

Leire 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
1	Severn Trent Water	<p>Policy H1: Residential Site Allocation</p> <p>Policy H4: Limits to Development</p>	<p>Thank you for the opportunity to comment on your consultation, Severn Trent are generally supportive of the principles outlined within the plan, however there are a few aspects that we feel could be enhanced to better support the plan objectives and deliver wider benefits as a result of minor alterations or additions.</p> <p>Policy H1: Residential Site allocation Severn Trent would note that we would not anticipate any significant impact from the development of 5 additional houses due to the small scale of the development provided Surface water is managed and discharged to a sustainable source in accordance with the Drainage Hierarchy. It is noted that there is a Sewer indicated to be running through the proposed development site, therefore consultation with Severn Trent's Asset Protection Department will be required to assess the impact of the existing asset on the proposed layout. It is important that existing sewerage and drainage assets are protected we would therefore recommend that a reference to this is included within policy H1, further advice on the protection of existing assets is covered within our response to Policy H5: Design Standards.</p> <p>Severn Trent are supportive of the approach to promote the protection of existing features such as Streams detailed within bullet point b.</p>

		<p>Policy H5: Design Standards</p> <p>Severn Trent are supportive of the approach outlined within bullet points j and k, regarding the use of sustainable development including water efficiency and the use of Sustainable Drainage Systems (SuDS). We would however recommend that these aspects are expanded to provide greater clarity on the expectations for:</p> <ol style="list-style-type: none"> 1) Sustainable Drainage systems (SuDS) 2) Implement the principles of the Drainage Hierarchy 3) Incorporate water efficient design and technology 4) Protection of Existing assets <p>Drainage Hierarchy</p> <p>The drainage hierarchy outlined the principles of where surface water should be discharged, the hierarchy is outlined within Planning Practice Guidance paragraph 80 (Reference ID: 7-080-20150323). Severn Trent request evidence that the drainage hierarchy has been followed by developers in our conversations, however by raising the expectation at the Neighbourhood Plan stage it consideration can be incorporated into the initial a site designs resulting it better continuity of surface water through development.</p> <p>To aid in the interpretation of this request we would recommend that the following wording is incorporated into Policy R1:</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>SuDS (Sustainable Drainage Systems)</p> <p>Severn Trent note that Planning Policy already requires major development to incorporate SuDS through the written Ministerial Statement for Sustainable Drainage (HCWS 161) and NPPF. However current policy is very flexible on how SuDS can be incorporated into development, by incorporating appropriate references to SuDS in Policy R1, the need for developers to deliver high quality SuDS can be secured. Current Industry Best Practice for SuDS (The SuDS Manual CIRIA C753) highlights the need to consider SuDS from the outset of the design process and not to fit SuDS to the development site post layout. To aid in the delivery of this recommendation we would recommend wording to the effect of:</p>
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			<p>Protection of existing Assets</p> <p>The ongoing performance of both Drainage (natural or Manmade), Sewerage and water supply infrastructure is vital to support life within existing properties and new development sites therefore the protection of these assets is important, Severn Trent would therefore recommend that Policy H5 highlights the need to protect these features, some example wording is provided below.</p> <p><i>No development shall prevent the continuation of existing natural or manmade drainage features, where watercourses or dry ditches are present within a development site, these should be retained and where possible enhanced.</i></p> <p><i>Access to drainage features for maintenance should be retained and ownership of land clearly defined as part of the overall site maintenance plan.</i></p> <p><i>Prior to the alteration of any alignment an assessment will be required to ensure that all connections into the watercourse or Sewer are retained and that exceedance flows are not then directed away from the watercourse channel towards properties.</i></p> <p>The supporting text for the policy should also include:</p> <p><i>The removal of watercourses and ditches from development sites, presents a risk for future growth and development in such that links to the natural water cycle can be removed resulting in a potential increase of on site and off site flood risk. The removal of these features would result in an increased need to connect surface water to the sewerage network, as identified above this is against the drainage hierarchy outline in the Planning Practice Guidance.</i></p> <p>Policy ENV1: Local Green Spaces</p> <p>Severn Trent understand the need for Local Green Space and the need for it to be protected, however Local Green Spaces can provide suitable locations for schemes such as flood alleviation to be delivered without adversely impacting on the primary function of the open space. If the correct scheme is chosen, the flood alleviation schemes can result in additional benefits to the local green space in the form of biodiversity or amenity improvements. We would therefore recommend that the following point is added to Policy ENV1 to support the delivery of flood alleviation projects where required within green spaces..</p> <p><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></p>
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			<p>Sewage Strategy</p> <p>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</p> <p>We expect surface water to be managed in line with the Government's Water Strategy, Future Water. The strategy sets out a vision for more effective management of surface water to deal with the dual pressures of climate change and housing development. Surface water needs to be managed sustainably. For new developments we would not expect surface water to be conveyed to our foul or combined sewage system and, where practicable, we support the removal of surface water already connected to foul or combined sewer.</p> <p>We believe that greater emphasis needs to be paid to consequences of extreme rainfall. In the past, even outside of the flood plain, some properties have been built in natural drainage paths. We request that developers providing sewers on new developments should safely accommodate floods which exceed the design capacity of the sewers. To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/</p> <p>Water Quality</p> <p>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</p>
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			<p>reduced site run off and sewer flows. Rainwater Harvesting as a development rather than on a property by property basis is more cost efficient and can produce greater benefits.</p> <p>Both the River Severn River Basin Management Plan (Page 52) and the Humber River Basin Management Plan (page 46) recommend that Local Plan set out policies requiring homes to meet the tighter water efficiency standard of 110 litres per person per day <i>as described in Part G of Schedule 1 to the Building Regulations 2010</i>. As such Severn Trent's recommendation is consistent with wider objectives within our water supply regions. We hope this information has been useful to you and we look forward in hearing from you in the near future.</p>
2	Environment Agency		<p>We have reviewed those environmental constraints associated with the Plan and for which we have a remit (e.g. flood zone, main river). Whilst there is an element of flood zone in the Eastern most part of the Plan area we note there are no proposals for development (i.e. site allocations) within an area identified as being at flood risk. There are no other environmental constraints for which we have a remit and therefore we have no formal comment to make on the submission.</p>
3	Resident	<p>H1</p> <p>Pages 1 and 4</p> <p>Pages 3-7</p>	<p>There has been a lack of direct consultation for those residents most affected by the provision H1. Residents affected have been misled and ignored. The number of residents actually involved in the process has been minimal.</p> <p>In the 'Consultation Statement' there are claims that information was 'readily available and accessible to everyone' (page 1) and to make sure that 'consultation feedback was available as soon as possible after events'.</p> <p>Email's to Leire Parish with concise questions about access have gone left with no clear direct answer.</p> <p>Repeated requests to see the the RAG scores in the SSA(Appendix 5 in the NP)have been ignored via email. Almost to the extent that it appears that it was never completed. The information should be freely available for all to access under freedom of information. Question 15 of the SSA is about access. There has been no conformation how 'Leire 4a' scored in this particular aspect. A very narrow access point is insufficient for access of emergency vehicles.</p> <p>Two years ago the owner of 'Orchard Cottage' with an arrangement with the owners of 'The Cottage' demolished a wall in order to widen the access to 3.7m. This action should have required planning permission and should have been seen as this wider development. No planning permission is available</p>

		<p>Leire Neighbourhood Plan. Pages 18-19 Policy H1</p> <p>Leire Neighbourhood Plan. Pages 18-19</p> <p>Leire Neighbourhood Plan. Pages 18-19 Policy H1</p>	<p>on HDC Website. The movement of the boundary has not been notified to the Land Registry. Access to this site is extremely limited and congested from St Peters Close.</p> <p>St Peter's Close is a small residential area and is used by the Public House and Church go'ers as parking. Access to the proposed development is inadequate and not wide enough for emergency vehicles, lorries or waste collection vehicles. It also runs directly by the gable end of a house. Leire PC have ignored these comments and are determined to include the land in the plan under policy H1. Aleady this year a vehicle crashed into a wall on Main Street as a result of parked cars and last month (April2021) the Parish Council asked all residents on Main Street, if possible to park off the street.</p> <p>At the October 2019 Parish council meeting residents listened to a presentation by Andrew Granger to build five houses on the land behind St Peter's Close with access from a small private drive off St Peter's Close. The Parish Council in response stated that 'Leire needed no extra houses to comply with HDC requirements' and that 'the site was poorly sited with an inadequate access, off a congested small close. Despite this page 18 of the Leire NP includes the site for five residential units. This complete change of direction was not made clear to residents until the final consultation period in July 2020. All residents of St Peter's Close have objected and made valid arguements but all have been ignored.</p>
4	Resident	<p>Section 1 and Section 5.1 - in particular the Greenfield</p>	<p>Objection 1 of 2 -</p> <p>The residential allocation does not contribute to the achievement Of sustainable development and the plan as a whole is not in General conformity with the strategic housing policies in the Recently adopted local plan It therefore does not meet the necessary basic conditions in Paragraph 8(2)(e) of schedule 4b of 1990 act.</p> <p>The Spatial Strategy and sustainability Paragraph 1.6.7 of the LP confirms that, with the exception of a</p>

