

## Dunton Bassett 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	<b>Aithison Rafferty on behalf of Mr S B.. The Granary Spring Hill Office Park Harborough Road Pitsford Northampton NN6 9AA</b>	Objection in respect of Policies H1, H2, H3 and ENV3 relating to the proposed housing allocations and village boundary – Land off Lutterworth Road, Dunton Bassett	<p><b>1. INTRODUCTION AND BACKGROUND</b></p> <p>1.1 My name is Nigel Ozier, I am a Director at Aitchison Raffety, Chartered Town Planning Consultants and a member of the Royal Town Planning Institute. I have an Honours Degree in Urban and Regional Planning and have over 40 years' experience as a Chartered Town Planner.</p> <p>1.2 The purpose of this Statement is to set out, on behalf of Mr Stephen Barby, our objection to the Submission version of the Dunton Bassett Neighbourhood Plan, under the relevant Neighbourhood Planning Regulations 2012 (as amended). Essentially, the objection relates to the proposed Policies H1, H2 and H3 of the Neighbourhood Plan and seeks the inclusion within Policy H1 land off Lutterworth Road (south of Station Road) as a housing allocation for up to 25 dwellings. This objection also relates to the proposed designation of the land under Policy ENV3 and also refers to Policy H7 in the Plan which relates to Windfall Sites. Each of these elements are dealt with in this statement.</p>



*Google image*

1.3 As can be seen from the Google image above and the location plan below, the site lies east of Lutterworth Road and south of Station Road. The site has been previously considered for development and as I refer to later, assessed as part of the Neighbourhood Plan process. Representations were also submitted in 2021 in response to the District Council's 'call for sites.'

1.4 The site area is some 1.1 hectare and currently forms garden and residential curtilage to the property fronting Lutterworth Road known as 'Seven Elms' from where access is provided to the site forming part of this property. The adjoining land is residential although fronting Station Road to the east of a second access to the site is a former public house. It is understood that this site has consent for four detached dwellings. In addition, permission has been granted on the adjoining site south of 'Seven Elms' for three dwellings on the land to the rear of 'Holly Hurst'. The access off Station Road could form a pedestrian access and possibly an emergency access if needed.

1.5 It is considered that the access off Lutterworth Road is possible and I note that in the assessment of the site, no constraints to development were identified.



*Location Plan*

1.6 As indicated above, this objection is in relation to a number of the policies and proposals set out in the document which

