

Local Planning Advisory Panel

3rd July 2013

New Local Plan for Harborough District

Implications of Scoping Consultation Responses

Introduction

A paper entitled 'NLP Scoping Consultation – Summary of Responses' was presented to the previous meeting of the Advisory Panel, on 12th June 2013. That paper provided an overview and summary of the 120 responses received in response to the Scoping Consultation, held during March and April 2013.

This paper builds upon the summary of responses. For each new or different policy approach proposed within the Scoping Consultation, the remainder of this paper sets out in tabular format:

- A reminder of the proposed policy approach;
- An overview of the summarised responses;
- An officer recommendation on any changes needed to the proposed policy approach, based upon the consultation responses received;
- Any additional or outstanding evidence requirements needed to prepare the policy; and
- The timetable implications of any additional evidence or consultation required.

Overall recommendations and conclusions

An officer recommendation is made and explained for each policy approach in the remainder of this paper. In broad summary, **the recommendation is to continue with the overall scope of the new Local Plan, as set out in the Scoping Consultation, with the following notable changes:**

- It is recommended that the proposed phasing of development sites across the plan period is unnecessary. Instead the supply of housing land will be monitored bi-annually and annual updating of the SHLAA will ensure a continuous 5 year supply of deliverable housing land is maintained, in line with the requirements of the Framework.
- It is recommended that greater flexibility be given to the identification of sites as strategic, dependent upon the nature and scale of each settlement.

- It is recommended that consideration will be given to the inclusion of additional policies relating to a positive strategy for delivering renewable energy and a telecommunications policy, as suggested during the plan preparation process.
- It is recommended that the suggested wording amendments for existing Core Strategy policies are given consideration and used to inform updated wording of policies in the new Local Plan.
- It is recommended that policies for business and employment development consider existing and emerging evidence on sub regional employment land requirements and local economic strategy prepared by Leicester and Leicestershire Economic Partnership.

Evidence requirements

A large number of evidence studies are currently underway or being scoped. In summary these include:

- Annually updated Harborough Strategic Housing Land Availability Assessment (SHLAA)
- Settlement capacity assessment and consultation with parishes to establish housing targets for all Selected Rural Villages and above in the settlement hierarchy.
- Updated Leicester and Leicestershire Strategic Housing Market Assessment (SHMA)
- Discussion and agreement under the Duty to Co-operate between Leicester and Leicestershire LAs about appropriate distribution of housing growth across the HMA.
- Transport Assessment of housing distribution options through the Leicester and Leicestershire Integrated Transport Model (LLITM).
- Completion of the emerging Strategic Development Area (SDA) Master Plan to inform policy relating to the SDA.
- Magna Park Evidence Study (Traffic Data / Occupier Survey)
- Strategic Warehousing / B8 Study
- Assessment of possible Local Green Space sites in terms of their compliance with the criteria set out in the Framework
- Updating of the Infrastructure Schedule
- Update of the Harborough District Retail Study (2007)

In addition, the following additional evidence requirements result from the scoping consultation responses. Their need will be further considered and reported upon by officers:

- Possible need to update the Harborough District Affordable Housing Viability Assessment (2009) (the scope and timetable implications are unknown at this stage);
- Possible additional evidence needed to support possible new policies suggested relating to telecommunications and a positive strategy for renewal energy (in line with the Framework para 97) (the scope and timetable implications of any additional evidence requirements in respect of these policies are unknown at this stage).

Timetable implications

The current timetable for the new Local Plan is ambitious. The current evidence-gathering stage is likely to extend into at least the Autumn period, and thus delay preparation and consultation of a pre-submission draft new Local Plan, currently scheduled for October 2013. This is due to two main reasons:

- firstly: the number of evidence studies currently underway or being scoped, which largely results from the need to update some of the early evidence collected for the Core Strategy, which is now considered to be increasingly outdated; and
- secondly, the length of time needed to scope and prepare a Strategic Housing Market Assessment (SHMA) across the Leicester and Leicestershire Housing Market Area.

Notwithstanding the published evidence on future housing requirements in the form of the Leicester and Leicestershire Housing Requirements Study (2011) and the Harborough Housing Requirements Study, the Framework sets out a requirement for local authorities to work with partner authorities across their Housing Market Area to prepare a SHMA, in order to identify the scale and mix of projected housing needed across the Housing Market Area,

The Assessment requires specialist advice on housing projections and demographics and will require to be externally commissioned. It requires co-operation of eight local authorities within the Leicester and Housing Market Area and reaching agreement on the principle and overall timetable for the completion of the SHMA has taken some time, but is now coming to a conclusion.

