

Gilmorton 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 |
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| 1 | Severn Trent Water - | <p>Policy G5: Ecology and Biodiversity</p> <p>Policy G8: Local Green Spaces</p> | <p>Severn Trent are supportive of the inclusion of the statement “New development will be expected to maintain and enhance existing ecological corridors and landscape features (such as watercourses, hedgerows and tree-lines) for biodiversity thus demonstrating overall net-gain.”, the protection of watercourses is vital for both the management of surface water and identify sustainable outfalls for new developments, and to the continuation of the water cycle needed to ensure that water is available for abstraction, processing and supplying to households.</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 G8 to support the delivery of flood alleviation projects where required within green spaces.</p> <p>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.</p> <p>Design and Sustainability</p> <p>Severn Trent note that there is no design policy within the Neighbourhood Plan, We would recommend that some aspects of design and Sustainability are highlighted at the Neighbourhood Plan stage, so that developers understand what standards they will be expected to meet. We are particularly keen that the following aspects are covered to minimise the impact of development on the sewerage and water supply networks.</p> <ol style="list-style-type: none"> 1. SuDS 2. Water Efficiency 3. Drainage Hierarchy 4. Protection of Watercourses |

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| | | <p>SuDS (Sustainable Drainage Systems)</p> <p>Severn Trent note that whilst 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 a design Policy, 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> <p>All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are put in place unless demonstrated to be inappropriate.</p> <p>All schemes for the inclusions of SuDS should demonstrate they have considered all four aspects of good SuDS design, Quantity, Quality, Amenity and Biodiversity, and the SuDS and development will fit into the existing landscape.</p> <p>The completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure that the SuDS are maintained in perpetuity.</p> <p>Where possible, all non-major development should look to incorporate these same SuDS principles into their designs. The supporting text for the policy should also include:</p> <p>Sustainable Drainage Systems (SuDS) should be designed in accordance with current industry best practice, The SuDS Manual, CIRIA (C753), to ensure that the systems deliver both the surface water quantity and the wider benefits, without significantly increasing costs. Good SuDS design can be key for creating a strong sense of place and pride in the community for where they live, work and visit, making the surface water management features as much a part of the development as the buildings and roads.</p> <p>We would also note that as the Lead Local Flood Authority (LLFA) are the statutory consultee for the planning process in relation to surface water management that they should also be consulted on any wording regarding SuDS.</p> <p>Water Efficiency</p> <p>Water efficient design and technology is important for ensuring the sustainability of the water supply system for the future, both supporting existing customers and future development. NPPF supports the delivery of sustainable development and the Humber River Basin Management Plan promotes the use of the tighter Water Efficiency Target within Building Regulations Part G. We would recommend that this detailed with a design Policy. This way developers are aware of what is expected of them from the outset of the design process. To aid with the implementation of the recommendation we have provided some example wording below:</p> <p>All development should demonstrate that they are water efficiency, where possible incorporating innovative water efficiency</p> |
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| | | <p>and water re-use measures, demonstrating that the estimated consumption of wholesome water per dwelling is calculated in accordance with the methodology in the water efficiency calculator, should not exceed 110 litres/person/day.</p> <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 a design Policy:</p> <p>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.</p> <p>Protection of watercourses</p> <p>Whilst it is appreciated that Policy G5 already covers part of this, the wording provided hwew focuses more not the flow of water rather than the ecological benefits detailed in Policy G5. Watercourses perform several vital roles from conveying water safely through the natural and built up environment, to providing access to water and habitats for wildlife. It is therefore important that these features are retained and protected from development such that the continuity of the natural water system is maintained. Watercourses also provide a sustainable outfall for surface water flows form developments as outlined in the Drainage Hierarchy. To aid with the implementation of this recommendation we have provided some example wording 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 are retained and that exceedance flows are not then directed away from the watercourse channel towards properties.</i></p> |
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| | | <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>Please keep us informed when your plans are further developed when we will be able to offer more detailed comments and advice.</p> <p>For your information we have set out some general guidelines that may be useful to you.</p> <p>Position Statement</p> <p>As a water company we have an obligation to provide water supplies and sewage treatment capacity for future development. It is important for us to work collaboratively with Local Planning Authorities to provide relevant assessments of the impacts of future developments. For outline proposals we are able to provide general comments. Once detailed developments and site specific locations are confirmed by local councils, we are able to provide more specific comments and modelling of the network if required. For most developments we do not foresee any particular issues. Where we consider there may be an issue we would discuss in further detail with the Local Planning Authority. We will complete any necessary improvements to provide additional capacity once we have sufficient confidence that a development will go ahead. We do this to avoid making investments on speculative developments to minimise customer bills.</p> <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</p> |
