

Response

From:

Sent: 09 March 2023 14:40

To:

Subject: RE: Draft List of Policies following meeting 2nd March

Yes, you are correct.

My colleague (who collated the data and wrote the paper) apologises for the ambiguity and slight confusion. I think we may amend the document to be a little clearer for communities.

also says that it is of course only an indicative number and replied to me;

You can blame it on me for not making it clear that the indicative target is in addition to any Policy H1 residual shortfall (13 in Houghton's case as at 31.3.22). This is reported and updated in the annual 5 Year Housing Land Supply Position Statement.

Please stress it is just indicative. I have amended the methodology to make it clear that the H1 residual shortfall should be included.

Hope this helps clarify

From:

Sent: 07 March 2023 17:37

To:

Subject: Re: Draft List of Policies following meeting 2nd March

Thanks

Ref housing numbers, HDC reported in October an outstanding number for Houghton of 13. I have their document.

We now read:

The above methodology gives an indicative residual housing target for Houghton on the Hill of around 55 dwellings (rounded) to 2036. This is in addition to commitments (as at 31/3/2022) of 36 dwellings

Which developments /applications were included in the 36 commitments at 31/3/22?

So do we plan for 55 +13, 55+36, or an extra 55.

Am I the only one confused?? i.e. is it perfectly clear to everyone else?

Regards

Note for Houghton on the Hill Neighbourhood Plan Group: Indicative housing target to 2036

Date prepared: March 2023

Introduction:

This note sets out the approach Council officers have used in establishing indicative housing targets for settlements to 2036 to facilitate rolling forward neighbourhood plans beyond 2031. The current Harborough Local Plan (adopted April 2019) covers the period to 2031. While preparation of a new Local Plan has started, this work is at an early stage as set out in the Local Development Scheme¹.

The plan period for the new Local Plan has not yet been determined but is likely to run to at least 2041 to meet the National Planning Policy Framework's (NPPF) requirement that strategic policies should look ahead over a minimum 15-year period from adoption.

While work on the new Local Plan progresses, this paper summarises how an overall District residual housing requirement figure to 2036 has been established and the basis for distributing the requirement figure to give an indicative settlement level minimum housing target to 2036. The purpose is to provide Neighbourhood Development Plan (NDP) groups with a figure to enable further NDP preparation work to progress ahead of Local Plan preparation. The figures are a 'best estimate at this point in time' but will need amendment subject to the new Local Plan strategy.

It should be noted that the housing target set out in this paper is indicative only at this stage and does not pre-empt or prejudice work on the new Local Plan. In the absence of the new Local Plan's strategy for the distribution of housing after 2031 certain assumptions have been made to derive a settlement target figure to 2036. These assumptions may not be reflected in the new Local Plan.

Paragraph 67 of the NPPF states: *Where it is not possible to provide a requirement figure for a neighbourhood area, the local planning authority should provide an indicative figure, if requested to do so by the neighbourhood planning body. This figure should take into account factors such as the latest evidence of local housing need, the population of the neighbourhood area and the most recently available planning strategy of the local planning authority.*

In supplying an indicative target, it is important to emphasise that the adopted Local Plan's strategic policies are not out of date. However, given that the Local Plan covers the period up to 2031, it is understandable that Neighbourhood Plan groups may want to look beyond 2031 and gauge the potential level of housing required beyond 2031 for plan making purposes.

In arriving at an indicative housing target to 2036, the factors set out in the NPPF para. 67 have been addressed as follows:

- *Latest evidence of housing need:* This is set out in the Leicester and Leicestershire Housing and Economic Needs Assessment (July 2022) and the accompanying

¹ [Our policies, plans and strategies - Local Development Scheme \(July 2022\) | Harborough District Council](#)

Housing Distribution Paper (June 2022)². These formed the basis for the Statement of Common Ground (see more in next section).

- *Population of the neighbourhood area:* In the absence of up-to-date settlement level Census 2021 data, an estimate of the current number of households within the NDP area has been used based on previous Census data and housing completion records.
- *The most recently available planning strategy of the local planning authority:* The strategy as set out in the adopted Local Plan has been carried forward in so far as the new requirement to 2036 has been apportioned across the settlement hierarchy levels as in the Local Plan. Work on the new Local Plan has not yet identified an appropriate development strategy.

The next section sets out the steps and assumptions made in arriving at indicative settlement housing targets.

