential issues for the site's viability. H7 therefore should remain as an amber.

Ridge and Furrow

3.6 As discussed at paragraphs 2.5 and 2.6, we do not believe there to be a significant difference between the ridge and furrow present on H7 and H17. It is not clear what methodology has been employed by the group in coming to this conclusion and what evidence supports this scoring. Clearly both sites show signs of historic farming methods, the remnants of which are relatively common within the locality and the region. There is no greater significance to ridge and furrow on H17 to warrant a red score when compared to that present on H7. Both sites should therefore be scored as amber.

Landscape and Visual Impact

3.7 Both sites are in a prominent position. H7 is on top of a steep slope which will have an overbearing, urbanising impact on the approach to the village on Horninghold Road. Currently views approaching the village along this road have very little visibility to the built form of the village. The delivery of a housing site at H7, in front of a mature tree line therefore will have a significant urbanising impact on this approach, as can be seen at Figure 3 below. Figure 3: Approach to Hallaton on Horninghold Road.



Figure 3: Approach to Hallaton on Horninghold Road. Site H7 is visible to the left (Source Google Street View)

3.8 When approaching the village along East Norton Road H17 is experienced in the context of views of the existing

properties on the edge of the northern edge of village, which are somewhat more visible than on the approach to Hallaton on Horninghold Road (Figure 4)



Figure 4: Approach to Hallaton on East Norton Road. Site H17 is visible to the left (source Google Street View)

3.9 Furthermore, the nearby Recreation Ground and Pavilion (Figure 5) provide a further urbanising influence to the site and to the village when approaching from the north. As such, it is considered that the site has an 'edge of settlement' rural' character.



Figure 5: Hallaton Recreation Ground (source Google Street View)

3.10 Whilst the site is within the High Leicestershire Landscape Character Area and views to surrounding countryside are predominantly experienced from East Norton Road, a sensitively designed and landscaped development in this location would ensure that important views are retained and the appearance of development in the landscape is softened.

	<p>3.11 Moreover, as the Harborough District Landscape Character Assessment states, small scale development (such as the 20 dwelling scheme proposed) is able to come forward in the Landscape Character Area without any adverse impact on the landscape.</p> <p>3.12 Having regard for the above factors we do not believe there is justification to score H17 as performing worse than H7. We consider a fair assessment would be to score both sites as an amber.</p> <p>Relationship with existing pattern of built development</p> <p>3.13 The methodology outlines that for a site to score green, it must be visible from a small number of properties. Clearly both H7 and H17 are not widely visible from many properties at all, meaning it could be argued that both should score as green. However, only H7 is scored as a green. The methodology continues that to score as an amber, sites need to be “visible from a range of sources mitigated through landscaping or planting”. To score a red, sites must be of “prominent visibility” and “difficult to improve [mitigate]”. We do not agree that site H17 can score any worse than H7. Whilst East Norton Road is more open than Horninghold Road, both sites would be equally prominent on the approach to the settlement (see Figures 3+4). Beyond East Norton Road, H17 is not widely visible at all. It is unclear therefore why H17 has been deemed to score a Red. Furthermore, from the few viewpoints H17 can be seen from, landscaping and planting can be used to mitigate such views. Having regard for the Groups own criteria, we would argue that both sites must therefore score either green or amber. We consider amber to be a fair assessment for both sites.</p> <p>Safe pedestrian access to and from the site</p> <p>3.14 Perhaps the most concerning example of the inconsistency and incorrect scoring used by the Group to inform the emerging Plan is the scoring attributed to safe pedestrian access to and from the site. The criteria for a green score is that there must be an access to an existing path. Clearly H17 benefits from access to an existing path on the correct side of East Norton Road. Accordingly, there is no justification for the Groups scoring of an amber against this criterion. H17 should score a green. It could be argued that the topography of H7 would mean it could impede safe access, particularly for the disabled or those with limited mobility, but against the methodology as written both sites should be scored as green.</p> <p>Safe vehicular access to and from the site</p> <p>3.15 Safe highways access can be provided easily from H17. The highways concerns cited in the SHLAA regarding the sites on the north-west of the village stem from the single track nature of Goady Road, Hunts Lane, Tugwell Lane, Churchgate and North End which were identified as not being suitable to cater for additional traffic. However, because H17 is not accessed via a single track lane, instead by East Norton Road, there would not be such constraints from a highways perspective. Clearly East Norton Road is a suitable road to access a new development, it is of an acceptable</p>
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		<p>width and is fairly straight, affording good visibility splays. The site should therefore score a green. H17 was not assessed by the latest SHLAA (2015), therefore it is incorrect to utilise the SHLAA to assess H17.</p> <p>Impact on existing vehicular traffic</p> <p>3.16 The methodology paper outlines that to score a green, sites' impact on the village centre should be minimal. Site H17 is to the north of the village on East Norton Road. To access the A47 from H17, one need only turn right from the site onto East Norton Road and through Moor Hill. This will facilitate journeys to Leicester, which is the most likely destination for work and leisure trips, without needing to go into the centre of Hallaton. Similarly, for destinations such as Uppingham, which is also likely a generator of trips from Hallaton. Any vehicular trips into, or through Hallaton are likely to be infrequent. Considering this, we believe the site should score a green.</p> <p>Gas, oil, pipelines, networks and electricity transmission network</p> <p>3.17 The methodology outlines that the site should be scored as a green if the site is unaffected by the presence of utilities infrastructure. Whilst there is a telegraph cable on the edge of the site, we are content that a scheme can be brought forward without needing to interfere with this infrastructure. As such the site should score a green, as the site is unaffected.</p> <p>Site Character</p> <p>3.18 Whilst not strictly a criterion on the Groups proforma, we consider that site H17 has incorrectly been considered as being a rural site without due consideration to its actual relationship with the village. In particular with regard to how the site would be predominantly experienced, from East Norton Road. The Neighbourhood Plan Group have repeatedly sought to establish the site as isolated from the village, both through its proforma assessments and also through the drawing of the limits to development. Notwithstanding this however, when one considers the site and its relationship with the entrance to Hallaton from East Norton Road, we consider the site is clearly settlement edge in character.</p> <p>3.19 Views into the village are well established from East Norton Road (particularly compared to H7) and any development on the site would be seen in this context. Furthermore, the maintenance of the green spaces and fencing to the north of Hallaton (around East Norton Road) clearly relate and bare the character of a village, rather than the open countryside. Figure 6 below, shows the view into the village from the current access from H17. Figure 6: Gateway view into Hallaton from entrance of H17 (source Google Street View)</p>
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Figure 6: Gateway view into Hallaton from entrance of H17 (source Google Street View)

3.20 We consider that the settlement edge character of the site, combined with the urbanising features at the Hallaton Recreation Ground offer an opportunity to deliver a gateway scheme into the village. Such a site can be designed to improve the prominence of Hacluit's Pond, through removal of the metal fencing currently at H17's entrance (see Figure 6). We consider there are opportunities through sensitive residential development to improve the entrance into the village which would further weigh in favour of the site.

Outcome

3.21 Through our review of the site scoring of site H7, we concur the site should remain scored as a 7.

3.22 Having reviewed the scoring undertaking for site H17, we consider that it has been scored very lowly without justification. H17 was only afforded a score of 2 by the groups scoring exercise. Through the above corrections, we consider that site H17 should score 11. This could actually be increased further if, for example, a green was attributed to the criteria "relationship with existing pattern of built development", due to the limited numbers of properties from which the site is visible. Having regard for this score, the site is worthy of serious consideration as a reserve site ahead of H7.

04 New School Site

4.1 As referenced earlier in these representations, we note and support the Neighbourhood Plan Groups ambitions to deliver a new modern, fit for purpose primary school to serve the village and the wider catchment. Clearly the current school has a number of issues, including the need to rent rooms in neighbouring properties to serve as classrooms, no

		<p>on-site sports hall and difficult access for parents and staff on narrow historic streets. It would be within the best interests of everyone if a new school site could be found and a new school funded. We consider there is a potential opportunity to explore delivery of a new school site at land at East Norton Road, between the land promoted for residential development and the recreation ground. A new primary school at this location will benefit from a number of positives, particularly when compared to the school's current location.</p> <p>4.2 A new school site in this location could benefit from both safe access from East Norton Road. It could also provide sufficient parking for staff and a drop off area for pupils to be dropped off at, particularly those coming from wider in the catchment or out of catchment. The current school's location on Churchgate is highly constrained. Churchgate is a narrow road which has on-street parking to facilitate local residents. When parents drop their children off at the school, this causes significant issues for parents trying to park and manoeuvre on the street, to such an extent as the school has now asked parents to park at the bottom of Churchgate. This has however not solved a problem, simply moved it. The provision of a new school will therefore provide significant benefits with regard to access and parking to pupils, staff, parents and existing residents of Churchgate.</p> <p>4.3 A new modern primary school could include a multi-purpose hall which can serve both as a sports hall for indoor play, for assemblies and a dining area. Currently during the winter a room is rented at Stenning Hall and pupils are walked there before and after P.E., which reduces the time children can spend actually exercising. A new school could include such facilities on the site. Furthermore, such facilities could be linked with the neighbouring recreation ground to increase the offer available to the school, such as badminton and other indoor sports. Such partnership working could provide valuable financial income and improve community support for the scheme.</p> <p>4.4 A new school would be built to modern standards of energy efficiency which may reduce running costs likely to be attributed to the current site. Furthermore, maintenance costs may be reduced through the delivery a new modern facility.</p> <p>4.5 If the Neighbourhood Plan Group would like to explore the potential of safeguarded land for a new school provided as part of a new housing scheme on East Norton Road, then we would be more than happy to meet the Group to discuss such options.</p>
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Appendix 1: Updated RAG Scoring Matrix

Criteria	Hallaton 19 – Extension site off East Norton Road			Hallaton 7 – Land at Cow Close		
	NDP Group Assessment Notes	RAG	Our RAG	NDP Group Assessment Notes	RAG	Our RAG
Site area and capacity	1HA – Approximately 20 units (3 bed houses).	Yellow	Yellow	0.6HA – Approximately 11 units (3 bed houses)	Red	Yellow
Current Use	The site comprises of a large field currently used for grazing, this farm use would need to be relocated.	Yellow	Yellow	The site comprises of a large grazing field, with underused farm buildings within the curtilage	Yellow	Yellow
Adjoining Uses	The site sits in very open Countryside and is surrounded on three sides by arable fields in current use, the fourth boundary is the recreation ground. The site is wholly outside of the current (and draft new) village envelope and it has a very rural, open countryside aspect with panoramic open vistas to three aspects.	Red	Yellow	Although the site adjoins the current village envelope it has a countryside aspect with open views to the Southern and Eastern elevations. Residential units are already found either side of the site	Yellow	Yellow
Topography	A sloping site with ground levels that will require minor mitigation	Yellow	Green	A sloping site with ground levels that will require mitigation	Yellow	Yellow
Ridge and Furrow	This site is a part of a non-designated heritage asset. Destruction of a known Historic England example such as this is one is in direct contravention of the Neighbourhood Plan environment policy 5 and is poor practise. Excellent ridge and furrow to a large section of the site, scores a 4.	Red	Yellow	Moderate quality ridge and furrow, development could be seen to compromise Neighbourhood Plan environment policy 5. A score of 3	Yellow	Yellow
Greenfield or PDL	A greenfield site	Red	Red	A greenfield site	Red	Red
Good Quality Agricultural Land	The whole site is classified as grade 3 agricultural land by Natural England, this is agricultural land of a good to moderate quality.	Yellow	Yellow	The whole site is classified as grade 3 agricultural land by Natural England, this is agricultural land of a good to moderate quality.	Yellow	Yellow

