

Pre-Application Advice Report

Reference Number	PREAPP/ 20/00203	
Planning Officer	Mark Patterson, Strategic Growth Team Leader	
Site Address	Land adj HMP Gartree, Gallowfield Road, Market Harborough	
Proposal	Construction of a new Category C Resettlement Prison adjacent to HMP Gartree	
Relevant Planning Policies / Guidance	Government Documents	<p><u>National Planning Policy Framework 2018</u></p> <p>Section 4: Promoting Sustainable Transport Section 7: Requiring Good Design Section 11: Conserving and Enhancing the Natural Environment</p> <p><u>National Planning Policy Guidance</u></p> <p><u>Lubenham Neighbourhood Development Plan (2016 – 2031)</u></p>
Relevant Planning Policies / Guidance	Key Local Plan Policies	<p>Policy GD1 – Achieving sustainable development Policy GD3 – Development in the Countryside Policy GD5 – Landscape Character Policy GD8 – Good design in development Policy GI2 – Open space, sport and recreation Policy CC1 – Mitigating climate change</p>
Relevant History	There is no relevant planning history for the site subject to this enquiry, however, there is a significant level of planning history on the adjacent HMP Gartree since its opening in 1965.	
Key Constraints Affecting the Site	<ol style="list-style-type: none"> 1. Landscape Impact 2. Highway Network 3. Gas Main 4. Drainage 5. Heritage 6. Ecology 	
Planning Officer's Assessment	<p>1. Site Description</p> <p>The site in question lies immediately to the south of HMP Gartree (see Figure 1), a Category B men's Prison, which in turn, lies to the north west of Market Harborough and to the south of the village of Foxton (see Figure 2). A development of residential properties, previously staff housing for HMP Gartree, lies to the north and west of the existing prison. The site subject to this pre application enquiry comprises open greenfield land, but is not within an area designated as Greenbelt. The built form of Market Harborough is currently expanding towards the application site, with the North west Market Harborough Strategic Development Area currently under construction being approximately 700m to the east south east of the site (see Figures 2 and 4 and 5).</p>	

It is currently envisaged that the proposed site would be accessed via Welland Avenue (see **Figure 5**) which also serves the existing prison officers club and playing fields and the residential development to the north west of the site. Welland Avenue leads into Gallowfield Road which serves HMP Gartree. Gallowfield Road connects to the A4304 via Foxton Road and A6 via Gallowfield Road and Leicester Road (see **Figures 2 & 4**).

There are no listed buildings on the site or in close proximity to it. The site is not in a conservation area nor does it include or form part of a Scheduled Monument. The site does not lie in a 'sensitive area' for the purposes of Environmental Impact Assessment (i.e. SSSI, National Park, AONB, World Heritage Sites, Scheduled Monuments and European Sites). The site is not a designated Nature Conservation site (i.e. SSSI, local nature reserve etc.). There are two ponds on the site which will need to be tested for the presence of Great Crested Newts (GCN). The site is within an area at low risk of flooding from rivers or reservoirs (Flood Zone 1).

2. Description of Proposed Development

As set out in the applicants pre-application note, the proposal would provide a new Category C resettlement prison which would consist of:

- 7 houseblocks (see **Figure 7**), each occupying 240 prisoners; and
- Support buildings, including kitchen, workshops and a central services hub, totalling c.12,581qm (see **Figure 6**).

The applicants have stated that the house blocks will be 15m in height, whilst the other buildings will range from 5m -12m in height. Other development proposed includes kennels, allotments, car parking, perimeter fencing and a perimeter road for patrolling. The wider MoJ estate seek to achieve a BREEAM Excellent rating as a minimum on all new development and refurbishments and this includes new prisons and it is anticipated that any development on this site would follow this.

3. Principle of Development

Section 38 (6) of the Planning and Compulsory Purchase Act 2004 stipulates that in determining planning applications, determination must be in accordance with the development plan unless material considerations indicate otherwise. The development plan for Harborough District Council ('the Council') is the Harborough Local Plan 2011-2031 (adopted April 2019). This site also sits within the defined Lubenham Neighbourhood Development Plan area (see **Figure 3**), and as such, this also forms part of the Development Plan in this instance. The National Planning Policy Framework (NPPF) is also a material consideration in the determination of planning applications.

The Local Plan proposals map shows that HMP Gartree and the proposed development site are within the open countryside. A relatively small part of the site (the prison officers social club and playing fields) is allocated for open space Policy GI2 (see **Figure 10**).

The key development plan policies of relevance are as follows:

Policy GI2: states that the districts open space, sport and recreational facilities will be safeguarded and enhanced through improvements to their quality and use. Development which would result in the loss or reduction of defined open space, will not be permitted unless it can be demonstrated that:

- A robust assessment clearly demonstrates that the space or recreational facility is surplus to local requirements and will not be needed in the-long term in accordance with local standards; or
- Replacement areas will be at least equivalent in terms of quality, quantity and accessibility, and there will be no overall negative impact on the provision of open space in accordance with local standards; or
- The proposal is for alternative recreational provision which meets evidence of local need in such a way as to outweigh the loss.

Policy GD3: states that new development in the countryside will be permitted for a restricted number of uses (i.e. agricultural, horticultural uses etc).

Policy GD1: reiterates paragraph 11 of the NPPF in respect of sustainable development.

Policy GD5: states that development should be located and designed in such a way that it is sensitive to its landscape setting and character.