Establishing appropriate timeframe for settlement level targets to 2036

While the new Local Plan is likely to cover the period to at least 2041, at this stage Council officers consider it prudent to look at need to 2036, allowing neighbourhood plan groups to roll forward their neighbourhood plans by 5 years. The period to 2036 equates to the timeframe covered by the Statement of Common Ground ³ (SoCG) prepared by the Leicester and Leicestershire local authorities to apportion Leicester City's unmet housing need. While Harborough District Council has yet to approve the SoCG, it represents currently the most informed and evidence-based housing need figures for the local authorities and has been the result of substantial joint working as part of the Duty to Cooperate, including the preparation of the Housing and Economic Needs Assessment and the Housing Distribution Paper.

Working assumption for District additional requirement up to 2036

The SoCG sets out a requirement figure of 657 dwellings per annum (dpa) for Harborough District Council to 2036. An additional 20% allowance has been added to the 657dpa to allow for contingencies and market choice. Taking into account commitments/allocations as of 31 March 2022, this results in a residual requirement of 3,600 dwellings to 2036 for the District as a whole.

Strategy for distributing the 3,600 dwelling indicative requirement across settlements

Given that work on the strategy for the new Local Plan is at a very early stage, rolling forward the adopted Local Plan distribution strategy is considered to be the most appropriate approach at this stage. The approach will be reviewed once further progress is made on the new Local Plan, especially as a preferred option is determined. However, in the meantime, this is considered the most appropriate basis for the purposes of identifying an indicative figure for NDP groups in order to support work on NDP preparation in advance of the Local Plan identifying a specific figure for each sustainable settlement.

Table 1 below sets out how total housing delivery in the adopted Local Plan is split between the settlement hierarchy tiers. Column B breaks down the 3,600-dwelling requirement based

² [Housing and Economic Development Needs Assessment \(HEDNA\) -Strategic Growth Plan LCC \(lstrategicgrowthplan.org.uk\)](https://lstrategicgrowthplan.org.uk)

³ [SoCG](#) as considered by the Council's Scrutiny Panel (Communities) on 13 October 2022

on the same percentages. This gives the number of additional dwellings that need to go to each level in the settlement hierarchy for the period to 2036 under a roll-forward of the current Local Plan strategy. This shows that Rural Centres (including Houghton on the Hill) will need to accommodate an additional 706 dwellings to 2036.

Table 1: Settlement hierarchy tier share of 3,600 dwelling requirement based on current Local Plan strategy.

Settlement hierarchy tier	A. Current LP Share of planned development 2011-2031 (%)	B. Share of 3600 dwellings for Settlement Hierarchy Tier based on A percentage
Leicester PUA (S/T/B)	16.6	598
Sub Regional Centre (MH)	31.1	1120
Key Centres (L/BA)	20.2	731
Rural Centres	19.6	706
Selected Rural Villages	8.6	310
Countryside	2.0	72
Windfalls	1.7	61
TOTAL	100	3,600

Establishing indicative settlement housing targets to 2036

In the absence of settlement-level Census 2021 data, the number of households within settlements has been used as a proxy. This was estimated by taking Census 2011 households and adding housing completions over the period 2011-22.

Within the relevant settlement hierarchy tier, the proportion of households within each constituent settlement has been established. This percentage has then been applied to the overall requirement for the settlement hierarchy tier (i.e. 706 dwellings for Rural Centres) to give a settlement indicative residual target.

Houghton on the Hill:

Estimated households at 2022 = 731 households

731 households as a percentage of total households in Rural Centres = 7.63%

Houghton on the Hill's share of Rural Centres indicative requirement (706) = 54 dwellings

Summary

The above methodology gives an indicative residual housing target for Houghton on the Hill of around 55 dwellings (rounded) to 2036. This is in addition to commitments (as at 31/3/2022) of 36 dwellings

As stated earlier, this target takes into account current evidence and assumes a continuation of the current Local Plan strategy. While this is unlikely to be the case, for neighbourhood plan making purposes the indicative target represents a reasonable starting point.

It is important to note that the indicative settlement target set out in this paper represents a point in time assessment. As work on the new Local Plan progresses and additional evidence is prepared the assumptions feeding into the targets may need amendment. It is therefore recommended that the Neighbourhood Plan group keeps in contact with Council officers for any updates as preparation of the Neighbourhood Plan progresses.

