



**Harbrough Local Plan 2011-2031
Proposed Submission**

Interim Consultation Statement

Date: September 2017

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1. Purpose of document

1.1 This document sets out how Harborough District Council has involved the community and other interested parties in the preparation of the Local Plan to date. It shows how the Council has complied with Regulation 18 of the Town and Country Planning (Local Development) (England) 2012 Regulations¹ (referred to as ‘2012 Regulations’) and how it has undertaken engagement in accordance with the 2012 Regulations. The Consultation Statement will be finalised to take into account representations on the Proposed Submission Local Plan and will accompany the submission of the Local Plan to the Secretary of State for examination in early 2018.

1.2 A Consultation Statement is required by Regulation 22 (c) of the 2012 Regulations. It must set out:

- Which bodies and persons the Council invited to make representations under Regulation 18;
- How these bodies and persons were invited to make representations under Regulation 18;
- A summary of the main issues raised by the representations made pursuant to Regulation 18;
- How many representations made pursuant to Regulation 18 have been taken into account;
- If representations were made pursuant to Regulation 20, the number of representations made and a summary of the main issues raised in those representations; and
- If no representations were made in Regulation 20, that no such representations were made.

1.3 Public consultation has taken place within the context of para. 155 of the National Planning Policy Framework (NPPF) which states:

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

¹ http://www.legislation.gov.uk/ukxi/2012/767/pdfs/ukxi_20120767_en.pdf

- 1.4 Consultation has also been carried out in accordance with the Council's Statement of Community Involvement. This is covered in more detail in Chapter 3.

2. Summary of consultation undertaken to date

- 2.1 In 2012 the Government published the National Planning Policy Framework (NPPF) which requires local planning authorities, like Harborough, to support 'sustainable development' and to plan positively for it through the preparation of a new Local Plan. Although the Core Strategy was only adopted in November 2011, it soon became out of date because its housing policies did not deliver enough housing to the District's future needs, based on the latest up to date evidence of housing need, whilst not all policies were in general conformity with the NPPF. The decision to prepare a Local Plan based on an updated Core Strategy, including strategic allocations, was taken by the Council in December 2012. This Interim Consultation Statement focuses on two Local Plan consultations, namely the Scoping Consultation and the Options Consultation.
- 2.2 **Local Plan Scoping consultation (March - April 2013):** In accordance with Regulation 18 of the Town and Country Planning (Local Planning) (England) Regulations 2012, the first stage in preparing a new local plan for the District was to consult on the scope of the document. This involved setting out the proposed contents of the new Local Plan and inviting organisations and persons to comment on what the Plan should contain. This 'New Local Plan for Harborough District Scoping Consultation' (hereafter referred to as the Scoping Consultation) was carried out between 18 March and 28 April 2013. The consultation document is available to view on the [Council's website²](#). Further details relating to the consultation, comments received and the Council's response to the representations are available at Section 5.
- 2.3 **Local Plan Options consultation (September - October 2015):** Following an intensive period of evidence gathering to support and inform the preparation of the Local Plan, an options consultation was carried out between 18th September and 30 October 2015. The paper focused on the need to meet the District's future need for homes and jobs, setting out 9 alternative options for locating housing and employment across the District to 2031. It also set out the proposed approach and/or options in relation to other selected policies. Although the regulations do not require consultation at this stage, the Council considered it vital to allow local communities and stakeholders the opportunity to comment on the alternative options. The

² https://www.harborough.gov.uk/directory_record/462/new_local_plan_scoping_consultation

Options Consultation Paper is available to view on the [Council's website](#)³. Further details relating to the consultation, comments received and how the comments informed the preparation of the draft pre-submission Local Plan is available at Section 6.

- 2.4 This Interim Consultation Statement sets out how the Council has sought to engage individuals and organisations in the preparation of the Local Plan to date and how this has helped to shape the plan's strategy and policies. Following the minimum 6 weeks consultation on the Proposed Submission Local Plan, the Statement will be update to reflect the level and nature of representations made prior to submission to the Secretary of State in 2018.

3. Relationship with Statement of Community Involvement

- 3.1 The Statement of Community Involvement (SCI) is a statutory document that sets out to explain how the Council will actively seek to engage all sectors of the community and encourage widespread involvement in the plan making and development management processes. The Council first adopted an SCI (to be made available on web) in July 2006 and the early stages of preparing the Local Plan, including the Scoping Consultation in 2013, were carried out in accordance with its provisions. However, an updated SCI was adopted in March 2015⁴ and this now sets out the standards to be adhered to in involving the local community and organisations.
- 3.2 In relation to the preparation of the Local Plan, the 2015 SCI focuses on the statutory stages and sets that all members of the public, groups and organisations as well as businesses that have expressed an interest in future planning policy in the District will be notified of the consultation and invited to comment through the Council's website.
- 3.3 The Council is required to meet all the minimum requirements for planning consultation as set out in the relevant regulations⁵. The SCI also sets out additional commitments in relation to ensuring effective engagement and makes it clear that a statement will accompany submission of the Local Plan, summarising how community engagement was carried out at each stage of the process.
- 3.4 The Scoping Consultation in 2013 made use of the Council's strategic planning database of interested parties including stakeholders, statutory consultees, organisations and members of the public. An online consultation

³ <https://harborough.jdi-consult.net/ldp/readdoc.php?docid=15>

⁴ http://www.harborough.gov.uk/directory_record/563/statement_of_community_involvement

⁵ <http://www.legislation.gov.uk/uksi/2012/767/regulation/18/made>

tool, known as the Strategic Planning Consultation Portal, was introduced prior to the 2015 Options Consultation. This enables organisations, interested parties and members of the public to register for future consultations and allows online submission of comments. The Consultation Portal means easier access for users in the community, as well as being more cost and resource effective for the Council.

- 3.5 All consultation documents are made available online on the Council's website, at Council Offices, in public libraries and at permanent Parish and Town Council Offices in accordance with the SCI.
- 3.6 The SCI commits the Council to giving Parish Councils and Parish Meetings a period of 4 weeks prior notice of statutory consultations to enable sufficient time for meetings to be arranged to fit in with the consultation timetable.

4. Compliance with Duty to Cooperate

- 4.1 The Duty to Co-operate was created in the Localism Act 2011, and amends the Planning and Compulsory Purchase Act 2004. It places a legal duty on local planning authorities, county councils, and certain public bodies to engage constructively, actively and on an ongoing basis to maximise the effectiveness of Local Plan preparation in the context of strategic cross boundary matters. This is considered further in the Duty to Co-operate Statement. However, proactive dialogue between the Leicester and Leicestershire local planning authorities is a long standing practice. The 7 Leicestershire local authorities, Leicester City Council and Leicestershire County Council have a history of co-operation and joint working to achieve shared aims and produce joint evidence. Accordingly the foundation was laid for the transition into the current duty to co-operate system.
- 4.2 Quarterly meetings take place between all the local planning authorities in the County, a group known as Development Plans Forum (DPF). The aim of DPF is to provide local planning authorities in Leicestershire with a forum that can discuss and advise on implications of planning policy and guidance, help to raise awareness and share best practice on local planning issues. Planning Officers Forum (POF) also meets quarterly and sees senior officers meeting to discuss matters of mutual concern across both plan making and development management.
- 4.3 Whilst the above forums are longstanding, more recently co-operation has taken place on the development of a Strategic Growth Plan (SGP). This involves the 9 local authorities and the Leicester and Leicestershire Enterprise Partnership (LLEP). The process is supported by both a Members' Advisory Group (MAG) to report to individual authorities for decision on all matters

relating to the Plan and a Strategic Planning Group comprising senior offices which oversees technical work, including the commissioning of joint evidence. The Strategic Growth Plan is an overarching plan which will set out the aspirations for delivering growth in Leicester and Leicestershire, including agreeing the scale and direction for future growth to 2050. More information about this process can be found on the dedicated [SPG website](#)⁶.

- 4.4 Consultation and discussion has also been held with Councils beyond the Leicestershire border that may be influenced by or have influence on policies within Harborough District. This has been fed into the evolution of the Local Plan.
- 4.5 A separate statement has been prepared detailing how the Council has fulfilled this requirement and this is available [here](#)⁷

5. Scoping Consultation

- 5.1 The scoping consultation was the first stage in preparing the new Local Plan for Harborough District. Its purpose was to seek the views of interested parties on the proposed contents of the new Local Plan as required by Regulation 18⁸. The views expressed were used to finalise the scope of the Plan and to inform the identification of any further evidence requirements.
- 5.2 As well as setting out the proposed contents of the new Local Plan for the District, views were sought on the following specific policy themes/approaches:
- Housing requirements and distribution across the District;
 - Refreshing the approach to Limits to Development;
 - Phasing of development;
 - Identifying strategic allocations;
 - Market Harborough Strategic Development Area (SDA);
 - Providing for Gypsy, Traveller and Travelling Showpeople Needs – new need targets and the requirement for allocations;
 - Rural economy;
 - Refreshing the approach to Important Open Land;
 - Delivery of development through Neighbourhood Development Plans;
 - Protecting and improving local services and facilities;
 - Delivering development and supporting infrastructure.

⁶ <http://www.llstrategicgrowthplan.org.uk/>

⁷ <https://harborough.jdi-consult.net/ldp/>

⁸ The Town and Country Planning (Local Planning) (England) Regulations 2012

5.3 The scoping consultation took place between 18th March and 28th April 2013, concurrently with consultation on the draft North West Market Harborough Strategic Development Area Master Plan. Both were online consultations, with respondents encouraged to reply via a questionnaire accessed through the Council’s website. A copy of the letter inviting participation in the consultation is set out at Appendix 2. Parish Councils were given one month’s notice of the upcoming consultation (see Appendix 2). The documents were also available for reference in the Council Offices, local libraries across the District (see Appendix 2 copy of notification letter) and permanent Town/Parish Council offices.

5.4 A total of 120 individuals and organisations responded to the scoping consultation. 84 of these responses were made online, with the remainder e-mailed or posted. The breakdown of respondents by category is set out in Table 1 below:

Table 1: Scoping consultation responses by respondent category

Respondent category	Number of responses
Resident/resident group	46
Developer/agent/land owner	38
Parish council	14
Statutory consultee	11
Councillor	6
Neighbouring local authority	4
Neighbouring parish council	1
Grand total	120

5.5 Appendix 3 summarises the responses to each proposed policy approach within the scoping consultation document. For each theme it sets out the number of responses received, the numbers agreeing and the numbers disagreeing with the proposed approach. For each policy approach the report sets out an overall summary of the comments, together with key issues emerging from the responses received.

5.6 Following the consultation, the responses were analysed and proposed responses to the issues raised were presented to the Local Planning Executive Advisory Panel meeting on 3 July 2013. This analysis is set out at Appendix 4.

5.7 Following on from the analysis of responses to the Local Plan Scoping Consultation, it was recommended to the Advisory Panel 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;

- greater flexibility be given to the identification of sites as strategic, dependent upon the nature and scale of each settlement;
- consideration 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;
- 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; and
- 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.

5.8 These recommendations were accompanied by the identification of additional evidence documents needed to support the preparation of the new Local Plan as follows:

- 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 local authorities 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)

5.9 In addition, it identified potential additional evidence requirements result from the scoping consultation responses. The need for these was to be given further consideration and reported upon by officers at a later date:

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

5.10 Potential delays to the Local Plan preparation timetable were also highlighted in the report to the Advisory Panel in July 2013. There was recognition that there would be an inevitable delay to the consultation of a pre-submission draft Local Plan (scheduled for October 2013) for 2 main reasons:

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

6. Local Plan Options Consultation

Overview

6.1 Following completion of the scoping stage and evidence collection, a further stage of public consultation was undertaken. The Local Plan Options Consultation was non-statutory and ran for 6 weeks between 18 September and 30 October 2015.

6.2 The [Options Consultation Paper](#)⁹ set out a 9 options for the distribution of development across the District and alternative approaches to a number of topics themes central to the preparation of the new Local Plan. Comments were invited on the approach or options relating to the following topics:

- Draft Vision and Objectives
- Settlement hierarchy
- Alternative housing and employment distribution options
- Potential housing allocations
- Replacement of limits to development
- Housing in the countryside

⁹ <https://harborough.jdi-consult.net/ldp/readdoc.php?docid=15>

- Affordable housing
- Gypsy and Traveller, and Travelling Showpeople provision
- Protection of existing employment sites/new employment provision
- Bruntingthorpe Proving Ground/Leicester Airport
- Strategic distribution
- Preventing coalescence of settlements
- Proposed Local Green Space
- Potential retail sites/Market Harborough town centre and primary shopping area boundaries
- Infrastructure planning
- Settlement sections

6.3 A number of these topics included alternative options or alternative policy approaches. Again, views were invited on the alternative options presented, together with an invitation for respondents to suggest any further options. The Local Plan Options Consultation and accompanying Interim Sustainability Appraisal is available in the 'Draft & Historic Documents' section of the Portal¹⁰. Representations may be viewed by clicking on the blue magnifying glass icon next to the relevant paragraph or question in the Options paper.

How the Council consulted

6.4 Whilst hard copies of the consultation document were made available in accordance with the Statement of Community Involvement, the consultation was hosted via the newly introduced Strategic Planning Consultation Portal. Consultees were advised to view and make comments via the portal.

6.5 Hard copies of the consultation document were made available to view at:

- The Council Offices (Market Harborough)
- Permanent Town/Parish Council Offices (Lutterworth, Broughton Astley, Great Glen and Fleckney)
- Public libraries (Market Harborough, Lutterworth, Broughton Astley, Kibworth, Fleckney, Great Glen, Evington, mobile)

6.6 In order to facilitate the use of the consultation portal and encourage comments to be made online, assistance and advice for customers was provided by members of the Strategic Planning Team via e-mail, over the telephone and at 4 Local Plan Options consultations surgeries, held at the following locations and dates from 12 noon until 7pm:

- Wednesday 30th September - Council Chamber, The Symington Building (Adam and Eve Street, Market Harborough, LE16 7AG)
- Thursday 1st October - Kibworth Cricket Club (Fleckney Road, Kibworth, LE8 0HG)

¹⁰ <http://harborough.jdi-consult.net/ldp/index.php>

- Wednesday 7th October – Wycliffe Rooms (George Street, Lutterworth, LE17 4ED)
- Wednesday 14th October – Scraptoft Village Hall, (Scraptoft Rise, Scraptoft, LE7 9TF)

6.7 A total of 177 customers attended the 4 consultation surgeries. The majority of attendees were able to speak with a member of the team, often at some length and to receive further explanation of the Options with the aid of an exhibition. Table 2 below shows the number of attendees at each surgery.

Table 2: Local Plan Options consultation surgeries – numbers of attendees

Local Plan Options surgery	Count of attendees
Market Harborough	25
Kibworth	40
Lutterworth	87
Scraptoft	25

Feedback from consultation

6.8 A total of 3969 representations were made by 584 respondents, 66% of which were made via the consultation portal. Table 3 below illustrates the proportions of submission methods used by respondents:

Table 3: Local Plan Options Consultation representations by submission method

Submission method	Number of representations	% of representations
Online consultation portal	2639	66%
Email	625	16%
Letter	705	18%
TOTAL	3969	100%

6.9 Table 4 below provides an overview of the number of respondents and representations to each question within the Local Plan Options document. A number of respondents made more than one representation on specific questions, or parts of questions.

Table 4: Local Plan Options consultation – Numbers of respondents and representations by question

Question	Number of respondents	Number of representations
Q1. Do you have any comments on the draft Vision?	63	67
Q2. Do you have any comments on the draft Objectives?	67	76
Q3. Which Housing and Employment Option(s) do you favour?		
Option 1: Rural	248	274
Option 2: Core Strategy Distribution	218	236
Option 3: Urban	220	238
Option 4: Scraftoft / Thurnby SDA	254	271
Option 5: Kibworth SDA	305	328
Option 6: Lutterworth SDA	248	270
Option 7: Scraftoft / Thurnby SDA and Kibworth SDA	355	371
Option 8: Scraftoft / Thurnby SDA and Lutterworth SDA	279	295
Option 9: Lutterworth SDA and Kibworth SDA	331	351
Q4. Do you have any comments on the proposed criteria-based policy to replace Limits to Development?	72	77
Q5. Which is your preferred Option for Development in the Countryside?		
Option C1: Strictly controlling development in the countryside	31	34
Option C2: Limited infill and Development management led	21	21
Option C3: Meeting locally identified need (with Option c1 above)	16	16
Option C3: Meeting locally identified need (with Option C2 above)	17	17
Q6. Would you like to submit any potential sites to accommodate gypsies and travellers, or travelling showpeople?	8	8
Q7. Do you have any comments on the list of existing employment sites proposed to be retained and protected through policy?	8	8
Q8. We'd like to know which Strategic Distribution Option(s) you favour.		

Question	Number of respondents	Number of representations
Strategic Distribution Option A	85	89
Strategic Distribution Option B	79	84
Strategic Distribution Option C	80	82
Q9. Do you have any comments regarding the proposed policy approach for Bruntingthorpe proving Ground?	15	16
Q10. Do you have any comments regarding the proposed policy approach for Leicester Airport?	14	14
Q11. Which is your preferred option to prevent the coalescence of settlements?		
Option G1: Defining Specific Areas of Separation	36	37
Option G2: Using criteria to prevent coalescence across the District, not just in specific Areas of Separation	26	26
Q12. Do you have any comments on the list of proposed Local Green Space?	31	32
Q13. Do you have any comments on the potential retail sites?	13	13
Q14. Do you have any comments on the suggested Town Centre or Primary Shopping Area Boundary for Market Harborough?	7	7

6.10 A summary of the responses received during the Options Consultation, highlighting the main issues raised, is set out at Appendix 5. After each summary there is a brief response as to how the issue has informed the preparation of the Proposed Submission Local Plan.

7. Local Plan Sustainability Appraisal

Overview of Sustainability Appraisal¹¹

7.1 Sustainability Appraisal (SA) involves the systematic identification and evaluation of the likely economic, social and environmental effects of a plan (and any reasonable alternatives) to inform the development of a more sustainable plan. It is undertaken alongside, and is an important part of, the plan making process.

¹¹ All SA Documents referred to in this section are available at http://www.harborough.gov.uk/directory_record/724/sustainability_appraisal_and_strategic_environmental_assessment_-_new_local_plan

SA Scoping

- 7.2 In 2013 following the Scoping Consultation, the Council engaged consultants AECOM (formerly URS) to undertake the SA of the Local Plan. The first stage in the process was the drafting of a SA Scoping Report which involved the process of gathering information about the area and the factors likely to be affected by the Local Plan and identifying the issues which should be the focus of the SA.
- 7.3 The draft SA Scoping Report was published in May 2014 and sent to the 3 statutory bodies (Environment Agency, Historic England and Natural England). It was also made available for parish councils to make comment. Comments were received from all 3 statutory bodies and 2 parish councils (Billesdon and Burton Overy) and are available on the Council's website. Following consideration of the comments an amended SA Scoping Report was published in October 2014.

SA Assessment of Reasonable Alternatives

- 7.4 The next stage of the SA process involved the identification and assessment of 'reasonable alternatives' to achieve the objectives of the Local Plan. The findings of the SA process in relation to the 9 distribution options were set out in the 'Sustainability Appraisal – Interim Report (September 2015)' which was consulted on at the same time as the Local Plan Options paper. As with the Options, the consultation was done online primarily through the Strategic Planning Consultation Portal and was open to all consultees. Comments received were forwarded to the SA consultants for consideration in producing the final SA report.
- 7.5 The SA Interim Report (September 2015) did not appraise the alternative options for strategic distribution (large warehousing). At the time, it was considered beneficial to gather further evidence to support a sustainability appraisal of strategic distribution. Not least, because strategic distribution tends to draw labour from a large travel to work area straddling counties and regions.
- 7.6 The availability of further information enabled a detailed appraisal of the options for strategic distribution to be undertaken and a second interim SA report. The alternatives appraised comprised the 3 options (A-C) set out in the options document, and 2 further combinations of these individual options. The latter 2 combinations were appraised to support the separate development management function of the council in its consideration of planning applications which were at the time pending determination.
- 7.7 This 'Second Interim SA Report Appraising Options for the Provision of Strategic Distribution Growth (Feb 2016)' considered the likely effects of each

strategic distribution option for Harborough District appraised against the SA Objectives. In addition, it also outlined the broad implications of each option for Leicester and Leicestershire as well as the wider area. The report was again available to view and comment on at the Online Portal from 17th February – 16th March 2016 and copies were made available at the Council Offices, permanent Town/Parish Council offices and local libraries. The 3 statutory bodies were consulted and a press release issued. As part of this consultation respondents were given the opportunity to submit amendments to any comments submitted during the Options Consultation.

7.8 Two further internal SA reports were prepared during 2016 in order to inform emerging Local Plan policies and to ensure that their likely social, environmental and economic effects have been considered, namely:

- Third Interim SA Report (August 2016); and
- Selected Spatial Options (September 2016).

These reports were not consulted on but formed part of the overall Local Plan sustainability appraisal iterative process.

7.9 The Harborough Local Plan Proposed Submission Sustainability Appraisal (August 2017) is published for consultation alongside the Proposed Submission Local Plan. It gives a summary of the effects of Local Plan against the 6 sustainability themes and sets out potential monitoring measures to track significant effects.

8. Next steps

8.1 This Interim Consultation Statement will be updated following the period for representations on the Proposed Submission Local Plan (Reg. 20 consultation). The updated Consultation Statement will set out the number of representations received as part of the Reg. 20 consultation and provide a summary of the main issues raised. It will be submitted to the Secretary of State along with Local Plan for independent examination.

Appendix 1: List of those invited to comment on Scoping Consultation
(March – April 2013)

Specific consultation bodies/duty to cooperate partners/adjoining local authorities

Historic England
Environment Agency
Highways England
Local Highway Authority
Natural England
Homes and Communities Agency
The Coal Authority
Network Rail
Civil Aviation Authority
East Midlands Electricity
Anglian Water
Severn Trent Water Ltd
National Grid
British Gas
Leicestershire County and Rutland PCT
East Midlands Strategic Health Authority
Sport England
Mono Consultants Limited
Mercury Personal Communications Ltd
Orange Personal Communications Ltd
Telecom Securicor Cellular Radio Ltd
Vodafone Limited
BT Radio Group Midlands
Dolphin Telecommunications Ltd
British Telecommunications Plc
One2One Personal Communications

FPL Telecom Ltd
Hutchison 3G UK Limited
A P T
O2 (UK) Limited
Marconi APT
T Mobile UK LTD

Blaby District Council
Charnwood Borough Council
Corby Borough Council
Daventry District Council
Hinckley & Bosworth Borough Council
Kettering Borough Council
Leicester City Council
Leicestershire County Council
Melton Borough Council
Oadby & Wigston Borough Council
Rugby Borough Council
Rutland County Council
Warwickshire County Council
Northamptonshire County Council
West Northants JPU

District Councillors

Councillor Alan Birch
Councillor Amanda Burrell
Councillor Barbara Johnson
Councillor Blake Pain
Councillor Brian Smith
Councillor Alan Birch
Councillor Colin Golding
Councillor Christopher Holyaok
Councillor Charmaine Wood
Councillor David Beaty
Councillor Derek Evans
Councillor Francesca McHugo
Councillor Geraldine Robsinson
Councillor Graham Spendlove-Mason
Councillor Janette Ackerley
Councillor Jo Brodrick
Councillor John Everett
Councillor James Hallam
Councillor Julie Simpson
Councillor Lynne Beesley-Reynolds
Councillor Mark Graves
Councillor Michael Rook
Councillor Neil Bannister
Councillor Neville Hall
Councillor Paul Bremner
Councillor Peter Callis
Councillor Paul Dann
Councillor Phillip king
Councillor Phil Knowles
Councillor Richard Dewes

Councillor Roger Dunton
Councillor Rosita Page
Councillor Richard Tomlin
Councillor Steve Charlish
Councillor Simon Galton
Councillor Sarah Hill
Councillor William Liquorish

Members of Parliament

Edward Garnier, QC MP
Andrew Robathan, MP
Alan Duncan, MP

**Harborough Parish
Council/Meetings**

Allextan Parish
Arnesby Parish
Ashby Magna Parish
Ashby Parva Parish
Billesdon Parish
Bitteswell and Claybrooke Magna
Parish
Blaston
Blaston Parish Meeting
Bringham Drayton and Nevill Holt
Parish
Broughton Astley Parish Council
Bruntingthorpe Parish
Burton Overy Parish
Cathorpe Parish
Cotesbach Parish
Cranoe Parish
Dunton Bassett Parish
East Norton Parish
Fleckney Parish
Foxton Parish
Frisby Parish
Frolesworth Parish
Gaulby Parish
Goadby Parish
Great Bowden Parish
Great Easton Parish
Great Glen Parish
Gumley Parish

Hallaton Parish
Horninghold Parish
Houghton on the Hill Parish
Hungarton Parish
Husbands Bosworth Parish
Illston on the Hill Parish
Keyham Village Meeting
Kibworth Beauchamp Parish
Kibworth Harcourt Parish
Kimcote and Walton Parish
Kings Norton Parish
Leire Parish
Little Stretton Parish
Loddington and Launde Parish
Lubenham Parish
Lutterworth
Lutterworth Town Council
Market Harborough Civic Society
Medbourne Parish
Misterton and Walcote Parish
Mowsley Parish
Newton Harcourt Parish
Noseley Parish
Owston and Newbold Parish
Peatling Magna Parish Meeting
Rolleston Parish
Saddington Parish
Scraptoft Parish
Shawell Parish
Shearsby Parish
Skeffington Parish
Slawston Parish

Smeeton Westerby Parish
South Kilworth Parish
Stonton Wyville Parish
Stoughton Parish
Swinford Parish
Theddingworth Parish
Thurnby and Bushby Parish
Tilton on the Hill Parish
Tugby and Keythorpe Parish
Tur Langton Parish
Ullesthorpe Parish
Welham Parish Meeting
West Langton Parish
Willoughby Waterleys Parish

Adjoining Parish Councils

Cosby Parish Council
Croft Parish Council
Kilby Parish Council
Sapcote Parish Council
Sharnford Parish Council
Stoney Stanton Parish Council
Whetstone Parish Council
Wigston Parva Parish Meeting
Barkby & Barkby Thorpe Parish Council
South Croxton Parish Council
Cottingham Parish Council
East Carlton Parish Council
Gretton Parish Council
Middleton Parish Council
Rockingham Parish Council
East Farndon Parish Council
Great Oxendon Parish Council
Lilbourne Parish Council
Marston Trussell Parish Meeting
Sibbertoft Parish Council
Stanford-on-Avon Parish Meeting
Sulby Parish Meeting
Welford Parish Council
Ashley Parish Council
Braybrooke Parish Council
Dingley Parish Council
Harrington Parish Council
Sutton Bassett Parish Meeting

Weston by Welland Parish Council
Sombery Parish Council
Twyford & Thorpe Satchville Parish Council
Oadby and Wigston Borough Council
Churchover Parish Council
Copston Magna Parish Council
Newton and Biggin Parish Council
Willey Parish Council
Belton-in-Rutland Parish Council
Caldecott Parish Council
Stoke Dry Parish Meeting