Policy GD8: states that development will be permitted where it achieves a high standard of design including meeting key criteria. Inter alia part e) states that development should be designed to minimise impact on the amenity of existing and future residents by:

- i. not having a significant adverse effect on the living conditions of existing and new residents through loss of privacy, overshadowing and overbearing impact, and
- ii. not generating a level of activity, noise, vibration, pollution or unpleasant odour emission, which cannot be mitigated to an appropriate standard and so would have an adverse impact on amenity and living conditions

Policy CC1: relates to mitigating climate change. The policy states that major development will be permitted where it can demonstrate (inter alia) the extent to which it meets relevant best practice accreditation schemes to promote the improvement in environmental and energy efficiency performance.

Policy CC3: states that new development should take place in the areas at lowest risk of flooding. The policy also identifies the need for a Flood Risk Assessment to accompany a planning application for major development.

Policy CC4: states that all major development must incorporate Sustainable Drainage Systems (SUDs).

Policy IN2: states that proposals should seek to maximise the use and efficiency of existing transport facilities and where necessary provide mitigating measures to deal with the impacts of development on the transport network, both within and outside the District.

The Lubenham Neighbourhood Development Plan states that the separation on Market Harborough from Gartree is important in order to maintain the rural setting and identity of the settlement. The application site is located partly within this defined Area of Separation. Policy LNP01 of the Lubenham Neighbourhood Development Plan states:

“The open character of the Lubenham & Gartree Area of Separation, as defined on Map 2, shall be maintained, to preserve a visual separation from the settlement of Market Harborough and retain the distinctive character and separate identities of Lubenham and Gartree. Development within this area will be permitted if (a) it would not diminish the physical or visual separation between built up areas associated with these settlements; and (b) it would not compromise, either alone or in conjunction with other existing or proposed development, the effectiveness of the Area of Separation in protecting the identity and distinctiveness of these settlements. Any development proposal within the Area of Separation must be accompanied by an analysis and proposals for mitigation of likely impact on settlement setting and the objective of visual separation, giving specific attention to use of location, design and landscaping appropriate to the character of the area.”

Map 2 as referred to in the Policy can be viewed at **Figure 5** below. Any future application must demonstrate that the proposals would not diminish the physical or visual separation between the settlements and do not compromise the effectiveness of the Area of Separation as set out in Policy LNP01.

The site promoters have set out how the current government is committed to building a strong and sustainable criminal justice system. In July 2019, the Prime Minister committed to recruiting 20,000 more police officers over three years. Increased police activity is likely lead to more arrests, charges, convictions and sentences, and the Prison Service will need to ensure there is sufficient capacity to hold these additional prisoners. In recognition of the impact an increase in police officers would have on demand for prison places, in August 2019 the Prime Minister announced up to £2.5bn be spent on building modern, efficient and decent prison places. The Prison Service will use this funding to deliver the objective of 10,000 additional places.

The Prison Service has identified Yorkshire, the North West and the South East of England as having the highest demand for prison places, linking directly to the large urban centres located there. In addition to this general need for new prison places in the South East, there is also a need to address the current imbalance between the needs of

prisoners and the types of prisons. There is currently an undersupply of c. 11000 category C resettlement places nationally highlighting the significant need for this new facility.

The site promoters have identified this site as a potential location for a new Prison due to there being sufficient land adjacent to an existing prison site within the applicant's ownership. This therefore negates land acquisition costs and timescales, as well as it being land the applicant is more informed of with regards to its history. This also allows for the benefits and efficiencies of co-location to be realised.

It must be pointed out that the proposal would constitute development in the open countryside and as such, would be considered primarily in the context of Policy GD3. Policy GD3 defines the types of development which are considered to be acceptable outside of the built form of Market Harborough (and other settlements) such as agricultural (or similar) uses, sports facilities, mineral and waste developments, renewable energy facilities. The provision of Prison facilities is not included within this list, and as such, the proposal would be contrary to Policy GD3 of the Local Plan. Notwithstanding this, due to the nature of the proposal, it is not unexpected that it is not included within the list of acceptable development, and, given the timeframes involved, both in the past and moving forward, it is not considered unreasonable that the site was not promoted as part of the Local Plan process, or that the site can not be promoted as part of the forthcoming Local Plan review process. As the applicants have set out, there is a pressing need for additional accommodation to be provided as soon as possible, and this would not fit within the Local Plan timetable.

For a Local Planning Authority to consider approving a proposal which is contrary to the Local Plan (particularly such a new Local Plan) any Applicants would be expected to provide a robust and convincing justification for the proposal, setting out why, when considered against the Development Plan as a whole, the proposal should be considered to be acceptable.

The Site Promoters have set out that the Prison Service has identified Yorkshire, the North West and the South East of England as having the highest demand for prison places, linking directly to the large urban centres located there. In addition to this general need for new prison places in the South East, there is also a need to address the current imbalance between the needs of prisoners and the types of prisons. It must be pointed out that this application site is located within the East Midlands, and as such, the demand for prison places in Yorkshire, the North West and the South East of England should have no bearing on the consideration of the proposal, and certainly should not be used as justification for proposing a new Prison facility on this site. Any justification should be based on the general need for prison spaces, and the specific reasons why this site is preferable to others being considered.

4. Heritage

There are no designated Heritage Assets on or adjacent to the application site. However, notwithstanding this, the former use of the site was as a WWII Airfield, and as part of the North West Market Harborough SDA development, archaeological remains associated with this use were discovered. As such, it is recommended that any future application should be accompanied by a Desk-based assessment of the heritage impact of the proposal, including that upon archaeological remains.

5. Highway Matters

The proposed access to the site is via Welland Avenue which leads into Gallowfield Road to the north east and Foxtan Road to the west (see **Figures 1 and 3**). In discussions at our pre-app meeting, it was stated that the applicants intend to ensure that all access to the facility comes via Foxtan Road into Welland Avenue, therefore avoiding traffic passing through the Gartree estate. Officers also raised the issue of the junction of Gallowfield Road / B6047 / Leicester Lane (see **Figure 2**) which is renowned locally as an "accident blackspot", and the potential for improvements at this junction were discussed in order to mitigate the impact of the development and also provide a very tangible public benefit to the local community.