		Single ownership or multiple ownership	Multiple ownership, agreement to proceed.			Single ownership		
		Landscape & Visual Impact Assessment (LVIA)	The view from this location is stunning, several very long distance panoramic views are found and the location is of a very rural character and is of a very high LVIA quality. The site is within the High Leicestershire Landscape Character Area, the most sensitive location in Harborough District. The site is surrounded on all sides by mature planting, with open vistas to all three aspects. Development would cause substantial harm to the quality and the amenity of adjoining residents and undermine the "feel" of this side of the village.			The view from the top elevation of the field is good, location feels rural in character and is of reasonable LVIA quality. The site is within the High Leicestershire Landscape Character Area, the most sensitive location in Harborough District. The site is surrounded on three sides by trees and hedgerow, with two open aspects. Development would cause less than substantial harm to the quality and amenity of adjoining residents.		
		Important Trees, Woodlands & Hedgerows	Several large, mature trees are dotted around the boundaries, hedgerows bound the whole site to all four boundaries and individual mature trees are found within the site- all of these will features will need to be fully protected. Development would harm or require of hedgerow.			Mature trees are in place around the western boundary and the hedgerow that is in place will need to be fully mitigated within a sensitive design solution, site access will probably require a small section of hedgerow to be removed.		
		Relationship with existing pattern of built development	The site has a very prominent visibility and would extend the village envelope in a non-contiguous fashion which is generally unacceptable in planning terms.			The site is adjacent to a small number of existing residential properties, substantial planting is already in place to mitigate this loss of amenity.		
		Local Biodiversity considerations	Minor issues, a score of 2.			Mature woodland strip to West boundary and sections of hedgerows. A score of 2		
		Listed Building or important built assets	No harm identified to existing listed buildings or their respective settings.			No harm identified to existing listed buildings or their respective settings.		
		Impact on the Conservation	The whole site is outside of the Hallaton conservation area, however, development of this			The majority of the site is outside the Hallaton conservation area (2005).		

		Area or its setting	scale would cause less than substantial harm.			although the planting bund and three buildings are within the area development would mean less than substantial harm.		
		Safe pedestrian access to and from the site	An existing footpath is in place along East Norton Road, it would be fairly straightforward to add an additional footway in to the site and this would ensure good pedestrian connectivity with the village centre.			An access is in place along Horninghold Road and this will require improvement, further footway on the opposite side of Medbourne Road, straightforward to ensure pedestrian connectivity with the village centre.		
		Safe vehicular access to and from the site	Although no adequate vehicular provision is in situ it is reasonably straightforward to provide an access from East Norton Road, subject to the width and visibility splay being agreed with highways. One particular concern from HDC is the Highways view in the 2016 SHLAA report that only "one" site is currently achievable to the North of the village. Vehicular access may well be impossible due its sensitive location.			A small vehicular access exists on Horninghold Road, therefore it will be straightforward to provide vehicular access to the site, but the existing access will require significant improvement.		
		Impact on existing vehicular traffic	A medium scale impact on the village centre			A large impact from the increase in the number of units on the existing village centre		
		Distance to designated village centre, Stenning Hall	A walking distance of about 340m to the village centre community facilities.			A walking distance of about 360m to the village centre community facilities		
		Distance to Primary school	Hallaton CE Primary school is approximately 530m from the centre of the site.			Hallaton CE Primary school is about 675m from the centre of the site		
		Current existing informal/formal recreational opportunities on site	None identified on the site but the village recreation ground is in the next field, with tennis courts on the boundary.			None identified		
		Ancient monuments or archaeological remains	None found on the site.			Ancient monuments or archaeological remains		

		Any public rights of ways/bridle paths	None identified.			No informal footpaths or ROW are found within the site boundaries		
		Gas, oil, pipelines and networks & electricity transmission network	A telephone cable is found on the edge of the site and this will require re-siting.			A utilities cable is in place along Hominghold Road and this may require re-locating.		
		Any noise issues	No major noise issues identified, occasional noise from the adjacent highway, nearby public house or recreation ground.			No noise issues identified, minor traffic noise from Medbourne Road.		
		Any contamination issues	None identified			The site adjoins a contaminated land investigation area in the HDC SHLAA, a professional contamination survey is essential, and the cost of full remediation works may undermine economic viability		
		Any known flooding issues	The site is within flood zone 1 and does not appear to require a professional hydrology survey.			The site is within flood zone 1 and will not require a professional hydrology survey		
		Any drainage issues	Minor pooling on site, a large pond is found to the South of the site and several natural springs are in place along with a "filled in" brook, all require further investigation but can be readily mitigated.			No problems identified on site.		
		Score	8 Green 13 Amber 6 Red	13 Green 12 Amber 2 Red	2	11 Green 12 Amber 4 Red	10 Green 14 Amber 3 Red	11 I I
Harborough District Council		Please find below the Development Management Officers (East Team) observations/comments, we are concentrating on the Housing policies of the draft Neighbourhood Plan. Planning Officers from the Team have visited all the site and discussed the proposals within the Team.						
Development								

<p>Management The Symington Building Market Harborough</p>	<p>HBE3</p>	<p>Please find our comments on the whole document in the Regulation 14 responses.</p> <p>Policy HBE3 Housing Allocations: Map ref: 1 Rear of 31 High Street – amend the wording to ‘maximum 2 dwellings’ Around’ is a bit of a woolly statement, it need to be more precise so there is some certainty for developers and local people.</p> <p>The principle of residential development is acceptable, however, it is considered that due to the close proximity of adjacent dwellings that adequate separation distance will be an issue, therefore massing of the dwellings is an important planning consideration and a maximum of 2 dwellings is acceptable. Also given its location within the conservation area the design of the proposed dwellings is critical.</p> <p>Map ref: 2 Rear of 39-41 North End - amend the wording to ‘maximum 1 dwelling’ The principle of the development is acceptable however, due to the close proximity of the site to the listed building on High Street and impact upon residents amenity to residents on High Street. It is considered that only one dwelling on the site will be acceptable, that fronts the lane</p> <p>Please find attached (below) the officers report for the site ref: 19/01675/FUL by way of a detailed explanation</p> <p>Map ref: 3 Adjacent to the Fox Inn - should be omitted from the housing allocation policy. The site is not acceptable as a housing allocation site due to heritage impacts. The site creates a visible attractive green gateway into and out of the village which contributes to the setting of the Conservation Area and adjacent listed buildings.</p>
	<p>HBE3</p>	<p>Comments from the Conservation officers of the Council: Hallaton Neighbourhood plan Housing allocation site 3 Policy HBE3 The land in question, site 3, is historically undeveloped land which forms an attractive green and open space in a prominent location within the village. It makes a positive contribution to the character and appearance of the Hallaton Conservation area and the setting of the row of grade II listed buildings, 17-23 Northgate. The fact that such a prominent site is historically undeveloped is also of historic interest.</p> <p>The Conservation Area Character Statement identifies the positive contribution made by the greens and open spaces – North End is one of the areas named. The Statement also recognises that whilst there is no one focal point in the village there are three significant nodes – one of these is at North End.</p> <p>It is further felt that the allocation of the land for housing would be contrary to other provisions of the neighbourhood plan as follows:</p> <ul style="list-style-type: none"> • The Neighbourhood Plan describes Hallaton as having a heavily rural setting with myriad views of open countryside, open green spaces and a good variety and number of trees/planting. (p. 14). It notes that it is a very

green settlement, with a number of large trees of historical, arboricultural and ecological value and recognises the vital contribution trees make to the 'picturesque appearance of the village' which was identified through the Plan's consultation process as a key reason why Hallaton's residents enjoy living there. (p.45).

- The Plan also recognises Hallaton's 'rich and attractive built environment from its long history, resulting in a wide range of heritage assets, attractive landscapes and a distinctive character, as reflected by the quality of the Conservation Area'.(p.16).

To develop this land for housing would inevitably lead to a change of character and a loss of green space which it is considered would be harmful to the setting of adjacent designated heritage assets and would be contrary to the wider aims of the neighbourhood plan.

As such, for the reason set-out above, I do not consider that site 3 could be developed for housing without causing harm to the character of surrounding heritage assets and as such it is not suitable for housing and should be removed from the neighbourhood plan housing allocation.

Appendix 10 – Non-designated heritage assets

Some of the assets already have the protection afforded by national listing status

10. Hand Pump on High Street – this is nationally listed – 1061680

25. Water Conduit (High Street) – this is nationally listed – 1186770

27. Pump and Well adjacent to 8 Churchgate – this is nationally listed - 1061708

The site is within the limits of development of Hallaton, therefore it doesn't prevent a developer coming forward with an application for windfall residential development.

We hope you find the above information helpful in your assessment of the Hallaton neighbourhood Plan.

Officers report for the site ref: 19/01675/FUL

Application Number	19/01675/FUL
Site Address	Land Rear of 39, 41 and 43 North End, Hallaton
Proposal	Erection of two dwellings (resubmission of 18/01999/FUL) <ul style="list-style-type: none"> •Erection of two detached four bedroom dwellings with attached double garages to the front. • Existing stable block will be removed. • Access is proposed off North End via a private driveway that also serves 45

North End.



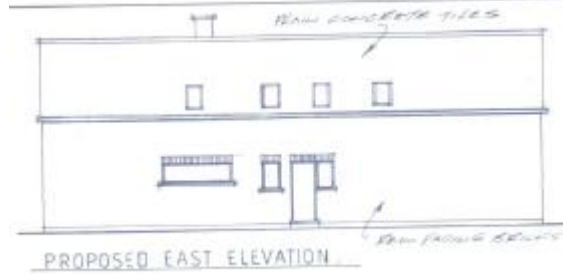
Proposed Site plan



Proposed west (side) elevation, view from the private drive.



Proposed north (front) elevation, view from North End and properties.



Proposed east (side) elevation.