Officers of this authority have been instrumental in obtaining commitment to this work across the HMA and an initial project meeting is taking place on July 2nd to discuss the brief and commissioning process.

Some authorities in Leicestershire are currently intending to publish and submit their Plans ahead of the completion of an up to date SHMA and relying on the existing GL Hearn work. However this poses risks since the Plan may not be compliant with the

Framework. The development of the existing GL Hearn evidence into a NPPF compliant SHMA will have a significant impact upon the overall timetable of the new Local Plan – in particular submission of the Plan for examination. In addition, the requirements of the Sustainability Appraisal (SA) need to be more fully considered and worked into the timetable. This is likely to be undertaken externally, but time will be needed for the SA consultants to complete their work and for this to be presented to officers (and Members where appropriate) and considered in terms of its implications for assessing options and preparing policy.

Next Steps

Officers will continue to work on the evidence requirements listed above and to finalise their scope as necessary. This will provide a clearer understanding of the likely timescales for individual evidence studies, particularly the SHMA. A revised timetable will be presented to a subsequent meeting of the Advisory Panel.

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New Local Plan for Harborough District
Implications of Scoping Consultation Responses

Summary of proposed policy approach (as set out in the Scoping Consultation paper)	Summary of consultation responses	Officer recommendation: proposed amendments to policy approach	Resulting / outstanding evidence requirements	Timetable implications
Housing Requirements and Distribution across the District (Policy CS2: Delivering New Housing)				
<p>This policy will be amended to incorporate: the revised total housing requirements to 2031; the distribution of total housing requirements between sustainable settlements; phasing across the plan period; and the delivery of development through Neighbourhood Development Plans. The policy will be based upon the current settlement hierarchy, which seeks to direct development to the most sustainable settlements, whilst addressing local need.</p>	<p>The approach to updating housing requirements and distribution was supported by the majority of respondents answering the question. Residents accounted for most of those disagreeing with the approach whilst the development industry accounted for more than half of those in agreement. Neighbouring authorities highlighted the need to carry out further work in relation to housing need and distribution across Leicestershire under the duty to cooperate. Concerns were raised</p>	<p>In view of the broad support for the proposed approach and its NPPF compliance, no significant amendment to the proposed policy approach is recommended.</p> <p>However, responses have highlighted the need for robust evidence to support policy preparation in relation to the scale and distribution of housing (both across the HMA and within the District). Key resulting evidence requirements and their timetables are set out in</p>	<ol style="list-style-type: none"> 1. Annually updated Harborough Strategic Housing Land Availability Assessment (SHLAA) 2. Settlement capacity assessment and consultation with parishes needed in order to establish housing targets for all Selected Rural Villages and above in the settlement hierarchy. 3. Updated Leicester and Leicestershire Strategic Housing Market Assessment (SHMA) 	<ol style="list-style-type: none"> 1. 2013 SHLAA Update is currently being planned, to be undertaken in-house by officers in the Strategic Planning team and due to be completed by end July. 2. The scope of this work has not been clarified, but it is likely to take approx. 6 months to undertake. 3. Update to be carried out jointly by consultants on behalf of all 7 LAs across Leics. Agreement in principle to undertake the update. Project

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	<p>regarding the economic assumptions underpinning the Housing Requirements Study. A wide range of views were expressed in relation to where new development should be located in the District, reflecting local and developer interests.</p>	<p>the next columns. Further recommendations in relation to the proposed approach to phasing and Neighbourhood Development Plans are set out in subsequent sections below.</p>	<p>4. Discussion and agreement under the Duty to Co-operate between Leicester and Leicestershire LAs about appropriate distribution of housing growth across the HMA.</p> <p>5. Transport Assessment of housing distribution options through the Leicester and Leicestershire Integrated Transport Model (LLITM).</p>	<p>timetable of 6 -9 months suggested, with indications of future housing requirements potentially available approx. 3 months after appointment of consultants. Project Brief currently being prepared by Stephen Pointer. <u>Start date and length of project likely to have a significant impact upon NLP timetable.</u></p> <p>4. No agreement yet on governance arrangements for decision-making body.</p> <p>5. Needs input of housing numbers and distribution options (reliant on SHLAA update, discussed at 3). Provisional dates of October to end December 2013 discussed.</p>