As discussed at our meeting, whilst the signposted route to the existing HMP Gartree is via the A6 / B6047 / Gallowfield Road, there is significant anecdotal evidence from local communities that high levels of traffic currently rat-run a number of different routes, namely:

- 1) From the A6 / A427 roundabout, through Great Bowden, along Leicester Lane and subsequently onto Gallowfield Road (see **Figure 5**)
- 2) From the A6, through Foxton village
- 3) From the A4304, turning left in Lubenham and along Foxton Road (see **Figure 5**).

Whilst it is appreciated that it is very difficult to stop rat-running of this nature, this should be reflected in any adjustment to transport modelling, and such adjustments should be agreed with LCC Highways. Additionally, any mitigation which can be provided to minimise such rat-running should also be investigated. You should be aware that a traffic calming scheme through Great Bowden on the route described above was secured as part of the North West Market Harborough SDA, and any transport modelling and suggested mitigation should take account of this scheme

LCC Highways Officers were present at the meeting, and confirmed that the application would need to be accompanied by a full Transport Assessment. Due to the current Covid-19 situation, it is accepted that traffic levels are not at the same level as they were before prior to March 2020. As such, LCC Officers confirmed that the preferred approach would be to carry out surveys and then correlate these results against data that has been collected more recently. In order to do this, the applicant may wish to contact LCC's Network Data and Intelligence team at NDI@leics.gov.uk, as LCC is likely to also hold up-to-date counts, queue length videos etc. Officers consider that the cumulative impact of any additional vehicle movements, both during construction and operational phases, should be considered in light of any other existing, committed or proposed development in the area, including the ongoing North West Market Harborough SDA and the adjacent Airfield Business Park which are both still within their respective construction phases. You are strongly advised that the scope of any subsequent Transport Assessment and associated modelling should be agreed with the Highways Authority prior to you undertaking surveys. Additionally, any site access arrangements, off-site improvements etc should be designed fully in accordance with the Leicestershire Highway Design Guide/Design Manual for Roads and Bridges.

6. Design and Visual Impact

As already set out above, the proposed site is a greenfield site located in open countryside, albeit adjacent to an existing prison complex. As the site promoters have acknowledged, and as stated above, new development in this location is therefore contrary to the Local Plan (in particular Policy GD3).

The proposed development is set against the backdrop of the existing prison estate to the immediate north of the proposed development site, however, this in itself is not to be considered as a justification for the proposed development (see **Figures 8 and 9**). Any application will have to demonstrate that the proposal will not result in any significant demonstrable harm to the surrounding landscape. It is expected that any application will be supported by a Landscape and Visual Impact Appraisal, and Officers would welcome input into the selection of viewpoints which form part of this assessment.

Whilst the proposed development is of a significant scale, it is similar to that of the existing prison (see **Figures 8 and 9**), which, from certain viewpoints, will help mitigate the impact of the development. What will be key is minimising any additional impact. One feature of the site is that, being a former airfield, the site is very flat, and also very elevated. The existing site is highly visible from the surrounding area (see **Figures 8 and 9**), not just in the immediate vicinity, but also from further afield, and this must be assessed as part of the LVIA. Notwithstanding this, it is acknowledged that it would appear that the proposed site is on a slightly lower level than that of the existing facility (see **Figures 8 and 9**). It will also be of vital importance to assess the night-time visual impact of the proposal,

particularly given the impact created by the existing facility by virtue of the high level of lighting present at the site.

7. Ecology

Due to the current use of the site, there is potential for ecological assets to be present, particularly due to the presence of ponds both on and in the vicinity of the site. LCC Ecology Officers were not able to attend the meeting, but did provide comment in advance. The ponds to the east of the site have been used as receptor ponds for Great Crested Newts (GCNs) translocated from the Airfield Farm site and other developments in the locality. They are c. 250m from the development site, and therefore it should be possible to mitigate for any impacts on these ponds. However, there are several other ponds much closer, and one on site, which will need to be surveyed (it is in the zone marked 'carpark and circulation space'.) If GCNs are present in this ponds and others just on the boundaries, mitigation may involve creation of new ponds and translocation.

GCN surveys can be done in March – June. In the first instance, the ponds in question can be subject to a 'Habitat Suitability Index' assessment, which can be done now; this may scope them out of further survey. The approach to GCNs and planning is likely to change next year. Natural England are currently establishing a District-level Licensing regime in Leicestershire for GCNs, however, at this stage, Natural England have not provided any information regarding potential timeframes for this to progress. If this is in place before the application is submitted, it should be possible to offset any impacts on ponds through pond creation off-site – NE will implement this but the developer will need to provide funding for the offsetting. The advantage to the developer is that it may not be necessary to do surveys or on-site mitigation once this scheme is up and running.

8. Socio-Economic Benefits

The site promoters have stated that, based on the Prison Service's recent development at Wellingborough, it is anticipated that this new prison could create hundreds of jobs for local communities within the Harborough District Council area and beyond, particularly the nearby towns of Market Harborough, Corby, Kettering and Rugby in the build phase, and c500-600 jobs once operational. It is anticipated that, through the construction of new prisons, this will create opportunities for people to be trained and upskilled in construction skills and opportunities for businesses - helping boost the economy of Harborough District Council's administrative area and beyond. Harborough District Council would seek to secure a commitment from The Prison Service to ensure that a reasonable percentage of the workforce, both during the Construction Phase and the Operational Phase, are sourced from the local area, and also that, where possible, Apprentice and Graduate schemes are promoted. It is anticipated that this could be secured through a S106 obligation.