From:

Sent: 03 April 2024 14:35

To:

Cc:

Subject: RE: Houghton NDP progress and questions

Thanks for the email and request for advice.

I will share the documents with colleagues and come back to you with further constructive comments in due course.

My initial comments without prejudice are:

The HNA is part of your evidence base and demonstrates (presumably) that there are disproportionately more 4 bed houses than are either required or wanted in Houghton on the Hill. To try and address that balance the HNA suggests that new developments are limited to 3 bed dwellings or less.

is correct, I think, about financial viability for developers, and the examiner may consider it too restrictive to limit new developments to maximum of three bed houses. Also consider the social implications of this element of the policy as it is potentially entirely excluding larger families from all new development.

Policy H5 of the Local Plan states: *'Major housing development should provide a mix of house types that is informed by up to date evidence of housing need.'* I anticipate the HNA is informing the housing mix policy for Houghton and could therefore be considered in compliance with the requirements of the Local Plan. With this evidence you should be able to set an acceptable housing mix to address the balance. The housing mix may not ultimately be zero dwellings with 4 beds or more, but you could state a % to restrict the number of 4 or more bed houses? If I am understanding correctly you don't want to see new developments with a high proportion of 4 bed or more dwellings, and your evidence supports this approach.

On an initial reading of the proposed housing allocation policies, I think the biggest problem is the restriction on increase in number of bedrooms or addition of another floor.

e) Each dwelling will carry a covenant that alterations may not be made which will increase the number of bedrooms or add an additional floor to the building

A loft conversion, for example, is considered to be permitted development, not requiring an application for planning permission, provided certain limits and conditions are met. A loft conversion would add another floor to the dwelling and, likely, increase the number of bedrooms. I anticipate that may be a problem, but I will wait to hear from DM colleagues.

I note the allocations for new dwellings and Houghton on the Hill should be congratulated for taking a proactive approach to provision of new homes in the community. As I am sure you are aware the site north of the A47 is already the subject of a development enquiry.

Hope this helps

From:

Sent: 11 April 2024 11:46

To:

Cc:

Subject: RE: Houghton NDP progress and questions

I have received some further comments from Development Management Team about the clauses within the options and conditions document.

Please see DM comments:

Site 1:

b) this will be an issue for viability

c) what do the QB mean by older persons?

d) do not reference bungalows; suggest - looser; lower density; soft landscape development at site frontage

e) This is a PD restriction and should be assessed at the time of the application if necessary to remove

f) Area Of Separation? What do the QB mean by this? Within the site? Or outside? Also, biodiversity and SUDs will be a legal requirement anyway. What do the QB mean by safe community access?

g) This is a S106 matter

h) existing public right of way network (remove reference to Covert Lane); a traffic light controlled crossing is already provided – highways unlikely to require another so close – will disrupt traffic flow adding a second

l) a nice to have; but unlikely.

Site 2:

b-e) as above; too prescriptive

f) very unlikely to happen – safety issues; adoption by HDC would be a unlikely and LCC not likely

