

Houghton on the Hill

Neighbourhood Development Plan 2025 – 2041

Consultation Response Grid



Houghton on the Hill Parish Council
Leicestershire

June 2025

Houghton on the Hill Neighbourhood Plan Review

Pre-submission Consultation Responses

Representor	Policy/ Paragraph/ Subject	Representation (excluding appendices etc.)	Comment	Amendment
1 National Highways	General Comments	<p>Many thanks for your correspondence dated 30th October 2024</p> <p>Further to your consultation below in relation to the above named planning application, please be advised that due to the distance of the site from the strategic road network National Highways has no comment to make.</p>	Noted	None
2 Environment Agency	General Comments	<p>Thank you for giving the Environment Agency the opportunity to comment on the Draft Revised Houghton on the Hill Neighbourhood Development Plan 2025 – 2041.</p> <p>We have reviewed the submitted documentation and from the perspective of the remit of the Environment Agency we have no adverse comment to make on the Plan as submitted.</p>	Noted	None
3 National Grid Electricity Transmission	General Comments	<p>National Grid Electricity Transmission has appointed Avison Young to review and respond to local planning authority Development Plan Document consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p><u>Proposed sites crossed or in close proximity to National Gas Transmission assets</u></p> <p>An assessment has been carried out with respect to NGET's assets which include high voltage electricity assets and other electricity infrastructure.</p> <p>NGET has identified that it has no record of such assets within the Neighbourhood Plan area.</p> <p>NGET provides information in relation to its assets at the website below. http://www2.nationalgrid.com/uk/services/land-and-development/planning-authority/shape-files/</p> <p>Please also see attached information outlining guidance on development close to NGET infrastructure.</p> <p><u>Distribution Networks</u></p> <p>Information regarding the electricity distribution network is available at the website below: http://www.energynetworks.org.uk/</p> <p><u>Further Advice</u></p>	Noted	None

		Please remember to consult NGET on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.		
4 National Gas Transmission	General Comments	<p>National Gas Transmission has appointed Avison Young to review and respond to Neighbourhood Plan consultations on its behalf. We are instructed by our client to submit the following representation with regard to the current consultation on the above document.</p> <p><u>Proposed sites crossed or in close proximity to National Gas Transmission assets</u></p> <p>An assessment has been carried out with respect to National Gas Transmission's assets which include high-pressure gas pipelines and other infrastructure. National Gas Transmission has identified that it has no record of such assets within the Neighbourhood Plan area.</p> <p>National Gas Transmission provides information in relation to its assets at the website below.</p> <p>https://www.nationalgas.com/land-and-assets/network-route-maps</p> <p>Please also see attached information outlining guidance on development close to National Gas Transmission infrastructure.</p> <p><u>Distribution Networks</u></p> <p>Information regarding the gas distribution network is available by contacting:</p> <p>plantprotection@cadentgas.com</p> <p><u>Further Advice</u></p> <p>Please remember to consult National Gas Transmission on any Neighbourhood Plan Documents or site-specific proposals that could affect our assets.</p>	Noted	None
5 Natural England	General Comments	<p>Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.</p> <p>Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made.</p> <p>Natural England does not have any specific comments on this draft neighbourhood plan.</p> <p>However, we refer you to the attached annex which covers the issues and opportunities that should be considered when preparing a Neighbourhood Plan and to the following information.</p>	Noted	None

		<p>Natural England does not hold information on the location of significant populations of protected species, so is unable to advise whether this plan is likely to affect protected species to such an extent as to require a Strategic Environmental Assessment. Further information on protected species and development is included in https://www.gov.uk/guidance/protected-species-how-to-review-planning-applications</p> <p>The plan may have environmental impacts on priority species and/or habitats, local wildlife sites, soils and best and most versatile agricultural land, or on local landscape character that may be sufficient to warrant a Strategic Environmental Assessment. Information on ancient woodland, ancient and veteran trees is set out in Natural England/Forestry Commission https://www.gov.uk/guidance/ancient-woodland-and-veteran-trees-protection-surveys-licences</p> <p>We therefore recommend that advice is sought from your ecological, landscape and soils advisers, local record centre, recording society or wildlife body on the local soils, best and most versatile agricultural land, landscape, geodiversity and biodiversity receptors that may be affected by the plan before determining whether a Strategic Environmental Assessment is necessary. Natural England reserves the right to provide further advice on the environmental assessment of the plan. This includes any third party appeal against any screening decision you may make. If a Strategic Environmental Assessment is required, Natural England must be consulted at the scoping and environmental report stages.</p>		
6 Resident	General Comments	<p>Stand-off on Main Street!...</p> <p>This week I witnessed one of many such occasions. A standoff on Main Street! This happens when 2 cars meet and one refuses to backup, thus gridlocking Main Street. It causes absolute chaos, with hooters, folk getting out of cars and shouting. Main Street cannot cope with any more traffic that would arise from the proposed Stretton Lane development. If the Stretton Magna development goes ahead, the traffic generating from that will obviously cause even more mayhem for Houghton on the Hill. The school corner is dangerous.</p>	If the Leicestershire Highways Authority has any concerns about the proposed development, they will make it clear through the consultation on the draft NDP.	None
7 Resident	General Comments	<p>The NDP focuses heavily on housing developments, further consideration should be given to supporting the local population to realise some of the suggestions in the comments from villagers this may not be in the scope of this plan, but HPC should consider ways to respond and support suggestions made to improve engagement</p>	The draft NDP includes a section of policies supporting services facilities and infrastructure.	None

		with villagers. There needs to be a long term plan for the sustainability of the current facilities in the village.		
8 Resident	General Comments	It has been carefully researched and written	Thank you.	None
	Policy L2	Fully agree that we should have an area of separation	Agreed.	None
	Policy L3A	In agreement	Thank you.	None
9 Resident	General Comments	<p>I find the documents detailed and comprehensive.</p> <p>Personally, I would stress more the need for housing that allows older people to move into smaller dwellings but remain in the village. This would also enable young families to move into the village.</p> <p>I like the notion of Houghton being a village and the need therefore for separation from the Leicester/Thurnby/Bushby conurbation.</p> <p>Infrastructure is a key issue, particularly with regard to transport and access.</p> <p>As a separate point the position and age of the school need to be urgently considered as part of any future development.</p>	<p>Thank you for these comments.</p> <p>Policy H1 promotes the need for smaller homes to meet the needs of older residents and young people.</p> <p>The draft NDP includes a policy supporting infrastructure.</p> <p>The school was consulted and is referenced in the plan</p>	None
	P49	I would support this very strongly.	Noted	None
	P50	Sums up my feelings completely.	Noted	None
	P54	Provision of smaller high quality dwellings is therefore required as identified in paragraph 55	Agreed – this is reflected in Policy H1.	None
	Policy L3A	I would support this as a development choice as it potentially has the least effect on current housing, in comparison with L3B & L3C. However, we need to remember our responsibility to others, who like all of us, would want to move to this beautiful village. Most houses in the village do not have open views but people live here quite happily.	Noted.	None
10 Resident	General Comments	<p>Very impressed by analysis of issues and dedication of the teams commitment.</p> <p>Agree with policies.</p>	Thank you.	None

	9.1	much appreciate junior football now provided but exacerbates Sat & Sunday morning parking problems in Weir Lane and Firs Rd when playing field parking area becomes full.	Noted	Reference to car park added to Policy S3
	6.2	Totally agree, insufficient provision for downsizing for the elderly.	Noted	None
11 Resident	General Comments	<p>I appreciate there has been a huge amount of work put into this and thank those who have given their time and effort.</p> <p>The issue of housing development dominates the plan and was the main topic for discussion at the meeting at the village hall on 12 November – perhaps as it should be. I am supportive of new housing developments and think that the suggested sites are all reasonable. Many Houghton residents who oppose housing developments occupy homes which have been built in the last 50 years. We need new houses which suit younger people and are affordable to try to address the lack of opportunities for young people to become home owners. Families do not want to live in homes built on brownfield sites in cities. We should grasp the opportunities that housing developments bring to ensure they are accompanied by appropriate facilities and infrastructure. However, I do not believe that the current system of s106 grants the correct approach for this. It is too reliant on efforts from individual or organisations rather than demonstrating any joined up thinking.</p>	Thank you for this thoughtful comment.	None
	Section 6.5 Services and Facilities	I am not sure if this is in the remit of the Neighbourhood Plan, but I suggest that thought needs to be given to how some of the facilities in the village are funded. I don't think it is sustainable in the long term that what are essentially public facilities (e.g. village hall, recreation ground and pavilion building) are managed and run by volunteers and are funded by the efforts of a small group of supporters rather than the whole community. It is disappointing to see in the community questionnaire that more than half of those who answered Q33 were either not willing to pay anything or no more than £10 per year to fund improvements to facilities.	This issue is outside of the scope of this NDP, as the hall and the field are run by independent charities. Section 106 developer contributions may be available to assist them in the future.	None
12 Resident	Church barn site	<p>With regards to land, set back from Main Street, Houghton on the Hill and adjacent to the Church. I would like to register my agreement with the following statement:</p> <p>"Questions 18.1 and 18.2 of the Community Questionnaire recorded that over half of the respondents supported the development of the barn site (owned by St Catharine's Church) with planning permission for a few smaller bungalows. I note that this site was not included in the allocation in the current draft of the Neighbourhood Plan. I wholeheartedly support the moving of the development boundary in order to facilitate the sale of this land and thereby realise the capital</p>	While the community response to these proposals was generally favourable, insufficient information was provided within the necessary timescales to enable the site to move forward.	None

		needed to sustain and develop the church as a Heritage Asset, under paragraph 203 of the National Planning Policy Framework (NPPF).”		
13 Resident	Church barn site	Questions 18.1 and 18.2 of the Community Questionnaire recorded that over half of the respondents supported the development of the barn site (owned by St Catharine's Church) with planning permission for a few smaller bungalows. I note that the site was not included in the allocation in the current draft of the Neighbourhood plan. I wholeheartedly support the moving of the development boundary in order to facilitate the sale of the land and thereby realize the capital needed to sustain the Church as a Heritage Asset under para 203 of the National planning Policy Framework (NPPF)	While the community response to these proposals was generally favourable, insufficient information was provided before the Regulation 14 Consultation commenced.	None
14 Resident	General Comments	<p>I cannot refer to the document, as I do not have them to hand and have found difficulty in accessing them online. I want to make 3 points.</p> <ol style="list-style-type: none"> 1. The production of the documents is superb and the work involved extremely professional, and the community should be erroneously grateful for all the work undertaken voluntarily. 2. At the entrance and exit to the village on the A47 by the turning to Deangate Drive, my car radio encounters interference, and I lose sound. I am concerned that radio interference of that sort might impact on residents a new homes in that area. 3. The redundant barn by the church field is an eyesore and it would appear incontestable that a suitable dwelling there would be a real enhancement. It seems obvious that a slight boundary change would benefit the whole community. 	<p>Noted. Thank you.</p> <p>All new homes are required to have access to superfast broadband and this will help to ensure good connectivity. While the community response to these proposals was generally favourable, insufficient information was provided before the Regulation 14 Consultation commenced.</p>	None
15 Resident	General Comments	The plan needs to be amended to remove any development that adds additional traffic to both Stretton Lane, Main Street and St Catherine’s way. Stretton Lane is already extremely busy with one of the worst bends in the County and by adding any additional traffic through the village makes no sense and will add to what is already dangerous.	The Highways Authority will make comment about the suitability of additional traffic in any given location. If they	None

		The final document must accurately represent the recently stated views of the village residents and must not support any development that will put more traffic down Main Street and St Catherines Way	support the proposed development, we have to accept its suitability as a development location.	
16 Resident	General Comments	The plan should be amended to avoid any new houses that will inevitably add traffic both on Stretton Lane and St Catherines way. This area is already congested and dangerous to car and pedestrian users and even more so during school pickup and drop off times. I would recommend that someone from the neighbourhood planning team actually spends time on Stretton Lane where the bend is to experience it for themselves. Please see sense...	The Highways Authority will make comment about the suitability of additional traffic in any given location. If they support the proposed development, we have to accept its suitability as a development location.	None
17 Resident	General Comments	I object to the planning application for dwellings on Stretton Lane. Traffic through the village is already a problem. More houses at this end of the village will make the situation worse, due to increased number of journeys being made by the new occupiers, and the location itself couldn't be worse, as is already congested, is close to two sharp bends, one of which is in a 60mph zone.	The Highways Authority will make comment about the suitability of additional traffic in any given location. If they support the proposed development, we have to accept its suitability as a development location.	None
18 Houghton Bowls Club	NDP consultation 8.2 (197) Commercial Services.	There is no mention of the garage/shop, the old Sunnybrae garage or the chip shop.	This section will be updated to be more inclusive	Change made as indicated.
19 Resident	General Comments	I commend the hard work that has gone into the preparation of the plan and the design guide. I fear the ambition will end up not being matched with any of the actual developments, not least because The Government have not chosen to give teeth to some of the standards set out even though most have been set out in documents produced by the construction industries, but at least those involved have tried!	Noted	None

		I am in general agreement with all the Policies in the Draft Plan.		
	Church barn site	<p>I have been pleased to note considerable text which I believe supports in general terms the case which can be made for the possible development of Church Barn, “Site J” including the following:</p> <p>Policy D3, page 42</p> <p>Policy EM3, page 46</p> <p>Policy S1 page 48 for which, I suggest all the NDP objectives listed would form a significant part of the case for supporting Development of Site J in the way to which the PCC of St. Catharine`s Church aspires.</p> <p>Policy S3a)i. page 50</p> <p>The AECOM assessment of Site J referred to on page 78 in Appendix 5 paragraph 226 and Para 42, page 9</p> <p>I earnestly hope that the Council will in due course support the endeavour of St. Catharine`s PCC, not only for the benefit to the church community, but for the ambition to improve what St. Catharine`s can do to benefit our village and its school.</p>	While the community response to these proposals was generally favourable, insufficient information was provided before the Regulation 14 Consultation commenced.	None
	Page 65 para 8.2,	It will not surprise you that I have focussed on this one issue, but I have one separate comment related to Para 8.2, page 65 and suggest that Funnels Garage, the BP Filling Station and store, the former “Sunnybrae” site now used as a car sales facility and the former Harding`s general store, now a fast food outlet, need to be added for completeness. Even if there are good reasons for not doing this, I include the comment to show that I have read the draft quite thoroughly and that my opening paragraph above is not a shallow expression of my opinion!	This section will be updated to be more inclusive	Changed as indicated.
20 St Catharine’s Church	Church barn site	<p>I see from the draft Neighbourhood Plan that some of the land owned by St Catharine’s Church, in particular the barn site, falls outside the development boundary as currently defined by the Plan. It is very important for the maintenance and future development of the church that the barn site be included within the boundary so that it is part of the area scheduled for development and can be sold with planning permission for possibly two houses or several smaller dwellings, thereby realising the maximum possible income for the church.</p> <p>I fully support the moving of the development boundary in order to facilitate the sale of this land.</p>	While the community response to these proposals was generally favourable, insufficient information was provided before the Regulation 14 Consultation commenced.	None
21 Resident	Church barn site	Questions 18.1 and 18.2 of the Community Questionnaire recorded that over half of the respondents supported the development of the barn site (owned by St Catharine’s Church) with planning permission for a few smaller bungalows. I note	While the community response to these proposals was generally	None

		that this site was not included in the allocation in the current draft of the Neighbourhood Plan. I wholeheartedly support the moving of the development boundary in order to facilitate the sale of this land and thereby realise the capital needed to sustain and develop the church as a Heritage Asset, under paragraph 203 of the National Planning Policy Framework (NPPF)	favourable, insufficient information was provided before the Regulation 14 Consultation commenced.	
22 Resident	Church barn site	Questions 18.1 and 18.2 of the Community Questionnaire recorded that over half of the respondents supported the development of the barn site (owned by St Catharine's Church) with planning permission for a few smaller bungalows. I note that this site was not included in the allocation in the current draft of the Neighbourhood Plan. I wholeheartedly support the moving of the development boundary in order to facilitate the sale of this land and thereby realise the capital needed to sustain and develop the church as a Heritage Asset, under paragraph 203 of the National Planning Policy Framework (NPPF)."	While the community response to these proposals was generally favourable, insufficient information was provided before the Regulation 14 Consultation commenced.	None
23 Resident	Church barn site	With reference to Questions 18.1 and 18.2 of the community questionnaire, I note that the site of the barn owned by St. Catharine's Church is not included in the current draft of the Neighbourhood plan. I wholeheartedly support the moving of the development boundary in order to facilitate the sale of this land and thus realise the capital needed to sustain and develop the Church as a Heritage Asset.	While the community response to these proposals was generally favourable, insufficient information was provided before the Regulation 14 Consultation commenced.	None
24 St Catharine's Church	Church barn site	<p>We are very grateful for all the hard work, time and energy that has gone into producing this excellent document. Our comments relate to the exclusion of Site J (the church barn site) as one of the allocated sites for development. We would gratefully ask that this be re-considered and site J be included in the list of allocated sites to allow for future development.</p> <p>As comments and submissions we would raise the following points:</p> <ol style="list-style-type: none"> 1. We have provided suitable evidence in the form of an extract of the will of William George Davis and confirmation from the relevant Solicitors, that any proceeds of sale will indeed be for the benefit of St Catharine's Church. This was at the request of the Neighbourhood Plan Working Group. 	While the community response to these proposals was generally favourable, insufficient information was provided before the Regulation 14 Consultation commenced.	None

		<p>2. We will also endeavour to provide plans for the site and proposed building footprints, for 2 dwellings. This has not been possible to attach with this due to the deadline in submission of these comments.</p> <p>3. Our rationale for requesting our site to be allocated as one for development is to raise funds for the work and ministry of St Catharine's church into the future. Any such funds would therefore, be used to recognise, sustain and develop the Church as a Heritage Asset in accordance with paragraph 203 of the National Planning Policy Framework (NPPF) sections a-c or paragraph 210 of the new NPPF. The funds could be used to enhance, develop and improve the current building (re-ordering) but also to help fund in part the provision of a Vicar.</p> <p>4. Possible uses of any funds (these are options at present) could be:</p> <ul style="list-style-type: none"> • A more welcoming, flexible and useable space for both the church congregation and local community. This would be achieved by removal of the pews which would be replaced by chairs. Removal of the pews is essential since they are increasingly becoming unsuitable and dangerous to sit on. Examples of community uses would be for the school who increasingly use the church but are limited by the current layout and developing the number of concerts that happen in the village. • A new kitchen facility which would enable more activities to be run in the church that centred on providing food. This could also have the capacity to run as a café to operate during the week, offering something different to existing provisions whilst not detracting from their importance and place. • A new floor which would have underfloor heating installed. This would be the most efficient and environmentally friendly way of heating the church. • A new audio-visual system which would benefit Sunday morning services as well as being useable for community events, such as concerts. • Improved access to the front and rear of the church building which would especially benefit those with mobility issues. • A more welcoming front door to the church building. • If a full re-ordering is not currently feasible we would hope at the very least to remove a portion of the pews at the back of the church to create a smaller more flexible area. This could be used to run groups such as a bereavement support group. • Helping towards the cost of external stone work on the tower. • Funds could also be used in a tapered manner to help fund the provision of a Vicar for the years to come. This is potentially needed due to the changing nature of Parish Ministry in Leicester Diocese. The continued presence of a Vicar greatly benefits the village in providing essential emotional, spiritual and practical support to those who come to church and those who do not. 		
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		<p>We would also suggest that our proposed development is in line with the majority of the policies of the draft neighbourhood plan as evidenced below:</p> <ol style="list-style-type: none"> 1. Page 9 point 42 and page 78 paragraph 226 reference the Site Options and Assessment Report. This report states “the site is potentially suitable for housing and therefore potentially appropriate for allocation in the Neighbourhood Plan,” and (...) is in a relatively sustainable location (...). Furthermore “any development proposal will have to conform with the character of the Conservation Area (...)” This would be our intention as we work with an Architect on potential designs to ensure that any development would be designed sympathetically to the neighbouring conservation area. 2. Policy D3 page 42. An existing plan for a 1 bedroom dwelling received no objection from the barn’s immediate neighbours. 3. Policy EM3 page 46. Our proposal complies with all the criteria for re-purposing an agricultural building. In fact, when we have consulted the neighbours to the barn, in relation to a previous planning proposal, they were keen for the barn’s removal. 4. Policy S1 page 48. Any proceeds of sale from the barn site would be used for the benefit of St Catharine’s church to safeguard future ministry in the village. 5. Policy S3 a(i) page 50. Again, this is a policy recognising the importance of the churches in Houghton and their improvement. 6. St Catharine’s Church is a key community facility as evidenced in Appendix 8.1.8. Any proceeds of sale can be used to protect, sustain and enhance St Catharine’s church in its vital community role. <p>In light of the all the above we would request that site J be included in the potential list of allocate sites for development.</p>		
25 Houghton Field Association	General Comments	<p>HFA understands and supports the need for proportionate housing development. We need new houses which suit younger people and are affordable to try to address the lack of opportunities for young people to become home owners and remain in the village or move here. Families do not want to live in homes built on brownfield sites in cities. We should grasp the opportunities that housing developments bring to ensure they are accompanied by appropriate facilities and infrastructure.</p>	Noted	None
	Section 6.5 Services and Facilities.	<p>The current model for supporting what are essentially public facilities (e.g. village hall, recreation ground and pavilion building) is probably not sustainable in the long term. Thought needs to be given by the local district and parish councils as to how these can be funded through council tax/precept.</p>	<p>This is beyond the scope of the Neighbourhood Plan. Policy S3 identifies the priority for infrastructure projects.</p>	None