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New Policy: Refreshing the approach to Limits to Development				
<p>The proposed new criteria-based policy would be used for determining planning applications for new housing and other developments on non-allocated sites relating to Sustainable Rural Settlements or above in the settlement hierarchy. This policy should ensure that development only takes place on sustainable and suitable sites. This new policy will conform to the spatial strategy for Harborough as set out in Policy CS1. The intention is that this new policy will replace saved Local Plan policy HS8: Limits to Development and the associated identified Limits to Development.</p>	<p>Just over half of respondents to the question expressed support for replacing limits to development although some concern was raised that criteria could be overly restrictive. There was little support from local communities for criteria based policy as limits to development are seen as easy to understand and valuable in resisting inappropriate development. Community support was expressed for settlement targets providing communities are consulted. The approach to how non-allocated sites will be included in the 5-year supply figures was questioned in light of the Framework.</p>	<p>The benefits of additional flexibility and increased robustness of the proposed policy approach (when compared with the increasingly outdated current Limits to Development) are considered to outweigh concerns. Clear, robust and locally-appropriate criteria are considered to offer the most robust policy tool for ensuring development occurs in the most suitable locations and resisting inappropriate development. No significant amendment to the proposed policy approach is recommended.</p> <p>A number of responses have provided additional / amended criteria or further</p>	<p>1. Settlement capacity assessment and consultation with parishes needed in order to establish housing targets for all Selected Rural Villages and above in the settlement hierarchy.</p>	<p>1. The scope of this work has not been clarified, but it is likely to take approx. 6 months to undertake.</p>

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		<p>advice, which will inform the preparation of the final policy.</p> <p>In light of concerns about the criteria being too restrictive, and to allow for very limited development in areas below Selected Rural Village level, it is suggested that additional criteria could be added to determine housing proposals in such areas in line with the Framework para 55. Such criteria could be used to ensure that development proposals: are appropriate in scale to the size of the existing settlement; have proximity to and will support existing services in a nearby Selected Rural Village, Rural Centre or above in the settlement hierarchy.</p>		

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Phasing of Development (Policy CS2: Delivering New Housing)				
<p>This policy will be amended to incorporate a phasing element to ensure that there is a continuous supply of housing delivered throughout the plan period and to provide the right planning framework to deliver the strategic objectives for individual settlements and the District.</p>	<p>Opinion on this question was split across all respondent groups. Whilst just over half of respondents to the question supported the proposed introduction of a phasing policy, several have questioned whether such an approach would be Framework compliant, given the need for a rolling 5 year supply of deliverable housing.</p>	<p>It is recommended that internal phasing of the delivery of strategic sites is managed to ensure that appropriate infrastructure, services and facilities are provided to meet the needs arising from the development.</p> <p>However, it is recommended that the proposed phasing of development sites across the plan period is unnecessary. Instead it is anticipated that the combination of: allocated strategic sites; specific deliverable and developable sites; and housing targets for individual settlements representing broad locations for development will provide a good range</p>	<ol style="list-style-type: none"> 1. Bi-annual housing land supply monitoring. 2. Annually updated Harborough Strategic Housing Land Availability Assessment (SHLAA) 	<ol style="list-style-type: none"> 1. Monitoring position to end April 2013 recently published. 2. 2013 SHLAA Update is currently being planned, to be undertaken in-house by officers in the Strategic Planning team and due to be completed by end July.

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		of sites ensuring a gradual delivery of new dwellings across the plan period. The supply of housing land will be monitored bi-annually and annual updating of the SHLAA will ensure a continuous 5 year supply of deliverable housing land is maintained, in line with the requirements of the Framework.		
Identifying Strategic Allocations (Policies for Places: CS13-CS17)				
The allocation of strategic, housing, employment and other sites to provide certainty about the location of significant growth for the District. A minimum of 50 dwellings suggested at this stage. A key test would be whether delivery of the site is considered essential to the achievement of the new Local Plan's objectives	Opinion on the approach to identifying strategic allocations was split more or less equally. Most of those in opposing the approach were residents. Support was expressed for identifying strategic allocations but there was feedback that a degree of flexibility would need to be applied depending on the settlement. Concerns were	It is recommended that greater flexibility be given to the identification of sites as strategic, dependent upon the nature and scale of each settlement. Decisions upon which sites will be identified as strategic and therefore allocated will be based upon the capacity and needs of each settlement	1. Annually updated Harborough Strategic Housing Land Availability Assessment (SHLAA)	1. 2013 SHLAA Update is currently being planned, to be undertaken in-house by officers in the Strategic Planning team and due to be completed by end July.