		<p>Residential Allocation on pages 18 and 19</p> <p>specific list of policies on page 7, NPs should be in general conformity with all policies of the Local Plan because they are considered to be strategic. Paragraph 3.1.6 of the LP explains that the settlement hierarchy provides the FRAMEWORK from which the spatial strategy has evolved and SUSTAINABLE DEVELOPMENT can be realised across the District to 2031.</p> <p>The Local Plan does not view Leire as a sustainable location for housing The LP - with its Sustainability Appraisal forming an important part of the evidence base - has established that no housing is expected to take place in the Leire Neighbourhood Area. This reflects the sustainability hierarchy of settlements found in Appendix F of the LP. Leire is at the bottom of the hierarchy and is in the classification of 'Rural Villages and other Settlements'. Paragraph 3.1.14 of the LP confirms that these are not considered sustainable locations for housing development.</p> <p>NP allocations not in 'Rural Villages and other Settlements' Criterion (v) of Policy SS1 in the LP plans about 307 dwellings on non-allocated sites or sites to be allocated in NPs for 'Rural Centres and Selected Rural Villages'. Leire does not fall within this settlement category and therefore a Greenfield Residential Allocation - as part of the NP's overall approach to housing provision - is not in general conformity with the LP's strategic policies and does not contribute to the achievement of sustainable development.</p> <p>With reference to Government's PPG (paragraphs 74 and 76) we would argue that:-</p> <ul style="list-style-type: none"> ● The Greenfield Residential Allocation does not support or uphold the general principle that the housing location strategic policy is concerned with ● There is a strong conflict between the NP's stance and the DC's strategic policy ● The rationale for the approach taken in the NP is to "future proof" the NP (page 18) but there is no evidence to justify the need or desirability of the Greenfield Residential Allocation, especially when taking the history of windfall sites (page 18), proposed Policies H2 (Windfall Sites) and H4 (Limits to Development) and the views of the community in the CS into account ● The Greenfield Residential Allocation does not achieve the vision and aspirations of the LP ● The Greenfield Residential Allocation does not represent the sustainable development of a previously-developed site <p>For the above reasons we do not concur with the assertion of the NP (page 8) that its aim and policies are centered on the achievement of sustainable development. A Greenfield Residential Allocation in Leire</p>
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		<p>undermines the overarching direction and wider vision of the Local Plan in respect of housing supply.</p> <p>Criterion (a) specifies the following sizes:-</p> <ul style="list-style-type: none"> ● 2 x 2 bed bungalows ● 2 x 3 bed houses ● 1 x 4 bed house <p>AND that the three houses can be 'swapped' for bungalows of any size. The housing need is for one and two bed dwellings</p> <p>On page 11 of the NP it is confirmed that there is a significant under representation of small housing units (just 15.3% having one or two bedrooms). Appendix 3 of the NP (pages 5 and 11 in particular) also discusses the need for smaller homes of one AND (not 'or') two bedrooms which would be suitable for residents needing to downsize, small families and those entering the housing market.</p> <p>Paragraph 103 of the PPG states that "Any neighbourhood plan policies on the size or type of housing required will need to be informed by the evidence prepared to support relevant strategic policies, supplemented where necessary by locally-produced information".</p> <p>However, this is not the case because:-</p> <ul style="list-style-type: none"> ● 60% of the proposed Greenfield Residential Allocation would have more than two bedrooms ● no one-beds are proposed at all ● the proposed Policy supports three potentially very large bungalows (with more than 4 beds as part of the 'swap') in addition to the two x 2 bed bungalows. This would not provide a balanced mix or meet the identified need. <p>Criterion (b) of Policy H1 states that a minimum of two of the dwellings will be affordable. Affordable requirement for a scheme with fewer than ten dwellings This requirement does not comply with Policy H2 in the LP because the Residential Allocation has fewer than ten dwellings. Furthermore, proposed Policy H1 does not specify the nature of the affordable units. Paragraph 62 of the NPPF confirms that "Where a need for affordable housing is identified, planning policies should specify the type of affordable housing required".</p>
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		<p>Consultation Statement Pages 3 and 7</p>	<p>As a consequence, we don't feel that the community has been able to help shape the vision for Leire - and especially sustainable development. In our opinion, the requirements of Section 15 (2), Part 5 of the Neighbourhood Planning (General) Regulations 2012 have not been satisfactorily fulfilled.</p> <p>DETAILS OF PEOPLE AND ORGANISATIONS</p> <p>Minutes of theme groups are not available</p> <p>Paragraph 015 of the PPG confirms that the relationship between any group and the formal functions of the PC should be transparent to the wider public. It confirms that the terms of reference for a steering group should be published AND the minutes of meetings made available to the public.</p> <p>The Minutes of the LNPAC Meeting in June 2018 stated that all documents, agendas and notices need to be filed "PROVIDING TRANSPARENCY TO ALL" (f). At the LNPAC Meeting in September 2019 it was stated that the minutes/emails from theme groups should be shared with the Clerk to ensure that everyone is aware of any developments (5). However, these are not available on the PC's website. Only landowners have been able to review the RAG scores in the SSA (Appendix 5 in the NP)</p> <p>The Minutes for the LNPAC Meeting in November 2019 confirmed that the RAG scores of the potential housing sites were to be sent to the landowners to review (4). However, the public has not been able to see an accompanying map of the sites or the breakdown of the RAG scores and the outcome of this review has not been made public.</p> <p>Paragraph 049 of the PPG explains that where options have been considered as part of the neighbourhood planning process earlier engagement should be used to narrow and refine options so that the document that is consulted on at the pre-submission only contains the preferred approach. This earlier engagement with the wider community in respect of the RAG sites did not take place.</p> <p>Furthermore, contrary to the claim on page 18 of the CS, Appendix 5 does not provide DETAILED information on the SSA.</p>
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		<p>pages 22 - 53 (our formal Regulation 14 response)</p>	<p>However, no accompanying site maps were available with the SSA and the breakdown of the overall scores was not able to be viewed - despite making formal requests at the Regulation 14 stage of the process. This does not reflect one of the 'Aims of the CS' on page 1:- "Ensure that information was readily available and accessible to everyone". This breakdown is still not available at this Submission stage of the process despite the Appendix to the CS (number 17) confirming that it would be.</p> <p>A SUMMARY OF THE MAIN ISSUES AND CONCERNS RAISED THROUGH THE CONSULTATION PROCESS AND HOW THEY WERE CONSIDERED</p> <p>Arguments against the principle of the Residential Allocation (a DECISION taken EARLY on in the process) have simply been dismissed Numbers 1, 6, 10, 31, 36, 56 and 67 in the Appendix of the CS confirm that:- "The DECISION was taken EARLY on in the process to consider a site for Residential Allocation". We question why this specific 'starting point' was a DECISION that has not been specifically consulted upon. The principle of a Greenfield allocation does not appear to be supported by the community. Where is the fundamental question - 'Do you agree with a Greenfield Residential Allocation in Leire?' Notably, the analysis of Question 5 in the 2018 Questionnaire confirms that the majority oppose development at the edge of Leire. And also, in terms of its 'justification' it has not been explained exactly WHY 'inappropriate development' would be approved if there is no Residential Allocation in Leire (which is not classed as a sustainable settlement):- "Allocating a site for limited development through the NP affords greater protection against inappropriate development in more sensitive areas" Page 8 of the CS states that "There has been detailed analysis after each consultation event or questionnaire which has informed the next step of drafting the plan". We cannot find where this analysis confirms support for the DECISION that was taken early on in the process. Alternative views have simply been dismissed as part of the Regulation 14 consultation, citing the 'justification' above. The link on the PC's website for the analysis of the 2018 event is not for the correct document. The Residential Allocation is a 'backland development', despite the NP confirming that there is a lack of support for 'backland development' Paragraph 047 of the PPG sets out that a QB should be inclusive and open in the preparation of its NP and ensure that the wider community is made aware of how their views have informed the NP. However, despite the NP confirming that there is a LACK OF SUPPORT for 'backland development' (top of page 21 in the NP)</p>
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		<p>the Residential Allocation in Policy H1 is a 'backland' development. There is no explanation of this conflict.</p> <p>In relation to the above, we don't agree with the narrow definition of 'backland' development by the QB (top of page 21 of the NP). As we understand it, 'backland' development is usually defined as development on land behind the rear building line of existing housing or other development. It can be land that was formerly used as gardens OR is partially enclosed by gardens. The main factor is that the development, as opposed to access to the development, doesn't adjoin a public highway. With this in mind, we consider the proposed Residential Allocation Site to be a classic 'backland development'.</p> <p>There have been no meetings since January 2020 The Regulation 14 consultation was in July - August 2020. The LNPAC - and the Theme Groups - have not met since January 2020 and November 2019 respectively. It is therefore not clear how the Regulation 14 responses were actually dealt with locally (especially as the AGENT for the Residential Allocation Site has been allowed to provide a direct response in the CS - number 52). Page 8 of the CS explains that "the LNPAC was asked to consider the comments and possible amendments to the plan" but how was this done if the LNPAC has not met?</p> <p>From our point of view, it has not been demonstrated that this key process has been done in an open, transparent, consistent or objective way. Consequently, we feel that the evidence provided to support the choices made and the approach taken is not sufficiently robust.</p> <p>A lack of (video) meetings has been detrimental to the Plan-making process.</p> <p>Our formal Regulation 14 response was missing from the Consultation Statement until the 17th March 2021 and the response column on pages 22 - 53 is totally blank It is not clear how those producing the NP have sought to address the issues raised by us during the consultation process. Our formal response to the Regulation 14 Pre-Submission NP was not included in the CS until the 17th March 2021 (as confirmed by HDC's Validation document).</p> <p>Furthermore as the response column has been left totally BLANK from pages 22 - 53, the CS does not effectively address all representations received as part of the Regulation 14 Consultation.</p> <p>We were not given the opportunity to inform the content of the emerging NP as our matters were not duly considered. Our comments have simply been added 4/5 months after the Joint Chairs of the LNPAC dated the document in November 2020 (on page 8 of the CS).</p> <p>This does not reflect one of the 'Aims of the CS' on page 1:- "Ensure that consultation feedback was available as soon as possible after events"</p> <p>The response to number 52 in the Consultation Statement is made directly by the AGENT for the Residential Allocation Site</p>
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		<p>It is not understood why the AGENT for the Residential Allocation Site has been able to provide a direct response to HDC's comments in number 52 of the CS Appendix.</p> <p>Furthermore, when responding to HDC's comments about different site levels he has only discussed St Peters Close and not our property. The majority of the Greenfield Residential Allocation Site is higher than the land our house sits on and we are at the very narrow western end of the Site.</p> <p>The Minutes for the LNPAC Meeting in May 2019 confirmed that there was one individual in the group with land / building interest and Mr Corser declared an interest but no further details are provided (6). The Minutes for the Meeting in November 2019 confirmed that there were two landowners on the Committee and one representative present for another landowner (7). No details on this can be found either. In the circumstances, we feel that these interests should be clarified.</p> <p>The Historic Environment appears to have been overlooked in respect of Policy H1 Number 29 in the Appendix of the CS is from Historic England and they have referred the QB to the document entitled "Housing Allocations in Local Plans" (as it is also relevant for NPs). As a) part of the Residential Allocation Site lies within the Conservation Area b) adjacent Airedale Farm is a Listed Building and c) there is no mention of Heritage Assets in proposed Policy H1 or its supporting paragraphs (it is, however, the focus of criterion d in proposed Policy H4) we feel that a simple 'noted' response is not adequate. On this matter it is important to highlight the concerns of HDC on the Historic Environment (number 52 in the Appendix of the CS).</p>
5	Resident	<p>Leire Neighbourhood Plan Response</p> <p>My objection is based upon several points, not least of which was the lack of community engagement that is purported to have been undertaken by the 'Leire Neighbourhood Plan advisory Committee'. As someone whose property is listed as being within this plan, I never received even one notice (until early this year) that there was a plan being created and that stakeholders such as myself were allowed to contribute. Further, had there been community engagement on the creation of the steering group, I would certainly have put myself forward to be included in the group.</p> <p>The neighbourhood residents were not informed of the neighbourhood plan project, no notices regarding any public meetings were truly openly advertised. Given this, it stands to reason that the current committee were selected and informed individually (and undemocratically) rather than in a public capacity. This meant that residents like myself were not able to oppose anything or contribute any input into its creation. Leire is poorly represented in terms of ethnic minority inclusion, and this steering group did not take on board any diverse member, as can be seen by the picture contained in the NP of the committee members.</p> <p>Reporting the notices were advertised on Facebook and on the local notice board is just not good enough. Few residents</p>