9. Flooding

The site is within an area at low risk of flooding from rivers or reservoirs (Flood Zone 1). Land in Flood Zone 1 is considered suitable for the development of all forms of land use. However, the site is at risk of surface water flooding due to the presence of a water source (stream/ditch) on the site. A drainage strategy should be submitted in support of the any subsequent planning application and this should set out how surface water will be adequately dealt with. I would strongly advise that you liaise with both the LLFA and Anglian Water as part of this.

Other Matters

Residential Amenity

As previously discussed, the application site is located adjacent to the former prison officers accommodation to the north of HMP Gartree. This residential development is now in private residential ownership, and as such, the potential impact of the development upon these residents needs to be fully investigated as part of any submission. There are three main ways in which the amenity of these properties could be affected:

- Construction impact

Any subsequent application should include an assessment of the impact of the construction phase of the development. This assessment should also include proposed mitigation measures that could be imposed to minimise the identified issues which, in turn, could be secured through the requirement for a Construction Method Statement to be agreed

- **Traffic Noise**

As discussed above, it was stated that the applicants intend to ensure that all access to the facility comes via Lubenham Road into Welland Avenue, therefore avoiding traffic passing through the Gartree estate. This is welcomed in order to help minimise the impact of traffic noise for the existing resident, however, in itself this also raises other potential issues. By closing off Welland Avenue at some point between the access to the new site and the residential development, residents of the development will effectively lose one route out of the estate, with all traffic from the estate having to go out towards the north east and on to Gallowfield Road rather than having the option to leave towards the south west and on to Lubenham Road. Any subsequent application should provide detailed of how this would be achieved as well as an assessment of the impact of this alteration upon the highway.

- **Overbearing impact**

Given that the closest residential properties are approximately 100m from the proposed development, it is unlikely that there will be any overbearing impact as a result of the development, however, any proposed layout should give thought to how any potential impact can be minimised through good design.

Gas pipeline

Officers are aware that there is a High Pressure Gas Pipeline adjacent to the south of the site which could represent a significant constraint to the layout of the scheme. It is also recommended that HSE and Cadent / National Grid are consulted regarding the proposed layout to ensure that they are satisfied that the pipeline does not represent a risk to employees or residents at the facility, and that the layout of the facility does not represent a risk to the operation and maintenance of the pipeline.

Public Benefits

As discussed in the Highways section of this report, it is imperative that any public benefits that can be attributed to the development can be tangible and accessible to the community. I have already discussed the opportunity for local workforce commitments and improvements to a locally notorious highway junction. As discussed at our meeting, a further measure which could be implemented would be the improvement of the public realm within the Gartree estate. This would provide an improvement to the environment within the closest residential area to the site, the very same area which will experience the greatest environmental impacts. This is further supported by Policy LNP07 of the Lubenham Neighbourhood Development Plan which states that new development at Gartree should make provision for additional community facilities or enhancements (such as improvements to roads and footpaths, play space or other community benefits at a level proportionate to the scale of the development. Policy LNP13 of the Lubenham Neighbourhood Development Plan would also support the installation of electric vehicle charging points at appropriate locations, such locations would not necessarily have to be on the application site, but could also be provided in public access areas for the benefit of residents as well as staff at the facility. As already discussed, the proposals would be considered to be contrary to the Local Plan, and as such, any enhancements to the local community which can be secured to offset the impact of the development will weigh in favour of the development and consequently add weight to any argument in favour of the proposal.

Public Consultation

As discussed at our meeting, due to the current Covid-19 situation, standard methods of public engagement are not going to be feasible. As such, I would recommend that you approach the Parish Councils of Lubenham, Foxton and Great Bowden as well as the Market Harborough Civic Society to establish how they would prefer to be engaged with. Regarding the wider community, I would suggest a mail drop in the surrounding area

	<p>providing details of a website where they can view the details, perhaps with some form of question and answer facility as well as a feedback form to enable people to provide comments on the proposal. I would also suggest that you liaise with the developers of the North West Market Harborough SDA, namely William Davis, Taylor Wimpsey and Davidsons.</p> <p><i>Environmental Impact Assessment</i></p> <p>It is recommended that a Screening Opinion is submitted to the LPA prior to the submission of any planning application to enable a full consideration of whether or not the development constitutes EIA Development. This is because, whilst the site is located in a semi rural location in the open countryside, the proposed development itself could be argued to consist of an Urban Development Project (Schedule 2, 10b), with an overall site area in excess of 5Ha (approximately 20Ha). Furthermore, whilst the development does not propose in excess of 150 dwellings, it would provide accommodation for approximately 1,700 residents.</p>
<p>S106 Requirements</p>	<p>Due to the nature of the development and the level of infrastructure which has recently been provided for in the vicinity of the site, it is not anticipated that there will be any significant S106 requirements for this proposal.</p> <p>As discussed above, it is anticipated that any S106 obligations would be around the following subjects:</p> <ul style="list-style-type: none"> • Mitigation of Highways impacts (related to both junction improvements and reduction in rat-running) • Public realm enhancements in Gartree to minimise impact of development on local environment • Local workforce provision <p>Notwithstanding this, Harborough District Council reserve the right to request additional S106 contributions over and above those set out above if requested by consultees and it is considered that they are:</p> <ol style="list-style-type: none"> a) necessary to make the development acceptable in planning terms; b) directly related to the development; and c) fairly and reasonably related in scale and kind to the development
<p>Additional Parties to Consult Prior to Submission of a Formal Planning Application</p>	<ol style="list-style-type: none"> 1. Leicestershire County Council Highways (hdc@leics.gov.uk) 2. County Ecologist (sue.timms@leics.gov.uk) 3. Lead Local Flood Authority (LLFA) (flooding@leics.gov.uk) 4. Anglian Water (planningliaison@anglianwater.co.uk) 5. Health and Safety Executive 6. Cadent (https://cadentgas.com/help-advice/digging-safely) 7. Lubenham Parish Council (clerk@lubenhamparishcouncil.org.uk) 8. Market Harborough Civic Society (cc.mortiboys@btinternet.com) 9. Foxton Parish Council (foxtonPC@outlook.com) 10. Great Bowden Parish Council (cllr.henwood@greatbowdenparishcouncil.org.uk) 11. Cllr Philip King (Council Leader) (p.king@harborough.gov.uk) 12. Cllr Paul Bremner (Lubenham Ward) (This is the Ward within which the site is located (p.bremner@harborough.gov.uk)) 13. Cllr Barry Champion (Market Harborough – Great Bowden and Arden Ward) (b.champion@harborough.gov.uk) 14. Cllr Dominic Fosker (Market Harborough – Logan Ward) (d.fosker@harborough.gov.uk) 15. Cllr Barbara Johnson (Market Harborough – Logan Ward) (b.johnson@harborough.gov.uk) 16. Cllr Phil Knowles (Market Harborough – Great Bowden and Arden Ward) (p.knowles@harborough.gov.uk) 17. Neil O'Brien MP (neil.obrien.mp@parliament.uk)