		<p>I summarise here. Section 8 in the submission version sets out the details on housing provision and it is stated that the minimum housing requirement is 40 units. The evidence base for this has been provided by the District Council but while a 10% contingency has been considered taking the requirement to 44 units, the requirement is still set as a minimum.</p> <p>1.7 Policy H1 allocates land behind the children’s playground and west of Lutterworth Road for around 50 units as shown on Figure 2 in the document. This takes up about half of the existing open area west of Lutterworth Road. Policy H2 identifies a ‘reserve site’ which has been identified should there be any difficulties in bringing forward the allocated site and where the requirement in the district indicates a need for additional housing. I comment on this approach later.</p> <p>1.8 Policy H3 deals with the Settlement Boundary to the village. The setting of this boundary has effectively excluded my client’s site from the settlement and the position of the boundary is unacceptable. I deal with the methodology later.</p> <p>1.9 Policy H7 deals with Windfall Sites and indicates development is supported subject to a number of criteria. It is unclear if all the criteria have to be met.</p> <p>1.10 Policy ENV3 seeks to protect sites of natural environment significance. The policy indicates that the sites shown on Figure 6 have been chosen because of their local significance and natural environment features. They are considered as ecologically important in their own right and locally valued. It is considered in the policy that development would adversely affect them.</p> <p>1.11 In our view, it is considered that the proposed designation covering the land in Policy ENV3 and the proposed settlement boundary which excludes the site from the village is inappropriate and has not been based on any sound assessment. I will deal with the evidence base used below.</p> <p>1.12 The submission version of the Neighbourhood Plan should also be considered against national and development plan policies which remain a material planning consideration in considering any proposals for development. It is considered inappropriate to exclude land which is clearly part of the existing village and has no evidence to support the designation or to restrict the development of new housing.</p> <p><b>2. STRATEGIC HERITAGE ASSESSMENT</b></p> <p>2.1 A Strategic Heritage Assessment was undertaken which followed the principles within the NPPF and indicated by Historic England. The assessment examined the potential impact of 9 proposed development sites, which included my client’s site, and which recorded the current condition of these proposed development sites and surrounding heritage assets.</p> <p>2.2 The report indicated that the site inspections confirmed the proposed development sites were all agricultural land or presently (Land Parcel 1) allotments. Site 1 refers to the site subject of this objection and is mistaken as the land is garden and used only by my client not as allotments. With respect to the setting of heritage assets, the report found that three of the sites, including my client’s land, clearly fall outside the setting of any designated assets and development of these sites will have no heritage impact.</p> <p>2.3 Other sites had differing degrees of impact due to their relative proximity to heritage assets. The potential impact of development on designated heritage assets due to development within their settings was considered through the prism of</p>
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		<p>design and development principles set out by Historic England and the local plan. Development, when seen in the light of these principles, has not been found to be harmful in its effect on listed buildings in relation to four of the sites, again including my client's land.</p> <p>2.4 It is considered that the development of the site will have no impact on heritage assets and their settings whereas the proposed allocation will and that the Plan should consider the benefits of protecting these assets. In respect of the reserve site, the Heritage assessment identifies impact and also lies in open countryside outside the proposed settlement boundary. There is no supporting case for the inclusion of the reserve site.</p> <p><b>3. SITE SUSTAINABILITY ANALYSIS</b></p> <p>3.1 As part of the Plan process, a Site Sustainability Analysis was undertaken which has formed the basis for the ranking of sites and the selection of the proposed housing allocation in Policy H1 and the Reserve Site identified in Policy H2. An important objective set out in the Plan was to consider the housing need during the plan period and to identify the most sustainable site locations. I have indicated that the agreed housing need target has been set by Harborough District Council based upon a survey of the likely district-wide population increase set out in the adopted local plan. This set a target of 40 residential units to be built in the parish by 2031.</p> <p>3.2 The Site Sustainability Analysis sets out how sustainable housing sites were identified and selected. It indicates it is based on evidence collected and assessed by the group and supported by independent consultants. Two of the sites were selected from the SHLAA completed in 2016 and nine sites generated by local landowners through a "call for sites".</p> <p>3.3 In respect of these sites, a scoring matrix based upon the methodology used in the National Planning Policy Frameworks (NPPF) guidance (2018 and 2019) was drafted by the group <i>'to reflect the unique characteristics and scale of Dunton Bassett parish.'</i> A total of 11 sites of various sizes, ranging from 4 to 192 units were initially offered for residential development which were reduced to a scale along the lines dictated by housing need and subsequently 11 sites were reviewed, with twenty five sustainability indicators selected as the criteria.</p> <p>3.4 It is considered that the outcome of the scoring system is largely subjective and arbitrary. I suggest that if the scoring system, based on a Red, Amber or Green (RAG) score was applied correctly, then the selected site scores badly whereas my client's land scores far higher than the score of 1 indicated in the analysis. As part of the green criterion, a site had to be within the village envelope defined by Policy H3 which would therefore pre-empt the analysis. The selected site is only within the village envelope because the boundary had been placed around it. the analysis pre-empted the assessment and unfairly restricted the selection of my client's land. It is also confusing therefore how the reserve site is chosen given that development would extend the village into open countryside and outside of the village envelope.</p> <p>3.5 My client's land is only given the score of one green which does not reflect the correct suitability of the site. It does lie within the village and represents land within the residential curtilage of the owner's property which fronts onto Lutterworth Road. It is a flat site, in single ownership, would not harm any open space within the settlement and is only visible from a small number of properties. the land has no relevant designation or affects any site of nature conservation interest and has</p>
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		<p>no impact at all on any heritage asset. There are no contamination or drainage issues affecting the land.</p> <p>3.6 Compared with both the allocated site and reserve site, my client's land scores far higher in terms of the green criteria than has been presented in the Site Sustainability Analysis. It is considered that the analysis is flawed and has included pre-empted criteria which effectively excluded the site unfairly. In my view, the appropriate green score for the site would be far higher. The arbitrary way in which the criterion has been assessed is also clear from the comments on whether a site harms areas of natural environmental significance as defined by Policies ENV 3 and 5. As with the reference to the village boundary, by choosing my client's land as a site of natural environment significance under Policy ENV3 pre-empts the assessment and unfairly dismisses the opportunity for development. The restriction has been placed on the site without any evidence and then used as a red criterion in the analysis. The selection of the sites and the scoring is misapplied.</p> <p>3.7 I consider that the Site Sustainability Analysis has unfairly scored the site and that the choice of a number of the criteria has not ensured a high level of objectivity and consistency in scoring. The Analysis refers also to a recent appeal decision and it is relevant that it was emphasised that the plan should try to promote small scale infill developments or limited extensions, rather than a large single development. The Plan has not followed this view in selecting one large site for development. Wrongly, the Group conclude that there were absolutely no small sites remaining. It is indicated also that the assessment criteria and site assessments were revisited so that sites which would result in significant and conspicuous extensions of the build form into open countryside would not be favoured over those which were more infill in nature. However, the allocated site extends into a larger open area and the reserve site extends into open countryside. In my view, the approach is not appropriate and is in conflict with the clear aims set out in the Plan. The outcome of the process has unfairly scored sites including my client's land.</p> <p><b>4. OBJECTION TO POLICY H1</b></p> <p>4.1 Policy H1 – Residential site allocation, states that:</p> <p><i>'Land is allocated at land behind the children's playground for around 50 units of residential accommodation as shown in figure 2 below. Development will be supported subject to:</i></p> <ul style="list-style-type: none"> <li><i>a) At least 40% of the dwellings shall be Affordable Housing (including bungalows which can be counted on the basis of 2 for 1 Affordable units) spread throughout the site in clusters and visually indistinguishable from the market dwellings;</i></li> <li><i>b) At least 66% of the housing types shall be properties of three or fewer bedrooms in line with identified housing need;</i></li> <li><i>c) A desk-based heritage assessment and geophysical survey shall be undertaken and its conclusions followed, including trial trenching if required prior to development;</i></li> <li><i>d) The footpath through the site shall be enhanced to improve connectivity with village facilities;</i></li> <li><i>e) A car park with associated open space shall be provided alongside the cricket field for the use of the Cricket Club and residents of the Parish;</i></li> <li><i>f) The existing playground will be extended;</i></li> </ul>
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		<p>dimensions to sustainable development which include economic, social and environmental roles.</p> <p>8.4 At the heart of the NPPF lies the presumption in favour of sustainable development (paragraph 14) which should be seen as a golden thread running through both plan-making and decision-making. For plan-making this means that plan-makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change.</p> <p>8.5 The application of the presumption has implications for neighbourhood planning (paragraph 14). Critically it means that neighbourhoods should: -</p> <ul style="list-style-type: none"> <li>- <i>develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;</i></li> <li>- <i>plan positively to support local development, shaping and directing development in their area that is outside the strategic elements of the Local Plan; and</i></li> <li>- <i>identify opportunities to use Neighbourhood Development Orders to enable developments that are consistent with their neighbourhood plan to proceed.</i></li> </ul> <p>8.6 The Framework seeks to build a strong, competitive economy and within paragraph 21 states that <i>“Planning should operate to encourage and not act as an impediment to sustainable growth... Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing”</i></p> <p>Planning Practice Guidance</p> <p>8.7 Neighbourhood planning is described within National Planning Practice Guidance as providing <i>“a powerful set of tools for local people to ensure that they get the right types of development for their community where the ambition of the neighbourhood is aligned with the strategic needs and priorities of the wider area”</i> (Paragraph 001, reference ID: 41-001-20140306).</p> <p>8.8 Paragraph 40 (ID 41-040-20160211) states that the evidence required to support a Neighbourhood Plan should be proportionate, based upon robust evidence to support the choices made and approach taken. The Planning Authority is also required to provide constructive comments on an emerging Plan or Order before it is submitted (Paragraph 53 ID: 41-053020140306). The Authority should discuss the contents of any supporting documents, including the basic conditions statement. If a Local Planning Authority considers the draft Neighbourhood Plan may fall short of meeting one or more of the basic conditions, they should discuss their concerns with the qualifying body in order that these can be considered before the draft Plan or Order is formally submitted, in accordance with paragraph 67 ID: 41-067-20140306.</p> <p>8.9 Written representations will be taken into account by the examiner as set out within Paragraph 56 ID: 41-056-20140306. Furthermore, a Neighbourhood Plan or Order must not constrain the delivery of important national policy objectives. The National Planning Policy Framework is the main document setting out the Government’s planning policies for England and how these are expected to be applied (Paragraph 69 ID:41-069-20140306).</p> <p>8.10 I consider that Policies H1, H2, H3 and ENV3 in their current form fail to comply with the various key paragraphs of the</p>
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			<p>Framework and PPG. The basis of these policies fail to meet basic conditions as required by the Act. The evidence needed to support a neighbourhood plan is clear in the guidance and while there are prescribed documents that must be submitted with a Neighbourhood Plan or Order there is no 'tick box' list of evidence required for neighbourhood planning. Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft Neighbourhood Plan or the proposals in an Order. A local planning authority should share relevant evidence, including that gathered to support its own plan-making, with a qualifying body.</p> <p>8.11 I do not consider the proposed designation of my client's land, its omission from the village envelope and the selection process for housing allocations has been supported by a robust or credible evidence base.</p> <p><b>9. CONCLUSIONS</b></p> <p><b>Assessment against the basic conditions</b></p> <p>9.1 We object to the submission version of the Neighbourhood Plan which potentially restricts future development of the land identified in this report.</p> <p>9.2 This objection seeks the inclusion of my client's land for residential development based on the clear benefits and there seeks changes to Policy H1.</p> <p>9.3 It is considered that Policy H2 should be omitted and that any review of the Plan would consider development opportunities in relation to the development plan. we seek the inclusion of the site within the village boundary and the omission from the designation in Policy ENV3. We believe that these assessments do not reflect the NPPF or PPG and based upon an unsound assessment.</p>
	<p><b>Harborough District Council (Development Management) Council Offices, Adam and Eve St, Market Harborough</b></p>	Policy H2	<p>We remain concerned about the inclusion of the reserve site for housing under policy H2. We consider that housing in this location is likely to cause harm to the character and appearance of the countryside and the area, and proposals for housing in a similar location were dismissed twice at appeal (appeal refs APP/F2415/W/18/3216471 and APP/F2415/W/19/3233195). Furthermore, if this site is included in the Plan, H2 should include more criteria to be met by proposed development, similar to those included in policy H1. If there is conflict between this allocation/policy and policy ENV9 (Important Open Views) then it should be addressed and resolved within the Plan.</p>
	<p><b>Harborough District Council (Conservation Officer) Adam and</b></p>	P44 – ridge and furrow	<p>P 44 discusses ridge and furrow and indicates that following Historic England's recommendation, all surviving ridge and furrow should be regarded as a non-designated heritage asset. Clive Fletcher's email refers to treatment of the ridge and furrow as undesignated where 'evidence of it is still visible'.</p> <p><i>(FOR INFORMATION – Historic England Response to SEA screening</i>  <i>Dear Mr Bills,</i>  <i>Further to my email we have received correspondence from a member of the public reminding us that the allocation</i></p>