26 Sport England	Policy L6 Important Open Spaces for Sport and Recreation	Sport England welcomes the inclusion of the playing fields and sports facilities in Houghton on the Hill in this policy. Paragraph 104 in the National Planning Policy Framework (2024) states that playing fields should not be built on unless one of three criteria apply.	Noted	None
	Policy S3: Infrastructure	Sport England welcomes the inclusion of improvements and/or enhancements to the village sports and children's facilities in this list.	Noted	None
27 Historic England	General Comments	<p>Thank you for consulting Historic England regarding the Houghton on the Hill Neighbourhood Plan.</p> <p>The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.</p> <p>If you have not already done so, we would recommend that you speak to the planning and conservation team at your local planning authority together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes.</p> <p>Some Historic Environment Records may also be available on-line via the Heritage Gateway https://www.heritagegateway.org.uk/Gateway/</p> <p>It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan. Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:- https://historicengland.org.uk/advice/planning/plan-making/improve-yourneighbourhood/</p> <p>You may also find the advice in "Planning for the Environment at the Neighbourhood Level" useful. This has been produced by Historic England, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information.</p>	Noted	None

		We refer you to our published advice available on our website, “Housing Allocations in Local Plans” as this relates equally to neighbourhood planning.		
	Site allocation L3B	<p>We note that the draft plan appears to propose site allocations. The site allocation L3B is located within the setting of Houghton on the Hill Conservation Area. Development of the site has previously been refused and dismissed at appeal. In the decision, the planning inspector noted that Notwithstanding the wide swathe of open land to the south of the village within the Conservation Area, to my mind the appeal site and the wider open countryside to the west also forms part of the attractive landscape setting of the village which contributes to the character and appearance of the settlement’ and concluded that.....the proposal would have a harmful effect on the character and appearance of the area and the setting of the Houghton on the Hill Conservation Area and would undermine the significance of this heritage asset.</p> <p>We therefore consider that an Historic Impact Assessment should be undertaken to understand the potential impact of proposed development of the site as this could be a possible objection to inclusion in the Neighbourhood Plan. In the event that the site is continued to be proposed as an allocation, we draw your attention to the previous appeal decision on this site. We also suggest that any archaeological implications are discussed with the County Archaeologist. If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me.</p>	Noted	None
28 Houghton on the Hill Village Hall	General Comments	<p>We support the policies particularly ones with respect to the protection of the village hall and its land.</p> <p>At a recent meeting of the village hall trustees, we acknowledged how much work and effort has gone into producing this document.</p> <p>I would appreciate the information on the hall being slightly changed and I have attached the information to this sheet. I can also e-mail that to the Clerk of the PC.</p>	Agreed	Changes have been made.
	8.1.5 Houghton Village Hall	<p>The village hall stands on Main Street near to St Catherine's church. The land was given to the village and a separate financial donation by a local resident enabled the hall to be built in 1921. Since then, it has been considerably adapted with outbuildings and extensions added to the north side on the hall and a porch with toilet facilities put on the front.</p> <p>The hall and land is held in a charitable trust as a space for exercise, education and social activities and is managed by a team of trustees (UK registered charity number 521432). The building is primarily for community use in the village. There are several</p>	Agreed	Changes have been made.

		regular activities such as WI, yoga, karate and children's play groups. Every Friday a free community coffee morning takes place between 10:00 AM and noon. The hall is also available for hire for events such as children's birthday parties and village fund raising events. Houghton Bowls club is based at the village hall.		
	9.1 202	Development Plan 2024 Appendix 2. With reference to a coffee bar or facility for the young people. Paragraph 202 reads slightly as though the VH or HFA could offer the 'Coffee Bar' themselves. Please could it be rephrased to suggest that there are some appropriate venues if members of the community wanted to set up a group/event for the teenagers to go to.	Agreed	Changes have been made.
29 Resident	General Comments	We feel that the documents written by the parish council have been biased towards keeping any development away from the position of the A47 to the main village. Through consultation, the majority vote was for site F near Ingarsby Drive, however the parish council appeared to have ignored this without clarification from the highway authorities regarding speed reduction which should be relevantly easy implementation. Stop	All sites were assessed following a standardised methodology, including Site F.	None
	Paragraph, page 4, Fig1 Sites D and C.	With the recent development of Ashlington Fields we purchased our property for over half a million, our 3 Storey property would overlook the proposed development which would in turn preach our privacy, possibly lack of light. Currently we struggle to get on the A47 during peak hours. This would potentially increase with the proposed new development, these would also be potential for more accidents and back tailing traffic. The bridleway between sites C & D would also be to degraded for current pleasant walks and views.	Noted	None
	Ref page 22, Fig 2-19	Access to developments has already caused issues with narrow roads and pavement parking. This type of oversight is a potential invitation for road accidents and casualties for pedestrians.	Widths of roads within developments are controlled by planning regulations and are outside the scope of an NDP.	None
30 Resident	General Comments	Requirements relating to design of developments must be emphasised and enforced. Buildings should fit in with existing properties and of a non uniform design. Houses must not be fitted into too smaller space. Every effort should be made to minimise traffic through village Allowing developments to north of A47 reducing need for traffic through village	All of these issues are addressed in the NDP and VDG&C.	None

		<p>There is a large percentage of elderly, many not ready for assisted living. The needs of this group are being ignored. There is a desperate need for more bungalows to be built and of course for handicapped too.</p> <p>This would go some way to alleviating traffic problems; fewer journeys at peak times.</p>		
	2-5 52	A mix of styles avoiding monotony and reflect distinctiveness of village. Application 24/00359/Ful has totally flouted this guidance. Please address issues with developers showing contempt for village guidelines.	Noted. These issues are addressed in the NDP and VDG&C.	None
	2-7 74 & 75	This appears to encourage Co use of footpaths by pedestrians, pram, wheelchair and mobility scooters and cyclists. This is a recipe for disaster. E bikes/scooters motioned wheelchairs etc mingling with pedestrians is a definite no no, it is highly dangerous.	The improvement and extension of the network of footpaths is a key objective of the NDP.	None
	L1 & L3 B	<p>Site E should not be included in the settlement boundary.</p> <p>The questionnaire showed that it was not a popular choice and not third (as stated) but 5th. It must be removed! The car park was never discussed with residents and is equally unpopular. It is of no benefit to the community, could make the already dangerous traffic situation even worse. It has huge potential to be an area of anti-social behaviour and criminal activity. It too must not be included, it is a dangerous prospect for the South end of the village.</p>	The developer is proposing this as a rural exception site and as such it does not need to be within the Settlement Boundary and cannot be allocated within an NDP.	The Settlement Boundary has been adjusted and the site allocation removed.
31 Resident	General Comments	<p>The proposed plan has not allocated any sites for 'self-build' houses to meet local need within the development boundaries. If such sites therefore do not exist it indicates the proposed boundaries are unreasonably restrictive.</p> <p>The new planning guidance previewed this week emphasises the critical need to use redundant developed sites for housing.</p> <p>This failing to allocate sites for 'self-build' houses inside the village is unfortunately a continuation of the previous village plan. No 'self-build' homes having received approval within Houghton during the last 5 years (unlike neighbouring villages). *</p> <p><i>'the proposed plan needs to address identified requirement for self-house building and ensure enough plots with suitable permission some through'</i></p> <p>Failure to allocate sites and take national policy into account may very well lead to Harbourough District Council granting planning permissions for self-build homes outside the development boundary.</p>	Opportunities now exist for self-build applications.	Infill and windfall policies.

		<i>*the actual figure may be well over 10 years.</i>		
	Site L	<p><u>Assessment of potential development sites – Site L</u></p> <p>The decision regarding the site is incorrect - there are significant errors and insufficient weight has been given to valid arguments for the proposal. It fails to recognise the very real need to provide sites for ‘Self-Build’ conflicting with national and Harborough District Council policy. New national planning guidance published this week stresses the ‘critical’ need to reuse redundant developed sites for housing.</p> <p><u>Errors</u></p> <p>The buildings on the site are not ‘agricultural’ - this was made clear in the original proposal. They were given planning permission in 1948. This has been confirmed in a search by the solicitors Wartnaby Hefford. The original use was as an employment site and as a workshop/garage. This therefore qualifies the site as ‘Brownfield’. The site should always have been included in the Village Development Area.</p> <p>That historic approval <i>‘demonstrates it was considered that development on the site was appropriate to the character of the landscape and local area’</i> The site was developed before approximately 80% of the rest of Houghton and was always a part of the village. The previous decision regarding the development line was arbitrary and lacking historical context and this has continued into the new proposed plan.</p> <p>Re: Precedent – <i>‘could set a precedent for other development in the Conservation Area’</i> – Re-Development of an existing permitted development does not set a precedent for future development.</p> <p>The possibility of further development beyond the garden line to the rear of Main Street is very unlikely and has been exaggerated: the field to the left is historic ‘ridge and furrow’ and would not gain planning approval, to the right (up to the church) vehicular access is extremely limited. The proposed site has good vehicular access and would <i>‘certainly’</i> receive ‘Highways’ approval (Opinion Expressed by Consultancy Firm who pointed out; Split access onto Main Rd, 20mph Speed Limit & Traffic Calming).</p> <p><u>Disagreement with following statements:</u></p>	<p>The site assessment was undertaken by a professional third-party organisation who are specialists in this area of work.</p> <p>Alternative sites were considered preferable for allocation.</p>	None

		<p><i>‘Development would require the Settlement Boundary to be moved further into the countryside bringing it closer to the existing footpath between the church and Weir lane’ & ‘Development would extend significantly into the countryside beyond the rear garden lines of Main Street dwellings’</i></p> <p>In fact, the Settlement Line, The Footpath Line and the Willowsic garden line (and the rear wall of Brook Cottage 34a Main Street and the existing Garage buildings) are all the same at this point. The statements therefore ‘lacks any clarity’ . The proposed redevelopment would be ‘Edge of Settlement’ at most - Not a significant encroachment into the countryside.</p> <p><u>Insufficient weight given to arguments about benefit arising from the proposal.</u> Disagree With statement – <i>‘no perceived community benefit to be gained from this proposal’</i></p> <p>The significant ecological benefits: improvement of habitat and biodiversity that would arise from the proposal must be considered of ‘community benefit’ by government guidance.</p> <p>The improvement in aesthetics of the site must be considered of ‘community benefit’ by government guidance. Guidance emphasises: <i>‘Development on the edge of villages to be sympathetically designed and landscaped to minimise the impact upon the countryside and to ensure that harmony with the prevailing landscape’</i> clearly the existing buildings conflict with that. The new house and landscaping will be a vast improvement on the site.</p> <p>The proposal would provide an affordable home and workplace for a local young person who otherwise would be forced to leave the village, this is considered of ‘vital importance and benefit’ at national and Harborough District Council level.</p> <p>In August 2022 the site was visited by a senior member of Harborough District Council planning. Although on an informal basis his position and experience mean there is a ‘presumption that they have understood policy correctly’. His opinion was the proposal to redevelop the site would have no problem a meeting Harborough District Councils criteria for development approval even though it was marginally</p>		
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		outside the development line. In fact, it would be welcomed because Harborough District Council were very short of self-build approvals.		
32 Resident	General Comments	<p>I understand the need for a consultation process regarding the writing of the NDP, and public participation is assumed at all stages, but reading and responding to an 84 page detailed document of this type (I simply do not have time for the design appendix) is near impossible given the time, application and focus available to most working residents, including my own. I have attended and appreciate other forums have been held, but is the process set out really doing what it claims to be doing, or are most residents feeling pretty weary, ineffective and overwhelmed by long term consistent onslaught of planning and development information they have no effective control over?</p> <p>You are asking a lot here. Please see point 1. above. What is effective consultation and how is it really made possible or not for most residents?</p>	This is a statutory consultation process which is required by law. As you have said, there have been a significant number of alternative engagement opportunities, but we are grateful to you for taking the opportunity to comment here.	None
	Sites	Sites subject to development considered here are understandably within the boundaries outlined by the NDP but so many points such as traffic levels, transport, services and infrastructure are very dependent on wider developments too, such as those for Bushby and Thurnby and the Great Glen 'new town'. Given this, how can we make the best effective decisions in a NDP if they are not referenced in the plan, if only fleetingly? 100 dwellings required at present for HOTH is not really the issue if there will be 4K on our doorstep. This factor also questions the realistic aims and overall effectiveness of the Area of Separation.	A NDP cannot influence any developments outside its designated area. The only control is an area of separation wholly within our own area.	None.
	Infrastructure	Infrastructure is everything. It isn't given enough focus. New housing of any type, needs corresponding transport, healthcare and education. It needs utilities. I am surprised the consultants used do not state this more emphatically in the document.	Infrastructure requirements for transport, education and healthcare are statutory obligations. The NDP has identified other infrastructure needed within the site allocation policies.	None
	Type of new housing	The type of new housing is discussed, and this is welcomed, but ultimately the developers have the power. No NDP is going to detract from that. In the 2019 - 2021 period, 42% of new dwellings, not the HDC target of 12.5%, were 'large dwellings'! A major statistic in the NDP that probably needs more emphasis?	Once the NDP is passed at referendum, HDC will be required to take the policies of the NDP into	None

			account when determining planning applications.	
	Settlement Boundary	The Settlement Boundary. I am unclear how this has been arrived at and why is the undeveloped Stretton Lane site within it already?	The methodology used is explained in the NDP (Section 6.1) and further information is provided in the evidence base.	None
	Stretton Lane site	I fail to see how the Stretton Lane site has been allocated when the road bend by the school is so problematic. Another 20 -48 vehicles from 24 dwellings accessing a 'lane' so close to a dangerous corner by a school? I also have strong objections to the 20 (!) car spaces for the School adding to this. In addition, when it is claimed the Housing Association will maintain this site, can this be explained further? Who, what when? Also, by providing allocated car parking there is a covert assumption car use is validated. This actually increases usage. The car park spaces idea goes against so many national transport schemes and projects for the workplace. It just doesn't happen anymore and schools (especially schools with location issues such as ours) should not be exempt from this. But surely as the village expands through some many extra dwellings, the School will achieve its quota from the village and the need to drive kids in will lessen?	If the Leicestershire Highways Authority has any concerns about the proposed development, they will make it clear through the consultation on the draft NDP.	This site allocation has been removed.
33 Resident	POLICY L3B - RESIDENTIAL SITE ALLOCATION - Land north of Stretton Lane (Figure 6-4)	<p>The proposal to construct a car park within the site only increases my opposition to the whole development.</p> <p>In my opinion as a former Highway Engineer I believe that it will have little effect on solving parking issues but will make traffic problems on Stretton Lane a lot worse.</p> <p>If we assume that these 20 parking spaces are for school run vehicles twice a day (I understand there are now extra spaces for teachers cars available on the cricket ground), this will constitute an additional 80 traffic movements in and out of the site daily. This can only increase congestion and accident risk. The morning run is at peak time when many of the new residents will be leaving home, and the through traffic in the village is at its highest. Many vehicles entering the village do not observe the 20mph limit and this will still be the case if the limit is extended.</p>	The developer is proposing this as a rural exception site and as such it cannot be allocated within an NDP.	This site allocation has been removed.