Members of the public

Mr A Herbert
Mr A Taylor
Mr J Bayliss
Mr P Johnson
Mr R Jones
Mr S White
Ms A Read
Ms S Clarke
Dr J Osborne
Mrs P A Freeman
Mr W Smith
Mr Stephen Hargreaves
Mr A Pickering
Mr S Sandercock
Mr K Haddon Burditt
Mr I Ferguson
Mr J Weston
Mr T Smith
Ms L Johnson
Mr S Freeman
Mr M Measom
Mr M Norton
Mr P Geldart
Ms B Sabin
Mr & Mrs Ward
Mr P Sangha
Mr O Tebbs
Mr J Fort
Ms L Hutchinson
Mr I Carr

Mr Orton
Mr G Humphreys
Mr Coakley
Ms A Golden
Ms D Nicholls
Mrs B Richards
Mr S Morris
Prof & Mrs D Siveter
Mr G Smith
Mr A Gunne-Jones
Prof A D Wright
Mrs D Sears
Mrs S Tompkins-Bateman
Mr Holliday
Mr B Houghton
Mrs D Walton
Mr R Root
Mr M Allen
Mr B Bosworth
Mrs West
Mr & Mrs Press
Mr J Patterson
Mrs R Johnson
Mr G Oliver
Mrs S Clow
S Hutchinson
Mr D Lane
Mr & Mrs Potter
Dr Eperon
Mr R De Borde Barker
Mrs N Stanley
Mr M Hillson

Mrs H Dilworth
Miss J Dilworth
Mr Byron
Mrs Richards
Mr David Short
Mr D Macnally
Mr E Hynes
Ms J Besbrode
Mr D Clinton-Smith
Mr Woodbridge
Mrs Hampson
Mr M Neale
Mr & Mrs Darby
Mr M Flack
J J Shorley
Mr A Jessop
Mr P Hurst
Mr & Mrs M Green
Mr M Van Oppen
Mr D Pepperill
Mr & Mrs McAlister
Mr P Maxwell
Mrs Jackel
Mr Lichfield
Miss Towers
Mr S Holmes
Mr C Bedford
Mrs Crich
Mrs S E Turner
Mr A Hill
Ms C Pick
Mr P Stephens

Mr R Sloane
Mr D Blythe
Mr P E Chapman
D N Beaumont
Mr N Holroyd
R Woodcock
The Lord Kimball
Mr C O'Sullivan
Mr M Hilson
Mr Parker
Mrs Faulkner
Mr G D Hampson
R. Facer
Mr B J Ashton
Mr A Horton
Mr & Mrs W E Sunderland
Mr H Johnson
Mr A Faulkner
Mr P Urmston
Mr F Knight
G Pridmore
A. Zalaikalns
P. Lee
G & D Shirley
Mr S Thompson
A Buisley
Ms J Burbage
S J Crowe
Mrs V Sechi
Mr W C Collin
Mr S Redfern
Mr D mason

Ms A Taylor
Mrs J Oldham
Mr McLutiv
Mrs A Brookes
T R J Moffatt
Mr B Kearvell-White
Mrs L Buckingham
Mrs A Collinson
Mr & Mrs Breslin
Mr H Evans
Mr D Bletsoe Brown
Mr R Beeby
Ms S Beaumont
Ms N Faithfull
Mr P Perkins
Ms A Ziebis
Mrs S M Ellingworth
Mrs D Everard
Mr J Hammond
Mr Frosdick
Mr D Percival
J M Thompson
Mr & Mrs S Ford
Mr D Curtis
Mr B Waive
Ms S Garbutt
Mr A Clark
Mr C S M Mitchell
Mr D Ball
Mr E Martin
Mr P Knott
Mr C Twigg

Mr R Vaja
Mrs P Waive
Ms A Turner
Mr J Wicks
Mr J R Martin
Mr N Jackson
Mr R E Gibson
Dr W D Cunningham
Mr & Mrs R Townsend
J Oliveti
C J & J E Nichols
Mr M Graves
J & A Spencer
Mrs B Marlow
Mr E Coveney
Mr R Bettles
Ms J Franklin
Mr C Frankiln
Ms J Toane
Mr S Hargreaves
Mr & Mrs Kimberley
Mr T Gent
S Voce
V I George
D Mills
M Mills
J Autersen
M F Madley
Miss S J Leeson
C Brown
A Allen
Mr I Bowler

R Edgson
C Pick
A TorenJ Pallerson
Ms S Loowe
Mr & Mrs Gerhans
Mr & Mrs P Iafford
Mr & Mrs K Maud
Mr & Mrs K Janeba
Mr P Wright
K Alen
Ms S Hannigan
Ms A Harvey
Ms C Birch
Mr D Birch
Mr R Mount
Mr P Knowils
A S Francis
P & M Silverman
Mr B Clumboln
Mr & Mrs S G Abbott
Mr M Alders
Mr & Mrs J Almey
Mrs M Andrews
Mr & Mrs Appleton
G A Arnold
I H & P Asprey
G M Bailey
Mr & Mrs G Ball
Mr R Bangerter
R M & M Banks
Ms K Barker
Mr & Mrs Beaumont

Mr C R Bench
Mr A K Bennett
A & J Betts
H T Bindley
J & C Brady
J & D Brooks
Mr & Mrs J Brookes
Mr M Brown
Mr S Brookes
Mr & Mrs K Brown
Mr D Brunton
Ms R Brunton
Mr T Brunton
Ms K Burnell
R H Tattersall
Mrs C Taylor
Miss C M Taylor
Mr A Tester
Mr & Mrs Thompson
Ms A Thorp
L Tobin
P B Neal & J A Tuffs
Mrs E Van Aken
Mr J Vanderliet-Awick
Mr M Vybiral
Mrs L Venable
Mrs T Wagstaffe
Ms S Walkerdine
Mr & Mrs Warden
Mr R Webb
Mr & Mrs S Webb
I C Wells

Mr S Weselby
Mr B White
Mrs J White
Mr R White
Mr R Wilcock
Mr & Mrs Wilford
Ms N Williams
Mrs G Williams
Mr P Williamson
Mr & Mrs Willis
V & A Window
N A M Woodbridge
Mr A Wright
Mrs M Wright
Mr & Mrs I Wykes
W L York
Mr J A Yell
Mr N Young
Mr C Raymakers
Mrs J Raymakers
Mrs K Reeve
Mr J Richards
Ms M Richardson
S & C Richardson
Mr R Ridgway
Mrs C Roberts
Mr & Mrs S Robinson
Mr & Mrs J Rowley
Mr T Ryan
Mr & Mrs J Sandy
Mr A Sankey
Mrs L Lillie

Mrs G Siddons
Mr J Siddons
Mr & Mrs R Skene
K A Smith
N Slough
V Gardner
H J & A T Smart
Mr B Smith
Mrs Smith
Miss Short
Miss D L Soanes
M W Somerton
Ms J Spikings
Mr N Spikings
Mr D Staff
Mr D Stewart
Mrs H Stone
Mr & Mrs G Stretton
Mr & Mrs J Sturgess
M Summer
J P Swain
Mr S Naylor
Mr K Nichols
Mr & Mrs Nunn
Mr P Oldfield
Mr & Mrs K O'Neill
Mrs L Osbourne
J & A Overs
Mr Painton
Mr T Palmer
E Patrick
T H Patrick

Mr & Mrs T Pemberton
Mr & Mrs C Powell
Mr C Preston
Miss C Douglas
Mr T R Price
Dr R Quinn
Mr D Macnally
Mr & Mrs Maddox
Mr M Major
Mr R Maris
Mrs G M Mark
A Marlow
Mr S Marsh
Mr E Marshall
Mr S Marshall
Mr D Mason
Mr J Masters
Mr & Mrs N Matthews
Mr R Maxfield
Mr & Mrs P McArragher
J McVeigh
Mr & Mrs J Meredith
A & G Mitchell
Mr C Mitchell
Mrs D Mitchell
Mr D V M Mitchell
Mrs S E Moffatt
K & A Morley
D Morte
Dr P Mounfield
Mr I Jackson
Mrs J Johnston

Mrs M Jones
Mr K N Jones
Miss J R Taylor
Mr S Jones
Mrs P Kay
Mr & Mrs Kelsey
Mr & Mrs D Kemp
Mr T King
Mr & Mrs P B Kirby
Mr & Mrs D Kyle
Mr & Mrs A Lane
Mr P Leigh
Ms B Leyland
Mr & Mrs K Ling
Mr N List
C Robinson
F Littlewood
B Lloyd
Mr R M Lloyd
Mrs Lowe
J Galloway
Mr M Garcia
C Garner
Mr R Garratt
Mr R Gibbins
Mrs J A C Gibbons
Mrs R Brosenbauer
Mr & Mrs Gledhill
Mr D Goddard
Mr C Golding
J Goodacre
Mrs G Goodman

Mrs S Goodman
Mr P N Grady
Ms J Granger
Mr & Mrs G Grant
Mr A Green
Mr J Greville-Heygate
Mr P W Gurney
Mrs D Gurr
C F Hadfield
Mr K. Hamill
Mrs R Hamill
Mr & Mrs T Hammond
M R Hankins
Ms C Harris
Mr & Mrs A Harrison
Mr & Mrs S Harvey
Mr K Harvey
Mr & Mrs P Hawkins
D P Hecks
G K Heighton
Mr N Heptonstall
Mrs R Herbert
Mrs J Van Herrewege
Mr P Van Herrewege
Mr A Hesketh
Mrs J Higginson
B C Hillas
Ms N Hillas
Mr R I Holland
Mrs P Holland
Mr K Holman
Mr T Hubbard

Mr P J Hurr
Mr & Mrs R Heald
Mr & Mrs A M Rodgers
Ms A Eaves
Ms Z Eisher
Mr & Mrs E C Eldridge
Ms B Everard
Ms C Ford
W M Foster
Mrs J Murphy
Mr & Mrs M Freer
A Fuller
Mr P Cain
Mrs L M Caldwell
Mr M Castleman
Mrs S Cheeney
Mr & Mrs T Cherry
Mr M Clarke
Ms J Clarke
Ms R Friend
Miss A Cleaver
Mr M Clements
Mr B Cockbill
Mr R G Coles
Mr K Colmer
P Cotterill
Mr & Mrs J M Cotton
Mr J N Cotton
Miss S Craythorne
Mr S Cross
Mr P Crowe
R Croxtall

Ms H Cundiek
Mr S D Dainton
G W R Darker
Mrs A Davies
Mr J Davies
T Butler
Mr & Mrs Davis
Mr C Davis
Dr C Deehan
Mr & Mrs M Devine
D E Ginns
Dr S Dudley
A W & J Dyer
Mr P Hadfield
S Tandy
P & J Cousins
J Clarke
Mrs J Freer
Mr E Lancini
Mr O Lenton
Mr D Kemp
J Gray
Mr H Brown
Mr G Jones
Prof P Demetriades
Mrs Wellar
Mr & Mrs J Hudson
Mr M Carter
Mr S Abbott
Mr P Gray
Mr B Johnson
Mr B Allinson

Ms M B Allinson
Mr & Mrs Gilbert
Mrs G Johnson
Mr M Taylor
Mr Cooper-Hayes
Mr N Johnson
A McHugh
Mr Ellingworth
Mr M Taylor
Mr M J Lord
Mr E Kirk
Mr J Smith
J E Hunt
Mr T Bale
E J Audley
J Shield
P Mulkerrin
P Preston
P R Taylor
W Shardlow
A Staff
E Manley
J Burnell
J Lawton
M Baker
C Evans
C Bellamy
M Jones
M Thornton
P Hart
E Mears
A Henhurst

Mrs J M Driver
T & E Brett
A Worrall
S D Mott
L Beley
J Evans
M Culley
L Humphrey
L Trevorrow
Mr & Mrs Banibal
P Fairly
J & K Carpenter
R & J Balme
T J Blades
J Foulds
C & M Simm
N Ransome
Mrs C Merchant
Mr G Surtees
Mr G Dickerson
N & P Aystead
Ms J Wells
Ms E Tennant
Mr P Holt
Ms V Smith
Ms J Appleton
Ms K Deane
J & A Liddle
Ms J Norcott
Mr P Corderoy
Ms K Colley
Mr J Swann

S Kudryk
Mr & Mrs T Hefford
Ms L Philo
Ms J McVeigh
T Moffatt
Ms S Sutton
P H Radcliffe
Mrs S A Leslie-Miller
Mr P Williams
Mr E Pridding
Ms D Holmes
Mr S Bentley
Mr P G Penter
Mr J Wilson
Mrs M Beale
Mrs L Goodall
R A Hazelton
Mr G Ramsey
Mrs Janet Ramsey
Mrs M Beak
Mr R Taylor
Ms A Aldridge
Ms J Aldridge
D & J Leonard
Mrs J Gibson
J Measures
N Measures
Mr D Snell
T & J Johnson
D Court
Mr & Mrs Clements
Mrs J Lord

J R & J E Branson
J Heckney
Ms F Cheshire
Mr W Richmond
Mrs J M Thompson
Mrs J Smith
Mr S J & Mrs B Haines
Ms M Campton
V O Carter
J M Smith
Mr M Webb
R W Pick
A C Hollingworth
Mrs Beverley Brown
Miss P M Cotton
Mrs J Tooley
S Bailey
Mr J Tylers
Mrs J Tylers
Mr & Mrs J Smith
Ms N Herbert
Miss Dunn
Ms J Migdal
Mr R Migdal
Ms J Batson
Mr E Batson
Mrs L Aston
Ms N G Shardlow
Mr A Hastings
Mr M Wiselka
Mrs G Wiselka
Ms M Herbert

Mr R Herbert
Mrs J Portch
Mr P E Portch
Mrs A Richmond
K D L Richmond
Mrs F I Hopwood
Mr & Mrs Adrian Pierson
Mr H Gregory
Dr R M Gregory
Mrs M Thomsett
Mr G N Greaves
Mrs J Greaves
Mrs S Voce
Mr B Voce
Mrs V Elliott
Mr R Webste
Ms G Bannister
Miss J Dunkley
S Olivant
Mrs J Freer
Mr M Wainwright
Mr M Irons
J Sparrow
Ms C Darch
Mr J Hooley
Lord Cromwell
Dr R Davison
Mr T Bailey
Mr P Humphrey
Mr T Harrison
Mr A Ovens
Mr & Mrs J Nicholls

Mr P Lutman
Mr & Mrs K Spurr
P & O Murphy
M & N Staples
Ms M Murphy
Mr & Mrs P Tester
Mr R Puxley
Mr & Mrs Boxall
Mrs H Trotter
Mr F Bend
Mr M Maddox
Mr & Mrs J Briers
Mr G Perkins
Mr D Morris
Dr J Osborne
Mr J L Marlow
A Lucas
Mrs G Hill
Mr G Hill
Mr T Smith
Mr R Mitchell
Mrs P Hays
Mrs A Snell
Mr N Myer
Mr A Keshwara
Mrs E Smith
Mr J Blenkin
Mr T Hardy
Mr D Higham

Developers/agents/housing associations/solicitors

Adams Holmes Associates
Alpha Land & Planning
Andrew Granger & Co
Andrew Twigg Associates
Aragon Land and Planning
Banner Homes Ltd
Barratt East Midlands
Barton Willmore
Bellway Homes
Bidwell Property Consultants
Bletsoes
Bovis Homes Limited
Brian Barber Associates
Brian Dearlove Partnership
British Gas Properties
British Waterways
Bryant Homes East Midlands
Burdette Cleaver Partnership
Bybrook Developments Ltd
C T Planning
C.Norman Astill And Sons Solicitors
Captia Symonds
Carter Jonas
Castle Bar Properties Ltd
Chris Akrill Town Planning Services
City & Regional Property Consultants
Clarke Homes Ltd
Clarke Properties Ltd
Compass Group

Connell Estate Agent
Cooperative Group Properties
Cushman & Wakefield
CWS Agriculture
Darian Homes
Davenport Consultancy
David Lock Associates
David Scotton Partnership
David Wilson Homes
De Montfort Housing Society Ltd
Derek Lovejoy Birmingham Limited
Derwent Living
Design Services Ltd
Development Land Planning Consultants Ltd
Diocesan Board of Finance
DLA Town Planning Ltd
DLP Consultants Ltd
DPDS Consulting Group
Drivers Jonas
DTZ Piedad Consulting
E.A.Lane And Sons
East Midlands Housing Group
Eddisons Commercial
Entec
Faber Maunsell
Fairclough Homes
FAW Architects
First Strata Planning
Fisher German
Focus
Fox Bennet & Hackney

Framptons
Freethcartwright LLP
Fusion Online Ltd
Gazeley UK Ltd
George Burton ARCHITECTURE AND ECOLOGY Ltd
Gladman Developments
Godfrey-Payton
Goldsmiths
Gordon Smith Associates
Gough Planning Services
Gridcom (UK) Ltd
GVA Grimley
H W Coates Ltd
Halcrow Group Ltd
Hall And Martin A.R.I.C.S.
Hallam Land Management
Harris Lamb
Harvey Ingram Owston Solicitors
Hawkins And Harrison
Hazelton Homes
Heaton Planning
Henderson Scott Architects
Hepher Dixon Town Planning Consultants
HM Prison Service
House Builders Federation
Husbands Bosworth Properties Ltd
Indigo Planning
Jackson-Stops and Staff
James Bailey Planning
James Barr Consultants

Jelson Ltd
JF Associates
John Martin Associates
JWA Architects Ltd
Kent Jones & Done
King West
Lafarge Aggregates Ltd
Lambert Smith Hampton
Landmark Planning
Leicester Housing Association Ltd
Lovell Johns
Marrons Solicitors
Martyn Jones & Associates
Marwalk Development Ltd
Mason Richards Planning
Mather Jamie Ltd
McLean Homes
Mendwest Traditional Homes Ltd
Merton College Oxford
Miller Homes
Ministry of Defence
Nathaniel Litchfield & partners
Npower Renewables
Paragon Planning Ltd
Pegasus Planning Group
Radleigh Homes
Readings Hope And Mann
Riverside Housing Association
Robert Doughty Consultancy Limited
Roger Tym & Partners
Roythorne And Co, Solicitors
RPS Chapman

RPS Planning
Rushton and Lloyd Solicitors
Rutland Country Homes Ltd
S Bloor (Measham) Ltd
Savills
Seven Locks Housing Association
Shoosmith Solicitors
Smith Gore
Smith Stuart Reynolds
Spawforths
Spencers Bairstow Eves
Spencers New Homes and land
St Marys Developments Market
Harborough Ltd
Stamford Homes Ltd
Star Planning And Development
Stephen George & partners
Stoneleigh Planning
Sustainable Ecological Architecture Ltd
Swift Valley Partnership
Sworders
The Art of Building Ltd
The British Wind Energy Association
The Planning Bureau Limited
The Planning Bureau Ltd
The Powell and Welch Almhouse
Charity
The Robert Doughty Consultancy
Travis Homes
Turley Associates
Ward And Price
Waterloo Housing Group

Websters Chartered Surveyors
Wells McFarlane
Westleigh Developments Ltd
Wheatcroft & Son
Wigan Holdings Ltd
Wilcon Homes
William Davis Ltd
Wimpey Homes Holdings
Wood Frampton
WYG Planning & Design

**General consultation bodies/
interested parties**

Age Concern
Age Concern Lutterworth and District
Airport Operators Association
Arnesby Heritage
Arriva Fox County
Billesdon Parish Plan Steering Group
Bitteswell Parish Plan Group
British Geological Survey
British Horse Society
British Wind Energy Association
Brockhall Village Ltd
Broughton Astley Heritage Society
CAMRA
Canal and River Trust
CASCET - Campaign Against the
Stoughton Co-op Expansion Threat
CBI
Centre for Ecology and Hydrology
Churches Together In Harborough
Citizens Advice Bureau
Civic Society of Market Harborough
Civil Aviation Authority
Commission For Racial Equality
Cotesbach Parish Plan Group
CPRE
DEFRA
Department for Transport
Derbyshire Gypsy Liaison Group
Diocese of Leicester

Disability Rights Commission
East Leicestershire Rural Transport
Partnership
East Midlands Councils
East Midlands Electricity
East Midlands Museums, Libraries And
Archives Council
East Midlands Planning Aid
East Midlands Region Local
Government Association
East Midlands Regional Assembly
East Midlands Trains
Enable Youth
Equal Opportunities Commission
Fields in Trust
Fleckney Parish Plan Group
Forestry Commission
Foxton Inclined Plane Trust
Foxton Society
Friends of the Earth
Gartree Village Appraisal Group
Great Bowden Heritage and
Archaeology
Gridcom (UK) Ltd
Gujarat Hindu Association
Hallaton Conservation Society
Hallaton Parish Plan Group
Harborough Access Group
Harborough Community Safety
Partnership
Harborough District Enterprise
Harborough Improvement Team

Hardys and Hansons PLC
Health & Safety Executive
Help The Aged
Husbands Bosworth Doctors Surgery
Inter Faith Forum for Leicestershire
J And W Investments Limited
Kibworth parish Plan Group
Landmark Planning
Learning and Skills Council
Leicester & Leicestershire Racial
Equality Council
Leicester Shire Promotions
Leicestershire and Rutland Playing
Field Association
Leicestershire and Rutland Society of
Architects
Leicestershire and Rutland Wildlife
Trust
Leicestershire and Rutland Women's
Institute
Leicestershire Chamber of Commerce
Leicestershire Constabulary
Architectural Liaison
Leicestershire Fire and Rescue
Service
Leicestershire Gypsy Council Liaison
Group
Leicestershire Police
Leicestershire TEC
Leire Parish Plan Group
Little Bowden Society

Lutterworth and Broughton Astley
Volunteer Centre
Lutterworth Business Rotary
Lutterworth Federation of Small
Businesses
Lutterworth Golf Club
Lutterworth Improvement Partnership
Market Harborough and The Bowdens
Charity
Market Harborough Chamber of Trade
and Commerce
Market Harborough District Hospital
Market Harborough Local Policing Unit
Market Harborough Rugby Union
Football Club
Mowsley Parish Plan Group
National Air Traffic Services Ltd
National Farmers Union
National Transcommunications Ltd
National Trust
National Trust East Midlands
North Kilworth Millennium Green Trust
North Kilworth Parish Plan Group
Northamptonshire Police
Old Union Canals Society
Prospect Leicestershire
Radio Communications Agency
Royal Mail Group
RSPB
Rural Community Council
South Leicestershire CVS

South Leicestershire Riding
Establishment
South Leicestershire U3A
South Leicestershire Voluntary Sector
Forum
Stoughton Parish Plan Group
The Gypsy Council
The Ramblers Association
The Robert Smyth School
The Showmen's Guild of Great Britain
The Theatres Trust
The Tyler Parks Partnership
The Welland Valley Vintage Traction
Club
The Woodland Trust
Thurnby and Bushby Society
Transition Harborough
Traveller Education Service
Traveller Law Reform Project
Union Wharf Narrowboats Ltd
Urban Rhythm Ltd
URS Consultancy
Vision Four Developments Ltd
W. E. Hewitt and Son Limited
Warwickshire Constabulary
Welford Action Group
Wood Coaches Ltd
Woodland Trust - East Midlands
Worldwide Industry Ltd

Appendix 2: Scoping Consultation Notification Correspondence

To: All Consultees and Interested Parties

Please ask for: Strategic Planning Team

Customer Services: 01858 828282

Email: planningpolicy@harborough.gov.uk

Date: 15th March 2013

Dear Sir/Madam

Harborough District – New Local Plan – Scoping Consultation

I am writing to advise you of the launch of a new consultation by the Strategic Planning Team at Harborough District Council. The consultation begins on **Monday 18th March 2013** and runs until **Sunday 28th April 2013**.

The purpose of the consultation is to seek your views on the scope of the new Local Plan for Harborough District. The new Local Plan will review the Harborough Core Strategy (adopted in November 2011) and will also identify key areas of land for development. Once adopted, the new Local Plan will include a number of policies to deliver the homes, jobs and other development needed in Harborough District until 2031. It will also identify those areas which are unsuitable for development, because of their environmental significance.

To respond to the consultation please use our online questionnaire, which will be available on the Harborough District Council website at www.harborough.gov.uk/consultation from 18th March 2013.

You are strongly advised to create an account on the website in order to:

- Save your comments and to return and edit throughout the consultation period before submitting them;
- Receive notification via email about future stages in the preparation of the new Local Plan by selecting “planning” in the favourite topics list. Email is now our preferred method of communication.

To create an account go to www.harborough.gov.uk/register and follow the on-screen instructions.

Publicly available computers to access the online questionnaire are located at the Council Offices (Millers House, Roman Way, Market Harborough) and at each of the public libraries in Harborough District during normal opening hours. A paper copy of the consultation questionnaire will also be available in these venues.

Should you have any queries on the consultation or if you wish to opt out of future Local Plan notifications, please contact the Strategic Planning team at planningpolicy@harborough.gov.uk or on 01858 828282.

Yours faithfully,
Stephen Pointer
Strategic Planning and Housing Manager

Letter/email giving Harborough Parish Councils one month's notice of upcoming LP Scoping Consultation:

Monday, 18th February 2013.

Dear Sir / Madam,

I am writing to inform your Parish Council / Meeting of two forthcoming public consultations on planning issues.

We plan to run a public consultation on 'Scoping the New Local Plan' from Monday 18th March 2013 to Sunday 28th April 2013 (subject to Councillor approval). As you may already be aware the Council needs to review its current planning policy to ensure compliance with the National Planning Policy Framework (the Framework). The purpose of the scoping consultation is to outline which policies need to be reviewed and to seek views on the proposed new policy approaches. From 18th March 2013 the consultation document can viewed at www.harborough.gov.uk/newlocalplan. Representations can be submitted on the Council's website. For those without internet access there will be a hard reference copy for inspection at each library across the District and also at the Council Offices in Customer Services (Millers House, Roman Way, Market Harborough, LE16 7PQ); with comment forms for feedback if needed. I will write to inform you, should the dates of the consultation change.

In addition, we are running a public consultation on the North West Market Harborough Strategic Development Area Master Plan during the same dates (from Monday 18th March 2013 to Sunday 28th April 2013). Copies will be available online (www.harborough.gov.uk/strategicdevelopmentarea) and representations can be made online. As part of the consultation process there will be a public exhibition dedicated solely to the SDA Master Plan, manned by Council Officers and the planners who helped to prepare the Master Plan. This will be held at the Three Swans Hotel in Market Harborough on Wed 20th, Thurs 21st and Fri 22nd March – 10am to 8pm and Saturday 23rd March – 10am to 2pm. A hard reference copy will be available for inspection in each library across the District and also at the Council Offices in Customer Services (Millers House, Roman Way, Market Harborough, LE16 7PQ); with comment forms to submit feedback.

If you have questions please contact the Strategic Planning team on 01858 828282 or email planningpolicy@harborough.gov.uk.