<p><b>Eve St, Market Harborough</b></p>		<p>ENV 8</p>	<p><i>site was featured in our report “Turning the Plough” as an area of ridge and furrow. In such instances we advise that the area is treated as an undesignated heritage asset where evidence of it is still visible, as we observe it is here.</i></p> <p><i>Yours sincerely, Clive Fletcher</i></p> <p><i>Dear Mr Bills,</i></p> <p><i>Thank you for consulting us on the Dunton Bassett Neighbourhood Plan and SEA Screening Report. We have looked at the documents, and note the presence of a housing allocation (Policy H1), which is adjacent to the “Dunton Bassett Moated Site with Fish Pond” Scheduled Monument. Development here will inevitably affect the setting of the monument, and may harm its significance, so we disagree with the conclusions of the Screening Report which advises that SEA will not be necessary – in our view the allocation would have significant environmental effects. We further advise that the presence of the allocation may present a risk to the plan, as harm to the significance of a designated heritage asset runs contrary to the NPPF’s requirement for sustainable development. SEA would establish what effects the allocation would have and inform the neighbourhood group’s decision on whether to retain it.</i></p> <p><i>Yours sincerely,</i></p> <p><i>Clive Fletcher, Principal Advisor and Lead Specialist, Historic Places)</i></p> <p>Policy ENV 8 states ‘The areas of well-preserved ridge and furrow earthworks (see Figure 12.2) are non-designated heritage assets.’ For consistency and clarity it may be appropriate to rephrase, such as ‘Areas where there is visible evidence of ridge and furrow earthworks ...’</p>
<p><b>Highways England Assistant Spatial Planner The Cube 199 Wharfside Street Birmingham B1 1RN</b></p>			<p><b>Dunton Bassett Neighbourhood Plan Regulation 16 Consultation</b></p> <p>Thank you for consulting National Highways (formally Highways England) on the Dunton Bassett draft Neighbourhood Plan. National Highways 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.</p> <p>In responding to Local Plan consultations, we have regard to DfT Circular 02/2013: The Strategic Road Network and the Delivery of Sustainable Development (‘the Circular’). This sets out how interactions with the Strategic Road Network should be considered in the making of local plans. In addition to the Circular, the response set out below is also in accordance with the National Planning Policy Framework (NPPF) and other relevant policies.</p> <p>National Highways principal interest is in safeguarding the operation of the M1 motorway which routes through the Plan area, and the A5 trunk road and M69 motorway which route approximately four miles to the southwest and five miles to the northwest of the Plan area respectively.</p> <p>We responded to the pre-submission version of the Dunton Bassett neighbourhood in March 2021. At that time, we advised that due to the scale and anticipated distribution of the additional development growth being proposed through the Neighbourhood Plan, it is unlikely that there will be any significant impacts on the operation of the SRN in the area. Our latest response is consistent with the above and we have no further comments to make.</p>