h) S106 matter

Site 3

As per above Site 1 and 2

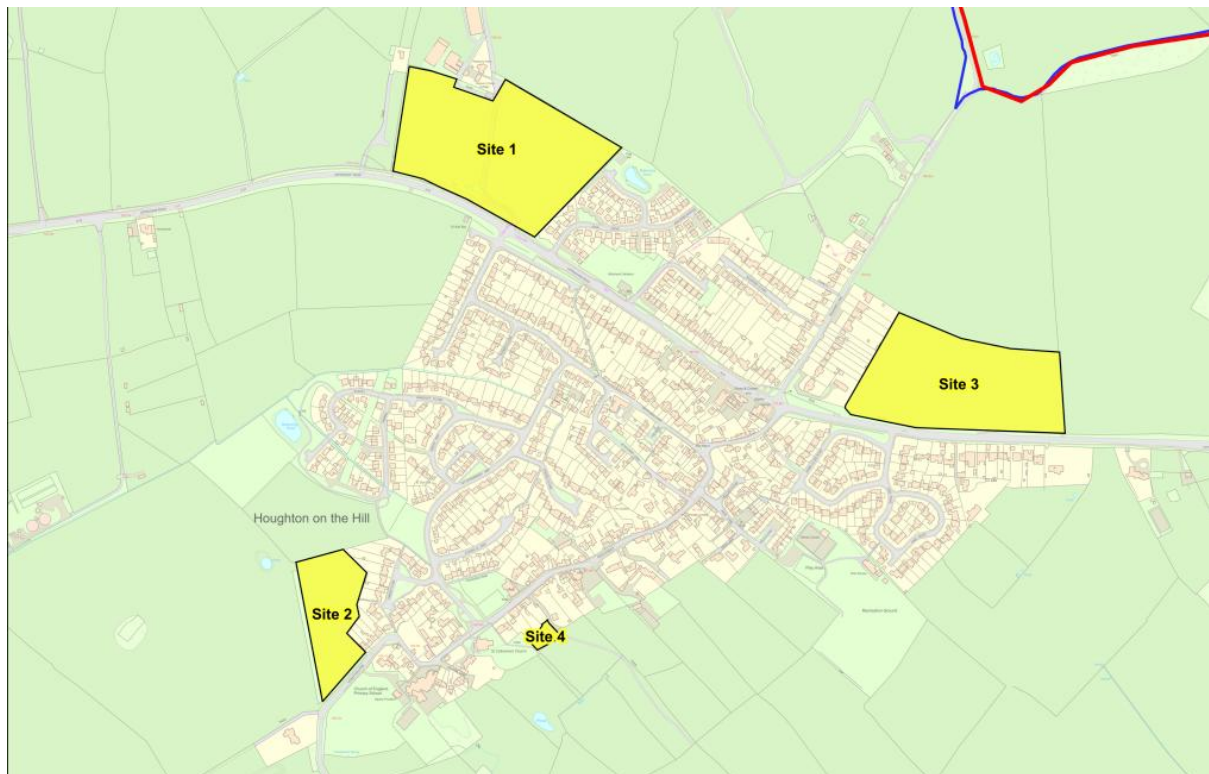
Site 4

c) What do the QB mean by 'Whole life' – and why is this not applied to the other sites?

d) as per previous sites

e) LPA is unlikely to approve private access

Regards



From

Sent: 11 April 2024 12:35

To:

Cc:

Subject: RE: Houghton NDP progress and questions

I believe that the issues raised by DM are mostly concerning adoption of the car park.

The PC could of course adopt a car park and maintain it for the benefit of residents and visitors to the school.

Safety issues can usually be overcome if enough money is spent! Any highways access and egress will need approval by LCC Highways of course, as will any crossing over the highway.

With regards to speaking to developers

1. Beware of promises made which will never come to fruition – developers promise lots of things to get permission but then viability issues get in the way.
2. Never assume anything will happen until it is in a legal agreement.
3. Bear in mind that developers know that Houghton will probably have to take more development in the future
4. Be reasonable at all times, you will probably get more in the long run
5. Remember the QB is not the planning authority

6. Set your 'red lines' and try and stick to them but some flexibility will be required

From:

Sent: 12 June 2024 12:02

To:

Subject: RE: Houghton NDP (again)

Thanks for the message.

I think what you have proposed for the executive summary of changes document is very sensible. Track changed documents get too complicated to make sense of and if there have been such fundamental changes to the 'made' NDP it seems a good idea to start again.

If you submit the VDS to us for comment, I would hope to be able to turn this around in a couple of weeks

We now have a little bit more clarity concerning housing numbers for the Local Plan, although the numbers are still being refined and may be subject to change.

For Houghton on the Hill the new Local Plan growth figure for 2023 to 2041 is approximately **81 dwellings** in the plan period.

I think this is a little higher than previously communicated in the projected figures.

If you want to discuss further, I am sure that officers will be pleased to discuss with Houghton on the Hill over the summer and before the Reg 19 draft is completed.

Hope this helps

From:

Sent: 09 August 2024 11:56

To:

Cc:

Subject: RE: Houghton on the Hill NDP revision

Thanks for the email and yes it is pretty busy here.

Please submit the documents to us via email with a covering letter/email asking HDC to undertake the work (SEA screening?)

Do you have an update on when the Plan might undergo the pre submission consultation?

From:

Sent: 17 September 2024 17:08

To:

Cc:

Subject: RE: SEA for Houghton NDP??

I have not completed an SEA screening for the review plan, but can do so assuming that the draft just seen will be the draft that goes to pre submission consultation (Reg14).