Proposed south elevation (rear faces garden)


Differences between 18/01999/FUL:

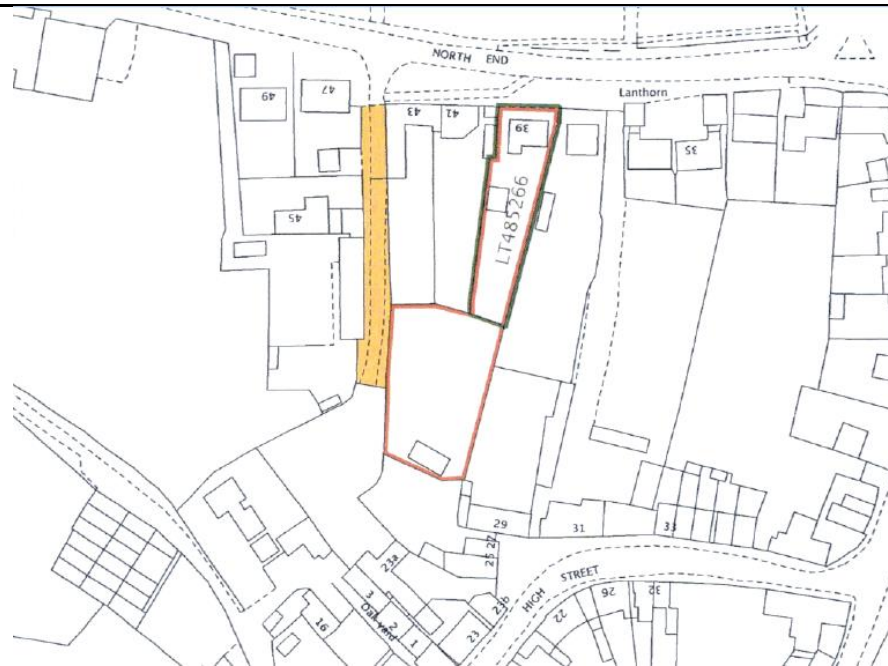
- The design, siting and massing of the dwellings is very similar to the previous submission.
- The only difference is that the dwellings have been reduced in depth, so they are further away from the southern (rear) boundary.

The applicant has submitted supporting information in the form of correspondence from Hallaton Parish Council dated August 2018 asking if the

			<p>applicant was willing to develop the land for four 2-3 bedroom properties.</p> <p>Since that date and in response to consultation on the Regulation 14 Hallaton Neighbourhood Plan Pre-Submission version 2nd Sept. 2019. The Planning Officers for the East side of the District submitted this to the Neighbourhood Plan group.</p> <p>Policy HBE3 Housing allocations/:- <i>'Site 2 the proposed 4 dwellings is unacceptable, 2 were proposed under ref: 18/01999/FUL, and that wasn't acceptable (please see details on the website). The principle of the development is acceptable however, due to the close proximity of the site to the listed building on High Street and impact upon residents amenity to residents on High Street. It is considered that only one dwelling on the site will be acceptable.'</i></p>	
		Publicity Expiry Dates	Weekly List	20.11.2019
			Neighbours	13.11.2019
			Consultations	13.11.2019
			Site Notice	14.11.2019
			Advert	21.11.2019
		Application Expiry Date	13.12.2019	
		Relevant Planning Policies/Guidance	Government Documents	NPPF (Feb. 2019) NPPG
			Harborough Local Plan	H1 Provision of Housing GD2 Settlement Development GD8 Good design of development HC1 Built heritage
			Supplementary Planning Documents	SPG 3 Development of small groups of dwellings including development within conservation area

			Other	<p>LCC Highway Authority Standing Advice (September 2011)</p> <p>Conservation Areas - Planning (Listed Buildings & Conservation Areas) Act 1990, Section 72(1).</p> <p>Listed Building Planning (Listed Buildings & Conservation Areas) Act 1990, Section 66(1).</p> <p>Hallaton Conservation Area Character Statement</p> <p>Hallaton Neighbourhood Plan (Hallaton Reg. 14 consultation in Sept./Oct. 2019) Status- limited weight</p>
		Relevant Planning History	<p>86/01584/30 Erection of two dwellings with garages Refused Appeal Dismissed</p> <p>Two grounds were: development of agricultural open land important to the village and impact upon the conservation area.</p> <p>18/01999/FUL Erection of two dwelling Withdrawn</p>	
		Consultation Responses	<p>Parish Council – no comments received.</p> <p>LCC Highway : no objection subject to conditions</p> <p>Land contamination Officer: No objection subject to risk based land contamination Assessment.</p> <p>HDC Conservation Officer: Objection</p> <p>LCC Ecology: no survey requirement</p>	

		<p>Neighbour Responses</p>	<p>15 (from 14 separate households) objections (1) paddock is green space in the centre of the village (2) area is too small for 2 dwellings (3) overlooking (4) unsympathetic in design and construction materials (5) bats (6) drainage and flooding issues due to levels differences (7) impact upon listed building.</p>	
		<p>Officer's Assessment</p>	<p>Site: The application site is off a private drive between No.43 and 45 North End, where the applicant has a right of access over.</p>  <p>From left to right-No.41, 43 private drive and 45 North End</p> <p>There is a stone wall and field gate to the site frontage. The site is mainly grassy paddock, with a stable block located along the southern boundary of the site.</p>	



The site is surrounded by residential dwellings and their respective rear gardens. There is post and rail fence to the northern boundary with the long rear garden to houses on North End. To the eastern boundary is a low brick wall to the rear gardens of No.39 North End and 29 High Street. Along the southern boundary is a high brick wall to 25/27 High Street.

The site is within the conservation area of Hallaton. No. 29 and 31 High Street are both Grade 2 Listed buildings.

As this application is for the erection of two dwellings within the conservation area and settlement boundary of Hallaton, Policies H1, GD2, GD8 and HC1 of the Harborough Local Plan are relevant in the consideration of the above proposal.

Principle of development.

			<p>The site is within the selected rural village of Hallaton. Under policy H1 Housing provision Hallaton where a minimum of 30 new homes will be provided within the plan period.</p> <p>The Hallaton Neighbourhood Plan draft policies are given very limited weight as it has not gone through Public examination. Due to the early stages of the Hallaton Neighbourhood Plan, Hallaton does not have approved defined limits to development. However, assessing the proposal on the ground and the built form of development of the village, it can be seen that the application site is enclosed by built development off North End and on Hogs Lane, therefore it seems to fit within this existing built form of development. Therefore it falls to be considered under Policy GD2 Settlement Development part 1.</p> <p>Policy GD2 on Settlement Development part 1 (a) explains that development will be permitted where it respects the form and character of the existing settlement and retains natural boundaries. Therefore the proposal is acceptable in principle, subject to other material planning consideration, which are assessed later in the report.</p> <p>The Council currently has a healthy 5 year housing land supply of 7.04 years (June 2019).</p> <p>The proposal would make a limited contribution to the market housing provision for the village and district as a whole, and there would also be very limited employment and social benefits during construction of the dwellings and use of local facilities by future residents.</p> <p>Impact upon the conservation area and setting of the listed buildings.</p> <p>Policy GD8 states that development will be permitted where it achieves a high standard of design, by ensuring development is inspired by, respects and enhances the local character and distinctiveness of the settlement, is sympathetic to local vernacular, and respects the context and characteristics of the individual site, street scene and wider local environment.</p> <p>HC1 Built Heritage states that development affecting heritage assets and their setting will be permitted where it protects, conserves and enhances the significance, character and setting of the asset. Development within or affecting a conservation area will be permitted where it preserves and enhances the</p>	
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			<p>character and appearance of the conservation area.</p> <p>SPG Note 3 states that <i>'new dwelling on small plots must be sympathetic to, and compliment the character of the built form in terms of layout design and materials.'</i></p> <p>The Hallaton Conservation Area character statement makes reference to the village having <i>'a network of irregular roads and lanes, some with open spaces between them.....the greens and opens spaces of Hallaton are of close sut grass, or are meadows and paddocks, gardens and allotments.'</i> The Character statement makes specific reference to the application site <i>' The meadow paddock areas include area behind houses and streets as between North End and The High Street. They indicate the evolution of the settlement pattern being garden/agricultural land for the use of dwellings lining the street of a rural village, rather than urban style compact development.'</i></p> <p>The application site and the wider area between North End and High Street is designated conservation area. It is not designated Open Space, sport and recreation site, and in the draft Neighbourhood Plan has no other designations. The application site is not prominent or conspicuous within the main thoroughfares in Hallaton, as the wider site is primarily surrounded by dwellings and their gardens. However, there are frequent glimpsed views into the site from all directions of mature trees and soft landscaping.</p> <p>The proposed dwellings are to be sited of a private driveway off North End. Hallaton, has a few small track off main roads with dwellings fronting onto the tracks, through the village i.e. Oak yard and Hog Lane, this is often characteristic of old villages. There are no mature trees within or immediately adjacent to the site, that would be affected by the proposal. Therefore it is considered that the principle of siting a house fronting the private driveway is acceptable, subject to the design, scale and massing of the dwelling.</p> <p>However, the proposed dwellings are sited one behind another, therefore only one dwelling appears to face the street. Also, the design of the dwellings means that it is not clear which is the front of the house, normally on this design of house the north elevation is the front but this elevation does not front the access, however, the front door is on the west side elevation. Traditional houses as seen in Hallaton have clearly defined frontages and front doors. The proposed layout and design of the proposed dwellings means they do not clearly present to the</p>	
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			<p>street scene (the private driveway) therefore having an adverse impact upon the character of the conservation area.</p> <p>The proposal provides no assessment of the historic layout and design of dwellings in Hallaton. The proposed houses make no reference to the historic dwellings nearby in the village, and as such it results in dwellings that are totally out of keeping and incongruous with the historic form, layout and design of traditional dwellings in the village.</p> <p>The dwelling forms a large linear block some 17.5metres deep in the centre of the conservation area, with an unattractive attached front garage visible from the private drive. The proposed dwellings have modern proportions in terms of its long depth, roof and window design and as such results in dwelling that are poor quality in appearance and of little architectural merit. Therefore the proposal harms the character and appearance of the conservation area.</p> <p>The proposal lacks space around the dwellings that is a key planning consideration for development in conservation area, there are only 1-1.5metre gaps between the proposed dwellings and at the boundaries. Also the substantial depth of the dwellings at 16.5metres means there is considerable massing very close to the boundaries.</p> <p>The site is visible from Hog Lane to the west of the application site and is viewed through the frequent gaps between houses on High Street and North End. At present there is a green and verdant view of the central area behind houses in High Street and North End. However, with two unsympathetic and excessively large (long) dwellings sited on the application site, they would become immediately visible and appear totally out of place in the centre of Conservation village. As such the proposal would harm the character and appearance of the conservation area.</p>	
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29 and 31 High Street (listed buildings)