Validation Requirements

1. Completed application form
2. Appropriate Fee
3. 1:1250 or 1:2500 Location Plan
4. 1:200 or 1:500 Block Plan
5. 1:100 or 1:50 Proposed Elevations
6. 1:100 or 1:50 Proposed Floor Plans
7. Preliminary Ecological Assessment
8. Design and Access Statement
9. Noise Assessment
10. Heritage Impact Assessment
11. Flood Risk Assessment
12. Planning Statement
13. Transport Assessment
14. Landscape and Visual Impact Assessment, including photomontages as set out above

It is acknowledged that, for reasons associated with the security of the facility, not all of the submitted plans can be made publicly available. At our meeting, it was agreed that elevational details of the House Blocks would include the location and size of window openings, but not the technical detail associated with these. It was also agreed that floor plans of the House Block would be treated as Confidential and would not be made available to the public. If you are to submit any application moving forward, it would be greatly appreciated if you could include details of exactly which plans are to be treated as Confidential and not made publicly available.

Harborough District Council reserve the right to request additional plans / surveys / reports if it is considered necessary to allow a full and proper consideration of the proposal

Link to Planning Forms and Guidance:
<http://www.harborough.gov.uk/planning-forms>

Disclaimer

The above advice is based on officer opinion only and does not prejudice any subsequent decision of the Local Planning Authority pursuant to the submission of a formal planning application which may generate previously unknown issues either through responses to statutory consultations or evaluation of the more detailed information submitted with the application. The decision on a formal application may also be made by the Planning Committee which, democratically, is entitled to arrive at a different conclusion to the planning officers provided that decision is based on reasonable planning grounds.