		<p>The other question is who will be using the car park outside school times and holidays. People attending the Church or Village Hall are unlikely to park there, and will continue to park on Main Street and St Catherines Way which are closer.</p> <p>I understand that the Housing Association have agreed to adopt and maintain the car park. I have had dealings with Housing Associations in my professional capacity, and although some are good, others leave a lot to be desired with regard to long term maintenance.. I feel that we should be wary of this.</p> <p>Car parks of this type are notorious for anti-social behaviour, and I am concerned of the effect this could have on the lives of the existing residents who live close by on Stretton Lane.</p> <p>With regard to the proposed development as a whole, I believe that the reasons why the previous application was refused by the Inspector in 2015 remain as valid as ever and should be taken into account.</p> <p>I appreciate that the Neighbourhood Plan has to take the requirements of Government and Harborough District Council into account, but the views of local residents are also very important as they gave the Stretton Lane site a low priority for development when asked in the Community Survey. The Community Questionnaire Outcome shows the site ranked 3 out of 6 but it was actually voted 5 out of 6.</p>		
34 Resident	General Comments	I thought both the Neighbourhood Development Plan and Design Guide documents where excellent and well presented and clearly demonstrate the significant amount of time and effort that has gone into their production. However, as you will appreciate from my comments, I have reservations about one of the recommendations.	Thank you	None
	Stretton Lane site	<p>Why is the land North of Stretton Lane still considered as one of the preferred development sites when it has been rejected by the Parish Council, Harborough District Council and turned down on appeal. Although there is a revised plan it has not satisfactorily addressed the original issues and the inclusion of a car park has raised further objections and has again been rejected by the Parish Council in November 2024.</p> <p>The site was ranked 5 of 6 (not 3) for development within the Community Questionnaire where there was a clear preference for any future developments to be north of the A47 as there are already major traffic problems through the village</p>	<p>The developer is proposing this as a rural exception site and as such it cannot be allocated within an NDP.</p> <p>Thank you for pointing out this error.</p>	<p>This site allocation has been removed.</p> <p>Change to be made as indicated</p>

		along Main Street and significant issues on Stretton Lane related to school start and finish times.		
35 Resident	General Comments	Please Note that Policy L3B was ranked 5 out of 6 sites in the Community Questionnaire and NOT 3 out of 6 as printed (Page 25)	Thank you for pointing out this error.	Change to be made as indicated
	Policy L3B (Pages 23/24/25) Residential Site Allocation : Land North of Stretton Lane	<p>This proposed development with the provision for about 24 dwellings and a public car park of about 20 parking spaces completely contradicts Policy L2, Policy H1, Policy EV1, and Policy EV4.</p> <p>The development would have a severe and adverse impact on the local character of the settlement and its Conservation Area, as well as long view into Houghton from the public footpath which is widely used by walkers, runners and walking groups. The entrance to the car park is on a narrow road close to two blind bends where traffic does not always adhere to speed limits. The traffic in and out of the car park would make the road even more dangerous. It is also directly opposite the entrance to the Cricket Ground which is in the Conservation Area.</p> <p>It is stated in the Development Plan that the Housing Association would agree to adopt the car park. An open car park on the edge of a village, and with no security would be a magnet for antisocial behaviour, litter, overnight camping, burnt-out cars etc. As it is private land the Council would not be responsible for any clearing up.</p> <p>This whole development would have a harmful effect on the character and appearance of the area and the setting of the Houghton-on-the-Hill Conservation Area, and would undermine the significance of this heritage asset.</p>	The developer is proposing this as a rural exception site and as such it cannot be allocated within an NDP.	This site allocation has been removed.
	Policy L2 (Pages 17/18/19)	<p>Area of Visual Separation between Houghton, Thurnby & Bushby & Scraftoft</p> <p>I do not understand why the two sites which have been allocated as "appropriate" for consideration (Policy L3B and L3C) are the two sites which are closest to the Visual Separation Area. This totally contradicts Policy L2.</p>	Thank you for your comments. We do not agree there is a contradiction.	None
	Policy H1 (Page 33) Housing Mix	More bungalows are required in the village. A lot of residents in under-occupied large houses who do not want to leave the village would appreciate the opportunity to downsize to a bungalow. They need to have at least two bedrooms and with a reasonable garden.	Policy H1 supports the provision of homes suitable for older people. Each of the residential allocations requires accommodation	None

			suitable for older people.	
	Policy EV1 (Page 53) Conservation of Habitats and Biodiversity	The proposals for the Stretton Lane development (Policy L3B) would completely contravene the policies set out to protect and enhance the surrounding countryside, wildlife habitats and biodiversity.,	We disagree. The developer is proposing this as a rural exception site and as such it cannot be allocated within an NDP.	This site allocation has been removed.
	Policy EV4 (Page 58) Footpaths, Bridleways, Cycleways and Access to the Countryside	<p>The Policy states that "proposals that result in the loss of, or have a significant adverse effect on existing footpaths will not be supported without appropriate mitigation."</p> <p>The public footpath which goes directly through the proposed development (Stretton Lane North - Policy L3B) would be severely compromised. Also because of traffic going to and from the proposed development, any mitigation corridors for wildlife would be impossible.</p> <p>I agree cycleways in theory are good, but in reality, because of the narrow and congested roads in the village, they are not viable.</p>	We believe that the policy provides adequate mitigation.	None
36 Resident	General Comments	The document is excellent, I do believe my comments address the areas I feel the general public also has some concerns as well.	Thank you	None
	Policy L3B: Residential Site Allocation; Land north of Stretton Lane (Figure 6-4)	<p>I would like to express my concerns on the current specification of the proposed site.</p> <p>The site specification is wrong for the site as it stands for the following reasons</p> <ul style="list-style-type: none"> - Its proposed in the latest planning application as a Social Housing Application, this is not a requirement for the village as it stands - The need is for "Starter Houses" and " Down Sizing Houses" for current villagers to allow the current balance of locals and desired houses - The Provision of 20 car park spaces is not needed as this will lead to anti social activity, noise, light pollution, poor parking activity and an increase in parking issues where the village only experiences 30 - 40 mins twice a day for the school run - The planning application was also at the PC meeting in November was rejected with 16 objections. 	The developer is proposing this as a rural exception site and as such it cannot be allocated within an NDP.	This site allocation has been removed.

		The site overall I believe has merit for development but not in its current specification.		
	Policy L3C: Reserve Site; Land north of the A47, east of Houghton (Figure 6-5)	<p>This site I do believe should become a second site as would allow the right number of houses for potential expansion of the current Government. The site is a near replica of the one further down the A47 at Redvers Farm (POLICY L3A: RESIDENTIAL SITE ALLOCATION; Land north of A47, west of Houghton (Figure 6-3))</p> <p>- I have concerns on the plan of using Ingarsby Lane being used as an exit to the main A47 and cross roads with the Main Street - Possible issues if the Golf Club is built as traffic would be heavy here - Such a site would also balance the village more with expansion on the more rural side vs expansion at the end of the Main Street / Stretton Lane which would increase traffic via the village</p>	We consider this site to be appropriate to come forward only if additional housing is required in the Parish over the lifetime of the Plan. The Highways Authority will make comment on the suitability of access arrangements, whose views will be taken into account.	None
	Policy H1: Housing Mix	On this policy I believe we need to express the non need for greater social housing based the lack of facilities in the village, a deteriorating bus service in years to come, the lack of need in a current balanced community that needs more young person starter homes or homes for older residents to downsize to.	The provision of affordable housing is a statutory requirement.	None
	Policy H2: Affordable Housing	While the 10 and possibly more houses are required in the future I believe these should not be on one site as is proposed on the latest Stretton Lane Application. This would group all one social group on one site and would be better managed across possible multiple sites or not within the village at all based on support facilities and transport .	Noted	None
37 Resident	General Comments	It is clear that much work has gone into this document, and we must thank the members of the NDP Working Party for doing this. For brevity I will not comment on the good and neutral parts of the draft but only on those that need to be changed.	Thank you	None
		There have been issues about how this NDP has been developed - they are documented in correspondence to the Parish Council and can be consulted again but in brief they revolve around transparency of the process (no Minutes of the NDP Working Party were published for over a year) and about scrutiny - the PC chair also chairs the NDP WP, and ALL Parish Councillors were on the working group, leaving no one on the Council to act as an arms-length check or balance.	The consultation on the NDP as it has progressed has been extensive with many community events taking place. The Parish Council has exceeded	None

	<p>There are also ongoing concerns about how the democratic will of the village (as captured in the NDP questionnaire) changed into the draft allocation of sites - e.g. the land off Stretton Lane was fifth in the village choice (not third as the draft NDP says) but it is on the top two sites in the draft plan, whereas the most popular site in the questionnaire was only in the draft NDP as the reserve site. Concerns about that decision remain within the village. There is also no transparency about how the issues about traffic within the village were changed by the NDP WP into the plan for a car park off Stretton Lane.</p> <p>The Parish Council has now voiced its objection to the active planning application for the car park and development on the Stretton Lane site (despite previously discussing with the applicant in the active planning application how that application could be changed to include a car park) - this is partly because villagers do not think a car park there would actually help but also that it would also attract crime and disorder, which the PC has a duty to try to reduce.</p> <p>The Parish Council does not support the application for the Stretton Lane site with car park and so the Plan must be changed to remove that or else it is unlikely that HDC or any other external scrutiny would accept the plan as valid, whether it were to be supported in the village referendum or not.</p> <p>So, the Plan must change.</p> <p>A sensible principle for that change would be for the Plan to support no development that would put more traffic down to St Catharine's Way, Main Street, or Stretton Lane. Developments that have direct access to the A47 are therefore sensible, those that don't must be opposed.</p> <p>Adding the Stretton Lane site to the western edge buffer zone now would be the most sensible next step as it would protect the environment for wildlife and would not worsen the already dangerous and congested traffic situation at the bend by the school (which most Parish Councillors do not see many times every day as they do not live close to it).</p> <p>The Plan should also reflect the new HDC targets for housing (due imminently) but only to that number and not more. These targets must be reflected but not</p>	<p>its obligations in this regard.</p> <p>The developer is proposing this as a rural exception site and as such it cannot be allocated within an NDP.</p> <p>There has been ongoing dialogue with HDC as</p>	<p>This site allocation has been removed.</p> <p>None</p>
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		<p>exceeded, and development should be within the whole span of the Local Plan and not all at the start, which would lead to much more development and ruination of the village.</p> <p>Houghton needs an NDP that the majority of the village can support and that will enhance the quality of life of villagers, and not reduce it. I hope the NDP WP will take this opportunity to listen and to modify the Plan accordingly.</p>	<p>the Plan has progressed.</p> <p>The NDP will be subject to a referendum in which all eligible residents will be able to vote.</p>	None
	Cycle Track	A cycle track to Thurnby is a good idea but it needs a separate footpath too as cyclists are currently a danger to people walking to Thurnby and back.	Separated cycle paths and footpaths are not required by LCC Highways.	None
38 Resident	General comments	I am concerned about some aspects of the draft neighbourhood plan and will be unable to support this document at referendum in its current form. My main concerns are as follows:	Noted	None
	Residential Site Allocation Policy L3B	<p>I do not agree with policy L3B regarding the land north of Stretton Lane. The policy states that a development will be supported on this site subject to various conditions including:</p> <p>a) 'The development will provide for about 24 dwellings'</p> <p>f) 'The area adjacent to Stretton Lane will provide a public carpark of about 20 parking places linking to a safe road crossing for access to the school and Main Street'.</p> <p>I object to this being included in the neighbourhood plan as these conditions replicate specific details appearing on a current planning application on this site. These specific points have been met by serious and sustained objections from the local community and also recent objections from the Parish Council specifically on point f regarding the carpark. These objections are outlined in the November parish council minutes. As such this should not be included in the neighbourhood plan as it is in clear conflict with the wishes of local residents and also local elected representatives on the parish council.</p> <p>Furthermore, the Draft Neighbourhood Development Plan incorrectly states that the result of the Community Questionnaire places this site as the 3rd most preferred site of development out of the 6 possibilities when it was in fact placed as 5th out of the 6 possibilities showing that this site does not have the support of local residents as a preferred site of development.</p>	The developer is proposing this as a rural exception site and as such it cannot be allocated within an NDP.	This site allocation has been removed.

	Policy L3C	<p>I do not agree with policy L3C listing the Land north of the A47, east of Houghton as a RESERVE SITE. This site should be the preferred site for development in the Local Plan and certainly not listed as a reserve.</p> <p>Firstly, this site is strongly supported by residents as the preferred site for development in the area. It was ranked as 1st out of the 6 possible areas of development in the Community Questionnaire. This was closely followed by the site listed as Land north of the A47, west of Houghton. I feel that by listing this as a reserve site the Draft Neighbourhood Development Plan is not taking into account the wishes of local residents and is acting in an undemocratic way.</p> <p>Furthermore, encouraging development to the north of the A47 is far preferential as it will avoid increased traffic flow coming through the heart of the village. Access to vehicles onto a main arterial roadway is far better than sending traffic through a village with pedestrian movement and an increased risk of accident and fatalities. Whilst I agree that there are always going to be traffic considerations with development I do not agree with the NPWP Conclusion that there will be 'serious negative impacts on nearby roads'.</p> <p>In addition to this the southern section of the Land North of A47, east of Houghton supported as a potentially suitable area development both by the SHELAA Appraisal and the AECOM Assessment.</p>	The methodology used is explained in the NDP (Section 6.1) and further information is provided in the evidence base.	None
	Policy L3A	<p>I agree with policy L3A regarding Land North of A47, west of Houghton. This is a preferred site of development supported by residents (2nd out of 6 possible sites) and the assessment of both SHELAA Appraisal and AECOM Assessment. It is far preferable to develop on the sites north of the A47 due to the traffic considerations etc outlined above.</p>	Noted	None
	Area of Separation (Policy L2)	<p>I support the aims of the Area of Separation as outlined in the Draft Neighbourhood Plan. However, I strongly urge that the potential development site off Stretton Lane should also be included to form part of this Area of Separation between the villages of Houghton and Bushby / Thurnby. The potential development site off Stretton Lane has been subject to numerous planning applications over the years and has always been fiercely opposed by the community and parish council. The most recent planning application to be rejected was refused due to the detrimental visual impact development on this site would have on the landscape and this is an impact that is difficult to overcome on this site.</p> <p>A current planning application on this site is being opposed both by residents and the parish council to prevent development on this site. It makes sense to include this site in the proposed Area of Separation. It will protect this area from</p>	The developer is proposing this as a rural exception site and as such it cannot be allocated within an NDP.	This site allocation has been removed, and the Area of Separation extended to include this area.

		development and will successfully address various objectives of the NDP, notably Objectives 4, 8 & 7.		
39 Resident	General comments	We should not build houses simply because land is available. Such a policy fails to address the specific needs of our community in Houghton on the Hill, as well as the needs of those who will move into these homes. Housing must be built on land that is appropriate and serves the greater good. Housing must be developed in locations that provide lasting value to the entire community.	Agreed – this is why a comprehensive housing site options appraisal was commissioned to help determine the most suitable sites for development to meet the housing requirement set by HDC.	None
	Policy L2)	Reviewing the proposed map (Policy L2) for Houghton on the Hill, it is clear the village has a disproportionate number of houses south of the A47. This road is a vital lifeline, not only for our community but also for the city of Leicester. Developing housing along this transport corridor makes much more sense. I propose that the settlement boundary be expanded to include land to the east of Ingarsby Lane, north of the A47 (F, as well as A,B and C - SHELAA) This adjustment would also necessitate traffic calming measures on the A47, which would enhance traffic flow, regulate speed, and significantly improve safety within the village.	The methodology used is explained in the NDP (Section 6.1) and further information is provided in the evidence base. The proposed residential allocations were considered the most appropriate.	None
	Policy L3B (SHELAA – E)	I strongly believe that this parcel of land should not be included in the NDP. The fact that it is 'available' should not be the sole criterion for development. Traffic in the southernmost area of the village is already severe, particularly during school drop off, pick up times and rush hour. The 'S' Bends around the school are a particular problem - Adding more housing in this location would only exacerbate these issues. The proposed car park does little to mitigate these problems and offers no meaningful solution to the current traffic challenges.	The developer is proposing this as a rural exception site and as such it cannot be allocated within an NDP.	This site allocation has been removed.
40 Resident	General comments	I do not agree with some of the contents of the Draft Neighbourhood Development Plan and would wish them to be revised in particular relation to: 1) The residential site allocation 2) The area of separation between Houghton-on-the-Hill and Thurnby/ Bushby (Policy L2)	Noted	None
	Policy L3B	Policy L3B concerns land North of Stretton Lane. It states that it will support development on this site if a number of conditions are met, including 24 dwellings and a public car park. I object to this. A current planning application, which has	The developer is proposing this as a rural exception site and as	This site allocation has been removed.

		<p>been strongly objected by local residents and the Parish council (with particular relation to the car park), is currently in process and the specific details in policy L3B are exact points lifted from the planning application itself. I believe that this should not be included as it is in contradiction to the lack of Houghton resident and Parish council support.</p> <p>Local residents previously received a community questionnaire asking about the preferred sites for development when considering the Neighbourhood Development Plan. The land North of Stretton Lane was ranked 5th out of 6 possible sites, yet this Draft Neighbourhood Development Plan states that this land site is the 3rd most preferred site for development out of 6. This is therefore incorrect and does not reflect the support of the local residents for a preferred site of development.</p>	<p>such it cannot be allocated within an NDP.</p> <p>Thank you for pointing out this error.</p>	Corrected.
	Policy L3C	<p>Equally, Policy L3C lists the land North of the A47, East of Houghton as a reserve site. This was ranked 1st out of the 6 possible preferred areas of development in the local plan from the community questionnaire. This should be ranked as 1st in the Draft Neighbourhood Development Plan, not reserve, in order reflect community wishes. It was also supported by the SHELAA appraisal and AECOM Assessment as a preferred development site.</p> <p>I do agree with policy L3A which suggests development of land North of the A47, West of Houghton as it was ranked 2nd out of 6 by the community questionnaire. I appreciate that there needs to be areas outlined for development in the village so developing these sites to the North of the A47 would be preferable, as they would have easy access to the main A47 and also have the least impact on the flow through the village centre and out past the Primary school which always gets terribly congested.</p>	<p>The methodology used is explained in the NDP (Section 6.1) and further information is provided in the evidence base. The proposed residential allocations were considered the most appropriate.</p>	None
	Policy L2	<p>The Draft Neighbourhood Development Plan outlines the area of separation between Houghton and Thurnby/ Bushby (Policy L2) which I agree with to retain the village. However, the land North of Stretton Lane that has been outlined for potential development should be included in this area as its development has been consistently objected to by local residents and the Parish Council. There has been multiple planning applications refused before, the latest refusal on the grounds that it was detrimental to the visual impact of the landscape. This will not change with the latest planning application, which again is being strongly objected, therefore it is important that it is included in this area of separation.</p>	<p>The developer is proposing this as a rural exception site and as such it cannot be allocated within an NDP.</p>	<p>This site allocation has been removed, and the Area of Separation extended to include this area.</p>

41 Resident	General comments	<p>While the document lists policies, there are no solutions. Most of the concerns are unchanged from the first village plan of 2004 and there has been very little progress since. There needs to be more solutions and a better vision of the future. As it stands, both it and the last NDP are just a justification for building more houses without any other benefits for the community.</p> <p>The policies in general are uncontroversial.</p>	<p>We disagree. The changes introduced through the NDP Review are listed in Appendix 3 and are significant.</p> <p>The NDP promotes housing in the most suitable locations.</p>	None
	Policy L1 Settlement Boundary	The proposed inclusion of the Stretton Lane site contradicts with the other policies in the draft. (Section 80) The site is furthest from the main village facilities. The existing public transport provision is poor with the bus service on the A47 at commuting time. There is no safe cycling route to the village and the road junction is unsafe. The previous reasons for refusal of planning permission still stands. The site must be removed from the plan otherwise the plan will be rejected by the village.	Thank you. The methodology used is explained in the NDP (Section 6.1) and further information is provided in the evidence base. None of the available sites meet all of the criteria in para. #80 of the NDP.	None
42 Resident	General comments	A lot of work has gone into the documents and I agree with much of the village design guide and codes particularly those on Nature.	Thank you.	None
	Page 25 Land north of Stretton Lane	<p>Regarding the land north of Stretton Lane the document states that this area was ranked 3 of 6 sites on the Community Questionnaire outcome. However, the questionnaire results seem to suggest that it was ranked 5 out of 6.</p> <p>I can't help thinking that of all the plots considered for possible development the one north of Stretton Lane is by far the most biodiverse, including the observation of great crested newts in or adjacent to the area. I feel that if we really want to preserve biodiversity, never mind increase it, then putting housing developments on the plots with greatest biodiversity is not the best way to go about it. In fact it seems to be achieving the exact opposite. The only reference to maintaining biodiversity in the plan seems to be (L3Bh) requiring that the open green spaces be maintained as meadow rather than as mown grass. Without some more detail on what proportion of the land will be left as meadow and how those bits join up it is hard to see how biodiversity will not be decreased.</p>	<p>Thank you for pointing out this error.</p> <p>The developer is proposing this as a rural exception site and as such it cannot be allocated within an NDP.</p>	<p>Corrected</p> <p>This site allocation has been removed.</p>

43 Resident	General comments	A well organised and professionally produced document. I support the idea of an area of separation between Houghton and villages to the West. Well presented and considered document.	Thankyou.	None
	Policy L3A (Land North of A47)	I understand the need to have land allocated for buildings and support policy L3A (Land North of A47).	Noted	None
	Policy L3B (Stretton Lane)	I have some concerns regarding Policy L3B (Stretton Lane), in particular 100% affordable housing in one area I feel there should be a 40:60 % mix, as per HDH policy.	The developer is proposing this as a rural exception site and as such it cannot be allocated within an NDP.	This site allocation has been removed.
	Policy EV3	I feel we should do everything possible to protect our non-heritage sites and wonder if these should have special protection and recognition, perhaps a "Blue plaque" scheme? The rural heritage of Houghton should be recognised - with protection of our ancient Ridge and Furrow farmland. This would be in line with HDH Character assessment and landscape capacity study of 2016 which specifically allocated this area of ridge and furrow as "conserve and restore". Perhaps an information plaque or board should be erected adjacent to the playing field highlighting this fine example of ridge and furrow to the South West of the village.	These comments will be considered by the Parish Council to explore outside of the NDP.	None
44 Harborough District Council	General comments	Thank you for the opportunity to comment on the pre submission draft of the Houghton NDP. We note that previous comments have already been taken into account. Further comments are below.	Noted	None
	Figure 6-3	Figure 6-3 should be updated to show the most recent development adjacent to the proposed site L3A	Agreed	Change to be made as indicated
	Policy L3B	Policy L3B – the site has already been submitted as a planning proposal (exception site). Including the site as an allocation may mean the site cannot be considered an exception site. Historic England have already expressed some concerns about the allocation and proximity to the conservation area. (email forwarded). If there are proposals that the community would like to be delivered as part of any development of this site, it may be worthwhile including these as a policy should the site come forward, rather than allocating the site under the policy.	The developer is proposing this as a rural exception site and as such it cannot be allocated within an NDP.	This site allocation has been removed.