		<p>subscribe to the Parish Council's Facebook page and by the very nature of using Facebook it was effectively advertised only to a few supporters of the Parish Council: this is far from democratic and clearly fails to fulfil the requirement of the neighbourhood plan process. The fundamental requirement of stakeholder involvement would have been through public meeting forums. This council was created privately without overall community input. This created inadequate community involvement for a plan that purports to be, and has some onus in being, inclusive of same. There was public election process to the steering group, resulting in myself and other residents being completely unaware of the project of creating a neighbourhood plan, and were also unable to put ourselves forward for election within this steering group.</p> <p>The date on the Leire NP is October 2020 which shows that it fell into Covid-19 shutdowns, and it seems reasonable to conclude it facilitated the undemocratic process that the group decided to further in their unilateral creation of a neighbourhood plan. Despite the fact that my property falls outside the proposed village development boundary, and hence should not be included in the plan, it is indeed included in this plan. As such, I had every right to be informed about it, and given a chance to be included in the process.</p> <p>Given the obviously poor representation in terms of stakeholders coming from the local ethnic minority populations, had the steering group formation and stakeholder engagement been publicly known, the formulation of same likely would have been different. Undoubtedly, the resulting plan would also have been different. There is no way to quantify the level of change that public representations would have made upon this plan had it been known by all concerned. As such, it is fair to repeat this process to gain comprehensive stakeholder views and not those of a small subsection of the area that does not represent the parish as a whole.</p> <p>Looking at their QB_responses_to complaints {2021 there is a common theme from respondents. That theme is lack of transparency by Leire Parish Council to involve and fully notify the residents of the aspect of the proposed plan; indeed, I emailed the Parish Council to voice my concerns and my responses have been suppressed in the QB responses document, I complain of victimisation by the Parish Council but unsurprisingly in the response from the Parish this aspect was ignored. This is very concerning and reinforces my argument of failure to engage with the residents as a community. I refer you to page 14 of the Leire Parish Neighbourhood Plan and the image used. This gives a very clear representation of ethnic and social diversity. I enclose a further letter I forwarded by Leire Parish Council in response to a planning appeal- the letter is written by Nick Cotton one of the Parish Councillors. This lack of ethnic and social diversity fundamentally undermines the democratic process and the existing draft Plan should fail.</p> <p>There have not been any consultations with all potential developers in relation to these plans; it has been created by carefully and privately selected community members only. Housing allocation within the plan was unfairly determined and the proposed allocation sits off a congested road in a conservation area. This creates issues relating to the creation of the proposed highway and will have a negative aesthetic impact on the conservation area, which is at odds with the terms of conservation and creates noncompliance with the conservation rules.</p> <p>There are in fact better locations for any potential housing need. The community cannot support the level of proposed development within this place for housing which has not been shown in the plan to be needed and the effects of which</p>
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		<p>have not been quantified since no developer has been brought in to create a model use design to consider. The Leire NP is also in contravention at some points with both the Harborough Local Plan and the National Planning Policy Framework, as can be seen below.</p> <p>MISALIGNMENT WITH EXISTING LOCAL PLAN</p> <p>The Local Plan for Harborough also designates Leire within the 'other villages and rural settlements' designation (page 250 of the Harborough Local Plan 2011-2031, table D.23) which holds a specific definition and designation. As stated in table D.23, this designation is defined as rural villages and settlements that do not meet the criteria for identification as Selected Rural Villages due to their size and/or level of services. Specifically, "Other villages and rural settlements are considered the least sustainable locations for growth and are covered by housing in the countryside policy. New housing will be limited to housing to meet an identified need (either through a housing needs survey or neighbourhood plan), housing to meet the needs of a rural worker, rural exception sites, isolated homes in the countryside in accordance with NPPF paragraph 79, and replacement dwellings."</p> <p>When considering the expansion through a known conservation area for housing development, the Leire Neighbourhood Plan does not show any need for such further housing development as would be necessary to align with the greater Harborough Local Plan. Harborough Local Plan identifies Leire Conservation Area as CA35. There was no housing needs survey included in the plan.</p> <p>Further misalignment exists in the Leire Neighbourhood Plan's incorporation of the idea of windfall site development. The Gov.uk website https://www.gov.uk/guidance/housing-and-economic-land-availability-assessment#method--stage-3-windfall-assessment-where-justified) lists Windfall assessment (where justified) as:</p> <p>How should a windfall allowance be determined in relation to housing? - A windfall allowance may be justified in the anticipated supply if a local planning authority has compelling evidence as set out in paragraph 70 of the National Planning Policy Framework. Local planning authorities have the ability to identify broad locations in years 6-15, which could include a windfall allowance (using the same criteria as set out in paragraph 7 of the National Planning Policy Framework .</p> <p>Paragraph: 023 Reference ID: 3-023-20190722, Revision date: 22 07 2019</p> <p>Following this format, paragraph 70 states "Where an allowance is to be made for windfall sites as part of anticipated supply, there should be compelling evidence that they will provide a reliable source of supply. Any allowance should be realistic having regard to the strategic housing land availability assessment, historic windfall delivery rates and expected future trends. Plans should consider the case for setting out policies to resist inappropriate development of residential gardens, for example where development would cause harm to the local area." There is no such submissions of compelling evidence of same within the Leire NP.</p> <p>Further, paragraph 67 of the National Planning Policy Framework also puts at odds the inadequate submission in the form of the Leire NP for same. Paragraph 67 states "Strategic policy-making authorities should have a clear understanding of the land available in their area through the preparation of a strategic housing land availability assessment. From this, planning</p>
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		<p>policies should identify a sufficient supply and mix of sites_, considering their availability suitability and likely economic viability. Planning policies should identify a supply of:</p> <ul style="list-style-type: none"> (a) specific, deliverable sites for years 1 to 5 of the plan period and (b) specific, developable sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15 of the plan. <p>Clearly, the Leire NP did not meet the requirement set out in paragraph 67 of providing a land availability assessment to make such strategic assessment from, nor were a mix of sites identified. Without such input and requirement need, it seems likely that a select group of residents are attempting to push specific furthered land usage or individual reasons that are not in relation to need or the public good, and which do not align to the requirements given to consider windfall land usage, especially within a conservation area.</p> <p>In the context of available properties in the area, Rightmove shows one property for Leire and 10 rental properties in a 3-mile radius. (https://rightmove.co.uk/property-to-rent/find.html?locationIdentifier=REGION%5E14887&radius=3.0&propertyTypes=&mustHave=&dontShow=&furnishTypes=&keywords=) and there are 3 further properties for sale in Leire (https://www.rightmove.co.uk/property-for-sale/Leire.html). This shows that there is available housing in the area and as such, there would be no need to use windfall property or housing development in the Leire conservation zone in its current form/size at the present time.</p> <p>National Policy Framework Cohesion</p> <p>While the Leire NP makes specific reference to dealing with the environmental agenda of sustainable development as outlined in the National Planning Policy Framework (019), page 5, which it leans on heavily, it neglects to point out that same policy framework on page 7 adds "These objectives should be delivered through the preparation and implementation of plans and the application of the policies in this Framework; they are not criteria against which every decision can or should be judged."</p> <p>https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/810197/NPPF_Feb_2019_revised.pdf</p> <p>Further, the National Framework Policy goes on to state "So that sustainable development is pursued in a positive way, at the heart of the Framework is a presumption in favour of sustainable development (paragraph 11)". Stated at paragraph 11 is: "Plans and decisions should apply a presumption in favour of sustainable development. For plan-making this means that:</p> <ul style="list-style-type: none"> a) plans should positively seek opportunities to meet the development needs of their area and be sufficiently flexible to adapt to rapid change. b) strategic policies should, as a minimum, provide for objectively assessed needs for housing and other uses, as well as any needs that cannot be met within neighbouring areas, unless: <ul style="list-style-type: none"> i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or
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		<p>ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole."</p> <p>The existing Leire NP does not show any flexibility since there are no option listed, nor does it show any ability to adapt to rapid change.</p> <p>On another worrying issue, the current plan outlines an area for development but goes on to state what developers would consider doing with same in the future. There is no existing proof that the lands outlined for such development would be used appropriately wit in a development, the intended layout of the new development, or in any way include enough detail to warrant being passed in its current form.</p> <p>In the context of alignment to the National Policy Framework, the current Leire NP , does not consider various considerations around conserving and enhancing the historic environment (page 54) which states: "Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account:. a) the desirability of sustaining and enhancing the significance of heritage assets, and putting them to viable uses consistent with their conservation; b) the wider social, cultural, economic an environmental benefits that conservation of the historic environment can bring; c) desirability of new development making a positive contribution to local character a distinctiveness; and d) opportunities to draw on the contribution made by the histric environment to the character of a place"</p> <p>The Leire NP also refers to 'consultation during the Neighbourhood Plan preparation on page 42 in relation to 'Important Views'. This is a point which would have been more fully discussed by community members if all of us, as stakeholders in the neighbourhood plan, were allowed the opportunity to input our views. In this regard, the National Planning Policy Framework refers specifically to this right of community on page 10 wherein it states "Neighbourhood planning gives communities the power to develop a shared vision for their area. Neighbourhood plans can shape, direct and help to deliver sustainable development, by influencing local planning decisions as part of the statutory development plan. "</p> <p>Not only is the Leire NP in its current format devoid of true community shared vision, but it also becomes significant in the latter context of how the plan will be used to shape and influence local planning decisions into the future. The nature of this group in the format it was selected ensures that the community as a whole do not get the opportunity to contribute their shared vision. The current plan is the work of a small, hand-select d group of people who do not represent the community's thoughts as a whole, and who set out to circumvent the whole community by not sharing the project details at large at all stages of its development.</p> <p>In conclusion</p> <p>In submission I strongly suggest that the preparation of Leire Neighbourhood Plan (NP) does not meet the legislative requirements as set out. The process was not democratic, failed to engage the community as a whole and was indeed created by a "cherry -picked" community - The Friends of Leire Parish Council.</p>
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			<p>The blatant failure to consult and engage with minority groups in itself must be considered suspicious. The general favour of the comments to this plan all state there was a fundamental lack of transparency by Leire Parish Council.</p> <p>The NP misaligns with both Harborough Councils Local Plan and the National Planning Policy Framework.</p> <p>For all the reasons stated above Leire Parish Neighbourhood Plan should f ii in its entirety at this stage and not be allowed to continue further without fundamental changes.</p> <p>Supporting Douments</p> <p>1. Letter from xxx (Parish Councillor) presented to an appeal hearing by the other members of Leire Parish Council:</p>
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			<p>For Planning Inspectorate meeting.</p> <p>Sir / Madam,</p> <p>I regret that I'm unable to get time off from work to attend this meeting but would like the following to be brought to your attention.</p> <p>Whilst I am a member of Leire PC, these are my own views, together with input from some of my neighbours.</p> <p>The building of structures in this property's area has been an ongoing source of work for Leire Parish Council, HDC (HDC) and the Planning Inspectorate (PI) for too many years now and yet despite numerous enforcement notices (and appeals against) the owner look to be running rings around HDC and the PI flouting whatever rules they want.</p> <p>I am puzzled why enforcement notices can be overturned on definitions (for example) of tidiness which I believe was the outcome of one such appeal. This area is a mess and that's that.</p> <p>I do not understand why enforcement notices are not being enforced and I and several of my neighbours do not understand the delay in taking proceedings against the owner.</p> <p>We have noted that a property in the neighbouring Biaby Council which had had an enforcement case started in 2015 has been through the courts and owners duly fined by February 2018 !</p> <p>This unhappy tale has been ongoing since before 2012.</p> <p>There is a feeling that the owner of the property is being 'allowed' to get away with ignoring the rules and notices due to their ethnicity which I hope this is not the case.. (Not just my sentiment)</p> <p>I would welcome the PI's support of HDC in these enforcements and a speedy resolution of matters to the benefit of the village.</p> <p>Mr Cotton</p> <p>Refer – 6/7/2012 HDC Letter re barn now residential</p>	
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			<p>2. email to Leire Parish Council following my first notification of this neighbourhood plan</p> <p style="text-align: center;">LEIRE NEIGHBOURHOOD PLAN PRE-SUBMISSION CONSULTATION COMMENTS FORM</p> <p>Please return by 17th August 2020 via</p> <p>E-mail: leirenp@yahoo.com</p> <p>Or by post to: Mr P Cawley-Rock, (Joint Chair, Leire NP) The Nook, Main Street, Leire, Leicestershire. LE175HE</p> <p>This is six-week pre-submission consultation on the Draft Neighbourhood Plan is the last time we will be asking people for comments before submitting the Plan to Harborough District Council</p> <p>All responses received by the above date will be considered and may be utilised to amend the Draft Neighbourhood Plan. A Consultation Statement including a summary of all comments received and how these were considered will be made available along with the amended Neighbourhood Plan. Please note we will not accept responses that are anonymous and that comments may be made public. Your personal details will not be made public.</p> <p>A copy of the Draft Neighbourhood Plan can be viewed online from 06.07.2020 at: https://www.leireparishcouncil.org.uk/</p> <p>Thank you for your help and support in the preparation of the Neighbourhood Plan for Leire Parish Council.</p>
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			<p>SECTION 2: Representation</p> <p>Where possible please indicate to which part of the draft Neighbourhood Development Plan each comment relates.</p> <p>Please provide your COMMENTS below and use an extra sheet if necessary.</p> <p>Paragraph number & Page number in Plan: Your comments:</p> <p>I was not invited to contribute or comment on the development of this plan.</p> <p>I was not invited to any <u>meetings</u></p> <p>The plan in relation to the Vale Cottage site is inaccurate. Ridge of furrow designation is wrong.</p> <p>I oppose the allocation and selection of suitable sites for affordable <u>housing</u> and I state that in my opinion the selection was not carried out with full consultation of all interested parties. <u>Again</u> I was not made aware or invited to contribute to this.</p> <p>Leire Parish Council has strategically and purposely victimised my family and <u>I</u>. They have created significant stress and suffering to us, isolated and alienated us as ethnic minorities in the rural countryside.</p> <p>A complaint has been made to the District Council accordingly.</p> <p>Your comments are welcomed.</p>
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		<p>3. Email response from Leire Neighbourhood Plan Group- rather than rising to the concerns of victimisation the complaint is ignored and a generic response regarding their consulting process tendered: 23 August 2020</p> <p>Thank you for your comments on the draft Neighbourhood Plan. We will be collating all the responses we receive and make amendments where necessary in light of these comments.</p> <p>However, in relation to the comment made in your response regarding not being invited to contribute or comment on the development of the plan or invited to any meetings I can say that the plan's creation has been very open and transparent. The plan has been an ongoing document created over the last 3 years. It has been led by a small group of Leire residents, completely in their own time, unpaid and voluntary. We have had regular open meetings and events in the village hall since early July 2018, all open to villagers to attend and give their input, as well as theme groups created and residents invited to join these last year. Information regarding all meetings and open events were posted online (via facebook/email,) on the village hall notice board and around the village frequently. Flyers, Christmas cards and posters have been displayed and delivered to every household in the village on numerous occasions as well as at the village fete to inform them about the plan and ask for their support to contribute to the formation of the plan. We have been as open and transparent as possible with villagers throughout the process.</p> <p>Once the revised Neighbourhood Plan approved by the Parish Council, we will submit the Plan to local planning authority), and all of the comments received and the formal response to the comments will be available on the Parish Council website.</p> <p>In due course, (local planning authority) will write to you offering you a further opportunity to comment on the revised Neighbourhood Plan, prior to being submitted for examination and referendum, which is likely to be later in the year.</p> <p>Thank you again for taking the trouble to comment on the draft document.</p> <p>Yours sincerely</p> <p>Leire Neighbourhood Plan Group</p>
6	Harborough Disability Action Group	<p>If you are using one of the recognised Consultants you may already be aware that this is about Access to Public Buildings, Public Places and adopted Highways Land – Defined as - carriageway/footway/verge, Public Greens and Open Spaces.</p>

