

## **New Local Plan for Harborough District 2011- 2031**

### **Scoping Consultation – Summary of Responses**

#### Background

The scoping consultation is the first stage in preparing the new Local Plan for Harborough District. Its purpose is to seek the views of interested parties on the proposed contents of the new Local Plan. These views will be used to finalise the scope of the Plan and to inform the identification of any further evidence requirements.

Scoping consultation took place between 18<sup>th</sup> March and 28<sup>th</sup> April 2013, concurrently with consultation on the draft Strategic Development Area Master Plan. Both were online consultations, with respondents encouraged to reply via a questionnaire accessed through the Council's website.

#### Responses

A total of 120 individual people and organisations responded to the New Local Plan scoping consultation. 84 of these responses were made online, with the remainder e-mailed or posted.

#### Summary of responses

This report summarises the responses to each proposed policy approach within the scoping consultation document. The report sets out the number of responses received in relation to each policy approach, the number agreeing (answering 'Yes') and the number disagreeing (answering 'No'). There is also a breakdown of the type of respondents by answer (for example, the number of Parish Councils, developers / agents or statutory consultees). For each policy approach, the report sets out an overall summary of the comments, together with key issues emerging from responses. To emphasise - the summary represents the **view of respondents** not the view of officers.

#### Next Steps

The Council will now consider the implications of the responses for the proposed scope of the new Local Plan.

## **Housing Requirements and Distribution across the District**

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| Policy CS2: Delivering New Housing | 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. |
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Do you agree with the proposed approach?

No: 30  
Yes: 57  
Not stated: 33

### **Overall Summary**

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 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.

### **Key Issues**

#### **Issues identified with the Housing Requirements Study:**

- The study's economic assumptions and growth projections are questioned given the current national economic prospects and the Council's lack of economic strategic vision. The use of historic data to predict need for future development is also questioned;
- As current housing targets have not been delivered therefore the new ones are not realistic. Regional Strategy 'objective' evidence still applicable and Framework still allows it to be drawn upon supplemented by up to date robust local evidence;
- The independence and objectivity of the GL Hearn study is questioned;
- Factors, such as transport and landscape constraints on growth, should not play any part in establishing the housing requirement. They are not relevant to the assessment of need; they are only relevant when assessing how and where to accommodate this need and cannot reasonably be used as justification simply to reduce the number of dwellings to meet housing need.

### **Need for SHMAA and agreement on distribution across HMA:**

- The recognition of the need for Strategic Housing Market Assessment (SHMA) is welcomed by other local authorities. However, the point is made that this will not address housing distribution across HMA. There needs to be further work by each of the HMA authorities following SHMA to assess if full extent of housing need can be met across HMA then assess whether its housing needs can be accommodated within District in light of the Framework. This work needs to consider and demonstrate the Duty to Cooperate.

### **Comments on Location of Development:**

- Policy focuses too much on larger settlements. There needs to be more development spread across district so that rural area does not become unsustainable;
- Spatial hierarchy may need to be revisited and the distribution between settlements will need to be reviewed with the aid of updated SHLAA evidence;
- 'Deliverability' should be a key criterion for sites and given sufficient weight;
- Good to have target for settlements but there needs to be consultation with parishes before decision on target is taken and a transparent methodology for assessing the capacity of settlements if the Local Plan is not simply going to reiterate position of Core Strategy;
- The SDA should not be rushed through before whole of District is looked at as some housing could be relocated elsewhere in District. Too many homes are planned for Market Harborough.

### **Among those supporting the approach the following points were made:**

- Need to bear in mind environmental capacity;
- Approach needs to be robust and transparent;
- Need to consider higher figure and whether it can be accommodated;
- Market Harborough should take a large proportion of development as sustainable;
- Need to express presumption in favour of development to maintain sustainability of rural areas;
- Restrict to most sustainable locations (based on transport and infrastructure).

## **Refreshing the Approach to Limits to Development**

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|--|---|
| New Policy: Refreshing the approach to Limits to Development | 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 is that this new policy will replace saved Local Plan policy HS8: Limits to Development and the associated identified Limits to Development. |
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Do you agree with the proposed approach?

No: 41

Yes: 48

Not stated: 31

### **Overall Summary**

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.

