

Great Glen Neighbourhood Plan Review

Pre-submission consultation responses consultation to 21st January 2019

No.	Chapter/ Section	Policy Number	Respondent	Comment	Response	Amendment
1.			Natural England	No Comment	Noted	None
2.			Historic England	No additional comments at this time.	Noted	None
3			National Grid	The gas transmission pipeline does not affect any of the proposed development sites.	Noted	None
4.		GG1	Highways England	Due to the small scale of development growth it is not considered there will be any impacts on the operation of the SRN	Noted	None
5.	Page 8		Environment Agency	We welcome the acknowledgement that areas of Great Glen are at the highest and medium flood risk levels and that NPPF flooding Sequential Tests will be applied. Note no specific policy for flood risk within the settlement boundary. , However, where a Neighbourhood Plan is silent on a particular issue the District Councils Local Plan must be adhered to in the Plan making process. Policy CC3 'Managing Flood Risk', which can be found in Harborough District Council's Local Plan submitted for Examination addresses how flood risk should be addressed across the District. Before that Plans Adoption, the Districts existing Local Plan has a Policy addressing flood risk.	Noted. Policies within the Local Plan and the guidance within the NPPF will apply in relation to flood risk and its treatment with any planning application as referenced on page 8 of the NP. NP policy GG6 i) addresses the issue of flooding and climate change by requiring the incorporation of sustainable urban drainage systems into new development.	None
		GG1		Pleased that the site allocation is not in a flood risk area according to their maps.	Noted	None

		GG15		We are pleased with the wording of the 1 st paragraph of the Policy. Regarding the sentence starting, <i>“Development proposals which impact adversely...”</i> , we believe that in all instances such a scenario should be avoided. This could be achieved by strict adherence to the hierarchy of ‘Avoid, Mitigate and Compensate’ and we would suggest the current wording of the Policy be amended to include / reflect this hierarchy.	Agreed. Sentence to be amended to read ‘Development proposals that affect a site of ecological value will be expected to conserve and enhance its significant features, species and habitats, and to apply the hierarchy of avoid, mitigate and compensate’.	Amendment to be made as indicated.
6.			Leics. County Council Highways	No funding for major highway improvements. New developments should offer sufficient obligation to ensure that this is provided. Contribution sought for public transport also.	Noted. This will be determined at planning application stage.	None
			Planning	Developer Contributions The current Neighbourhood Plan had an obligations policy, which we feel with minor revision, would be suitable to use in the reviewed Neighbourhood Plan. Please find below suggested text:- New development can bring significant benefits to the local community, including new homes and jobs. It might also have negative impacts, for example, where additional demand is placed on local facilities, infrastructure and services that may already be at or near capacity. Planning obligations (also known as Section 106 agreements) may be used to	This is incorrect. The policy on developer contributions was deleted by the Examiner and was replaced with a community action. The community action remains in the reviewed neighbourhood plan.	None

				secure infrastructure or funding from a developer. For example, a planning obligation might be used to secure a financial contribution towards improving existing recreational facilities or affordable housing. Planning obligations; however, can only be sought where: they are necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.		
7		GG15	Burton Overy Parish Council	The extension of the wildlife corridor is welcomed.	Noted.	None
				Well constructed and considered – Well Done	None	None
8.	Page 13. Para 1		Harborough District Council	'which is scheduled to be Adopted in 2018' – Clearly this is no longer the case and it would be better to put 'which is likely to be adopted in 2019	Agreed	Change to be made as indicated.
	Page 21 Para 8.2			Up to date figure as of 31 March 2018 is 532 dwgs (291 completions since 2011 and 241 commitments as of 31 March 2018).	Noted. The draft NP references 241 commitments as of 31 March 2018.	None
	Page 22			Refers to 'A recent report by the District Council' (i.e. Great Glen Settlement Profile). Questionable whether it should be referred to as 'recent' and the information should be verified through the NP process.	Agreed. The figures will be updated as suggested.	Change to be made as indicated.
	Page 8.2.2 1 st Para			Refers to 2018 call for sites. There was no actual formal call for sites in 2018 rather there is an on-going rolling process for	Noted. Terminology to be changed to say '... sites added through an ongoing call for sites'.	Change to be made as indicated.