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| | | <p>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.</p> <p>To encourage developers to consider sustainable drainage, Severn Trent currently offer a 100% discount on the sewerage infrastructure charge if there is no surface water connection and a 75% discount if there is a surface water connection via a sustainable drainage system. More details can be found on our website</p> <p>https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/</p> <p>Water Quality Good quality river water and groundwater is vital for provision of good quality drinking water. We work closely with the Environment Agency and local farmers to ensure that water quality of supplies are not impacted by our or others operations. The Environment Agency’s Source Protection Zone (SPZ) and Safe Guarding Zone policy should provide guidance on development. Any proposals should take into account the principles of the Water Framework Directive and River Basin Management Plan for the Severn River basin unit as prepared by the Environment Agency.</p> <p>Water Supply When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts.</p> <p>We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.</p> <p>Water Efficiency Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person</p> |
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| | | <p>per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations.</p> <p>We recommend that in all cases you consider:</p> <ul style="list-style-type: none"> • • Single flush siphon toilet cistern and those with a flush volume of 4 litres. • • Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute. • • Hand wash basin taps with low flow rates of 4 litres per minute or less. • • Water butts for external use in properties with gardens. <p>To further encourage developers to act sustainably Severn Trent currently offer a 100% discount on the clean water infrastructure charge if properties are built so consumption per person is 110 litres per person per day or less. More details can be found on our website.</p> <p>https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/</p> <p>We would encourage you to impose the expectation on developers that properties are built to the optional requirement in Building Regulations of 110 litres of water per person per day.</p> <p>We would also encourage the use of rainwater harvesting on larger developments, either residential or commercial. This helps to reduce the demand on public supply, associated carbon impact of supply and also 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.</p> |
| 2 | Environment Agency – | <p>Thank you for giving the Environment Agency the opportunity to comment on the Gilmorton Neighbourhood Plan – examination version.</p> <p>We have reviewed those environmental constraints associated with the Plan and for which we have a remit (e.g. flood zone, main river). Since these elements are largely absent we have no formal comment to make on the submission.</p> |
| 3 | Highways | <p>We welcome the opportunity to comment on the submission version of the Gilmorton Neighbourhood Plan which</p> |

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| | England | <p>covers the period 2018-2031. 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 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 Gilmorton Parish Council area, our principal interest is in safeguarding the operation of M1 J20 which routes approximately 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 Gilmorton Parish is required to be in conformity with the adopted Harborough Local Plan (2011-2031) and this is acknowledged within the document.</p> <p>We note that Gilmorton is classified under ‘Selected Rural Villages’ within the Harborough Local Plan. Developments within such locations “should be primarily in the form of small-scale infill developments or limited extensions to help address economic, social or community objectives. This could include schemes to enable more social housing, small-scale market housing and development aimed at meeting the needs of local people.” The Neighbourhood Plan highlights that a total of 242 dwellings will be delivered (currently built or in the pipeline). No further housing growth is currently expected.</p> <p>Due to the limited level of growth currently being proposed across the Neighbourhood Plan area, we do not expect that there will be any severe impacts on the operation of the SRN. We have no further comments to provide and trust the above is useful in the progression of the Gilmorton Neighbourhood Plan.</p> |
| | Leicester Leicestershire and Rutland – Clinical Commissioning Group - | <p>LLR Clinical Commissioning Groups (CCGs) are supportive of the vision set out in your draft plan and would want to work collectively with you to understand in more detail how the local NHS can contribute to its delivery. Many of the themes identified in the plan will impact upon the wider determinants of health and as a result population health outcomes. We would therefore welcome working together to maximise the opportunity for health and wellbeing within the vision outlined in your plan.</p> <p>In particular, we would welcome:</p> <ul style="list-style-type: none"> • Actions to support the goal of sustainable development and community identity; maximising opportunities for residents to come together to create community cohesion and support each other, and protection of community facilities • Ensuring continued ease of access to the surrounding countryside and green spaces, and protection of natural habitats, |