No.29 is closest to the application site, it is on significantly lower level than the application site and is positioned only a few metres from the south-east corner of the application site. The proposed massing at 17.5m deep at 6.6metres high, and siting close to and along half the eastern boundary of the site adversely affects the setting of the listed buildings

The Conservation Officer explained that the site appears to be *'historically undeveloped and has a stone wall running along the boundary with the access drive.'*

The Officer is critical that *'no historical assessment has been submitted as part of the scheme which sets out how the proposal has been considered with respect of the surrounding heritage assets, furthermore, it is difficult to assess the scheme without details of levels or a street scene or any form of landscaping plan showing how vehicular access could be achieved.'*

The Officer states that the *'proposed houses do not reflect the traditional form of housing found in this part of the village, nor to they reflect a historic layout. While accessed from a private drive, there is an element of public access and the site is distantly visible from north end as well as from surrounding properties.'*

The Conservation Officer as such has concerns that *'this proposal would look out of place with the surrounding properties and the wider conservation area and as such would have a harmful impact on the character and appearance of the*

			<p><i>conservation area and the setting of adjacent listed buildings.'</i></p> <p>The proposal therefore adversely affects the character and appearance of the conservation area and the setting of the adjacent listed buildings. The application is therefore considered to be contrary to Policies GD8 and HC1 of the Harborough Local Plan.</p> <p>Impact on Neighbours: Policies GD8 states that development will be permitted where it is designed to minimise impact on the amenity of existing and future residents.</p> <p>The proposed design of the dwellings, results in some amenity issues for future residents of the proposed properties. The kitchen window to the western plot will view the two storey blank wall of the eastern plot, however whilst this is not ideal, as it would be adversely overbearing. The kitchen is open plan to the dining area which has a large patio door to the south elevation, which due to its orientation will not result in a loss of light. Also there is a secondary side bedroom window which would result in overlooking of the adjacent plot, however, the window could be conditioned to be obscure glazed and fixed shut.</p> <p>The properties along North End are some distance away 40metres therefore there is no adverse impact upon the residents amenity.</p> <p>45 North End the dwelling along the private driveway is some distance from the proposal across the road and further north, the private amenity space is also behind the buildings adjacent to the driveway, therefore the residents are not adversely affected by the proposal.</p> <p>The dwellings on High Street primarily 25/27 High Street (one dwelling) and 29 High Street a brick and thatched roof listed dwelling are affected by the proposal. The reduction in the size of the proposal results in the eastern plots rear elevation being 23metres to the southern boundary and 27metres to the rear elevation of 29 High Street. Whilst the dwelling is on lower ground than the application site, the proposal is not adversely overbearing or overshadowing due to the separation distance being in excess of 21m SPG guidance, the limited height of the proposed dwellings (6.8metres) and position to the north of the dwellings on High Street.</p> <p>The side roof lights to the proposed dwellings serve bathrooms (condition to be</p>	
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			<p>obscure glazed) and one bedroom. The rooflight appears to have a ground floor to cill height of 1.5metres which is a bit low, this detail can be conditioned on any approval. The rooflights are close to the rear garden boundary of No.29 High Street, however, the position is at the top end of the long gardens to No.29 High Street and 37 North End, therefore loss of privacy is limited to existing residents.</p> <p>The separation distance from the rear of the western plot to the rear elevation of No.25/27 High Street is over 35metres, there is also a high brick wall along the southern boundary which provides a good level of privacy to existing residents. Therefore the proposal is not considered to be adversely overbearing or overshadowing to the residents on High Street.</p> <p>The proposal therefore does not adversely affect neighbours amenity. The application is therefore considered to be in accordance with Policy GD8 of the Harborough Local Plan.</p> <p>Highways: The parking and turning provision for the proposal is acceptable and the Highway Officer has no objection to the scheme, subject to a parking and turning condition. Therefore there are no highways safety issues. The application is therefore considered to be in accordance with Policy GD8 of the Harborough Local Plan.</p> <p>Planning balance <i>The limited public benefit of two market houses does not out-weigh the less than substantial harm the proposal causes to the Hallaton Conservation area and setting of the listed buildings.</i></p>	
		<p>Conclusion</p>	<p>The revised proposals will adversely affect the character and appearance of the conservation area. However, the proposal will not adversely affect the amenities of occupiers of neighbouring properties, or the safe and efficient use of the adjoining highway.</p> <p>Whilst the harm would be less than substantial, the public benefits would not be sufficient to outweigh the harm the development would cause. The proposal therefore conflicts with Section 16 of the NPPF, and Policies HC1 and GD8 of the Harborough Local Plan.</p> <p>It is therefore recommended that the application be Refused.</p>	

Note to applicant-It is considered that either one small dwelling maybe acceptable on the site in the future. It is requested that the applicant engage in pre-application discussions with the Council.


Photographs/Street view (Google)



View from the private driveway



View of the application site and northern boundary

			 <p data-bbox="983 922 1411 954">View south of the application site</p>	
<p data-bbox="185 994 439 1169">Harborough District Council Planning Policy The Symington Building Market Harborough</p>	<p data-bbox="465 994 539 1018">HBE1</p> <p data-bbox="465 1209 539 1233">HBE2</p> <p data-bbox="465 1297 568 1321">Page 20</p>	<ul style="list-style-type: none"> <li data-bbox="701 994 2063 1169"> <p>• Policy HBE1 Design standards:</p> <ul style="list-style-type: none"> <li data-bbox="790 1026 2033 1074">o Design principle 1- requiring new development to 'enhance' local distinctiveness and character be seen as going beyond national/local policy requirements. Suggest use of respect as an alternative. <li data-bbox="790 1090 1563 1114">o Inconsistent use of 'will' and 'should' in Design Principles. <li data-bbox="790 1121 2063 1169">o Would Design Principles be better placed within supporting text and referred to in the policy in same way as the Village Design Guide is? <li data-bbox="701 1209 2063 1265"> <p>• Policy HBE2 Limits to Development: may be clearer to refer to 'Local Plan' policies rather than Development Plan.</p> <li data-bbox="701 1297 2092 1383"> <p>• Page 20 (last para, last 2 sentences): Rather confused. Suggest simplifying and replacing with: A Statement of Common Ground is currently being prepared by Leicester and Leicestershire Housing Market Area local authorities. This will set out how Leicester City's unmet need will be accommodated across the District authorities.</p> 		

	Page 21	<ul style="list-style-type: none"> Page 21 (Second paragraph, last sentence): This does not reflect what the adopted LP says at para 5.1.11. Of this, 8,150 8,792 dwellings have already been built or committed (through the granting of planning permission or through allocation in Neighbourhood Plans) leaving a residual requirement of 4,650 3,975 dwellings up to 2031 (taking into account a windfall allowance).
	HBE4	<ul style="list-style-type: none"> Policy HBE4 Reserve site allocation: Criterion b) – use of ‘to be focused around 2-bed bungalows’ is vague. Does it mean predominantly 2-bed bungalows? Will it not depend on need at the time?
	ENV1	<ul style="list-style-type: none"> Policy ENV1 Local Green Spaces: Would benefit from individual site maps which show boundaries more clearly within NP.
	ENV3	<ul style="list-style-type: none"> Policy ENV3 Important open spaces: L should have HDC OSSR after its description.
	ENV4	<ul style="list-style-type: none"> Policy ENV4 Built environment: Local heritage assets: Refers to ‘details Appendix 10’ but Appendix 10 on the Parish Council’s website only lists and details 5 of the local heritage assets (and the numbering doesn’t tally for those 5). As it is referenced in the policy the complete appendix for all the LHAs should be available. It would be helpful if the appendix included a more detailed map of each.
	ENV6	<ul style="list-style-type: none"> Policy ENV6 Notable tree: 44 and 45 are on the map but not listed in Appendix 11.
	ENV7	<ul style="list-style-type: none"> Policy ENV7 Local landscape character area: Suggest requiring the enhancement of the landscape is too high an aspiration. Development proposals that affect the Local Landscape Character Area should rather respect and, where possible, enhance the landscape.
	ENV9	<ul style="list-style-type: none"> Important views: No reference to Appendix 9 included.
	CFA2	<ul style="list-style-type: none"> Policy CFA2 new or improved community facilities: Not clear as drafted if all criteria are expected to be met (i.e. no ‘and’ included).
	CFA3	<ul style="list-style-type: none"> Policy CFA3 New school: may be more accurate to re-name policy ‘Hallaton Primary School’ as it does not propose a new school.
	TR2	<ul style="list-style-type: none"> Policy TR2 Electric vehicles: May be better not be too specific as regards cabling as requirements may change over time.
	BE1	<ul style="list-style-type: none"> Policy BE1 Support for existing businesses and employment opportunities: Suggest deletion of ‘strong’ in first sentence.

	BE2	<ul style="list-style-type: none"> Policy BE2 Support for new business and employment: Criterion a) 'Exceptional circumstances' is unexplained and introduces ambiguity. Again are proposals expected to meet all criteria? Not clear.
	BE4	<ul style="list-style-type: none"> Policy BE4 Farm diversification: Would read better if 'subject to' was replaced by 'where'.
Highways England The Cube 199 Wharfside Birmingham B1 1RN		<p>Consultation on the Submission Version of the Hallaton Neighbourhood Plan</p> <p>Highways England welcomes the opportunity to comment on the Submission version of the Hallaton Neighbourhood Plan which covers the period 2018 - 2031. We note that the document provides a vision for the future of the area and sets out several key objectives and planning policies which will be used to help determine planning applications. 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 Hallaton Neighbourhood Plan, Highways England's principal interest is safeguarding the A14, with its nearest access point being A14 J3, approximately 20km to the South of the Plan area.</p> <p>We understand that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies. Accordingly, the Neighbourhood Plan for Hallaton is required to be in conformity with the adopted Harborough Local Plan (2011 - 2031) and this is acknowledged within the document.</p> <p>Hallaton is identified in the emerging Harborough Local Plan as a Selected Rural Village suitable for growth, where a minimum of 30 dwellings will be provided to 2031. It is noted that subsequent planning approvals in the Parish have reduced this minimum requirement to five. However, the Neighbourhood Plan incorporates residential allocations (for a total amount of 8 dwellings) that exceed this minimum figure and identifies a reserve site for additional 11 units outside of the limits to development. This is meant to come forward in the event that either housing need increases during the Plan period or there is a failure to deliver sites which are either allocated or have planning approval.</p> <p>Regarding employment opportunities in the area, we note that planning proposals for employment uses will only be supported where the use is appropriate for the location and would not result in negative impact on the capacity of the existing highway network.</p> <p>Considering the limited level of growth planned in Hallaton, we do not expect there would be any material traffic impacts on the SRN. We therefore have no further comments to provide and trust the above is useful in the progression of the Hallaton Neighbourhood Plan.</p>
LCC Policy, Economy & Community, Chief Executive's	HBE1	<p>Highways Specific Comments</p> <p>Page 17: POLICY HBE 1: DESIGN STANDARDS, POINT 6 (T&S)</p> <p>This may not be possible in all scenarios, as street lighting is often linked to the speed limit of the road. A road with a</p>