				putting sites forward for consideration in the SHLAA.		
	Page 8.2.6 4 th Para			Affordable Homes: The threshold site size for affordable housing is set by national policy and guidance and is more than 10 dwellings . This is reflected in the emerging Local Plan Policy H2 Affordable housing.	Agreed. The narrative will be changed to say 'more than 10 dwellings'.	Change to be made as indicated.
		GG		Paragraph below GG7 would be better placed above the policy under 8.3.3. as it starts: 'In addition to these nationally recognised Listed Buildings	We will amend as many of these formatting issues as possible.	Change to be made as indicated.
	8.4-			4 th paragraph font changes after 1 st Sentence	Noted.	Change to be made as indicated.
	8.6.3 2 nd Para			Reference to 2012 out of date. The latest Open Spaces Strategy was carried out in 2016.	Noted. This study will be referenced and its findings incorporated.	Change to be made as indicated.
	Figure 8			Boundary shown in Policies Map for St Cuthberts C of E School Playing Field under GI2 (see below) differs from that shown in Figure 8. Also GI2 shows a existing OSSR site at Stretton Hall (Chestnut Drive) which is not shown on Figure 8 or referred to in the policy	Chestnut drive added to fig 8. The school playing field looks the same in fig 8 as it does on the policies map; the discrepancy referred to could be that fig. 8 is showing the Stonehill Court open space - it's immediately adjacent, to the south.	Change to be made as indicated.
	Figure 10			Wildlife Corridors figure 10 should come before Figure 9 (bats) as the text re: wildlife corridors is before that re: bats.	Agreed.	Change to be made as indicated.

8.2.3			<p>suggest rewording the text to be a positive statement.</p> <p><i>Having considered these issues within the Steering Group, the Neighbourhood Plan is proposing a new Settlement Boundary to <u>(help protect the Parish from unsustainable development proposals)</u> replace with ensure. that new development is directed to the most sustainable locations. The Settlement Boundary policy will also ensure that sufficient land to meet residential and commercial need <u>delete</u> "is available in the right locations". The future land uses will be supported by existing transport and services infrastructure and "delete will" therefore "delete <u>be able to avoid encroaching</u>" encroachment into the countryside will be minimised.</i></p>	Agreed.	Change to be made as indicated.
8.3.4			<p>GG Conservation Area – The PC want to actively pursue CA designation – consideration for the LPA whether designation is appropriate. We would be pleased to discuss this further with the PC</p>	Noted. This will be pursued by the Parish Council and we are grateful for this constructive response.	None
8.6.5			<p>Trees & Hedgerows. Glen Oaks now has a TPO and should not be included on the map.</p>	Glen Oaks is not on the map. The slightly different colour is an ordinance survey issue rather than a separate designation.	None
		GG1	<p>Why only 10 houses? Officers cannot see why the other part of the field parcel be developed. May result in pressure for</p>	The site is listed in the SHLAA produced by Harborough DC as having a potential number of	None Agree

				more than 10 as there appears no environmental reason to restrict? Davidsons site to the north can access the field parcel from their existing site.	dwellings totalling 9. This is the reason for the number, which is agreed by the landowner.	
		GG2		Unnecessary to have “in plan area”	Agreed.	Change to be made as indicated.
		GG2		Consider whether the settlement boundary should be extended to include the three houses on London Road, one of which the LPA has a current application for to demolish the existing house and erect 3 dwellings - 18/02008/FUL. There needs to be justification for their exclusion.	Agreed – will amend to incorporate.	Change to be made as indicated.
		GG3		Semi-colon missing from end of c). Is built up area of Great Glen the same as settlement Boundary?	Yes, this will be clarified, and the typo corrected.	Change to be made as indicated.
		GG6		Semi-colon missing after criterion f).	Agreed	Change to be made as indicated.
		GG6		<i>Development proposals must demonstrate a high quality of design, layout and use of materials in order to make a positive contribution to the special character of the Parish in accordance with the approved Great Glen Village Design Statement:</i> The Great Glen VDS dates from 2005. While there are many aspects of the VDS that are relevant e.g. distinctive character and historic local building styles, brickwork detail door detail, rainwater systems and chimney details etc. there is also much that has changed beyond all	Noted – however, this 2005 document was used in the NP which passed examination in 2017. We would like to change as little of that document as possible, so have decided to keep it as it is	None

