

Submission to the Harborough Local Plan Consultation – Regulation 18

From: Tilton Steering Committee

Subject: Inadequacies in the Local Plan Draft – Representation on Missing Policy Safeguards Relevant to High Leicestershire

Based on the full review of the Harborough Local Plan Regulation 18 documents you uploaded, here is a ****draft submission from the Tilton campaign**** outlining significant omissions and gaps in the plan that should be addressed before adoption. These relate directly to Tilton, High Leicestershire, and rural tourism pressures.

Subject: Inadequacies in the Local Plan Draft – Representation on Missing Policy Safeguards Relevant to High Leicestershire

1. Failure to Address Cumulative Impact of Rural Tourism and Leisure Developments

The Local Plan does not include any strategic framework to assess **cumulative tourism pressure** in sensitive rural locations. This is a critical omission, particularly given the increasing number of speculative tourism schemes in areas like High Leicestershire.

- No monitoring baseline is proposed to assess saturation of infrastructure, ecology, or transport from leisure developments.
- The Plan includes no policy mechanism for controlling overconcentration in areas that lack public transport and sustainable access.
- There is no linkage between tourism development and infrastructure capacity or community tolerance.

This oversight allows piecemeal erosion of countryside tranquility and contradicts the SA's own findings that small-scale countryside developments may still result in **“minor negative impacts”** on landscape character.

2. Inadequate Weight Given to Neighborhood Plans and tranquility Policies

The Local Plan fails to reference or integrate key policies in the adopted **High Leicestershire Neighborhood Plan (HLNP)**, and includes:

- **Policy HL8 – Tranquility**, which protects against cumulative noise and light pollution
- **Policy HL9 – Dark Skies**, which highlights the area's recognised importance for astronomical clarity
- **Policy HL7 – Landscape**, which designates High Leicestershire as highly sensitive and recommends stringent tests on visibility, access and scale

Despite recognising tranquility and dark skies as valued features in the **Landscape Character Assessment (LCA)**, the Plan provides no enforceable mechanism to protect them from leisure-led intrusion.

3. Site Selection Methodology Ignores Visual and Topographical Suitability for Leisure Uses

The **Site Selection Methodology** and associated Housing and Employment Land Availability Assessments (SHELAA) focus almost entirely on residential and employment uses.

There is **no robust criteria** to assess the suitability of sites for **leisure and tourism use** based on:

- Landscape sensitivity
- Topographic accessibility (e.g., steep, narrow rural roads)
- Proximity to dark sky zones or SSSIs
- Cumulative visual impact

This allows schemes like the proposed “holiday lodge and spa resort” near Tilton to bypass the strategic planning process and be introduced via speculative applications, despite causing **permanent harm to unspoiled, topographically challenging areas**.

4. Missing Acknowledgement of Infrastructure Limits in Isolated Rural Areas

The Plan and its SA fail to reflect:

- **Realistic infrastructure thresholds** in isolated communities
- **Transport unviability** in locations without pavement, cycle lanes or safe walking routes
- **Emergency services limitations** in responding to higher population density from temporary or seasonal uses

There is no infrastructure stress testing for schemes with large-scale visitor flows to rural locations, despite the **SHELAA companion guide** acknowledging transport as a limiting factor for growth suitability.

5. Insufficient Reference to Design and Viewpoint Verification Standards

The Plan includes no standard requirement for:

- **Winter viewpoint assessments** in visibility-sensitive rural areas
- **Night-time lighting simulations**
- **Community engagement in landscape visual impact assessments (LVIA)**

This omission allows applicants to submit misleading visual evidence that obscures long-term and off-site impacts.

6. No Policy Acknowledgement of Rural Business Cannibalisation

There is no mechanism in the Plan to prevent:

- **Out competition of existing rural businesses** (e.g., camping barns, farm stays)
- **Loss of community-serving enterprises**, such as local cafés and pubs, due to resort-based facilities

This is a clear gap, given the Plan's stated aim to support rural economies, and it contradicts policies GD3 and RT4 by failing to distinguish between complementary and competitive tourism uses.

Conclusion and Recommendations

We request the Local Plan is revised to include:

- A **Rural Tourism Impact Policy**, explicitly covering cumulative harm, infrastructure burden, and rural saturation
- A policy to give **weight to neighborhood plan tranquility protections**
- Mandatory **winter photomontages** and night-time LVIA in rural applications
- A strategy to ensure **tourism development aligns with landscape and dark sky character**
- Specific **exclusion of major leisure schemes** in areas identified as visually or aurally sensitive in the LCA

This would bring Harborough's Local Plan into alignment with national policy objectives on tranquility (NPPF para 185), landscape protection, and the integrity of neighborhood planning.

7. Amenity Impacts from Poor Access and Junction Design

While some rural tourism developments may not trigger statutory highway safety objections, they still introduce considerable local amenity issues due to poor-quality access routes. The Local Plan and supporting evidence fail to account for cumulative, non-technical impacts such as:

- Noise and vibration from increased turning movements near existing homes
- Visibility reductions from constrained rural junctions
- Safety anxiety for non-motorised users including pedestrians and horse riders
- Diminished rural character due to signage, passing bays or surface upgrading

These issues, although not always quantified as 'capacity failures,' materially reduce quality of life for residents and should be addressed through policy safeguards. We recommend the Local Plan adopt an Amenity Impact Test for any leisure development generating more than 10 trips per day in rural settings.

8. Designated Ecological and Landscape Sites – Tourism Pressure

The Plan acknowledges Sites of Special Scientific Interest (SSSIs) and Local Wildlife Sites, but fails to address the indirect pressure posed by nearby high-footfall developments. In the case of the Tilton Cutting SSSI, increased visitor volumes and unregulated recreational use could undermine its scientific and educational value. The draft plan lacks:

- Visitor pressure thresholds for designated sites
- Buffer zones or setback requirements
- Specific restrictions on lighting and path surfacing near sensitive locations

We request policies to introduce Ecological Tranquillity Zones where planning proposals must demonstrate they will not lead to degradation of protected landscapes or habitat edges.