It is unlikely that a full SEA will be required given the scale of proposed development within the Plan, but please wait for confirmation of this prior to making any assumptions.

I should have the SEA screening completed by the end of the week.

We have also received some correspondence from residents in Houghton on the Hill. The Facebook post may be familiar to you and the minutes of the NPWP that state declarations of interest are not required.



Hands Off Houghton

Just now •



BUT the NPWP has indeed made decisions as where housing should go in the draft Neighbourhood Plan and based on those decisions discussions have subsequently been held by Parish Councillors with developers to change their plans, including adding a car-park to the application for just housing in the field off Stretton Lane.

Villagers have not seen that evidence or the draft Plan and we have not yet voted on it but active development plans are being changed on the basis of this "no power of decision" - this governance needs external scrutiny by HDC.

**Minutes of the Meeting
of the Houghton Neighbourhood Plan Working Party (NPWP)
held in the Village Hall Meeting Room, Main Street, Houghton on the Hill
13th March 2024 (19.00 – 21.35)**

01-03/24	Present: Ian Hill (Chair), Juliet Bailey, Marion Keene, Kevin O'Neill, John Siddons, Ann Sleath, Dave Tull, Apologies: Simon Andrews, Huw Francis, Luke O'Neill,
02-03/24	Declaration of Interests. IH explained that after advice from LRALC, PC has determined that since NPWP can only make recommendations and has no power of decision, declaration of interests is not necessary.
03-03/24	Minutes of the Meeting of 6th February 2024 The minutes were agreed to be a true and accurate record of the meeting subject to adding Simon Andrews to the list of apologies. . Action IH

In the interests of transparency, it is always best to be upfront about any potential conflicts of interest – even if they are only perceived.

For example, if a member of the NPWP were to be a Parish Councillor it might well require a declaration of that interest. If the member of the NPWP owned land or a property adjacent to sites being discussed, that should also be declared.

I think that a blanket decision that declarations of interest are not required is unhelpful, even if it may be, by the terms of the working party, correct. I do not know whether it is correct advice from RCC or not

FOI25/575 - Houghton on the Hill Village Plan

Other issues that have been raised I believe are part of the residents comments for 24/00359/FUL which can be found on line

Hope this helps

From:

Sent: 20 September 2024 11:31

To:

Subject: RE: SEA for Houghton NDP??

Thanks understood.

I will need to provide the sites assessed by AECOM for the consultees but will not provide the detail at this time.

The consultees can see the outcomes for the chosen sites as part of the draft plan (which I will also need to send to them).

Let me know if this is ok, but without sending through sufficient data they will be unable to come to a view whether there has been sufficient consideration of the alternative options in the preparation of the Plan

From:

Sent: 20 September 2024 11:31

To:

Subject: RE: SEA for Houghton NDP??

Thanks understood.

I will need to provide the sites assessed by AECOM for the consultees but will not provide the detail at this time.

The consultees can see the outcomes for the chosen sites as part of the draft plan (which I will also need to send to them).

Let me know if this is ok, but without sending through sufficient data they will be unable to come to a view whether there has been sufficient consideration of the alternative options in the preparation of the Plan

From:

Sent: 19 September 2024 14:52

To:

Cc:

Subject: RE: SEA for Houghton NDP??

Btw

I note the evidence and rationale for the policy and reference to the AECOM report, but I have not seen this - unless I am missing something

From: Sent: 19 September 2024 14:50

To:

Cc:

Subject: RE: SEA for Houghton NDP??

Importance: High

I am just finishing up the SEA screening. The level of development proposed in the plan is considerable and I am trying to pre-empt any comments the consultees may bring forward (usually Historic England).

Has the QB undertaken housing site assessments to compare the reasonable alternative sites and assess them against each other for potential detrimental impact on natural or historic environment?

If you have done this can I have them please?

If not, it may be the weakness in the evidence base for the plan and an appropriate assessment to ascertain whether the proposed allocated sites are the most appropriate might have to be undertaken.

I look forward to hearing from you

From

Sent: 17 March 2025 11:01

To:

Cc:

Subject: RE: Houghton: Heritage Impact Assessment

Thanks for the message.

I was trying keep you updated of the reasons for the SEA determination and comms with Historic England (HE) as we went along.