### **Key Issues**

#### **Objecting to removal of limits to development as:**

- Local communities understand limits to development and see them as the most powerful defence against unwelcome and inappropriate planning applications. Criteria based policy is too vague and open to interpretation;
- The criteria based approach could be used in addition to limits to justify building beyond limits to development;
- A review of limits as stated in Core Strategy most appropriate way forward;
- A criteria based policy must be accompanied by a review of current limits and introduction of limits for other settlements and redirection of some development to smaller rural settlements to prevent decline;
- Parishes refuse to discuss anything that affects their area. Therefore it is imperative that Parish Councils' input constructively into drawing up the criteria and realise that new housing needs to be accommodated locally where Framework compliant;
- Would be contrary to the provisions of the Framework for objectively assessing, positively planning for and meeting the needs of business.

### **Generally in agreement with removal of limits to development providing that:**

- Additional criteria relating to the following are included:
  - historic environment (English Heritage);
  - highway implications (Highway Authority);
  - protection for Green Wedges and Areas of Separation;
  - criteria should be aligned with paragraph 14 of the Framework.
- Criteria are not as overly restrictive as currently set out, are accompanied by an explanation and are subject to weighting. The criterion relating to community support needs careful consideration in terms of its weighting as this is rarely forthcoming. Reference to Landscape and Visual Impact Assessments should not be restricted to those prepared on behalf of HDC;
- A review of SHLAA is undertaken to ensure that sites on edge of settlements have been fully assessed.

### **Agree with removal of limits to development as:**

- Limits have led to overcrowded infilling in some villages and their removal would allow carefully designed development on edge of villages to come forward. The approach recognises the sustainability of a settlement and gets rid of an artificial basis for objection to development.

### **Comments on Housing Targets for Settlements:**

- There needs to be public engagement in setting housing targets with disclosure of the evidence base and the calculations used to arrive at the figure;
- The approach to handling of windfall sites, existing consents and any RSS shortfall needs to be set out;
- The targets should not be maximums;
- Policy for non-delivery needed, setting out whether a shortfall due to non-delivery in one settlement can be addressed elsewhere.

### **Comments on Strategic Allocations:**

- The proposed 50 or more dwellings is arbitrary/unsubstantiated and will prevent the formal allocation of land in SRVs and Rural Centres. Developments of less than 50 dwellings could be considered strategic in rural context;
- Allocations for residential development give certainty to landowners and developers;
- If no Neighbourhood Plan (NP) forthcoming, smaller sites should be allocated in Local Plan as parishes not preparing a NP could be exposed to inappropriate development;
- The question of whether the strategic sites will allocate sufficient housing for 5 years in order that the non-strategic, non-allocated sites do not need to be included in the housing supply figures is posed. The approach to how non-allocated sites will be included in the 5-year supply figures needs to be set out. The NPPF allows inclusion of windfall only where there is compelling evidence of past delivery, not a policy change to allow more flexibility in the future.

### **Other Concerns/Issues**

- Further engagement with parishes needed before adoption of such a policy;

- Consideration will need to be given as to how proposals should be determined for development in villages that do not currently meet the criteria for 'Selected Rural Village' in the settlement hierarchy, but where the proposal for development provides facilities or services which would enable that settlement to become a 'Selected Rural Village';

## **Phasing of Development**

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|------------------------------------|---|
| Policy CS2: Delivering New Housing | 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. |
|------------------------------------|---|

Do you agree with the proposed approach?

No: 34

Yes: 44

Not stated: 42

### **Overall Summary**

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.

### **Key Issues**

#### **Lack of justification for policy and NPPF compliance questioned:**

- Several respondents considered a phasing policy not to be compliant with the Framework. If a proposal is sustainable in planning terms it should not be held back from favourable determination. As there is no requirement in NPPF for phasing policy it would need evidence to justify it. 'Buoyant housing market' is not backed up by housing completions and projected housing completions so policy is not justified. By restricting supply, the Local Plan runs the risk of being inconsistent with the Framework's aim of boosting housing supply, encouraging sustainable economic growth and the Government's stated aims to tackle housing affordability by opening up supply;
- Others felt that it is unnecessary as the delivery of development should be considered under the allocation of development and the 5 year housing land supply in accordance with the Framework. It was felt that phasing policy would generally have a negative impact on delivery of development and could impact on 5 year supply and result in non allocated sites coming forward;
- Only rationale for imposing phasing would be on specific, larger sites and relate to sequencing to development to allow delivery of infrastructure. Delivery of other sites should not be constrained by any phasing plan;
- Approach fails to acknowledge the economics of the market;
- More clarity and detail needed before an opinion can be formed in relation to this policy, particularly in relation to the split between strategic and windfall/unallocated sites;

- Phasing makes sense so long as sufficient flexibility built in to take account of unforeseen events. Phasing should be seen as a managed flow rather than becoming an impediment to development.