			<p>If I can be of any further assistance on this matter, please do not hesitate in contacting me. Yours sincerely,</p>
	<p><b>Natural England</b> <b>Robbie Clarey</b> <b>Lead adviser – Sustainable Development</b></p>	<p>Policy H1</p> <p>Policy ENV5</p>	<p>We welcome the requirement for Biodiversity Net Gain within Policy ‘H1: Residential Site Allocation’. We would recommend further adding to this part of the policy to ensure the use of a recognised Biodiversity Metric, i.e. DEFRA’s Biodiversity Metric 3.0. We would also like to see a requirement for SuDS within this policy; often the delivery of SuDS and Biodiversity Net Gain can go hand in hand.</p> <p>We also welcome policy ‘ENV 5: Biodiversity and Habitat Connectivity’ and the inclusion/identification of wildlife corridors within the plan; the intention to retain these corridors of ecological connectivity. This will help to retain the connectivity of the area and contribute to the wider Nature Recovery Network. We would like to encourage further wording within this policy to ensure all development in the parish (i.e. windfall) delivers a measurable Biodiversity Net Gain.</p>
	<p><b>Leicestershire County Council</b> <b>Nik Green</b> <b>County Hall</b> <b>Glenfield</b> <a href="mailto:neighbourhoodplanning@leics.gov.uk">neighbourhoodplanning@leics.gov.uk</a></p>		<p><b>Dunton Bassett Neighbourhood Plan Comments Requested – 30<sup>th</sup> March 2022</b></p> <p>Leicestershire County Council is supportive of the Neighbourhood plan process and welcome being included in this consultation.</p> <p><b>Highways</b></p> <p><b>General Comments</b></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. 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</p>

		<p>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><b>Flood Risk Management</b></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. The LLFA is not able to:</p> <ul style="list-style-type: none"> <li>• • Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation.</li> <li>• • Use existing flood risk to adjacent land to prevent development.</li> <li>• • Require development to resolve existing flood risk.</li> </ul> <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"> <li>• • Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)).</li> <li>• • Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map).</li> <li>• • Locating development outside of any groundwater flood risk by considering any local knowledge of</li> </ul>
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		<p>groundwater flooding.</p> <ul style="list-style-type: none"> <li>• 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.</li> <li>• Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk.</li> </ul> <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:  <a href="https://flood-warning-information.service.gov.uk/long-term-flood-risk">https://flood-warning-information.service.gov.uk/long-term-flood-risk</a></p> <p>Flood map for planning (rivers and sea):  <a href="https://flood-map-for-planning.service.gov.uk/">https://flood-map-for-planning.service.gov.uk/</a></p> <h2>Planning</h2> <h3>Minerals &amp; Waste Planning</h3> <p>The County Council is the Minerals and Waste Planning Authority; this means the council prepares the planning policy for minerals and waste development and also makes decisions on mineral and waste development. Although neighbourhood plans cannot include policies that cover minerals and waste development, it may be the case that your neighbourhood contains an existing or planned minerals or waste site. The County Council can provide information on these operations or any future development planned for your neighbourhood.</p>
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		<p>species to predation and arrangement of land-uses.</p> <p>The Leicestershire and Rutland Environmental Records Centre (LRERC) can provide a summary of wildlife information for your Neighbourhood Plan area. This will include a map showing nationally important sites (e.g. Sites of Special Scientific Interest); locally designated Wildlife Sites; locations of badger setts, great crested newt breeding ponds and bat roosts; and a list of records of protected and priority Biodiversity Action Plan species. These are all a material consideration in the planning process. If there has been a recent Habitat Survey of your plan area, this will also be included. LRERC is unable to carry out habitat surveys on request from a Parish Council, although it may be possible to add it into a future survey programme. Contact: <a href="mailto:planningecology@leics.gov.uk">planningecology@leics.gov.uk</a>, or phone 0116 305 4108</p> <p><b>Green Infrastructure</b></p> <p>Green infrastructure (GI) A network of multi-functional green and blue spaces and other natural features, urban and rural, which is capable of delivering a wide range of environmental, economic, health and wellbeing benefits for nature, climate, local and wider communities and prosperity (NPPF definition). As a network, GI includes parks, open spaces, playing fields, woodlands, street trees, cemeteries/churchyards allotments and private gardens as well as streams, rivers, canals and other water bodies and features such as green roofs and living walls.</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 &amp; 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><b>Brownfield, Soils and Agricultural Land</b></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>
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		<p>local communities. Neighbourhood Plans provide an opportunity to;</p> <ol style="list-style-type: none"> <li>1. Carry out and report on a review of community facilities, groups and allotments and their importance with your community.</li> <li>2. Set out policies that seek to; <ul style="list-style-type: none"> <li>• protect and retain these existing facilities,</li> <li>• support the independent development of new facilities, and,</li> <li>• identify and protect Assets of Community Value and provide support for any existing or future designations.</li> </ul> </li> <li>3. Identify and support potential community projects that could be progressed.</li> </ol> <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 <a href="http://www.leicestershirecommunities.org.uk/np/useful-information">www.leicestershirecommunities.org.uk/np/useful-information</a>.</p> <h3>Economic Development</h3> <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> <h3>Fibre Broadband</h3> <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. 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>
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	<p><b>Leicestershire Police Designing Out Crime Officer</b></p>	<p>I am writing to you in my capacity as the Leicestershire Police Designing out Crime Officer (DOCO). I have been requested to comment on behalf of Leicestershire Police in relation to the proposed Dunton Bassett Neighbourhood Plan as part of the proposed by Harborough District Council Local Plan Database.</p> <p>Leicestershire Police support the creation of a Dunton Bassett Neighbourhood Plan, which has a primary objective to reflect the community wide views, comments, observations, concerns and ambitions about Dunton Bassett's planning in respect to future applications and their implications.</p> <p>Leicestershire Police will always attempt to reflect the aspirations of all the residents and people who work, study and pass</p>