The reasons for the Historic Impact Assessment (HIA) are because Historic England do not believe that the affect on the heritage environment has been sufficiently assessed as part of the Plan or as part of the application for the land on Stretton Lane. The responses from HE are included in the determination, which clearly set out their view.

I did ask of HE the questions that the PC are very reasonably asking. And these are set out in my email to you of 12 November 2024.

As statutory consultees the LPA will give their view substantial weight in coming to its decision. The Plan, if submitted without the HIA, runs the risk of challenge from HE. The Independent Examiner will then need to consider whether the Plan has been sufficiently evidenced. At best, the examiner may seek a public hearing for the Plan, which will involve the PC being in attendance to make their case and justify the Plan evidence. At worst, the Examiner could delay the examination until further evidence is available to justify the allocation.

Having been involved with one public hearing for a neighbourhood plan, I think it is best we try and avoid another as it creates delay and uncertainty for the Plan.

Your assessment below of what is required for an HIA is reasonable in my view, but I am not an expert in HIAs. I cannot tell you how much it will cost, but it may be worthwhile approaching the same company that undertook the Heritage Assessment for the development site as they should have the baseline information. The additional work that will have to be undertaken is assessment for heritage impact of the reasonable alternatives for development sites.

[Historic England](#) have produced a [guidance note](#) for groups undertaking neighbourhood plans in order for them to consider the heritage environment. Section 4 deals with SEAs. As the site is now proposed to be allocated in the Local Plan under policy HH2, it may be reasonable to rely on the evidence and assessment of the site undertaken as part of the Local Plan preparation. An SEA does not need to assess every policy area but should be of sufficient detail to give confidence that the most reasonable policy approach has been followed. It is evident from HE's response to the SEA screening that they consider the Plan requires some further work to support the policy approach proposed. The Local Plan evidence should help provide the information required for assessment of the alternatives and will be invaluable for whoever undertakes the HIA.

HE in their guidance state:

118. From a heritage perspective, an SEA is less likely to be needed if:

- the plan does not include site allocations or other policies that would establish a presumption in favour of development where none currently exists and/or
- the sites for development in a neighbourhood plan have already been specifically assessed through the SEA of a local plan and/or

- the plan does not include policies that will impact significantly on heritage assets

I have also received an email from [REDACTED] concerning the Local Plan allocations in Houghton and the implications for the Houghton Plan. I will respond to [REDACTED] separately and copy you in.

NDHAs or DHAs? – given that NDHAs form an important part of the heritage landscape and profile for Houghton on the Hill, it would be good practice to include them as part of the assessment.

As HE were concerned about the impact on the conservation area from the Stretton Road site, the question will need to be answered is there another site that will provide less impact on the heritage environment, and would that be a better alternative site? A HIA should also provide evidence of the requirements for mitigation of the impacts, should there be any, as part of an allocation.

Of course, heritage is not the only consideration for assessing a site as suitable for allocation, but armed with the HIA the examiner can be assured that it has been given sufficient consideration, and the site can be the most 'sustainable'. Other community benefits, environmental considerations, design etc will also be considered as part of the site assessment process.

Hope this helps

From

Sent: 13 May 2025 13:38

To:

Cc:

Subject: RE: Houghton emerging NDP and Site Allocations.

Importance: High

I have commenced a review of the requirement for an SEA (or suitable assessment) to be undertaken for the Houghton on the Hill NDP Review.

In the light of your comments concerning the removal of the policy for allocation of 24 dwellings on Land north of Stretton Lane, I will need to be able to access a draft plan as intended for submission and send it to Historic England for comments. (Historic England were the only organisation to consider that the policy required a further suitable assessment).

The reason for this is that if we do not get HE comments on the amendment, the Examiner could suspend the examination until we have received their comments. None of us want to be in that situation, I am sure.

One other thing that Houghton should consider is whether the Plan has substantially changed from the draft that was consulted on at Regulation 14 stage in August 2024. If it has substantially changed then it may be worthwhile seeking representations from stakeholders and community again – even if it is only on the change in policy approach.