Regards,

Stephen Pointer

Strategic Planning Service Manager



To: Customer Services and Libraries
(Market Harborough, Lutterworth,
Broughton Astley, Kibworth, Great Glen,
Evington, mobile)

Please ask for: Strategic Planning Team

Customer Services: 01858 828282

Email:
planningpolicy@harborough.gov.uk

Date: 15th March 2013

Dear Sir/Madam

Harborough District – New Local Plan – Scoping Consultation

*I am writing to advise you of the launch of a new consultation by the Strategic Planning Team at Harborough District Council. The consultation begins on **Monday 18th March 2013 and runs until Sunday 28th April 2013. I would be grateful if you would make available the enclosed paper copy of the consultation document and questionnaire for customers.***

The purpose of the consultation is to seek views on the scope of the new Local Plan for Harborough District. The new Local Plan will review the Harborough Core Strategy (adopted in November 2011) and will also identify key areas of land for development. Once adopted, the new Local Plan will include a number of policies to deliver the homes, jobs and other development needed in Harborough District until 2031. It will also identify those areas which are unsuitable for development, because of their environmental significance.

To respond to the consultation customers are invited to use our online questionnaire, which will be available on the Harborough District Council website at www.harborough.gov.uk/consultation from 18th March 2013.

Should you have any queries on the consultation, please contact the Strategic Planning team at planningpolicy@harborough.gov.uk or on 01858 828282.

Yours faithfully,

Stephen Pointer Strategic Planning and Housing Manager

Appendix 3: Scoping Consultation Summary of Representations

- A3.1 Housing requirements and distribution across the District;
- A3.2 Refreshing the approach to Limits to Development;
- A3.3 Phasing of development;
- A3.4 Identifying strategic allocations;
- A3.5 Market Harborough Strategic Development Area (SDA);
- A3.6 Providing for Gypsy, Traveller and Travelling Showpeople Needs – new need targets and the requirement for allocations;
- A3.7 Rural economy;
- A3.8 Refreshing the approach to Important Open Land;
- A3.9 Delivery of development through Neighbourhood Development Plans;
- A3.10 Protecting and improving local services and facilities;
- A3.11 Delivering development and supporting infrastructure; and
- A3.12 General comments on Scoping Paper

A3.1 Housing requirements and distribution across the District

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).

A3.2 Refreshing the Approach to Limits to Development

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’;

A3.3 Phasing of Development

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.
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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.

A3.4 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 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.

A3.5 Market Harbourough Strategic Development Area

Policy CS 13: Market Harbourough	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 Harbourough 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.

A3.6 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.
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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'.

A3.7 Rural Economy

Policies CS7: Enabling Employment and Business Development 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 are 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.

A3.8 Refreshing the approach to Important Open Land

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.

A3.9 Delivering development through Neighbourhood Plans

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.

A3.10 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
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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.

A3.11 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.
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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.

A3.12 General 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);

Appendix 4: New Local Plan for Harborough District - Implications of Scoping Consultation Responses

Table A4.1: Scoping Consultation – Summary of responses and implications

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 regarding the economic assumptions underpinning</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 the next columns. Further recommendations 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) 4. Discussion and agreement under the 	<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 timetable of 6 -9 months suggested,

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
	<p>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>relation to the proposed approach to phasing and Neighbourhood Development Plans are set out in subsequent sections below.</p>	<p>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>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>

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
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 advice, which will inform the preparation of the final</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>

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
		<p>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>		
Phasing of Development (Policy CS2: Delivering New Housing)				
This policy will be amended to incorporate a phasing element to ensure	Opinion on this question was split across all respondent groups. Whilst	It is recommended that internal phasing of the delivery of strategic sites	<ol style="list-style-type: none"> 1. Bi-annual housing land supply monitoring. 2. Annually updated 	<ol style="list-style-type: none"> 1. Monitoring position to end April 2013 recently published.

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
<p>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>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>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 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</p>	<p>Harborough Strategic Housing Land Availability Assessment (SHLAA)</p>	<p>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.</p>

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
		year supply of deliverable housing land is maintained, in line with the requirements of the Framework.		
Identifying Strategic Allocations (Policies for Places: CS13-CS17)				
<p>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.</p>	<p>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</p>	<p>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 and in light of evidence relating to the range, scale and mix of suitable deliverable sites identified for each settlement through the SHLAA Update.</p>	<p>1. Annually updated Harborough Strategic Housing Land Availability Assessment (SHLAA)</p>	<p>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.</p>

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
	need to maintain a 5 year housing supply was also advised.			
Market Harborough Strategic Development Area (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.	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	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 Harborough as the most sustainable settlement in the District will have to 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	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 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.	1. It is expected that the Master Plan will be completed by September 2013.

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
	considered outside the remit of a Neighbourhood Plan.	<p>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 part of the SDA within the parish, including defining the Separation Area.</p>		
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	The majority of respondents to this question agreed with the approach set out and recognised the need to plan for the needs of the	No significant amendment to the proposed policy approach is recommended. General agreement to proposed	<ol style="list-style-type: none"> 1. Leicestershire, Leicester and Rutland Gypsy and Traveller Accommodation Assessment (GTAA) 2. Annually updated 	<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

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
locations for 6-10 years and where possible 11-15 years.	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.	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.	Harborough Strategic Housing Land Availability Assessment (SHLAA) to include any potential new gypsy and traveller sites.	undertaken in-house by officers in the Strategic Planning team and due to be completed by end July.
Rural Economy (Policies CS7: Enabling Employment and Business Development , 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 strategic allocation for Magna Park, Lutterworth and Bruntingthorpe Proving Ground in view of their significance and location within the countryside will be set out	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	General agreement to approach. No significant amendment to the proposed policy scope is recommended. Comments will inform detailed policy preparation. Responses highlight the need to explain why specific policy elements for Magna Park (MP) and	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	1. Likely available late summer 2013. 2. In progress, scope of work not yet clarified. Study unlikely to be available before Nov/Dec 2014.

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
in CS17.	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.	<p>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 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.</p>	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.	
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-	The majority of respondents to the question were in support of the approach to important open land. The opinion of residents is split	In view of general support for proposed approach, no significant amendment to the proposed policy approach is recommended.	1. Sites submitted by Parish Councils to HDC to consider allocating as Local Green Spaces are currently being	1. The assessment of potential LGS sites submitted is currently being undertaken by the Neighbourhood and Local Greenspace

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
<p>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.</p>	<p>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 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.</p>	<p>However, further clarity will be needed within the policy and supporting text to explain the role and differences between the main 'green' policy tools.</p>	<p>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 submitted.</p>	<p>Officer and due to be completed by October 2013.</p>
<p>New Policy: Delivery of Development through Neighbourhood Development Plans</p>				
<p>This new policy will explain the complementary relationship between the</p>	<p>There was much support expressed for the approach to development through Neighbourhood</p>	<p>There is no significant proposed amendment to the policy, given the broad support received</p>	<p>Advice will continue to be given to Parish Council and NDP groups</p>	<p>None</p>

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
new Local Plan and future Neighbourhood Development Plans.	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 NDPs.	<p>through the scoping consultation.</p> <p>It is important that clear advice continues to be given to Parishes and others concerning the 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>concerning preparation of NDPs. The advice will be reviewed and updated as new policy and best practice emerge.</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				
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	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	The level of support shown for the aims of this new policy reflect the importance local communities attach to local services and facilities.	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	1. Scope and therefore timetable of the Settlement Capacity work not yet clarified.

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
positively for the provision of community services and facilities, including broadband and facilities for burial and cremation.	improvement of services would come from.	It is recommended that a comprehensive policy relating to protecting and 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.	work and associated consultation with communities.	
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	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	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	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	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.

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
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.	was highlighted. Viability was also raised as a key consideration during the preparation of future policy.	estimates. Viability is an 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.	submitted development option	
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 environment be considered; 		<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 any CIL or changes to Section 106 requirements</p>	Possible need to update the Harborough District Affordable Housing Viability Assessment (2009).	Scope and timetable implications of any future possible update of the Viability Assessment are unknown at this stage.

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
<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 being carried forward into the new Local Plan; 		<p>within the District.</p> <p>Consideration will be given to the inclusion of the additional policies suggested as the plan is prepared.</p>		

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
<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 				

Appendix 5: Options Consultation Summary of Representations (excluding comments on Strategic Distribution)

- A5.1 Vision and Objectives
- A5.2 Sustainable Settlements
- A5.3 Housing and Employment Options
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A5.1 Vision and Objectives

Summary of Responses to the Draft Vision (Respondent ID in brackets where appropriate)

These proposed amendments to the draft Vision and Objectives (as set out in the Options Consultation) are as presented to the Local Plan Executive Advisory Panel on 13 April 2016. The Vision and Objectives have since been refined further

Specific Issues raised	Response	Suggested Action
Primacy of Market Harborough as an historic centre is not reflected. Market Harborough and Lutterworth are very different. (4305)	Agreed. The District's two market towns, although both historic, are significantly different and this should be reflected in the vision.	Amend vision at paragraph 4 to distinguish between the two settlements.
Role of Sustainable Rural Villages (SRVs) should be specifically referenced. Proportionate development in sustainable villages will be appropriate to meet the diverse needs of the District. (5521, 4454, 5433, 5160, 5160, 4740).	Agreed. The vision should make reference to the role of SRVs.	Amend to include sentence on SRVs at paragraph 4.
No reference to Magna Park despite options for expansion. (5519)	Agreed. The vision should make reference to strategic distribution, although not specifically to Magna Park, since there may be other options emerging.	Amend to insert new paragraph (after existing paragraph 5) referencing the role of strategic distribution..
The emphasis on providing for local needs risks not catering appropriately for all facets of market and affordable housing, particularly in rural areas. Greater emphasis should be placed on the need to provide new housing both on a strategic and local level. The provision of new housing should be given greater emphasis to reflect NPPF. '...A significant amount of new housing will have been provided reflecting strategic requirements and local needs and, in terms of type, size and tenure, greater equality of access to suitable accommodation will have been promoted. Older people...' (4944, 3755,	Local need is used to mean 'objectively assessed need', as well as a local mix. Objectively assessed housing need for the HMA and for each L& L local authority area was set out in the Strategic Housing Market Assessment (2014), and will be updated through the 2016 Housing and Economic Development Needs Assessment (HEDNA). It is for the plan to translate this need into a requirement for the District. For clarity a distinction between such a strategic requirement and local needs could be made in paragraph 4. No change is then required to (original) paragraph 6, which just refers	Amend paragraph 4 (original 3 rd sentence) to read 'Residential development will have been delivered to meet strategic housing requirements and local needs and the necessary infrastructure and community facilities / services to support growth will have been

Specific Issues raised	Response	Suggested Action
	to the type, not quantity of housing.	delivered on time.'
Specific reference to a reduction in pollution, and specifically improvements to air quality within the District, should be added. (5312)	Paragraph 2 already refers to 'the overall diversity and quality of Harborough's countryside, natural environment and built heritage will have improved'. Air quality is part of the 'natural environment'. Reference to Lutterworth being less impacted by traffic is now included. However, reference to maximising opportunities for improving air and water quality will be added.	Amend to include 'opportunities to improve air and water quality will have been maximised' at paragraph 2.
Paragraph on community facilities should include sports facilities providing the right facilities in the right place by protection, enhancement or new provision. (4436)	Agree that sports facilities should be added to list of facilities in 7 th paragraph. The further detail set out in the comment will be taken into account in policy formulation.	Amend paragraph 7 to include 'sports'.
Reference to the wealth of heritage assets within the District should be included. Change 'built heritage' to 'historic environment'. Helpful to make reference to heritage at risk being tackled here. (4627, 5078)	Agreed. Reference will be changed to 'historic environment' as it recognises the significance features of historic landscapes as well as built features. Reference to heritage at risk will be covered in policy.	Amend. Replace 'built heritage' with 'historic environment' at paragraph 2.
Need more emphasis and greater clarity on reduction of carbon emissions, beyond low carbon design, and intention to reduce pollution (air/light/noise). Emphasis should not just be on private vehicles (4737, 4988, 4328)	Agreed. Make reference to low carbon technologies at paragraph 3 long with minimising the impacts of noise and light pollution. Reference to public transport is made in paragraph 3 so the emphasis is not just on private vehicles.	Amend. Paragraph 3 to read as 'Low carbon design and technologies.....' Reference to the impacts of noise and light pollution being minimised is also included.

Proposed Revisions to Local Plan Draft Vision

In 2031, Harborough will be a vibrant, safe and prosperous District which retains its distinct identity as a predominantly rural area of villages and market towns and where local communities enjoy a high quality of life. Residents will benefit from increased access to suitable housing, a wider range of local better skilled jobs, and good quality services and facilities which promote healthy and safe lifestyles.

The District will have a diverse and thriving economy, with vibrant towns and large villages which act as employment and service centres for their surrounding rural areas. The overall diversity and quality of Harborough's countryside, natural environment and historic environment built heritage will have improved. Opportunities to improve air and water quality will have been maximised whilst the impacts of noise and light pollution will have been minimised. There will be better access to the countryside and an improved range of open spaces for local communities to enjoy.

The District will have improved resilience to the impacts of climate change, with new development located in areas of low flood risk and incorporating Sustainable Drainage Systems to manage run-off water sustainably. Low carbon design and technologies, increased provision for walking and cycling and an emphasis on improving public transport will have contributed to a reduction in the District's carbon footprint.

New development will have been delivered in the most sustainable locations. The historic market town of Market Harborough will have retained its character and strengthened its role as the District's principal town, whilst Lutterworth will be less impacted by through traffic allowing its historic centre to be appreciated. These market towns, ~~of Market Harborough and Lutterworth~~, along with the edge of Leicester settlements (Scraptoft, Thurnby and Bushby), Broughton Astley and the rural centres will have been the main focus for development. Selected rural villages will have seen small scale, sensitive development to support local needs and objectives. ~~A mix of r~~ Residential development will have been delivered to meet strategic housing requirements and local needs and the necessary infrastructure and community facilities/services required to support growth will have been delivered on time ~~to meet the needs of new and existing communities~~. In the wider countryside, appropriate small-scale development will have been allowed where this meets local needs and supports the long-term sustainability of a settlement.

The local economic base will have been strengthened through the fostering of new enterprise and the sustainable growth of existing businesses. Supporting infrastructure will be available to allow businesses to grow. Overall the workforce will be better

educated and able to respond to the needs of local businesses. The District will have full high speed broadband coverage benefitting businesses and local residents.

Strategic distribution sites will have adapted to the changing needs of the sector and maintained their significance to the District and the wider area in terms of employment provision.

New housing will reflect local needs in terms of type, size and tenure and promote greater equality of access to suitable accommodation. Older people will have increased access to accommodation to suit their changing needs and starter homes will have allowed a new generation of home owners onto the housing ladder. An increased stock of affordable homes will be available to meet the needs of those unable to afford market housing. New housing developments will be of high quality and well designed, ensuring that the character of the District's towns and villages is maintained and protected.

Communities will have access to improved social, recreational, sports, health and educational facilities. Existing valued community services will have been retained and innovative ways of service delivery introduced. The elderly, young and other vulnerable sections of the community will feel supported. Levels of crime and the fear of crime will have been further reduced.

Communities across the District will have embraced neighbourhood planning, affording them the opportunity to shape the future of their town or village through decisions relating to where and what development takes place locally.

Summary of responses to Draft Objectives (Respondent ID in brackets where appropriate)

Draft Objective 1: Housing		
<p>Meet the strategic housing requirement by providing Provide a range of market and affordable housing types, tenures and sizes in appropriate locations which to meets local housing needs, recognising the specific accommodation requirements of the aging population and the need for starter homes to help first time buyers.</p>		
Specific issues raised:	Response	Suggested action
<p>Meeting strategic housing requirement to cater for wider needs of society should also be acknowledged. The need to meet both strategic requirements and local housing needs should be referenced. Suggested wording ‘...Meet the strategic housing requirement by providing a range of market and affordable housing types, tenures and...’ (3755, 4944, 4900)</p>	<p>Local need is used to mean ‘objectively assessed need’, as well as a local mix. Objectively assessed housing need for the HMA and for each L& L local authority area was set out in the Strategic Housing Market Assessment (2014), and will be updated through the 2016 Housing and Economic Development Needs Assessment (HEDNA). It is for the plan to translate this need into a requirement for the District. The suggested change would clarify this. .</p>	<p>Amend to read ‘Meet the strategic housing requirement by providing a range of market and affordable housing types, tenures and sizes in appropriate locations to meet local needs....’</p>
Other issues taken into account		
<p>There is a need to ensure that the Local Plan builds in ability to adapt to changing circumstances over the period to 2031.</p>	<p>Add reference to responding positively to changing circumstances.</p>	<p>Amend first sentence of paragraph 4 to allow for changing circumstances.</p>
Draft Objective 2: Employment		
<p>Promote sustainable economic growth across the District through facilitating the sustainable growth of existing businesses, fostering new local enterprise and helping to create more jobs which meet local employment needs, contribute to reducing the need for out-commuting and help to increase the sustainability and self containment of communities, whilst encouraging the development of a vibrant, diverse and sustainable business community and a responsive, well-educated workforce</p>		
Specific issues raised	Response	Suggested action

The word 'existing' should be removed. (5268, 4254, 5370, 5348, 4996, 2682, 4328, 4737)	Agree that the word existing is unnecessary.	Amend to read: 'sustainable growth of businesses'
Draft Objective 3: Location of development Locate new development in sustainable locations that respect environmental capacity, prioritising <u>encouraging</u> the appropriate re-use of previously developed land and buildings where possible.		
Specific issues raised	Response	Suggested action
The prioritisation of brownfield land is contrary to NPPF paras 17 and 111, which only encourage, and not prioritise it. (3759, 4935). Few PDL opportunities remain. (4740)	Agreed.	Amend wording from 'prioritising' to 'encouraging'.
Draft Objective 4: Infrastructure Support local communities and maintain a high quality of life by ensuring that new development delivers <u>is supported by</u> the necessary infrastructure to support <u>for</u> health, education, security, culture, transport, open space, recreation, and the provision of reliable utilities for water supply and treatment , power, waste and telecommunications including high speed broadband connectivity.		
Specific issues raised	Response	Suggested action
Reference to the need to ensure there is sufficient foul sewerage network capacity would be helpful. (4571)	Agree. Reference to foul sewerage network capacity to be added.	Amend to refer to infrastructure for water supply and treatment.
Objective suggests an over-reliance on new developments to deliver all infrastructure required within the District, which is unrealistic and will not address any current under-provision in infrastructure provision. The objective also fails to recognise the responsibility of other bodies involved in the infrastructure delivery. It is also potentially not consistent with national policy. No reference to CIL. (4935)	Wording of the objective to be amended to add clarity.	Amend wording as set out above.
Draft Objective 5: Protection of local services Protect, enhance and, where appropriate, secure the provision of additional accessible community services and local facilities, supporting innovation in their delivery across the District.		

No change required		
Draft Objective 6: Natural environment		
Protect and enhance the quality, diversity, character, local distinctiveness and biodiversity of the natural environment, ensuring that open countryside is protected against insensitive and sporadic development, and that the characteristics of the local landscape are respected <u>and the unnecessary loss or sterilisation of natural resources is prevented.</u>		
Specific issues raised	Response	Suggested action
Recognition and identification of minerals safeguarding areas to prevent unnecessary sterilisation. Important to support minerals (4720)	Agreed. It is important to acknowledge the importance of the District's natural resources.	Amend to include reference to prevention of unnecessary loss of natural resources.
See response to Objective 12 also.		
Draft Objective 7: Built <u>Historic</u> environment		
<u>Protect</u> Safeguard and enhance the character and <u>historic significance</u> built heritage of the District's settlements, recognising the important contribution that heritage assets make to the distinctiveness of the District's towns, and villages <u>and countryside</u> , and the need to secure a high quality public realm.		
Specific issues raised	Response	Suggested action
No reference to wider cultural heritage and historic environment. Notable omission being the lack of recognition of Harborough's rich and well preserved rural heritage and historic landscape, including substantial and well preserved areas of ridge and furrow. (5137)	Reference to heritage assets in the countryside added.	Amended to refer to heritage assets in the countryside.
Historic England suggests Objective 7 should read: 7. Historic Environment: Protect and enhance the character and significance of the District's historic settlements recognising the important contribution that heritage assets make to the distinctiveness of the District's towns, villages, and countryside and the need to secure a high quality public realm. (4627)	Agreed. Objective amended to reflect main point of comment.	Amended as set out above.
Ignores the fact that there are heritage assets in the countryside (outside of towns and villages) that should be reused practically and	Objective amended to recognise heritage assets in the countryside.	See amended objective.

beneficially as new housing as advocated in paragraph 55 of the Framework. (4944)		
<p>Draft Objective 8: Town/village centres</p> <p>Support and enhance the vitality and viability of town and village centres, as places for shopping, leisure, cultural, commercial and community activities, recognising their valued role as the heart of their communities and encourage retail, leisure and commercial development in appropriate locations.</p>		
<p>No change required</p>		
<p>Draft Objective 9: Design</p> <p>Ensure that new development is of high quality and sustainable design which reflects local character and distinctiveness, provides attractive and healthy environments, promotes community safety, reduces anti-social behaviour, reduces the fear and incidence of crime, is supported by appropriate facilities and services, respects residential amenity, promotes sustainable behaviours <u>including waste reduction</u>, and is flexible, meeting Lifetime Homes requirements.</p>		
<p>See Objective 12 response</p>		
<p>Draft Objective 10: Transport</p> <p>Provide greater opportunities to reduce car use and the impacts of road traffic on local communities, the environment and air quality, by locating most development where there is good access to jobs, services and facilities, and by supporting improvements in public transport and walking/cycling networks.</p>		
<p>No change required</p>		
<p>Draft Objective 11: Flood risk</p> <p>Locate new development in areas which will not put life or property at risk of flooding and build resilience by requiring the use of Sustainable Drainage Systems in new development and allowing for the provision of infrastructure associated with minimising flood risk.</p>		
<p>No change required</p>		
<p>Draft Objective 12: Environmental impact</p> <p>Reduce the environmental impact of development and its vulnerability to the impacts of climate change reducing pollution and waste <u>by</u> maximising water and energy efficiency, and promoting the use of low carbon technologies and sustainable construction methods.</p>		
<p>Specific issues raised</p>	<p>Response</p>	<p>Suggested action</p>

Loss of agricultural land to development (2685)	Objective 3 encourages the use of previously developed land. NPPF specifies that planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality. Objective 6 now refers to preventing the loss or sterilisation of natural resources.	See amended Objective 6.
Reducing pollution and waste would be better expanded and separated from the other elements of this objective which relate to climate change. Reducing pollution is particularly relevant to Harborough District given the Council has declared an Air Quality Management Area in Lutterworth Town Centre. It is relevant therefore for 'reducing pollution' to not only be recognised in its own right, but also expanded to add reference to the improvement of air quality within Lutterworth Town Centre as an objective of the New Local Plan. (5312)	Pollution and waste to be removed from this objective. Reducing waste is now within objective 9. Air quality is already covered in Objective 10 and therefore should be removed from this objective.	Objective 9 amended to include reference to waste.
Draft Objective 13: Tourism and culture		
Promote the sustainable growth of tourism, cultural activities and access to the countryside across the District for the benefit of both residents and visitors.		
No change required		
Draft Objective 14: Neighbourhood planning		
Encourage and support communities to make decisions at the local level through the preparation of neighbourhood plans and facilitate this process by setting out a clear strategic policy framework for their preparation.		
No change required		

A5.2 Sustainable Settlements

The New Local Plan Options Consultation Paper set out a draft settlement hierarchy for the District for comment. Ensuring that development is directed to the appropriate locations is an important way to achieve sustainable development across the District. Through assessing the level of services and facilities accessible to residents, a draft settlement hierarchy was established which

identified an appropriate approach to future development for settlements within each tier. This was set out in Section 4 of the Options Paper. Although there was no specific question, the various tiers of the settlement hierarchy allowed comments to be submitted.

Number of respondents and representations

A total of 88 representations were made on this section as set out in the table below. In addition there were 113 responses from residents of Great Easton supporting their continued designation as a Selected Rural Village. Table A5.2a shows the breakdown of representations in relation to the Sustainable Settlements' section.

Table A5.2a: Number of respondents and representations to Sustainable Settlements

Breakdown of Representations to Sustainable Settlements					
Paragraph	Respondents	Representations			
		Support	Object	Comment	Total
Harborough's Settlement Hierarchy	27	8	9	12	29
Principal Urban Area	6	4	2	0	6
Sub Regional Centre	5	3	2	2	7
Key Centres	7	5	1	1	7
Rural Centres	13	3	3	8	14
Selected Rural Villages	16	4	6	6	16
Sub-Selected Rural Villages	7	3	2	2	7
Other Settlements	6	0	4	3	7
	TOTAL	30	29	34	93

Summary: Overall there was a reasonable level of support for the draft settlement hierarchy, although some of this support was qualified. Rural Centres and Selected Rural Villages attracted the most responses with the latter attracting the highest number of objections. Table A5.2b below sets out an overall summary of the responses received on each tier of the settlement hierarchy.

Table A5.2b: Summary of responses to Draft Settlement Hierarchy

Principal Urban Area
<p>Summary of responses: Overall there was agreement that the PUA is the most sustainable location for development and with its position at the top of the settlement hierarchy, particularly from the development industry. Local responses, however, questioned the sustainability of Scraftoft, Thurnby and Bushby, particularly in respect of access to services and facilities, despite its proximity to Leicester.</p> <p>Specific issues raised:</p> <p>Some respondents felt that Great Glen should be reclassified as a settlement within the PUA as it has a more comprehensive service provision than Scraftoft, Thurnby and Bushby. It has excellent transport and pedestrian links to the Leicester PUA which is less than a mile away. It benefits considerably from its proximity to the services and facilities within Oadby.</p> <p>Several respondents including Thurnby and Bushby PC consider that Scraftoft, Thurnby and Bushby should not be identified at the top of the settlement hierarchy. The proximity to the City of Leicester is by no means the only measure of sustainability which should be taken into account. The Council should not allow the absorption of key village settlements into the City of Leicester.</p>
Sub-Regional Centre
<p>Summary of responses: Whilst it was recognised that Market Harborough fulfils the role of a Sub-Regional Centre, there was concern over the integration of new development around the town and the need for investment to manage traffic flow more effectively; the strategy for the town needs to take these issues into account.</p> <p>Specific issues raised:</p> <p>One respondent pointed out that, as currently set out, the approach to development for the Sub-Regional Centre is the same as that set out for Key Centres. If Market Harborough is more sustainable than Lutterworth or Broughton Astley, this should be reflected in approach to development.</p>
Key Centres

Summary of responses: There was general support for the 2 identified Key Centres, mainly from developers. The lack of sustainable transport provision and the resulting reliance on private car use in these settlements was raised. The need to ensure that the type and level of development respects the settlement's heritage and character was also raised.

Specific issues raised

One developer felt that in relation to Broughton Astley, the settlement hierarchy has not been used to inform the distribution options.

Another respondent raised that Lutterworth should be considered for Sub-Regional Centre status.

Rural Centres

Summary of responses: There was criticism that identifying Rural Centres in terms of access to key services is over simplistic insofar as it does not take into account their capacity or long term viability. This, along with the need for development to be of an appropriate level and type that respects the historic heritage and character, was an issue raised by several local respondents. The identification of the Rural Centres was generally supported by developers/agents.