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and overall spatial strategy.	raised as to whether the approach meets requirements of the Framework in so far as seeking opportunities to meet development needs and clearly identifying land for housing development. Further consideration of the approach in light of the need to maintain a 5 year housing supply was also advised.	and in light of evidence relating to the range, scale and mix of suitable deliverable sites identified for each settlement through the SHLAA Update.		
Market Harbour Strategic Development Area (Policy CS 13: Market Harbour)				
Along with other changes this policy will be amended to include the strategic policies for the Strategic Development Area reflecting the evidence contained in the SDA Master Plan and to provide for liaison with Lubenham Parish Council with regard to complementary policy	Although opinion was split, the majority of those objecting to the approach were residents. Many respondents expressed their objection to the proposed increase in size of the SDA (compared to the minimum of 1,000 dwellings set out in the Core Strategy), believing it to be excessive in light of	No significant amendment to the proposed policy approach is recommended. Given the likely scale of development envisaged for the District up to 2031, it is likely that Market Harbour as the most sustainable settlement in the District will have to	1. The emerging SDA Master Plan will be the key piece of evidence in preparing policy relating to the SDA. . It is intended that the Master Plan will make reference to a specific town centre scheme along with a package of other mitigation measures as part of an	1. It is expected that the Master Plan will be completed by September 2013.

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<p>coverage of topics between the new Local Plan for Harborough and the Lubenham Neighbourhood Plan.</p>	<p>previous consultation results. Exploration of comprehensive transport solutions and mitigations as part of the Local Plan was advised. Concern was raised over the proposed role of the Lubenham Neighbourhood Plan. The design of the SDA and the identification of a strategic separation area were considered outside the remit of a Neighbourhood Plan.</p>	<p>accommodate a substantial proportion of this. The SDA provides an effective way of ensuring the necessary infrastructure, services and facilities are delivered alongside substantial housing development. The agreement with Lubenham regarding the split between issues to be dealt with in their Neighbourhood Plan and the more strategic issues to be set out in the Local has been finalised alongside the declaration of the Lubenham Neighbourhood Area.</p> <p>It is recommended that the Local Plan sets out strategic planning policies for the SDA based on the provisions of the emerging Master Plan. The Lubenham Neighbourhood Plan will deal with more local issues relating to the</p>	<p>overall list of infrastructure requirements, which is costed and agreed in terms of delivery. This will be important information for preparing strategic policy in relation to the SDA and the surrounding area.</p>	

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		part of the SDA within the parish, including defining the Separation Area.		
Providing for Gypsy, Traveller and Travelling Showpeople Needs (Policy CS4: Providing for Gypsy, Traveller and Travelling Showpeople Needs)				
This policy will be amended to provide a 5 year supply of specific, deliverable sites against locally set targets and develop sites/broad locations for 6-10 years and where possible 11-15 years.	The majority of respondents to this question agreed with the approach set out and recognised the need to plan for the needs of the gypsy and traveller communities. However, a high proportion of those disagreeing with the approach were residents some of whom questioned the need for additional pitches, suggesting that existing sites are sufficient.	No significant amendment to the proposed policy approach is recommended. General agreement to proposed approach and new revised evidence sets out District wide targets for every 5 yrs. New evidence also sets out our need requirements and clear methodology for how the need was determined, why it is there and where the need comes from. Although some existing sites could be expanded, this alone will not meet the required need.	<ol style="list-style-type: none"> 1. Leicestershire, Leicester and Rutland Gypsy and Traveller Accommodation Assessment (GTAA) 2. Annually updated Harborough Strategic Housing Land Availability Assessment (SHLAA) to include any potential new gypsy and traveller sites. 	<ol style="list-style-type: none"> 1. GTAA Refresh completed by DMU in May 2013 2. 2013 SHLAA Update is currently being planned, to be undertaken in-house by officers in the Strategic Planning team and due to be completed by end July.