		<p>Access to Private Houses, Elderly Persons Homes, Shops, Schools, Leisure Centres, Village Halls etc., are all covered by the BUILDING ACTS, Health & Safety legislation and reasonable steps should be taken to remove obstacles and improve access for hearing, visually impaired, wheelchairs and the ambulant disabled. Listed Buildings, e.g. churches do have more restrictions, but these can be dealt with.</p> <p>Country footpaths across fields are all identified and shown on Leicestershire County Council issued Parish Plans, and stiles should be replaced with such as kissing-gates. Steep climbs and drops or stepping-stones are not alterable due to their very existence.</p> <p>Village Greens, Open Spaces, Sports and Play Areas must be readily accessible by vehicle, or foot, with level firm parking areas within and near to buildings, and toilets where existing.</p> <p>Signage within and around villages must be clear, and maintained i.e. clean/readable. Black-on-Yellow is a better visible combination for the visually impaired, but other contrasts can work. Lettering and size is important - simple non-serif is preferred.</p> <p>Footways at pedestrian crossings or junctions should make use of tactile slabs, these can be felt when walking, and turning-buttons under lit CROSS NOW signs.</p> <p>Drop-kerbs should be at road junctions, for wheelchair and pram/buggy use. Raised kerbs should be at bus stops, where such services exist.</p> <p>This advice is offered by the Harborough Disability Access Group and is a general overview to cover the smallest hamlet to large towns, but 100% coverage cannot be guaranteed! Mr. Common-sense should be in use somewhere.</p>
7	Leicestershire County Council, County Hall Glenfield –	<p>Highways Specific Comments Page 18 – Housing Site Allocation The LHA would assess the site on its own merits, should a proposal be submitted for pre application advice or formally. The site access will need to be designed in accordance with the Leicestershire Highway Design Guide (LHDG) to ensure a safe and suitable access can be delivered in accordance with the National Planning Policy Framework (NPPF).</p> <p>General Comments</p> <p>The County Council recognises that residents may have concerns about traffic conditions in their local area, which they feel may be exacerbated by increased traffic due to population, economic and development growth.</p> <p>Like very many local authorities, the County Council's budgets are under severe pressure. It must therefore prioritise where it focuses its reducing resources and increasingly limited funds. In practice, this means that the County Highway Authority (CHA), in general, prioritises its resources on measures that deliver the greatest benefit to Leicestershire's residents,</p>

			<p>businesses and road users in terms of road safety, network management and maintenance. Given this, it is likely that highway measures associated with any new development would need to be fully funded from third party funding, such as via Section 278 or 106 (S106) developer contributions. I should emphasise that the CHA is generally no longer in a position to accept any financial risk relating to/make good any possible shortfall in developer funding.</p> <p>To be eligible for S106 contributions proposals must fulfil various legal criteria. Measures must also directly mitigate the impact of the development e.g. they should ensure that the development does not make the existing highway conditions any worse if considered to have a severe residual impact. They cannot unfortunately be sought to address existing problems. 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.</p> <p>In regard to public transport, securing S106 contributions for public transport services will normally focus on larger developments, where there is a more realistic prospect of services being commercially viable once the contributions have stopped 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 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.
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		<ul style="list-style-type: none"> • 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.</p> <p>Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing watercourses and land drainage (including watercourses that form the site boundary) are retained as open features along their original flow path and are retained in public open space to ensure that access for maintenance can be achieved. This should also be considered when looking at housing densities within the plan to ensure that these features can be retained.</p> <p>LCC, in its role as LLFA will not support proposals contrary to LCC policies.</p> <p>For further information it is suggested reference is made to the National Planning Policy Framework (March 2012), Sustainable drainage systems: Written statement - HCWS161 (December 2014) and the Planning Practice Guidance webpage.</p> <p>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.</p> <p>Risk of flooding from surface water map: https://flood-warning-information.service.gov.uk/long-term-flood-risk/map</p> <p>Flood map for planning (rivers and sea): https://flood-map-for-planning.service.gov.uk/</p> <p>Planning</p>
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			<p>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.</p> <p>North Kilworth Adopted Plan (Leicestershirecommunities.co.uk) Great Glen Adopted Plan (Leicestershirecommunities.co.uk)</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.</p> <p>Although neighbourhood plans cannot include policies that cover minerals and waste development, it may be the case that your neighbourhood contains an existing or planned minerals or waste site. The County Council can provide information on these operations or any future development planned for your neighbourhood.</p> <p>You should also be aware of Minerals and Waste Safeguarding Areas, contained within the adopted Minerals and Waste Local Plan (Leicestershire.gov.uk). 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> <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.</p> <p>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>
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			<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 Specific Comments</p> <ul style="list-style-type: none"> • The Prime Minister has recently stated new cars and vans powered wholly by petrol and diesel will not be sold in the UK from 2030. The planning group should be mindful of this revised date. <p>General Comments</p> <p>With regard to the environment and in line with Government 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> <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</p>
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			<p>promoting healthier communities by providing greater opportunities for recreation and mental and physical health benefits; meeting the challenges of climate change and flood risk; increasing biodiversity and conserving and enhancing the natural environment. Looking at the existing provision of GI networks within a community can influence the plan for creating & enhancing new networks and this assessment can then be used to inform CIL (Community Infrastructure Levy) schedules, enabling communities to potentially benefit from this source of funding.</p> <p>Neighbourhood Plan groups have the opportunity to plan GI networks at a local scale to maximise benefits for their community and in doing so they should ensure that their Neighbourhood Plan is reflective of the relevant Local Authority Green Infrastructure strategy. Through the Neighbourhood Plan and discussions with the Local Authority Planning teams and potential Developers communities are well placed to influence the delivery of local scale GI networks.</p> <p>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. 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 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>
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		<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 has now left the EU, Neighbourhood Planning groups should remain mindful of any future changes which may occur to the above guidance.</p> <p>Impact of Development on Household Waste Recycling Centres (HWRC)</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 (2019) 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> <p>Fibre Broadband</p>
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			<p>High speed broadband is critical for businesses and for access to services, many of which are now online by default. Having a fast broadband connection is no longer merely desirable but is an essential requirement in ordinary daily life.</p> <p>All new developments (including community facilities) should have access to ultrafast broadband (of at least 100Mbps) and allow mechanisms for securing a full fibre broadband provision for each premise and business from at least one network operator, provided on an open access basis. Such provider must deploy a Fibre to the Premise (FTTP) access network structure in which optical fibre runs from a local exchange to each premise.</p> <p>Developers should take active steps to incorporate adequate broadband provision at the pre-planning phase and should engage with telecoms providers to ensure fibre 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>The Council supports a 'dig once' approach for the deployment of communications infrastructure and a build which is sympathetic to the character and appearance of the surrounding area. The Council encourages telecommunications build which does not significantly impact on the appearance of any building or space on which equipment is located and which minimises street clutter.</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 2020-2024 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:</p> <p>https://www.leicestershire.gov.uk/have-your-say/previous-consultations/equality-strategy-2020-24-consultation</p> <p>Accessible Documents</p> <p>In today's working environment more and more information is being produced digitally. When producing information which is aimed at or to be viewed by the public, it is important to make that information as accessible as possible. At least 1 in 5 people in the UK have a long-term illness, impairment or disability. Many more have a temporary disability.</p> <p>Accessibility means more than putting things online. It means making your content and design clear and simple enough so that most people can use it without needing to adapt it, while supporting those who do need to adapt things.</p> <p>For example, someone with impaired vision might use a screen reader (software that lets a user navigate a website and 'read out' the content), braille display or screen magnifier. Or someone with motor difficulties might use a special mouse, speech recognition software or on-screen keyboard emulator.</p>
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			Public sector organisations have a legal requirement to make sure that all information which appears on their websites is accessible. As Neighbourhood Plans have to be published on Local Planning Authority websites, they too have to comply with government regulations for accessibility. Guidance for creating accessible Word and PDF documents can be found on the Leicestershire Communities website under the heading 'Creating Accessible Documents':- https://www.leicestershirecommunities.org.uk/sr/
8	Resident	<p>Page 31 figure 7 of LNP</p> <p>Page 18, Policy H1 and page 21 paragraph 2 of LNP Parishioners Complaints Feb 21 in supporting documents to LNP</p>	<p>I refer to sites 001 and 327 on the map. The advisory committee was tasked to write to the owners of suitable plots for development. Questionnaires were hand delivered to 15 landowners resulting in seven sites being put forward. The authors of the plan failed to contact the owners of sites 001 and 327, despite the potential of the sites being identified on this map by the committee. It is well known in the village that the sites have belonged to my family for many years. The plots are on the HDC register of available sites. Site 001 is registered at the Land Registry in the names of myself and Michael Drake, a solicitor in Newmarket, since we are trustees of the land for my grandchildren. Similarly plot 327 is also registered at the land registry, in the name of my daughter Sally Swann.</p> <p>None of us have received any letter from the committee giving us the opportunity to put forward the sites.</p> <p>I consider the serious omission of the LNP to include these sites in their considerations weaken its ability to contribute to the achievement of sustainable development as per the regulations.</p> <p>The proposed adopted site is back land development, not favoured by Leire residents accessed by a narrow road between two houses in St. Peters Close. Many residents are extremely upset. The LNP Statement of Basic Conditions, section 5, states that considerable care has been taken to avoid any unintentional negative impacts on particular groups. I believe policy H1 does have a negative impact on the residents of St Peters Close and suggest that is not compatible with EU and Human Rights obligations.</p>

		<p>Page 31, figure 7 of LNP Appendix 7 of LNP</p>	<p>The LNP is inaccurate in its designation of both site 001 and site 327, which my family also own. In the inventory of sites of Natural Environmental Significance, the principle reason given for awarding site 001, a high environmental score is the hedge on the eastern boundary.</p>
		LNP	<p>The hedge does not form part of site 001, It is owned by the proprietor of the piece of adjoining land through which the plan runs.</p> <p>The remaining reasons for blighting the land are fanciful. The bulk of the land is flat and any evidence of ridge and furrow is very faint indeed.</p>
		<p>Page 31, Figure 7 of LNP 7 of LNP</p>	<p>The second error is in regard to a potential windfall site 327 in Stemborough Lane, The entire wording to justify this plot receiving a high environmental score clearly relates solely to the adjoining property known as Homeleigh</p> <p>The assumption has been made that site 327 is part of and owned by the proprietor of Homeleigh which it is not and never has been.</p> <p>Quite apart from the lack of consultation, it must be wrong that errors of this kind which serve to blight the development of the village by ignoring the potential of these two sites should persist uncorrected. I would therefore request a modification to put this right.</p>
		<p>Page 21 Policy 4 of LNP Page 22 figure 3 of LNP</p>	<p>A final objection is the arbitrary change to the limits of village development which serves to exclude these two plots.</p> <p>The National Guidance issued by the Secretary of state requires that new development should not be built in isolation. I believe the limit of existing housing is Kimberly House on Frolesworth Road and Homeleigh in Stemborough Lane. Policy H4 proposes that the limits of development fall short of these properties. The local Plan has been removed limits to development in favour of criteria based policies and yet the LNP is proposing highly restrictive village boundaries.</p> <p>No explanation has ever been given for this unjustifiable alteration except to say that it was requested by some residents. One would ask how many by whom?</p>