		<p>through the area in the way that they Police the area, and will continue to do so, taking into consideration the contents of future Dunton Bassett Neighbourhood Plans. Neighbourhood Policing is a central part of Policing with resources deployed to provide visible presence and deterrent to potential offenders and contact for members of the public.</p> <p>Future planning applications and any additional demand on Policing resources, will need consideration, as currently resources are deployed from areas outside Dunton Bassett. Due to changes in the Policing estate, Police responses will still be maintained through new innovation and technological advances. Neighbourhood Policing will be maintained and continue to provide a close link to the community they serve and effective community consultation.</p> <p>To maintain the current levels and to accommodate future additional demand created by population growth and the resultant new dwellings, and associated infrastructure of schools, commercial, retail and other facilities such as open space additional Policing considerations should be taken into consideration.</p> <p>Open Space is a key issue for Policing within the planning process of new developments with particular attention to Safer Streets issues. Ongoing government funding has been focused on providing Safer Routes through Open Spaces with attention to trimming of ground level foliage to 1m and trees to have foliage trimmed to 2m from the ground to provide a 1m clear field of vision. Also lighting, signage and CCTV improvements are under consideration. Any new appropriate Open Spaces should consider these issues, to provide safe transit and use of these areas. Women and girls, as well as all vulnerable persons have been subject to crime and would be able to benefit from early consideration via the planning process.</p> <p>Paragraph 91(b) of NPPF 2019 specifically provides that  “Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:  b) Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion...”</p> <p>Hence the inclusion of a police contribution to Leicestershire Police in Priority 2c.</p> <p>Policing is a 24/7 service resourced to respond and deploy on an "on demand" and "equal access" basis and is wholly dependent on a range of facilities for staff to deliver this. A primary issue for Leicestershire Police is to ensure that new large-scale developments make adequate provision for the future policing needs that it will generate.</p> <p>At present Dunton Bassett has no current Policing facilities. However, where additional development is proposed, Leicestershire Police may seek to deploy additional staffing and additional infrastructures to ensure quality neighbourhood community-based policing.</p> <p>Dunton Bassett are requested to work with Leicestershire Police by consulting with them on large-scale applications, firstly to gain their perspective from a design front and secondly to understand whether the associated growth would produce a need for additional Policing infrastructure. If this is the case then Leicestershire Police will assess each application on an individual basis, by looking at the current level and location of available officers and then the demand associated with that development. A request for developer contributions may then be submitted to go towards the additional infrastructure needed to maintain a sustainably high level of policing within the areas covered by Dunton Bassett Parish Council.</p> <p>Section 17 of the Crime and Disorder Act 1998 states all relevant authorities have a duty to consider the impact of all their functions and decisions on crime and disorder. Leicestershire Police will work closely with our partners to design out these risks wherever possible.</p> <p>Areas including public space, shop frontages and appropriate security such as shutters should include sympathetic design and be in keeping with local architecture, whilst still providing effective security.</p>
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			<p>Other key areas where planning can support the local businesses includes the night time economy. Effective planning including lighting and use of CCTV if required will reduce the risk of crime and disorder. In support of managing these requirements providing a 24/7 service Leicestershire Police will continue to provide to residents of Dunton Bassett.</p> <p>S106 Agreements</p> <p>S106 Applications will be applied for in support of health, education provision, open space and other public services and likewise, Leicestershire Police would look to apply for support as a result of any additional policing demand created. Any such funds would allow consideration of equipment or in support of estate to support responses to Dunton Bassett, though Leicestershire Police will consider estate on an ongoing basis. Harborough District Council have S106 Agreements in respect to new developments within the area in support of Policing.</p> <p>Statutory funding via the Policing precept and Government would follow on after occupation of any new dwellings. Also, where new demand is placed on Policing resources due to expansion, Leicestershire Police, Harborough District Council and Dunton Bassett Parish Council residents within Dunton Bassett would benefit from support of the provision of S106 and future S106 bids being considered in support of Policing provision within the Dunton Bassett Parish Council area.</p> <p>Consultations on Planning Applications</p> <p>Current planning consultations referred to Leicestershire Police have provided the opportunity to comment on a number of applications. It would be beneficial if further comment was referred in respect to large developments either residential or commercial. Also where there is an increased risk of public safety via open space and large footfall as well as areas relating to changes to the night economy would be appreciated (Section 17 of Crime &amp; Disorder Act 1998). Traveller provision is another area where Policing considerations are recommended wherever possible for comment and consideration.</p>
	<p><b>Richborough Estates Boyer Planning</b></p> <p><b>1a Cedars Office Park, Butt Lane, Normanton, Loughborough, LE12 5EE</b></p>	<p>Section 3, page 7</p>	<p>Richborough Estates wish to express their support to the Dunton Bassett Neighbourhood Plan 2020-2031 Submission Version Consultation (May 2022).</p> <p>Richborough Estates are the promoters of the the principal proposed allocation of Site A (land behind the children’s playground) and Reserved Site B’ (land north of Old Coach Road) for the residential development of a total of 100 dwellings over the plan period. The allocation of these two proposed sites are highly supported as Site A (development of approximately 50 dwellings) would help meet the current housing needs of Dunton Bassett and the approach to a reserved site (development of approximately 50 dwellings) provides a flexible arrangement so that future housing can come forward during the plan period, in addition to Site A, should circumstances require it to.</p> <p>Richborough consider that there are no constraints to impact on the deliverability of either site, however the approach taken is sensible in building flexibility to the plan should the reserve site be required.</p> <p>The proposed Neighbourhood Plan’s vision, aims and achievements are supported as the proposals contained in the DBNP seek to promote housing and employment growth so that current and future needs of local residents can be met from development that takes place in the most suitable locations. More importantly, the proposed plan recognises the need to provide a mix of market and affordable housing to meet the needs of the present and future generations to come.</p> <p>The proposed DBNP has been positively prepared and supported with proportionate and robust information, including a</p>