	Reserve site L3C	Reserve site L3C – we note the delivery of this site is preposed to be dependent on the Local Plan housing numbers increasing. There is a risk that allocating as a reserve site means the site is considered developable and comes forward earlier than the QB and community anticipate.	Noted. Having a reserve site that is outside the settlement boundary helps to manage future development and is considered good practice.	None
	Policy L4	Policy L4 – phasing – not sure that this policy adds anything in the current format.	Agreed.	Phasing Policy removed.
	Policy L5	Policy L5 – golf course - the SDA at Scraftoft Golf Course appears stalled, so the likelihood of the golf course site coming forward is reduced at the moment.	We understand this – but until the proposal is formally withdrawn we would like to retain the policy.	None
	Policy EV4	Policy EV4 – footpaths – suggest adding to end of policy ‘through application by the Local Planning Authority of HDC developer contributions policy’	Agreed	Change to be made as indicated.
	Policy EV3: Non-Designated Heritage Assets	<p>The inclusion of Policy EV3: Non-Designated Heritage Assets is welcomed.</p> <p>P. 55</p> <p>The policy begins on P55 and runs to P58 and the pages include details on both designated and non-designated heritage assets. If both designated and non-designated heritage assets are to be included in the same policy it is recommend that the policy is re-named to reflect this.</p> <p>It is good to see that non-designated heritage assets not currently on the HER have been identified in the plan. By only presenting the assets in a list (P. 55) it is difficult for the reader to understand the significance of the assets and the reasons for their inclusion. The Historic England Advice Note on Neighbourhood Planning may be useful Neighbourhood Planning and the Historic Environment Historic England (especially P.18 on preparing a list of non-designated heritage assets). Best practice is to include an image of the asset and short explanation to support its inclusion (this could be an appendix). The criteria used in the Historic England document ‘Local Heritage Listing: Identifying and Conserving Local Heritage’ Local Heritage Listing: Identifying and Conserving Local Heritage Historic England are useful.</p>	Thank you. We are following this advice and will separate out the considerations of Listed Buildings, NDHA’s, landforms and archaeology.	Change to be made as indicated.
	P. 56 Figure 6-11	<p>P. 56 Figure 6-11</p> <p>The map shows the 21 assets identified in the table in Policy EV3. Item 21 in the table is ‘Archaeological finds throughout the Parish’. Showing the other 20 assets</p>	Thank you. We are following this advice	Change to be made as indicated

		<p>alongside the assets on the Historic Environment Record (HER) makes it quite difficult to read the map and clearly see the location of the assets. The map does not allow for the numbering of all 20 of the assets to be seen.</p> <p>It is good that the assets listed at point 21 in the table can be identified by their HER reference number. Showing the assets 1 to 20 on one map and the assets from the HER (21 in the table) on a separate map may help make it easier to read. When using data from the HER (such as on the map) attributing the source of the information is recommended so that the reader can find the source data if they wish to use it.</p> <p>The entries from the HER could be shown in an appendix. For example, a list of the asset name and HER reference which could even include an individual hyperlink to the HER entry. This would enable the reader to see what the entry contains and help them assess the significance of the asset and consider the level of impact development may have. For example, the discovery of a shard of pottery (MLE 6152) is different to an iron age burial site (MLE 22823).</p>	and will separate out the figures.	
	P. 56 Figure 6-12	<p>P. 56 Figure 6-12</p> <p>It is good to see that the quality of the areas of ridge and furrow are identified on the map. Providing such level of detail on the quality is welcomed. There is no source identified for the information shown on the map, consequently it is not clear whether this reflects the current condition of the ridge and furrow. It is unlikely that this level of detail on the quality of ridge and furrow would be obtainable from the sources of evidence listed for this policy.</p> <p>Addressing NDP Objectives</p> <p>Objective 7 ‘Safeguarding Village Heritage’ is not included in the list of objectives addressed by this policy. para 157 refers to the contribution made by the non-designated heritage assets to the local character. Having identified the contribution heritage makes to local character it may be appropriate to re-visit P. 11 point 5.3.1 and consider whether it is appropriate to include Objective 7.</p>	<p>Thank you. The current state of R&F was qualitatively assessed by fieldwalking, and we will clarify this in the text.</p> <p>Agreed. Objective 7 will be referenced here.</p>	<p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p>
	P. 57 Figure 6-13	<p>P. 57 Figure 6-13</p> <p>This maps the designated heritage assets within the conservation area. However, presumably due to space constraints, it does not name them all. Even just using the list entry number may prove difficult in the space. It may be clearer to show the location of the assets on the map and list the named assets in an appendix. This would allow for all designated assets to be named and it would also be possible to include a link directly from the list to the individual entries on the National Heritage List for England (Historic England website). The list entry shows the level of</p>	Thank you. We are following this advice and will separate out the considerations of Listed Buildings, NDHA’s, landforms and archaeology.	Change to be made as indicated.

		designation (eg Grade II*) and details of the asset and etc. which is useful in understanding the significance of the heritage asset and its setting. Attributing the source of the information shown on the map is recommended.		
	P. 58	P. 58 English Heritage should be changed to Historic England	Agreed	Change to be made as indicated.
	P. 23 Policy L3B: Residential Site Allocation; Land north of Stretton Lane	<p>The site makes a positive contribution to the setting of the northern part of the Houghton on the Hill Conservation Area and contributes to the open rural setting of the conservation area at its southern entry point. It is a sensitive site where development would need to be very carefully located in order to minimize impact on the character and setting of the conservation area.</p> <p>It is suggested that Policy L3B includes recognition of the proximity to and contribution to the setting of the Houghton on the Hill Conservation Area (a designated heritage asset) and the mitigation required. This will help contribute to Objective 7 of the Plan - Safeguard Village Heritage.</p>	The developer is proposing this as a rural exception site and as such it cannot be allocated within an NDP.	This site allocation has been removed.
45 Leicestershire County Council	P67 9.3	<p><u>Public Transport</u></p> <p>Houghton on the Hill is served by the 747-bus service operated by Centrebus on a two hourly frequency, Monday to Saturday connecting to Uppingham and Leicester. Leicestershire County Council and Rutland County Council contribute towards this service due to limited commercial viability; however, future trial services could be introduced to assess demand and enhance connectivity through cross boundary partnership working.</p>	Noted	None
45 Leicestershire County Council	General Comments	<p><u>Highways</u></p> <p>The County Council recognises that residents may have concerns about traffic conditions in their local area, which they feel may be exacerbated by increased traffic due to population, economic and development growth.</p> <p>Like very many local authorities, the County Council's budgets are under severe pressure. It must therefore prioritise where it focuses its reducing resources and increasingly limited funds. In practice, this means that the County Highway Authority (CHA), in general, prioritises its resources on measures that deliver the greatest benefit to Leicestershire's residents, businesses and road users in terms of road safety, network management and maintenance. Given this, it is likely that highway measures associated with any new development would need to be fully funded from third party funding, such as via Section 278 or 106 (S106) developer contributions. I should emphasise that the CHA is generally no longer in a position</p>	These general comments are noted.	None

		<p>to accept any financial risk relating to/make good any possible shortfall in developer funding.</p> <p>To be eligible for S106 contributions proposals must fulfil various legal criteria. Measures must also directly mitigate the impact of the development e.g. they should ensure that the development does not make the existing highway conditions any worse if considered to have a severe residual impact. They cannot unfortunately be sought to address existing problems.</p> <p>Where potential S106 measures would require future maintenance, which would be paid for from the County Council's funds, the measures would also need to be assessed against the County Council's other priorities and as such may not be maintained by the County Council or will require maintenance funding to be provided as a commuted sum.</p> <p>In regard to public transport, securing S106 contributions for public transport services will normally focus on larger developments, where there is a more realistic prospect of services being commercially viable once the contributions have stopped i.e. 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>		
45 Leicestershire County Council	Page 60	<p><u>Flood Risk Management</u></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)</p>	These general comments are noted.	None

		<p>undertake investigations into flooding, review consent applications to undertake works on ordinary watercourses and carry out enforcement where lack of maintenance or unconsented works has resulted in a flood risk. In April 2015 the LLFA also became a statutory consultee on major planning applications in relation to surface water drainage and have a duty to review planning applications to ensure that the onsite drainage systems are designed in accordance with current legislation and guidance. The LLFA also ensures that flood risk to the site is accounted for when designing a drainage solution.</p> <p>The LLFA is not able to:</p> <ul style="list-style-type: none"> • Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation. • Use existing flood risk to adjacent land to prevent development. • Require development to resolve existing flood risk. <p>When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points:</p> <ul style="list-style-type: none"> • Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)). • Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map). • Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding. • How potential SuDS features may be incorporated into the development to enhance the local amenity, water quality and biodiversity of the site as well as manage surface water runoff. • Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk. <p>All development will be required to restrict the discharge and retain surface water on site in line with current government policies. This should be undertaken through the use of Sustainable Drainage Systems (SuDS). Appropriate space allocation for SuDS features should be included within development sites when considering the housing density to ensure that the potential site will not limit the ability for good</p>		
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		<p>SuDS design to be carried out. Consideration should also be given to blue green corridors and how they could be used to improve the bio-diversity and amenity of new developments, including benefits to surrounding areas.</p> <p>Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing watercourses and land drainage (including watercourses that form the site boundary) are retained as open features along their original flow path and are retained in public open space to ensure that access for maintenance can be achieved. This should also be considered when looking at housing densities within the plan to ensure that these features can be retained.</p> <p>LCC, in its role as LLFA will not support proposals contrary to LCC policies.</p> <p>For further information it is suggested reference is made to the National Planning Policy Framework (March 2012), Sustainable drainage systems: Written statement - HCWS161 (December 2014) and the Planning Practice Guidance webpage.</p> <p>Flood risk mapping is readily available for public use at the links below. The LLFA also holds information relating to historic flooding within Leicestershire that can be used to inform development proposals.</p> <p>Risk of flooding from surface water map: https://flood-warning-information.service.gov.uk/long-term-flood-risk</p> <p>Flood map for planning (rivers and sea): https://flood-map-for-planning.service.gov.uk/</p>		
45 Leicestershire County Council	Page 58-59	<p>Public Rights of Way</p> <p>Leicestershire has an extensive network of Public Rights of Way which are key to allow people to explore the local countryside, link communities and give access to schools, shops, work and facilities. Public Rights of Way are recorded on the Definitive Map and a version of this can be viewed at: Where to walk in Leicestershire Leicestershire County Council</p> <p>Public Rights of Way are a material consideration in the determination of Planning applications. National Planning Policy Framework states that “Planning policies and decisions should protect and enhance Public Rights of Way and access, including</p>	These general comments are noted.	None

		taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks...”. Leicestershire County Council will expect that where Public Rights of Way are impacted by development consideration is given not just to replacement or reinstatement but enhancement of the provision.		
45 Leicestershire County Council	P20 - 27 POLICY L3A POLICY L3B POLICY L3C	<p><u>Minerals & Waste Planning Specific Comments</u></p> <p>Most of the village is within the Minerals Safeguarding Area (MSA) for Sand & Gravel, therefore we would indicate that this is a concern that it is not acknowledged in some of the allocations assessments.</p> <ul style="list-style-type: none"> • Land to the north of Uppingham Road, west of Houghton (Figure 6-3). Potential for up to 80 dwellings (AECOM estimate) – identified correctly as half of site within MCA (Mineral Consultation Area). Also within MSA however as MSAs are also MCAs • Land north of Stretton Lane Planning Application (24/00359/FUL) is for 24 dwellings – this is also within MSA/MCA which is not mentioned in assessments • RESERVE SITE; Land north of the A47, east of Houghton (Figure 6-5) – half of the site is within MSA/MCA which is not mentioned in the assessments. <p>Any allocation and forthcoming application/s would need to be accompanied by an assessment of the potential mineral resource adjacent and within the allocation in line with Policy M11 of the Leicestershire Minerals and Waste Local Plan (LMWLP). The 'agent of change' principle would apply if an allocation were made which could affect the operation of extant waste sites by the introduction of sensitive uses. There is an extant sewage treatment works (STW) within the vicinity of the village, and this could impact upon amenity of the site proposed to the west of the school (Land north of Stretton Lane). This site lies to the east of the extant STW. Any allocation in closer proximity to the extant STW would need to be in line with Policy W9 of the Leicestershire Minerals and Waste Local Plan (LMWLP).</p> <p>The County Council is the Minerals and Waste Planning Authority; this means the council prepares the planning policy for minerals and waste development and also makes decisions on mineral and waste development.</p> <p>Although neighbourhood plans cannot include policies that cover minerals and waste development, it may be the case that your neighbourhood contains an</p>	Noted	AECOM will not change their document.

		<p>existing or planned minerals or waste site. The County Council can provide information on these operations or any future development planned for your neighbourhood.</p> <p>You should also be aware of Minerals and Waste Safeguarding Areas, contained within the adopted Leicestershire Minerals and Waste Local Plan Up to 2031 (Adopted-2019)</p> <p>These safeguarding areas are there to ensure that non-waste and non-minerals development takes place in a way that does not negatively affect minerals resources or waste operations. The County Council can provide guidance on this if your neighbourhood plan is allocating development in these areas or if any proposed neighbourhood plan policies may impact on minerals and waste provision.</p>		
45 Leicestershire County Council	Page 48	<p><u>Property Education</u></p> <p>Whereby housing allocations or preferred housing developments form part of a Neighbourhood Plan the Local Authority will look to the availability of school places within a two-mile (primary) and three-mile (secondary) distance from the development. If there are not sufficient places then a claim for Section 106 funding will be requested to provide those places. It is recognised that it may not always be possible or appropriate to extend a local school to meet the needs of a development, or the size of a development would yield a new school. However, in the changing educational landscape, the Council retains a statutory duty to ensure that sufficient places are available in good schools within its area, for every child of school age whose parents wish them to have one.</p>	These general comments are noted.	None
45 Leicestershire County Council	General Comments	<p><u>Adult Social Care</u></p> <p>It is suggested that reference is made to recognising a significant growth in the older population and that development seeks to include bungalows etc of differing tenures to accommodate the increase. This would be in line with the draft Adult Social Care Accommodation Strategy for older people which promotes that people should plan ahead for their later life, including considering downsizing, but recognising that people's choices are often limited by the lack of suitable local options.</p>	These general comments are noted.	None
45 Leicestershire County Council	General Comments	<p><u>Environment</u></p> <p>With regard to the environment and in line with Government advice, Leicestershire County Council (LCC) would like to see Neighbourhood Plans cover all aspects of archaeology and the historic and natural environment including heritage assets,</p>	These general comments are noted.	None

		archaeological sites, listed and unlisted historic buildings, historic landscapes, climate change, the landscape, biodiversity, ecosystems, green infrastructure as well as soils, brownfield sites and agricultural land.		
	Policy D4	We would like to see some wording on the discouragement of new developments being connected to the gas grid. Or this could be phrased in terms of encouraging electrically powered hot water and heating (e.g. air source heat pumps). New homes that are heated through gas boilers will need retrofitting to be compatible with net-zero carbon so designing in electric heating and hot water now will avoid this additional work and costs for residents.	Agreed.	Policy D4 (c) to be updated
	Policy EM1	We would like to see this policy include a requirement for installation of EV chargers at commercial sites. Or, at the very least, passive EV chargers whereby the infrastructure is installed at the point of development but not necessarily the chargers themselves. Again, this will future proof any developed employment sites.	Agreed.	Policy EM1 (b) to be updated
45 Leicestershire County Council	Page 55 - 57	<u>Archaeology and the Historic Environment</u> Specific Comments Please refer to email correspondence with Chair of the Neighbourhood Planning Group.	Thank you. We are following this advice and will separate out the considerations of Listed Buildings, NDHA's, landforms and archaeology.	Change to be made as indicated.
	General Comments	<u>Archaeology and the Historic Environment</u> The planning process provides one of the most effective tools to manage the impact of land use change upon the historic environment. This is achieved both through the shaping of development plans (Local and Neighbourhood Plans) and the delivery of development management advice on individual planning applications. In that context, the inclusion of heritage in your Neighbourhood Plan, and the provision of relevant and effective policies, will significantly strengthen the management of these issues, and will be an effective way of the community identifying its own concerns and priorities. Ideally, Neighbourhood Plans should seek to work in partnership with other agencies to develop and deliver this strategic objective, based on robust local evidence and priorities. We recommend that each Neighbourhood Plan should consider the impact of potential development or management decisions on the conservation and enhancement of the historic environment. The historic environment is defined as comprising all aspects of the environment resulting from	These general comments are noted.	None

		<p>the interaction between people and places through time, including all surviving evidence of past human activity, whether upstanding, buried or submerged, as well landscapes and their historic components.</p> <p>The Leicestershire and Rutland Historic Environment Record (LRHER) can provide a summary of archaeological and historic environment information for your Neighbourhood Plan area. This will include gazetteers and maps describing the locally identified non-designated heritage assets, typically archaeological sites (both earthworks and buried archaeological remains), unlisted historic buildings and historic landscapes (parks and gardens). We will also provide information on medieval ridge and furrow earthworks to help you evaluate the surviving earthworks in your area.</p> <p>Information on Designated assets (Scheduled Monuments, Listed Buildings, Registered Parks and Gardens, Battlefields) is available from the National Heritage List for England (NHLE). https://historicengland.org.uk/listing/the-list/</p> <p>Consideration of the historic environment, and its constituent designated and non-designated heritage assets, is a material consideration in the planning process. While the data held by the LRHER is constantly maintained and updated, it is unlikely that the record represents an exhaustive list of all assets with the plan area. We suggest that information provided by the LRHER should be taken into account when preparing the Neighbourhood Plan and contribute to any list of locally identified heritage assets. Based upon a structured assessment process, this will be the basis of any non-designated heritage assets identified within the plan and given force through the preparation of appropriate heritage policy.</p> <p>Contact: her@leics.gov.uk or phone 0116 305 8323</p> <p>For help with including heritage in your Neighbourhood Plan please see the following guidance: CBA Toolkit No. 10, Neighbourhood Planning (2017) https://www.archaeologyuk.org/asset/6FE3A721-B328-4B75-9DEBBD0028A4AEED/</p> <p>National Trust Guide to Heritage in Neighbourhood Plans (2019)</p>		
45	General Comments	Climate Change	These general comments are noted.	None