Specific issues raised

Some agents/developers felt that Great Bowden should be identified as a Rural Centre given its level of key services and sustainable location close to Market Harborough. Several respondents, including Kibworth Harcourt PC, felt that identification based on at least 4 out of 6 key services is over-simplistic and does not take into account the capacity of these services.

Selected Rural Villages

Summary of responses: Local concern was expressed that the methodology for the identification of SRVs is unsophisticated and that services / facilities already at capacity should not be used to justify further development in Selected Rural Villages. The fact that public transport services are not taken into account also raised concerns. There was strong support for Great Easton remaining a Selected Rural Village.

Specific issues raised

Claybrooke Magna PC along with 2 other respondents considered Claybrooke Magna's identification as a Selected Rural Village is unacceptable as it only has 1 key service within the village.

Several respondents felt that identification based on at least 2 out of 6 key services is not sophisticated and does not take into account the capacity of these services. There should be recognition across the settlement hierarchy that the categorisation may be imprecise.

Sub-Selected Rural Villages

Summary of responses: Of the few comments made most expressed the view that these settlements could accommodate some limited new development and that this approach would reflect the National Planning Policy Framework in respect of rural development and supporting sustainable rural communities.

Specific issues raised

One respondent pointed out that Drayton no longer has a village hall and therefore should not be a sub-selected rural village.

One landowner felt that Stoughton should be identified as a Selected Rural Village given its close proximity to the main urban area and the opportunities for infill development.

A couple of respondents felt that the services on which the designation is made are not equally valuable to the local community (i.e. cannot equate a village hall to a local food store)

Several respondents considered that the current approach to development in rural settlements does not reflect the NPPF aim of supporting rural development and rural communities. Identification should not be based on number of key services alone. No account is taken of NPPF (para 55) which recognises that development in one village could support services in a nearby village. There needs to be a broader analysis of how local communities function.

Other Settlements

Summary of responses: Of the few comments made, most expressed the view that these settlements could accommodate some very limited new development. Such an approach would be more reflective of the National Planning Policy Framework in respect of rural development and supporting sustainable rural communities.

The point was made that the implication from the hierarchy that development in small settlements or in the countryside would be unacceptable in policy terms is not supported by national guidance. The role of rural PDL in delivering housing in rural areas is not recognised.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. The Proposed Submission Local Plan proposes adjustments to Settlement Hierarchy in order to deliver development across the District to 2031 including:

- Reference to Market Harborough's higher levels of employment, services and facilities and access to sustainable modes of transport to distinguish it from the Key Centres;
- Houghton on the Hill as Rural Centre;
- Joint Selected Rural Villages identified where a primary school is shared and is within safe walking distance (The Claybrookes, Church and East Langton, and Great Easton with Bringhurst);
- Minimum of 400 households criteria introduced for Rural Centres;

- Minimum of 100 households criteria introduced for Selected Rural Villages; and
- Great Bowden and Great Easton with Bringhurst not proposed as Rural Centres based on relationship to Market Harborough and new household number criteria respectively

A5.3 Housing and Employment Options

Option 1: Rural

Summary of the Option:

Under this option a total of 60% of the District's future housing need would be met in the urban settlements (Thurnby, Bushby and Scraftoft, Market Harborough, Lutterworth and Broughton Astley) and 40% met in the rural settlements (Rural Centres and Selected Rural Villages).

The bulk of general employment provision would be in Market Harborough (approximately 10ha), with at least 4ha in Lutterworth and approximately 3ha in Fleckney to balance its relatively high potential housing growth. There would also be additional provision for strategic distribution close to Magna Park, the scale of which is yet to be determined.

Table 5.3a sets out a summary of the consultation responses received to Option 1 (Rural), highlighting the key issues raised in objection and support of the option.

Table 5.3a: Summary of responses to Option 1 (Rural)

Option 1: Rural - Consultation Responses
Number of respondents: 248 Total representations: 274 <ul style="list-style-type: none"> • Objecting: 180 • Supporting: 83 • Commenting: 11

Of the 9 options presented, this option attracted:

- Sixth highest number of respondents;
- Fifth highest number of representations;
- Fifth highest number of objecting representations; and
- Fourth highest number of supporting representations.

Key issues raised in objections:

44 objecting comments came from Scraptoft, Thurnby Bushby, with another 28 from residents of the Kibworths. Another 26 originated from Houghton on the Hill and 12 from Medbourne. Residents of 17 other settlements objected to this option.

Many respondents, including the Highway Authority, felt that this approach would place too much development in rural villages and would risk creating unsustainable patterns of development. The Highway Authority is concerned that by not locating development in the most sustainable locations, reliance of the use of the private car would increase, particularly in light of recent cuts to public transport. Significant rural based growth will be heavily car dependent and people being isolated from work and social needs.

The capacity of local services, facilities and the rural road network to cope with growth under this option was a major concern, with many expressing that both schools and doctors' surgeries are already full and unable to cope with increased demand. The numbers of dwellings involved would not deliver meaningful infrastructure to overcome capacity issues.

PUA residents were concerned over the impact of additional development, over and above that already built and committed, on traffic, services and separation between the settlements. Nearby Houghton on the Hill residents were concerned over the high number suggested for the village under this option and how new development would lead to further traffic and parking issues (Main Street) and the effect on the character of their village. The assimilation of new residents into the community was highlighted.

Issues relating to infrastructure capacity were particularly prevalent in responses from the Kibworths with concerns over local traffic and access onto the A6 strongly expressed along with the lack of capacity of GP surgeries and schools. The high growth figure for Fleckney caused concern not only within Fleckney but also in the Kibworths due to impact on the local road network and the likelihood of exacerbating current highway issues.

Of the 15 Parish Councils that responded to this option, all but 1 objected with many questioning the ability of the settlement to accommodate the indicated level of housing growth in terms of impact on local infrastructure and loss of rural character.

There were several responses concerned over the impact development would have on the character of individual settlements and of the District as a whole. Some raised the issue that such a pattern of development was inconsistent with the Vision set out in the options paper and felt that rural settlements should be protected.

Lutterworth Town Council indicated that the piecemeal approach to development under this option would not deliver the correct level of infrastructure for the town.

Some respondents felt that the distribution of housing should follow decisions regarding the location of employment provision so as to avoid, as far as is possible, extensive commuting. Others felt that an option of no further development around Magna Park should be considered.

Key issues raised in support:

The majority of comments supporting this option came from residents of the Scraftoft, Thurnby and Bushby area (51). This approach found support among those promoting rural land for development.

Almost half of those expressing support for this approach felt that was the most equitable approach to the location of development to 2031, with no one area subjected to excessive development. By spreading development across the District some respondents felt that it could avoid placing undue strain on certain areas and revitalise some rural. Others cited potential benefits of this approach for rural areas such as the delivery of affordable housing in rural villages, support for local services and facilities, and encouraging the growth of the rural economy as promoted by the NPPF. This option also found support amongst those who considered an over reliance on strategic development areas to be a risky approach to the delivery of development. There was a feeling that this approach could aid housing deliverability in the short term. Some suggested that this is a balanced distribution which reflects the rural nature of the District and is best able to support and sustain all communities.

Key issues raised in comments:

Thurnby and Bushby PC commented that by spreading development across the District the benefits on infrastructure across the District would be proportionately low.

Anglian Water has indicated that this more dispersed distribution option is likely to have a greater impact on its infrastructure than the other options. However, it wishes to comment further when specific housing sites have been identified by the Council.

The County Council has indicated that there may be difficulty in extending the schools in the following locations:

- Houghton on the Hill
- Husbands Bosworth
- Claybrooke Magna
- Dunton Bassett
- Gilmorton
- Great Bowden
- Tugby

Oadby and Wigston Borough Council commented that development options in the proximity of the Borough or which would place extra traffic on the A6 will require very careful consideration in the context of the relationship with growth already planned in the Borough to 2026 and development options beyond 2026; additional congestion on the A6 in the Borough and in Leicester City; additional congestion on routes around the A6 (in particular east-west routes, Fosse Park/J21/M1/M69); and impact on countryside and green wedge adjoining Leicester PUA.

Developers/agents suggest that a higher figure for the Kibworths is warranted, given its position in the settlement hierarchy and good range of services/facilities; a particular focus on rural areas is not the most sustainable and that this is identified as the worst in terms of resource use in the SA; and that the figures are not evidence led and do not reflect the development actually required.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. Option 1 (Rural) approach has not been taken forward as it focuses more development in rural settlements with limited facilities/infrastructure than other options, high reliance on private cars, and therefore has the potential to result in unsustainable patterns of development. Option 1 was not considered deliverable due to a lack of available housing land in some settlements. Option 1 was identified as the most unsustainable option in the Sustainability Appraisal.

Option 2: Core Strategy Distribution

Summary of the Option:

Under this option the distribution of future housing need would broadly continue as identified in the existing adopted Core Strategy, with approximately 70% of future new housing planned for the urban settlements and 30% planned for the rural settlements.

The bulk of general employment provision would be in Market Harborough (approximately 10ha), with at least 4ha in Lutterworth and approximately 3ha in Fleckney to balance its relatively high potential housing growth. There would also be additional provision for strategic distribution close to Magna Park, the scale of which is yet to be determined.

Table A5.3b below sets out a summary of the consultation responses received to Option 2 (Core Strategy Distribution), highlighting the key issues raised in objection and support of the option.

Table A5.3b: Summary of responses to Option 2 (Core Strategy Distribution)

Options Consultation Responses
<p>Number of respondents: 218 Total representations: 236</p> <ul style="list-style-type: none">• Objecting: 160• Supporting: 57• Commenting: 19 <p>Of the 9 options presented, this option attracted:</p> <ul style="list-style-type: none">• Lowest number of respondents;• Lowest number of representations;• Seventh highest number of objecting representations; and• Seventh highest number of supporting representations.
<p>Key issues raised in objections:</p> <p>The highest number of representations objecting to this option came from residents of Scraftoft/Thurnby/Bushby (58) followed by those from Houghton on the Hill (27). The Kibworths accounted for a further 14 representations whilst Market Harborough, Great Bowden, Foxton and Medbourne all had 5. There were objections from a handful other settlements.</p> <p>12 Parish Councils objected to this option expressing concern over impact on local services, road infrastructure and village character. Market Harborough Civic Society and Lubenham PC felt that the numbers for Market Harborough were unacceptably high (taking into account commitments) and that the option does not allow for growth already in the pipeline to be absorbed. Other comments related to a lack of detail regarding how already stretched services would be improved or how traffic congestion would be eased.</p> <p>Residents from Scraftoft, Thurnby and Bushby objected to the numbers for the parishes raising issues relating to traffic congestion, high number of outstanding commitments, disproportionate new development over recent years, lack of service/facility capacity and improvement along with the potential loss of village identity.</p> <p>The Kibworths' residents objected to the option on the grounds that local schools and GPs are at capacity, traffic congestion in the village, poor access onto the A6 and worsening air quality. Kibworth Harcourt lacks food store or meeting place despite recent growth. Congestion, access to A6 poor and air quality all worsening. Concern was also expressed regarding the high numbers proposed for Fleckney and its impact not only on the village but also on surrounding rural roads and the Kibworths.</p>

Regarding the rural villages, it was felt that the numbers proposed were too high, given that villages lack the services, road infrastructure and public transport to absorb additional housing. Loss of rural character was raised along with the lack of employment opportunities. It was suggested that the approach does not reflect the draft vision. Houghton on the Hill and Great Bowden respondents were concerned over the impacts on traffic/parking and local services and facilities.

Whilst the above comments related to numbers being too high, some respondents, mainly developers/site promoters felt that the housing figures under option 2 were too low. More specifically it was suggested that the Kibworths should have a higher level of development given its good range of services and facilities; there is scope for more development to be accommodated in the Leicester PUA and Market Harborough as the most sustainable locations in the District; and the option fails to have regard to the availability of specific deliverable and developable sites and therefore is contrary to the NPPF. Lutterworth Town Council objected to the option on the basis that that the town will not receive appropriate level of infrastructure support with a piecemeal approach to development.

Some respondents felt that the distribution of housing should follow decisions regarding the location of employment provision so as to avoid, as far as is possible, extensive commuting. Others felt that an option of no further development around Magna Park should be considered.

Key issues raised in support:

Of those residents supporting this option, 21 representations came from Scraftoft, Thurnby and Bushby and 18 representations came from the Kibworths. Another 5 came from the Cotesbach area.

Kibworth Harcourt PC supported this approach emphasising the role of the neighbourhood plan in providing appropriate policies for the villages (taking into account infrastructure capacity). Cotesbach PC felt that the approach has worked well to date and allows a fair distribution which meets the plan's draft vision/objectives.

Supporting comments suggested that it is fair and sensible to locate development in most sustainable locations whilst keeping rural settlements alive. The option spreads development across the District, whilst minimising its impact on infrastructure. Some suggested that this distribution has worked well up to now. The need to allow for housing choice in rural areas to help address lack of affordability and to provide affordable housing in rural areas was also highlighted in support of the option.

Key issues raised in comments:

Anglian Water has indicated that the potential Market Harborough development sites likely to require improvements to foul sewerage network, and possibly additional sewage treatment enhancements.

The County Council has indicated that further infill development at Market Harborough could be problematic and that there may be difficulty in extending the schools in the following locations:

- Houghton on the Hill
- Husbands Bosworth
- Claybrooke Magna
- Dunton Bassett
- Gilmorton
- Great Bowden
- Tugby

The County Highway Authority points to the need to have the outcomes of the Market Harborough transport study (currently underway) to assess the ability of the town to accommodate further strategic housing growth. The scale of infrastructure needed might not be fundable by developers alone. It also highlights increased risks of putting further housing numbers on the eastern edge of the PUA in combination with growth to the north-east of the PUA due to the impact on strategic traffic issues including Leicester City roads.

Oadby and Wigston Borough Council commented that development options in the proximity of the Borough or which would place extra traffic on the A6 will require very careful consideration in the context of the relationship with growth already planned in the Borough to 2026 and development options beyond 2026; additional congestion on the A6 in the Borough and in Leicester City; additional congestion on routes around the A6 (in particular east-west routes, Fosse Park/J21/M1/M69); and impact on countryside and green wedge adjoining Leicester PUA.

Developer/agent comments include:

- whilst responding well to market demand, this approach relies on the delivery of the MH SDA which has large, expensive infrastructure requirements which may delay effective delivery; and
- the approach will help support and underpin the retail and other services in Market Harborough and add to overall resilience and sustainability of the town.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. Option 2 has not been taken forward due to potential housing land deficits in some settlements, impact on built/natural heritage and the natural environment including the character of rural settlements and impact on carbon emissions of distributing more housing to rural villages than under SDA options. Similarly it does not present the opportunity to create new places on a community scale unlike SDA options.

However, the Core Strategy distribution has been used as a basis for the distribution of the residual housing requirement remaining after the 2 SDA housing numbers have been taken into account.

Option 3: Urban

Summary of the Option:

Under this option a total of 80% of the District's future housing need would be met in the urban settlements and 20% met in the rural settlements.

The bulk of general employment provision would be in Market Harborough (approximately 10ha), with at least 4ha in Lutterworth and approximately 3ha in Fleckney to balance its relatively high potential housing growth. There would also be additional provision for strategic distribution close to Magna Park, the scale of which is yet to be determined.

Table A5.3c below sets out a summary of the consultation responses received to Option 3 (Urban), highlighting the key issues raised in objection and support of the option.

Table A5.3c: Summary of responses to Option 3 (Urban)

Options Consultation Responses
<p>Number of respondents: 220 Total representations: 238</p> <ul style="list-style-type: none">• Objecting: 125• Supporting: 96• Commenting: 17 <p>Of the 9 options presented, this option attracted:</p> <ul style="list-style-type: none">• Next to highest number of respondents;• Next to highest number of representations;• Third highest number of objecting representations; and• Next to highest number of supporting representations.
<p>Key issues raised in objections:</p> <p>The highest number of objections to option 3 came from the Scraftoft, Thurnby and Bushby area (60) with a further 12 representations originating from nearby Houghton on the Hill (12). Other settlements with 5 or more objecting representations were Cotesbach, the Kibworths and Market Harborough.</p>

Lutterworth Town Council, Market Harborough Civic Society (MHCS) and 5 parish councils objected to the option. MHCS and Lubenham PC feel that the option sees too much development going to Market Harborough. Lutterworth Town Council, Cotesbach PC and Swinford PC all raise issues around piecemeal development not delivering the correct level of infrastructure support (namely a relief road) whilst at the same time exacerbating current traffic problems.

Scraptoft, Thurnby and Bushby residents are concerned regarding the impact of further development on traffic congestion, the high number of outstanding commitments, the disproportionate new development over recent years, lack of service/facility capacity and improvement. They are also concerned that development outside of the District is impacting on the villages. The risk of loss of village identity and threat to village separation area were highlighted. The need to improve traffic flow substantially is raised. The area has been neglected in terms of funding for services and facilities. They emphasise that the villages are not an urban centre.

Taking into account current commitments concern was expressed that this approach, with its piecemeal developments, would overwhelm the Market Harborough and its services. There was concern that there is no indication of any infrastructure benefits to alleviate the situation. Increased traffic congestion, worsening air quality and loss of 'market town' feel were also raised as potential issues. It was also felt that development on this scale would impact on A6 through Kibworth, exacerbating access issues already being experienced. The ability of one housing market (Market Harborough) to deliver this scale of housing to 2031 (bearing in mind current commitments) is questioned as is the number of suitable sites in the town to deliver this scale of housing growth.

There were also a number of comments relating to provision in settlements being too low or piecemeal. Some, including a number of landowners/promoters, felt that the approach would not sustain villages, leading to house price rises, social stagnation and potential loss of services. There was some criticism that the distribution does not reflect the role of rural centres or take into account housing land availability in rural areas which could contribute to housing growth and affordable housing.

Some respondents felt that the distribution of housing should follow decisions regarding the location of employment provision so as to avoid, as far as is possible, extensive commuting. Others felt that an option of no further development around Magna Park should be considered.

Key issues raised in support:

Supporting comments came in mainly from residents of the Kibworths (25) Scraptoft, Thurnby and Bushby (24) and Houghton on the Hill (16).

Most comments in support of option 3 felt that directing development to urban areas is the most sustainable approach as these areas have the infrastructure, public transport and employment opportunities. The approach allows rural areas to keep their character and eases pressure on rural roads, services and facilities. It was felt that the more modest development level for Fleckney would impact less on services, facilities and the local road network.

8 Parish Councils supported this option as being sustainable and impacting less on rural character, rural roads and community cohesion.

Key issues raised in comments:

Anglian Water has indicated that the potential Market Harborough development sites likely to require improvements to foul sewerage network, and possibly additional sewage treatment enhancements.

The County Highway Authority point to the need to have the outcomes of the MH transport study (currently underway) to assess the ability of the town to accommodate further strategic housing growth. The scale of infrastructure needed might not be fundable by developers alone. It also highlights the increased risks of putting further housing numbers on the eastern edge of the PUA in combination with growth to the north-east of the PUA (impact on strategic traffic issues including Leicester City roads).

The County Council has indicated that further infill development at Market Harborough could be problematic and that there may be difficulty in extending the schools in the following locations:

- Houghton on the Hill
- Husbands Bosworth
- Claybrooke Magna
- Dunton Bassett
- Gilmorton
- Great Bowden
- Tugby

Oadby and Wigston Borough Council commented that development options in the proximity of the Borough or which would place extra traffic on the A6 will require very careful consideration in the context of the relationship with growth already planned in the Borough to 2026 and development options beyond 2026; additional congestion on the A6 in the Borough and in Leicester City; additional congestion on routes around the A6 (in particular east-west routes, Fosse Park/J21/M1/M69); and impact on countryside and green wedge adjoining Leicester PUA.

Some respondents questioned the ability of Market Harborough to accommodate level of growth identified and suggest that other places should take some of the town's growth.

Given the potential level of investment, the need for a vision and master plan for the town is raised. Also expressed is the view that growth will consolidate the town's position as the primary centre for the District.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. Option 3 (Urban) approach has not been taken forward. It does not deliver the amount of housing land required as there would be insufficient SHLAA site capacity in Market Harborough and Lutterworth to meet the potential requirement. It also fails to deliver a 5 year land supply at the date of Local Plan adoption and puts pressure on existing infrastructure in Market Harborough and Lutterworth.

Option 4: Scraptoft/Thurnby Strategic Development Area (SDA)**Summary of the Option:**

A proposal has been received which would provide a significant extension to the East of Scraptoft and Thurnby within Harborough District. The proposal is for at least 1000 dwellings with community facilities and a link road between Scraptoft village and the A47. Considerable further assessment of transport impact, landscape and viability is needed to test whether it is appropriate for allocation. Delivery of this strategic development area would reduce the requirement for all other settlements in the District.

The bulk of general employment provision would be in Market Harborough (approximately 10ha), with at least 4ha in Lutterworth and approximately 3ha in Fleckney to balance its relatively high potential housing growth. The potential SDA at Scraptoft does not include proposals to deliver employment land at present, but this will be considered further. There would also be additional provision for strategic distribution close to Magna Park, the scale of which is yet to be determined.

Table A5.3d below sets out a summary of the consultation responses received to Option 4 (Scraptoft/Thurnby SDA), highlighting the key issues raised in objection and support of the option.

Table A5.3d: Summary of responses to Option 4 (Scraptoft/Thurnby SDA)

Options Consultation Responses
Number of respondents: 254 Total representations: 271 <ul style="list-style-type: none">• Objecting: 227• Supporting: 32

- **Commenting: 12**

Of the 9 options presented, this option attracted:

- Fifth highest number of respondents;
- Sixth highest number of representations;
- Third highest number of objecting comments;
- Next to lowest number of supporting comments.

Key issues raised in objections:

Of the representations objecting to option 4, the majority came from residents of Scraptoft, Thurnby and Bushby (142) with another 24 coming from Houghton objecting to the figure for their village and the impact of the scale of development proposed for the PUA.

13 parish councils objected to this option. Whilst some were concerned directly with the impact of the potential SDA, others felt that the numbers for their settlement are too high. Lutterworth PC objected as the town would not receive the correct level of infrastructure support through piecemeal development. Market Harborough Civic Society expressed concern over the level of development for the town.

Scraptoft, Thurnby and Bushby residents, along with both Parish Councils, are concerned regarding the impact of further development on traffic congestion, the high number of outstanding commitments, the disproportionate new development over recent years, lack of service/facility capacity and improvement. They are also concerned that development outside of the District is impacting on the villages. The risk of loss of village identity and threat to village separation area issues are highlighted. The need to improve traffic flow substantially is raised. The view is expressed that the area has been neglected in terms of funding for services and facilities. Some respondents emphasise that the villages are not an urban centre despite their location on the edge of Leicester and that there are poor transport links with Leicester.

There are specific concerns relating to the potential Scraptoft/Thurnby SDA link road. Many felt that it would be unable to resolve A47 congestion issues; it would not ease congestion in Scraptoft village; it would become a rat-run between the A46 and A47 therefore increase traffic at Scraptoft; and it would impact on the local landscape. It was felt that development on the scale proposed would merely deliver more cars onto already congested roads, without any benefits to the local communities and rendering local roads more unsafe. Stoughton Parish Council felt that such large scale development at the PUA would increase traffic movements between A47 and A6 and impact on their village.

Respondents from Houghton on the Hill, including the Parish Council, are particularly concerned regarding the impacts of scale of development (both within the village and at the PUA) on traffic issues, access to potential sites, the assimilation of new residents into the community and the erosion of separation with Thurnby and Bushby.

Whilst the majority of objecting comments focus on the scale of development being too high for settlements, some from developers/promoters feel that provision at Kibworth and Broughton Astley does not reflect the settlement's role in the settlement hierarchy and does not support the draft vision. Others consider the distribution does not allow sufficient flexibility; does not reflect the available supply of housing land; relies on

the delivery of one site which could take time to come on stream.

Some respondents felt that the distribution of housing should follow decisions regarding the location of employment provision so as to avoid, as far as is possible, extensive commuting. Others felt that an option of no further development around Magna Park should be considered.

Key issues raised in support:

The majority (21) of representations in support of this option came from the Kibworths. Kibworth Harcourt PC also supported this option. Many of these respondents feel that development adjacent to Leicester City with its range of services, facilities, employment opportunities and connectivity offered a sustainable approach with less environmental impact than development in rural areas. It was felt that this option's approach to development in the Kibworths is reasonable, recognising its infrastructure limitations. However there are still concerns over the potential increase in traffic on the A6 impacting on the Kibworths.

Key issues raised in comments:

The County Highway Authority commented that any proposals for strategic growth in the Scraftoft/Thurnby area could be limited unless and until a strategy can be put into place to address cumulative traffic issues in the north east of the PUA. The link road might address some local issues but could encourage rat-running of more strategic traffic trying to avoid congestion on the main road network in the north east of the PUA. The viability of this scale of infrastructure would also need to be carefully assessed.

The County Education Authority expressed support for the principle of an SDA from an education perspective as the proposal is large enough to provide a new school. LCC Economic Growth highlighted the need to ensure sites are truly deliverable and financially viable, particularly if the supporting infrastructure required is extensive.

Oadby and Wigston Borough Council commented that development options in the proximity of the Borough or which would place extra traffic on the A6 will require very careful consideration in the context of the relationship with growth already planned in the Borough to 2026 and development options beyond 2026; additional congestion on the A6 in the Borough and in Leicester City; additional congestion on routes around the A6 (in particular east-west routes, Fosse Park/J21/M1/M69); and impact on countryside and green wedge adjoining Leicester PUA.

Other comments suggest that rural development could complement the single SDA approach (providing short term development opportunities) and question the sustainability credentials of the SDA site, despite its position in the settlement hierarchy.

How comments have informed the Proposed Submission Local Plan:

Following the Options Consultation a proposal emerged for 1200 dwellings on public sector owned land to the north of Scraptoft village including Scraptoft Golf Club, the Local Nature Reserve and land designated as Green Wedge in the Core Strategy. The proposal has been the focus of further investigation and an SDA on land to the north of Scraptoft has been found to be viable and deliverable. This Scraptoft North SDA is allocated in the Proposed Submission Local Plan for the delivery of approximately 1200 dwellings. The Plan also allocates land to the east of Houghton on the Hill for the relocation of the Golf Club. Provision is also made to protect and enhance valuable areas of biodiversity and Green Wedge. Policy SC1 sets out in detail what the new neighbourhood will be expected to deliver.

Option 5: Kibworth Strategic Development Area (SDA)

Summary of the Option:

Two alternative proposals near the Kibworths have been received and this option is derived from these. Both proposals offer new road infrastructure, community and employment facilities and around 1,200 houses. One proposal involves development to the north and east of Kibworth Harcourt and a potential relief road for the existing A6. Another involves development to the north and west of the Kibworths and linking road infrastructure between the A6 and Fleckney Road. Considerable further assessment of transport impact, landscape and viability is needed in terms of both proposals to test whether either is appropriate for allocation.

This option would include just one of these two potential alternative strategic development areas at the Kibworths.

Delivery of either potential strategic development area would reduce the requirement for all other settlements in the District.