I look forward to receiving the amended draft when available

From:

Sent: Monday, September 2, 2024 12:10:04 PM

To:

Cc:

Subject: RE: Houghton NDP Consultation draft

Hi

My understanding is that Policy GD2 and H3 of the Harborough Local Plan 2011-2031 allow for some flexibility to support proposals on the edge of settlement locations that meet an identified housing need. Therefore, I would suggest that neighbourhood plans provide scope to allocate residential sites on the edge of settlement locations if it can be demonstrated that the proposal complies with the relevant development plan policies. In this case it is noted that the evidence and rationale presented for Policy L3B is not to meet an identified housing need in line with Policy GD2 and H3 of the Local Plan and that the policy criteria don't set out requirements for the housing to be affordable. This raises questions about the allocation and potential conflict with the Local Plan.

You mentioned a general policy regarding exception sites might be suitable rather than an allocation. I would be worried that could lead to duplication with the Local Plan and alternatively it might be possible to amend Policy L3B together and link to evidence on local housing needs to ensure closer alignment with the Local Plan and reflect the current planning application.

Regards

From:

Sent: Thursday, August 29, 2024 10:17 AM

To:

Cc: <

Subject: RE: Houghton NDP Consultation draft

I have just had a telephone call with H on the H re the NDP draft.

They have asked about the Exception Site (policy L3B) and whether this can be allocated as if it is an allocation, it is not an exception (?)

Minster Homes have had some lengthy conversations with the QB and are happy to meet all the criteria in the draft policy, but I am unsure how this would stack up with current policy requirements as the NDP is unlikely to be made before the submission of Minster Homes application.

Note Minster Homes have a current application 24/00359/FUL which is under consideration. They will submit a revised application with the public car park included in September 2024.

Would a more general policy regarding exception sites be suitable rather than an allocation? Or a policy requiring any new development within vicinity of the school to provide additional public car parking?

Happy to speak about this. I have copied in [REDACTED] who is the case officer for the above application

From:

Sent: 13 September 2024 10:00

To: Houghton on the Hill -

Subject: DM officer comments re: Stretton Lane

We can provide the feedback below for the NDP. Hope this is useful

DM officer comments in relation to the allocation N of Stretton Lane.

I have a live application 24/00359/FUL, which is sitting dormant at present while the applicant works up a viability report and makes changes to the scheme to respond to the initial round of comments. I'm a bit out of the loop as to the current discussions, but I hear that the applicant is actively liaising with the NP group and Parish Council – to the extent that they have later revisions of the plans that have not been formally submitted to me for re-consultation yet.

Rural Exceptions Site??

The NP group, through Cllr Burrell are asking me if I am classing it as a rural exception site. I'm a bit confused about this point and its not 100% clear what the applicant is intending. I think this may all be evolving day to day.

In June 2023 I gave pre-app – at that time they were advancing their site as an “entry level exceptions site” under the (old) NPPF para 72. I accepted it could be treated as an exceptions site on this basis (being less than 5% of the total number of dwellings in the settlement) and advised that applying H3 and GD2 it could be supported subject to evidence on need and a strong case on landscape character.

In Dec 2024 NPPF was revised and the term “**community led** exceptions site” replaced entry level exceptions site.

The applicants then dropped reference to NPPF exceptions in their formal application, advancing it instead as a policy compliant scheme, compliant with GD2 and H3 (potentially is).

But it seems with all the liaison with the NP and PC they may be trying to turn this into a Community Led scheme.

So basically I’m not sure now if this is an exception site or not.

If it is, then it can’t be an allocation – exceptions sites are by definition not allocated.

If it is not, and it is going to be an allocation I could really do with knowing asap, definitely before I make my planning assessment, as I don’t want to undermine the objectives of the emerging plan.

I’d normally say my application will overtake the NP in timescales but I’m not so sure as they have gone so quiet and I get the feeling they are keener to get an allocation than focus on the application just now.

As for the detail of the policy wording:

- If it is going to be an allocation it can’t be referred to as a rural exception site in the opening sentence
- Agree with comments by colleagues about local connection and allocation not being a matter for the NP
- Excluding 1-bed units seems unusual – usually we like a mix. The submitted plans in my application shows 4.no 1-bed maisonettes, which I would say was reasonable (version 102-P04 received March 2024).
- The requirement for a 20 space car park at the front will have a negative visual impact which is a shame when the initial proposal I have in at present shows a sensitive soft landscaped proposal. Highways will have their requirements in order for making this work. It will also give more urbanisation at this end of the village which could open the door for more development. A question of being careful what you wish for.

- The NP can't dictate a speed limit change – this is a LCC Highways matter and if they don't want it then the TRO won't happen. It is extremely unlikely LCC would agree to 20mph for “the sharp bends to the south”.