		Page 20 of LNP	<p>It is a little concerning that the boundaries have been drawn to just exclude site 001 In Frolesworth Road, and in Stemborough Lane the boundary has been reduced on the north side to exclude Stemborough Lane Farm. The adjoining site 327 and Homeleigh, but extended unequally into isolation on the opposite south side of the land.</p> <p>In conclusion, I sincerely believe that modifications I am requesting substantially change the nature of the plan and rectify manifest errors. In addition they would assist the LNP in better addressing one of the basic requirements, namely 'to contribute to the achievement of sustainable development' which I suggest it does not fully do in its current form.</p>
9	Resident	<p>consultation statements pages 1-8</p> <p>Consultation statements pages 1-8</p> <p>Leire NP pages 18-19 Policy H1</p>	<p>There has been a complete lack of consultation with local residents. In particular those residents most affected by the provision H1. Residents affected have been misled and ignored. Despite a promise of an open meeting following representations the Parish council submitted the Leire NP without informing parisheners or holding the agreed meeting. The number of residents involved in the process has been minimal.</p> <p>In all the open meetings and exhibitions claimed by the draft document there was never any discussions about the particular development sites being offered and being considered.</p> <p>At the October 2019 Parish council meeting many residents attended and listened to a presentation by Andrew Granger to build five houses on the land behind St Peter's Close with access from a small private drive off St Peter's Close. The Parish Council in response stated publicly that Leire needed no extra houses to comply with HDC requirements and that the site was poorly sited with an inadequate access, off a congested small close. Despite this page 18 of the Leire NP includes the site for five residential units. This complete change of direction was not made clear to residents until the final</p>

		<p>Leire NP pages 18-19</p> <p>Consultation statement pages 1-4</p> <p>Consultation statement pages 1-4</p>	<p>consultation period in July 2020. All residents of St Peter's Close have objected and made valid representations but all have been to no effect. Comments such as "noted" on documents submitted to HDC is unacceptable.</p> <p>St Peter's Close is a small residential Close and is used by the Public House opposite, and Church as an overflow Car Park. Access is inadequate as it is not wide enough for emergency vehicles, Lorries or waste collection vehicles. It also runs directly by a neighbours house which is unacceptable for a number of reasons. Leire PC have never explained why they have ignored these comments and why they are so determined to include the land in the plan under policy H1. No impact assessment has been undertaken in respect of increased vehicles or affect on the local environment. Aleady this year a vehicle crashed into a wall as a result of parked cars and this month (April) the Parish Council asked all residents on Main Street, if possible to park off the street. Why therefore do they wish to exasperate the current position?</p> <p>In this statement there are claims that information was readily available and accessible to everyone and to make sure that consultation feedback was available asap after events. No minutes of the Leire NP advisory group were published until July 2020' well into the consultation period. They did not appear on the Parish Council website until queried by residents. It took several emails to the clerk before they eventually appeared on the website. Once on the website Leire PC made no attempt to inform villagers. There are no minutes for any of the Theme groups, in spite of the Leire NP advisory groups's minutes showing that they were often requested by the chair at their meetings.</p> <p>The only open meeting where the proposed develoment could have been presented and discussed was scheduled for April/May 2020 and was cancelled. There have therefore been no oppourtunities for comments and discussions with the wider community outside the handful of people who attended the Leire NP action groups meetings which ceased in January 2020. Afer pressure from affected residents the Parish Council agreed to hold an open meeting in January 2021. However once more there underhand actions denied residents this opportunity as they submitted the plan in December without</p>
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		Consultation Statement pages 3-7	<p>informing residents. There has been a complete lack of transparency, missing documents, lack of engagement and incorrect claims.</p> <p>Only landowners have been able to review the RAG scores in the SSA (App5 in the NP). The minutes for the Leire NPAC meeting in Nov 19 confirmed that the RAG scores of the potential housing sites were to be sent to the landowners to review. However Leire residents have not been able to see an accompanying map of the sites or breakdown of the RAG scores and the outcome of this review has not been made public. In April this year another landowner heard of the Leire NP and approached a resident in St Peter's Close to find out more.</p>
10	Resident	Policy H1	As set out in our response to the Regulation 14 consultation we maintain our objection on the grounds that the allocation, including the necessary highway improvement works, would have a significant impact on the character of the Leire Conservation Area. If, despite the objections regarding the site, it were to remain as an allocation then significant amendments need to be made to the policy and the supporting text. These amendments should set out the site specific context and constraints and guide development in such a way so as to ensure the it respects and addresses these site specific issues. These have helpfully been identified on page 75 of the Consultation Statement by HDC Development Management.
11	Resident	<p>Consultation Statement Pages 1 - 8</p> <p>Consultation Statement Pages 1 - 8</p>	<p>There has been a distinct lack of consultation with local residents regarding the Leire Neighbourhood Plan, particularly those most affected by the provision H1. Despite continued correspondence with the parish council local residents concerns have not been addressed.</p> <p>In all the Open Meetings and exhibitions claimed by the Draft Document there was NEVER any discussions or declarations about the particular development sites being offered and being considered.</p>


		<p>Leire Neighbourhood Plan - pages 18-19 Policy H1</p>	<p>Over 2 years ago the owner of 'Orchard Cottage' made a private arrangement with the owners of 'The Cottage' to demolish and move a wall in order to try to widen the access. in to the orchard field - this was clearly an attempt to facilitate entrance in to the field for a future housing development. This action should have required planning permission and should have been seen as part of this wider development. No planning permission was sought and to this day the movement of the boundary has not been notified to the Land Registry.</p>
		<p>Leire Neighbourhood Plan - pages 18-19 Policy H1 and Consultation Statement Pages 1 - 8</p>	<p>In October 2019, the local residents heard, by rumour that a developer (Andrew granger - agents of the current land owners) wished to address the parish council in person at one of their meetings. Many residents from St Peters Close and Airedale Close attended, including myself. At that meeting the Parish Council listened to the proposals and in response stated publicly that Leire needed NO extra housing to comply with Harborough District Council's requirements, and that this development was poorly sited with an inadequate access off of an existing congested road.</p> <p>The residents present at the meeting saw this as the parish council dismissing the proposed development at the outset.</p> <p>It was therefore with amazement that we learnt that policy H1 in the draft Leire Neighbourhood Plan was exactly this same development. This was not revealed until the consultation period of July 2020 but had apparently been adopted by the Leire Neighbourhood Plan Advisory Committee just weeks after the October meeting. Knowing the concern of the villagers affected, the Council made NO attempt whatsoever to consult or inform them of this complete reversal. What prompted the Parish council to make such an apparent u-turn so soon after its initial rejection as a proposed housing development?</p>

		<p>Consultation Statement Pages 1 and 4.</p> <p>Consultation Statement Pages 1 and 4.</p> <p>Consultation Statement Pages 1 and 4.</p>	<p>We include the final plan adopted by the Council and that presented to the October 2019 Parish Council meeting. In the correspondence with the Council over this, they have made the extraordinary claim that 'they presented a scheme that was larger and of a different content to the one eventually included in the plan'. We have questioned this and the Council have declined to comment.</p> <p>Minutes and Meetings</p> <p>In the 'Consultation Statement' there are claims that information was 'readily available and accessible to everyone' (page 1) and to make sure that 'consultation feedback was available as soon as possible after events'.</p> <p>No Minutes of the Leire Neighbourhood Plan Advisory Committee were published until July 2020, well into the Consultation Period. They did not appear on the Parish Council website until we queried where they were. It took several emails to the Clerk to the Council before they eventually published on the Parish Council website.</p> <p>There are NO MINUTES for any of the Theme Groups, in spite of the Leire Neighbourhood Plan Advisory Committee's minutes showing that they were often requested by the Chair at their meetings.</p> <p>The only Open Meeting with parishioners where the proposed development could have been presented and discussed was scheduled for April/May 2020 and was cancelled due to COVID Pandemic. There were therefore no opportunities for comments and discussion with the wider community outside the handful of people who attended the Leire Neighbourhood Plan Action Committee's meetings (which ceased in January 2020).</p> <p>The Neighbourhood Plan claims to have used the Executive Summary to help share the policies within the Community, yet the Executive Summary was not published on the Parish Council website until October 2020, well after the Regulation 14 consultation period in July /August 2020.</p>
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		Neighbourhood Plan Page 14	
		Consultation Statement Pages 1 – 116	<p>The overwhelming views of parishioner respondents during the Consultation Period were that policy H1 was not required and was deeply flawed. This was totally overlooked by the Leire Neighbourhood Plan Advisory Committee and nothing was altered from the original draft. So this process could only be described as ‘publishing’ the draft, with no element of consultation whatsoever.</p>
		Consultation Statement Generally plus Pages 75 – 79	<p>There have been no meetings since January 2020. The Regulation 14 consultation was in July - August 2020. The LNPAC - and the Theme Groups - have not met since January 2020 and November 2019 respectively. It is therefore not clear how the Regulation 14 responses were actually dealt with locally. Page 8 of the Consultation Statement explains that “the LNPAC was asked to consider the comments and possible amendments to the plan” but how was this done if the LNPAC has not met?</p> <p>Not only that, the Agents for the development were evidently shown the comments PRIOR to publishing and allowed to respond to them – a privilege denied to affected residents.</p> <p>From our point of view, it has not been demonstrated that this key process has been done in an open, transparent, consistent or objective way.</p>

		<p>Consultation Statement Pages 1 and 4.</p>	<p>Residents of St Peters Close and Airedale Close attended the Parish Council meeting of November 2020 when the Neighbourhood Plan was due to be discussed. 'The Council agreed that further discussion be delayed until the New Year to allow Councillors to inspect the proposed sites identified for possible development.....This plan was agreed by all, with the exception of Mr. Pool'.(See Minutes of the meeting from Parish website).</p> <p>This course of action was completely overturned in December 2020 - the next month. As a result of a private meeting of Councillors, the plan was to be submitted to Harborough District Council without further delay or discussion! No residents were informed of this decision prior to the December meeting, in spite of the obvious interest.</p> <p>Councillors have been asked several times to explain this unreasonable behaviour and have apparently sought to use the Government's White Paper on Housing Policy to justify their actions. Yet this policy was shelved in December 2020, in plenty of time for the Parish Council to revert to their publicly agreed intentions, prior to the submission of the draft plan in January 2021. They did not do so.</p>
		<p>Neighbourhood Plan pages 5-8</p>	<p>The Harborough Local Plan does not view Leire as a sustainable location for housing. Leire is at the bottom of the hierarchy and is in the classification of 'Rural Villages and other Settlements'. Paragraph 3.1.14 of the Local Plan confirms that Leire is not considered a sustainable location for housing development.</p> <p>There is therefore no justification for the LNPAC's decision to 'future proof' the Leire Neighbourhood Plan by adopting policy H1.</p> <p>We strongly disagree with the assertion of the Neighbourhood Plan (page 8) that its aim and policies are centred on the achievement of sustainable development. A Greenfield Residential Allocation in Leire undermines the overarching direction and wider vision of the Local Plan in respect of housing supply. That a village centre greenfield development is being considered at all, when this was voted as the least acceptable form of development by village residents, is beyond comprehension.</p>