Leicestershire County Council	Page 52 - 60	<p>The UK Met Office predicts that in a business-as-usual (high emission) scenario, Britain could experience summers as much as 5°C hotter by 2070. Winters could be up to 4.2°C warmer, and sea levels could rise by up to 1.15 metres by 2100, leaving the UK coastline unrecognisable. Average summer rainfall could decrease by up to 47% by 2070, while there could be up to 35% more precipitation in winter. In June 2019 the Climate Change Act (2008) was amended committing the UK to achieving net zero carbon emissions by 2050. Achieving this will require households, communities, businesses and local authorities to be fully engaged and aligned with this government policy.</p> <p>The County Council, through its Environment Strategy and Net Zero Strategy and Action Plan, is committed to tackling climate change and lowering carbon emissions. The Council has a target to achieve net zero for its own operations by 2035 and working with Leicestershire people and organisations to become a net zero county by 2050. Along with most other UK local authorities, the council has declared a climate emergency and wants to play its part to help meet the Paris Agreement and keep global temperature rise to well below 2oC Leicestershire’s Net Zero Strategy and Action Plan is available here: Net Zero Leicestershire strategy, action plan and reports Leicestershire County Council</p> <p>Planning is one of the key levers for enabling these commitments to be met. Neighbourhood Plans should, as far as possible, align to Leicestershire County Council’s Net Zero Strategy and Action Plan by contributing to and supporting a reduction in greenhouse gas emissions and reducing the county’s exposure to the worst effects of climate change.</p> <p>Furthermore, Neighbourhood Plans should, as far as possible, seek to include measures which increase the neighbourhoods resilience to climate change such as avoiding building on flood plains, using sustainable urban drainage systems, using nature based solutions to reduce flood risk, reducing the amount of non-permeable hard surfaces and encouraging tree planting, green walls and roofs to provide natural shading and cooling.</p> <p><u>The National Planning Policy Framework (NPPF): Meeting the challenge of climate change, flooding and coastal change – paragraphs 157 to 179.</u></p>		
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		<p><i>Para 157 - The planning system should support the transition to a low carbon future in a changing climate, taking full account of flood risk and coastal change. It should help to: shape places in ways that contribute to radical reductions in greenhouse gas emissions, minimise vulnerability and improve resilience; encourage the reuse of existing resources, including the conversion of existing buildings; and support renewable and low carbon energy and associated infrastructure.</i></p>		
<p>45 Leicestershire County Council</p>	<p>General Comments</p>	<p><u>Landscape</u> The County Council would like to see the inclusion of a local landscape assessment taking into account: Natural England's Landscape character areas; the Leicestershire, Leicester and Rutland Historic Landscape Characterisation Project; the Local District/Borough Council landscape character assessments; and the Landscape Sensitivity and Green Infrastructure Study for Leicester and Leicestershire (2017), which examines the sensitivity of the landscape, exploring the extent to which different areas can accommodate development without impacting on their key landscape qualities.</p> <p>We would recommend that Neighbourhood Plans should also consider the street scene and Midlands' public realm within their communities, further advice can be found in the latest 'Streets for All East document (2018) published by Historic England Streets for All: East Midlands Historic England</p> <p>For more information on place-making within new development please review Manual for Streets and Manual for Streets 2 Wider Applications of the Principles. Leicestershire County Council are in the process of producing an updated Leicestershire Highways Design Guide which will concisely take account of and reference these guides and others.</p> <p>LCC would encourage the development of local listings as per the National Planning Policy Framework (NPPF) and LCC have some data on the social, cultural, archaeological and historic value of local features and buildings. Historic Environment Record Leicestershire County Council</p> <p>Examples of policy statements for Landscape: POLICY X: LOCAL LANDSCAPE CHARACTER AREAS – Development proposals falling within or affecting the Local</p>	<p>These general comments are noted.</p>	<p>None</p>

		Landscape Character Areas (LLCAs), where possible, enhance the LLCA's particular characteristics, important views and local distinctiveness. Proposals having a harmful effect on a Local Landscape Character Area's character will not be supported. Landscape Assessment is a specialist area and accredited landscape consultants can provide advice. https://www.landscapeinstitute.org/		
45 Leicestershire County Council	General Comments	<p><u>Biodiversity</u></p> <p>The Natural Environment and Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, in the exercise of their duties, to the purpose of conserving biodiversity. The National Planning Policy Framework (NPPF) 2023 clearly outlines the importance of sustainable development alongside the core principle that planning should contribute to conserving and enhancing the natural environment, providing net gain for biodiversity, and reducing pollution. Neighbourhood Plans should therefore seek to work in partnership with other agencies to develop and deliver a strategic approach to protecting and improving the natural environment based on local evidence and priorities. Each Neighbourhood Plan should consider the impact of potential development or management of open spaces on enhancing biodiversity and habitat connectivity, such as hedgerows and greenways. Habitat permeability for species which addresses encouragement of movement from one location to another such as the design of street lighting, roads, noise, exposure to chemicals, obstructions in water, exposure of species to predation, Invasive and Non-Native Species, and arrangement of land-uses should be considered.</p> <p>The Neighbourhood Plan can be used to plan actions for the parish council on its' own land (community actions) and guide the actions of others (policy actions). refer For specific advice on species and habitats of importance in the County and actions that can make a difference to their conservation and ways to increase the quality and quantity of these, please to the Leicestershire and Rutland Biodiversity Action Plan</p> <p>Biodiversity Strategy Leicestershire County Council</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 ponds with high potential to support great crested newts'</p>	These general comments are noted.	None

		<p>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: LRERC@leics.gov.uk</p> <p>Leicestershire and Rutland Environmental Records Centre (LRERC) Leicestershire County Council</p> <p>For informal advice on actions for nature that can be taken forward on parish land please contact EnvironmentTeam@Leics.gov.uk</p> <p>There are many protected species of plants and animals in England and often their supporting features and habitats are also protected. What you can and cannot do by law varies from species to species and may require a preliminary ecological appraisal. For information on protected species and the law please visit: Protected species and development: advice for local planning authorities - GOV.UK</p> <p>Examples of policy statements that can be added to the plan to support biodiversity: POLICY X: BIODIVERSITY PROTECTION IN NEW DEVELOPMENT – Consideration should be made in the design and construction of new development in the Plan Area to protect and enhance biodiversity, where appropriate, including:</p> <ul style="list-style-type: none"> • Roof and wall construction should incorporate integral bee bricks, bird nest boxes and bat breeding and roosting boxes. Target species and locations to be based on advice sought from the Local Authority’s Biodiversity Officer (or equivalent). • Hedges (or fences with ground-level gaps) should be used for property boundaries to maintain connectivity of habitat for hedgehogs and other terrestrial animals. • Work with landowners to ensure good maintenance of existing hedgerows, gap up and plant new hedgerows where appropriate and introduce a programme of replenishing hedgerow trees. • Avoidance of all unnecessary exterior artificial lighting: there is no legal duty requiring any place to be lit. • Security lighting, if essential, should be operated by intruder sensors and illuminated for no longer than 1 minute. Sports and commercial facility 		
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		<p>lighting should be switched off during agreed ‘curfew’ hours between March and October, following best practice guidelines in Bats and Lighting Leicestershire Environmental Records Centre, 2014.</p> <ul style="list-style-type: none"> • Lighting design, location, type, lux levels and times of use should follow current best practice, e.g. by applying the guidelines in Guidance note 08/18 Bats and artificial lighting in the UK: Bat Conservation Trust / Institution of Lighting Professionals, 2018. • Natural/semi natural grassland margins adjacent to hedges of up to 5m buffer. • Retain natural features wherever possible. • In creating habitats, consider the underlying geology and allow natural colonisation near local high-quality habitats. • Avoid use of topsoil to promote plant diversity, especially in areas of limestone or areas near to heathland - consider exposing sandy soils to encourage acid grassland and heath. • Allow for structural diversity of habitats – for example long and tall grass, to maintain a suitable grassland habitat for wildlife. A management plan should accompany all planning applications. • Avoid development and hard landscaping next to watercourses. • Restore naturalness to existing watercourses for example by retaining some steeper earth banks suitable for Kingfisher and Water Vole breeding. • Retain areas of deadwood within the site to maintain biodiversity. • Plant 30% of trees with a selection of larger native species and create lines of trees (this could support the feeding zone of bats for instance and well managed hedges can do the same). 		
45 Leicestershire County Council	General Comments	<p><u>Green Infrastructure</u></p> <p>Green infrastructure (GI) is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities (NPPF definition). 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 rain gardens, pocket parks and swales.</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</p>	These general comments are noted.	None

		<p>strong, competitive economy; creating a sense of place and promoting 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 and historic environment. Looking at the existing provision of GI networks within a community can influence the plan for creating & enhancing new networks.</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>Sites that are designated as Local Green Spaces can form an important strategic part of local Green Infrastructure and can be conserved and enhanced to make an important contribution to the district green infrastructure. Delivery of the conservation and enhancement can be dealt with in Policy and Community Actions.</p> <p>NPs should be aware of the emerging Local Nature Recovery Strategy for Leicester, Leicestershire and Rutland to consider how the sites and the management of them within the Neighbourhood area can contribute to the strategy and action for delivery.</p> <p>What a Local Nature Recovery Strategy is Leicestershire County Council</p>		
45 Leicestershire County Council	General Comments	<p><u>Brownfield, Soils and Agricultural Land</u></p> <p>The NPPF encourages the effective use of brownfield land for development, except where this would conflict with other policies in the NPPF Framework, including causing harm to designated sites of importance for biodiversity. Neighbourhood planning groups should check with Defra and the District or Borough council who keep a register of brownfield sites to see if their neighbourhood planning area includes brownfield sites. Where information is lacking as to the ecological or heritage value of these sites then the Neighbourhood Plan could include policies that ensure such survey work should be carried out to assess the ecological and heritage value of a brownfield site before development decisions are taken.</p>	These general comments are noted.	None

		<p>Soils are an essential finite resource on which important ecosystem services, such as food production, are dependent on. They should be enhanced in value and protected from adverse effects of unacceptable levels of pollution. Within the government's "Safeguarding our Soils" strategy, Defra have produced a code of practice for the sustainable use of soils on construction sites which could be helpful to neighbourhood planning groups in preparing environmental policies.</p> <p>High quality agricultural soils should, where possible, be protected from development and where a large area of agricultural land is identified for development poorer quality areas should be used in preference to the higher quality areas. Neighbourhood planning groups should consider mapping agricultural land classification within their plan to enable informed decisions to be made in the future. Natural England can provide further information and Agricultural Land classification and have produced the following guide. Guide to assessing development proposals on agricultural land - GOV.UK</p> <p>The British Society for Soil Science provide advice on what should be expected of developers in assessing land for development suitability. Assessing Agricultural Land - Jan 2022</p>		
45 Leicestershire County Council	General Comments	<p>Strategic Environmental Assessments (SEAs) Information for Neighbourhood Planning groups regarding Strategic Environmental Assessments (SEAs) can be found on the Neighbourhood Planning website Understand if your plan requires a Strategic Environmental Assessment (SEA) - Locality Neighbourhood Planning and should be referred to. A Neighbourhood Plan must meet certain basic conditions in order to be 'made'. It must not breach and be otherwise compatible with the Environmental Assessment of Plans and Programmes Regulations SI 2004/1633 (available online). These regulations deal with the assessment of environmental plans and programmes, and implement Retained Reference Directive 2001/42 'on the assessment of the effects of certain plans and programmes on the environment'.</p> <p>Not every Neighbourhood Plan needs a SEA; however, it is compulsory to provide when submitting a plan proposal to the local planning authority either:</p> <ul style="list-style-type: none"> • A statement of reasons as to why SEA was not required • An environmental report (a key output of the SEA process). 	These general comments are noted.	None

		<p>As a rule, SEA is more likely to be necessary if both of the following two elements apply:</p> <ul style="list-style-type: none"> • a Neighbourhood Plan allocates sites for development (for housing, employment etc.); and • the neighbourhood area contains sensitive environmental assets (e.g. a Site of Special Scientific Interest (SSSI) or an Area of Outstanding Natural Beauty (AONB)) that may be affected by the policies and proposals in the Neighbourhood Plan. <p>In light of these two considerations, it is very unlikely that a Neighbourhood Plan would require SEA if the plan is not allocating land for development. This is because allocating land for development is more likely to generate physical changes which lead to significant effects.</p> <p>As the UK has now left the EU, Neighbourhood Planning groups should remain mindful of any future changes which may occur to the above guidance. Changes may be forthcoming as a result of the Government's Levelling Up and Regeneration Act (LURA). This proposes 'Environmental Outcome Reports' to replace the current system of Strategic Environmental Assessment (including Sustainability Appraisals) and Environmental Impact Assessment and introduce a clearer and simpler process where relevant plans and projects (including Nationally Significant Infrastructure Projects) are assessed against tangible environmental outcomes. Prior to the new Labour government taking office, the provisions in the Act to enable the EORs to be brought forward had not been enacted and this remains the situation as of summer 2024.</p>		
45 Leicestershire County Council	General Comments	<p><u>Impact of Development on Household Waste Recycling Centres (HWRC)</u></p> <p>Neighbourhood planning groups should remain mindful of the interaction between new development applications in a district and borough area and the existing HWRC services delivered by Leicestershire County Council. The County Council's Waste Management team considers the impact of increased waste arisings from proposed developments on a case by case basis and when it is identified that a proposed development will have a detrimental effect on the local HWRC infrastructure then appropriate projects to maintain the capacity of the HWRC (most likely impacted) have to be initiated.</p>	These general comments are noted.	None

		<p>Planning obligations to fund these projects are requested in accordance with the Leicestershire County Council's Planning Obligations Policy and the three CIL tests (as per Regulation 122 under the Community Infrastructure Regulations 2010 (as amended)) as described below;</p> <p>A planning obligation is a legally enforceable commitment (secured within a Section 106 agreement or S106 unilateral undertaking (as per s106 of the Town and Country Planning Act 1990 (as amended)) entered into to mitigate the impacts of development. Planning obligations can only be sought (and considered to be CIL compliant) where they meet the following 3 tests:</p> <ul style="list-style-type: none"> • necessary to make the development acceptable in planning terms; • directly related to the development; • fairly and reasonably related in scale and kind to the development; 		
45 Leicestershire County Council	General Comments	<p><u>Public Health</u></p> <p>Health is shaped by many different factors throughout our lives. Health is affected by the settings in which we live, work, learn and play. These influences start to determine health and opportunities for better health from birth and throughout the whole life course, for example the environment, community, transport, education and income.</p> <p>This complex range of interacting social, economic and environmental factors are known as the wider determinants of health or the social determinants of health.</p> <p>When there is a difference in these conditions it contributes to health inequalities- "Health inequalities are the preventable, unfair and unjust differences in health status between groups, populations or individuals that arise from the unequal distribution of social, environmental and economic conditions within societies" (NHS England)</p> <p>The diagram below illustrates types of wider factors that influence an individual's mental and physical health. (Refer to Files).</p> <p>The diagram shows:</p> <ul style="list-style-type: none"> • personal characteristics at the core of the model and this includes sex, age, ethnic group, and hereditary factors 	These general comments are noted.	None

		<ul style="list-style-type: none"> • The layer around the core contains individual ‘lifestyle’ factor behaviours such as smoking, alcohol use, and physical activity • The next layer contains social and community networks including family and wider social circles • The next layer covers living and working conditions include access and opportunities in relation to jobs, housing, education and welfare services • The final outer layer is general socioeconomic, cultural and environmental conditions and includes factors such as disposable income, taxation, and availability of work <p>Research by the Robert Wood Johnson Foundation, looked into the major contributors to health and wellbeing and found that:</p> <p>Health Behaviours contribute to 30% of health outcomes made up of:</p> <ul style="list-style-type: none"> • Smoking 10% • Diet/Exercise 10% • Alcohol use 5% • Poor sexual health 5% <p>Socioeconomic Factors contribute to 40% of health outcomes:</p> <ul style="list-style-type: none"> • Education 10% • Employment 10% • Income 10% • Family/Social Support 5% • Community Safety 5% <p>Clinical Care contributes to 20% of health outcomes:</p> <ul style="list-style-type: none"> • Access to care 10% • Quality of care 10% <p>Built Environment contributes to 10% of health outcomes:</p> <ul style="list-style-type: none"> • Environmental Quality 5% • Built Environment 5% <p><i>Source: Robert Wood Johnson Foundation and University of Wisconsin Population Health Institute, Used in US to rank Counties by health Status</i></p>		
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		<p>Therefore, due to the complex way in which the built environment and communities we live in impact on our health any opportunity to mitigate negative impacts and enhance positive outcomes should be taken. Completing a Health Impact Assessment (HIA) is a good practice to ensure neighbourhood concerns and recommendations are considered.</p> <p>Undertaking a HIA as part of your neighbourhood plans has the potential to influence all these areas, alongside influencing decisions made about access to care through transport and infrastructure. To aid you in undertaking a HIA please visit: Health Impact Assessment - Healthy Place Making</p> <p>At the bottom of this page there are also links to a number of local data sheets at a district level. You can also familiarise yourself with the health profile for your area by visiting: Local Authority Health Profiles Fingertips Department of Health and Social Care</p>		
45 Leicestershire County Council	<p>General Comments</p> <p>Pages 48</p>	<p><u>Communities</u></p> <p>Consideration of community facilities is a positive facet of Neighbourhood Plans that reflects the importance of these facilities within communities and can proactively protect and develop facilities to meet the needs of people in local communities. Neighbourhood Plans provide an opportunity to;</p> <ol style="list-style-type: none"> 1. Carry out and report on a review of community facilities, groups and allotments and their importance with your community. 2. Set out policies that seek to; <ul style="list-style-type: none"> • protect and retain these existing facilities, • support the independent development of new facilities, and, • identify and protect Assets of Community Value and provide support for any existing or future designations. 3. Identify and support potential community projects that could be progressed. <p>You are encouraged to consider and respond to all aspects of community resources as part of the Neighbourhood Planning process. Further information, guidance and examples of policies and supporting information is available at Useful Information Leicestershire Communities</p>	These general comments are noted.	None
45	<p>General Comments</p>	<u>Economic Development</u>	These general comments are noted.	None

Leicestershire County Council	Page 44	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.		
45 Leicestershire County Council	General Comments Page 50 -51	<p><u>Fibre Broadband</u></p> <p>Our ambition is for a Digital Leicestershire. This includes the ambition for everyone to have access to fast, accessible, inclusive, reliable digital infrastructure and we are working to support government targets to achieve gigabit capable, lightning-fast broadband connections to 85% of the UK by December 2025, increasing to near universal coverage by 2030.</p> <p>A fast and reliable digital infrastructure will open new opportunities for residents, communities and businesses. It will underpin innovation, improve community and social networks and support learning and development for all. It will help to deliver a range of societal benefits including the more effective provision of public services, information and connect people to the support at the point of need.</p> <p>The Digital Leicestershire team manages programmes aimed at improving digital infrastructure in the county. This includes superfast, ultrafast and full fibre broadband. This work combines three approaches; engaging with commercial operators to encourage private investment in Leicestershire, working with all tiers of government to reduce barriers to commercial investment, and operating intervention schemes with public funds to support deployment of digital infrastructure in hard-to-reach areas that are not included in broadband suppliers' plans, reaching parts of the county that might otherwise miss out on getting the digital connectivity they need. We are currently providing support throughout the county with our Gigabit and Gigahub programmes.</p> <p>How does this role relate to neighbourhood plans? The UK government has brought into force new laws that require new homes in England to be built with gigabit broadband connections and enables telecoms firms to be able to get faster broadband to nine million people living in blocks of flats across the UK.</p> <p>Ministers have amended the Building Regulations 2010 to ensure that new homes constructed in England will be fitted with infrastructure and connections capable of delivering gigabit broadband - the fastest internet speeds on the market.</p>	These general comments are noted.	None