		<p>Section 8, page 14.</p> <p>Policy H1 and Policy H2</p>	<p>recent housing needs assessment of Dunton Bassett and is considered to have met the legal requirements set out in Schedule 4B of the Town and Country Planning Act 1990 (as Amended).</p> <p>The proposed plan has been prepared to meet the housing and economic needs of the local population. A robust community engagement strategy with the gathering of evidence has together identified suitable and sustainable locations for residential development which have informed the proposed allocations and policies contained within the DBNP. These policies support sustainable development and conform to policies contained in the Harborough District Council adopted Local Plan (2019) including:</p> <p>Policy SS1: Spatial Strategy  Policy GD1: Achieving Sustainable Development  Policy H1: Provision for Housing  Policy H2: Affordable Housing  Policy H5: Housing density, mix and standards</p> <p>Dunton Bassett is a sustainable village equipped with a number of services and facilities that continue to meet the daily needs of the local community. It is well related to the local and strategic road network, with direct links to Lutterworth (south) and Blaby and Leicester City (north) and the M1 Motorway via the A426. Broughton Astley is a Key Centre identified in the adopted Local Plan (2019) and is located approximately 0.9m northwest of the village where there is access to a wider range of services and facilities.</p> <p>The development of the proposed allocations; Site A and Site B identified in Figure 2 of the proposed DBNP, present suitable and sustainable locations for residential development that are well related to the built-up area and are not located in sensitive landscapes or constrained by flooding or any other major constraints.</p> <p>Site A and Site B comprise of greenfield sites that are contained by the local road network and by field boundaries with existing tree lines. Either site would form a logical extension to the existing settlement boundary.</p> <p>The development of Site B as a reserved site when required would provide a suitable reserve location for new homes that would not be disproportionate in scale or relationship to the existing settlement.</p> <p>As such proposed Policy H1: Residential site allocation – land behind the children’s playground for around 50 units of residential accommodation and Policy H2: Reserved Site – An allocation for around 50 houses at the site at the junction of Broughton Lane and Coopers Lane contained within the DBNP are highly supported. The scale and development of the two sites over the plan period would still be proportionate to the growth and development of Dunton Bassett, without having negative effects on the local amenity and surrounding environment and continue to support the Spatial Strategy of the adopted Local Plan.</p>
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		<p>The Sustainability Report (2018), which supports the adopted Local Plan (2019) notes that increased housing of up to 81 dwellings in Dunton Bassett would have a positive effect in meeting local housing needs and help support the vitality of the village. Housing on this scale would improve the offer and choice of mixed tenure market and affordable housing of different sizes to meet local needs would be beneficial as more than 50% homes in Dunton Bassett are detached and affordability in the village remains a challenge.</p> <p>Both sites have been selected through a robust consultation by the local community and have been assessed and scored using a RAG matrix and against a number of other sites, which have been based on a methodology guided by the National Planning Policy Framework and National Planning Practice Guidance (2018 and 2019).</p> <p>The preferred access arrangements for Site A would be directly off the A426 Lutterworth Road which from the technical transport work undertaken by Richborough to-date is feasible and would be considered as part of the planning application process for the site.</p> <p>The HDC adopted Local Plan (2019), seeks the overall provision of 3,975 new homes over the plan period. Dunton Bassett falls within the Selected Rural Village of the Settlement Hierarchy set out in Policy SS1: Spatial Strategy of the adopted Local Plan (2019), where a limited amount of development is supported. Policy H1: Provision of New Housing, stipulates that a minimum of 40 dwellings will be delivered in Dunton Bassett over the plan period.</p> <p>As such, the proposed allocations for the residential development set out in the Dunton Bassett Neighbourhood Plan would together provide a proportionate amount of housing provision over the plan period, that would support the growth, vitality and viability of Dunton Bassett as a sustainable village. The proposed allocation of Site A and Site B would not only conform to Policy H1 of the Local Plan, however would also make a meaningful contribution to the overall housing requirement.</p> <p>The proposed housing provision set out in the DBNP is above the housing requirement set out in the HDC adopted Local Plan (2019), however this is a minimum requirement, as such the proposed allocations of the DBNP conforms with the Local Plan and Section 5 of the National Planning Policy Framework (2019) in delivering a sufficient supply of homes.</p> <p>The benefits of allocating medium scale developments can provide for a number of socio-economic and environment benefits as opposed to small scale development (0-10 dwellings). These can include facilitating higher levels of S106 contributions for local services, affordable housing and a more comprehensive mix and range of house sizes and types, which are particularly required in Dunton Bassett. Other benefits can include ecological and biodiversity enhancements and offer opportunities for wider infrastructure improvements.</p> <p>Overall, Richborough Estates support the proposed DBNP including proposed Policies H1 and H2. It is considered that the proposed DBNP meets the basic conditions for examination and subsequent adoption by HDC.</p> <p>Should the Neighbourhood Plan successfully proceed through Examination, Richborough Estates confirm their intention to</p>
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		<p>prepare an outline application for submission to HDC at the earliest opportunity to bring forward the proposed allocated site. Richborough Estates thank the Parish Council for their cooperation to-date and look forward to working with them to assist in delivering the positive growth for the benefit of the residents of Dunton Bassett.</p>
	<p><b>Severn Trent Water Chris Bramley Strategic Catchment Planner</b></p>	<p>Dunton Bassett Neighbourhood Plan submission version</p> <p>Thank you for the opportunity to comment on your consultation, Severn Trent are generally supportive of the principles outlined within the neighbourhood plan. There area however a few areas of the plan that we feel could be enhanced by some minor changes to assist with the delivery of the plan objectives and deliver wider benefits. We note that a several points have been raised previously as part of the Pre-submission Consultation Process.</p> <p><b>Policy H1: Residential Site Allocation</b></p> <p>Severn Trent would not raise any specific concerns regard a development of this scale, provided surface water is managed sustainably and discharged to a sustainable outfall, in accordance with the drainage hierarchy. We would therefore recommend that this requirement is detailed within Policy H1</p> <p>In addition, we would however encourage developers to contact Severn Trent early within their design process to ensure a viable outfall location can be agreed and where required any localised improvements can be programmed into our plans.</p> <p><b>Policy H5: Design Quality</b></p> <p>Severn Trent are supportive of the approach highlighted in bullet point e to enhance biodiversity and relate to the natural topography, thank you for incorporating a reference to watercourses (including ditches) such that they are protected and retained as open features where possible.</p> <p>Severn Trent are supportive of the approach to encourage and incorporate SuDS and water efficiency in bullet point g. We would however recommend that the statement also references:</p> <ul style="list-style-type: none"> <li>• the Drainage Hierarchy to ensure that surface water is discharged to the most sustainable outfall,</li> <li>• that SuDS are designed in accordance with current industry best practice to provide wider benefits that just retention of surface water and,</li> <li>• that water efficiency is designed to meet the optional target set out in Building Regulations part g</li> </ul> <p><b>Drainage Hierarchy</b></p> <p>Surface water can leave new development sites in a number of different ways, the drainage hierarchy (Planning Practice Guidance Paragraph 80) sets out the order in which these options should be considered based around how sustainable the outfalls are, it is vital that new 2</p> <p>development directs surface water to the most appropriate outfall, and would therefore recommend that the drainage hierarchy is detailed within the Design Policy. Some example wording is:</p> <p><b><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></b></p> <p><b>SuDS</b></p> <p>Severn Trent note that industry best practice (CIRIA C753 the SuDS Manual) identifies that SuDS should be designed to perform against 4 key pillars:</p>