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| | | <p>which will improve the physical and mental health of residents</p> <ul style="list-style-type: none"> • The actions to create and sustain local jobs and opportunities for new ways of working are welcome, as this is a large contributor to people's health and wellbeing. • That future development is designed in such a way to enhance physical and mental health and wellbeing. • Ensure that there are a range of options for travel within the area that enable residents to get to and from work and leisure easily. • Designs that support the reduction in carbon emissions, as this has a direct impact on some resident's health <p>As well as the above generic comments it is important to note that any increase in the number of new residents in any area will have a direct impact upon local NHS services whether that is primary, hospital or community care. Local primary care services are already under high demand and therefore any additional demand from housing developments will require developer contribution to mitigate this.</p> <p>Thank you for the opportunity to comment on your vision and I look forward to working together to make the most of the opportunity and mitigate any impacts from increases in population upon local NHS services.</p> |
| | Natural England- | <p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this neighbourhood plan.</p> |
| 4 | 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</p> |

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| | | <p>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> |
| 5 | Leicestershire County Council – | <p><u>Highways</u></p> <p><u>General Comments</u></p> <p>The County Council recognises that residents may have concerns about traffic conditions in their local area, which they feel may be exacerbated by increased traffic due to population, economic and development growth.</p> <p>Like very many local authorities, the County Council's budgets are under severe pressure. It must therefore prioritise where it focuses its reducing resources and increasingly limited funds. In practice, this means that the County Highway Authority (CHA), in general, prioritises its resources on measures that deliver the greatest benefit to Leicestershire's residents, businesses and road users in terms of road safety, network management and maintenance. Given this, it is likely that highway measures associated with any new development would need to be fully funded from third party funding, such as via Section 278 or 106 (S106) developer contributions. I should emphasise that the CHA is generally no longer in a position to accept any financial risk relating to/make good any possible shortfall in developer funding.</p> <p>To be eligible for S106 contributions proposals must fulfil various legal criteria. Measures must also directly mitigate the impact of the development e.g. they should ensure that the development does not make the existing highway conditions any worse if considered to have a severe residual impact. They cannot unfortunately be sought to address existing problems.</p> <p>Where potential S106 measures would require future maintenance, which would be paid for from the County Council's funds, the measures would also need to be assessed against the County Council's other priorities and as such may not be maintained by the County Council or will require maintenance funding to be 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</p> |

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| | | <p>improvements. Where there may be the 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>It should be noted that a new development should only mitigate its own residual impact; it cannot be expected for developers to mitigate existing concerns unless the existing concerns are significantly worsened. The LHA would normally expect development proposals to comply with the relevant national and local polices and guidance, both in terms of justification and of design.</p> <p>Improvements form part of outline application</p> <p><u>Flood Risk Management</u> The County Council are fully aware of flooding that has occurred within Leicestershire and its impact on residential properties resulting in concerns relating to new developments. LCC in our role as the Lead Local Flood Authority (LLFA) undertake investigations into flooding, review consent applications to undertake works on ordinary watercourses and carry out enforcement where lack of maintenance or unconsented works has resulted in a flood risk. In April 2015 the LLFA also became a statutory consultee on major planning applications in relation to surface water drainage and have a duty to review planning applications to ensure that the onsite drainage systems are designed in accordance with current legislation and guidance. The LLFA also ensures that flood risk to the site is accounted for when designing a drainage solution.</p> <p>The LLFA is not able to:</p> <ul style="list-style-type: none"> • Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation. • Use existing flood risk to adjacent land to prevent development. • Require development to resolve existing flood risk. <p>When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points:</p> <ul style="list-style-type: none"> • Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)). • Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map). • Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding. • How potential SuDS features may be incorporated into the development to enhance the local amenity, water quality and biodiversity of the site as well as manage surface water runoff. • Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk. |
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| | | <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 Flood map for planning (rivers and sea): https://flood-map-for-planning.service.gov.uk/</p> <p>Planning</p> <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> |