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Rural Economy (Policies CS7: Enabling Employment and Business Development , Policy CS17: Countryside, Rural Centres and Rural Villages)				
<p>In relation to the rural economy CS7f/CS17 will be amended to reflect para 28 of the Framework (supporting a prosperous rural economy). A specific strategic allocation for Magna Park, Lutterworth and Bruntingthorpe Proving Ground in view of their significance and location within the countryside will be set out in CS17.</p>	<p>The majority of respondents to this question were in broad agreement with the approach set out, with almost of half of these being residents. Many responses highlighted the need to ensure conformity with the Framework's support for economic growth in rural areas, while others highlighted the need to protect the countryside. A number of specific comments were made in relation to both Magna Park and Bruntingthorpe Proving Ground. Some comments highlighted the uniqueness of each and their need for specific policy treatment, with others expressing satisfaction with the</p>	<p>General agreement to approach. No significant amendment to the proposed policy scope is recommended. Comments will inform detailed policy preparation.</p> <p>Responses highlight the need to explain why specific policy elements for Magna Park (MP) and Bruntingthorpe Proving Ground (BPG) are included within CS17 within policy narrative.</p> <p>It is recommended that in the light of the L&L Employment Land Study Update 2013 recommendation v) we jointly pursue, with relevant Leicestershire</p>	<ol style="list-style-type: none"> 1. Magna Park Evidence Study (Traffic Data / Occupier Survey) – in progress by Gazeley. May assist in preparation of specific policy (for development management) within CS17 for MP site. 2. Strategic Warehousing / B8 Study (to build on L&L Employment Land Study Update 2013 recommendation v) – This evidence will inform review of CS7h) / specific policy, and the preparation of specific policy within CS17. 	<ol style="list-style-type: none"> 1. Likely available late summer 2013. 2. In progress, scope of work not yet clarified. Study unlikely to be available before Nov/Dec 2014.

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	existing policy approach to these two sites.	authorities, the commissioning of additional evidence on Strategic Warehousing and reflect on evidence of need and potential supply within the sub-region to inform approaches to strategic warehousing in the new LP.		
New Policy: Refreshing the approach to Important Open Land				
The proposed new criteria-based policy would be used for determining planning applications for new housing and other developments on non-allocated sites. This policy should ensure that development only takes place on sustainable and suitable sites. This new policy will conform to the spatial strategy for Harborough as set out in Policy CS1. The intention	The majority of respondents to the question were in support of the approach to important open land. The opinion of residents is split but more are in support of the proposed replacement of the existing Important Open Land with criteria to consider the appropriateness of applications than oppose. Respondents have made suggestions about the	In view of general support for proposed approach, no significant amendment to the proposed policy approach is recommended. However, further clarity will be needed within the policy and supporting text to explain the role and differences between the main 'green' policy tools.	1. Sites submitted by Parish Councils to HDC to consider allocating as Local Green Spaces are currently being assessed in terms of their compliance with the criteria set out in the Framework and additional evidence sought from Parish Councils to support sites where evidence was not originally	1. The assessment of potential LGS sites submitted is currently being undertaken by the Neighbourhood and Local Greenspace Officer and due to be completed by October 2013.

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is that this new policy will replace saved Local Plan policy HS8: Limits to Development and the associated identified Limits to Development.	wording of the criteria. However, responses highlight some confusion over the various 'green' policy tools being proposed (including the criteria-based policy, Local Green Spaces, Areas of Separation and Green Wedges). A number of respondents considered that the existing Important Open Land policy should be maintained and the designations reviewed.		submitted.	
New Policy: Delivery of Development through Neighbourhood Development Plans				
This new policy will explain the complementary relationship between the new Local Plan and future Neighbourhood Development Plans.	There was much support expressed for the approach to development through Neighbourhood Plans across parishes, residents and developers. Many comments highlighted the importance of ensuring a successful relationship between policies in the new Local	There is no significant proposed amendment to the policy, given the broad support received through the scoping consultation. It is important that clear advice continues to be given to Parishes and others concerning the	Advice will continue to be given to Parish Council and NDP groups concerning preparation of NDPs. The advice will be reviewed and updated as new policy and best practice emerge.	None