		<p>The updated regulations mean that more people moving into new homes will have a gigabit capable broadband connection ready when construction is completed, avoiding the need for costly and disruptive installation work after the home is built and enabling residents to arrange the best possible internet service at the point they move in.</p> <p>In a further boost to people's access to better broadband, another new law has made it easier to install faster internet connections in blocks of flats when landlords repeatedly ignore requests for access from broadband firms.</p> <p>Both of these new laws came into effect on 26 December 2022.</p> <p>The updated building rules mean home developers will be legally required to future-proof new homes in England for next-generation gigabit broadband as standard practice during construction.</p> <p>Connection costs will be capped at £2,000 per home for developers and they will work together with network operators to connect developments to the gigabit network. It is estimated over 98 per cent of premises fall within this cap, meaning moving into a new build property without lightning-fast internet speeds will become a thing of the past for the vast majority of people across England.</p> <p>Where a developer is unable to secure a gigabit-capable connection within the cost cap, developers must install the next fastest connection available.</p> <p>And even where a gigabit-capable connection is not available within the cost cap, gigabit-ready infrastructure, such as ducts, chambers and termination points, still needs to be installed. This will ensure that homes are fit for the digital age but may not be connected straight away.</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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		Groups working on emerging neighbourhood plans are encouraged to visit the Digital Leicestershire web site to learn more about current and forthcoming full fibre broadband provision for their local area https://www.thinkbroadband.com/ and also BDUK (Building Digital UK). Further Information Home - Digital Leicestershire Building Regulations: Approved Document R Volume 1: Physical infrastructure and network connection for new dwellings		
45 Leicestershire County Council	General Comments	<p><u>Equalities</u></p> <p>While we cannot comment in detail on plans, you may wish to ask stakeholders to bear the Council's Equality Strategy 2020-2024 in mind when taking your Neighbourhood Plan forward through the relevant procedures, particularly for engagement and consultation work.</p> <p>The Neighbourhood plan should comply with the main requirements of the Public Sector Equality Duty. This requires public bodies to have due regard of the need to:</p> <p>Eliminate discrimination</p> <p>Advance equality of opportunity</p> <p>Foster good relations between different people</p>	These general comments are noted.	None
45 Leicestershire County Council	General Comments	<p><u>Accessible Documents</u></p> <p>In today's working environment more and more information is being produced digitally. When producing information which is aimed at or to be viewed by the public, it is important to make that information as accessible as possible. At least 1 in 5 people in the UK have a long-term illness, impairment or disability. Many more have a temporary disability.</p> <p>Accessibility means more than putting things online. It means making your content and design clear and simple enough so that most people can use it without needing to adapt it, while supporting those who do need to adapt things.</p> <p>For example, someone with impaired vision might use a screen reader (software that lets a user navigate a website and 'read out' the content), braille display or screen magnifier. Or someone with motor difficulties might use a special mouse, speech recognition software or on-screen keyboard emulator.</p> <p>Public sector organisations have a legal requirement to make sure that all information which appears on their websites is accessible. As Neighbourhood Plans</p>	Noted	None

		<p>have to be published on Local Planning Authority websites, they too have to comply with Understanding accessibility requirements for public sector bodies - GOV.UK Guidance for creating accessible Word and PDF documents can be found on the Leicestershire Communities website: Accessibility Leicestershire Communities</p> <p>To enable Development Officers to implement your policies, it is important to make sure that they are clear, concise and worded in such a way that they are not open to interpretation. This Policy Writing Guide has been designed to provide you with a few key points to look out for.</p>		
46 Pegasus Group	General Comments	<p>1. Introduction These representations are made on behalf of Parker Strategic Land (PSL) and relate to PSL's Land interests at Houghton the Hill.</p> <p>PSL have long promoted their land as a sustainable development option for the village, with the potential to deliver a range of community benefits that meet with the aspirations of residents as reflected in the emerging Plan's Vision and Objectives.</p> <p>There are currently three live planning applications before Harborough District Council for determination. Application 1 (App 1 – 23/01499/OUT) relates to the whole extent of the PSL land interest both North and South of the A47 to the East of the village and offers a comprehensive scheme which maximises the potential benefits deliverable to the village through its development, and includes some local shop provision a care home and a GP surgery. The Application Boundary and Illustrative masterplan for its development are attached at Appendix 1. Application 2 (App 2 - 23/01810/OUT) relates solely to their land interests North of the A47, and Application 3 (App 3 – 24/00175/OUT) relates solely to their land South of the A47, both these applications are focussed exclusively on residential delivery. Site and illustrative layout plans for applications 2 and 3 are attached at Appendix 2 and 3 respectively.</p> <p>Neighbourhood Plans (NPs) can set out policies and proposals for development of land within their area, and once 'made' they form part of the Development Plan relating to the area. To be considered acceptable by an independent Examiner,</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p> <p>Noted</p>	<p>None</p> <p>None</p> <p>None</p> <p>None</p>

		<p>Neighbourhood Plans must conform to a number of 'Basic Conditions' as set out paragraph 8(2) of Scheduled 4B to the Town and Country Planning Act 1990 (as amended).</p> <p>A draft order meets the basic conditions if —</p> <p>(a) having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order,</p> <p>(b) having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order,</p> <p>(c) having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order,</p> <p>(d) the making of the order contributes to the achievement of sustainable development,</p> <p>(e) the making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area),</p> <p>(f) the making of the order does not breach, and is otherwise compatible with, assimilated (i.e. EU) obligations, and</p> <p>(g) prescribed conditions are met in relation to the order and prescribed matters have been complied with in connection with the proposal for the order.</p>		
		1.6- PSL contend that the Houghton on the Hill (HotH) Neighbourhood Plan fails to address the Basic Tests , specifically that it does not contribute to meeting the aims of sustainable development (and fails to deliver development to achieve its own Objectives in this regard), and that it is not in conformity with the strategic policies in the Development Plan, nor does it meet with national policy.	We disagree strongly with this statement.	None
		1.7- A new and updated National Planning Policy Framework (NPPF), has been published on the 12th December 2024, references to the NPP in these representations are to the current December 2024 version. Moreover, the Harborough District Council will be consulting on their new Regulation 19 version	The NDP will be amended to reflect the new NPPF published in December 2024,	Change to be made as indicated.

		<p>Local Plan in February 2025, and this NP ought properly to ensure consistency with the requirements of the emerging plan as a material consideration of some weight. In this regard, the timing of the Regulation 14 draft is considered premature, ahead of being able to have addressed the new national guidance which includes, inter alia, guidance on housing requirements going forward for Harborough District. It is also premature ahead of the new Local Plan progressing.</p>	<p>although there were no surprises in the published draft. The NDP will also be amended to refer to the Regulation 19 version of the Local Plan, however close dialogue took place with HDC throughout the preparation of the NDP to date and key issues such as housing requirements were signalled in advance and incorporated into the Regulation 14 draft.</p>	
		<p>1.8- There is a very real risk that this Neighbourhood Plan will, at worst, be 'out of date' before it is Made, or at best be 'out of date' very shortly after it is Made. NPPF para 31 establishes that where a Local Plan is approved after a NP is Made, then if there are conflicting non-strategic policies it is the Policies in the Local Plan which take precedence. Whilst entirely a matter for the NP Working Group as to when it brings forward its new NP, it would seem to be a more prudent use of resources to allow the Local Plan to progress first, to minimise the risk of NP policies becoming out of date very shortly after being Made, and thereby negating the benefit of the Neighbourhood Planning exercise.</p>	<p>This interpretation is wrong. The NDP will not be out of date on the adoption of the new Local Plan, which is somewhat off, it is purely the status of any conflicting non-strategic policies as referenced in the comment, which we anticipate to be few and minor, if any at all.</p> <p>Planning Practice Guidance (Paragraph: 009 Reference ID: 41-009-20190509) confirms that neighbourhood plans can come forward</p>	None

			'before or at the same time as the local planning authority is preparing its Local Plan'.	
		1.9- These Representations review in Section 2 the Evidence Base, and in particular the factual errors and inconsistency in assessment of sites promoted for allocation. It is concluded that the Site Assessment process fails to assess sites on a fair, or equitable footing, thereby failing on its own defined terms, which are said to be important. Section 3, reviews individual policies within the NP and passes commentary upon them, and finally Section 4 provides a brief summary and conclusion, finding that the Neighbourhood Plan fails to meet with the Basic Conditions.	Site assessments were undertaken by AECOM, an independent professional organisation, who were appointed to the task by Locality. It is not a surprise that a disappointed developer considers its land interest to be more suitable than any other, but this is not the outcome of the assessment undertaken.	None
46 Pegasus Group	Evidence Base	<p>2. The Evidence Base</p> <p>Concerns are raised regarding the approach taken to specific aspects of the evidence base, which are internally inconsistent, with regard to treatment of different sites, and also, lacking in critical analysis for some of the key conclusions reached, especially with regard to Older Persons Housing.</p> <p>Just by way of clarity the following nomenclature is used in this representation:</p> <ul style="list-style-type: none"> • Site L3A or Site D refers to the proposed allocation north of the A47 to the west of Houghton. • Site L3B or Site E refers to the proposed allocation off Stretton Lane. • Site L3C or App 2 – refers to current and proposed Reserved Housing site north of the A47, East of Houghton and owned by PSL, and forms the southern half of Site F. 	<p>The Neighbourhood Plan has relied on the evidence provided by the independent and professionally qualified consultants, as has been the case in numerous neighbourhood plans across the country.</p> <p>The arguments against this need to be seen in this context.</p>	None

		<ul style="list-style-type: none"> • Site F refers to the whole of PSL's land to the north of the A47, east of the village, which includes the L3C allocation in its southern part, but extends beyond this. • Site H or App 3 refers PSL's land to the south of the A47, to the east of the village. • App 1 refers to the combined Sites F and H. 		
	Site Options and Assessment – Aecom December 2023	<p><u>Site Options and Assessment – Aecom December 2023</u></p> <p>2.3- The assessment of the PSL's sites, namely Sites F and Site H, is summarised at Table 5.1 and the following observations are made on that assessment, and the assessment proforma are made.</p> <p>2.4- The NP assessment was dated in December 2023. Whilst it therefore pre-dated two of the current 3 live planning applications across PSL's two parcels F and H, nonetheless the NP Working Group were aware of the potential to treat these sites individually, as well as on a current NP basis, as is now reflected in the three applications. In other words, the NP should have examined and assessed the relative merits of all 3 of the application options, all of which have been known to the NP Working Group since February 2024, which has been more than ample time to update the evidence base assessment to include all three options, each of which provides a slightly differing mix of opportunities and benefits.</p>	<p>The respondent earlier talks about assessing sites on a 'fair or equitable' basis, but now seeks special treatment for their sites.</p> <p>There would be criticism if it were to do so – the NDP group is entirely correct to work on the basis of the information originally submitted as it has with each site under assessment.</p>	None
		2.5- It is considered that the NP should be providing for a greater housing requirement, in focusing solely on a strategy of a presumed need of 55 to 70 homes, it does not properly assess the sustainability potential, and benefits achievable, from an allocation which would deliver additional housing, better aligned to the growth, which is required by the new NPPF, and of Harborough District moving forward.	The NDP is required to meet the housing requirement provided by the local planning authority, which it has done. It is therefore legally compliant.	None
		<p>2.6- The following commentary from the Aecom report is noted;</p> <p><i>Executive Summary: The Neighbourhood Plan Working Party are working on the assumption that the expected requirement is currently in the range of 55-70 dwellings, but a definitive figure is not yet known.</i></p>	The assessments were carried out on the basis of the latest available information. The housing requirement figure has subsequently	None

		<p>1.2 It is important that the site assessment process is carried out in a transparent, fair, robust and defensible way and that the same process is applied to each potential site...</p> <p><i>1.10 ...The primary school provides for 4 to 11 year-olds.... Demand for places is high with about half the pupils coming into the village from outside the catchment area...</i></p> <p><i>3.22 [Harborough Local Plan 2011-2031] SS1 The Spatial Strategy...Rural Centres are identified as a focus for rural development, to serve both the settlements themselves and the surrounding rural area... [emphasis added]</i></p>	been confirmed by HDC.	
		<p>2.7- The NPPF and accompanying papers propose an uplift in the Standard Methodology (SM) housing requirement for Harborough from 510 homes/yr to 709 homes/yr. In his Plan for Change Speech on 5 December 2024, the Prime Minister doubled down on his commitment to deliver 1.5m new homes during the life of this parliament (source: https://www.gov.uk/government/speeches/pm-speech-on-plan-for-change-5-december-2024). This is a material consideration, for the housing requirement of Harborough District, and equally for those settlements within the growth hierarchy, such as HoTH.</p>	<p>Noted. The NDP is working on the basis of the housing requirement figure agreed with HDC.</p> <p>The figure has since been confirmed by HDC following the publication of the NPPF.</p>	None
46 Pegasus Group	Site H (App 3)	<p>2.8- The Table 5.1 summary analysis for site H, the App 3 site, currently indicates that it is unsuitable for development. This is based on an incorrect statement that it lacks suitable access. Access to the site has been approved already, in relation to proposals for the adjoining Golf Club development. As the current application proposals make clear, that access is capable of construction in its own right, independent of the Golf Club, and delivers a wider benefit and improvement to Highway Safety through the closure of the existing Gaulby Lane/A47 junction, which is considered sub optimal in terms of safety – to the benefit of all road users.</p>	<p>The aecom assessment also concluded that the site is distant from services and has high sensitivity in terms of residential amenity which also contributes to the conclusion of unsuitability. Access was not the only reason given.</p>	None
		<p>2.9- For the avoidance of doubt, the current applications seek approval for the same road junction configuration as approved under the golf course consent, ensuring that the necessary highway infrastructure can be delivered independently of the golf</p>	Noted	None

		course. Furthermore, the approval of the golf course application demonstrates the acceptability of these highway proposals.		
		2.10- None of this, including the substantial Highways benefits arising through the closure of the existing junction between Gaulby Lane and the A47 and which is considered to be dangerous, is factored into the Aecom Assessment. Other benefits, also not reviewed, are set out under the consideration of Policy L3C below.	The assessment was comprehensive as can be seen from the appendix supplied as part of the submission material for the NDP.	None
		2.11- Whilst the proforma states that the site is within the Kilby Foxton SSSI Impact Risk Zone and identifies that this requires 'consultation with Natural England' and therefore warrants an <u>Amber</u> rating, such a consultation has been undertaken with Natural England as part of the live application, and Natural England have not raised any objection. This should therefore be treated as a 'non-constraint' and rated <u>Green</u> .	The assessment was correct as at the time of its preparation -it is not feasible nor appropriate to update the report on an on-going basis. This subsequent change does not impact on the overall assessment.	None
		2.12- With regard to 'physical constraints' the site is said to have limited access for pedestrians, vehicles, or cyclists. However, this has no regard to the fact that an access road for the site (the Gaulby Lane/A47 link) is already approved and capable of implementation. Both Applications 1 and 3 look to deliver this route, in an identical fashion to that approved, and thus access for all modes, is wholly achievable.	Noted. This does not impact on the overall assessment	None
		2.13- Moreover, there is a clear local desire for the current informal pedestrian access to the adjoining Houghton Field Association Football Pitch, Play Park, and the Houghton Tennis club to be formalised (as evidenced by the current non-consensual usage). These facilities adjoin the Site, and an informal pedestrian access is already in existence. This is proposed to be formalised into a recreational route, through the current App 3.	Noted. This does not affect the overall view that alternative development sites are preferable.	None
		2.14- Compared to the NP allocated sites, access to these recreational facilities on foot or bicycle, from Site H is immediately adjoining. For example, instead of the 830m journey from Site D, including travel along the A47 corridor, Site H is immediately adjoining the facilities. Site E (Allocation L3B) is also off set from the heart of the village, and whilst closer to School and Church is at some 800m from these Leisure Facilities.	Recreational facilities are distributed throughout the village, not exclusively adjacent to site H.	None

		2.15- The potential for journey's to be made on foot/cycle to the key retail and leisure facilities from the PSL site H is therefore much greater than from the NP's preferred allocations site D and Site E. The SHELAA Review Table of Site D and E is wholly silent on this matter (NP Options and Assessments - Appendix B).	Recreational, leisure and retail facilities are distributed throughout the village.	None
		2.16- In addition, the same commentary can be made with regard to access to the current Village Co-op store, and facilities beyond (ie Village Hall, Church, Primary School). The Co-op is some 110m closer to Site H for a pedestrian desire line, than from allocated Site D, and then similarly to the facilities beyond. Site H is, in all respects, better related to the facilities at heart of the village than Site D. For Site E, the matter is more neutral as it is closer to the School and Cricket field, but is still 640 from the Co-op.	Recreational, leisure and retail facilities are distributed throughout the village.	None
		2.17- There is also an alleged ' <i>...potentially high visual sensitivity</i> ' (Table 5.1) of Site H. However, this is not supported by evidence, nor does it appear to have regard to the approved Golf Course permission immediately adjoining the site, which will materially alter the context in which the site is viewed in the wider landscape.	It is unclear whether the golf course will progress. We prefer to rely on the independent assessment by AECOM.	None
		2.18- The Aecom analysis is further unsupported by the Landscape and Visual Assessment accompanying the Planning Applications (a copy of which is attached as Appendix 4), and which was undertaken to a GLVIA3 methodology, unlike the assessment of the Aecom Report. This confirms that, with mitigation, the visual effects of the development after construction + 15 years, from homes on Uppingham Road and Firs Road, will be at worst 'Moderate/Minor Adverse', and from PROWs and Roads, at worst, 'Negligible'. The summary assessment that the site 'may have potentially high visual sensitivity', is therefore unsupported.	Noted, however this does not affect the overall suitability of the site compared to alternative options.	None
		2.19- With regard to Policy Constraints, whilst it is correct to note that the current Local Plan allocates the site for a Golf Course (and in so doing acknowledging a change to the landscape at this site), the assessment doesn't acknowledge that the approved Golf Course layout, does not seek to rely on this land in order to deliver the 18-hole layout.	Noted	None
		2.20- The Conclusions section of the appraisal is factually incorrect in stating that the site's delivery is dependent upon completion of the Golf Course development. Both developments, the housing and the Golf Course, are capable of independent	Noted, however this does not affect the overall suitability of the	None

		delivery, Whichever comes first will deliver the enhanced Gaulby Lane, A47 link road, and thus deliver the associated highway benefits.	site compared to alternative options.	
		2.21- The site's <u>Red</u> rating as being neither suitable, available, or achievable, is as a matter of fact, incorrect on all 3 counts.	We do not agree. This does not affect the overall suitability of the site compared to alternative options. A key reason for assessing the site as unsuitable is its separation from the main built area of the village.	None
		2.22- <u>The site is suitable</u> . The identified site H 'constraints' of Visual Impact and distant Access are demonstrably not factually correct, and indeed Site H is significantly better placed in this regard than the NP proposed allocation sites.	We do not agree. This does not affect the overall suitability of the site compared to alternative options. A key reason for assessing the site as unsuitable is its separation from the main built area of the village.	None
		2.23- NPPF 115 requires that sites which are allocated in in plans, should ensure, inter alia that opportunities to promote sustainable transport modes have been taken up. Moreover, plan making should consider transport issues so that environmental impacts of traffic and transport infrastructure can be taken into account, and appropriate opportunities taken for avoiding and mitigating adverse effects and for net environmental gains (NPPF 108).	Noted	None
		2.24- NPPF 187 requires consideration to be given to recognising the intrinsic character and beauty of the countryside. The evidence with regard to this has been offered in regard to the Site H site analysis), but no such equivalent analysis has been provided for the Site D or E analysis.	This does not affect the greater suitability of alternative sites.	None
		2.25- <u>The Site is available</u> . The Site is controlled by PSL and a live application is before the District Council, demonstrating the site's availability.	This does not affect the greater suitability of alternative sites.	None