From:

Sent: Monday, August 19, 2024 10:37 AM

To: Strategic Planning Team

Subject: FW: Houghton NDP Consultation draft

All

Houghton on the Hill PC has provided us with the first full draft of their proposed NDP for the purposes of SEA screening and for comments etc.

I will undertake the SEA screening the next couple of weeks, however colleagues may want to comment prior to the PC issuing the pre-submission consultation.

A few points to note:

1. HH NDP proposed plan period is to 2040 – probably should be 2041?
2. Are there sufficient housing allocations to meet Local Plan requirements to 2040/41? The plan provides for about 100 dw. On Land north of A47, west of Houghton (80 dw) and land off Stretton Road (24 dw)
3. Is there an updated settlement profile? (they reference the 2015 profile)

4. Policy L1 refers to Core Strategy CS11???
5. Settlement Boundary needs to be checked to be consistent with allocation on Stretton Road (Policy L3B)
6. Not sure the phasing policy is consistent with the allocations policy

If colleague shave any comments I would be grateful to receive these by 31 August 2024

From:

Sent: 18 March 2025 10:48

To:

Subject: RE: Houghton on the Hill

I have asked for comments from colleagues that prepared the Local Plan draft and especially the question you have asked about inclusion of the allocation in the Houghton NDP.

PPG states:

What if a local planning authority is also intending to allocate sites in the same neighbourhood area?

If a local planning authority is also intending to allocate sites in the same neighbourhood area the local planning authority should avoid duplicating planning processes that will apply to the neighbourhood area. It should work constructively with a qualifying body to enable a neighbourhood plan to make timely progress. A local planning authority should share evidence with those preparing the neighbourhood plan, in order for example, that every effort can be made to meet identified local need through the neighbourhood planning process.

Paragraph: 043 Reference ID: 41-043-20140306

Revision date: 06 03 2014

PPG also states that 'Neighbourhood plans should not re-allocate sites that are already allocated through these strategic plans [Local Plans].' Ref Paragraph: 044 Reference ID: 41-044-20190509

In my view the allocation in a neighbourhood plan could provide additional local detail for the requirements from a site e.g. Stretton Lane would require a community car park to be provided as part of the neighbourhood plan allocation, but this appears to not be included in HH2.

The [SA for the Local Plan](#) has assessed the alternative sites in Houghton on the Hill, and this might be something that a future heritage assessment can build on

I will update you when I have a response from colleagues

From:

Sent: 25 March 2025 13:52

To:

Subject: RE: Houghton on the Hill

I have asked Local Plan colleagues about this and received the following information

The Local Plan can be amended through modifications at examination.

It is suggested that H on the H make representations during Reg 19 that they wish to allocate the sites in Houghton as part of the NDP.

It is likely the NDP will be submitted for examination prior to adoption of the Local Plan, so at that time the requirement for allocation of the two sites in the LP will fall away.

We can agree with the examiner that the sites have been allocated and are part of the development plan, so no need to allocate in the LP.

The local requirements for the sites can be included in the NDP policy.

My understanding is that the application is going through some viability discussions and if it is to be allocated in the NDP there will need to be a Heritage Assessment for the NDP as per the recommendation from Historic England

Hope this helps

From:

Sent: 16 March 2025 10:21

To:

Subject: Houghton on the Hill

Hi Hope the holiday was good!

It was disappointing to see the two Local Plan allocations for Houghton on the Hill mirroring those in the Neighbourhood Plan. As you know, this removes the potential for the NP to secure the benefit of Paragraph 14 of the NPPF and effectively removes the allocations from the NP.

If Houghton on the Hill wish to secure the additional protection, it seems that they will have to identify further allocations and, I suspect, re-run Regulation 14 as this will be seen as a significant change to the draft NP.

We had previously spoken about the Local Plan allocating large sites such as those at Scraptoft, but enabling neighbourhood plan groups the opportunity to undertake smaller allocations themselves.

Is there any way that the Local Plan allocations for Houghton on the Hill can be removed prior to adoption to enable the NP to undertake this task?

I'm on my way down to Cornwall on Monday morning, but would welcome the chance to have a chat about this when you have the space. I did leave a message for [REDACTED] to call me to discuss this last week, but heard nothing from her.

Thanks.