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	<p>Plan and those in Neighbourhood Plans. A number of respondents highlighted the responsibility of the Local Plan for ensuring an adequate supply of housing land is delivered and expressed concern should this role be delegated to NDPs.</p>	<p>need for NDP policies to be in broad conformity with New Local Plan policies, especially during the transition from Core Strategy to NLP.</p> <p>Adequate 5 year housing supply will continue to be delivered through District Council policies with Neighbourhood Plans supporting this.</p>	<p>The Neighbourhood and Green Spaces Officer has responsibility as the first point of contact for Parish Councils, ensuring that a consistent advice is given to those interested in preparing a NDP. Other Strategic Planning officers are allocated responsibility for further support and advice</p>	
New Policy: Protecting and Improving Local Services and Facilities				
<p>This will be a new comprehensive and cohesive policy aimed at the protection and improvement of services across the District, reflecting the Framework requirement to plan positively for the provision of community services and facilities, including</p>	<p>Whilst the majority of respondents to this question were supportive of the approach, many queried how this policy would be delivered and, in particular, where the funding for the improvement of services would come from.</p>	<p>The level of support shown for the aims of this new policy reflect the importance local communities attach to local services and facilities.</p> <p>It is recommended that a comprehensive policy relating to protecting and</p>	<p>1. Work with local communities in establishing what they consider to be 'valued' services and facilities. This could form part of the Settlement Capacity Assessment work and associated consultation with communities.</p>	<p>1. Scope and therefore timetable of the Settlement Capacity work not yet clarified.</p>

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broadband and facilities for burial and cremation.		improving local services is progressed. The policy will aim at facilitating new and improved services/facilities which will serve to make communities more sustainable. A policy approach to guarding against the unnecessary loss of currently valued services/facilities will be set out with the help of the Development Management team.		
Delivering Development & Supporting Infrastructure (Policy CS12: Delivering Development and Supporting Infrastructure)				
This policy will provide an updated strategic approach to ensure that future development is supported by the necessary community infrastructure. This new policy will conform to the new Local Plan spatial strategy and the development policies for	The majority of respondents to this question supported the approach to delivering development, with almost half of these being residents. However, the need for additional detailing through the infrastructure schedule was highlighted. Viability	It is accepted that the Local Plan Infrastructure Schedule could be revised and improved with additional detail as appropriate. Consultation with providers will therefore take place with a specific requirement that providers supply cost estimates. Viability is an	Early contact with providers to establish CIL compliant infrastructure requirements based on delivery of 440 dwellings pa. This may influence choice of preferred option and subsequent contact establish new infrastructure list based on submitted development	Undertaken in parallel with transport assessment process since this will determine transport requirements (provisional completion date of end Dec 2013). No specific timetable issues apart from this.

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<p>Harborough as set out in policies elsewhere in the plan and will be updated to reflect on-going work on the emerging Community Infrastructure Levy.</p>	<p>was also raised as a key consideration during the preparation of future policy.</p>	<p>important factor which has already been examined through a Leicester and Leicestershire CIL Viability Assessment which provides evidence as to the types of development which can be expected to fund infrastructure requirements and those where viability is an issue.</p>	<p>option</p>	
Additional Comments on Scoping Paper				
<p>A number of respondents seek amendments to the wording of existing Core Strategy policies, including:</p> <ul style="list-style-type: none"> • The need to refer to 'strategic priorities' rather than 'strategic objectives' to conform with the Framework; • English Heritage recommend that separate policies for design and the historic 		<p>Submitted comments will be used to inform wording amendments to existing policies, as appropriate.</p> <p>Consideration will be given to the need to update the Harborough District Affordable Housing Viability Assessment (2009), particularly to take account of changes in the housing land market and possible future impacts of</p>	<p>Possible need to update the Harborough District Affordable Housing Viability Assessment (2009).</p>	<p>Scope and timetable implications of any future possible update of the Viability Assessment are unknown at this stage.</p>

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<p>environment be considered;</p> <ul style="list-style-type: none"> The Environment Agency has submitted comments in relation to water quality, waste, location of industrial sites and policies CS4, CS8-11; Anglian Water considers the policy could be stronger on surface water management and recommends CS10 e) is revised to require a reduction in risk of flooding from all sources. <p>Other comments specifically seek additional evidence:</p> <ul style="list-style-type: none"> Re: CS3 Affordable Housing - it is essential the evidence is updated now to support this policy 		<p>any CIL or changes to Section 106 requirements within the District.</p> <p>Consideration will be given to the inclusion of the additional policies suggested as the plan is prepared.</p>		

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<p>being carried forward into the new Local Plan;</p> <ul style="list-style-type: none"> • Current affordable housing policy threshold which penalises small developers and self-builders is overly restrictive and non NPPF compliant. This needs revisiting as part of the Local Plan review; <p>Additional policies suggested:</p> <ul style="list-style-type: none"> • Telecommunications policy – suggested text provided by Mono Consultants on behalf of telecoms companies. • Positive strategy towards renewable energy schemes in the District as encouraged in Paragraph 97 of the NPPF 				