		<p>Statement of Basic Conditions (Policy T1 Traffic Management page 11)</p> <p>Consultation Statement Pages 3 – 7</p> <p>Neighbourhood Plan page 18</p>	<p>The proposed access road, off St Peter's Close, is grossly unsuitable. This end of St Peters Close is commonly used as parking for the Queens Arms, The Church and by walkers, as well as by residents. There seems to have been no consideration to planning an access from Main Street itself, with the plan clearly proposing to squeeze another house in to the zone that could have been used as an access off of Main St (a move clearly designed to increase development profit at the expense of local residents concerns).</p> <p>I can only imagine the state of this end of St Peters Close if development were allowed to go ahead, with lorries and eventual removals vans attempting to navigate the narrow hair-pin bends proposed to access the development site. I would feel most sorry for the residents of no. 2 St Peters Close, who will be lucky to escape this proposal without actual physical damage to their property.</p> <p>No impact assessment has been undertaken in respect of increased traffic or effect on the local environment.</p> <p>Only landowners have been able to review the RAG scores in the SSA (Appendix 5 in the NP). The minutes for the Leire NPAC meeting in Nov 19 confirmed that the RAG scores of the potential housing sites were to be sent to the landowners to review. However Leire residents have not been able to see an accompanying map of the sites or breakdown of the RAG scores and the outcome of this review has not been made public.</p> <p>Under 'Residential Allocation' the Parish Council claim to have issued 'Call For Sites Letters' to landowners. These were apparently hand delivered to over 15 landowners. No detail is given as to how these landowners were selected and indeed as to how comprehensive this list was of all relevant landowners within the designated area as defined in Fig. 1 , page 5 of the NP. Not all Leire land owners were invited to offer land.</p>
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12	Resident	Page 31 figure 7 of LNP	<p>I refer to sites 001 and 327 on the map.</p> <p>The advisory committee was tasked to write to the owners of suitable plots for development. Questionnaires were hand delivered to 15 landowners, resulting in seven sites being put forward. The authors of the plan failed to contact the owners of sites 001 and 327, despite the potential of the sites being identified on this map by the committee. It is well known in the village that the sites have belonged to my family for many years. The plots are on the HDC register of available sites. Site 001 is registered at the Land Registry in the names of myself and Michael Drake, a solicitor in Newmarket, since we are trustees of the land for my Grandchildren. Similarly plot 327 is also registered at the Land Registry, in the name of my daughter Sally Swann.</p> <p>None of us have received any letter from the committee giving us the opportunity to put forward the sites.</p>

		<p>Page 18, policy H1 and page 21 paragraph 2 of LNP Parishioners Complaints Feb 21 in supporting documents to LNP</p> <p>Page 31, figure 7 of LNP Appendix 7 of LNP</p>	<p>I consider the serious omission of the LNP to include these sites in their considerations weakens its ability to 'contribute to the achievement of sustainable development' as per the regulations.</p> <p>The proposed adopted site is backland development, not favoured by Leire residents, accessed by a narrow road between two houses in St. Peters Close. Many residents are extremely upset. The LNP Statement of Basic Conditions, section 5, states that considerable care has been taken to avoid any 'unintentional negative impacts on particular groups'. I believe policy H1 does have a negative impact on the residents of St. Peters Close and suggest this is not compatible with EU and Human Rights obligations.</p> <p>The LNP is inaccurate in its designation of both site 001 and site 327, which my family also own. In the inventory of sites of Natural Environmental Significance, the principal reason given for awarding site 001 a high environmental score is the hedge on the eastern boundary. This hedge does not form part of site 001. It is owned by the proprietor of the piece of adjoining land through which the footpath runs.</p>
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13	Andrew Granger Ltd	<p>1. Introduction</p> <p>1.1. Andrew Granger & Co. Ltd specialises in the promotion of strategic land for residential development and commercial uses. As a company, we are heavily involved in the promotion of Client's land through various Neighbourhood Plans, and we also have vast experience in contributing to the Local Plan preparation process throughout the country.</p> <p>1.2. On behalf of the Hemsley Family ("the Landowner"), we are seeking to work with Harborough District Council and Leire Neighbourhood Plan Group, in promoting Land rear of Orchard Cottage, Main Street, Leire ("the Site") as a residential allocation for a small-scale residential development of five dwellings within the Leire Neighbourhood Plan.</p> <p>1.3. This document provides a written submission to the Leire Neighbourhood Plan: Pre-Examination (Regulation 16) Consultation and is framed in the context of the obligation for the Neighbourhood Plan to meet the "basic conditions" and other legal requirements as established by Paragraph 37 of the National Planning Policy Framework [NPPF] ("the Framework") (Adopted February 2019). The aforementioned basic conditions and legal requirements are set out in Paragraph 8 of Schedule 4B of the Town and Country Planning Act 1990 (as amended), and require the Independent Examiner to consider the following:</p>

		<ul style="list-style-type: none"> • Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the Neighbourhood Plan. • Having special regard to the desirability of preserving any listed building or its setting, or any features of special architectural or historic interest that it possesses, it is appropriate to make the Neighbourhood Plan. • Having regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the Neighbourhood Plan. • The making of the Neighbourhood Plan contributes to the achievement of sustainable development. • The making of the Neighbourhood Plan is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area). <ul style="list-style-type: none"> • The making of the Neighbourhood Plan does not breach, and is otherwise compatible with EU obligations; and • Prescribed conditions are met in relation to the Neighbourhood Plan and prescribed matters have been complied with in connection with the proposal for the Neighbourhood Plan. <p>2. Planning Policy Context</p> <p>2.1. The adopted development plan for Harborough District currently comprises of the following:</p> <ul style="list-style-type: none"> • Harborough Local Plan 2011-2031 (adopted April 2019) <p>2.2. Objective 1: Housing</p> <p>of the adopted Local Plan states <i>‘Meet the housing requirements of the District in full by providing a range of market and affordable housing types, tenures and sizes in appropriate and sustainable locations to meet local needs. Recognise the specific accommodation requirements of the young and the elderly populations, including starter homes to help first time buyers, shared ownership and rented housing to help those who cannot afford to buy, and specialist housing such as sheltered and extra care accommodation.’</i></p>
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		<p>2.3. Objective 14: Neighbourhood Planning of the adopted Local Plan states <i>‘Encourage and support communities to make decisions at the local level through the preparation of neighbourhood plans and facilitate this process by setting out a clear strategic framework’</i></p> <p>2.4. Paragraph (f) of SS1 The Spatial Strategy states <i>‘Other villages, rural settlements and the countryside where development will be strictly controlled.’</i></p> <p>2.5. GD3 Development in the Countryside states <i>‘Outside Market Harborough, Key Centres, the Principal Urban Area (PUA), Rural Centres and Selected Rural Villages, and land adjoining them, but excluding Green Wedges, development will be permitted where it is required for the following purposes: f. rural housing in accordance with Policy GD4 New Housing in the Countryside.’</i></p> <p>2.6. GD4 New Housing in the Countryside states <i>‘Outside Market Harborough, Key Centres, the Principal Urban Area, Rural Centres and Selected Rural Villages, but excluding Green Wedge, new residential development will only be permitted either where it is in accordance with Policy GD2 or where it is for: a. Housing on small sites of no more than 4 dwellings which are within or physically and visually connected to settlements and which meet a local need for housing of a particular type, including small dwellings for the elderly and starter homes, providing this has been evidenced through a rural housing needs survey or a neighbourhood plan.’</i></p> <p>2.7. H2 Affordable Housing states <i>‘1. 40% affordable housing will be required on housing sites: a. of more than 10 dwellings; or b. with a combined gross floorspace of more than 1,000 square metres. The policy goes on to state ‘3. Where on-site provision is demonstrated to be impractical, off-site commuted sums of an equivalent value will be made in lieu of on-site provision.’</i></p> <p>3. Site & Development Potential</p> <p>3.1. The proposed development site measures approximately 0.34 hectares (0.85 acres) and is located to the east of Leire, within the built-up area of the village, as identified outlined in red in Figure 1 below. The site is within single ownership, owned by one family, who are</p>
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committed to bringing forward the site in a sympathetic manner that benefits the village and meets an identified housing need.

3.2. Leire has a limited number of local services and facilities including a public house, restaurant, Village Hall, recreation facilities and a Church. The village is located in close proximity to further services and employment opportunities in Broughton Astley (approximately 2.5 miles), Lutterworth (approximately 4.5 miles) and Dunton Bassett (approximately 1.7 miles).

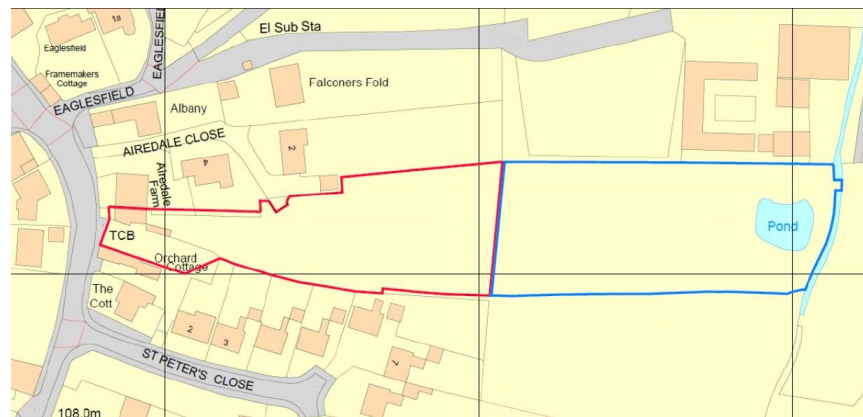


Figure 1: Site Location Plan

3.3. The proposed development is well placed with regards to its proximity to the local services within Leire. It is located to the rear of Orchard Cottage, Main Street, with access onto Main Street or via St Peter's Close and is a short walk from the Crab & Cow and the Queens Arms. The site is currently vacant, with no existing or previous use required to be relocated as part of the development.

3.4. The site has clearly defined boundaries, it is bound to the north, south and west by existing residential development and further open land to the east. The site has an enclosed feel and development of the site would not impact on views in and out of the village. Existing mature trees and hedgerows around the site boundaries would be retained as part of the development scheme with enhanced planting proposed.

3.5. With reference to Figure 2 below, the Site is located within Flood Zone 1 of the Flood Map for Planning and is, therefore, assessed as having low risk of flooding (less than 1 in 1000 annual probability of river flooding). Consequently, the Site is not considered to present a significant, overall risk of flooding.

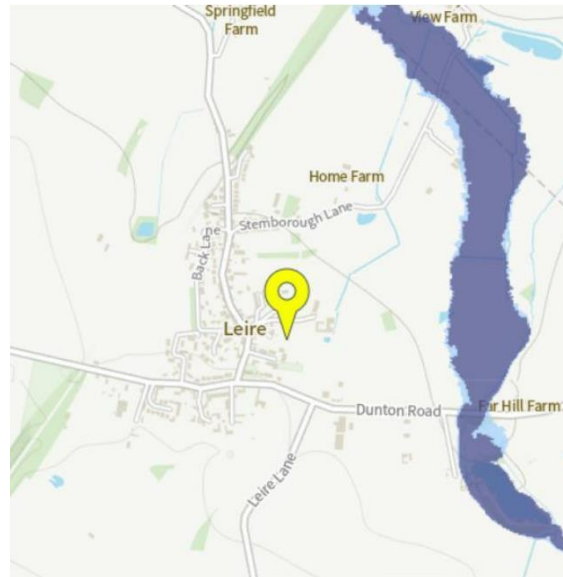


Figure 2: Surface Water Flood Risk (Approximate site location identified by the yellow marker) – Source: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>


3.6. The Landowner is seeking to deliver a high quality and well-designed residential development of five dwellings, complying with the identified need within the draft Neighbourhood Plan, which would be sympathetic to the existing built form of the village and reflecting the rural context. The development will deliver a mix of two, three and four bedroom properties, including bungalows. This will assist in meeting the identified housing need for the Parish.