		<p>2.26- <u>The Site is achievable</u>. Site access is readily achievable, using the already approved Gaulby/A47 link, which delivery will also deliver wider network benefits, currently unassessed by the Aecom report. Significantly, these were known at the point the assessment was undertaken, as the 'link' had already received planning permission. Further, formalising an existing informal pedestrian link as the Parish desire will, consistent with NPPF objectives, maximise the pedestrian accessibility of the site to the heart of the Village Centre and associated facilities, in a way in which the NP preferred allocations of Site D and E cannot. These differences have not been properly recorded in the assessments, and therefore consultation upon the options has been undertaken on a partial basis, which has the potential to have impacted how residents have engaged in the process.</p> <p>All of this information has been available to the NP working group through the live applications, for a period of at least 9 months prior to the NP consultation, and could have been incorporated into the analysis.</p>	<p>This does not affect the greater suitability of alternative sites.</p> <p>We do not expect the Examiner will require a re-run of the assessment process but will need to be satisfied that the allocated sites meet the Basic Conditions, which they do.</p>	None
46 Pegasus Group	Site F	<p>2.27- Whilst PSL are of the view that the whole site as promoted, is capable of delivery, the Aecom assessment should either have treated it as two separate parcels (green lighting the southern parcel which they acknowledge is capable of delivery), or, as they have done with the preferred allocation Site D, 'green lit' the whole site, but with a textual explanation that only half the site in their opinion, is capable of delivery. There is an inconsistency in the treatment of Site F and Site D's analysis.</p>	<p>We believe that sites F and D meet the Basic Conditions so are suitable as allocations in the NDP.</p>	None.
		<p>2.28- By treating the two sites differently in this way, the Aecom report fails on its own terms to make a 'fair' assessment with <i>'the same process applied to each site.'</i></p>	<p>PSL are suggesting that their sites are treated differently with updated information being added in as it becomes available. This is simply not practical or achievable.</p>	None
		<p>2.29- Table 5.1, in its summary of the allocated Site D, notes that this site needs to have access confirmed by the Highway Authority, that design will need to account for an impact on local landscape and visual sensitivity, and that only the Eastern half of the site can be developed. It is then rated <u>Green</u>. Further comments on the suitability of any site access are made in the Highway Technical Note submitted here as <u>Appendix 5</u>. The summary of Site F simply notes that the southern portion is</p>	Noted	None

		potentially suitable for housing, could deliver the required housing numbers, and can be accessed from the A47 (with no other caveats applied).		
		2.30- It is inconsistent to not rate Site F <u>Green</u> as well. This is what a <i>fair</i> and equitable assessment process would conclude. If the NP Group then wished to select one site over another to respond to local community wishes, that would be for the community to decide. However, a Plan which is consulted upon, based on a partial assessment, and which fails on its own terms to provide consultees with a fair, robust and defensible assessment process, cannot be a sound basis for a Plan to be brought forward. Further reference is made to how this impacts the requirements of the Basic Conditions in the Conclusions section of this representation.	We do not agree that the assessment undertaken by AECOM is partial. Ultimately, the community WILL decide on the basis of all the information before it, including these comments and responses.	None.
		2.31- Site F is assessed (as with Site D) as part of the carrying forward of the SHELAA analysis undertaken in 2021. The SHELAA review of Sites A – F did not undertake an analysis using the same metrics as has been used within the NP for Sites G-M. It would have been an appropriate and beneficial exercise to do so, in order that the same process was applied to each potential site.	The SHELAA assessed sites available at that time (A-F). The separate, and later, AECOM assessment covered all sites available at that time (A-M). Both were independent assessments and not obliged to use the same metrics.	None
		2.32- The Site F analysis made no reference or acknowledgement that the southern half of the site falls within the currently defined settlement boundary in the extant NP or that this area is identified in the current NP as a reserve housing site.	As above, both site assessment processes were conducted using future potential for sustainable housing rather than previous history.	None
		2.33- In any event the proposals now agreed with the County Council Highway's team in terms of access layout and configuration, both show the smaller southern parcel, and the wider complete parcel, with access solely from the A47, without a secondary access onto Ingarsby Lane. This thereby addresses previous concerns in	Noted. The assessment was based on information available at	None

		the 2021 SHELAA regarding closure of the existing Ingarsby Lane/Main Street junction. It was always in the gift of those undertaking the site assessment to have stipulated this 'requirement' in reaching a conclusion of the site acceptability, as they did with, for example, the requirement that development at Site D only occur to the east of the Gas pipeline, and Site E accommodates the Gas infrastructure. They did not however exercise that same level of discretion fairly to Site F.	the time it was undertaken.	
		2.34- As with Site H, the contradictory nature of the assessment and conclusions of Site D and E when compared to Site F are noteworthy. Specifically, with regard to matters of Highways. Attached at Appendix 5 to these representations is a Technical Highways note addressing the relative merits and assessment of the Site D and Site F. It highlights the inconsistency of approach and confirms that both the PSL parcels as promoted in App 1 perform substantially better in terms of proven acceptability, and delivering sustainability and safety improvements.	Noted	None
		2.35- It is noted that the previous SHELAA conclusion that 'Provision of suitable access arrangements to the existing highway could impact on the viability and achievability of the site', is made without any supporting evidence or justification. It is wrong for the NP Appendix B update, therefore, to conclude that the previous SHELAA conclusions are 'reasonable to be carried forward'. Whilst the existence of App 1 is noted, no reference is made to how this might impact the conclusions previously reached, nor how this sits with the NP assessment that the site's access may cause 'viability issues'. The assessment also ignores that Leicestershire County Highways have now confirmed that the proposed access arrangements are and appropriately designed and acceptable in this regard. Those designs also provide wider benefits to safety on the A47 corridor, as highlighted under consideration of L3C below.	It is noted that PSL disagree with both the SHELAA and AECOM site assessment conclusions. It is reasonable to use both assessments to help reach a recommendation on site allocations.	None
		2.36- Finally, having regard to the knowledge of the content of APP 1, the assessment has failed to weigh in its assessment how the delivery of retail, bungalows, Custom and self build, GP surgery and Care Home, would better meet the objectives of sustainable development, than the option promoted. This is a significant failing in the evidence base, which again impacts an assessment of whether the Basic Conditions have been addressed both in spirit and in word. The matter is referenced further below.	Retail: while the Coop would use a larger site if available, they are content with their current site. GP surgery: the local GP surgery has provided a written statement that it has no wish for premises on that site.	None

			<p>Care Home: The AECOM report recommends that a care home should be provided closer to a larger catchment area. A new Care Home is currently being built less than 2 miles away towards Leicester beside the A47.</p>	
		<p><u>Summary of Site Assessments</u></p> <p>2.38- In summary, the assessments undertaken are in effect ‘policy on’, they appear to have been drafted in a manner to support the allocation of Site’s D and E. Indeed, they appear to plainly disregard their own policy and settlement boundary which would clearly identify Site F as the preferred option. Neither do the assessments relate to the new NP’s Vision and Objectives. Had they been undertaken on a fairer and more robust basis, then an equitable treatment would have found additional sites, include those of PSL, also identified <u>Green</u>. This would have enabled a more equitable process of consultation and then site selection to have occurred. Contrary to the statement at NP para 83 – the assessments have not been ‘objective’.</p> <p>2.39- This impacts whether the Basic Conditions regarding identifying truly sustainable development options can have been fairly reached, or whether those same objectives in the NPPF, have been addressed.</p>	<p>The objective assessment honors the Basic Conditions by taking into account:</p> <ul style="list-style-type: none"> • The SHELAA report • The AECOM report • The results of the Community Questionnaire • The Stakeholder consultation • The emerging HDC Local Plan. <p>The Settlement Boundary has been adjusted to embrace allocated sites. The reserve site is outside the SB in line with planning advice.</p>	None
46 Pegasus Group	Housing Needs Assessment	<u>Housing Needs Assessment (HNA) – Aecom January 2024</u>	Noted	None

	(HNA) – Aecom January 2024	2.40- Comments on the HNA are kept restricted at this time, to Section 6 regarding Specialist Housing for older people. Commentary about Housing Requirement for the District, and HotH’s proportionate share of that, will alter following the publication of the NPPF, and PSL reserve the right to refer to this in the event that Examination Hearings are held.		
		2.41- Modelled projections of older people (75+) in HotH during the Plan period (Table 6.1) reflect a national trend. That is, there is going to be an increase in the 75+ population in absolute terms (in HotH from 262 persons to 407) but also that as a % of the village population, this will also increase from 12.5% to 17.5%.	Noted	None
		2.42-The HNA goes on to consider the need for specialist housing for older people including housing with care (estimated at 36/37 homes) and specifically for Care Homes identifies a locally generated need of 9 care home beds.	Noted	None
		2.43- PSL’s offer for the Village as set out in App 1, is to provide for between 25 and 35 bungalows to meet the needs of an aging community, and to provide the site with a Care Home, supported by additional community uses including a Convenience Store, and a GP surgery.	Noted	None
		2.44- This is significant because the HNA concludes at para 226, that HotH is ‘a less suitable location for specialist accommodation on the basis of accessibility criteria...’. Those criteria being access to services and facilities, public transport options, and the necessary workforce of carers. HNA Para 205, sets out a view that such accommodation would be best placed in a single centralised point (Leicester), in a hub and spoke model.	Noted	None
		2.45- Further commentary with regard to the inconsistency of encouraging the decanting of the Village’s elderly population into Leicester, against the stated NP Objectives of delivering: 1) Community Cohesion; nurturing health and well-being regardless of age, 3) Sustainable New Housing; to provide a balanced range of housing to meet the villages evolving demographic profile, 5) Enhance Services and Facilities;’ to enhance services and facilities, 9) Promote Employment; promote increased employment opportunities, is made in Section 3 below.	There is no inconsistency here. There are many ways that the NDP promotes the objectives stated, beyond the provision of a care home which the HNA suggests is inappropriately located in the Neighbourhood Area.	None
		2.46- It is sufficient to observe here, that the NP’s preferred allocations offer nothing toward meeting Objectives 1, 3 and 9 – all of which are offered by the PSL proposal. In addition, whilst any of the promoted sites, may meet requirements for M4(2) and	It is entirely the decision of the Qualifying Body as to whether it	None

		M4 (3) homes, the PSL site is the only site offering delivery of a Care Home (so the existing aging population can choose to stay in their own Village), and which has the local employment benefits associated with that, or has committed to the delivery of up to 35 bungalows for the village.	promotes the provision of specialist care facilities. The HNA concluded that such facilities were better placed elsewhere, but there are other ways of promoting community cohesion.	
		2.47- There is a disconnect between the NP's own evidence base, and the Plan strategy as promoted. Whilst the bar for Neighbourhood Plans in terms of supporting evidence is rightly not so burdensome as that required for a Local Plan's test of soundness, where a NP is progressed which even on its own evidential basis is not promoting a delivery of allocations which most readily addresses its own Objectives and requirements for sustainable development, then the Basic Conditions are unlikely to be satisfied. Specifically, that requiring regard to national policies and the achievement of sustainable development.	We disagree that the failure to support a care home reflects a disconnect with its objectives. The needs of older people can be met in many ways, including the promotion of more accessible residential dwellings.	None
		2.48- The NPPF (paras 7/8) is explicit that it is the purpose of the planning system to contribute to achieving sustainable development. Sustainable development is defined by economic, social and environmental objectives. It is imperative that where the evidence, when fairly and robustly assessed, leads to a clear conclusion regarding the strategic direction of growth, then failure to follow that evidence and alternatively to then promote development with significantly reduced sustainability benefits, would fail to meet the NPPFs sustainable development objectives, and thus create tension with the Basic Conditions. In this case that tension is considered sufficiently great, that the Conditions could not be said to be met.	The NDP contains numerous policies in support of sustainable development and more than meets the requirements in this regard.	None
46 Pegasus Group	General comments	<p>3. The Pre-Submission Consultation Draft</p> <p>3.1- Within this section of the representations, commentary is passed on the approach taken by the Neighbourhood Plan, in relation to those matters of the evidence based raised above. It is demonstrated that the NP strategy opts for an allocation which would not achieve several of the NP's stated objectives and would not therefore secure the outcome of sustainable development, required by the Basic Conditions. It is acknowledged, that this is a 'high bar' in terms of a threshold</p>	<p>We disagree. The allocations each address the NDPs objectives.</p> <p>Whilst a developer might claim that their sites are best, their</p>	

		<p>test for Neighbourhood Planning, however, in this case the combined effects of a partial evidence based, and the missed opportunities to deliver on the NP's sustainable development objectives, are such that the threshold is reached.</p> <p>3.2- The remainder of this section takes a sequential approach to reviewing the NP and is based upon the NP's section headings.</p>	<p>comments should be seen against the objective independent professional assessments undertaken.</p>	
46 Pegasus Group	Community Vision, Key Issues and Objectives	<p>3.3- As noted in the preceding section there are some key Objectives which the NP is seeking to secure to deliver its Vision for the Village. Key amongst these are:</p> <p>1) Community Cohesion; nurturing health and well-being regardless of age,</p> <p>3) Sustainable New Housing; to provide a balanced range of housing to meet the village's evolving demographic profile,</p> <p>5) Enhance Services and Facilities; to enhance services and facilities,</p> <p>6) Walking, Cycling and Public Transport; with a requirement that new development encourage better connectivity and less reliance on the motor vehicle,</p> <p>8) Protect the Environment; in particular the need to mitigate the effects of climate change, and</p> <p>9) Promote Employment; promote increased employment opportunities.</p> <p>3.4- The NP then summarises some of the Key Issues facing the village. It draws out that there will be an 87% increase in residents aged over 65 by 2036. It notes that retail provision whilst viewed as 'generally adequate' was identified as needing improvement by 37% of respondents to the Community Questionnaire.</p> <p>3.5- Safety on the A47 was defined as an issue, and similarly the reliance on private cars to access work, shopping and health care, was also highlighted, with 93%, 88% and 96% of respondents respectively, stating they used a car to access these services.</p> <p>3.6- Employment opportunities within the village are described as 'very limited', with a reference to home working as means of addressing this.</p>	<p>Noted. The NDP addresses these objectives in a comprehensive manner in a range of policies including, but not restricted to, the site allocations.</p> <p>There are many ways to address issues relating to an ageing population (including support for the provision of bungalows and accessible housing) rather than the provision of a care home, which an independent assessment concluded was inappropriately located in the Neighbourhood Area.</p>	None

		<p>3.7- From only a cursory review of the NP's stated objectives, therefore, a strategy which seeks to address the housing needs of its aging population within the village, and which provides additional retail, health care and employment opportunities within the village, thus reducing the high levels of travel by car outside of the village, would seem to be the basic requirements of an NP strategy to deliver sustainable growth.</p>		
46 Pegasus Group	Policy L1 Settlement Boundary	<p>3.8- The Settlement Boundary has been re-drawn from the that in the existing Neighbourhood Plan, to exclude the PSL Land which forms the southern part of Site F.</p> <p>3.9- No explanation is provided for this approach beyond a bald statement at NP 69, that '<i>potential development sites which ... are included in a NDP for future additional requirements and designated a Reserve Site</i>' are '<i>not included</i>' in the Settlement Boundary.</p> <p>3.10- The current 2018 NP states the following;</p> <p><i>There is a preference for this additional housing to be provided within the existing built up area (delineated in the Harborough Core Strategy as the 'Limits to Development') but, in line with best practice, the Plan accommodates the potential for assessed housing demand to increase in the emerging Local Plan or subsequent documents. The community has indicated a strong preference for any additional housing requirement to be accommodated to the north of the A47 (Q19) and therefore the boundary of the reviewed and extended Limits to Development (shown in Figure 4-3) encompasses, at that location, land for future expansion.</i> (emphasis added)</p> <p>3.11- There is no explanation within the emerging NP as to why the 'best practice' for identifying the reserve Site F land as within the settlement boundary in 2018, is no longer considered 'best practice'.</p>	<p>The Settlement Boundary has been adjusted to embrace allocated sites. The reserve site is outside the SB in line with planning advice.</p> <p>A reserve site has been identified to come forward should housing need increase over the Plan period.</p> <p>Locating this site outside of the settlement boundary will help to ensure that the site does not come forward prematurely.</p> <p>Planning advice has suggested that reserve sites within a settlement boundary can come forward in advance of need being demonstrated.</p>	<p>None</p> <p>None</p> <p>None</p>

		<p>3.12- There is no need to re-draw the settlement boundary here, and indeed it is contrary to best practice. Notwithstanding the site's identification at Policy L3C as a Reserve Site, with the proposed amendment to the settlement boundary, then any future application would still be required to be assessed as if it were in 'open countryside'. That would be counter-productive.</p> <p>3.13- Para 66 of the NP says that both national policy and 'subsequent revisions' of the Harborough Local Plan <i>'provide for appropriate forms of development at the edge of settlements and within the countryside beyond'</i>. However, that is both a) a misrepresentation of national policy with regard to how development beyond settlement boundaries and in open countryside is assessed, and b) an impossible statement to make in the context that the NP cannot know what future revisions of the Harborough LP content will say.</p> <p>3.14- Sites for future reserve housing land should be included within the settlement boundary, as the 2018 NP sought fit to provide for, and which was promoted as best practice.</p>	<p>See above.</p> <p>Agreed. The reference to subsequent revisions of the Local plan will be removed.</p> <p>We disagree for the reasons stated above.</p>	<p>Change to be made as indicated.</p> <p>None</p>
46 Pegasus Group	Policy L2 Area of Separation	3.15- It is noted that part of the allocated site L3A falls within the Area of Separation.	This is correct, but the area referred to is allocated as green space outside the Settlement Boundary Figure 6-3.	Change to be made as indicated.
46 Pegasus Group	Policy L3A	3.16- Reference is made to development only occurring to the East of a High Pressure Gas Main, the location of this main should be identified on the site allocation plan, to provide certainty. A Plan is attached at <u>Appendix 6</u> for clarity.	Agreed.	Change to be made as indicated.
46 Pegasus Group	Policy L3C	3.17- It is unclear why the Policy L3C site is maintained as a reserve and not allocated within this Plan. It was the only reserve site of the previous NP, and therefore was identified specifically to meet housing need when that requirement was identified.	Other sites that have come forward are preferred as allocations in the updated NDP	None
		3.18- As identified through the previous Section of these representations, and not repeated here, the assessment of the relative merits of the alternative sites now the subject of allocation in the NP was not undertaken on an equitable basis.	The site assessment process was fair, objective and independent.	None

		3.19- As noted in the Highways Technical Note (Appendix 5) the access now proposed for the L3C land has been agreed by Leicestershire County Council as being safe and appropriate. It also notes the wider sustainability and safety benefits that the access delivers.	Noted, however this does not affect the overall suitability of the site compared to alternatives.	None
		3.20- It is also unclear, why the L3C site is identified as only being capable of achieving NP Objectives, 3 (Sustainable New Housing) and 4 (Location of New Developments) when both the proposed allocations are additionally stated to achieve Objectives 1 (Community Cohesion) and 8 (Protect the Environment). There is no evidential basis offered to explain this discrepancy, and indeed it further reflects the 'partial' and far from 'objective' assessment which underlies the evidence base.	Noted. The HNA concluded that a care home would be inappropriate for the Neighbourhood Area therefore it would not contribute to Community Cohesion.	None
		3.21- It is also important to reflect, that no part of the exercise has sought to assess the wider offer from PSL, to deliver a development which can also offer retail, care home, bungalows, custom and self-build, and a GP Surgery for the benefit of the Village. The NP references concerns related to the current applications but does not seek to balance that with any balanced assessment of the benefits.	Community benefits suggested by PSL in their wider offer include: Retail: while the Coop would use a larger site if available, they are content with their current site. GP surgery: the local GP surgery has provided a written statement that it has no wish for premises on that site. Care Home: The AECOM report recommends that a care home should be provided closer to a larger catchment area. A new Care Home is currently being built less than 2 miles away	None