		<p>1. Water Quantity (Flow rate and volume),  2. Water Quality (discharge water as clean as possible)  3. Biodiversity (support wildlife)  4. Amenity (support wider community activities)</p> <p>This approach can be both beneficial in terms of land take for the developer by enabling land to count towards green space and flood alleviation. It also looks to ensure that SuDS are considered as part of the initial design and incorporated into the site as resources rather than last minute additions. Some example wording to assist in the interpretation of this recommendation is:</p> <p><b><i>All major developments shall ensure that Sustainable Drainage Systems (SuDS) for the management of surface water run-off are put in place unless demonstrated to be inappropriate.</i></b>  <b><i>All schemes for the inclusions of SuDS should demonstrate they have considered all four aspects of good SuDS design, Quantity, Quality, Amenity and Biodiversity, and the SuDS and development will fit into the existing landscape.</i></b>  <b><i>The completed SuDS schemes should be accompanied by a maintenance schedule detailing maintenance boundaries, responsible parties and arrangements to ensure that the SuDS are maintained in perpetuity.</i></b>  <b><i>Where possible, all non-major development should look to incorporate these same SuDS principles into their designs.</i></b></p> <p>The supporting text for the policy should also include:  <i>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.</i></p> <p><b>Water efficiency</b>  The increasing number of dwellings, businesses and consumers for water are putting additional strain on the sources of clean water, Severn Trent are managing the capacity of our water sources such that our abstractions cause minimal damage to the natural environment whilst also meeting the demand for water from our customers. This increasing issue has been recognised in our Water Resource Management Plan, the Humber River Basin Catchment Management Plan. It is important that new development also play's it's part in using our vital resources sustainably.  We would recommend that alongside the reference to water efficiency detailed within your current policy the neighbourhood plan also references the optional water efficiency target set out within 3</p> <p>Building Regulations Part G, as this will provide a clear direction to developers about what is expected.  To assist with this recommendation we have provided some example wording:  <b><i>Development proposals should demonstrate 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.</i></b></p> <p><b>Policy ENV1: Local Green Space</b></p>
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		<p>surface water the appropriate discharge of these flows is vital to ensuring that sewer flood risk is not unduly increased. 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><b>Position Statement</b></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><b>Sewage Strategy</b></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><b>Surface Water and Sewer Flooding</b></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 5</p> <p>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  <a href="https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/">https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/</a></p> <p><b>Water Quality</b></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</p>
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		<p>Management Plan for the Severn River basin unit as prepared by the Environment Agency.</p> <p><b>Water Supply</b> When specific detail of planned development location and sizes are available a site specific assessment of the capacity of our water supply network could be made. Any assessment will involve carrying out a network analysis exercise to investigate any potential impacts. We would not anticipate capacity problems within the urban areas of our network, any issues can be addressed through reinforcing our network. However, the ability to support significant development in the rural areas is likely to have a greater impact and require greater reinforcement to accommodate greater demands.</p> <p><b>Water Efficiency</b> Part G of Building Regulations specify that new homes must consume no more than 125 litres of water per person per day. We recommend that you consider taking an approach of installing specifically designed water efficient fittings in all areas of the property rather than focus on the overall consumption of the property. This should help to achieve a lower overall consumption than the maximum volume specified in the Building Regulations. We recommend that in all cases you consider:</p> <ul style="list-style-type: none"> <li>• Single flush siphon toilet cistern and those with a flush volume of 4 litres.</li> <li>• Showers designed to operate efficiently and with a maximum flow rate of 8 litres per minute.</li> <li>• Hand wash basin taps with low flow rates of 4 litres per minute or less.</li> <li>• Water butts for external use in properties with gardens.</li> </ul> <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 <a href="https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/">https://www.stwater.co.uk/building-and-developing/regulations-and-forms/application-forms-and-guidance/infrastructure-charges/</a> 6</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. 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. 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 as described in Part G of Schedule 1 to the Building Regulations 2010. As such Severn Trent's recommendation is consistent with wider objectives within our water supply regions.</p>
	<p><b>Sport England</b> <b>Sport Park, 3 Oakwood</b></p>	<p>Thank you for consulting Sport England on the above neighbourhood plan.</p> <p>Government planning policy, within the <b>National Planning Policy Framework (NPPF)</b>, identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging</p>