Approximately 5ha of employment land would be delivered as part of the potential Kibworth SDA. A further 10ha (approx.) of employment land would be delivered in Market Harborough along with at least 4ha in Lutterworth and approximately 3ha in Fleckney to balance its relatively high potential housing growth. There would also be additional provision for strategic distribution close to Magna Park, the scale of which is yet to be determined.

Table A5.3e below sets out a summary of the consultation responses received to Option 5 (Kibworth SDA), highlighting the key issues raised in objection and support of the option.

Table A5.3e: Summary of responses to Option 5 (Kibworth SDA)

Options Consultation Responses
<p>Number of respondents: 305 Total representations: 328</p> <ul style="list-style-type: none">• Objecting: 239• Supporting: 77• Commenting: 12 <p>Of the 9 options presented, this option attracted:</p> <ul style="list-style-type: none">• Third highest number of respondents;• Third highest number of representations;• Next to highest number of objecting representations; and• Fifth highest number of supporting representations.
<p>Key issues raised in objections:</p> <p>The majority of representations objecting to this option came from residents of the Kibworths (148). Kibworth Harcourt and Kibworth Beauchamp Parish Councils also objected to the option due to the potential impacts on the Kibworths, along with Fleckney PC and Burton Overy PC. Lutterworth Town Council object to the option as piecemeal development would not deliver the infrastructure needed (i.e. eastern relief road) for the town. 8 other parish councils objected to the option. Market Harborough Civic Society and Lubenham PC were concerned over the number of homes identified for Market Harborough.</p> <p>Objections from the Kibworths (including the Parish Councils) raised concerns in relation to the capacity of services and facilities (particularly schools and GP surgeries). The capacity of the primary school was raised by the school's Governors and Head as they consider that the continuous growth of village puts unreasonable strain on school and that the quality and quantity of education will suffer. Access to school was raised as major concern. The scale of recent housing development has already put schools and GP surgeries under severe pressure. Traffic around the villages and difficulties in accessing the A6, especially at peak periods, is highlighted by many respondents: a situation that will be further exacerbated by the development of the MH SDA. Further traffic will give rise to additional pollution and noise to the detriment of villagers. Objections relating to the loss of village identity were common, with residents fearing a change from historic village to town and associated loss of rural character, attractive countryside, wildlife habitat and heritage value. There was dismay at the radical change this option would represent from Core Strategy policy for the villages, with many feeling that the settlement needs time to adjust to KB/1. A small minority recognised that the village could take more housing but emphasised that only steady housing increase would help maintain the strong sense of community. There was a feeling that the neighbourhood plan process could provide the opportunity to provide a comprehensive review of the Kibworths' capacity for further development.</p>

There was some scepticism as to whether the proposed bypass would be affordable and whether it would solve A6 congestion issues. There was a feeling that it could just create other pinch points in the local road system. The impact on highway capacity within the City also needs to be considered as this may affect delivery. Some of the surrounding villages also raised concerns over how the scale of development would impact on local rural roads.

In other objections, developer/promoters were concerned that the approach places undue reliance on one area, which may take a long time to deliver, rising a lack of flexibility; and it ignores housing land availability evidence in other, potentially more sustainable settlements including the PUA and Market Harborough.

Some respondents felt that the distribution of housing should follow decisions regarding the location of employment provision so as to avoid, as far as is possible, extensive commuting. Others felt that an option of no further development around Magna Park should be considered.

Key issues raised in support:

The majority of support for this option came from residents of the Scraftoft, Thurnby and Bushby area (62) due to its relatively modest potential housing numbers for these settlements. Other support came mainly from site promoters/developers.

Key issues raised in comments:

Anglian Water Services Ltd commented that development of either SDA is expected to require improvements to foul sewerage network and sewage treatment enhancements.

Leicestershire County Highway Authority has commented that evidence shows that A6 London Road south of the Ring Road is likely to require further attention and investment to 2031. The area is already under significant traffic pressures and proposals for strategic growth on or around south eastern edge of PUA will exacerbate these problems. As a result it suggests that options for strategic growth in places such as the Kibworths could be limited unless and until a strategy for addressing issues on the south side of the PUA can be put in place. Further transport modelling will be needed to assess the impacts on the PUA (applies to both SDAs). Substantial on and off site transport infrastructure would be needed to mitigate impacts so there would need to be certainty that developments remained financially viable.

Leicestershire County Council Education supports the principle from an education perspective of providing a primary school. However, it acknowledges that there may be an issue at secondary level. LCC Economic Growth stresses the importance of the county's rural economy and importance of providing market and affordable housing to meet identified local need whilst minimising risk of unsustainable patterns of development. Ensuring that sites are financially viability is emphasised, particularly where extensive supporting infrastructure is required.

Oadby and Wigston Borough Council commented that development options in the proximity of the Borough or which would place extra traffic on the A6 will require very careful consideration in the context of the relationship with growth already planned in the Borough to 2026 and development options beyond 2026; additional congestion on the A6 in the Borough and in Leicester City; additional congestion on routes around the A6 (in particular east-west routes, Fosse Park/J21/M1/M69); and impact on countryside and green wedge adjoining Leicester PUA.

Other comments suggest that the development of smaller sites around the Kibworths should not be ruled out as they could be more sustainable/deliverable than an SDA and that development on the scale of an SDA does not reflect the settlements' position in the settlement hierarchy, would not lead to a change in the Kibworths' role or lead to a substantial increase in the level or quality of services for villagers.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. Of the 2 Kibworth SDAs proposed, further assessment of the Kibworth North and East was carried out due to its ability to deliver a by-pass. However, Option 5 has not been taken forward due its potential impacts on the A6 in south east Leicester, longer average journey times in comparison to SDAs at Scraptoft and Lutterworth, its poor relationship to larger employment opportunities, land ownership issues, local infrastructure constraints, and negative impacts on the landscape and built heritage of the village.

Option 6: Lutterworth Strategic Development Area (SDA)

Summary of the Option:

This option has been derived from a proposal that has been received which would provide approximately 1,950 dwellings, local facilities and employment land to the East of Lutterworth by 2031. This would involve provision of a road link between the A4304 (to the east of Lutterworth) and A426 (Leicester Road to the north of Lutterworth) which would provide relief for Lutterworth town centre. In addition, approximately 550 dwellings would be delivered at this location after 2031. There is also scope for provision of a motorway service facility adjoining M1 Junction 20 and land for strategic distribution. Considerable further assessment of transport impact, landscape and viability is needed to test whether it is appropriate for allocation. Delivery of this strategic development area would reduce the requirement for all other settlements in the District.

The proposal for a Lutterworth SDA would deliver approximately 10ha of employment land. Approximately 10ha of employment land would also be delivered in Market Harborough along with approximately 3ha in Fleckney to balance its relatively high potential

housing growth. There would also be additional provision for strategic distribution close to Magna Park, the scale of which is yet to be determined.

Table A5.3f below sets out a summary of the consultation responses received to Option 6 (Lutterworth SDA), highlighting the key issues raised in objection and support of the option.

Table A5.3f: Summary of responses to Option 6 (Lutterworth SDA)

Options Consultation Responses
<p>Number of respondents: 248 Total representations: 270</p> <ul style="list-style-type: none"> • Objecting: 79 • Supporting: 179 • Commenting: 12 <p>Of the 9 options presented, this option attracted:</p> <ul style="list-style-type: none"> • Sixth highest number of respondents; • Seventh highest number of representations; • Lowest number of objections; and • Highest number of supporting representations.
<p>Key issues raised in objections:</p> <p>Approximately 30 representations objecting to the option originated from Lutterworth and the surrounding villages. There were fewer than 10 representations from Lutterworth residents. Cotesbach Parish Council was among the 6 parish councils objecting to the option. It feels that a commitment to preparing a strategic growth plan for Lutterworth is needed as such a plan is critical to the success of the SDA. The potential revenue from the resultant housing, employment land and potential Magna Park rates should be invested into such a plan and the cash used for the town itself. Misterton with Walcote PC is strongly opposed to the allocation of land for the motorway service facilities.</p> <p>Local objections to the option relate to the limited capacity of existing services and facilities; additional traffic, parking and congestion in the town particularly on the A426; an exacerbation of pollution in the town; lack of capacity of the existing retail area; and increased out commuting due to low unemployment rate in the area. Many commented on specific elements of the SDA such as its isolated location to the east of the M1, limited opportunities for connectivity to Lutterworth, its location downwind of traffic fumes/pollution and its reliance on car usage. Given the relief road's critical role in the success of the SDA, there needs to be solid evidence in relation to its benefits for traffic in the area and for the</p>

town in particular. There is a fear that the relief road would not be built for a long time and that Lutterworth, a vehicle oriented town, would become even more congested. The addition of a service station is questioned by respondents and could negate the benefits of a relief road. Its development would extend development too far into open countryside. There is also concern over the possible impacts of potential cumulative developments on the M1 J21 roundabout (Lutterworth SDA/further Magna Park development/service station).

Other opposing comments, mainly from the development industry, include the view that this option focusses too much development in one area; this could impact on the economic and social development of the whole District over the plan period. There is undue reliance on one area that will take too long to deliver. It is claimed that the option is not flexible enough and does not take account of the available housing land supply. Other comments raise issues with the lack of housing target for Broughton Astley and Kibworth and low housing targets for PUA and Market Harborough. Such targets do not reflect the role of these settlements within the hierarchy.

Some respondents felt that the distribution of housing should follow decisions regarding the location of employment provision so as to avoid, as far as is possible, extensive commuting. Others felt that an option of no further development around Magna Park should be considered.

Key issues raised in support:

Over half of the representations in support of this option came from Scraftoft, Thurnby and Bushby and Houghton on the Hill area (108). 37 representations in support came from residents of the Kibworths. Fewer than 10 representations supporting the option came from Lutterworth and the surrounding villages.

Lutterworth Town Council has expressed support for this option contingent on the provision of an eastern bypass and new bridge to the north of the town. It feels that this will allow the separation area to be safeguarded and will bring with it increased vitality of service provision and facilities which would not be the case if development was piecemeal.

10 parish councils and Market Harborough Civic Society supported this option with many of them referring to Lutterworth's sustainability in term of access to the strategic road network and employment opportunities.

Leicestershire County Council, as landowner, strongly supports the delivery of an SDA at Lutterworth as it would make a significant contribution to housing numbers and has the potential to deliver economic and environmental benefits to the town. LCC Education supports the principle from an education perspective as scope for growth at Lutterworth and Fleckney. LCC Economic Growth supports the Lutterworth SDA as the location is a focus for economic growth in the Strategic Economic Plan. However, ensuring that sites are financially viability is emphasised, particularly where extensive supporting infrastructure is required.

Key issues raised in comments:

Natural England has serious concerns over the potential SDA given its proximity to Misterton Marshes SSSI. They consider that it is highly

likely that such development would have significant hydrological and other impacts on the SSSI which could damage or destroy the features for which it is designated.

Alongside its strong opposition to the service station, Misterton with Walcote Parish Council is concerned that housing will be built but not deliver of the eastern bypass and the impact this would have on access into Lutterworth.

LCC Highway Authority comments that Lutterworth's performance in transport sustainability terms is better (re: total vehicle time and total delay) relative to MH, the District and also many other parts of the HMA. However, Strategic Transport Assessment evidence suggests there are off-site impacts (capacity issues on A426 Rugby Road and impacts on M1 J20). Further LLITM modelling work is needed to aid the understanding of potential impacts. There are also concerns over:

- relatively poor walking/cycling links to facilities in Lutterworth and cost of providing improved access;
- public transport through the site;
- potential cost of road with new bridge over M1; and
- cost of mitigating off-site impacts.

Oadby and Wigston Borough Council commented that development options in the proximity of the Borough or which would place extra traffic on the A6 will require very careful consideration in the context of the relationship with growth already planned in the Borough to 2026 and development options beyond 2026; additional congestion on the A6 in the Borough and in Leicester City; additional congestion on routes around the A6 (in particular east-west routes, Fosse Park/J21/M1/M69); and impact on countryside and green wedge adjoining Leicester PUA.

Other comments call into question the viability of the SDA (in particular whether 2,500 homes could fund a link road that includes a bridge over the M1 whilst still providing planning contributions) and promote the role of rural development in complementing a single SDA strategy (by providing shorter term development opportunities thus contributing to the 5 year housing land supply).

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. An SDA to the east of Lutterworth is allocated in the Proposed Submission Local Plan delivering 1500 dwellings within the plan period, together with further growth into the next planning period. It offers the opportunity to locate housing growth where employment opportunities will occur, and to provide a new link road with the potential to remove some through traffic and HGV movements from the centre of Lutterworth thus helping to improve air quality. Policy L1 sets out the requirements that a masterplan for the SDA will need to take into account in order to ensure that the new community is well-planned, with its own sense of place, whilst also benefitting Lutterworth. The policy criteria seek to address issues raised in the Options Consultation comments.

Option 7: Scraftoft/Thurnby SDA and Kibworth SDA

Summary of the Option:

This option would involve two of the proposals for strategic development areas in the District: approximately 1,200 dwellings at the Kibworths; and approximately 1,000 dwellings to the East of Scraftoft / Thurnby. Other settlements would receive limited housing growth.

Approximately 5ha of employment land would be delivered with one of the potential Kibworth SDAs. Approximately 10ha of employment land would also be delivered in Market Harborough, at least 4ha in Lutterworth and approximately 3ha in Fleckney to balance its relatively high potential housing growth. There would also be additional provision for strategic distribution close to Magna Park, the scale of which is yet to be determined.

Table A5.3g below sets out a summary of the consultation responses received to Option 7 (Scraftoft/Thurnby SDA and Kibworth SDA), highlighting the key issues raised in objection and support of the option.

Table A5.3g: Summary of responses to Option 7 (Scraftoft/Thurnby SDA and Kibworth SDA)

Options Consultation Responses
Number of respondents: 355 Total representations: 371 <ul style="list-style-type: none">• Objecting: 335• Supporting: 25• Commenting: 11
Of the 9 options presented, this option attracted: <ul style="list-style-type: none">• Highest number of respondents;• Highest number of representations;• Highest number of objecting comments; and• Lowest number of supporting comments.
Key issues raised in objections:

Residents from the Kibworths' area raised 129 objections to an SDA for the village. Common concerns raised included the lack of infrastructure capacity (particularly schools and GP surgeries), difficult and dangerous access to the A6, traffic congestion within the village itself, increasing noise and pollution levels and lack of shopping facilities/parking in the centre. There was also a feeling that development of an SDA would have an adverse impact on the settlement changing it from an historic village to an unattractive town. Loss of open countryside, wildlife habitat and biodiversity was also raised. Many pointed out the high level of housing development which has taken place over the past few years and the need for the settlement to be allowed time to adjust to this growth. Losing the sense of community was a real concern expressed by many villagers. The viability and the effectiveness of the proposed bypass were questioned by some respondents. Kibworth Beauchamp and Kibworth Harcourt Parish Councils objected to the option, echoing local concerns and the lack of infrastructure capacity assessment and assessment of local need. Nearby Fleckney PC and Burton Overy PC also objected fearing the SDA would change the character and nature of the Kibworths and impact on the countryside.

There were 160 representations from residents of the Scraftoft, Thurnby and Bushby and Houghton on the Hill area opposing an SDA to the east of Scraftoft/Thurnby. Many comments focused on traffic related issues with traffic congestion and speed highlighted with the A47 of particular concern. There was general agreement that the potential link road would not provide benefits to the road network and would create the opportunity for new rat runs through the villages. The lack of capacity of local services and facilities (particularly schools and GP surgeries) was highlighted. Several respondents felt that although the settlements have had a lot of new development in recent years, no improvements to local infrastructure provision have taken place. High levels of current commitments and building in adjacent areas (Keyham Lane, Hamilton and Barkby) also need to be taken into account. Loss of separation, reduced access to the countryside, worsening air pollution and continuing erosion to the character of the villages were also emphasised in comments. There was a general feeling that, although on the edge of the City, the settlements are not a sustainable location for an SDA due to the restricted road network and lack of public transport. Scraftoft and Thurnby & Bushby Parish Councils objected to the option as did nearby Houghton on the Hill PC. Stoughton PC expressed opposition fearing the impact on the local road network between A47 and A6.

A further 7 parish councils opposed this option. In addition Lutterworth Town Council was concerned that under this option the town will not receive the correct level of infrastructure support as development would be delivered in piecemeal fashion.

Some developers/promoters felt that the approach is not flexible enough to deal with market variations and relies on a few areas which will take too long to deliver. Others felt that numbers for villages were too low to support services and allow for rural growth and that the approach does not take into account the evidence in relation to available supply of land.

Some respondents felt that the distribution of housing should follow decisions regarding the location of employment provision so as to avoid, as far as is possible, extensive commuting. Others felt that an option of no further development around Magna Park should be considered.

Key issues raised in support:

Market Harborough Civic Society considered the option set out a more realistic figure for Market Harborough.

Billesdon PC supported the approach of concentrating development in urban areas. Whilst a number of those in support felt that the option set out a more realistic level of development for rural villages.

Key issues raised in comments:

Anglian Water Services Ltd stated that the development of either SDA at Kibworth is expected to require improvements to the foul sewerage network and sewage treatment works.

Leicestershire County Highway Authority has commented on the option as follows:

- Scaptoft /Thurnby SDA: Any proposals for strategic growth here could be limited unless and until a strategy can be put into place to address cumulative traffic issues in the north east of the PUA. The link road might address some local issues but could encourage rat-running of more strategic traffic trying to avoid congestion on the main road network in the north east of the PUA. The viability of this scale of infrastructure would also need to be carefully assessed.
- The Kibworths SDA: Evidence shows that A6 London Road south of the Ring Road is likely to require further attention and investment to 2031. It is already under significant traffic pressures and proposals for strategic growth on or around south eastern edge of PUA will exacerbate these problems. As a result the options for strategic growth in places such as the Kibworths could be limited unless and until a strategy for addressing issues on the south side of the PUA can be put in place. Further LLITM modelling is needed to assess the impacts on the PUA (applies to both SDAs). Substantial on an off site transport infrastructure would be needed to mitigate impacts so there would need to be certainty that developments remained financially viable.
- The relative paucity of strategic transport infrastructure on the south side of the PUA, especially in terms of orbital highway capacity, could mean that it would be extremely difficult to mitigate any overlapping impacts arising from the 2 potential growth areas set out in this option.

Leicestershire County Council Education has commented on the option as follows:

- Kibworth SDA: support the principle from an education perspective of providing a school, maybe an issue at secondary level.
- Scaptoft/Thurnby SDA: support the principle from an education perspective as the proposal is large enough to provide a new school.

Oadby and Wigston Borough Council commented that development options in the proximity of the Borough or which would place extra traffic on the A6 will require very careful consideration in the context of the relationship with growth already planned in the Borough to 2026 and development options beyond 2026; additional congestion on the A6 in the Borough and in Leicester City; additional congestion on routes around the A6 (in particular east-west routes, Fosse Park/J21/M1/M69); and impact on countryside and green wedge adjoining Leicester PUA.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. Option 7 has not been taken forward due to its potential traffic impacts (with both SDAs would impact on south east Leicestershire and Leicester City). Infrastructure constraints have also been identified in relation to the 2 SDAs including waste water treatment facilities, flooding downstream from Scraptoft/Thurnby and secondary education in Kibworth. The Scraptoft/Thurnby SDA was dismissed and a further site north of Scraptoft identified on public sector owned land.

Option 8: Scraptoft/Thurnby SDA and Lutterworth SDA**Summary of the Option:**

This option would involve two of the proposals for strategic development areas in the District: approximately 1,950 dwellings to the East of Lutterworth; and approximately 1,000 dwellings to the East of Scraptoft / Thurnby. Other settlements would receive limited housing growth.

The proposal for a Lutterworth SDA would deliver approximately 10ha of employment land. Approximately 10ha of employment land would also be delivered in Market Harborough and approximately 3ha of employment land in Fleckney to balance its relatively high potential housing growth. There would also be additional provision for strategic distribution close to Magna Park, the scale of which is yet to be determined.

Table A5.3h below sets out a summary of the consultation responses received to Option 8 (Scraptoft/Thurnby SDA and Lutterworth SDA), highlighting the key issues raised in objection and support of the option.

Table A5.3h: Summary of responses to Option 8 (Scraptoft/Thurnby SDA and Lutterworth SDA)

Options Consultation Responses
Number of respondents: 279 Total representations: 295 <ul style="list-style-type: none">• Objecting: 204• Supporting: 77• Commenting: 14

Of the 9 options presented, this option attracted:

- Fourth highest number of respondents;
- Fourth highest number of representations;
- Fourth highest number of objections; and
- Fifth highest number of supporting comments.

Key issues raised in objections:

There were 21 representations from residents of the Lutterworth area objecting to an SDA to the east of the M1. Concerns over additional traffic, parking and congestion around the town and the exacerbation of the existing pollution issues were raised. The A426 and congestion at the Whittle roundabout was a particular focus. Also mentioned were the potential impacts of new development on school capacity, GP surgeries and other town infrastructure including the town centre. Loss of town character was a worry as was the lack of information relating to planned investment in improvements in infrastructure (e.g. pedestrianisation of the town centre) and the lack of an integrated strategic growth plan for the Lutterworth area (Cotesbach PC). It was pointed out that the area already has a high rate of employment meaning that people buying homes will be travelling out of Lutterworth to work. The potential isolation of the SDA to the east of the motorway was raised along with the limited options for sustainable travel methods in the area. Misterton with Walcote PC strongly objects to potential motorway services facilities.

There were 145 objecting comments from residents of the Scraftoft, Thurnby and Bushby to an SDA in their area. The concerns raised echoed those expressed in responses to options 4 and 7. Many focused on traffic related issues with traffic congestion and speed highlighted with the A47 of particular concern. There was general agreement that the potential link road would not provide benefits to the road network and would create the opportunity for new rat runs through the villages. The lack of capacity of local services and facilities (particularly schools and GP surgeries) was highlighted. Several respondents felt that although the settlements have had a lot of new development in recent years, no improvements to local infrastructure provision have taken place. High levels of current commitments and building in adjacent areas (Keyham Lane, Hamilton and Barkby) also need to be taken into account. Loss of separation, reduced access to the countryside, worsening air pollution and continuing erosion to the character of the villages were also emphasised in comments. There was a general feeling that, although on the edge of the City, the settlements are not a sustainable location for an SDA due to the restricted road network and lack of public transport. Scraftoft and Thurnby & Bushby Parish Councils objected to the option. Stoughton PC expressed opposition fearing the impact on the local road network between A47 and A6.

16 objections were received from residents of Houghton on the Hill with concerns over how development on the scale proposed in the option (at proposed SDA and Houghton on the Hill) would impact on the A47 and the increasing threat of coalescence with Thurnby and Bushby expressed.

In addition to the parish councils mentioned above a further 2 opposed this option.

Other objections, mainly from developers/promoters, included the assertion that the approach is not flexible enough to deal with market variations and relies on a few areas which will take too long to deliver. It was felt that not enough in villages to support services and allow for rural growth and that the approach does not take into account the evidence in relation to available supply of land. There was also concern that the option makes no provision for development in Kibworth. This is considered unsound given its size, its role in settlement hierarchy and its services and facilities. Similarly no provision is made for Broughton Astley despite its size, service provision and position in the settlement hierarchy.

Some respondents felt that the distribution of housing should follow decisions regarding the location of employment provision so as to avoid, as far as is possible, extensive commuting. Others felt that an option of no further development around Magna Park should be considered.

Key issues raised in support:

Lutterworth Town Council's support for this option is contingent on the provision of an eastern bypass and a new bridge to the north of the town. The Town Council considers this approach enables the safeguarding of the separation area and will provide increased vitality, better services and facilities than development on a piecemeal basis. In addition 9 parish councils and Market Harborough Civic Society express support for this option.

There was support for the option from the landowner/promotor interests of the 2 potential SDA.

Other comments supporting option 8 originated from across a number of settlements most of which are supporting the lower numbers in their settlement or agreeing that this option locates development in the most sustainable locations. The highest number (18) of supporting comments came from the Kibworths. Fewer than 10 supporting representations came from the Lutterworth area.

Key issues raised in comments:

Natural England is concerned about the Lutterworth SDA given its proximity to the Misterton Marshes SSSI. It is likely that large scale residential development in the area would have significant hydrological and other impacts on the SSSI which could damage or destroy the interest features for which it is notified.

Leicestershire County Highway Authority has commented on the option as follows:

- Scraptoft /Thurnby SDA: any proposals for strategic growth here could be limited unless and until a strategy can be put into place to address cumulative traffic issues in the north east of the PUA. The link road might address some local issues but could encourage rat-running of more strategic traffic trying to avoid congestion on the main road network in the north east of the PUA. The viability of this scale of infrastructure would also need to be carefully assessed.
- The Lutterworth SDA: Lutterworth's performance in transport sustainability terms, relative to Market Harborough, the District and also may

other parts of the Housing Market Area (Leicester and Leicestershire), is better regarding total vehicle time and total delay. However, Strategic Transport Assessment evidence suggests off-site impacts (capacity issues on A426 Rugby Road and impacts on M1 J20). Further LLITM modelling work is needed to aid the understanding of potential impacts. There are also concerns over:

- relatively poor walking/cycling links to facilities in Lutterworth and cost of providing improved access;
 - public transport through the site;
 - potential cost of road with new bridge over M1; and
 - cost of mitigating off-site impacts.
- Overall in comparison to with some other options there would appear to be much less risk of traffic impacts from these two areas of growth over-lapping and causing significant strategic problems.

Leicestershire County Council Education have commented on the option as follows:

- Lutterworth SDA: support the principle from an education perspective as scope for growth at Lutterworth and Fleckney.
- Scraftoft/Thurnby SDA: support the principle from an education perspective as the proposal is large enough to provide a new school.

Oadby and Wigston Borough Council commented that development options in the proximity of the Borough or which would place extra traffic on the A6 will require very careful consideration in the context of the relationship with growth already planned in the Borough to 2026 and development options beyond 2026; additional congestion on the A6 in the Borough and in Leicester City; additional congestion on routes around the A6 (in particular east-west routes, Fosse Park/J21/M1/M69); and impact on countryside and green wedge adjoining Leicester PUA.

2 parish councils have made comments on this option. Misterton with Walcote PC supports sufficient housing to trigger the construction of the eastern bypass but is concerned that if Lutterworth is allocated extra housing without bypass that it may be impossible to travel in and out of Lutterworth. Houghton on the Hill PC accepts that the option sees fewer homes in the village but it is concerned that a lot of new homes will be located in an area (Scraftoft/Thurnby) that has already seen or will see considerable development.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. This Option as consulted on in the Options Consultation (i.e. including a Scraftoft/Thurnby SDA) has not been taken forward. However, following the Options Consultation, the emergence of an alternative viable and deliverable SDA to the north of Scraftoft means that the Proposed Submission Local Plan sets out a strategy similar to Option 8 insofar as it allocates 2 SDAs, one to the east of Lutterworth and one to the north of Scraftoft. The SDAs will deliver 1500 dwellings and 1200 dwellings respectively within the Plan period. The East of Lutterworth SDA will deliver further dwellings beyond 2031.