<p>Department, Leicestershire County Council, County Hall, Glenfield, Leicestershire LE3 8RA</p>	<p>HBE8</p> <p>Page 54</p> <p>CFA2</p> <p>CFA3</p> <p>Page 60 to 61</p>	<p>restricted road status (30mph by a system of street lighting) is often synonymous with the urban environment. A system of street lighting is legally defined as 3 lamp columns within 183 metres; which is greater than the Parish policy. Any new developments may also require street lighting, and this would link to any existing street lighting outside of the 50 metres.</p> <p>Page 27: POLICY HBE 8: WINDFALL SITES, POINT E (HDM, T&S) In accordance with the NPPF, development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe. Any mitigation must be demonstrated to be necessary, directly related, reasonable and proportionate to the development proposal in question. The nature of the planning process is such that a development need only mitigate its own impact. This would be assessed and commented on by any planning application that affects the highway.</p> <p>Page 54: 9 – COMMUNITY FACILITIES AND AMENITIES (T&S) Leicestershire County Council is not responsible for the creation of off-street parking and could only control parking by on-street parking restrictions. There are currently no parking restrictions in Hallaton and these are very unlikely to be supported by locals. The introduction of parking controls would not meet LCC’s criteria and therefore this would only be possible if funded by the parish.</p> <p>Page 58: POLICY CFA2: NEW OR IMPROVED COMMUNITY FACILITIES This would be assessed and commented on by any planning application that affects the highway with any mitigation identified</p> <p>Page 59: POLICY CFA3: NEW SCHOOL (T&S) This would be assessed and commented on by any planning application that affects the highway with any mitigation identified.</p> <p>Pages 60-61: SECTION 10 TRAFFIC MANAGEMENT (T&S) Only if this data supports the need to slow vehicles down would LCC support the use of traffic calming. The parish must be fully aware of the costs (~£15K per traffic calming measure) and that they are installed via the correct legislation. A third party funded scheme supported by LCC would have to establish if there is an actual speeding problem through speed survey data. The management of speed would have to be assessed to ensure the correct limit is in place for the location. This assessment alongside liaison with Leicestershire Police would ensure that limit set would also have a high driver compliance level. The assessment would take into account the current driver compliance with the current speed limit, the class of road, the type of road, the physical environment (including direct frontages), the interaction between all road users and the accident record.</p> <p>The strategic road network in the County includes all A and B class roads and this is where we would expect to see the majority of the vehicles (including HGVs); however, there are currently no weight restricted roads in Hallaton parish and</p>
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	<p>TR3</p> <p>Page 64</p> <p>Pages 60 to 61</p>	<p>therefore any vehicle including HGV's can legitimately use these roads. Leicestershire County Council is not responsible for the creation of off-street parking and could only control parking by on-street parking restrictions. There are currently no parking restrictions in Hallaton and these are very unlikely to be supported by locals. The introduction of parking controls would not meet LCC's criteria and therefore this would only be possible if funded by the parish.</p> <p>POLICY TR3: FOOTPATHS (S&S, T&S) LCC would fully support TR3: a) & b). The existing footpath network would be maintained according to LCC standards and practices. A more extensive footpath would need to be fully funded by the Parish (including future maintenance), where it does not meet LCC criteria.</p> <p>Page 64: SECTION 11 BUSINESSES AND EMPLOYMENT (T&S, S&S) No comment from a Traffic & Signals view</p> <p>Pages 60-61: SECTION 10 TRAFFIC MANAGEMENT (T&S) Parking provision should be in accordance with Leicestershire Highway Design Guide standards, where applicable.</p> <p>General Comments The County Council recognises that residents may have concerns about traffic conditions in their local area, which they feel may be exacerbated by increased traffic due to population, economic and development growth. 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 provided as a commuted sum. Regarding 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 ie 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</p>
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	<p>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>Flood Risk Management</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"> • Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation. • Use existing flood risk to adjacent land to prevent development. • Require development to resolve existing flood risk. <p>When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points:</p> <ul style="list-style-type: none"> • Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)). • Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map). • Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding. • How potential SuDS features may be incorporated into the development to enhance the local amenity, water quality and biodiversity of the site as well as manage surface water runoff. • Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk. <p>All development will be required to restrict the discharge and retain surface water on site in line with current government policies. This should be undertaken through the use of Sustainable Drainage Systems (SuDS). Appropriate space allocation for SuDS features should be included within development sites when considering the housing density to ensure that the potential site will not limit the ability for good SuDS design to be carried out. Consideration should also be given to blue green corridors and how they could be used to improve the bio-diversity and amenity of new developments, including benefits to surrounding areas. Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing</p>
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	<p>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. 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. Flood risk mapping is readily available for public use at the links below. The LLFA also holds information relating to historic flooding within Leicestershire that can be used to inform development proposals. Risk of flooding from surface water map: https://flood-warning-information.service.gov.uk/long-term-flood-risk/map Flood map for planning (rivers and sea): https://flood-map-for-planning.service.gov.uk/</p> <p>Planning Developer Contributions</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 Adopted North Kilworth NP and the Adopted 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. North Kilworth Adopted Plan Great Glen Adopted Plan</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. You should also be aware of Minerals and Waste Safeguarding Areas, contained within the adopted Minerals and Waste Local Plan. These safeguarding areas are there to ensure that non-waste and non-minerals development takes place in a way that does not negatively affect minerals 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>Property Education</p> <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>
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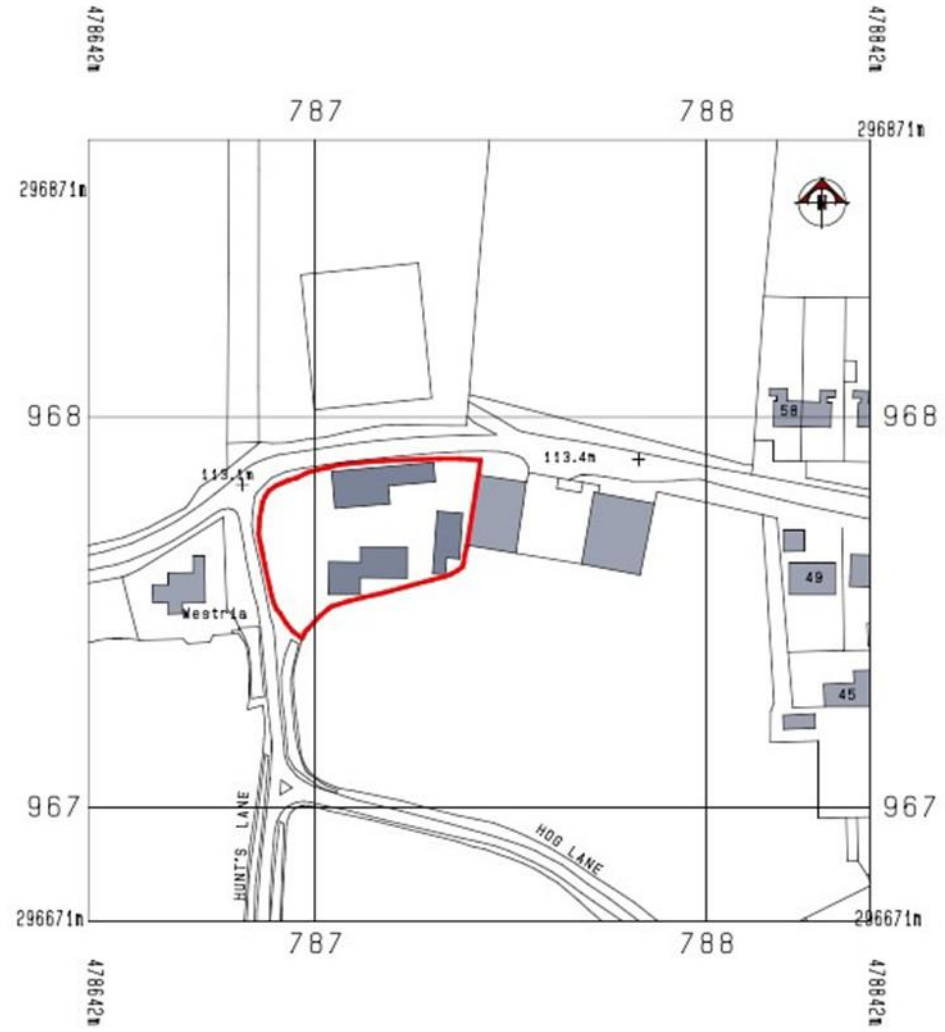
	HBE1	<p>It is recognised that it may not always be possible or appropriate to extend a local school to meet the needs of a development, or the size of a development would yield a new school. However, in the changing educational landscape, the Council retains a statutory duty to ensure that sufficient places are available in good schools within its area, for every child of school age whose parents wish them to have one.</p> <p>Strategic Property Services</p> <p>No comment at this time.</p> <p>Adult Social Care</p> <p>It is suggested that reference is made to recognising a significant growth in the older population and that development seeks to include bungalows etc of differing tenures to accommodate the increase. This would be in line with the draft Adult Social Care Accommodation Strategy for older people which promotes that people should plan ahead for their later life, including considering downsizing, but recognising that people's choices are often limited by the lack of suitable local options.</p> <p>Environment</p> <p>Specific Comments Page 11: The vision statement does not allude to the environment and its protection. Pages 17 & 18. Policy HBE1: Design Standards, point 9 could be expanded to state 'refuse and recycling collection system.'</p> <p>General Comments In 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>Climate Change</p> <p>The County Council through its Environment Strategy is committed to reducing greenhouse gas emissions in Leicestershire and increasing Leicestershire's resilience to the existing and predicted changes in climate. Furthermore, LCC has declared a climate emergency along with most other UK councils. The County Council has committed to becoming carbon neutral as a council by 2030 and to working with others to keep global temperature rise to less than 1.5 degrees Celsius, which will mean in effect needing to achieve carbon neutrality for Leicestershire by 2050 or before. Planning is one of the key levers for enabling these commitments to be met and to meeting the legally binding target set by the government for the UK to be carbon neutral by 2050. Neighbourhood Plans should in as far as possible seek to contribute to and support a reduction in greenhouse gas emissions and to increasing the county's resilience to climate change.</p>
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	<p>Landscape</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; Leicester, Leicestershire and Rutland Landscape and Woodland Strategy; the Local District/Borough Council landscape character assessments and the Landscape Sensitivity and Green Infrastructure Study for Leicester and Leicestershire (2017) which examines the sensitivity of the landscape, exploring the extent to which different areas can accommodate development without impacting on their key landscape qualities. 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>LCC would encourage the development of local listings as per the National Planning Policy Framework (NPPF) and LCC have some data on the social, cultural, archaeological and historic value of local features and buildings (https://www.leicestershire.gov.uk/leisure-and-community/history-and-heritage/historic-environment-record)</p> <p>Biodiversity</p> <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 clearly outlines the importance of sustainable development alongside the core principle that planning should contribute to conserving and enhancing the natural environment, providing net gain for biodiversity, 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 or management of open spaces on enhancing biodiversity and habitat connectivity, such as hedgerows and greenways. Also, habitat permeability for habitats and species which addresses encouragement of movement from one location to another such as the design of street lighting, roads, noise, obstructions in water, exposure of species to predation and arrangement of land-uses.</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: planningecology@leics.gov.uk, or phone 0116 305 4108</p> <p>Green Infrastructure</p> <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</p>
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	<p>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. 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. 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>Brownfield, Soils and Agricultural Land</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 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>Strategic Environmental Assessments (SEAs)</p> <p>Information for Neighbourhood Planning groups regarding Strategic Environmental Assessments (SEAs) can be found on the Neighbourhood Planning website (www.neighbourhoodplanning.org) and should be referred to. As taken from the website, a Neighbourhood Plan must meet certain basic conditions in order to be ‘made’. It must not breach and be otherwise compatible with EU obligations. One of these obligations is Directive 2001/42/EC ‘on the assessment of the</p>
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	<p>effects of certain plans and programmes on the environment' (Environmental Assessment of Plans and Programmes Regulations, 2004, available online). This is often referred to as the SEA Directive. Not every Neighbourhood Plan needs a SEA, however, it is compulsory to provide when submitting a plan proposal to the local planning authority either:</p> <ul style="list-style-type: none"> • A statement of reasons as to why SEA was not required • An environmental report (a key output of the SEA process). <p>As the UK prepares to leave the EU in 2020, Neighbourhood Planning groups should remain mindful of any future changes which may occur to the above guidance.</p> <p>Impact of Development on Civic Amenity Infrastructure</p> <p>Neighbourhood planning groups should remain mindful of the interaction between new development applications in a district area and 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 HWRC 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 relevant Legislation Regulations.</p> <p>Communities</p> <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 with your community. 2. Set out policies that seek to; <ul style="list-style-type: none"> • protect and retain these existing facilities, • support the independent development of new facilities, and, • 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. <p>You are encouraged to consider and respond to all aspects of community resources as part of the Neighbourhood Planning process. Further information, guidance and examples of policies and supporting information is available at www.leicestershirecommunities.org.uk/np/useful-information.</p> <p>Economic Development</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>
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		<p>Superfast Broadband</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 ultrafast broadband (of at least 100Mbps). Developers should take active steps to incorporate adequate broadband provision at the pre-planning phase and should engage with telecoms providers to ensure ultrafast broadband is available as soon as build on the development is complete. Where practical, developers should consider engaging several telecoms providers to encourage competition and consumer choice.</p> <p>Equalities</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>
<p>Trigpoint Conservation and Planning Ltd 6 Guildford Way Loughborough</p> <p>On behalf of xx</p>		<p>Objections to Policy HBE2 and Policy HBE3 In respect of Land at North End/Hunts Lane, Hallaton For Mr & Mrs xx</p> <p>1.0 INTRODUCTION</p> <p>1.1 This representation is made by Trigpoint Planning & Conservation Ltd on behalf of Mr & Mrs xx who own the land at the junction of North End and Hunts Lane (see Figure 1 site location plan below).</p> <p>1.2 We are writing to raise OBJECTIONS to the provisions of the proposed Hallaton Neighbourhood Plan in respect of:</p> <p>(i) the proposed limits to development (Policy HBE2), and</p> <p>(ii) the failure of the Neighbourhood Plan to allocate this site for a small-scale housing development (Policy HBE3).</p>