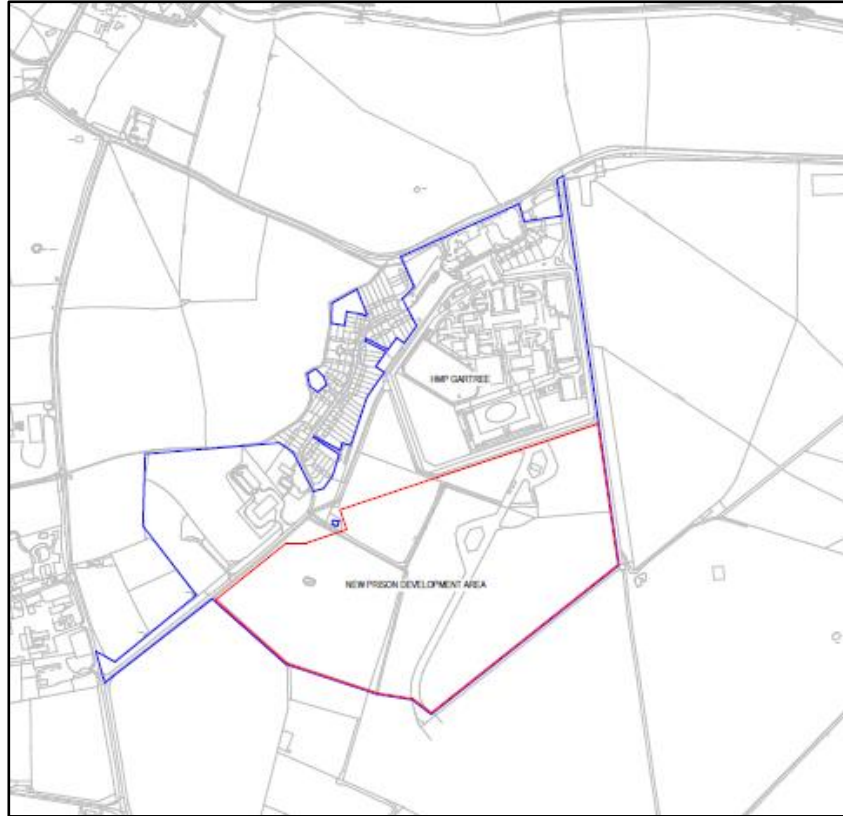


Figure 1: Site Location Plan

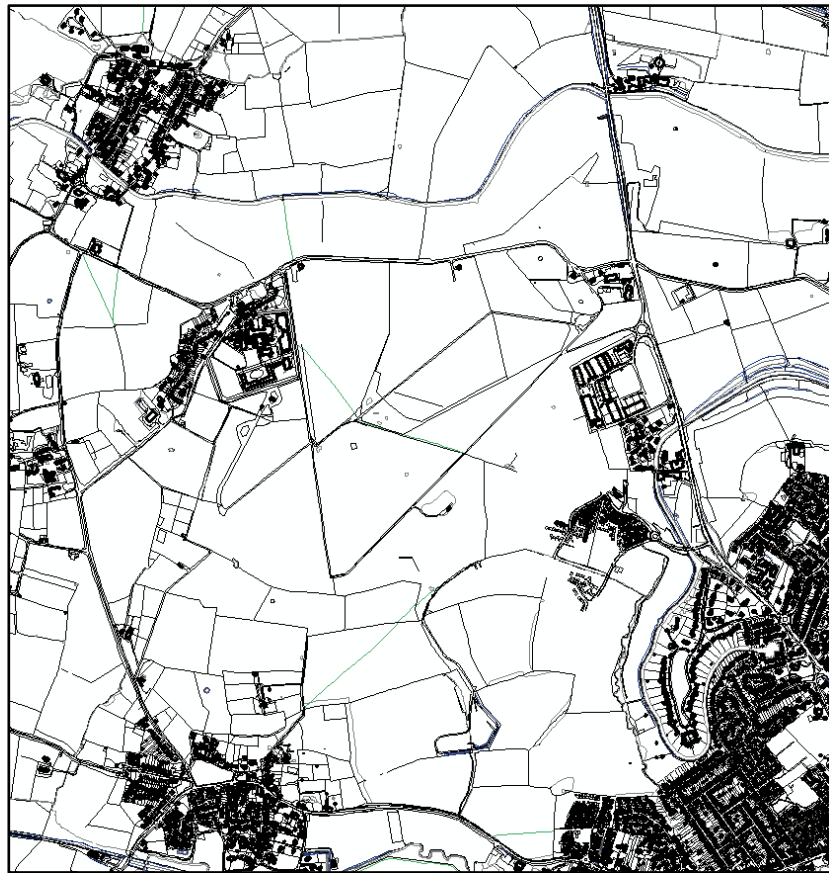