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| | | <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> <p>No comment at this time.</p> <p>Adult Social Care</p> <p>It is suggested that reference is made to recognising a significant growth in the older population and that development seeks to include bungalows etc of differing tenures to accommodate the increase. This would be in line with the draft Adult Social Care Accommodation Strategy for older people which promotes that people should plan ahead for their later life, including considering downsizing, but recognising that people's choices are often limited by the lack of suitable local options.</p> <p>Environment</p> |
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| | | <p>Specific Comments</p> <ul style="list-style-type: none"> • Page 26, Policy G10: Infill. The design policy is not as strong as others seen and could be further strengthened by mentioning aspects such as: roof and wall construction which follows technical best-practice recommendations for integral bird nest boxes and bat breeding and roosting sites, the provision of hedgehog friendly fencing, the incorporation of sustainable design and construction techniques to meet high standards for energy and water efficiency (including the use of renewable and low carbon energy technology - such as solar panels and rainwater harvesters) and the appropriate provisions for the storage of waste and recyclable materials. • The Plan does not reference flooding (if applicable) and a possible policy that takes this into account. • There is no reference regarding electric vehicles and their charge points. 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 may wish to address this. • There is no reference to monitoring/review timescales of the Neighbourhood Plan going forward. The Planning Group may wish to address this. • There is no reference to broadband/mobile phone connections within the parish or home working. Other Neighbourhood Plans we have seen do take these into account. <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</p> |
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| | | <p>District/Borough Council landscape character assessments and the Landscape Sensitivity and Green Infrastructure Study for Leicester and Leicestershire (2017) which examines the sensitivity of the landscape, exploring the extent to which different areas can accommodate development without impacting on their key landscape qualities. We would recommend that Neighbourhood Plans should also consider the street scene and public realm within their communities, further advice can be found in the latest 'Streets for All East Midlands' Advisory Document (2006) published by English Heritage.</p> <p>LCC would encourage the development of local listings as per the National Planning Policy Framework (NPPF) and LCC have some data on the social, cultural, archaeological and historic value of local features and buildings (https://www.leicestershire.gov.uk/leisure-and-community/history-and-heritage/historic-environment-record)</p> <p>Biodiversity</p> <p>The Natural Environment and Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, in the exercise of their duties, to the purpose of conserving biodiversity. The National Planning Policy Framework clearly outlines the importance of sustainable development alongside the core principle that planning should contribute to conserving and enhancing the natural environment, providing net gain for biodiversity, and reducing pollution. Neighbourhood Plans should therefore seek to work in partnership with other agencies to develop and deliver a strategic approach to protecting and improving the natural environment based on local evidence and priorities. Each Neighbourhood Plan should consider the impact of potential development or management of open spaces on enhancing biodiversity and habitat connectivity, such as hedgerows and greenways. Also, habitat permeability for habitats and species which addresses encouragement of movement from one location to another such as the design of street lighting, roads, noise, obstructions in water, exposure of species to predation and arrangement of land-uses.</p> <p>The Leicestershire and Rutland Environmental Records Centre (LRERC) can provide a summary of wildlife information for your Neighbourhood Plan area. This will include a map showing nationally important sites (e.g. Sites of Special Scientific Interest); locally designated Wildlife Sites; locations of badger setts, great crested newt breeding ponds and bat roosts; and a list of records of protected and priority Biodiversity Action Plan species.</p> <p>These are all a material consideration in the planning process. If there has been a recent Habitat Survey of your plan area, this will also be included. LRERC is unable to carry out habitat surveys on request from a Parish Council, although it may be possible to add it into a future survey programme.</p> <p>Contact: planningecology@leics.gov.uk, or phone 0116 305 4108</p> <p>Green Infrastructure</p> <p>Green infrastructure (GI) is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities, (NPPF definition). As a network, GI includes parks, open spaces, playing fields, woodlands, street trees, cemeteries/churchyards allotments and private gardens as well as</p> |