3.7. The site will be accessed via St Peter's Close and an Access Drawing, prepared by WYG, has been submitted previously to the Leire Neighbourhood Plan Group as part of the Regulation 14 consultation. For completeness, the drawing can be read at **Appendix 1**. The Access Drawing demonstrates that a safe and suitable access can be achieved. The development will be served by a shared surface access, with a minimum width of 4.75m for the first 5m behind the highway, in accordance with Leicestershire County Council's Highways Design Guide. The access width will enable simultaneous two-way vehicle movement without vehicles required to wait on the highway. Suitable visibility splays from the access are achievable based

			<p>on the likely vehicle speeds along St Peter's Close. Suitable turning areas will be provided within the site to ensure vehicles can enter and egress from the site within a forward gear, as to not impact upon highway safety.</p> <p>3.8. Furthermore, as part of the proposed development layout, it was agreed with the Leire Neighbourhood Plan Group that a pedestrian footpath linking the site with Main Street would be provided.</p> <p>3.9. Consequently, we consider that the Site represents an appropriate and deliverable development opportunity.</p> <p>4. Comments on the Leire Neighbourhood Plan: Pre-Examination Consultation Document</p> <p>4.1. On behalf of our Landowner Client, we wish to make the following observations on the Leire Neighbourhood Plan: Pre-Examination (Regulation 16) Consultation document. These are in addition to previous submissions and also previous responses we have provided to the Neighbourhood Plan Group on matters and issues raised by consultees, which we believe will be provided to the Examiner.</p> <p>4.2. In respect of Policy H1: Residential site allocation, we support the allocation of Land rear of Orchard Cottage, Main Street, accessed from St Peter's Close for five residential dwellings. We believe this approach to be appropriate and complies with the aims of the National Planning Policy Framework (NPPF) to plan positively in the context of the delivery of new homes to meet an identified need. The allocation of a residential development site within the Neighbourhood Plan complies with Policy GD4 New Housing in the Countryside in the adopted Harborough Local Plan. The site will deliver new homes to meet an identified need evidenced through a neighbourhood plan.</p> <p>4.3. The allocated site, identified in the Neighbourhood Plan, in our view is the conclusion of comprehensive and independent assessment of all potential development sites in the village, which was informed by submissions and evidence presented to the Neighbourhood Plan Group. We consider that Land rear of Orchard Cottage, Main Street is appropriate for development and will bring significant benefit to the village in meeting the identified housing need and delivering the desired housing mix. In allocating a site for development and planning positively through the Neighbourhood Plan, the village will be able to resist speculative and unwarranted planning applications in the future.</p> <p>4.4. We confirm the site is available and deliverable. To demonstrate, an Illustrative Layout (Appendix 2) has been submitted to the Leire Neighbourhood Plan Group, which reflects the objectives of the policy to deliver a mix of two, three and four bedroom properties, including bungalows. The Illustrative Layout demonstrates that the proposed development</p>
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			<p>can be accommodated on the site and delivered in a sympathetic manner to protect the residential amenity of existing properties. Bungalows have been carefully positioned to minimise overlooking issues.</p> <p>4.5. In respect of housing needs specifically, the PPG identifies that communities preparing a Neighbourhood Plan should take account of the latest and up-to-date evidence of housing need (Ref: Section 41 Paragraph 040). Furthermore, the PPG recognises that the question of whether or not a proposed Neighbourhood Plan has taken account of the latest housing needs evidence is considered to be relevant in the assessment of whether the Plan's housing land supply contributes to the achievement of sustainable development and, therefore, accords with the basic conditions.</p> <p>4.6. We consider that the Neighbourhood Plan reflects an up-to-date position in respect of housing need, however, the policy should contain sufficient flexibility should each property require additional rooms/space to allow/accommodate working from home in the interests of meeting the objectives of sustainable development.</p> <p>4.7. In respect of draft Policy H4: Limits to Development, we support the inclusion of our client's site and proposed allocation under Policy H1 within the Limits to Development. This ensures consistency across the policies and throughout the Neighbourhood Plan.</p> <p>4.8. Regarding part b) of Policy H1: Residential Site Allocation and Policy H3: Affordable Housing, the landowners have committed through discussions with and submissions to the Neighbourhood Plan Group to provide affordable homes, if viable, as part of the development. However, to ensure the Neighbourhood Plan is in general conformity with the Harborough Local Plans specifically Policy H2 Affordable Housing, we consider that there should be sufficient flexibility within the policy should the need be required to be delivered via an alternative means.</p> <p>4.9. Regarding the specific wording, it is suggested that the wording is expanded, particularly in respect of 'local connection'. It is very much the landowner's intention to provide starter homes or properties for people to downsize to, who have a local connection, to the village of Leire.</p>
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[illegible]

		<p>Appendix 2: Illustrative Layout</p> 
14	Sport England	<p>Thank you for consulting Sport England on the above neighbourhood plan. <u>Please note our concern with respect to the use of robust and up to evidence below.</u></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</p>

		<p>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. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</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. https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</p> <p>Sport England has worked with Harborough DC to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 96 and 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 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>In this regard Sport England is concerned that the plan does not appear to refer to the latest evidence available. If this is the case the study used are out of date and therefore the plan is not sound. Harborough DC have developed the;</p> <p>Open Spaces Strategy (2016 to 2021) Built Sports Facilities Strategy (including Village Halls and Community Hubs) 2020 Playing Pitch Strategy 2018</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</p>
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		<p>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-communities</p> <p>PPG Health and wellbeing section: https://www.gov.uk/guidance/health-and-wellbeing</p> <p>Sport England's Active Design Guidance: https://www.sportengland.org/activedesign</p> <p><i>(Please note: this response relates to Sport England's planning function only. It is not associated with our funding role or any grant application/award that may relate to the site.)</i></p> <p>If you need any further advice, please do not hesitate to contact Sport England using the contact details below.</p>
15	Highways England	<p>We welcome the opportunity to comment on the submission version of the Leire Neighbourhood Plan which covers the period 2020-2031. It is noted that the document provides a vision for the future of the area and sets out a number of key objectives and planning policies which will be used to help determine planning applications.</p> <p>Highways England has been appointed by the Secretary of State for Transport as a 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 Leire Parish Council area, our principal interest is in safeguarding the operation of M1 J20 which routes some 4</p>

		<p>miles south east, the A5 routeing 3 miles south-west and M69 routeing 4 miles south-west of the proposed Plan area.</p> <p>We understand that a Neighbourhood Plan is required to be in conformity with relevant national and District-wide planning policies. Accordingly, the Neighbourhood Plan for Leire Parish is required to be in conformity with the adopted Harborough Local Plan (2011-2031) and this is acknowledged within the document. We note that Leire is classified under 'Other Village or Rural Settlements' within the Harborough Local Plan. Such locations are "considered the least sustainable locations for growth and are covered by housing in the countryside policy. New housing will be limited to housing to meet an identified need (either through a housing needs survey or neighbourhood plan), housing to meet the needs of a rural worker, rural exception sites, isolated homes in the countryside in accordance with NPPF paragraph 79, and replacement dwellings." We understand that, in line with NPPF, Harborough District Council set the minimum housing target by 2031 for Leire, at zero.</p> <p>We note that, in order to future proof the Neighbourhood Plan, Policy H1 allocates five dwellings within the Parish, which Highways England consider to be minimal. The Neighbourhood Plan also identifies policies to support employment related development (Policy INF2), promote working from home (Policy INF4) and improvements to mobile and telecommunication (Policy INF4). Highways England acknowledge that such policies promote less commuting and are likely to have a positive knock-on effect on the SRN.</p> <p>We support the policies proposed in the Neighbourhood Plan and consider that the limited level of growth proposed is not expected to have any significant impacts on the operation of the SRN.</p> <p>Should any developments with the potential to impact on the SRN be proposed within the Parish in the future, we would expect these to be reviewed and where necessary Transport Statements/Assessments be prepared as part of the development management process, to enable their impacts to be appropriately assessed.</p> <p>We have no further comments to provide and trust the above is useful in the progression of the Leire Neighbourhood Plan.</p>
16	The Coal Authority	<p>Thank you for your email below regarding the Leire Neighbourhood Development Plan Consultation.</p> <p>The Coal Authority is only a statutory consultee for coalfield Local Authorities. As Harborough District Council is outside the coalfield, there is no requirement for you to consult us and / or notify us of any emerging neighbourhood plans</p>

17	Resident	<p>Consultation Statement Pages 1 - 8</p> <p>Leire Neighbourhood Plan - pages 18-19 Policy H1</p> <p>Leire Neighbourhood Plan - pages 18-19 Policy H1 and Consultation Statement Pages 1 - 8</p>	<p>There has been a comprehensive lack of consultation with local residents regarding the Leire Neighbourhood Plan, particularly those most affected by the provision H1. Parishioners most affected have been misled and excluded on several occasions in an attempt to promote the Leire Neighbourhood Plan Advisory Committee's preferred site for development.</p> <p>In all the Open Meetings and exhibitions claimed by the Draft Document there was NEVER any discussions or declarations about the particular development sites being offered and being considered.</p> <p>The area of land behind Orchard Cottage, bordered by St Peters Close and Airedale Close has long been a possible site for development. The father of the present owners had for many years, outline planning permission for a further dwelling approached from Airedale Close.</p> <p>Discussions have taken place with the present owner of Orchard Cottage regarding proposals for development and we have always made clear our complete objection to any attempt to use the drive to the side of our house as access for such a development.</p> <p>Over 2 years ago the owner of 'Orchard Cottage' made a private arrangement with the owners of 'The Cottage' to demolish and move a wall in order to try to widen the access. This action should have required planning permission and should have been seen as part of this wider development. No planning permission was sought and to this day the movement of the boundary has not been notified to the Land Registry.</p> <p>When, in October 2019, we heard a rumour of a presentation by Andrew Granger (agents for the owners of the land in question), to Leire Parish Council at their regular monthly meeting, many residents from St Peters Close and Airedale Close attended. At that meeting the Parish Council listened to the proposals and in response stated publicly that Leire needed NO extra housing to comply with Harborough District Council's requirements, and that this development was poorly sited with an inadequate access off an existing congested road.</p> <p>We took it from that response that there was no possible chance that this plan would be ever considered to be acceptable.</p> <p>It was therefore with amazement that we learnt that policy H1 in the draft Leire Neighbourhood Plan was exactly this same development. This was not revealed until the consultation period of July 2020 but had apparently been adopted by the Leire Neighbourhood Plan Advisory Committee just weeks after the October meeting. Knowing the concern of the villagers affected, the Council made NO attempt whatsoever to consult or inform them of this complete reversal.</p>
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		<p>Consultation Statement Pages 1 and 4.</p>	<p>We include the final plan adopted by the Council and that presented to the October 2019 Parish Council meeting. In the correspondence with the Council over this, they have made the extraordinary claim that 'they presented a scheme that was larger and of a different content to the one eventually included in the plan'. We have questioned this and the Council have declined to comment. See Fig. (a) attached.</p>
		<p>Consultation Statement Pages 1 and 4.</p>	<p>Minutes and Meetings</p> <p>In the 'Consultation Statement' there are claims that information was 'readily available and accessible to everyone' (page 1) and to make sure that 'consultation feedback was available as soon as possible after events'.</p> <p>No Minutes of the Leire Neighbourhood Plan Advisory Committee were published until July 2020, well into the Consultation Period. They did not appear on the Parish Council website until we queried where they were. It took several emails to the Clerk to the Council before they eventually published on the Parish Council website. See Fig.(c) attached.</p> <p>There are NO MINUTES for any of the Theme Groups, in spite of the Leire Neighbourhood Plan Advisory Committee's minutes showing that they were often requested by the Chair at their meetings.</p>
		<p>Consultation Statement Pages 1 and 4 and Neighbourhood Plan Page 14</p>	<p>The only Open Meeting with parishioners where the proposed development could have been presented and discussed was scheduled for April/May 2020 and was cancelled due to Coronavirus. There were therefore no opportunities for comments and discussion with the wider community outside the handful of people who attended the Leire Neighbourhood Plan Action Committee's meetings (which ceased in January 2020).</p> <p>The Neighbourhood Plan claims to have used the Executive Summary to help share the policies within the Community, yet the Executive Summary was not published on the Parish Council website until October 2020, well after the Regulation 14 consultation period in July /August 2020.</p>