**Other comments:**

- There can be no meaningful method of forcing the delivery of housing targets as house building is reactive to market conditions;
- A more appropriate approach would be to set targets for housing numbers and apply a degree of flexibility to these allowing for changes in delivery across the District;
- The introduction of strategic allocations may appear to deliver higher numbers however any phasing policy should be based on realistic trajectory rates and closely monitored with some provision that the percentage of windfalls is sufficiently flexible to redress any shortfall.

## **Identifying Strategic Allocations**

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|-----------------------------------|--|
| Policies for Places:<br>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 and overall spatial strategy. |
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Do you agree with the proposed approach?

No: 38

Yes: 40

Not stated: 42

### **Overall Summary**

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 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.

### **Key Issues**

#### **Broad support approach to identifying Strategic Allocations but:**

- Impact on historic environment must be considered and form part of site selection methodology;
- Use of words 'strategic allocations' is inappropriate and confusing as strategic suggests much larger than 50 units (more like 1000), 'planned allocations' may be better;
- Possible reduction in dwelling number in definition for smaller settlements would be necessary;
- Flexibility to meet objectives over time will be key and should be built into the strategic allocations. Sites that enable a sufficient number of houses to make a difference to meeting demand might be better than a rigid minimum of 50 houses;
- Concerns regarding the Council's position in relation to non-allocated sites and that the approach could result in a first come/first served method of delivery, potentially resulting in the best and most appropriate sites not being brought forward;
- The approach would be largely based on assumptions and open the five year supply calculation to future challenge due to the ambiguity arising from where the housing land supply will come from due to the criteria based approach;

- Defining detailed boundaries for larger sites is welcomed, however, consideration should also be given to defining boundaries for smaller sites below 50 dwellings where they are strategically important to the sustainable settlement or selected village thus giving certainty;
- Clarification is required as to how the Council will decide which sites are considered to be essential to the successful delivery of the spatial strategy and policies for places;
- This policy should encompass all developments that could be considered strategic in nature (e.g. employment, retail, leisure, facilities such as crematorium which meet strategic development requirements).
- The move towards 'Strategic Allocations' is welcomed, providing that the evidence supporting the proposed split between allocated and windfall sites is carefully considered. The windfall allowance must be justified by compelling evidence relating to past delivery;
- Allocations above and beyond the identified housing requirement should be made to ensure that the full housing requirement is actually delivered.

**Opposed to approach for following reasons:**

- Question whether it meets requirements of Framework to seek opportunities to meet development needs of their areas (paras 14) and to clearly identify land for housing development (47 and 159);
- This figure of 50 dwellings is arbitrary and unsubstantiated and will inevitably prevent the formal allocation of land in the selected Rural Villages and most of the Rural Centres which between them will need to deliver approximately a third of the housing stock throughout the plan period. This figure needs reducing to 15-20 dwellings;
- Specific concerns relate to how the allocation of only strategic sites would fit with the provision of Neighbourhood Plans and the five year housing land supply. Some areas will not be covered by neighbourhood plans and those which are preparing a plan, could be some time away. Sites smaller than 50 units are considered to be vital to the delivery of the new Local Plan and as such the threshold figure 50 dwellings is considered inappropriate and unjustified;
- The policy will need to accommodate the potential for non-allocated 'strategic sites' to come forward where they meet the relevant criteria, especially the key tests under the Framework.

**Other:**

- Whilst there needs to be a strategic development strategy, the MH SDA is too concentrated on one specific location in the District. There needs to be a wider spread (albeit of strategic development sites) though the District including the rural area.

## **Market Harborough Strategic Development Area**

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| Policy CS 13: Market Harborough | 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 coverage of topics between the new Local Plan for Harborough and the Lubenham Neighbourhood Plan. |
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Do you agree with the proposed approach?

No: 33

Yes: 33

Not stated: 54

### **Overall Summary**

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 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.