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Figure 1: Site at North End/Hunts Lane, Hallaton

		<p>2.0 RELATIONSHIP WITH THE DEVELOPMENT PLAN</p> <p>2.1 An important consideration in our objections is the relationship of the Neighbourhood Plan to the Development Plan - Footnote 16 of the National Planning Policy Framework (NPPF) states that '<i>neighbourhood plans must be in general conformity with the strategic policies contained in any development plan that covers their area</i>'.</p> <p>2.2 In this case the Development Plan for the area consists of the Harborough Local Plan 2011 – 2031 (adopted April 2019), and paragraph 1.6.7 of the supporting text re- iterates the point that with the exception of the policies outlined in paragraph 1.6.6, neighbourhood plans should be in general conformity with all policies of this Local Plan (<i>my emphasis</i>).</p> <p>2.3 Furthermore, paragraph 1.6.4 recognises that neighbourhood plans have an important role in bringing forward local housing sites as described in Policies SS1 <i>The Spatial Strategy</i> and Policy H1 <i>Provision of New Housing</i>. Policy SS1 adopts a sequential approach to the location of new housing development and it accepts that Selected Rural Villages, such as Hallaton, are sustainable locations capable of supporting limited growth to help sustain these villages, and Policy H1 proposes the provision of a minimum of 30 dwellings within Hallaton in order to meet the District's housing requirements.</p>
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		<p>2.4 The location of new development is also controlled by Policy GD2 <i>Settlement Development</i>, and it is one of the Local Plan policies that the Neighbourhood Plan is expected to comply with. The provisions of Policy GD2 are intended to be applied to all applications for new development within and on the edge of settlements and this criterion based policy replaces the limits to development that were previously referred to in the Harborough Core Strategy and the 2001 Local Plan. This policy makes clear that <i>'in addition to sites allocated in this Local Plan and neighbourhood plans, development adjoining the existing or committed built up area of ... Selected Rural Villages will be permitted'</i>, provided that the development:</p> <ul style="list-style-type: none"> • does not disproportionately exceed the settlement's minimum housing requirement in Policy H1; • is of a scale which reflects the size of the settlement concerned and the level of service provision within that settlement; • is physically and visually connected to and respects the form and character of the existing settlement and landscape; • comprises of the development of previously developed land of low environmental value, and enhances its immediate setting. <p>2.5 The Development Plan is therefore very clear in its policy objectives that:</p> <ul style="list-style-type: none"> • limits to development have been replaced by a criteria-based policy approach consistent with the NPPF, and • development on the edge of an existing settlement is acceptable within the
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	HBE2	<p>terms of the policy.</p> <p>2.6 Therefore, to be in general conformity with the Development Plan it is expected that the Neighbourhood Plan will reflect these policy objectives.</p> <p>3.0 OBJECTION TO NEIGHBOURHOOD PLAN POLICY HBE2: LIMITS TO DEVELOPMENT</p> <p>3.1 Our clients wish to raise two objections to Policy HBE2:</p> <p>(i) that the designation of limits to development (LTD) does not conform to the provisions of the Development Plan; and</p> <p>(ii) that if it is appropriate to designate LTD, then the site off North End should be included within those limits based on the methodology set out in the Neighbourhood Plan.</p> <p><i>The designation of limits to development</i></p> <p>3.2 According to its supporting text Policy HBE2 seeks to <i>'to designate an LTD for the village which will update and supersede the existing settlement boundary currently used by HDC'</i>, although the supporting text also recognises that <i>'Harborough Local Plan removes the LTD in favour of criteria-based policies'</i>.</p> <p>3.3 It is our view therefore that the introduction of LTD around Hallaton is not in accordance with the Development Plan, as these have been removed from the Local Plan, as the NP accepts. Consequently, the Neighbourhood Plan is out of step with the Development Plan and it is in effect proposing to</p>
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		<p>introduce a more restrictive approach to new housing development than that expressed in the Development Plan, which seeks to promote appropriate new housing development in sustainable locations.</p> <p>3.4 It is also the case that the application of Policy HBE2 could give rise to conflicts with Local Plan Policy GD2, whereby a proposed development could fall outside of the LTD contrary to Policy HBE2, but fully accord with the provisions of Policy GD2 which supports new build development within and on the edge of settlements.</p> <p>3.5 Therefore, in view of these potential policy conflicts, the Neighbourhood Plan cannot be said to be in general conformity with the Development Plan and therefore Policy HBE2, and the introduction of LTD, should be deleted from the Neighbourhood Plan.</p> <p><i>Inclusion of the North End Site Within the LTD</i></p> <p>3.6 If the designation of LTD is found to be appropriate and in accordance with the Local Plan, then the applicant objects to the exclusion of this site from the proposed LTD, when it is able to meet the criteria for the LTD as set out in the Neighbourhood Plan:</p>
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			Neighbourhood Plan Methodology	Response
			(a) The development sites with an extant planning permission for residential development on the fringes of the settlement have been incorporated within the boundary of the LTD;	This site lies on the edge of the built-up settlement and whilst it does not have an extant permission for residential development <i>per se</i> , it does have an extant planning permission for holiday lodges (see application ref. 17/00827/FUL). The local planning authority has therefore accepted that this site is suitable for development without harming the character of the area, and this should be recognised in the drafting of the proposed LTD.
			(b) Defined physical features such as walls, fences, hedgerows, woodland, gardens, streams, brooks, formal leisure uses, roads and significant changes in levels have been used as the defined boundaries;	The site is a relatively flat site with well-defined boundaries, with frontages to two roads. Therefore, rather than cutting around this site, the LTD should continue from the adjoining site along the rear of this site to Hunts Lane, which would then form a strong physical boundary between the built-up settlement and the more open countryside to the west of the village.
			(c) Non-residential land, which is countryside, agricultural, paddock, meadow, woodland and/or another green-field use has been excluded;	Whilst this the site is not residential land <i>per se</i> , neither can it be regarded as countryside, agricultural or a green-field site, particularly as it is occupied by a number of redundant buildings and has a planning permission for holiday lodges.