Option 9: Lutterworth SDA and Kibworth SDA

Summary of the Option:

This option would involve the implementation of two of the proposals for strategic development areas in the District: approximately 1,950 dwellings to the East of Lutterworth; and approximately 1,200 dwellings at the Kibworths. Other settlements would receive limited housing growth.

Approximately 10ha of employment land would be delivered at Lutterworth in conjunction with delivery of the potential Lutterworth SDA. Approximately 5ha of employment land would be delivered at Kibworth in conjunction with one of the potential Kibworth SDAs. A further approximately 10ha of employment land would also be delivered in Market Harborough and approximately 3ha of employment land in Fleckney to balance its potential housing growth. There would also be additional provision for strategic distribution close to Magna Park, the scale of which is yet to be determined.

Table A5.3i below sets out a summary of the consultation responses received to Option 9 (Lutterworth SDA and Kibworth SDA), highlighting the key issues raised in objection and support of the option.

Table A5.3i: Summary of responses to Option 9 (Lutterworth SDA and Kibworth SDA)

Options Consultation Responses
<p>Number of respondents: 331 Total representations: 351</p> <ul style="list-style-type: none">• Objecting: 179• Supporting: 156• Commenting: 16 <p>This option attracted:</p> <ul style="list-style-type: none">• Second highest number of respondents;• Second highest number of representations;• Sixth highest number of objecting comments; and• Next to highest number of supporting comments.

Key issues raised in objections:

The majority of comments (128) objecting to option 9 came from residents of the Kibworths opposing an SDA in the village. Common concerns raised included the lack of infrastructure capacity (particularly schools and GP surgeries), difficult and dangerous access to the A6, traffic congestion within the village itself, increasing noise and pollution levels and lack of shopping facilities/parking in the centre. There was also a feeling that development of an SDA would have an adverse impact on the settlement changing it from an historic village to an unattractive town. Loss of open countryside, agricultural land, wildlife habitat and biodiversity was also raised. Many pointed out the high level of housing development which has taken place over the past few years and the need for the settlement to be allowed time to adjust to this growth. Losing the sense of community was a real concern expressed by many villagers. The viability and the effectiveness of the proposed bypass were questioned by some respondents. Kibworth Beauchamp and Kibworth Harcourt Parish Councils objected to the option, echoing local concerns and the lack of infrastructure capacity assessment and assessment of local need. Nearby Fleckney PC and Burton Overy PC also objected fearing the SDA would change the character and nature of the Kibworths and impact on the countryside.

17 objecting comments were submitted by residents of Lutterworth and surrounding villages in respect of the Lutterworth SDA. Concerns over additional traffic, parking and congestion around the town and the exacerbation of the existing pollution issues were raised. The A426 and congestion at the Whittle roundabout was a particular focus. Also mentioned were the potential impacts of new development on school capacity, GP surgeries and other town infrastructure including the town centre. Loss of town character was a worry as was the lack of information relating to planned investment in improvements in infrastructure (e.g. pedestrianisation of the town centre) and the lack of an integrated strategic growth plan for the Lutterworth area. It was pointed out that the area already has a high rate of employment meaning that people buying homes will be travelling out of Lutterworth to work. The potential isolation of the SDA to the east of the motorway was raised along with the limited options for sustainable travel methods in the area. Misterton with Walcote PC strongly objects to potential motorway services facilities.

Comments from developers/promoters included the assertion that the approach is not flexible enough. Some felt that it is unrealistic and contrary to objectives of sustainable development to focus the vast majority of housing growth in 1 or 2 settlements or within the urban areas only. The approach does not take into account the evidence in relation to available supply of land across the District (including rural areas) and the contribution it could make to affordable housing and investment. Others felt that the option fails to take into account that there is significant scope for future development to be accommodated at the PUA and Market Harborough as the most sustainable locations for development. This is acknowledged in the settlement hierarchy but not reflected in the option. Another commented that the approach is inappropriate as it does not ensure that each settlement receives a sufficient influx of market and affordable dwellings whilst retaining the character of the larger market towns and rural settlements.

Some respondents felt that the distribution of housing should follow decisions regarding the location of employment provision so as to avoid, as far as is possible, extensive commuting. Others felt that an option of no further development around Magna Park should be considered.

Key issues raised in support:

Lutterworth Town Council, 10 parish councils and Market Harborough Civic Society support this option. Lutterworth Town Council supports the option contingent on the provision of an eastern bypass and new bridge to the north of the town. It considers this approach enables the safeguarding of the area of separation whilst providing increased vitality, and better services and facilities that through a piecemeal approach. Ullesthorpe PC suggested that the Lutterworth SDA could be enlarged to accommodate strategic distribution needs. Whilst supporting the option, Market Harborough Civic Society expressed the view that a Kibworth SDA should only go ahead if necessary due to lack of services and infrastructure.

Developers/promoters of the potential SDAs submitted supporting comments.

Other comments supporting option 9 originated from across a number of settlements most of which were supporting lower numbers in their settlement. The highest number (86) came from the Scraftoft, Thurnby and Bushby which sees no development under this option. The option was also supported by Houghton on the Hill (21 reps) due to its relatively low target for the village. There were 4 supporting reps from Lutterworth supporting a more comprehensive/strategic approach to development to deliver community benefits rather than a piecemeal approach to development.

Key issues raised in comments:

Natural England has concerns about the Lutterworth SDA given its proximity to the Misterton Marshes SSSI. It is likely that large scale residential development in the area would have significant hydrological and other impacts on the SSSI which could damage or destroy the interest features for which it is notified.

Anglian Water Services Ltd has commented that the development of either SDA at Kibworth is expected to require improvements to the foul sewerage network and sewage treatment works.

Leicestershire County Highway Authority has commented on the option as follows:

- Lutterworth SDA: Lutterworth's performance in transport sustainability terms, relative to Market Harborough, the District and also may other parts of the Housing Market Area, is better regarding total vehicle time and total delay. However, Strategic Transport Assessment evidence suggests off-site impacts (capacity issues on A426 Rugby Road and impacts on M1 J20). Further LLITM modelling work is needed to aid the understanding of potential impacts. It is also concerned over:
 - relatively poor walking/cycling links to facilities in Lutterworth and cost of providing improved access;
 - public transport through the site;
 - potential cost of road with new bridge over M1; and
 - cost of mitigating off-site impacts.

- The Kibworths SDA: Evidence shows that A6 London Road south of the Ring Road is likely to require further attention and investment to 2031. It is already under significant traffic pressures and proposals for strategic growth on or around south eastern edge of PUA will exacerbate these problems. As a result the options for strategic growth in places such as the Kibworths could be limited unless and until a strategy for addressing issues on the south side of the PUA can be put in place. Further LLITM modelling is needed to assess the impacts on the PUA (applies to both SDAs). Substantial on an off site transport infrastructure would be needed to mitigate impacts so there would need to be certainty that developments remained financially viable.
- In comparison to with some other options there would appear to be much less risk of traffic impacts from these two areas of growth overlapping and causing significant strategic problems.

Leicestershire County Council Education has commented as follows:

- Lutterworth SDA: support the principle from an education perspective as scope for growth at Lutterworth and Fleckney.
- Kibworth SDA: support the principle from an education perspective of providing a school, maybe an issue at secondary level.

Oadby and Wigston Borough Council commented that development options in the proximity of the Borough or which would place extra traffic on the A6 will require very careful consideration in the context of the relationship with growth already planned in the Borough to 2026 and development options beyond 2026; additional congestion on the A6 in the Borough and in Leicester City; additional congestion on routes around the A6 (in particular east-west routes, Fosse Park/J21/M1/M69); and impact on countryside and green wedge adjoining Leicester PUA.

Misterton with Walcote PC supports sufficient housing to trigger construction of the eastern bypass but is concerned that, if Lutterworth is allocated extra housing without a bypass, it may be impossible to travel in and out of Lutterworth.

One developer makes the point that development in Kibworth through an SDA does not allow for smaller scale development on the edge of Kibworth which could be more sustainable and deliverable.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. Option 9 has not been taken forward due to transport and infrastructure impacts. Infrastructure impact on Kibworth secondary school, together with Kibworth SDA impacts on landscape and heritage assets.

Replacement to Limits to Development

As set out in the previous Scoping Consultation (2013), the new Local Plan will replace Limits to Development with a new criteria-based policy to determine planning applications for new housing within and on the edge of settlements. This will replace Limits to

Development which were drawn up during the 1990's and adopted in the previous Local Plan (adopted in 2001) and which are now out of date. The criteria-based policy will provide greater flexibility, be more responsive to local circumstances and provide a more positive approach to managing development in conformity with the National Planning Policy Framework. A number of the criteria are broad in order to ensure that they can be applied to the full range of types of proposals, sites and settlements across the entire District. Additional supporting text will be provided in the pre-submission new Local Plan to give some guidance to the interpretation and implementation of the criteria.

The proposed draft policy was set out in the Options Paper and Question 4 asked for comments on the draft policy. Table 5.3j sets out a summary of the consultation feedback.

Table 5.3j: Summary of responses to proposed criteria based policy to replace Limits to Development

Question 4: Do you have any comments on the proposed criteria based policy to replace Limits to Development?
Summary of Consultation Responses
<p>Number of respondents to question 4: 72 Total representations: 77</p> <ul style="list-style-type: none"> • Objecting: 18 • Supporting:24 • Commenting: 35 <p>In addition there were 9 representations (1 supporting, 4 objecting and 4 commenting) on the 'Development Management' paragraph introducing the Settlement Development policy. These responses are included in the overall analysis of responses below.</p>
<p>Key issues raised in objections:</p> <p>The majority of objections to the Settlement Development policy approach came from members of the public. Most of the 15 objections from residents expressed the view that the criteria based policy would not be applied consistently and would be open to interpretation. In their view Limits to Development, which are used by other Councils, provide much welcomed consistency and certainty. Some raised specific issues such as how local support would be gauged under criterion 2, the need to include reference to Neighbourhood Plans in the policy and reference to maximum walking distances to community facilities. Similar objections were raised by 4 Parish Councils.</p> <p>Market Harborough Civic Society felt that the criteria are too limited to cover the situations that will arise in Market Harborough and other large</p>

settlement and would result in too much uncertainty. It expressed the view that either the boundaries need to be defined in the Local Plan or a Neighbourhood Plan for MH needs to be prepared. Overlooking, access, parking design and open space were thought to be omissions.

There were objecting comments from the development industry in relation to specific criterion. One felt that the policy should refer to the overall 5 year housing land supply position in order to ensure that overall need is being met, not just targets for individual settlements. Criteria in relation to the form and scale of development were considered to be subjective and difficult to judge and in need of more objectivity. Also pointed out was the fact that it is not always possible to retain natural boundaries; retaining and enhancing the qualities of the landscape is unduly restrictive; and criterion 11 and 12 go beyond what the NPPF requirement in relation to Conservation Areas and heritage assets. Criterion 14 (conformity with all other relevant policies within the Plan) was considered to be unnecessary as the Plan must be read as a whole when considering applications.

Key issues raised in support:

The majority (12) of supporting comments originated from developers/agents. They generally feel this policy would offer a more flexible and sophisticated approach than limits to development which can become out of date. However, many felt that identifying more allocations (down to SRV level) alongside the policy would offer greater certainty and meet requirements. Some felt that terms such as 'scale' needed greater clarity. Another made the point that limits to development have the potential to be confusing as Neighbourhood Plans could propose different limits to the Local Plan; neither is it sensible to delegate to Neighbourhood Plans as this could cause a policy vacuum if Neighbourhood Plans fail to come forward. The proposed approach was felt to be more responsive.

There was some support amongst members of the public with 7 supporting representations. One suggested a criterion relating to maintaining and enhancing rights of way. Another felt that criterion 8 should read 'maintain separation' rather than 'prevents coalescence'.

Natural England supported the policy particularly criteria 6, 7, 9, 11 and 12.

No Parish Councils expressed support for this approach.

Key issues raised in comments:

Many of those making comments expressed qualified support for the policy but felt that either additional or amended criteria were needed. Leicester City Transport Strategy Team considered that reference to the inclusion of safe access for cyclists and cycle ways to access services and facilities was needed and that reference to transport should be higher in the list. Sport England wanted to see protecting and securing replacement sport facilities in the criteria. Another respondent felt that impact air pollution should be mentioned.

Criteria 2 was criticised by some developers as being contrary to the NPPF in so far as it is not positively prepared. It was felt that reference to the requirement should reflect that it is a minimum, not a ceiling, and that the need to demonstrate community support goes beyond the requirements of the NPPF. Suggested alternative word was suggested as follows: '*Helps to meet the identified housing target for the*

settlement. Where development would result in the number of completions plus outstanding permissions exceeding the identified target, regard will be given to whether any adverse impacts of doing so would significantly and demonstrably outweigh the benefits'. It was pointed out that reference to community support was unnecessary as valid local objections are already taken into account as material consideration in determining planning applications.

Another developer suggested that adherence to criterion 4 (respects the shape and form of the existing settlement) could preclude development that is acceptable.

Other developers supported the approach providing the Local Plan contains clear allocations. Development meeting all the criteria was felt to be challenging. As regards the level of conformity with the spatial strategy, it was considered that this would be dependent on the Council's ability to demonstrate a 5 year housing land supply. If the Council is unable to demonstrate a 5 year housing land supply, it may be acceptable for development to be delivered earlier or where there is conflict with other policies in the Local Plan (which seek to restrict the supply of development land).

Defining limits to development for the PUA, Market Harborough, Key and Rural Centres was supported by one agent who suggested that this would allow well planned considered schemes to come forward in larger settlement whilst allowing small development to come forward to meet local needs in accordance with para. 55 of the NPPF. In relation to housing targets, one developer questioned whether it is the intention that any shortfall should be made up within the same settlement, arguing that there could be more sustainable sites elsewhere in the District to make up the shortfall.

Leicestershire County Council (Assets) supported the approach in principle but only alongside allocations. Others supported this argument in so far as the Local Plan needs to offer certainty on its housing supply by providing more allocations even down to Rural Centre and Selected Rural Village level.

The Highway Authority expressed support providing there are policies elsewhere in the plan to cover more general highway safety matters. If not then criterion 13 would need to be amended to cover the safeguarding of the safe and satisfactory operation of the wider highway network.

Other respondents comment that the approach is too vague and consistent implementation cannot be guaranteed; by replacing certainty with vagueness, the policy approach loses the element of certainty which is fundamental to planning.

4 Parish Councils commented raising concerns over the precise wording of criteria (should say 'maintain separation' and 'maintain the individual character') and the need to refer to conformity with Neighbourhood Plans.
Historic England welcomed reference to heritage assets in the criteria.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. The Proposed Submission Local Plan includes policy 'GD2 Settlement Development' to replace Limits to Development. This policy sets out the criteria to be taken into account in considering proposals for development within or contiguous with the existing or committed built up areas of settlements down to Selected Rural Village level within the settlement hierarchy. The number of criteria included in the policy has been rationalised to five allowing for a clear policy approach to the enabling of suitable, sustainable development which is in keeping with the character of the settlement concerned. Development in settlements below Selected Rural Village level will not be supported unless to meet an identified local need.

A5.4 Housing in the Countryside

The New Local Plan Options Consultation Paper set out 3 Options for an approach to housing in the countryside (development below Selected Rural Villages in the settlement hierarchy). The total development arising from each of these options will be identified as 'windfall' development to be provided over and above the housing numbers set out in each of the 9 Options. The 3 Options for housing in the countryside are:

Option C1 – Strictly controlling development in the countryside

Under Countryside Option C1 housing development in settlements below Selected Rural Villages would be strictly controlled, including settlements with existing limits to development. Option C1 will ensure development is focused to more sustainable settlements, with access to a range of services and facilities, whilst protecting the integrity of the landscape character and settlement pattern of rural villages and the countryside. Option C1 will enable the provision of new services and facilities in rural settlements to improve sustainability. The NPPF states that planning should manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and Option C1 would support this approach.

Option C2 – Limited infill and Development Management led

Option C2 would allow for limited infill development and conversion of existing buildings to residential use in Sub-Selected Rural Villages. Proposals would be required to meet the relevant criteria set out in the proposed Settlement Development policy to replace Limits to Development. This approach would allow limited infill development in the relevant settlements listed above in addition to appropriate development in the countryside set out in Option C1 above. Such a policy would seek to provide additional support for existing services and facilities and would encourage further provision.

Option C3 – Meeting identified needs

Option C3 would allow for the provision of housing in all smaller settlements below Selected Rural Village level where it helps to meet needs which have been identified locally through community involvement. These needs may be identified through either a neighbourhood plan or through a Rural Housing Needs Survey. This approach could occur in conjunction with either Option C1 or Option C2 above. A neighbourhood plan led approach would enable communities to plan for their area, including providing additional housing development. This additional housing development would be identified to meet local needs, support the long term sustainability of the settlement and may be either infill development or development outside the existing built form, or a combination of both, providing it is adequately justified and consistent with the broad policies of the new Local Plan and the NPPF.

Number of respondents and representations

A total of 106 representations were made on this section as set out in Table A5.4a below.

Table A5.4a: Number of respondents and representations to Housing in the Countryside Options

Paragraph	Respondents	Representations			
		Support	Object	Comment	Total
Option C1	31	25	7	2	34
Option C2	21	8	7	6	21
Option C3 (with C1)	16	7	7	2	16
Option C3 (with C2)	17	9	7	1	17
TOTAL	85	49	28	11	88

Summary:

Overall there was a high level of support for Option C1 for limiting development in the Countryside. This support for Option C1 was generated from residents and Parish Councils, with developers and agents (and 2 Parish Councils) objecting to Option C1. The

level of responses for Options C2 and C3 was very similar, with an almost identical level of representations for supporting and objecting to each Option. Table 5.4b below summarises the representations received against each Option.

Table 5.4b: Summary of Responses to Housing in the Countryside Options

Option C1 – Strictly controlling development in the Countryside
<p>Summary of responses: Overall there was a high level of support for Option C1. This support was solely made up of resident and Parish Council representations, supporting a control of countryside development. Those supporting Option C1 raised the issues of protecting village identity, protecting development boundaries, and protecting green spaces, whilst those objecting to Option C1 proposed that the Option is too prohibitive to development, and may not be compatible with national planning policy.</p> <p>Specific issues raised:</p> <p>Leicestershire County Council commented that bus services are decreasing, and additional growth to countryside settlements will not represent sustainable development.</p> <p>Some agents/developers felt that Option C1 is overly restrictive to development, and not compliant with NPPF para. 28, 54 and 55.</p> <p>Another landowner felt that additional provision should be made for previously development land in the countryside, to allow for residential development / conversion.</p>
Option C2 – Limited infill and Development Management led
<p>Summary of responses: Support for allowing rural settlements to grow, both with infill development and adjacent to boundaries. Policy to support additional service provision is supported and need should be locally evidenced.</p> <p>Specific issues raised</p> <p>One respondent pointed out that Drayton should be removed from the list of sub-SRVs, the village hall has closed.</p>
Option C3 – Meeting locally identified needs

Summary of responses: There was a general split between support and objections to both options within C3 (with C1 or with C2). Support for C3 with C1 was on the basis of limiting development, and allowing neighbourhood plans to propose locally identified need, with support for C3 with C2 allowing for development on a larger scale. Issues were raised regarding settlements that do not wish to undertake a neighbourhood plan, with cost and monitoring/management of neighbourhood plans seen as restrictive, and instead decisions should be made by HDC.

Specific issues raised

None

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. Policy GD4 (New Housing in the Countryside) of the Proposed Submission Local Plan allows for the delivery of housing development of a type which meets evidenced local needs (this evidence could be provided through a rural housing needs survey or a neighbourhood plan). This strategy avoids the overly restrictive approach of option C1 and the risk of too much housing development cumulatively taking place in relatively unsustainable settlements which could result from option C2. Agricultural dwellings will also be supported where they meet set criteria.

A5.5 Affordable Housing

The New Local Plan Options Consultation Paper sets out an approach to affordable housing in the District, with affordable housing delivery a significant pressure.

The proposed approach states that viability assessment work is ongoing to establish a realistic level of affordable housing requirement across all proposed housing sites. This will help to meet affordable housing need whilst ensuring schemes remain viable and deliverable in line with the National Planning Practice Guidance.

The Council will encourage the provision of low cost market housing, together with affordable rent and intermediate housing provision, whilst also supporting the need to provide older persons and retirement housing provision. In addition, neighbourhood plans, based on an identified need, may set targets in excess of those identified in the new Local Plan through local housing needs surveys and may also set parameters for the type and tenure of affordable housing provision to meet local needs.

Number of respondents and representations

A total of 22 representations were made on this section as set out in Table A5.5a.

Table A5.5a: Number of respondents and representations Affordable Housing

Paragraph	Respondents	Representations			
		Support	Object	Comment	Total
Proposed approach	23	6	8	12	26

Summary:

Only comments were invited on the proposed approach to affordable housing provision, as opposed to any support/objection; however representations of support/objections were still made, and equally split. Representations both supported the provision of the current 40%/30% split across the District, whilst querying the deliverability of 40% affordable housing on both small sites and in SDAs. Several representations were made regarding the Council’s lettings process, with support for local identified affordable housing need only, and support was also received for delivery of low cost market housing and starter homes. The following Table A5.5b summarises the representations received.

Table A5.5b: Summary of responses to affordable housing proposed approach

Affordable housing proposed approach
<p>Summary of responses: A preference was made throughout a range of responses for low cost market housing provision, and for starter home provision. Affordable housing to meet local need was also supported, with additional provision for extra care housing and bungalows. Objections raised to the proposed approach included the need for a clearer and more up to date assessment of viability, and the need to set a higher minimum threshold for sites, of 10 or more dwellings only.</p> <p>Specific issues raised:</p> <p>Local residents and Parish Council felt that affordable housing should meet locally identified need only, with a lettings system in place to allow for provision for residents with local connections.</p> <p>Agents/developers considered that any increase in affordable housing provision, together with maintaining a low threshold of site size, will result in small rural sites becoming unviable.</p> <p>Additional provision should be made for extra care and affordable bungalow provision.</p>

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. Policy H2 (Affordable Housing) of the Proposed Submission Local Plan sets out a 40% affordable housing requirement on relevant sites. It also sets out that the tenure split should generally be 75% affordable or socially rented and approximately 25% low cost home ownership products. Local Plan viability work demonstrates that that the required percentage and the mix of tenures are viable. Where proposals do not meet these requirements, the policy requires the applicant to demonstrate to the Council's satisfaction that a different level and mix of affordable housing is necessary to make the proposed development viable. More generally Policy H5 (Housing density, mix and standards) sets out that major housing developments should provide a mix of housing types informed by up to date evidence of housing need.

A5.6 Gypsy and Traveller, and Travelling Showpeople Provision

The New Local Plan Options Consultation Paper sets out the total District requirements for the provision of Gypsies and Traveller and Travelling Showpeople. These are based on the 2013 Gypsy and Traveller Accommodation Assessment (GTAA). The Council currently demonstrates a 0.5yr supply of Gypsy and Traveller sites, and a 3.18yr supply of Travelling Showpeople sites, with net requirements of 70 Gypsy and Traveller pitches to 2031, and 25 Travelling Showpeople plots to 2031.

The new Local Plan will set out a minimum target for the provision of Gypsy and Traveller pitches and Travelling Showpeople plots, as identified in the GTAA. This is recognised as the objectively assessed need for provision within the District. In addition, the provision of transit sites will also be supported.

Previous Calls for Sites for the provision of Gypsy and Travellers and Travelling Showpeople sites have not resulted in any being put forward. However, the Council has received planning applications for additional sites and extensions to existing sites. The new Local Plan will seek to allocate sites and also set out an enabling policy for the development of Gypsy, Traveller and Travelling Showpeople sites.

The Council is currently undertaking both an updated GTAA together with other Leicestershire planning authorities, and undertaking a Site Identification Study for the District. The results of both studies are expected in summer 2016, with the results forming the basis of both target provision, and any potential site allocations.

Number of respondents and representations

A total of 35 representations were made on this section, split into 4 separate sections, as set out in Table A5.6a.

Table A5.6a: Summary of responses to Gypsy and Traveller, and Travelling Showpeople Provision

Paragraph	Respondents	Representations			
		Support	Object	Comment	Total
How many pitches do we need to provide?	14	0	9	6	15
How many plots do we need to provide?	4	1	3	0	4
How will future need be met?	9	0	1	8	9
Do you wish to submit any potential sites?	8	0	0	8	8
Total	35	1	13	22	35

Summary:

No support was received for additional provision of Gypsy and Traveller pitches, with only 1 representation of support for provision of additional Travelling Showpeople plots. The majority of representations were made in relation to provision of pitches/plots in the Lutterworth/Ullesthorpe area of the District, with representations wishing to see the existing sites either capped or reduced in size, and instead provision sought elsewhere in the District. Other proposals included increasing existing sites to meet future needs where these are already established, and that further updated evidence is required. In addition, Leics County Council proposes a target of 20% social rent provision of Gypsy and Traveller sites. Table 24 summarises the representations received against each of the paragraphs.

Table A5.6b: Summary of Responses to Gypsy and Traveller and Travelling Showpeople provision

Gypsy and Traveller and Travelling Showpeople provision
Summary of responses: A preference for no further provision was clear through all comments along with a cap on the existing sites in Lutterworth / Ullesthorpe.
Specific issues raised: Need to use up to date evidence, and increase social provision, aiming for 20% target. Need to have restrictions to any temporary permissions to ensure inappropriate sites are not made permanent. Current provision is concentrated around Lutterworth and Ullesthorpe.
How comments have informed the Proposed Submission Local Plan: Comments have been considered along with further evidence. The Proposed Submission Local Plan at Policy H6 (Gypsy, Traveller and Travelling Showpeople accommodation) allocates sites (subject to meeting set criteria) to contribute to meeting both Gypsy and Traveller and Travelling Showpeople needs. It also sets out the criteria to be taken into account for assessing proposals for new sites and extensions/improvements to existing Gypsy and Traveller/Travelling Showpeople Sites. The level of requirement is set out in up to date evidence provided by the Gypsy and Traveller Accommodation Assessment 2017. In order to identify potential sites to meet these requirement figures the Council undertook a Gypsy, Traveller and Travelling Showpeople Site Identification Study in 2017. Both these documents have informed the policy.

A5.7 Employment

The New Local Plan Options Consultation Paper sets out why the new Local Plan needs to provide additional land for employment uses. Planning positively for the sustainable development of homes and the development needs of business is one of the core planning principles set out in the National Planning Policy Framework. Supporting businesses to enable them to grow and increase skills and training is a Council Priority.

The Council must plan for new jobs and employment land to meet the needs of the District and to support the wider sub-regional economy. In Section 9, the Options Paper sets out the scale of employment land required to 2031 based the most up to date evidence available. It also sets out how the need for new jobs and employment land will be delivered over the plan period. Table

A5.7a sets out a summary of the issues raised in response to establishing how much employment land is needed and how this need will be met.