### **Key Issues**

#### **Comments opposing development of SDA:**

- Several respondents considered that previous consultation results in favour of 1000 dwellings were ignored with a general feeling that 1800 dwellings is excessive in given the Core Strategy policy;
- Determination of the Airfield Farm application should have been made after options consultation favouring 1000 dwellings;
- Logic behind decision regarding link road is flawed as the need for a link is between A6 and Northampton Road not to west of town. Also statement 'to provide transport mitigation measures as required both on and off site' presupposes that a solution to traffic problems exists but no evidence of this has been seen;
- The reliance on such a large site for the delivery of the required housing will increase the risk of under delivery of the plan, and will restrict the opportunities to provide choice and competition in the market place. Other MH sites can contribute to future housing supply and SE MH should be investigated;
- Some felt that determination of the SDA applications should be delayed until the outcome of the Local Plan is approved. There should be an awareness of all the facts arising from proper consultation before being too hasty in approving the SDA. The SDA is being rushed through without regard to meaningful

consultation, and reference to any of the new initiatives recently introduced by the Government;

- The new local plan should now be the focus of attention embracing the whole of the District and re-assessing the requirements for housing, employment and a whole raft of infrastructure issues. No allocations should be made until essential evidence relating to need, such as SHMA, is completed and considered;
- There is a lack of clarity in relation to Greenacres and the Showground.

**Issues that need to be considered:**

- Local residents must have input;
- Recognition of historic environment attributes and considerations are essential in both the new Local Plan and the Lubenham Neighbourhood Development Plan;
- Essential that the infrastructure and transport mitigation measures are deliverable and will be delivered prior to any substantial residential development on the site.

**Support approach set out but concerns relating to:**

- Proposed role of neighbourhood plan is questioned. Delegating responsibility for the appearance and design of the Council's key strategic allocation and most important development shaping the future of the District, to the Parish Council is not appropriate or supported. Planning the design of the up to 1800 dwellings goes way beyond the remit of a Neighbourhood Plan prepared by a parish the size of Lubenham. Separation Area should be identified in the Local Plan as of strategic environmental significance ('environmental significance' will need to be proved);
- Delivering housing to meet the wider need within the SDA relies on being able to set in place an agreed Master Plan document swiftly. The approach set out in the Scoping paper is therefore critical to enabling development as planned for the new Local Plan Period;
- The Increase in housing numbers part way through the process is concerning and the original scope for the SDA should have been adhered to;
- The current approach makes it difficult for the Highway Authority to deal with the proposed SDA strategically. Ideally, the new policy should be in place to inform/complement the eventual Master Plan to which planning applications should then conform. Whilst modelling work to inform the current Core Strategy has helped to identify the SDA's general transport impacts and mitigation measures required, the proposed Local Plan policy would provide clearer framework in which to secure the total package of measures required to support the SDA; establish phasing of the SDA relative to the measures; and to build in monitor and review mechanisms;.

**Other considerations:**

- The housing policy needs to cater for possible delays in delivering the SDA and flexibility within its criteria based assessments for non-allocated sites to be able to meet any shortfall in housing numbers or housing mix.

## **Providing for Gypsy, Traveller and Travelling Showpeople Needs**

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| 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. |
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Do you agree with the proposed approach?

No: 22

Yes: 40

Not stated: 58

### **Overall Summary**

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.

### **Key Issues**

#### **Support for approach:**

- The need for official sites to stop illegal development is absolutely necessary and planned pitches within Government Policy are the only way to provide security against unwanted impositions of mobile developments;
- Must be allocated in sustainable locations within easy reach of schools, shops etc.
- Needs are as important as anyone else's but smaller sites may be more acceptable;
- The needs of this distinct community are different to those of the rest of the inhabitants of Harborough District and as such they need to be considered separately. The approach to provide separate sites rather than integrate them with housing allocations is strongly supported;

#### **Opposed to policy approach:**

- Two existing sites enough for Market Harborough;
- Existing sites are not policed reliably;
- No further provision is necessary as Harborough and surrounding districts have a disproportionately high number of large sites;
- The transient nature of the communities does not dictate a need for permanent residency;
- Other sites should be spread across Leicestershire;
- Sites proposed for gypsies should be subject to consultation and agreement with local residents at least within 3 miles and not just allocated;

**Other points raised:**

- As the NPPF requires a rolling 5 year land supply to be maintained by the Council, the application of 5 year phases to this and many of the other housing policies is considered unnecessary and inappropriate;
- Any revised policy(s) should seek to safeguard highway interest. G&T sites can often be in more remote locations, on roads with high vehicle speeds and unlit (Highway Authority);
- Await completion of review before making comment. Suggest inclusion of criteria against which to assess planning applications which are not identified as part of the locally derived need and offers a contingency to allocated sites not coming forward within the timeframes envisaged;
- Support but suggest inclusion of additional 'Intended policy outcomes' as follows: 'To promote the integration of the occupants of Gypsy and Traveller sites with adjacent settled communities the location of sites should avoid adverse affects on the amenity of nearby settlements'.