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| | | <p>streams, rivers, canals and other water bodies and features such as green roofs and living walls.</p> <p>The NPPF places the duty on local authorities to plan positively for a strategic network of GI which can deliver a range of planning policies including: building a strong, competitive economy; creating a sense of place and promote good design; promoting healthier communities by providing greater opportunities for recreation and mental and physical health benefits; meeting the challenges of climate change and flood risk; increasing biodiversity and conserving and enhancing the natural environment. Looking at the existing provision of GI networks within a community can influence the plan for creating & enhancing new networks and this assessment can then be used to inform CIL (Community Infrastructure Levy) schedules, enabling communities to potentially benefit from this source of funding.</p> <p>Neighbourhood Plan groups have the opportunity to plan GI networks at a local scale to maximise benefits for their community and in doing so they should ensure that their Neighbourhood Plan is reflective of the relevant Local Authority Green Infrastructure strategy. Through the Neighbourhood Plan and discussions with the Local Authority Planning teams and potential Developers communities are well placed to influence the delivery of local scale GI networks.</p> <p>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</p> |
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| | | <p>plans and programmes on the environment' (Environmental Assessment of Plans and Programmes Regulations, 2004, available online). This is often referred to as the SEA Directive. Not every Neighbourhood Plan needs a SEA, however, it is compulsory to provide when submitting a plan proposal to the local planning authority either:</p> <ul style="list-style-type: none"> • A statement of reasons as to why SEA was not required • An environmental report (a key output of the SEA process). <p>As the UK 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> |
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| | | <p>Fibre Broadband</p> <p>High speed broadband is critical for businesses and for access to services, many of which are now online by default. Having a 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 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: 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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| | | <p>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':-</p> <p>https://www.leicestershirecommunities.org.uk/sr/</p> |
| 6 | 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 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.</p> <p>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.</p> <p>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.</p> <p>Harborough DC have developed the;</p> |

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| | | <p>Open Spaces Strategy (2016 to 2021) Built Sports Facilities Strategy (including Village Halls and Community Hubs) 2020 Playing Pitch Strategy 2018</p> <p>Policy G8: Local Green Spaces does not appear to reflect the specific needs of formal sports facilities/playing fields as detailed in paragraph 97 of the National Planning Policy Framework (NPPF)</p> <p>If new or improved sports facilities are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p> <p>Any new housing developments will generate additional demand for sport. If existing sports facilities do not have the capacity to absorb the additional demand, then planning policies should look to ensure that new sports facilities, or improvements to existing sports facilities, are secured and delivered. Proposed actions to meet the demand should accord with any approved local plan or neighbourhood plan policy for social infrastructure, along with priorities resulting from any assessment of need, or set out in any playing pitch or other indoor and/or outdoor sports facility strategy that the local authority has in place.</p> <p>In line with the Government's NPPF (including Section 8) and its Planning Practice Guidance (Health and wellbeing section), links below, consideration should also be given to how any new development, especially for new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Sport England's Active Design guidance can be used to help with this when developing planning policies and developing or assessing individual proposals.</p> <p>Active Design, which includes a model planning policy, provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity. The guidance, and its accompanying checklist, could also be used at the evidence gathering stage of developing a neighbourhood plan to help undertake an assessment of how the design and layout of the area currently enables people to lead active lifestyles and what could be improved.</p> <p>NPPF Section 8: https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-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> |
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| | | | If you need any further advice, please do not hesitate to contact Sport England using the contact details below. |
| | The Coal Authority | | <p>Thank you for your email below regarding the Gilmorton Neighbourhood 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> |
| 7 | Harborough District Council | | <p>Para. 2.6 – 3rd sentence: To say 'land outside Limits to Development will be protected from housing development' does not reflect the NPPF or Policy G1 which refers to LP Policy GD3. Policy G1 refers to Policy GD3 and criterion f) of this policy allows for '<i>rural housing in accordance with Policy GD4 New housing in the countryside</i>'.</p> <p>Policy G3: the policy refers to '<i>the following important views and vistas (as set out in Appendix 1):</i>' This implies that they are meant to be listed in the policy but they are not.</p> <p>Policy G5: Site F label not clearly shown on Policies Map (hidden by NP area boundary).</p> <p>Policy G9: Local Heritage Assets do not show up very clearly on policies map – stronger colour would help. Policy implies that Ridge and Furrow is shown on Policies Map but this is not the case.</p> <p>Para 7.7: Suggest deleting 'updated' as there are currently no LTD.</p> <p>Policy G10: Policy G1 specifies: '<i>Development in the Countryside will be strictly controlled in accordance with Harborough Local Plan Policies SS1 and GD3.</i>' LP Policy GD3 f) allows for <i>rural housing in accordance with Policy GD4 New housing in the countryside</i>. Therefore, may be some potential conflict between approaches to rural housing as set out in G1 and G10.</p> |
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