Table A5.7a: Summary of responses to establishing and meeting employment need paragraphs

<p>Why do we need to provide land for more jobs? How much land do we need to provide? How will provision for new jobs and employment land be met?</p>
<p>Number of respondents: 17 Total representations: 27</p> <ul style="list-style-type: none"> • Objecting: 4 • Supporting: 1 • Commenting: 22
<p>Key issues raised in objections:</p> <p>There was an objection to providing for more jobs based on the fact that the District has low employment and providing more jobs will encourage in commuting bringing traffic and pollution. Another felt that rather than providing land for large international companies it is preferable to support and provide for SMEs.</p> <p>Another respondent considered that the new evidence on the apparent need for more distribution space is so out of line with previous evidence that its validity is questioned and that, if more space is required, it should be spread across the District, not concentrated.</p>
<p>Key issues raised in support:</p> <p>One respondent emphasised the need for employment land and questioned why housing is allowed on land previously in employment use.</p>
<p>Key issues raised in comments:</p> <p>Developers highlighted that there is no option aimed at reducing the level of out-commuting despite draft objective 2; no mention of the 4 Local Enterprise Partnerships which have logistics as a priority in their Strategic Economic Plans; and that the Employment Land Study is out of date and should be updated to ensure jobs target is appropriate. The Employment Land Study was also criticised as it does not present a policy-led scenario to reduce levels of out-commuting and under-estimates the logistics sector forecast needs.</p> <p>Whilst one respondent felt that reliance on jobs in distribution is a mistake as it requires large areas of land but provides low skilled jobs,</p>

another saw that such development offers some economic benefits. The importance of reliable need evidence was referred to.

Leicestershire County Council expressed support for additional employment growth in Lutterworth as it is situated in the SW Leicestershire Priority Growth Area as defined in the Leicester & Leicestershire Strategic Economic Plan 2014-20. It also felt that the suggested oversupply of B1a/b shouldn't prevent new B1 developments coming forward where they represent sustainable development.

One developer felt that there should be more detail on the Council's Open for Business prospectus, and reference to the role of Magna Park. It was also felt that there was an underlying, and unjustified, assumption that strategic distribution is unlikely to be 'sustainable'.

Another respondent referred to the need to improve road communications and that modern business requires good broadband links which much of the District currently lacks. The need for improved transportation of goods traffic with a rail terminal at Magna Park was considered an essential element of providing more jobs.

Lubenham PC felt that farm buildings should be utilised for employment before allocating more land; that the take up of under utilised office space should be encouraged to alleviate the need to travel; and that allocated employment sites should have sufficient parking or public/private bus services to alleviate parking problems.

Again the need to avoid using employment sites for housing was raised. There needs to be a good mix of both housing and employment in all areas.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. Whilst the Proposed Submission Local Plan at Policy SS1 sets out the broad approach to business development in the District, Policy BE1 (Provision of new business development) sets out the scale and distribution of land for new business development over the plan period. This takes into account the Council's economic aspirations, up to date evidence from the Leicester and Leicestershire Housing and Economic Needs Assessment 2017 and the Strategic Employment Land Availability Assessment 2017. The policy provides for a supply of employment land in accordance with the settlement hierarchy and the Local Plan's strategic aims, identifying a minimum amount of land to be provided in or adjoining particular settlements, together with site allocations.

Retaining and protecting existing employment sites

The new Local Plan will set out a strategy to affirm the District's 'Open for Business' prospectus. It will seek to provide a choice of attractive and viable employment sites, particularly industrial sites, across the District. An important element of this is retaining and protecting the most important existing employment areas for ongoing employment use where they are 'fit for purpose', and

relinquishing them where not. The list of existing employment sites proposed to be retained and protected through policy is set out at Appendix F of the Options Paper. Peaker Park and other more recently completed employment sites will be assessed and considered for inclusion. Question 7 of the consultation invited comments on the list of sites to be retained and protected and Table A5.7b summarises the responses.

Table A5.7b: Summary of responses to existing employment sites proposed to be retained and protected through policy

Q7. Do you have any comments on the list of existing employment sites proposed to be retained and protected through policy (set out at Appendix F of Options Consultation Paper)?
<p>Number of respondents: 8 Total representations: 8</p> <ul style="list-style-type: none"> • Objecting: 1 • Supporting: 4 • Commenting: 3
<p>Key issues raised in objections: None</p>
<p>Key issues raised in support:</p> <p>The County Council expressed support for the retention of existing employment allocations, in particular Airfield Farm Business Park (MH), subject to individual sites remaining economically viable / meeting needs without creating conflict with adjoining uses. There was also developer support.</p> <p>Support for the protection and expansion of Magna Park (Phases 1 & 2) and Churchill Way (Fleckney) was also expressed by developer/agent interests.</p>

Key issues raised in comments:

Cotesbach PC called for clarity in relation to a proposed employment site at Shawell.

One agent felt that Arkwright Hill Farm Industrial Estate (Cosby), an existing employment site of 7.76 ha, should be included in Appendix F due to the under-supply of B1,B2 and B8 floor-space.

In view of an oversupply of office space it was suggested that the balance of the allocation at Compass Point Business Park (MH) should be reviewed and a further phase of land released for housing.

There was concern about extensive development of Magna Park without developing the road system, especially the A5.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. Policy BE3 (Existing employment areas) of the Proposed Submission Local Plan identifies Key Employment Areas and General Employment Areas and defines a bespoke policy approach to development within the 2 classifications. The policy approach protects employment areas that are both suitable and viable for continued employment use, helping to prevent the incremental loss of land to other more valuable or profitable land uses and to support economic growth and protect jobs in the District.

Where will new land for employment be provided?

The Options paper at Appendix H set out how new employment land is proposed to be distributed across the District under the 9 options. Table 5.7c summarises the comments received in relation to the proposed distribution options.

Table 5.7c: Summary of responses to proposed distribution of employment land**Where will new land for employment be provided?****Continuing Current Distribution of Development (Options 1 – 3)****Options involving delivery of 1 or 2 Strategic Development Areas (Options 4 – 9)****Number of respondents: 9****Total representations: 9**

- **Objecting: 2**
- **Supporting: 1**
- **Commenting: 6**

Key issues raised in objections:

One respondent questioned the need and/or the demand for additional employment land at Kibworth.

A site-specific policy for the site with planning permission for a crematorium at Great Glen is sought by the landowner.

Key issues raised in support:

None.

Key issues raised in comments:

Anglian Water has indicated that 10ha of employment land at Market Harborough and 5ha at Kibworth may require additional sewerage treatment enhancements and potentially improvements to the foul sewerage network (subject to site location).

Historic England emphasised that the impacts of potential employment development on heritage assets should be assessed.

Leicestershire County Council stated that, in principle, it has no objection to further employment provision in Market Harborough, Lutterworth and Fleckney particularly where it is likely to bring about a better balance between jobs and housing. Potential general employment site allocations need to be reflected in transport modelling work. It also supported the general principle of mixed use development (through SDAs), given the potential to reduce the number of car borne trips generated by the development on the surrounding road network.

Whilst the strength of the evidence for employment land requirements was questioned, others felt that housing should follow employment to avoid extensive commuting and improve sustainability.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. Policy BE1 (Provision of new business development) of the Proposed Submission Local Plan sets out the scale and distribution of land for new business development over the plan period. It seeks to locate new business development close to major new housing allocations in order to improve the balance between jobs and housing, taking into account the Council's economic aspirations and recent evidence provided by the Leicester and Leicestershire Housing and Economic Needs Assessment 2017 and the Strategic Employment Land Availability Assessment 2017. The policy provides for a supply of employment land in accordance with the settlement hierarchy and the Local Plan's strategic aims, identifying a minimum amount of land to be provided in or adjoining particular settlements, together with site allocations.

Potential general employment site allocations

All general employment (non strategic distribution) land needs to 2031 are expected to be provided for through the allocation of sites in either the new Local Plan or in neighbourhood plans. This is to assist in bringing the sites forward and to safeguard them for employment use. Work on assessing the sustainability of sites is still ongoing; however, it is likely that most of the potential general employment sites submitted to the Council (apart from in relation to strategic distribution) will need to be allocated to meet the employment land requirements.

A pool of potential employment sites is set out in the Options Paper at Appendix G and comments were invited on the sites. A summary of the responses received is set out in Table A5.7d.

Table A5.7d: Summary of responses to potential employment site allocations.

Potential general employment site allocations
<p>Number of respondents: 7 Total representations: 8</p> <ul style="list-style-type: none"> • Objecting: 1 • Supporting: 2 • Commenting: 5
<p>Key issues raised in objections:</p> <p>Concern was raised about the potential impact of further industrial and manufacturing jobs on the local road network.</p> <p>There was one objection to development of site E/001LT/11 (Land south of Lutterworth Road/Coventry Road, Lutterworth), such development would set a precedent which would be exploited by major commercial / logistics developers in the future.</p>
<p>Key issues raised in support:</p> <p>Both supporting comments came from landowners promoting their respective sites (land south of Lutterworth Road / Coventry Road, Lutterworth E/001LT/11 and land adjacent to M1/south of Lutterworth Road, Lutterworth E/005LT/11).</p>
<p>Key issues raised in comments:</p> <p>The Highway Authority has indicated that; 'Land at Airfield Farm' should be served from the road infrastructure for the existing Airfield Farm</p>

Business Park; access to site 'land adjacent to M1/South of Lutterworth Road' could be challenging given existing junctions. The traffic impacts of the Lutterworth sites (E005LT/11 and E/001LT/11) could overlap with any other 'general employment allocations' at Lutterworth and any Lutterworth SDA options.

One respondent questioned the strength of the employment land need evidence. Another felt that the argument for another 10ha of employment land at Market Harborough is not presented and that future employment development should achieve much higher aesthetic standards.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. Whilst Policy BE1 (Provision of new business development) identifies sites for business use, there are also detailed policies in Part C (Places and Sites) of the Proposed Submission Local Plan for each allocated site. These policies set out the site specific requirements which development proposals will need to meet. These requirements cover issues such as access arrangements, footpath/cycle path links, transport mitigation, parking provision, flood mitigation, design and layout, and archaeological and ecological assessment.

Site Specific Employment Areas

The New Local Plan Options Consultation Paper set out the proposed approach to Bruntingthorpe Proving Ground and Leicester Airport (Stoughton) in order to positively manage their development within the plan period to 2031. The following section summarises the responses received.

Bruntingthorpe Proving Ground

It is proposed that the new Local Plan will contain a new site allocation policy to manage positively future development at Bruntingthorpe, while protecting local communities from adverse noise and traffic generation. There are no development or policy options at this stage but as part of the ongoing preparation of the new Local Plan for the District, officers of the Council will continue to work with the site owners and representatives of the local community to develop an appropriate local planning policy for inclusion in the Plan. Question 9 of the Options consultation invited comments on the proposed approach and Table A5.7e summarises the responses received.

Table A5.7e: Summary of responses to Bruntingthorpe Proving Ground proposed approach

Question 9: Do you have any comments regarding the proposed policy approach for Bruntingthorpe Proving Ground
<p>Number of respondents: 15 Total representations: 16 Objecting: N/A Supporting: 2 Commenting: 14</p>
<p>Key issues raised:</p> <p>There were various comments, mostly referring to the impact of the Proving Ground on local communities. The need to maintain the safe and effective use of the highway network was raised particularly by the Highway Authority. One comment referred to the site as a nuisance and suggested it be allocated for housing. Another said it should be developed for manufacturing rather than storage. In general the point was made that the Local Plan must help manage future development and ensure present activities are controlled. Some respondents said the area is underused brownfield land with potential for mixed development, so long as the traffic infrastructure is improved. There was general support for such a policy in the Local Plan.</p>
<p>How comments have informed the Proposed Submission Local Plan:</p> <p>Comments have been considered along with further evidence. Policy BE4 (Bruntingthorpe Proving Ground) sets out the approach to development at the Proving Ground to 2031 which balances the requirements of business and issues relating to its rural location. The policy specifies the type of development which will be permitted and the requirements such development proposals will need to meet in order to be acceptable. These requirements include issues such as design, materials, landscape considerations, traffic impacts, highway improvements and access to the site. Restricting the range of permitted uses will help avoid disturbance to nearby residents, protect the rural character of the area and prevent unacceptable impacts on the local rural road network.</p> <p>The policy also sets out the approach to future development within the Bruntingthorpe Industrial Estate with similar safeguards in order to prevent unacceptable impact on the character of the area, the amenity of local residents and the rural road network capacity constraints.</p>

Leicester Airport, Stoughton

It is proposed that the new Local Plan will contain a new site allocation policy to manage positively future development at Leicester Airport and protect local communities from adverse noise, light pollution and traffic generation. There are no development or policy options at this stage but as part of the ongoing preparation of the Local Plan for the District, officers of the Council will work with the site owner and representatives of the local community to develop an appropriate local planning policy for inclusion in the Plan.

Question 10 of the Options consultation invited comments on the proposed approach and Table A5.7f summarises the responses received.

Table A5.7f: Summary of responses to Leicester Airport proposed approach

Question 10: Do you have any comments regarding the proposed policy approach for Leicester Airfield
<p>Number of respondents: 14 Total representations: 14 Objecting: 1 Supporting: 6 Commenting: 7</p>
<p>Key issues raised:</p> <p>There were mixed responses to the principal of a policy which supports additional development at the Airfield. Leicester Airport supports the proposal for a site specific policy which enables additional limited business development. Other representors note that the level of development will be restricted by the access which is from rural roads. Stoughton Parish Council is opposed to further development owing to traffic risk, and note the noise issue from the Go Kart circuit. Leicestershire CC as Highway Authority would wish to see any site allocation policy address the issue of increased use of the Airport and the mitigation measures needed to maintain the safe and efficient operation of the local road network.</p>
<p>How comments have informed the Proposed Submission Local Plan:</p> <p>Comments have been considered along with further evidence. Policy BE5 (Leicester Airport, Stoughton) sets out the approach to development at Leicester Airport to 2031 which balances the requirements of business and issues relating to its rural location. The policy defines the area of Leicester Airport and allows for operational, aviation and ancillary uses and the conversion/re-use of existing permanent buildings within the area.</p> <p>The policy also identifies the area (referred to as the complex North of Gartree Road) where additional development or re-use of existing buildings for business use will be permitted providing they meet specified criteria relating to safety requirements of the airfield, compatibility with the operational use of the airfield, design, potential traffic impacts on local rural road network and residential amenity, preparation of a Travel Plan and maximum size of individual Class B8 use buildings.</p>

A5.8 Green Infrastructure

This section set out the options in relation to the preventing the coalescence of settlements (Question 11) and invited comments on the list of proposed Local Green Space designations (Question 12).

Preventing the coalescence of settlements: Summary of options:

2 suggested policy options were put forward to prevent settlement coalescence while at the same time allowing for sustainable development which does not unduly impact on the separation of settlements. The options presented were as follows:

- **Option G1: Defining Areas of Separation.** Areas of Separation would be defined in areas where the potential risk of settlements merging together is at its greatest. Within these defined areas planning proposals would be assessed on whether they would result in an unacceptable reduction in the physical and visual separation of settlements. Applicants putting forward proposals in these defined areas would need to show they have considered the effect on coalescence and are applying mitigation. The policy would allow for development which does not impact unduly on the separation between settlements; and
- **Option G2: Using a criteria to prevent coalescence across the District, not just specific Areas of Separation.** A specific criterion will be included in the Settlement Development policy which ensures that development on a particular site does not lead to settlements merging or does not undermine the physical and visual separation of settlements. This would be one of a number of criteria aimed at protecting the character of individual settlements. Specific Areas of Separation would not be defined in the new Local Plan under this policy option.

Table A5.8a sets out a summary of the consultation responses received to Options G1 and G2, highlighting the key issues raised in objection and support of the option.

Table A5.8a: Summary of responses to prevention the coalescence of settlements options

Question 11: Which is your preferred option to prevent the coalescence of settlements? Options G1 and G2	
Options Subtitle:	Defining Areas of Separation
Description:	Option G1: Defining specific Areas of Separation Option G2: Using a criteria to prevent coalescence across the District, not just specific Areas of Separation

Options G1 and G2

Number of respondents to option G1: 36

Total representations: 37

Objecting: 2

Supporting: 32

Commenting: 3

Number of respondents to option G2: 26

Total representations: 26

Objecting: 12

Supporting: 14

Commenting: 0

In addition there were a further 21 representations commenting on aspects of the prevention of coalescence section of the Options Consultation Paper.

Key issues raised in objections:

Only 2 objecting comments were received to option G1 (defining Areas of Separation). One considered the approach to be contrary to the NPPF and therefore unjustified. The other considered that such a policy would leave the door open to development.

Option G2 (criteria to prevent coalescence) received a much higher level of objection than G1. There was a feeling that the G2 approach would be very subjective and open to exploitation from developers. Some expressed the view that such an approach would be too generic.

Key issues raised in support:

Option G1 received a relatively high level of support compared to option G2 (32 supporting representations compared with 14). The continued identification of specific Areas of Separation, with an accompanying policy allowing for development which does not impact unduly on the separation between settlements, was considered by some developers/agents to be more flexible and sophisticated than the G2 approach. Some local respondents felt that this approach is logical and more easily understood. It was felt that a broader, undefined policy would dilute this protection. Thurnby and Bushby PC supported keeping Areas of Separation and expressed concern over the erosion of the existing S/T/B Area of Separation.

In supporting this option (G2), many respondents expressed the need for new or extended Areas of Separation. These included:

- A new area between Kibworth Beauchamp and Smeeton Westerby (Kibworth Harcourt PC);
- An extension of the existing area between Lutterworth and Bitteswell;
- A new area between Magna Park and Ullesthorpe;
- A new area between Cotesbach and Magna Park (Cotesbach PC); and
- Enhanced separation between villages and Magna Park (Claybrooke Parva PC).

Comments in support of option G2 included the view that it allows for development proposals to be considered on their own merits, on a case-by-case basis. The view was expressed that this approach is best unless a robust way of defining Areas of Separation can be found.

A couple of respondents supported an approach incorporating both approaches.

Key issues raised in comments:

The point was raised that the policy approach needs to reflect that it is not only maintaining separation between settlement but also industrial/commercial sites.

Sport England commented that separation area could provide opportunities for sport.

Overall there was recognition that the rural character around villages needs to be protected.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. The approach taken forward in the Proposed Submission Local Plan Policy GD6 (Areas of Separation) is the identification of Areas of Separation at Great Bowden/Market Harborough and Bitteswell/Lutterworth/Magna Park, recognising that there are specific development pressures in these areas and local concern over the potential loss of settlement identity. The policy allows for development where it would not compromise the effectiveness of the Area of Separation in protecting the identity and distinctiveness of the settlements. An Area of Separation Review 2017 fed into the identification of suitable Area of Separation boundaries. Other Areas of Separation are identified or coming forward in Neighbourhood Plans. Whilst the Scraftoft Neighbourhood Plan identifies such an area, in light of the proposed Scraftoft North SDA, the Local Plan proposes that this area is incorporated into an amended Leicester/Scraftoft/Bushby Green Wedge, to compensate for the loss of existing Green Wedge. This allows for strategic green space and access to the countryside to be incorporated as growth takes place around Scraftoft and Bushby. This Green Wedge is identified under Policy GD7 (Green Wedges).

The issue of preventing coalescence is dealt with more generally in Policy GD2 (Settlement development) which sets out a criteria to ensure that development 'does not harmfully diminish the physical and/or visual separation of neighbouring settlements'.

Local Green Space: Summary of Approach

Included in the New Local Plan Options Consultation Paper at Appendix J was a list of proposed Local Green Spaces which the Council intends to designate through the Local Plan. The rationale for their designation was also provided as a background document. A summary of the responses to Question 12 (Do you have any comments on the list of proposed Local Green Space?) is set out in Table 5.8b below.

Table 5.8b: Summary of responses to proposed Local Green Space designations

Options Consultation Responses
<p>Number of respondents 31 Total representations: 32 Objecting: 9 Supporting: 8 Commenting: 15</p>
<p>The key issues raised in objections were either the designation of a site that was felt to be incorrect, or the lack of designation of sites that the respondent felt should have been included.</p>
<p>Key issues raised in support: All supporting respondents agreed with the general principle, including Natural England. Supporters also highlighted additional sites.</p>
<p>Key issues raised in comments: In the comments the issue of lack of designation of identified site (5 reps), or corrections to details of sites (2 reps) was raised.</p> <p>Three sites were objected to as not suitable and an appeal hearing was referenced.</p> <p>The issue of public access to private land was highlighted (2 reps).</p> <p>Alternative types of site for designation were suggested (1 rep).</p>
<p>How comments have informed the Proposed Submission Local Plan: Comments have been considered along with further evidence. Areas of Local Green Space are allocated under Policy GI4 (Local Green Space) of the Proposed Submission Local Plan. The policy recognises the particular importance of the designated sites, setting out an approach to ensure their long term protection.</p>

A5.9 Town Centres and Retail

Summary of approach

The suggested approach to Town Centres and Retailing as set out in the New Local Plan Options Consultation Paper is to focus most new shopping development at Market Harborough, while continuing to support limited growth in other towns and village centres. New Local Plan policy relating to town centres will be based on a clear understanding of the new retail floorspace needs, the allocation of sites to meet those needs, the definition of an appropriate town centre and primary shopping area for Market Harborough, the definition of shopping and business areas for the other centres to ensure new development is located in the most appropriate locations and the setting of locally specific thresholds for the requirement of impact assessments.

Included in the New Local Plan Options Consultation were 2 specific questions relating to town centres and retail and these are dealt with in turn below (Tables A5.9a and A5.9b). Table A5.9c sets out comments made to the overall approach to town centres and retailing.

Where should retail and town centre needs be met? (Question 13: Do you have any comments on the potential retail sites?)

The NPPF makes it clear that the Council should understand the scale of new retail floorspace needed over the plan period and allocate a suitable range of sites to meet this need. Vacant shop units may be able to contribute to this need but only to a limited extent, as the Harborough Retail Study 2013 showed that vacancy rates were lower than the national average. Therefore the new Local Plan will need to allocate land for town centre uses and retail needs to 2031. A number of potential retail sites have been identified through the Retail Study 2013 and through local knowledge. These are mainly in Market Harborough. A recent Call for Sites for development failed to attract any retail or other town centre use submissions. The potential sites are identified in Appendix K of the Options Consultation Paper. The deliverability and viability of the sites has not yet been assessed. Where these involve development of existing surface level car parks it is expected that in any redevelopment there will be replacement car parking provision either on site or elsewhere in the town centre. Table A5.9a below summarises the responses to Question 13.

Table A5.9a: Summary of responses to potential retail sites

Question 13: Do you have any comments on the potential retail sites?
<p>Number of respondents 13 Total representations: 13</p> <ul style="list-style-type: none"> • Objecting: 3 • Supporting: 1 • Commenting: 9 • <p>Also incorporates:</p> <ul style="list-style-type: none"> • 2 objections on 'How much retail floorspace is needed to 2031' and 2 comments on 'Where should retail and town centre needs be met?'
<p>Key issues raised in objections:</p> <p>Several respondents felt that not enough retail sites/floorspace is identified for Lutterworth. Potential retail sites and floorspace requirements need to reflect where new housing is to be located. Therefore there should be more for Lutterworth.</p> <p>Market Harborough Civic Society felt that any change to Commons and Springfield Street car parks would spoil town centre and add to traffic congestion. Multi level shopping/car parking would not be appropriate and would be at odds with Conservation Area.</p> <p>Another respondent felt that by allowing large out of town shopping facilities damages independent retailers in town centre.</p> <p>One respondent felt that the supermarkets are concentrated at one end of town leading to congestion. Development of retail site at Clarence St would exacerbate this.</p>
<p>Key issues raised in support:</p> <p>None identified.</p>
<p>Key issues raised in comments:</p> <p>Leics. County Council (Archaeology) highlighted that the sites are within historic core of Market Harborough and Lutterworth. Therefore development would have to have regard to impact on historic environment and archaeological remains.</p> <p>Several respondents were concerned over the potential loss of parking in Market Harborough and the need to include car parking/traffic management in any new development. Retention and provision of car parking and accommodating retail needs within/close to town</p>

centres it the key to maintaining vitality.

Adequate parking in Lutterworth was also raised as an issue given that many travel into the town from villages by car due to poor public transport.

Inadequate provision for Lutterworth, given potential levels of development, was raised again. It was felt that site selection should wait for decisions on the scale and location of new homes and jobs. Changing markets would suggest caution.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. Policy RT1 (Provision of new retail uses) identifies 2 allocations in Market Harborough for retail and town centre uses, namely the Commons Car Park and Land off High Street. The boundaries have been amended from those set out in the Options Consultation. The St Mary's Road site is allocated as for tourism and leisure uses under Policy RT4 (Tourism and leisure). These sites have been identified to contribute to meeting need figures established in Retail Study Update 2017.

In respect of meeting Lutterworth's needs, Policy RT1 sets out that the East of Lutterworth SDA should provide for an element of retail provision in a neighbourhood centre to meet the needs of the expanding community. Further details regarding this neighbourhood centre are set out within Policy L1 East of Lutterworth SDA.

Town Centre and Primary Shopping Area Boundaries (Question 14: Do you have any comments on the suggested Town Centre or Primary Shopping Area boundary for Market Harborough)

The definition of town centre and principal shopping area boundaries helps in ensuring that retail and other town centre uses are located in the most appropriate locations. The Council is keen to strengthen the 'town centre first' principal to the location of retail and town centre uses, meaning that wherever possible new development should be located in or as close to the town centre as possible.

In order to ensure that retail development and other town centre uses are directed to the most appropriate areas of Market Harborough, the intention is to define both a town centre and a primary shopping area for the town in the new Local Plan. The primary shopping area will serve as the preferred location for retail development and the town centre boundary will be the preferred location for other main town centre uses such as leisure and offices. Question 14 invited comments on these proposed designation boundaries which will help in the application of the sequential test (the aim of which is to identify whether there are preferable sites

in primary shopping areas or town centres for the development proposed). Table A5.9b below sets out a summary of the responses received to Question 14.