## **Rural Economy**

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| Policies CS7: Enabling Employment and Business Development<br>Policy CS17: Countryside, Rural Centres and Rural Villages | 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 policy framework for Magna Park , Lutterworth and Bruntingthorpe Proving Ground in view of their significance and location within the countryside will be set out in CS17. |
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Do you agree with the proposed approach?

No: 25

Yes: 44

Not stated: 51

## **Overall Summary**

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 existing policy approach to these two sites.

## **Key Issues**

### **Support the approach set out as:**

- Rural economy all too often overlooked. Transport is major stumbling block to sustainable development but no alternative for vast majority of Harborough's residents. Some small scale growth should be allowed in smaller rural villages appropriate to settlement size along with greater control over loss of existing shops and employment uses;
- Current policy out of touch with the Framework's presumption in favour of sustainable development and need to support for economic growth in rural areas;
- A range of local jobs is important to rural communities and there should be good provision within settlements to allow non disruptive industries and employment opportunities to be developed. Proposal to continue to direct development to Rural Centres and Selected Rural Villages on sustainability grounds is supported;
- Whilst specific criteria to define special circumstances allowing for residential development outside the sustainable settlements is proposed, there is no indication as to whether similar criteria will be set out for economic development in the countryside;
- County Council support alignment with the LCC's economic growth priorities and would welcome initiatives to enhance work life balance. The Highways Authority

would have concerns if the new policy were to result in inappropriate development in rural areas that from a transport perspective was not sustainable and/or resulted in unacceptable impacts on road safety or local communities (e.g. increased levels of HGVs on unsuitable rural routes).

### **Object to approach:**

- Villages outside settlement hierarchy may benefit from modest input of new development;
- Approach too unrestrictive and does not offer enough protection for countryside;
- Thrust of proposed policies in particular relating to employment/business development in the rural area is acknowledged however the delivery of new housing policy is excessively restrictive resulting in development only in supposedly sustainable locations;
- In order to promote, and sustain, rural economies there needs to be provision to accommodate development growth within and outside settlement boundaries. This is especially important where businesses wish to expand and need to attract new skilled labour to the area rather than relocate their business out of the District;
- The evidence base that underpins CS Policy CS7 is out of date. As a consequence, all the policies that follow from and are justified by that evidence base – the CS spatial strategy (CS1), the employment policy (CS7) and the constraints placed on the expansion of Magna Park (CS17) – are also out of date. The ‘refresh’ approach does not acknowledge this or that the CS imposes constraints on economic development and growth which are inconsistent with the Framework. Too narrowly driven by need to bring housing policies in line with Framework. Multiple concerns over approach not being in line with Framework.

### **Comments re: Bruntingthorpe**

- Adequate policies already in place. Developments at Bruntingthorpe are acceptable so long as they respect the facts that there many communities within close proximity and there is a constrained local road network. Bruntingthorpe fails to meet criteria for development with regard to access, it is not located on a transport corridor, there is no public transport and the road infrastructure is mainly composed of country lanes of restricted width;
- Approach continues to foster the presumption that Bruntingthorpe Proving Ground is an exceptional site without examining or justifying the basis for this designation. The Council seem to be promoting this exception rather than raising the question. Future plans should establish an appropriate distinction between the two sites at Bruntingthorpe with appropriate conditions established to maintain continuity with the spirit of the saved local plan policies;
- There needs to be a sequential test to justify the sustainability of this relatively remote site for employment development. The sustainability appraisal of the new Local Plan should specifically do this. Affected parties must be consulted;
- Welcome approach to Bruntingthorpe as offers strategic growth option.

### **Comments re: Magna Park**

- The restrictive policy with regard to Magna Park should be removed. A planned expansion of Magna Park is fundamental to the economy of Harborough District,

the region and the country. This can be done without adversely affecting Area of Separation;

- Disagree with approach as Magna Park is not an 'exception' to countryside policies and to place it thus is at odds with the Park's established function and inconsistent with the Framework both for rural economies and economic growth. The fact that the logistics' sectors needs cannot be met on the edges of settlements or within strategic housing sites is inherently unsustainable. Therefore Magna Park should be removed from CS17 and instead have a strategic allocation and policy of its own;
- Object to further expansion of Magna Park as any future economic development should be evenly distributed across the district. Only around 8% to 10% of Magna Park employees are from Lutterworth;
- Current policy adequate. The expansion of Magna Park was dealt with and dismissed at CS examination. Any changes concerning Magna Park do not conflict with the existing policies of the Core Strategy;

**Other comments:**

- Good internet connection still a problem in some rural areas;
- Kibworth and Great Glen are sustainable settlements and should be considered for further development.