			<p>towards Leicester beside the A47.</p> <p>The community provided 245 objections to the planning application for 230 houses which included retail, a Care Home, and GP surgery</p>	
		<p>3.22- The Village is aware, for example, that the current Village Co-Op store is on a highly compromised site. The current NP describes it in the following terms;</p> <p><i>This sells a wide range of products and has an off-licence for wines, beers and spirits. It is a small retail establishment so cannot carry a large stock. It also finds receiving deliveries problematic because of the parking difficulties, largely caused by the customers of the shop itself. Nevertheless, it is highly valued by villagers used extensively by residents. In the village wide consultation 97% of respondent households reported using the store.</i></p> <p>3.23- The Co-op have been actively looking for alternative premises in HotH for in excess of 10 years, without an alternative being identified. Their ability to remain in the Village at all, must very much be in doubt. The Co-Op have pro-actively taken the decision to support the current PSL's application. In correspondence dated 23/11/23 to the case Officer (Appendix 7), the Co-op's acquisitions manager stated;</p> <p><i>Following our ongoing discussions and meetings with the agent responsible for the new development at Houghton East, I am pleased to confirm our interest and support for the application.</i></p> <p><i>The Central Co-op store which currently trades within Houghton on the Hill is one of the smallest stores in the estate with minimal on-street car parking and servicing.</i></p> <p><i>In relocating the business to a new purpose-built convenience store fronting the Houghton East new development, we could provide a much-improved product</i></p>	<p>Direct contact with the Coop has resulted in their statement that though they would like a larger site, they have no plans to close the current store which is financially viable.</p> <p>Noted</p>	None

		<p><u>range and new services to the community. The new store would also benefit from dedicated customer parking and servicing, making it easier for customers to access the store and ease congestion on Main Street. (emphasis added)</u></p> <p>3.24- There is nowhere, in any of the NP evidence base, that assesses the balanced benefit of securing new (indeed retained) retail facilities for the Village. The Co-op identify improved product range, dedicated parking and dedicated servicing (where currently there is congestion and compromise). It would of course both retain, and likely enhance employment opportunity for the Village too.</p> <p>3.25- The strategy adopted by the NP is completely silent on this matter. Yet delivery of an enhanced retail offer goes to the heart of the Local Plan's Objectives of enhancing services and facilities, reducing the need to travel outside of the village, and providing enhanced employment potential and assisting delivery of a vital community facility to the benefit of social cohesion.</p> <p>3.26- Similar arguments can be made with respect to the GP surgery offer, the Care Home provision, and the bungalow offer.</p>	<p>Noted</p> <p>Noted</p> <p>Noted</p>	
		<p>3.27- It is a startling admission of the NP evidence base, that it does not seek to support the requirements for a Care Home offer for its older population. This is despite the objective to achieve community cohesion regardless of age. The purpose of the Rural Centres, as Local Plan policy SS1 confirms is act '<i>as a focus for rural development, to serve both the settlements themselves and the surrounding rural area...</i>'. There is no suggestion that the NP has had regard to this wider remit in addressing the desirability of locating Care Home provision within the Village. A care home would not only meet the social cohesion objective for its aging population, allowing residents to stay within the heart of their community, but would also offer local employment opportunities too.</p>	<p>The HNA concluded that a care home would be inappropriately located in the Neighbourhood Area.</p>	<p>None</p>
		<p>3.28- With regard to the offer of a GP surgery, the Leicestershire Integrated Care Board, took the step of amending their application response following discussions with the applicant, to specifically change their advice to one of securing an onsite facility with the application, or a contribution if that were not possible. Further progress in this regard will only be possible once the principle of delivery is established through the grant of an outline planning consent, but PSL very much view the delivery of a combined Health Care package for the site of Care Home and Surgery as desirable, with 88% of respondents to the Questionnaire stating they</p>	<p>We agree that LICB have advised that they would support "an onsite facility with the application, or a contribution if that were not possible".</p>	<p>None</p>

		currently relied on private car trips to access Health Care which would by necessity, be outside of the village.	However, the local GP surgery has provided a written statement that it has no wish for premises on that site.	
		<p>3.29- It is not clear that the NP has provided or addressed the genuinely sustainable development options being offered by the potential for a combined Site F&H proposal to deliver genuine benefit to the Village. Whilst the NP refers to ‘significant concerns’ of the live application from residents regarding transport impacts – these have been addressed with Leicestershire County Highways and either have, or are about to be subject to resolution.</p> <p>3.30- County Highways have agreed the layout of the new junction arrangements. There are benefits with development of Site F in that it would create new Highway Infrastructure which would have the effect of slowing traffic down upon entry to the Village on the A47, and in turn improving its safety. Similarly, the development of Site H and provision of a diverted connection between Gaulby Lane and the A47 will provide a betterment to the existing situation, through the closure of what is currently considered a dangerous junction. The principle of this alternative route is confirmed through the approval of consent for the new golf course and the replication of this provision within the planning application means the road can be delivered independently of the golf course.</p>	<p>Noted.</p> <p>On the basis of all the available information, other sites remain preferable as allocations in the NDP.</p>	None
		3.31- The safety of this corridor is one of the <i>Community Key Issues</i> identified at para 60 of the NP. The response to this issue from the NP is to ‘hope’ that LCC will address the concern. The Plan makes no proposals with regard to it and does not even set an NP Objective in relation to it, despite identifying it as a ‘Key Issue’. The proposals for Highways Infrastructure associated with the Site F access proposals will, by slowing vehicles down as they enter the Village from the East and in turn providing a benefit to road safety. Sites F and H are the only allocation Options which offer this potential, yet no reference is made to this in the NP’s assessments, nor any weight given to the associated benefits, as a factor in achieving sustainable development, notably the Social and Environmental elements of sustainability (NPPF para 8).	<p>Highways responsibilities rest with LCC.</p> <p>The results of a 2024 Community Speedwatch survey show that most drivers do obey the 40mph speed limit.</p>	None
		3.32- What the NP evidence is missing, in order to achieve the goal of sustainable development, is any equitable measure, or assessment of the merits of, the PSL wider offer to deliver against the NP’s stated objectives. Rather, the Plan simply	The NDP contains a range of policies which address issues relating	None

		focuses on delivering additional housing developments with no reference to their lack of any wider benefit at all.	to sustainability, over and above the site allocation policies.	
46 Pegasus Group	Policy L4	3.33- It is not clear the basis on which the NP is envisaging that this policy could be implemented in practice. It offers no mechanism for control. Moreover, NP para 89 identifies that construction requires a 'break' in construction periods to provide respite to residents. Yet the effect of the policy, with the aim of providing a steady rate of development throughout the plan period, would have entirely the opposite effect to that which the Plan seeks.	Agreed.	Phasing policy removed.
46 Pegasus Group	Policy L5	<p>3.34- The policy is seeking to control matters which have already been addressed with the previous Outline Permission. Any Club House would be some distance from the Village, and it is unclear the planning basis on which the NP would propose an hours of operation restriction, or seek to limit capacity of any building. This could materially impact the viability of such a development, and yet is requested without any evidential justification, or viability testing.</p> <p>3.35- No such restrictions were deemed necessary at the time outline permission were granted, and none would be justified or enforceable now, given that consent has been granted. Planning Practice Guidance establishes in a section considering the evidence needed for viability assessment, that policies in a plan should not undermine the deliverability of the plan. In this case, where the NP seeks to directly impact the operational and management aspects of the relocated Scraftoft Golf Club, itself a requirement of Harborough Local Plan Policy SC1, it is necessary for the NP to demonstrate that Policy L5 would not impact the viable delivery and operation of the Club. In the absence of that evidence, and in the light that neither an hours of operation restriction, nor capacity limitation were deemed necessary to be imposed when granting outline planning permission, the policy is considered not to meet national guidance on Viability (PPG Para: 048 Ref ID: 61-048-20190315) nor NPPF guidance on the use of restrictive conditions or noise (NPPF paras 57 and 187).</p> <p>3.36- For clarification, the Link road between Gaulby Lane and the A47, is not solely dependent on the Golf Course, and is capable of implementation through either the application proposals or the Golf Club coming forward.</p>	<p>Noted. Under the emerging HDC Local Plan the Scraftoft SDA project is not taken forward. In this case the current conditional planning consent for a Golf Course falls.</p> <p>We agree that Policy L5 needs revision to cover development in the countryside in a general way.</p>	Policy on the Golf Course has been removed.
46	Policy H1: Housing Mix	3.37- The policy is in conflict with the Policy L3 Allocations and Reserve Site policies. Those policies expressly allow for 4-bedroom properties and exclude 1	There is no conflict.	None

Pegasus Group		<p>bedroom properties. Policy H1 however, provides a presumption in favour of all properties having 3 bedrooms or fewer (i.e. including 1-bedroom properties). It also encourages provision for those seeking to acquire their first home. Some 1 bed properties may help meet this need, but the L3 sites are expressly advised these will not be accepted. Given that the Policy has a provision for sites over 50 homes, which can only be a reference to sites under Policy L3A and Policy L3C, it is unclear how the conflict between these 2 sets of NP policies is intended to be managed.</p> <p>3.38- Moreover, the Housing Mix Policy marks a material shift from the Harborough Local Plan in terms of M4(2) Category 2 housing. The LP policy requires 4% provision on sites over 100 homes, the NP Policy is for 10% on sites over 50 homes.</p> <p>3.39- In its totality, the important matter is that the development of sites brings forward mixed and balanced communities, and that they provide flexibility within the plan period to respond to market signals and local housing need, at the point development is brought forward.</p>	<p>The policy clearly says 'where practicable and viable'.</p> <p>The evidence is provided in the HNA which confirms a rapid growth of the older population. HDC has not objected to this policy.</p>	None
46 Pegasus Group	Policy 2: Affordable Housing	3.40- Policy H2, especially its trigger (more than 10 homes) and provisions under b) and d) do little more than repeat the existing Development Plan policies and is not required to be contained within the NP Policy itself. The remaining provisions of tenure blind, and local connection requirements, are standard provisions of S106 agreements, and it is unclear if the Policy is necessary within the NP.	The policy provides a comprehensive response to affordable housing applications.	None
46 Pegasus Group	Policy D2 : Housing Design and Policy D4: Energy Efficiency and Climate Change	3.42- Neither of these policies are necessary within the NP. They do not add anything to the Future Homes Standard which comes fully into force in 2025, moreover they do not add to the NPPF or Local Plan policies. Policy D2 repeats the objectives of the NPPF (Section 12 Achieving well designed and beautiful places) and Harborough Local Plan Policy GD8. Policy D4 will be superceded by the Future Homes Standard.	They add considerable local detail to general design standards.	None
46 Pegasus Group	Policy EMP1: Employment and Commercial Development	3.43- The benefits of the PSL's proposals for the NP in terms of delivering genuinely sustainable development, with opportunities for local employment through the mix of Retail, GP and Care Home facilities are well rehearsed above. 74% of respondents to the Community Questionnaire wanted to see new retail and service outlets in new developments. The PSL's proposal is the <u>only</u> option offering to meet this need as part of their proposed development. There is a notable absence of recognition of this in the NP's site assessments.	The policy supports appropriate employment opportunities and we have received planning advice that it meets the Basic Conditions.	None

		3.44- For the reasons noted, this is considered to be a substantial omission of the NP's evidence base and analysis and creates a situation where the Basic Conditions relating to compliance with national policy and guidance, and the achievement of sustainable development, are not met.		
46 Pegasus Group	Policy S1: Retention of Key Facilities, and Policy S2: Retail	<p>3.45- The issue of the current precarious viability of the existing Co-op within the Village is referenced in detail under the commentary on Policy L3C above.</p> <p>3.46- Whilst Policy S1 seeks to establish a policy framework which would prevent development proceeding that would lead to the loss of a community facility, it is silent on any positive actions that could be undertaken to retain those facilities, such as the Co-op which are acknowledged as being on a compromised site, with problematic parking and services, and which due to is very limited size (as confirmed by the Co-op themselves (see letter at Appendix 8) is unable to provide the full range goods and services desired.</p> <p>3.47- NP para 138 acknowledges that having local facilities contributes to enhancing community cohesion, but as noted above, the NP does not attribute any value to the ability of the PSL site to contribute to this aspect of community cohesion. Only the PSL proposals offer this potential, and this is endorsed by the Co-ops vocal support of their planning application, to deliver a new retail store.</p> <p>3.48- The NP, more through omission than commission, is doing nothing to prevent the potential loss of the Village supermarket, one of its key community assets, and one which Policy S1, the NPs Objectives, and Evidence Base all identify the retention of, as important. Only PSL offer a potential resolution for this. They do so with the support of the supermarket operator. The NPs omission in addressing this hard reality head on, does nothing to achieve the NPs aims of securing a viable and sustainable future for this key facility of the Village.</p>	<p>The policy is entirely appropriate in protecting existing community facilities.</p> <p>Whilst the Coop might have indicated they could use a larger site if available, they have advised us that they are content with their current site. This site has the advantage of being central to the village and more accessible for pedestrians than a site north of the A47 and east of the village. It is acknowledged that parking is an issue at the current site.</p>	None
46 Pegasus Group	Policy S3; Infrastructure	3.49- The installation of communal electric vehicle charging points for visitors to the village and those residents who cannot access a domestic charger, is identified as a 'priority'. PSL Application has made provision for communal chargers, associated with the new retail facilities. It is another example, of the wider community and	We consider that chargers at the proposed retail outlet will be more useful to	None

		sustainable benefits which the NP has not factored into, in its consideration of the PSL proposals.	passing shoppers than residents. Plans are under discussion with HDC to provide public charging close to the areas of the village where in-curtilage charging is not possible.	
46 Pegasus Group	Policy EV: Biodiversity	3.50- Provision b) of the Policy replicates the requirement of the Environment Act 2021 as a matter of Law, as is not required to be in policy.	Acknowledged. Our objective is to provide local guidance to developers.	This policy has been reviewed to stress the local context.
46 Pegasus Group	Policy EV2: Trees Hedges and Wildflowers	3.51- The requirement of Policy EV2 that a post construction map be provided to the Parish Council, presumably to be secured by condition, would be ultra vires. If the District Council require a post completion survey of Landscaping, that can be secured by condition, then the District could require this and hold that information on their public file, where any resident or Parish Council could review it. However, in the event that a development was not carried out in accordance with approved plans, then powers already exist for the District Council to secure information in relation to any potential breach of planning permission and they have powers to enforce against any breach. 3.52- The provision to protect and enhance landscape and habitats is already embedded in Local Plan Policy GD8, and the final paragraph of Policy EV2 does nothing more than repeat requirements already necessary to address Policy GD8, or repeat a desire for monitoring, which is a power already held by the District Council. This final paragraph of the policy should be removed.	It is acknowledged that powers exist with the District Council. However, experience has demonstrated that post-development reviews of this kind have a low priority. We wish to facilitate local monitoring.	This policy has been reviewed to stress the local context.
46 Pegasus Group	Policy EV4: Footpaths, Bridleways, Cycleways and Access to the Countryside	3.53- The policy references the need to enhance existing routes and provide safe, convenient and attractive routes to shops, employment, schools, and community facilities for health and leisure. 3.54- The PSL proposals for the treatment of the A47, the addition of signalised pedestrian crossing, and creation of safely accessible retail and community facilities, all go toward meeting the objectives of this policy, in a way which the NP's	Noted. The allocated sites provide similar benefits.	None

		proposed allocations, cannot and do not. This goes to demonstrate the chosen NP strategy to achieving the sustainable development growth of the Village, which it is evidenced in these submissions, is sub optimal to the point of failing to meet the Basic Condition related to the achievement of sustainable development.		
46 Pegasus Group	General Comments	<p>4. Summary and Conclusions</p> <p>4.1- In summary, the NP is premature preceding ahead of the Regulation 19 Harborough Local Plan, which will be published early in 2025.</p> <p>4.2- The Neighbourhood Plan sets its own target of needing to base its policy upon a fair, robust and defensible methodology which treats potential sites ‘in the same way’ such that an objective assessment can be made.</p> <p>4.3- The representations have evidenced that the assessment undertaken has been far from impartial and objective, such that the very many sustainability benefits and Plan objectives, that can only be secured through delivery of the Parker Strategic Land sites, have been ignored, overlooked, and factually misrepresented.</p> <p>4.4- The Neighbourhood Plan states at para 10, that the ‘<i>community does not rate well in terms of sustainability</i>’, and yet the benefits of the Parker Strategic Land proposals in delivering:</p> <ul style="list-style-type: none"> • a care home to meet the needs of an aging residents with care related needs, (which residents the Plan suggests, would be better decanted into Leicester City) • up to 35 bungalows to meet identified local needs of an aging population, with the potential benefit of releasing family housing, • a GP surgery to deliver community health benefits for all, • custom and self-build housing to meet the aspirations of those who wish to build their own homes, • a new supermarket with a much-improved layout, stock levels, servicing and parking arrangements, which is publicly supported by the Co-op, and which will secure a long term presence of a supermarket in the village, 	This summary is a repetition of points raised above which have been individually addressed.	None

		<ul style="list-style-type: none"> • publicly accessible EV charging points, • improvements to safety on the A47 with a scheme to reduce traffic speeds, endorsed by County Highways, • pedestrian/cycle accessibility enhancements and ready connectivity to the Village centre, and • local employment opportunities <p>are simply not reflected or acknowledged <u>at all</u>, in any assessment of the Parker Strategic Land proposals, which have long been promoted to the Neighbourhood Plan Group.</p>		
		<p><u>Conclusion</u></p> <p>4.5- The consequence of not having undertaken a fair and robust assessment of the options and benefits available, is that the Plan is being subject to a consultation which has not fully informed the village of the genuine alternative sustainable options before it, and how these would fulfil a number of the Plan's own objectives which otherwise it will, on its own terms, not address. The consultation process is therefore flawed.</p> <p>4.6- Because of this, the ability of the Plan to demonstrate that it is contributing to the aims of 'sustainable development' as required by national policy and indeed the Basic Conditions, is simply not evidenced. As prepared and drafted, it is considered</p>	<p>The premiss on which this conclusion is drawn is rejected.</p> <p>PSL conducted their own consultation with the village consisting of a leaflet drop and a public display and engagement at Houghton Village Hall. This was attended by over 100 residents. Subsequently the PSL planning application for 230 houses received over 200 objections.</p> <p>The details of the extensive consultation under Reg. 14 are fully documented on the</p>	<p>Proposed actions in relation to earlier detailed comments are listed above.</p>

		<p>that the Plan does not demonstrate that it meets the Basic Conditions a) and d), and it should not therefore progress to referendum.</p>	<p>NDP pages of the PC website.</p> <p>The publication of the PSL comments and the responses provided, enable the community to see all representations and to make up their own minds.</p> <p>The conclusion that the NDP as drafted fails to meet the Basic Conditions is rejected.</p> <p>In producing the NDP, the Working Party was supported by independent experts including Yourlocale, RCC, HDC and AECOM.</p> <p>It is understandable that a developer who fails to secure an allocation through the NDP will argue that their site is best and should replace those allocated.</p>	
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