	HBE2		<p>(d) Isolated development which is physically or visually detached from the settlement has been excluded;</p> <p>(e) Sections of large curtilages of buildings which relate more to the character of the countryside than the built form has been excluded;</p> <p>(f) The curtilages of buildings which closely relate to the character of the built form and have enclosing features have been included.</p>	<p>This site is not physically or visually detached from the settlement, particularly as a new housing development is to be built immediately to the east and north (on the opposite side of the road) to this site (see application ref. 18/01266/FUL). It is therefore well contained within the built-up envelope of the village.</p> <p>The site is not within the curtilage of any other building.</p>	
			<p>3.0 It is our contention therefore that if the LTD were to be drawn in a manner that reflects these criteria, they would be drawn along North End to include this site and consequently we object to the exclusion of this site from the LTD.</p>		
			<p><i>Objection to Neighbourhood Plan Policy HBE2 - Summary</i></p>		
			<p>3.1 For the reasons set out above our clients wish to object to Policy HBE2 on the following grounds:</p> <p>(i) that the designation of LTD in the Neighbourhood Plan does not conform with the provisions of the Development Plan; and</p>		

	HBE3	<p>(ii) that if is appropriate to designate LTD, then this site off North End should be included within those limits based on the methodology set out in the Neighbourhood Plan.</p> <p>4.0 OBJECTION TO NEIGHBOURHOOD PLAN POLICY HBE3: HOUSING ALLOCATIONS</p> <p>4.1 Our clients object to the exclusion of this site from the housing allocations set out in Policy HBE3 of the Neighbourhood Plan.</p> <p><i>Background</i></p> <p>4.2 The site is a small parcel of land that has road frontages to North End and Hunts Lane, and it is presently occupied by a range of redundant buildings and can therefore be considered as brownfield land. The site has also been given planning permission for the erection of three holiday lodges served by an access to North End (see application ref. 17/00827/FUL).</p> <p>4.3 The local planning authority has also given planning permission for a new housing development of 23 houses on the land fronting North End immediately to the east of this site and on the field directly opposite, on the north side of North End (see application ref. 18/01266/FUL). In approving this application, the local planning authority considered that as the proposed site adjoined the existing built up area it complied with Local Plan Policy GD2.</p>
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		<p>4.4 Both sites are within the Hallaton Conservation Area, and the Conservation Officer did not object to either of these proposals.</p> <p><i>Allocation of Sites for Housing in the Neighbourhood Plan</i></p> <p>4.5 Having assessed a number of potential housing sites, Neighbourhood Plan Policy HBE3 has identified three sites for residential development plus a reserve site based on various criteria. The site at the junction of North End/Hunts Lane (Site Reference Hallaton 15) has not been included within the Neighbourhood Plan and it is our view that the methodology used to assess this site is now out of date and/or flawed, and that an up-to-date assessment of this site would significantly improve its RAG (red – amber – green) rating.</p> <p>4.6 The published assessment for this site gave this site either a ‘red’ rating or an ‘amber’ within a number of criteria, it is our view that these should be reviewed:</p>
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			Criteria	Neighbourhood Plan Assessment	Review of the Assessment
			Adjoining Land Uses	The site is in a Countryside setting and adjoins a large farm building on one side and a cottage on the other. The site is wholly outside of the current village envelope and it has a very rural, tranquil feel.	<p>As noted above the site has an extant permission for three holiday lodges and will adjoin housing to the east, forming an almost continuous built-up frontage to North End, and face onto housing on the north side of North End.</p> <p>The site is an established part of the built up village envelope, and can no longer be reasonably regarded as countryside or outside of the village envelope.</p> <p>Recommendation: Change 'Red' rating to 'Green'</p>
			Good Quality Agricultural Land	The whole site is classified as grade 3 agricultural land by Natural England, this is agricultural land of a good to moderate quality.	<p>This site is not in agricultural use and the Neighbourhood Plan assessment actually accepts that this is a brownfield site.</p> <p>Recommendation: Change 'Amber' rating to 'Green'</p>

			<p>Landscape & Visual Impact Assessment</p>	<p>The view from the top of the field is good, location feels rural in character and is of a medium LVIA quality. The site is within the High Leicestershire Landscape Character Area, the most sensitive location in Harborough District. The site is surrounded on two sides by trees. Development would cause substantial harm to the quality and the amenity of adjoining residents and the Countryside setting.</p>	<p>For the reasons set out above the site and surrounding area can no longer be considered as rural in character, and a new housing development on this site would not harm the quality of the local landscape. There were also no landscape objections to the neighbouring development.</p> <p>Furthermore, questions of residential amenity should be left to a proper assessment of any development proposals in light of the policies in the Development Plan.</p> <p>Recommendation: Change 'Red' rating to 'Green'</p>	
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			<p>Important Trees, Woodlands & Hedgerows</p>	<p>Several large, mature trees are dotted around the boundaries and within the site itself, hedgerows are in small sections and there is a small copse of trees in the South Western corner of the site - all of these will need to be fully protected. Development would harm or require a substantial removal of mature trees and/or hedgerow.</p>	<p>In granting planning permission for the proposed holiday lodges, there were no objections in respect of the impact of that development on any trees or hedgerows within the site. Therefore, these should not prove to be an impediment to any future development, but would need to be assessed in the context of future development proposals</p> <p>Recommendation: Change 'Red' rating to 'Amber'</p>	
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			<p>Relationship with existing pattern of built development</p>	<p>A weak relationship with the current built form and creates an incursion in to the Countryside so would denigrate the rural character and feel of this Countryside entrance to the village. Would considerably harden and undermine the landscape integrity of this side of the village. The site is adjacent to existing residential property, so additional planting could help to mitigate this loss of amenity.</p>	<p>The previous rural character of this part of the village has now been fundamentally changed by the recent approvals of planning permission and can no longer be regarded as having a rural character.</p> <p>Furthermore, with the development of the adjoining housing site, this site will have a strong relationship with the built form of the village.</p> <p>Recommendation: Change 'Amber' rating to 'Green'</p>	
			<p>Impact on the Conservation Area or its setting</p>	<p>The site is wholly within the Hallaton Conservation Area and this area should be fully protected from new obtrusive, residential development.</p>	<p>The Neighbourhood Plan supports other residential development within the Conservation Area and therefore the location of this site within the Conservation Area should not be seen as an impediment to its development, and as noted above the site has already been given a consent for new holiday lodges, suggesting that the development of this site will not harm the character of</p>	

					<p>appearance of the Conservation Area.</p> <p>Furthermore, the NPPF urges local planning authorities to look for opportunities for new development within Conservation Areas.</p> <p>It is considered that the impact of any future development should be left to a proper assessment having regard to the statutory framework and policies in the NPPF and Development Plan.</p> <p>Recommendation: Change 'Red' rating to 'Green'</p>
			Safe pedestrian access to and from the site	<p>No current provision although a footpath is found fairly nearby on North End, very expensive to add additional footway although this may well require additional owners consent to ensure pedestrian connectivity with the village centre.</p>	<p>A requirement of the planning permission on the neighbouring housing site is to extend the footpath along North End to its junction with Hunts Lane. This will provide a safe footway connecting this site with the remainder of the village.</p> <p>Recommendation: Change 'Red' rating to 'Green'</p>

			<p>Safe vehicular access to and from the site</p>	<p>No adequate vehicular provision is possible into the site. Vehicular access will be very difficult due to the size of the current highways provision and its sensitive location.</p>	<p>The site has an existing access to North End capable of serving the three holiday lodges. It therefore seems reasonable to assume that it will be possible to provide an access capable of serving a new housing development that will meet the standards of the County Highway Authority.</p> <p>Recommendation: Change 'Amber' rating to 'Green'</p>
			<p>Distance to designated village centre, Stenning Hall.</p>	<p>A walking distance of about 260m to the village centre community facilities.</p>	<p>The walking distance to the village centre was not an impediment in allowing the development on the adjacent site, and would not be an impediment to development on this site.</p> <p>Recommendation: Change 'Amber' rating to 'Green'</p>

			<p>Gas, oil, pipelines and networks & electricity transmission network</p>	<p>A telephone supply cable is found within the site and this will require resiting.</p>	<p>The costs of resiting a telephone supply cable is a matter for any future developer, but should not be seen as an impediment to development on this site.</p> <p>Recommendation: Change 'Amber' rating to 'Green'</p>		
			<p>Any contamination issues</p>	<p>A large adjacent site was previously used extensively as an uncontrolled landfill and this is recognised as a potential contamination zone in the HDC SHLAA, a professional contamination survey is essential and the cost of full remediation works may undermine the economic viability of this small site.</p>	<p>Impact of any contamination is a matter for any future developer and cannot be resolved until a full survey and mitigation strategy is considered, but it should not be as an impediment to development on this site, particularly as consent has been given for the erection of three holiday lodges.</p> <p>Recommendation: Change 'Amber' rating to 'Green'</p>		
<p>4.0</p>			<p>In our view a review of this site's assessment would result in an overall RAG rating of 21, which betters the rating of any of the allocated sites, based on these revised assessments:</p>				

	HBE3	<table border="1" data-bbox="896 193 1722 416"> <thead> <tr> <th></th> <th>Original Rating</th> <th>Revised Rating</th> </tr> </thead> <tbody> <tr> <td>Red</td> <td>6</td> <td>0</td> </tr> <tr> <td>Amber</td> <td>9</td> <td>6</td> </tr> <tr> <td>Green</td> <td>12</td> <td>21</td> </tr> </tbody> </table> <p><i>Objection to Neighbourhood Plan Policy HBE3 - Summary</i></p> <p>4.0 This site on North End is a small, well defined site on the edge of the existing settlement with a direct frontage to an adopted highway. It is a highly sustainable site, within a short walk of the village centre, and its development will not harm any designated heritage assets. It is our contention that the revised RAG ratings amply demonstrates that this is an appropriate site for residential development and it should therefore be allocated for residential development in the Neighbourhood Plan, particularly as the development of this site for up to 3 dwellings would not disproportionately exceed the settlement's minimum housing requirement having regard to the provisions of Policy GD2 of the Development Plan.</p>		Original Rating	Revised Rating	Red	6	0	Amber	9	6	Green	12	21
	Original Rating	Revised Rating												
Red	6	0												
Amber	9	6												
Green	12	21												
<p>Severn Trent Water Strategic Catchment Planner growth.development@severntrent.co.uk</p>	HBE1	<p>Hallaton Neighbourhood Plan Consultation Thank you for the opportunity to comment on your consultation. Severn Trent are generally supportive of the Submission Version of the Hallaton Neighbourhood Plan, there are however a few amendments that we feel would provide a more resilient Neighbourhood Plan.</p> <p>Policy HBE1: Design Standards Bullet point 7 references enhancing Biodiversity Severn Trent are generally supportive of this approach and are understand the wider benefits of retaining Trees and Hedges. We would also recommend that Watercourses are retained as open features due to the importance they have to the ecological system and the</p>												