## **Refreshing the approach to Important Open Land**

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|--|---|
| New Policy: Refreshing the approach to Limits to Development | 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 is that this new policy will replace saved Local Plan policy HS8: Limits to Development and the associated identified Limits to Development. |
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Do you agree with the proposed approach?

No: 21

Yes: 48

Not Stated: 51

### **Overall summary**

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 Limits to Development with criteria to consider the appropriateness of applications than oppose. Respondents have made suggestions about the 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.

### **Key Issues**

#### **Agree with Approach providing that:**

- It is a stand alone policy rather than part of CS11 to adequately respond to development pressures. Sensible to review existing designations as Framework is clear that it is acceptable to identify land where development would be unacceptable (para 157- bullet point 7);
- Sufficient information is provided in order to allow clarity on determining the importance of a site to the character and appearance of the street/area;
- To use wording such as 'linking up with other open spaces' immediately restricts many potential sites and is far too broad;
- Separation areas need recognition;
- Should reflect balance set out in para 14 of Framework (presumption in favour of sustainable development) and set out that planning permission should be approved unless the impacts would be significant and demonstrable;
- Proposed new policy approach to these areas must provide flexibility and should not propose a set of draft criteria that are either too prescriptive or

subjective such that positive consideration of new development of an appropriate scale and form do not remain restricted;

- Include reference to green infrastructure.

**Disagree to approach for following reasons:**

- Should be a rolling 5 year review of important open land designations and not seek to dedicate additional areas. Criteria based policy very much open to opinion. There is confusion in the proposed policy between the criteria based assessment and potential designation as local green space;
- Words 'Important Open Land' and the process that lead to their designation emphasises the need to maintain existing policy. Periodic reviews of the areas designated should be undertaken within the plan period on a community basis only;
- Risk that some defined green spaces, such as the Green Wedge between Thurnby and Leicester could be undermined by this policy, as no reference is made to the presumption of development restraint that should be afforded to these areas. Criteria referencing Green Wedges and Area of Separation needed;
- More emphasis should be given to designating important open land/local green space. Much effort has already gone into identifying areas for protection through call for sites in 2012. Consistent terminology re: open land/local green space is needed;
- Some land which is deemed very valuable by the residents it affects most may not have any definable valuable characteristics. Local input is needed;
- The problem of dealing with undeveloped land within settlements may be minimized, if not eliminated, by application of clear and sensible policies covering Limits to Development and Areas of Separation.

## **Delivering Development through Neighbourhood Plans**

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| 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. |
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Do you agree with the proposed approach?

No: 17

Yes: 47

Not stated: 56

### **Overall summary**

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 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 Neighbourhood Plans.

### **Key Issues**

#### **Agree with approach provided that:**

- Communities must understand that NPs must conform to Local Planning Policies. The Local Plan must direct Parish Councils towards understanding the role of NP's in preserving their settlements whilst accommodating growth and thereby contributing towards sustaining the settlement and its key local services and facilities;
- Neighbourhood Planning Groups are consulted before decisions are made that affect the local community. Only in this way will the (new) community-led dimension in the planning process be distinguished within the traditional 'top-down' structure;
- Any allocations designated through NPs are factored into the housing land supply equation appropriately. In areas where a Neighbourhood Development Plan does not come forward the approach proposed by the Council could result in a first come/first served method of delivery and potentially result in not the best and most appropriate sites being brought forward. This approach would also be largely based on assumptions and open the five year supply calculation to future challenge due to the ambiguity from where the housing land supply will come if applications are to be based on a criteria based approach such as that proposed;
- There must be recognition that communities across the district will require time and support to get such plans in place. Many communities lack the time of volunteers to progress such matters;

- More detail on how the Local Plan will go about apportioning the amount of housing and other development to NP's needs to be provided and how under delivery can be remedied;
- Concern that the approach to allocations appears to rely solely on the production of NPs outside the SDA, with criteria based policies used where no NP is to be produced. To give certainty to developers and communities it may be helpful to consider producing allocations in some settlements with larger housing requirements where no NPs are in production. If a NP is produced in the future, it would supersede the LP allocations, giving the community the power to shape the development;