Figure 2: Contextual Site Location Plan



Figure 3: Site Aerial Photo

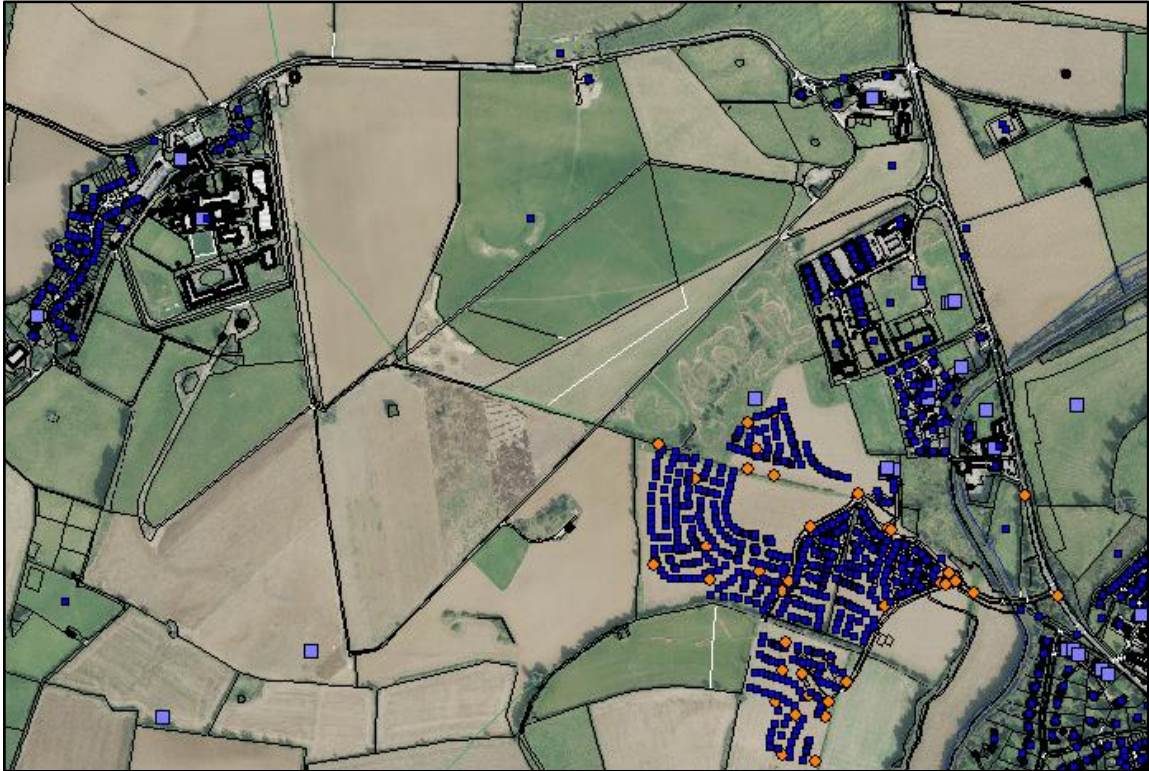
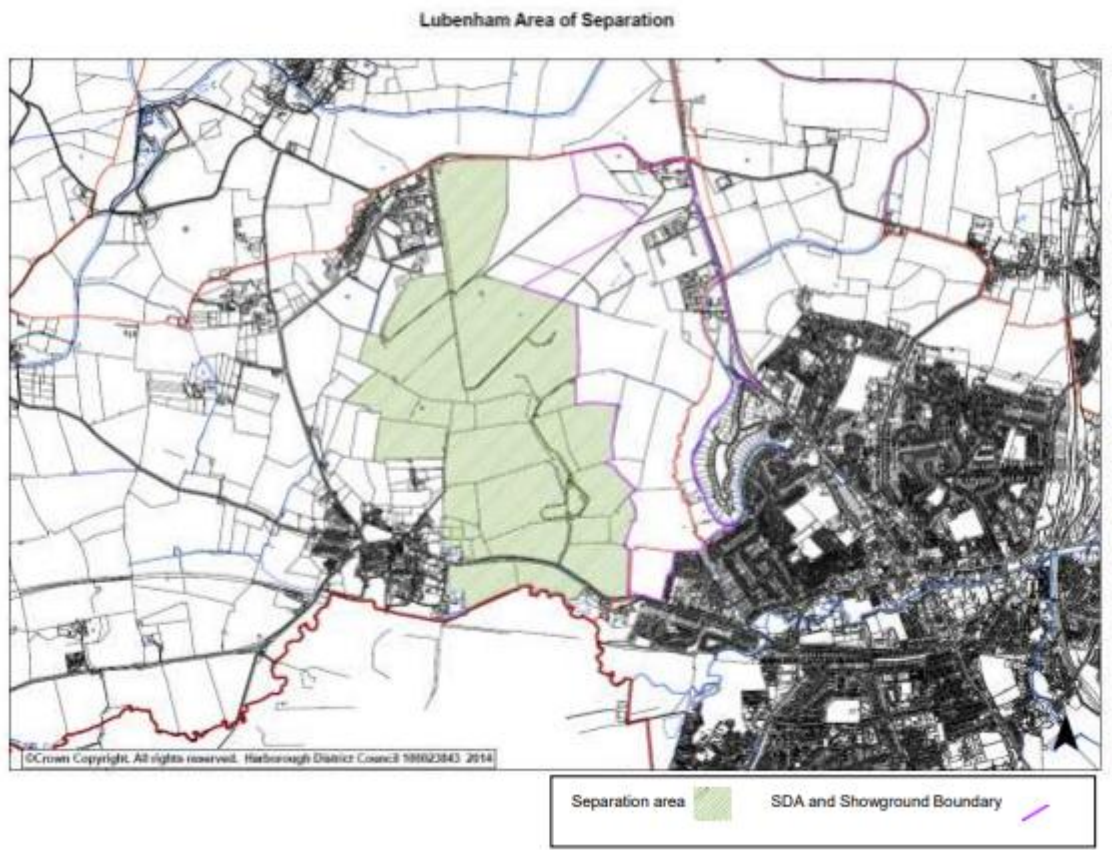