<p><b>Drive, Loughborough, Leicester, LE11 3QF</b></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 98 and 99. It is also important to be aware of Sport England’s statutory consultee role in <b>protecting playing fields</b> 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.  <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#playing_fields_policy</a></p> <p>Sport England provides guidance on <b>developing planning policy</b> 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.  <a href="https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications">https://www.sportengland.org/how-we-can-help/facilities-and-planning/planning-for-sport#planning_applications</a></p> <p>Sport England works with local authorities to ensure their Local Plan is underpinned by robust and up to date evidence. In line with Par 99 of the NPPF, this takes the form of <b>assessments of need and strategies for indoor and outdoor sports facilities</b>. 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>Where such evidence does not already exist then relevant planning policies in a neighbourhood plan should be based on a proportionate assessment of the need for sporting provision in its area. Developed in consultation with the local sporting and wider community any assessment should be used to provide key recommendations and deliverable actions. These should set out what provision is required to ensure the current and future needs of the community for sport can be met and, in turn, be able to support the development and implementation of planning policies. Sport England’s guidance on assessing needs may help with such work.  <a href="http://www.sportengland.org/planningtoolsandguidance">http://www.sportengland.org/planningtoolsandguidance</a></p> <p>If <b>new or improved sports facilities</b> are proposed Sport England recommend you ensure they are fit for purpose and designed in accordance with our design guidance notes.  <a href="http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/">http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</a></p> <p>Any <b>new housing</b> 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 <b>any new development</b>, 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: <a href="https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities">https://www.gov.uk/guidance/national-planning-policy-framework/8-promoting-healthy-communities</a></p> <p>PPG Health and wellbeing section: <a href="https://www.gov.uk/guidance/health-and-wellbeing">https://www.gov.uk/guidance/health-and-wellbeing</a></p> <p>Sport England's Active Design Guidance: <a href="https://www.sportengland.org/activedesign">https://www.sportengland.org/activedesign</a></p>
	<p><b>Andrew Granger By Stephen Mair Director, Planning &amp; Development Andrew Granger &amp; Co. Ltd.</b></p>	<p>Section 8.4 Economy</p> <p>Dear Sirs</p> <p>On behalf of our landowner clients, we (Andrew Granger &amp; Co.) wish to make the following observations on the Dunton Bassett Neighbourhood Plan Submission version, currently subject to consultation until 11<sup>th</sup> May 2022.</p> <p>Our comments relate specifically to Section 8.4 Economy.</p> <p>We believe that supporting the growth of the local economy is vital and reflects the objectives of the National Planning Policy Framework and the adopted Harborough Local Plan. Support for new businesses alongside retaining existing businesses within the Neighbourhood Plan Area and wider District and enabling businesses to expand, grow and thrive should be fundamental.</p> <p>With regards to the parish of Dunton Bassett this should be a priority in order to meet the lack of significant local employment opportunities identified within the Neighbourhood Plan.</p> <p>We propose that Policy E1: Support for existing employment opportunities should be amended to provide for the expansion of existing business through the erection of new buildings and facilities on existing sites and premises. Currently the policy offers no support for the erection of new buildings where existing businesses are seeking to grow and expand, including the creation of new employment opportunities and also in circumstances to protect and retain existing jobs.</p>



	<b>Environment Agency Nick Wakefield Planning Specialist, Sustainable Places Team Environment Agency   Trentside Offices, Scarrington Road, West Bridgford, Nottingham NG2 5BR</b>		<p>Thank you for giving the Environment Agency the opportunity to comment on the Dunton Bassett Neighbourhood Plan - Submission for Examination.</p> <p>With consideration of the Environment Agency's environmental remit we have no adverse comments to make on the Plan as submitted.</p>