**Opposed to approach:**

- Likely to be drawn up with relatively little input from residents or much understanding;
- The Framework clearly states that the local planning authority should be responsible for the allocation of sufficient development land to meet the district's housing requirements. It is therefore considered inappropriate to delegate this responsibility to Neighbourhood Plans without providing sufficient guidance and advice. Decisions that control the location of development should not be left solely to the NPs as could result in impasse situation and delay the delivery of much needed development that will boost the local economy as required by the Framework;
- It is important for Harborough District Council to work closely with the areas progressing NPs to ensure that the revised Local Plan progresses in unison with the NPs, therefore enabling a synergy across the planning policy documents;
- Question their value of NPs and would like a concise explanation of the hierarchy of the NPPF, SDA, Local plan and neighbourhood plans;
- Contradiction as it says the new Local Plan will focus on issues of strategic importance, allocating land for strategic land uses, including employment. This conflicts with the assertion that local communities will be able to determine the location of housing, employment and other development (even if they are of strategic importance) through future allocations in future NPs;

**Other comments:**

- In those areas where neighbourhood plans are not proposed, the Local Plan should make provision for robust development management policies in order to provide a non-strategic planning policy framework for such areas. Such policies relating to historic environment considerations are essential, given the significant historic environment resource within Harborough;
- Local Plan policies need to be clear, free of equivocation and not vulnerable to subjective interpretation for successful NP to take place.

## **Protecting and Improving Local Services and Facilities**

|  |   |
|--|---|
| New Policy: Protecting and Improving Local Services and Facilities | 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 broadband and facilities for burial and cremation |
|--|---|

Do you agree with the proposed approach?

No: 10

Yes: 59

Not stated: 51

### **Overall summary**

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.

### **Key Issues**

#### **Support for policy approach but concerns regarding:**

- Doubts over its delivery and implementation expressed by several respondents;
- Policy approach to encouraging broadband has no substance. Currently grossly insufficient urgency is being given to broadband provision in rural areas, where many people try to work from home;
- Parish Councils should be encouraged to promote new local facilities to enable the community to become sustainable;
- Lack of definition. A description for the term Local Services and Facilities should be included, either in the Glossary or accompanying text (e.g. Local services and facilities are known as community facilities which provide for the health and wellbeing, social, educational, spiritual, recreational, leisure and cultural needs of the community);
- No mention of policing. Policing as a part of the community infrastructure and the Police as a key provider should be specified.

#### **Objections to approach:**

- Approach is not realistic and too vague. Even HDC is closing its satellite offices. Need to enhance and protect what we have but in reality it does not happen;
- Council should undertake a detailed audit leading to a delivery schedule to underpin discussions on planning obligations so that developers are not prohibited by onerous expectations of services and facilities.

**Other comments:**

- It should be acknowledged that the delivery of community facilities requires a degree of financial commitment from the Council(s) or the use of other funding mechanisms, such as developer contributions. New housing development can help to facilitate community infrastructure as well as contribute towards increasing demand for existing local services and facilities and this should be a key consideration in supporting and determining planning applications;
- Open Space Sport and Recreation Facilities report is almost 10 years old and considered out of date. Also there is a lack of Playing Pitch Strategy and Leicester and Rutland Sports Facilities Strategic Framework intended to cover period to 2013.

## **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 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. |
|---|---|

Do you agree with the proposed approach?

No: 15

Yes: 52

Not stated: 53

### **Overall summary**

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 was also raised as a key consideration during the preparation of future policy.

### **Key Issues**

#### **Support approach for following reasons:**

- Crucial policy within the holistic approach of the new Local Plan, and of major concern to most residents;
- Theory seems acceptable but do not believe infrastructure will get the investment spent on it;
- There needs to be some tie between actual community involvement and stating the required level of community infrastructure in association with major new development;
- Important to ensure that the policy does not prohibit the correct development coming forward. The opportunity to provide an 'open book approach' to development with high numbers of exceptional costs is encouraged;
- A sensible and grounded approach to the level of financial contributions needs to be adopted in order to comply with paragraph 205 of the Framework. Viability is an important consideration;
- Welcome detailed and up to date infrastructure schedule and production of Developer Contributions SPD in order to provide greater clarity on level of contributions sought;
- More detail is required as to best approach and how community can gain via CIL.

**Oppose the approach:**

- While supporting the aligning of LP preparation and CIL, the approach to drafting the revised policy and CIL needs to recognise the importance of careful attention to viability and costs, and the overarching need for the Plan to be deliverable. In view of the Framework a Developer Contributions SPD should not add unnecessarily to financial burdens of a development but aid applicants to make successful applications or aid infrastructure delivery. The relationship between the policy, CIL and this SPD will need to be carefully considered by the Council to ensure the policy approach is consistent with the Framework;
- Any levy needs consultation and agreement of local people.