Figure 4: Aerial photo indicating proximity of site to NW Market Harborough SDA



Map 2

Figure 5: Extract from Lubenham Neighbourhood Plan indicating Area of Separation

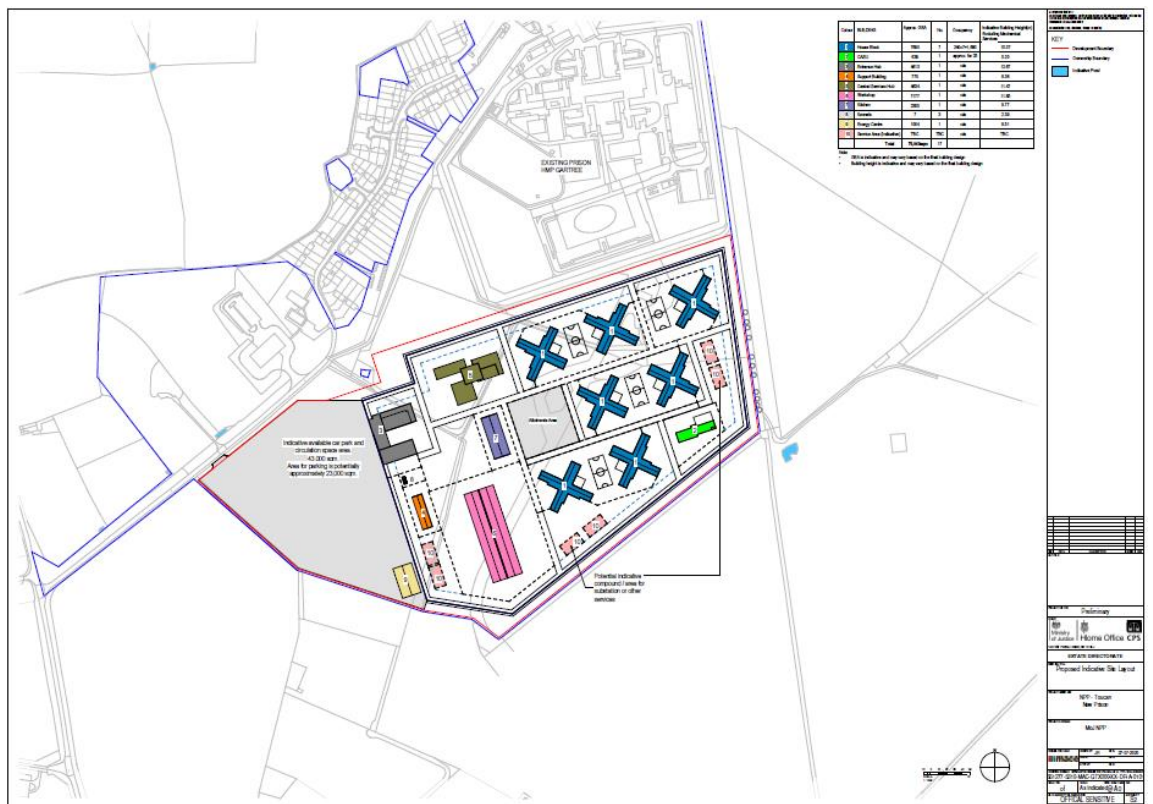


Figure 6: Proposed Indicative Layout

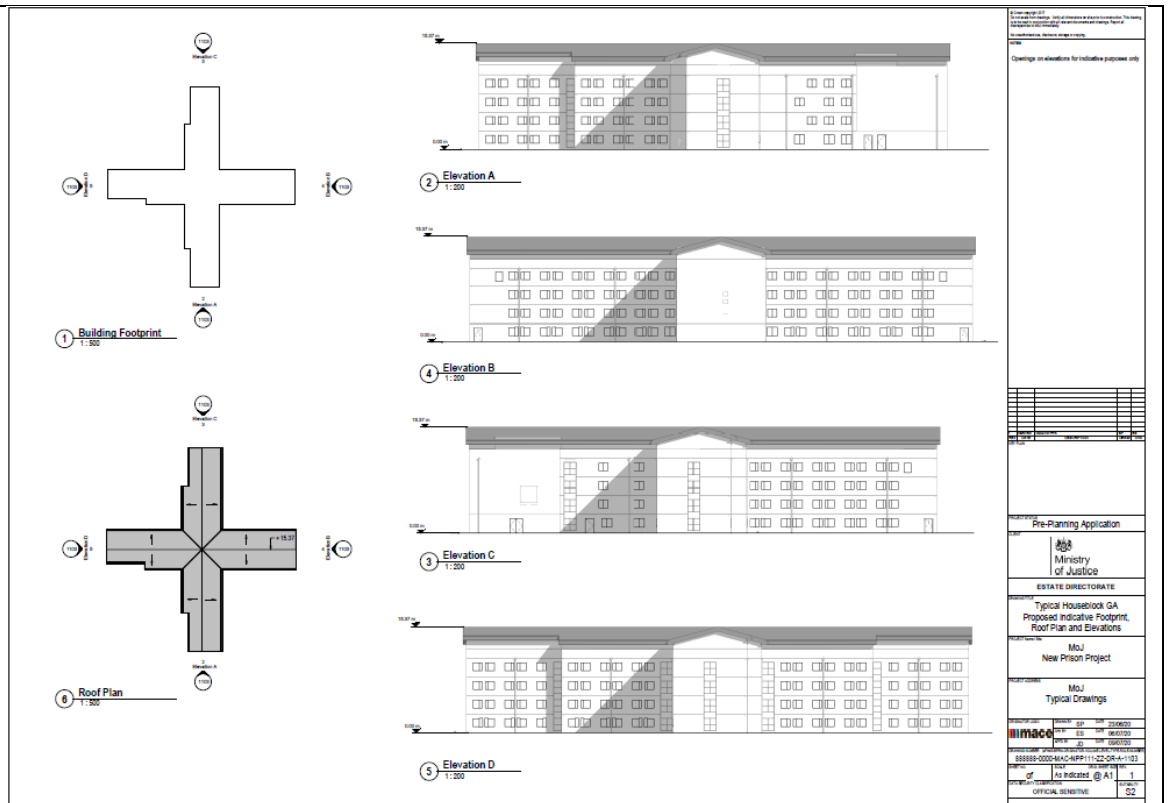


Figure 7: Indicative elevations of Proposed Houseblock



Figure 8: Site Photos (View from Foxton Road looking towards site and Welland Avenue)



Figure 9: Site Photos (View from Gallowfield Road, looking towards site an existing HMP Gartree)

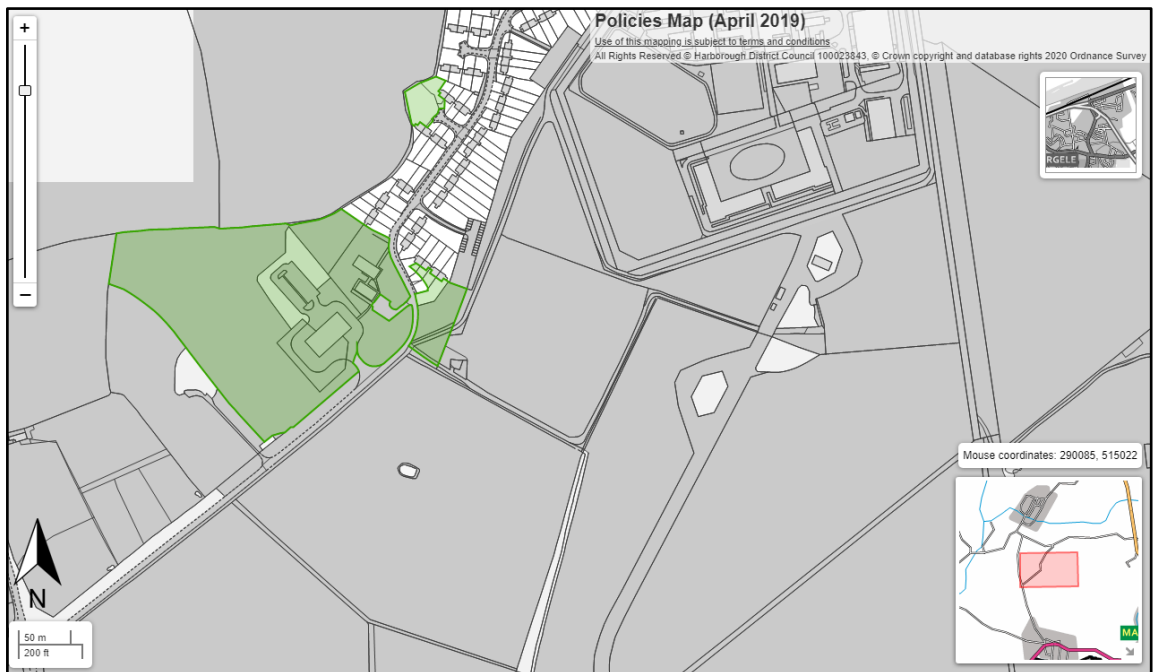


Figure 10: Local Plan Proposals Map extract