	<p>natural conveyance of surface water. Ideally these should be retained in open space so that they can be developed as Blue – Green corridors enhancing ecology and Biodiversity. To this effect we would recommend that Bullet point 7 is amended to read: <i>“Development will include a need to enhance biodiversity and relate well to the topography of the area, with existing trees, hedges and watercourses are preserved whenever possible. Provision should be made for wildlife including roof design, bat and bird boxes, hedgehog friendly fencing and the use of hedges; “</i></p> <p>Reasons for including these comments within your policy include: National Planning Policy Framework (2018) paragraph 170 States: <i>“Planning policies and Decisions should contribute to and enhance the natural and local environment by:</i> <i>a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their Statutory Status or identified quality in the development plan);</i> <i>b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;</i> <i>c) maintaining the character of the undeveloped coast, while improving public access to it where appropriate;</i> <i>d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;”</i></p> <p>Bullet point 10 refers to sustainable design, we are supportive of this in particular the reference to water efficiency. Further detail on our water efficiency position can be found below. However to provide clarity within the Neighbourhood Plan, on what is intended by water efficient design. we would recommend that words to the effect of the following re included within bullet point 10. <i>“All development should be design in accordance with the optional water efficiency target of 110 l/p/d, as per Building Regulations Part G”</i></p> <p>Reasons for supporting the inclusion of this wording within policies include: National Planning Policy Framework (July 2018) Paragraph 149 states: <i>“Plans should take a proactive approach to mitigating and adapting to climate change, taking into account the long-term implications for flood risk, costal change, water supply, biodiversity and landscapes, and the risk of overheating from rising temperatures. Policies should support appropriate measures to ensure the future resilience of communities and infrastructure to climate change impacts, such as providing space for physical protection measures, or making provision for the possible future relocation of vulnerable development and infrastructure.”</i></p> <p>The option efficiency target can only be required of a development where a planning condition is implemented. However, outlining this expectation within the Neighbourhood Plan will help to ensure that developers account for this design requirement from the outset, and support the implementation of a condition to ensure appropriate water efficiency is achieved. Alongside water efficiency we would also recommend that a</p>
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		<p>statement is included to ensure that developers consider opportunities to incorporate water re-use within developments.</p> <p>Bullet point 11 refers to the implementation of Sustainable drainage Systems, As identify within the SuDS Manual (Ciria C753) it is critical that drainage design is considered early within the design process, this enable natural flow routes and Sub catchments to be considered. Under NPPF and the Written Ministerial Statement for Sustainable Drainage (HCWS 161) All major development will be required to incorporate SuDS. The management of surface water has the potential to have a substantial impact on the sewerage infrastructure therefore Severn Trent are keen that this design element is considered early to ensure good design. We would also recommend that a reference to the Drainage Hierarchy Planning Practice Guidance paragraph 80 is also made directing surface water away from the sewerage system and into sustainable outfalls such as infiltration or watercourses. We would therefore recommend that:</p> <p><i>All applications for new development shall demonstrate that all surface water discharges have been carried out in accordance with the principles laid out within the drainage hierarchy, in such that a discharge to the public sewerage systems are avoided, where possible.</i></p> <p>Reasons for including this wording within your policies include: Planning Practice Guidance Paragraph 80 (Reference ID: 7-080-20150323) states: <i>“Generally the aim should be to discharge surface water run off as high up the following hierarchy of drainage options as reasonably practicable:</i></p> <ol style="list-style-type: none"> <i>1. into the ground (infiltration);</i> <i>2. to a surface water body;</i> <i>3. to a surface water sewer, highway drain, or another drainage system;</i> <i>4. to a combined sewer.”</i> <p>And <i>All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are put in place unless demonstrated to be inappropriate.</i> <i>All schemes for the inclusions of SuDS should demonstrate they have considered all four aspects of good SuDS design, Quantity, Quality, Amenity and Biodiversity, and that the SuDS and development will fit into the existing landscape.</i> <i>The completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure that the SuDS are maintained in perpetuity.</i> <i>Where possible, all non-major development should look to incorporate these same SuDS principles into their designs.</i></p> <p>We would note that the LLFA should be consulted on the wording regarding SuDS, as we appreciate that they have the main responsibility to advising the LPA on surface water / SuDS design considerations.</p>
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	ENV1	<p>Policy ENV1: Protection of Local Green Spaces Severn Trent understand the importance of local green spaces and are generally supportive of the protection of these areas. We would however note that policy should not be written in such a way that it would prevent flood alleviation works within areas of green spaces provided that the primary function of the green space is not adversely impacted, some emaple wording for this statement is: <i>Development of flood resilience schemes within local green spaces will be supported provided the schemes do not adversely impact the primary function of the green space.</i> There are a number of cases where green SuDS solutions to flooding issues have been implemented that have also enhanced open spaces by increasing biodiversity and amenity.</p>
	ENV3	<p>Policy ENV3: Important Open Spaces See comments to Local Green Spaces ENV 1:</p> <p>Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.</p> <p>For your information we have set out some general guidelines that may be useful to you.</p> <p>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. 4</p> <p>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.</p> <p>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</p>

	<p>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.</p> <p>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/</p> <p>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.</p> <p>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.</p> <p>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:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Single flush siphon toilet cistern and those with a flush volume of 4 litres. <input type="checkbox"/> Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute. <input type="checkbox"/> Hand wash basin taps with low flow rates of 4 litres or less.
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		<p><input type="checkbox"/> Water butts for external use in properties with gardens.</p> <p>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/</p> <p>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.</p> <p>We hope this information has been useful to you and we look forward in hearing from you in the near future.</p>
<p>Sport England Sport Park, 3 Oakwood Drive, Loughborough, Leicester, LE11 3QF</p>		<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the National Planning Policy Framework (NPPF), identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process. Providing enough sports facilities of the right quality and type in the right places is vital to achieving this aim. This means that positive planning for sport, protection from the unnecessary loss of sports facilities, along with an integrated approach to providing new housing and employment land with community facilities is important.</p> <p>It is essential therefore that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the NPPF with particular reference to Pars 96 and 97. It is also important to be aware of Sport England’s statutory consultee role in protecting playing fields and the presumption against the loss of playing field land. Sport England’s playing fields policy is set out in our Playing Fields Policy and Guidance document. http://www.sportengland.org/playingfieldspolicy</p> <p>Sport England provides guidance on developing planning policy for sport and further information can be found via the link below. Vital to the development and implementation of planning policy is the evidence base on which it is founded. http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 97 of the NPPF, this takes the form of assessments of need and strategies for indoor and outdoor sports facilities. A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. If it has then this could</p>

	<p>provide useful evidence for the neighbourhood plan and save the neighbourhood planning body time and resources gathering their own evidence. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England’s guidance on assessing needs may help with such work. http://www.sportengland.org/planningtoolsandguidance</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government’s NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England’s Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-</p>
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	<p>HBE4: Reserve Site Allocation</p>	<p>Within the Council’s final objection comments to this application (HDC ref. 18/01266/FUL), it states that the accompanying Highways Report ‘seriously underestimates the likely impact of this development on traffic and highways’ and ‘fails to account for the character and structure of local transport infrastructure’. This highlights the grave concerns regarding this particular part of the village.</p> <p>It goes on to reference the ‘dangerous blind corner where North End adjoins East Norton Road, opposite the Fox Inn’, before stating that the increase in traffic volume along this road would ‘certainly affect the safety of road users and pedestrians at this junction’. Given that the strongly opposed application was approved, it is startling that the HNPAC are looking to allocate all of the additional numbers to either take sole access from North End or be located in very close proximity to the junction which they already believe to be dangerous.</p> <p>We believe that greater assessment should be made to the cumulative highway impact that all of the developments will combine to have on the local area. In addition to the actual impact upon the highway, development of the allocations will also have an adverse impact on the numerous important open spaces, and heritage assets in the vicinity.</p> <p>When given the significant weight it rightly deserves, this cumulative adverse impact clearly outweighs any benefit of allocating the three small scale sites. We would therefore recommend that the HNPAC reviews the allocations and focus the residual housing requirement in a more suitable location, such as Cow Close. Regarding the sites specifically, there are clear concerns over the deliverability of the Site 2 in line with the policy, as well as the desire of the landowner in this regard. Two application have been submitted in recent years proposed just 2 dwellings (under the allocation). Neither have been permitted, with the second refused due to adverse impact on the character and appearance of the Hallaton Conservation Area and adjacent Listed buildings. Concerns were also raised as to the impact on neighbouring residential amenity.</p> <p>The NP offers no evidence as to how this could be overcome, or justification for the approach in allocation, and therefore the site should not be considered for inclusion within the NP.</p> <p>In addition to the highways concerns raised previously, it is also clear that development of Site 3 would likely cause considerable and significant harm to the setting of the Conservation Area and surrounding Listed buildings. Again, no justification has been provided within the NP as to how the site can be delivered without significant detrimental impact to the heritage asset. It provides no evidence to support the selection of the site or why it should be considered acceptable.</p> <p>We support the inclusion of the Cow Close site within the Plan, albeit as the Reserve Site, however we strongly question the appropriateness of the extremely descriptive development requirements when balanced against the triggers for the site to come forward. These criteria were discussed during past negotiations at an early stage of the NP and cannot be considered to have ‘all been agreed with the landowner and agent’, as the NP states.</p>
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	HBE6: Affordable Housing	<p>We are also surprised that these strict housing-mix criteria are not being applied to the preferred allocation sites.</p> <p>Given that the site will only come forward in the event of a ‘substantial shortfall... of existing housing sites’ or an increased requirement assigned by Harborough District Council, we believe that Policy HBE4 offers little flexibility in its current form to deliver the local needs when the ‘trigger’ is met. We fully agree that there should be a focus upon building regulation standards, as well as on the building design and ‘character areas’ to ensure development in keeping with the character and appearance of Hallaton, however the Plan needs to allow for up-to-date assessment of the shortfall or local needs at the time of the site coming forward.</p> <p>This policy looks to highlight the ‘key issue’ of housing affordability across the Parish and demonstrates the local support for the provision of more affordable units across a range of tenures. However, the allocation of three small scale development sites will further intensify the situation, as it results in no requirement for the delivery of affordable housing of any type, or S106 financial contribution to offset this.</p> <p>Multiple small scale developments will not provide a robust strategy to deliver new homes and on this basis, it is our recommendation that the Hallaton NP place greater focus on a comprehensive development that will not only deliver the residual housing requirement needed to sustain predicted growth, but will also provide guaranteed benefits to the wider community.</p> <p>In summary, the landowners support the key visions and objectives set out within the Hallaton Neighbourhood Plan. However, we believe that in order for the NP to deliver on these, it would be of greater benefit to reassess the focus of development away from small scale sites to a comprehensive scheme, such as at Cow Close, that will contribute both physically and financially to the needs of the community, whilst allowing flexibility to accommodate future housing needs in the village.</p> <p>At this stage in the preparation, it is vital for the HNPAC to fully consider the cumulative adverse impacts that the proposed allocation and recent approval would have on the local highway network, in light of the Parish Council and local communities justified concerns.</p>
Resident Hallaton LE16 8UQ	Overall Plan HBE1 HBE2 HBE5 HBE6 HBE7	I wanted to record that I support the Neighbourhood Plan, in particular the policies that support the development of design standards (HBE1), Limits to Development (HBE2), Housing Mix (HBE5), Affordable Housing (HBE6) and Accessible Housing (HBE7)

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