Table A5.9b: Summary of responses to the proposed Town Centre and Primary Shopping Area boundaries for Market Harborough

Question 14: Do you have any comments on the suggested town centre or primary shopping area boundaries?
<p>Number of respondents: 7 Total representations: 7</p> <ul style="list-style-type: none"> • Objecting: 3 • Supporting: 1 • Commenting: 3
<p>Key issues raised in objections: A commitment to improved Lutterworth town centre planning needed if SDA is approved.</p>
<p>Key issues raised in support: The MH Civic Society supported the proposed MH town centre shopping boundary.</p>
<p>Key issues raised in comments: Leics. County Council (Archaeology) highlighted that any development within historic core of MH and Lutterworth should have to have regard to impact on historic environment and archaeological remains.</p> <p>Historic England emphasised that policies for town centres can assist in delivering a positive strategy for the conservation and enjoyment of the historic environment and felt that the Council should consider detailed issues such as shop fronts and use of upper floors.</p>
<p>How comments have informed the Proposed Submission Local Plan: Comments have been considered along with further evidence. Policy RT2 (Town and local centres) of the Proposed Submission Local Plan sets out a more focused primary shopping area for Market Harborough than that consulted on. The aim of this is to ensure that retail uses within this area are not diluted by too many non-retail uses which detract from the compact nature of the retail offer. RT2 also defines town and local centre boundaries (Market Harborough, Lutterworth, Kibworth Beauchamp, Fleckney and Great Glen) to ensure that the ‘town centre first’ approach can be applied through the Sequential Test and where necessary an Impact Assessment.</p>

Table A5.9c: Summary of responses to new Local Plan approach to town centres and retailing

Proposed new Local Plan policy approach to town centres and retailing
<p>Number of respondents: 5 Total representations: 5</p> <ul style="list-style-type: none"> • Objecting: 0 • Supporting: 3 • Commenting: 2
<p>Key issues raised in support:</p> <p>One respondent expressed support providing but felt that the Council should consider eliminating car parking charges and provide new and improved car parks along with a relief road to encircle the town. Another felt that the congested High Street is already threatening attractiveness of MH. Focus should be on improving shopping experience (independent shops). An even lower threshold for out of town development (retail impact assessments) would be better.</p> <p>County Highway Authority generally supported the principles of the suggested approach.</p>
<p>Key issues raised in comments</p> <p>Lubenham PC felt that rural communities outside MH may wish to accommodate retail facilities for food and community shops and that any policy should incorporate this.</p>
<p>How comments have informed the Proposed Submission Local Plan:</p> <p>Comments have been considered along with further evidence. The overall approach set out in the retail policies is to focus most new retail development in Market Harborough while continuing to support limited growth in other town and local centres and ensuring that new communities within SDAs have access to local convenience (food) shops to aid sustainability and prevent unnecessary car journeys. Policy HC3 (Public houses, post offices and village shops) supports the development of new village stores and seeks to prevent the loss of existing shopping provision in village.</p>

A5.10 Infrastructure Planning

Section 12 of the New Local Plan Options Consultation acknowledged that infrastructure planning is an essential part of the Local Plan process. The new Local Plan will contain an Infrastructure Delivery Plan (IDP) to identify future infrastructure needs for the District and detail where possible the costs, means of funding and timetable of infrastructure provision. This IDP is currently being prepared and will help to ensure that any infrastructure needs arising from new development are met. This might be either through providing new infrastructure (such as new schools) or by increasing the capacity of existing infrastructure (such as by providing an extra classroom at an existing school). The emerging IDP will form an important element of the new Local Plan at both pre-submission and submission stages of the preparation of the plan. Comments on the IDP will be invited at the pre-submission consultation stage. In its final form, the IDP will ensure that infrastructure is delivered in a timely fashion, whilst ensuring that its requirements will not prejudice the viability of the planned development.

The Options Consultation Paper highlighted the process for involving service and utility providers in the development of the New Local Plan. Comments were invited on the approach to infrastructure planning. A breakdown of comments received is set out in Table A5.10a.

Table A5.10a: Summary of responses to the Infrastructure Planning section

Infrastructure Planning (no Options were consulted upon)
Number of respondents: 14 Total representations: 14 Objecting: 0 Supporting: 5 Commenting: 9
Key issues raised in support: Supporting responses welcomed the proposal to include a policy on infrastructure planning. Suggestions for types of infrastructure to be covered by such a policy were: education, healthcare, police, highways, broadband with fibre optics and green infrastructure (suggested by Natural England). One response mentioned the timing of infrastructure provision, suggesting it should come before new development starts, not upon completion.

Key issues raised in comments:

The following suggestions were made for further infrastructure-related policies:

- a policy on telecommunications development (Mobile Operators Association)
- a site specific policy on the crematorium site at Great Glen (Co-operative Group)
- a specific policy, which requires applicants to:
 - demonstrate that there is capacity or capacity can be made within the foul sewerage network to accommodate the proposed development and;
 - use of SuDs is required unless it can be demonstrated by applicant that this is not feasible (Anglian Water Services)

Sport England reminded us that NPPF para 73 requires LAs to undertake an assessment of sport and recreation needs.

Two respondents (including Cotesbach PC) reiterated the need for any potential SDA at Lutterworth East to be well-integrated with Lutterworth and the need for better retail, leisure, recreational amenities, public space, roads and air quality improvements.

A developer commented on viability, making the point that infrastructure and affordable housing requirements must be assessed to ensure that requirements do not threaten the economic viability of development.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. Policies IN1 – IN4 of the Proposed Submission Local Plan cover issues related to the provision of infrastructure. IN1 sets the framework for direct provision and/or financial contributions to the provision of infrastructure whilst the other policies set out the approach to sustainable transport (IN2), electronic connectivity (IN3) and water resources and services (IN4). Policies relating to allocated sites (see Part C of the Proposed Submission) set out site specific infrastructure requirements. The Local Plan places high importance on the necessary infrastructure being in place, or being in place when needed, to support development. The Harborough Infrastructure Delivery Plan has been prepared alongside the Local Plan and identifies the need for new infrastructure to support new development. This document will be updated regularly in light of changing circumstances, new information, government guidance and funding/investment sources. The preparation of the Local Plan has been informed by a Local Plan Viability Assessment 2017 to ensure that overall the provisions/policies of the Plan are generally viable.

A5.11 Settlement Sections

Section 13 of the New local Plan Options Consultation Paper provides an explanation of the implications of the 9 alternative growth Options on individual settlements. The amount of housing proposed for the settlement under each of 9 options is compared. Then the potential benefits and issues that may result from the Options at the settlement level are outlined.

The main issues arising from responses to this section are summarised in Table A5.11a.

Table A5.11a: Summary responses to Settlement Sections

<p>Scraptoft, Thurnby and Bushby 2 representations (2 objecting)</p>
<p>Development should be spread across the District with each settlement taking its share. This will destroy what identify is left. Road network incapable of taking pressure of another 1000 households and local infrastructure does not have the capacity to cope. It will reduce access to countryside.</p>
<p>Market Harborough 7 representations (3 objecting, 1 supporting, 3 commenting)</p>
<p>No more development to west of Farndon Fields as roads are inadequate and housing sites on edge of MH should be decided in conjunction with relevant PCs and through NPs where relevant. No more employment development at Airfield Farm until current highways issues addressed. Close to a school and a weight restricted road (Lubenham PC)</p>
<p>Lutterworth 1 representation (1 commenting)</p>
<p>Should seek to encourage limited highly technical companies to provide good employment attracting more graduates and highly qualified engineers. This area does not need to become the low paid, low skilled capital of the region.</p>
<p>Broughton Astley 1 representation (1 objecting)</p>
<p>Developer objection to no further housing numbers being provided in the New Local Plan for Broughton Astley. It is considered that land could be identified for safeguarding for future development in the New Local Plan post 2031. By safeguarding land for future development, the New Local Plan would be planning positively in accordance with the NPPF.</p>
<p>Billesdon 5 representations (2 supporting, 1 objecting, 2 commenting)</p>

Ongoing changes to service functions need to be taken into account (e.g. Billesdon has lost its garage and is likely to lose its post office and fire station in near future). Services in village cannot cope with more development than set out in neighbourhood Plan.

Developer view that village has been overlooked re: housing numbers in options. Whilst figure of 59 in Option 1 is welcomed other option numbers should be increased to sustain permitted development and existing facilities.

Fleckney

2 representations (1 supporting, 1 commenting)

Developer support for upper end of growth of village supported along with allocation of land at Arnesby Road.

Great Glen

1 representation (1 commenting)

Developer of view that Great Glen could accommodate Option 1 (166 dwgs) figure given its service provision and land availability. It would expand services, invest in local infrastructure and increase supply of both market and affordable homes.

Houghton on the Hill

3 representations (1 objecting, 2 commenting)

Developer of the view that the lack of completions and commitments in Houghton on the Hill over the past five years is particularly concerning when you consider its relatively high house prices and lack of affordable housing. The village also has a sufficient level of services to accommodate further housing growth and should therefore be making notable contribution to the Council's five year housing land supply shortfall.

Too many houses proposed. It will damage village community character. Only small developments should be allowed. Development must be in line with developing NP.

Husbands Bosworth

1 representation (1 commenting)

Leics. County Council state that the level of housing could be affected by the primary school's capacity and the fact that it is constrained in terms of expansion. The Local Plan should reflect the potential for the County Council's site at Welford Road to be developed in part for a new school, with the remainder of the site and the existing school site to be developed for housing.

The Kibworths

4 representations (1 supporting, 1 objecting, 2 commenting)

Objection due to lack of infrastructure capacity.

Developer acknowledges positive summary for the Kibworths at 218 and supports additional growth. However, ruling out additional housing in options 3, 4, 6 and 8 is considered contrary to aims of vision and settlement hierarchy. Option 1 figure should be considered a minimum level.

Ullesthorpe

7 representations (1 supporting, 2 objecting, 4 commenting)

The level of housing proposed even under Option 1 (54 dwellings) would not be harmful to the settlement and has the potential to improve existing services and facilities and support and enhance local shops and services (LCC).

Stricter control is needed given current commitments and pressure of services. Impact on landscape/conservation area would be permanently negative. House building should be more fairly and evenly distributed, including 'affordable housing'. Planning should encourage all villages to build a percentage to be decided, encouraging them to remain or become more vibrant and living villages.

Selected Rural Villages

19 representations (6 supporting, 5 objecting, 8 commenting)

Professional and comprehensive housing needs survey for rural areas is needed.

Developer view that Stoughton should be an SRV as opportunities for infill/extensions.

If objective 7 to be met development in SRVs should be strictly controlled, meeting only local housing needs.

Developer view that Great Bowden should be Rural Centre and more housing allocated to it. 171 home seekers have put GB as one of their areas of preference. Local view that it is critical that GB stays as an SRV and not subsumed into MH.

No account taken of provision of services nearby – improved public transport links could improve access to these.

Support for Great Easton as an SRV (plus standard responses from 113 respondents).

Developer commented that the range of growth options for each of the Selected Rural Villages is welcomed and contributes to ensuring that LP "should make clear what is intended to happen in the area over the life of the plan, where and when this will occur and how it will be delivered".

Development seems developer driven preferences (large houses) and does little to address housing shortage.

Claybrooke Magna does not meet criteria for SRV.

How comments have informed the Proposed Submission Local Plan:

Comments have been considered along with further evidence. The Proposed Submission Local Plan proposes adjustments to Settlement Hierarchy in order to deliver development across the District to 2031 including:

- Reference to Market Harborough's higher levels of employment, services and facilities and access to sustainable modes of transport to distinguish it from the Key Centres;
- Houghton on the Hill as Rural Centre;
- Joint Selected Rural Villages identified where a primary school is shared and is within safe walking distance (The Claybrookes, Church and East Langton, and Great Easton with Bringhurst);
- Minimum of 400 households criteria introduced for Rural Centres;
- Minimum of 100 households criteria introduced for Selected Rural Villages; and

Great Bowden and Great Easton with Bringhurst not proposed as Rural Centres based on relationship to Market Harborough and new household number criteria respectively.

Appendix 6: Options Consultation Paper Summary of Representations on Strategic Distribution options

- A6.1 Provision for Strategic Distribution
- A6.2 Assessment of Impacts of Strategic Distribution
- A6.3 Strategic Distribution Proposed Options

A6.1 Provision for Strategic Distribution (Section 9)

The New Local Plan Options Consultation Paper sets out why the new Local Plan needs to provide additional land for strategic distribution (large warehouses). Planning positively for the sustainable development of homes and the development needs of business is one of the core planning principles set out in the National Planning Policy Framework. Supporting businesses to enable them to grow and increase skills and training is a Council Priority. Objective 2 of the Local Plan seeks to promote sustainable economic development by fostering new local enterprise and helping to create more jobs; which meet local employment needs, reduce the need for out-commuting and help to increase the sustainability and self-containment of communities.

The Plan's policies must support existing business sectors, taking account of whether they are expanding or contracting (NPPF para 21), and plan for new jobs and employment land to meet the needs of the District and to support the wider sub-regional economy. In Section 9, the Options Paper set out the scale of strategic distribution land required to 2031 based the most up to date evidence available. It also set out options for the proposed contribution of Harborough district to delivering land over the plan period. Table A6.1a sets out a summary of the issues raised in response to the scale of need for land for strategic distribution and how this need will be met.

Table A6.1a: Summary of responses to provision for strategic distribution paragraphs

Provision for strategic distribution (Strategic Distribution Options A-C)
Number of respondents: 23 Total representations: 36 <ul style="list-style-type: none">• Objecting: 13• Supporting: 0• Commenting: 23
Key issues raised in objections: In general objectors each raised multiple and largely different issues, however those concerns mentioned by more than 1 respondent include that; any expansion of large warehouses would be contrary to CS policy / LP Objectives to minimise pollution and reduce carbon emissions, forecast need for the sector is overstated, options (being road-based) take no account of National policy to ensure major releases of land for warehouses are rail-linked, and that any provision would compete & potentially undermine the delivery of other rail-served centres. Several respondents suggested that no further development at or near Magna Park should be allowed (for multiple reasons) and that other sites

should be considered (within / outside the district) in accordance with the Duty to Cooperate on strategic issues.

Objections raised by developers focus on points either for or against the case for rail-served or road-based provision, depending on their particular interests, and raise issue on the extent of any cross boundary discussions about growth (quantum and location).

Other individual matters raised include concern over the dismissal of a 'no expansion' option, the tailoring of options to developers proposals, that proposed options conflict with current development plan & revoked RSS policy which did not identify Magna Park as a preference for growth, and that improvements to road infrastructure are needed before any expansion.

Key issues raised in comments:

Comments were predominantly made by 3 key developers, LCC, another Local Authority and a small number of individuals each of which raised multiple issues with little overlap. Issues can be grouped as relating to;

Specific matters of fact, completeness or accuracy in the description of Option A, B and C or misdirection in the presentation of options relative to each other (e.g. in terms of size, contribution to forecast need, function as an extension, timing of provision, continuity of supply) which mean the public can't consider or respond to options effectively.

The approach to formulating alternative options and their explanation – the lack of an account of up to date evidence, that the SDSS (2014) should be given greater evidential weight than the L&L ELS 2013, that HDC needs to properly assess high / medium and low options for growth as the SDSS doesn't give a district share of forecast need for good reason, and concern that further collaborative work recommended by the SDSS hasn't been done. Two developers point out that flexibility (as per NPPF para 21) needs to apply to large warehouses and that the Local Plan must allow for unanticipated change. Support is expressed for making additional land provision, and that a 'do nothing' approach would conflict with both evidence and the NPPF. LCC comment that the 3 options represent significant expansion to the existing Magna Park.

Approach to site selection – single commenters each suggest that all alternative site option needs to be fully considered to ensure the Plan provides choice to the market, that land at the proposed Lutterworth East SDA (M1 J20) could make a contribution to meeting need, and that provision at Magna Park (in 1 location) seems sensible but that housing is needed as well to reduce travelling.

Case for high growth- a developer commented that this could be beneficial in reducing out-commuting from the district, and that Harborough has every reason to contribute to the LLEP's strategic priorities for growth and the job targets of adjoining areas. Option C proposes further (beneficial) uses not mentioned by the OCP which are made feasible by the scale of growth, and that single management (by a long term owner / developer) is a critical evidential point in its favour.

Case against growth- individual respondent's state that the Core Strategy doesn't support any expansion of Magna Park, and that there is a

mismatch between the general high calibre of the resident workforce and the low skilled nature of jobs in the sector.

Potential effects of particular options- LCC commented that the effects of each option on Lutterworth and the A5 need to be thoroughly considered, together with potential interactions with (Housing & Employment) Options 6, 8, and 9. An adjacent LA (non Leicestershire) commented that the choice of option should consider the allocation of 42ha at M1 J16 and the role of DIRFT (incl. Phase 3) in terms of both the need for additional floor-space and impact on the labour market. Options likely to meet the job needs of adjacent areas should have regard to labour market circumstances and the employment commitments of those districts (i.e. Rugby / Daventry).

Sector statements – LCC comment that the 3 options represent significant expansion to the existing Magna Park. The options recognise the importance of the sector to the Leicester & Leicestershire economy.

A6.2 Assessment of Impacts of Strategic Distribution

The Options Consultation Paper indicated that any option to provide land for strategic distribution will require further assessment in terms of potential impact and benefits, and that the potential for both may be greater if delivered under a spatial strategy for higher levels of growth or a SDA at Lutterworth.

Table A6.2a: Summary of responses to assessment of impacts of strategic distribution options

Impacts of strategic distribution options
<p>Number of respondents: 6 Total representations: 8</p> <ul style="list-style-type: none"> • Objecting: 3 • Supporting: 0 • Commenting: 5
<p>Key issues raised in objections: Three objectors suggested that there is no need to provide additional land for large warehouses, another suggested that options are available elsewhere (e.g. Crick, Leicester Forest East, East Midlands Gateway).</p>

Key issues raised in comments:

The County Council has indicated that the Strategic Traffic Assessment (STA) of 'plus Magna Park' scenario's highlights the potential link capacity issues in combination with Housing & Employment options 6, 8 and 9. It's noted that further detailed assessment is needed, and unless and until this is completed the Highways Authority has no further comment to make.

A developer has commented that;

- HDC is obliged to meet the needs of businesses in its area, with joint working to meet development requirements that cannot be wholly met within the district. A narrow approach to matters of strategic consequence that extend beyond district boundaries is contrary to the NPPF.
- there are 3 tests of what constitutes sustainable development and HDC is obliged to pursue gains jointly and simultaneously across all three; environmental, social and economic
- Harborough is obliged to take account of the Strategic Economic Plans of 4 Local Enterprise Partnerships covering the large warehousing market.

One respondent emphasised that the assessment of need should take into account neighbouring areas, with rail led provision a priority.

A6.3 Strategic Distribution Proposed Options

Paragraph 133-136 of Section 9 of the Options Paper sets out 3 alternative options for delivering land for large warehouses (road-served only) adjoining Magna Park to help contribute to meeting forecast need for Leicester & Leicestershire to 2031. Table A6.3a below sets out a summary of the issues raised on the principle of providing more land. Tables A6.3b, c and d below set out a summary of the issues raised in respect of each individual option A, B and C respectively. The number of respondents to each specific option is broadly similar, and there is significant commonality in the comments made and issues raised for all options.

Table A6.3a below lists additional site/s promoted for strategic distribution development via the consultation.

Table A6.3a: Summary of responses to proposed options for strategic distribution

<p>Q8. We'd like to know which Strategic Distribution Option(s) you favour.</p>
<p>Number of respondents: 38 Total representations: 39</p> <ul style="list-style-type: none"> • Objecting: 26 • Supporting: 3 • Commenting: 9
<p>Key issues raised in objections:</p> <p>Two objectors emphasised that the options are developer led and will result in the over provision of land.</p> <p>The majority of respondents (20) objected to all options and by implication don't support expansion at all, suggesting that it will be detrimental to surrounding villages and residents. Amongst those objecting a wide range of concerns were expressed the most frequent being; traffic impact (12), the effects of air pollution on surrounding villages & Lutterworth (7), lack of employment need and benefit to residents (5), the impact of noise pollution (4), the impact of light pollution (4), loss of agricultural land (3).</p> <p>Individual respondents also highlighted concerns regarding; the increase / impact of HGV's, loss and impact on wildlife, the landscape and archaeological assets, the lack of public transport links, and that Option A would be the start of further development.</p> <p>Two objectors including a developer re-iterated comments that the options take no account of policy to ensure that land for large warehouses is rail-served, or the potential to develop rail-served sites is not compromised. Further that the options have the potential to undermine the delivery of a nationally significant infrastructure project (proposed M1 J20a), and that cross-boundary co-operation regarding the quantum of growth has not been undertaken.</p>
<p>Key issues raised in support:</p> <p>A developer asserted that there is an under-supply of non-rail served strategic distribution sites in the district, and suggested a more dispersed spatial strategy that is not limited to areas adjoining Magna Park. Developers own site (Shawell Quarry) noted as unlikely to be suitable for large B8, requested inclusion in Plan for general employment use instead.</p>

Key issues raised in comments:

LCC expressed concern about the impact of Options A and B on heritage assets, particularly the setting & archaeological remains at Bittesby and landscape and settlement character. Impact on the wider landscape including the setting of Ullesthorpe, Claybrooke Parva and Cotesbach Conservation Areas, and effects on local heritage.

The Environment Agency commented that all new development should be steered away from areas of flood risk, noting both Options A and B are affected by flood zones.

Strategic Distribution - Option A

The OCP states that Option A will provide approximately 37ha of land, delivering up to 100,844 m² for strategic distribution development, located at and adjacent to Magna Park.

Table A6.3b: Summary of responses to proposed Strategic Distribution - Option A

Q8. We'd like to know which Strategic Distribution Option(s) you favour.

Strategic Distribution – Option A

Number of respondents: 85

Total representations: 89

- **Objecting: 85**
- **Supporting: 3**
- **Commenting: 1**

Key issues raised in objections:

In general objectors raised multiple and similar issues about Option A. Objections were most commonly based on concerns about ; increased traffic impact on local villages (69), increased air pollution (43), loss of agricultural / greenfield land (31), increased HGV movements through Lutterworth / villages (22), the lack of employment benefit to residents (20), and increased noise pollution (20).

Less frequently cited concerns included; increased light pollution, the lack of public transport, impact on wildlife and uncertainty of ownership &

<p>the effect on data on which forecasts are based. Other notable issues raised by individuals included; concern over the low skilled /paid nature of jobs created and fit with need for higher skilled / valued jobs, and a lack of parking provision.</p> <p>A total of 16 objectors commented that there are other more suitable locations (the majority giving examples outside the district) available for accommodating large warehousing growth in Leicester & Leicestershire.</p>
<p>Key issues raised in support:</p> <p>Two supporters indicated that Option A is preferred, another that an allocation to the south of Magna Park is preferred.</p>
<p>Key issues raised in comments:</p> <p>A developer commented that; Option A does not provide for the required scale or flexibility of development as per the L&LSDSS and does not provide enough floor-space for the Council to benefit from economic opportunities to 2031. Further that Option A does not offer a choice of locations for investment or occupiers.</p>

Strategic Distribution - Option B

The OCP states that Option will provide another distribution park to the south of Magna Park, with up to 278,709 m2 of storage and distribution floor-space on a site of approximately 89ha.

Table 6.3c: Summary of responses to proposed Strategic Distribution - Option B

<p>Q8. We'd like to know which Strategic Distribution Option(s) you favour.</p> <p>Strategic Distribution – Option B</p>
<p>Number of respondents: 79</p> <p>Total representations: 84</p> <ul style="list-style-type: none"> • Objecting: 78 • Supporting: 5 • Commenting: 1

Key issues raised in objections:

In general objectors raised multiple and similar issues about Option B. Objections were most commonly based on concerns about ; increased traffic impact on local villages (35), increased air pollution (34), loss of agricultural / greenfield land (25), the lack of employment benefit to residents (22), increased HGV movements through Lutterworth / villages (19).

Less frequently cited concerns included; increased light pollution, increased noise pollution, impact on wildlife, the lack of public transport, and concern over the low skilled /paid nature of jobs created and fit locally with need for higher skilled / valued jobs.

Again, a total of 23 objectors commented that there are other more suitable locations (the majority giving examples outside the district) available for accommodating large warehousing growth in Leicester & Leicestershire.

Key issues raised in support:

A developer (the promoter of Option B) expressed support for this option being the minimum level of growth that should be provided for, indicating that it responds to need, and is well located to the strategic highway network. It was also stated that the location / site is unconstrained and could provide flexibility once the final scale of growth over the plan period has been quantified. A shortage of accommodation / lack of Tier 1 buildings, the combined demands of logistics and the supply chain for manufacturing, the broad range of employment opportunities and the assertion that the sector is a major provider of apprenticeships were cited as factors in support of Option B.

Three supporters cited that Option B intrudes less in to open countryside, as their reason for support. A further 2 considered B the most logical option for growth.

Key issues raised in comments:

A single respondent suggested that a 4th option of 'No expansion at or close to Magna Park' should be considered.

Strategic Distribution - Option C

The OCP states that Option C will enable a substantial expansion of the existing Magna Park, by providing up to 500,000 m² of strategic distribution floor-space on 220ha land.

Table 6.3d: Summary of responses to proposed Strategic Distribution - Option C

<p>Q8. We'd like to know which Strategic Distribution Option(s) you favour. Strategic Distribution – Option C</p>
<p>Number of respondents: 80 Total representations: 82</p> <ul style="list-style-type: none"> • Objecting: 79 • Supporting: 1 • Commenting: 2
<p>Key issues raised in objections:</p> <p>In general objectors raised multiple and similar issues about Option C. Objections were most commonly based on concerns about ; increased traffic impact on local villages (45), increased air pollution (40), loss of agricultural / greenfield land including that the proposed Country Park is a poor replacement (38), the lack of employment benefit to residents (23), increased HGV movements through Lutterworth / villages (22). Those concerned about traffic impact identified settlements within and outside the district where effects would be increased including; Lutterworth, Bitteswell, the Claybrookes, Ullesthorpe, Cotesbach, Wibtoft and Pailton.</p> <p>Less frequently cited concerns included; increased light pollution, increased noise pollution, impact on wildlife, the lack of public transport, concern over increased in-commuters travelling by car being not sustainable, concern over the low skilled /paid nature of jobs created and fit locally with need for higher skilled / valued jobs and concern over the impact on heritage assets. In general the number of respondents raising these lesser issues was slightly higher than for either option A or B.</p> <p>In addition a significant number of objectors gave reasons for their objection including that; this type of development should be cited at motorway junctions / rail-heads and on brownfield sites in areas of employment need (19), the forecast need is questionable and development at this scale is speculative (21), vacant units exist at Magna Park & in the area (11) and that the scale of growth is too large and doesn't all need to accommodated at Magna Park / Lutterworth (9). Three objectors suggested that option C is too vast / and the issue is too strategic for the district to determine. Four others stated that this is the worst of all 3 options.</p> <p>Other notable issues raised by individuals included; increased pressure on housing & community services in Lutterworth, the impact on footpaths & bridleways, a lack of parking provision</p>
<p>Key issues raised in support:</p> <p>The sole supporter of Option C suggested that balancing development with maintaining some open space is more suited to the character of the district.</p>

<p>Key issues raised in comments:</p> <p>A developer raised concern regarding the impact of Option C on designated and un-designated heritage assets and their setting. Another comment suggested a 4th option of ‘No development’ be considered.</p>
<p>How comments have informed the Proposed Submission Local Plan:</p> <p>Comments have been considered along with further evidence. The Proposed Submission Local Plan proposes Strategic Distribution development across the District to 2031 including:</p> <ul style="list-style-type: none"> • Safeguarding of existing Magna Park for strategic B8 use • Additional development of up to 700,000sq.m strategic B8 use, subject to criteria including; it constitutes an extension to or adjoins the existing Magna Park, increases local employment opportunities, and does not lead to severe traffic impacts, particularly to the A5 <p>Additional evidence studies, including the Magna Park Employment Growth Sensitivity Study 2017, have informed this policy.</p>

Table A6.3e: Additional site/s promoted for strategic distribution use.

Site Location	Area	Promoter
Land to the north of Coventry Road at Woodbrig House Farm, nr. Lutterworth (proposed as additional expansion land / logical extension to Option B) proposed and considered in the Strategic Employment Land Availability Assessment 2017.	46.5ha	Pegasus Planning Group on behalf of RW & HJ Dewes (Respondent ID:5519)