		<p>Consultation Statement Pages 1 – 116</p>	<p>The overwhelming views of parishioner respondents during the Consultation Period were that policy H1 was not required and was deeply flawed. This was totally overlooked by the Leire Neighbourhood Plan Advisory Committee and nothing was altered from the original draft. So this process could only be described as 'publishing' the draft, with no element of consultation whatsoever.</p>
		<p>Consultation Statement Generally plus Pages 75 – 79</p>	<p>There have been no meetings since January 2020. The Regulation 14 consultation was in July - August 2020. The LNPAC - and the Theme Groups - have not met since January 2020 and November 2019 respectively. It is therefore not clear how the Regulation 14 responses were actually dealt with locally. Page 8 of the Consultation Statement explains that "the LNPAC was asked to consider the comments and possible amendments to the plan" but how was this done if the LNPAC has not met?</p> <p>Not only that, the Agents for the development were evidently shown the comments PRIOR to publishing and allowed to respond to them – a privilege denied to any other interested parties.</p> <p>From our point of view, it has not been demonstrated that this key process has been done in an open, transparent, consistent or objective way. Consequently, we feel that the evidence provided to support the choices made and the approach taken is not sufficiently robust.</p>
		<p>Consultation Statement Pages 1 and 4.</p>	<p>Residents of St Peters Close and Airedale Close attended the Parish Council meeting of November 2020 when the Neighbourhood Plan was due to be discussed. 'The Council agreed that further discussion be delayed until the New Year to allow Councillors to inspect the proposed sites identified for possible development.....This plan was agreed by all, with the exception of Mr. Pool'.(See Minutes of the meeting from Parish website).</p> <p>This course of action was completely overturned in December 2020 - the next month. As a result of a private meeting of Councillors, the plan was to be submitted to Harborough District Council without further delay or discussion. No residents were informed of this decision prior to the December meeting, in spite of the obvious interest.</p> <p>Councillors have been asked several times to explain this unreasonable behaviour and have apparently sought to use the Government's White Paper on Housing Policy to justify their actions. Yet this policy was shelved in December 2020, in plenty of time for the Parish Council to revert to their publicly agreed intentions, prior to the submission of the draft plan in January 2021. They did not do so.</p>



		Neighbourhood Plan pages 5-8	<p>The Harborough Local Plan does not view Leire as a sustainable location for housing. Leire is at the bottom of the hierarchy and is in the classification of 'Rural Villages and other Settlements'. Paragraph 3.1.14 of the Local Plan confirms that Leire is not considered a sustainable location for housing development.</p> <p>There is therefore no justification for the LNPAC's decision to 'future proof' the Leire Neighbourhood Plan by adopting policy H1.</p> <p>We strongly disagree with the assertion of the Neighbourhood Plan (page 8) that its aim and policies are centred on the achievement of sustainable development. A Greenfield Residential Allocation in Leire undermines the overarching direction and wider vision of the Local Plan in respect of housing supply.</p>
		Statement of Basic Conditions (Policy T1 Traffic Management page 11)	<p>The insertion of an additional very restricted access off St Peter's Close which is already heavily congested by residential parking and visitor parking (especially for the Pub, Church and rambling activities) can only be seen as increasing the impact of the transport system on the environment and individuals.</p> <p>No impact assessment has been undertaken in respect of increased traffic or effect on the local environment.</p> <p>By way of illustration we attach photographs of routine congestion experienced directly around the proposed access to the Policy H1 development. See Fig. (b) attached.</p>
		Consultation Statement Pages 3 – 7	<p>Only landowners have been able to review the RAG scores in the SSA (Appendix 5 in the NP). The minutes for the Leire NPAC meeting in Nov 19 confirmed that the RAG scores of the potential housing sites were to be sent to the landowners to review. However Leire residents have not been able to see an accompanying map of the sites or breakdown of the RAG scores and the outcome of this review has not been made public.</p>
		Neighbourhood Plan page 18	<p>Under 'Residential Allocation' the Parish Council claim to have issued 'Call For Sites Letters' to landowners. These were apparently hand delivered to over 15 landowners. No detail is given as to how these landowners were selected and indeed as to how comprehensive this list was of all relevant landowners within the designated area as defined in Fig. 1 , page 5 of the NP. We have evidence of at least one landowner who states that he was never approached regarding his land and that he</p>


			would have been very interested in making a proposal for development. This particular landowner no longer lives in the Parish so would never have received a hand delivered invitation.
		Neighbourhood Plan page 21	This states that 'consultation has highlighted a lack of support for tandem and backland development'. Yet the development proposed in Policy H1 is exactly a 'backland development'. The area in question includes land previously used as garden and does not adjoin the public highway.
		Neighbourhood Plan page 21	Policy H4 Methodology seeks to define the Limits to Development and states (Item 3) 'Non-residential land which relates more closely to the countryside such as agricultural, paddock, meadow, woodland and/or other green field use has been excluded'. This definition would certainly preclude the proposed development site, had it not already been made an exception (for unspecified reasons).
		Neighbourhood Plan	We believe there was, and still is, a widespread lack of understanding as to the purpose and consequences of the development of the Leire Neighbourhood Plan. In spite of the claimed 'open events' there has been very little community engagement. Meetings have been extremely poorly attended and we believe that the majority of villagers, unaffected by the Plan proposals, still have no knowledge of, or interest in, the Neighbourhood Plan. The complexities of the subject and the whole Neighbourhood Plan process, jargon and bureaucracy are a complete deterrent to the participation by all but those who are potentially gravely affected by the consequences. The majority of villages want no further development. This is shown over and over again by the Community Questionnaire responses and the Consultation Statement responses. There is no requirement to build, according to the Harborough District Council Local Plan and yet, here we are with a Parish Council endorsed development proposal for the centre of the village.

			 <p>Plan presented at Parish Council meeting</p>
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Figure (b)
Examples of typical parking situations in St Peter's Close at the entrance to the proposed development in Policy H1 of the Neighbourhood Plan.

			<div data-bbox="633 193 1344 593"></div> <div data-bbox="1350 193 2049 593"></div> <div data-bbox="627 590 882 627"><p>Email 29th July 2020</p></div> <div data-bbox="627 622 1680 850"><p>Dear Tim,</p><p>Please find attached a copy of the minutes you have requested.</p><p>Kind regards Ruth</p></div>
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			<p>Sent: Friday, 24 July, 2020 4:44pm To: clerk@leireparishcouncil.org.uk Subject: Neighbourhood Planning Committee</p> <p>Hi Ruth Did you receive my previous email regarding minutes for the NPC meetings subsequent to Jan 2019? Any luck with these? Regards Tim</p> <p>Sent from my iPad</p>  <p><u>Figure (c)</u> A copy of the email received on 29th July 2020 when the LNPAC minutes were first published.</p>
18	British Horse Society	Policy INF1 Pp48-49	The document acknowledges the popularity of horse riding in the village but the Policy makes no mention of equestrians, supporting access for cyclists and pedestrians only.

	policy INF2 p50	<p>Leire draft NP submission</p> <p>Horse riding is included in the Active Travel definition. Jesse Norman MP, Parliamentary Under – Secretary of State for Transport in a House of Commons debate on Road Safety, 5 November 2018 (1) stated: “We should be clear that the cycling and walking strategy may have that name but is absolutely targeted at vulnerable road users, including horse-riders.....Horse riders are vulnerable road users—there is no doubt about that, and there never has been—and they have been included in the work we are doing.”</p> <p>Since 2010, the British Horse Society has received reports of over 4,774 road incidents involving horses, 1080 horses have been injured, 395 horses have died, 44 humans have lost their lives and 1220 have been injured; protecting, improving and extending safe off-road provision will help to prevent these numbers from increasing in the future.</p> <p>As equestrians have access to only 22% of the recorded rights of way it is essential that these are protected and enhanced and that there is sufficient resource for this (in terms of a Public Rights of Way team at county level that can maintain and protect routes).</p> <p>The equine industry generates £4.7 billion annually nationally (BETA, 2019). Equestrian access is important to sustain equestrian activity and the wider employment and income generation associated with this. Equestrian tourism such as horse riding holidays or day events (pleasure rides, competitions, etc) rely on safe access to off-road routes to provide for these popular activities enjoyed by a diverse range of people (Dashper, 2020). Horse-riding is considered a nature-based tourism activity enabling people to be closer to nature and gain from the physical and mental health benefits provided (Sung et al, 2015; BHS, 2020)</p>
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	Harborough District Council	<p>Harborough District Council made comprehensive comments at Regulation 14 stage which have been used by the QB to influence the submission version plan.</p> <p>HDC make the further comments:</p> <p><u>Comments on Reg 16 Leire Neighbourhood Plan</u></p> <p>Page 15:</p> <p>1st para –it continues, by 2031, to thrive as a vibrant and distinctive Village, to continue to respect and reflect the views of its community.....</p> <p>Page 23:</p> <ul style="list-style-type: none"> • Policy refers to Leire Village Design Guide but Appendix 6 document is entitled Leire Housing Design Guide. What is the correct title? • Its title would imply that it only applies to housing development. Yet the supporting text on page 23 says '<i>its aim is to safeguard the distinctive character and rich heritage of Leire and to guide any new development in a way that ensures it is sympathetic.....</i>'. Needs to be clarified. <p>Design Guide:</p> <ul style="list-style-type: none"> • Design Code One – a design and access statement is submitted to the local planning authority (HDC) as part of the planning application process. It is not for the Parish Council to approve before construction can start on site. • Suggest referring to 'development proposals' rather than 'construction proposals' in the Design Guide. • There is no Design Code Four – jumps from three to five. <p>Page 34:</p> <p>Policy ENV 5: Refers to the 'sites listed' but there is no list in the policy.</p> <p>Listed Buildings – refers to Supporting Information, Document N but not on the PC's website.</p> <p>Page 37:</p> <p>Policy ENV 7 references Figure 10 but it should be Figure 12. The policy identifies 12 species-rich, ancient hedges as non-designated heritage assets – it isn't clear what this means in terms of policy approach.</p> <p>Page 45-46:</p> <p>Policy ENV 12 – refers incorrectly to NPPF 2019 paragraph 10.3 (means Local Plan)</p> <p>HDC make the following Regulation 14 comments again at Regulation 16 stage for the benefit of the Examiner</p> <p><i>We note the following constraints:</i></p> <ul style="list-style-type: none"> ~ <i>Airedale Farm is a Listed Building, with any outbuildings likely to be curtilage-listed</i> ~ <i>the westernmost part of the site is in Leire Conservation Area</i> ~ <i>the field has previously been notified to us as an area of Archaeological interest</i> ~ <i>the site is narrow, particularly towards its western end, with dwellings adjacent to the north and south</i> ~ <i>both Orchard Cottage and The Cottage are attractive buildings which make a positive contribution to the character of the Conservation Area and would be considered to be non-designated heritage assets</i> <p><i>We have the following comments:</i></p> <ul style="list-style-type: none"> ~ <i>the proposed access appears to have a width which accords with the Highway Design Guide, however from Google 'streetview' images, it appears that the access is bounded on both sides by a brick wall. This means that LCC Highways are likely to ask for an additional 0.5m width each side of the access, which may be impossible to achieve given third party ownership;</i> ~ <i>part of the site appears to contain both the garden of Orchard Cottage, and the outbuildings/building of Airedale Farm. The</i>
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			<p><i>access drive goes through the curtilage of Orchard Cottage which could lead to an unacceptable decrease in private amenity space for this property;</i></p> <p><i>~ the western part of the site is the most sensitive, given its constrained size, location within the Conservation Area, proximity to adjacent dwellings, and setting/fabric of the listed building. We are particularly concerned about the proposed bungalow just to the east of Airedale Farm, and that this may affect the setting of the Listed Building. We recommend that this is removed from the scheme;</i></p> <p><i>~ we are also concerned that part of Airedale Farm appears to be within the red line denoting the allocation, although a clause within the policy could address this (see below);</i></p> <p><i>~ officers believe that the site rises from the west to the east and it is important that any proposed dwellings are sympathetic to the area and street scene (not 'towering above' existing dwellings)</i></p> <p><i>Considering all the above, we find that 2-3 dwellings (of a modest size and designed to clearly meet a locally-identified need) are more likely to be acceptable than the proposed 5. Leire NP body may wish to consider including the following clauses to any policy, should they decide to allocate the site:</i></p> <p><i>~ have a high quality, bespoke design which demonstrates it meets a locally-identified need;</i></p> <p><i>~ respects the character and appearance of Leire Conservation Area and the setting of Airedale Farm;</i></p> <p><i>~ takes the opportunity for repair and sensitive re-use of Airedale Farm;</i></p> <p><i>~ provides appropriate archaeological investigation prior to submission of any planning application;</i></p> <p><i>~ has an access which accords with the Leicestershire Highway Design Guide;</i></p> <p><i>~ retains and suitably protects good quality and important trees;</i></p> <p><i>~ safeguards residential amenity</i></p>