**Other comments:**

- CIL and infrastructure development can present an opportunity for investment in sustaining the local historic environment. Archaeological investigation, public realm upgrades are examples of this and therefore should be considered in the revised policy (English Heritage);
- Approach needs to allow for a level of flexibility to cater for alternative proposals for delivering community infrastructure, such as low-cost and affordable housing. Section 106s offer a degree of negotiation with the Council to ensure that developments are viable for all parties involved, then this is preferred over a non-negotiable CIL approach;
- CIL is intended to assist in keeping infrastructures like police in tandem with development growth. This should be referred to as an important way to deliver sustainable development and infrastructure provision in addition to development site based infrastructure;
- Need to ensure that the content of the schedule and the level of the charge are conducive to, rather than an inhibitor of, the delivery of the sustainable development needed for economic growth.

## **Additional Comments on Scoping Paper:**

### **Consultation**

- Consultation needs to be clear, concise and easy to respond to. 10 minute time limit to respond to on line questions criticised several times;
- The Planning authority should make more effort to visit, explain and discuss with local people because this subject is extremely complex for non experts;

### **'Refresh' approach**

- Full review of Core Strategy would reduce potential for confusion and provide greater clarity;
- The "refresh" approach neither recognises the implications for employment of the revocation of the East Midlands Regional Plan (EMRP) nor address the inconsistencies of the Core Strategy (CS) in respect of employment with the Framework. Both need to be dealt with if the preparation of the Local Plan is to satisfy the Council's legal obligation under s110 of the Localism Act 2011 and be capable of satisfying the Framework's duty to cooperate (paras 178 and 182), the requirements for a proportionate evidence base, including in respect of the needs of the economy and business (para 161 bullets 1 and 2), and tests of soundness (para 182);
- The NPPF requires 'strategic priorities' as opposed to strategic objectives, and this change in terminology is important to note as the Plan will need to demonstrate that it is both aspirational and realistic;
- It appears that preparing a new Local Plan is seen as an opportunity to introduce many changes which appear to have little or no bearing on ensuring compliance with the Framework and to dilute policies of the Core Strategy/HDLP and replace them with policies that are ill vague and defined;
- Timetable for future changes and upgrades to New Local Plan should be set out;
- HDC urged to keep within the proposed timescale so that the current status of having a five year's supply of housing is not compromised;

### **General Policy Related**

- English Heritage considers further analysis of the existing plan in relation to the historic environment is required in order to ensure soundness. In light of this, separate policies for design and the historic environment should be considered given the historic attributes in Harborough;
- Insufficient consideration given to public transport;
- 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;
- Oadby and Wigston would need to work closely with Harborough to consider and be assured that any decisions to allocate strategic housing development sites within or adjoining the Leicester PUA, where it abuts the Borough, would fully take into account potential impacts on local infrastructure and services within Oadby and Wigston's administrative area;
- In relation to the existing Policy CS2 setting prescriptive minimum net density standards, the Scoping Consultation Paper makes no reference to this element being amended. Evidence is expected if this is to be retained;

- Re: CS3 Affordable Housing. Given the evidence base to support this policy requirement can no longer be regarded as up-to-date and certainly will not be up-to-date at the time of Examination in 2014, it is essential the evidence is updated now to support this policy being carried forward into the new Local Plan;
- Areas of Separation and Local Green Spaces to be identified in the Local Plan where they are of strategic importance, subject to any designations being supported by evidence as to their 'environmental' significance;
- Evidence is needed for CS9 changes and updating must be evidence based in relation to its impact on the viability of development;
- District continues to be a favoured destination for living and has an opportunity to exploit this asset to stimulate growth and the local economy by demonstrating that it 'welcomes investment';
- Many comments opposing SDA at MH and asserting that the Council is not in control;
- The local plan should encourage the use of Local Employment and encouragement for developers to work more closely with local communities when defining and building sites. There should be more information provided on how the District is to act to mitigate the harmful effects of Climate Change using sustainable development methods;
- The Environment Agency has submitted comments in relation to water quality, waste, location of industrial sites and policies CS4, CS8-11;
- An additional policy specifically dealing with the need to ensure adequate specialist accommodation for the elderly is suggested;
- The Cattle market site should be shown on Local Plan as existing Cattle Market and Auction Sale site;
- A clear and flexible telecommunications policy should be included in the plan – suggested text provided by Mono Consultants on behalf of telecoms companies.
- No policies encouraging the provision of or inclusive of a positive strategy towards renewable energy schemes in the District as encouraged in Paragraph 97 of the NPPF (H & B);