				recognition since 2005. There is a danger that an Examiner may see the reference to the VDs as being an attempt to elevate an existing document to a statutory status when it should not be. A suggestion may be to extract the relevant parts of the VDS as outlined above and form a new appendix to the Neighbourhood Plan that details how the design of new buildings should be addressed.		
		GG7		May be clearer to say: <i>Development proposals that affect the buildings and structures of local historic or architectural interest listed below, or their setting, will be expected to conserve their historic and architectural interest. in those development proposals</i>	Agreed – will change ‘the’ to ‘their’.	Change to be made as indicated.
		GG9		PD rights will allow change of use despite the well intentions of this policy.	This is noted. This is a policy which passed examination and is a current policy in the GG NP.	None
		GG10		Final sentence – suggest use of “supported” instead of “viewed positively”	Agreed.	Change to be made as indicated.
		GG15		Main aims of policy re: Wildlife corridors is not clear as amalgamated into criterion 2. Also ‘adversely’ unnecessary as all proposals impacting on wildlife corridors will need to demonstrate that they will not harm their integrity and effectiveness. Suggested wording: <i>Development proposals which impact adversely on the following wildlife corridors (shown in</i>	Agreed	Change to be made as indicated.

				<i>Figure 10) must demonstrate that they will not harm their integrity and effectiveness: 1. etc).</i>		
	2		Resident A	Refers to the lack of cycle ways and should state that the village is ill served in regards to safe cycling options and other sustainable modes of transport.	Noted. We will add in reference to the lack of cycle ways on page 65 where there is a policy (GG23) which seeks to address this. Community Action 5 also addresses the issue.	Change to be made as indicated.
	8.2 Page 21			Requests the figures are re-visited.	These figures have been updated as part of the updating to the NP following this consultation (see response 8 above).	Change to be made as indicated.
	8.2.3 Page 26			Feels that the Oaks Road (Millers 170 Houses) site should not be included in the settled boundary. In the absence of a final decision the plan should not be “pre-empted” by simply re-drawing the boundaries.	Noted, however the development has an outline planning permission and this needs to be reflected in the NP.	None
				Why is there a need for a “rural exception site”. A site has been identified (GG1 Section 8.2.2 page 23) That site can well take affordable housing and no further exception notices are needed, otherwise any development will exploit the loophole.	This is not proposing or allocating a site, it is reflecting national planning policy which allows development outside of a settlement boundary in certain circumstances. This is in the NP for clarification. If removed it would not change the policy position.	None.
	8.6.2 Pages 45-46			Why has the ridge and furrow on Land North of Oaks Road not been included in the sites worth protecting?	The part of the site with R&F will be included in the policy to help shape the development of this site.	Change to be made as indicated.
	8.6.3 Pages 47-48			The Stretton Glen bund has been included in the open spaces worthy of	As a public right of way it is protected I its own right.	None

				protection but the section with the public right of way to the Oaks has not?		
	8.6.4 Page 51-53			The Glen Oaks and the field next to it have been identified as a bat habitat and foraging range (Fig 9) it should be included in the list of key biodiversity sites (Fig 10) to afford protection and help preserve the species for future generations.	This is covered in policy GG15.	None
	8.6.7 Page 5)			The aspiration to designate the informal footpath from Spinney View to the oaks and associated spur A8 is laudable but should be linked to section 8.6.3 and afford status of important open space for residents. The cycle routes improvement plans are unambitious -A5 and A6 start too far away from the centre of the village centre. More provision in the village centre are needed in order to reduce the reliance on cars.	We believe that the plans are reasonable and deliverable.	None
	8.65.8 Page 59 - 60			Page 59 spelling error should read "Local" Shocked not to see the views towards the Oaks on the map as important views: this wooded area is iconic and arguably the most important skyline in the parish. The view should be protected from one direction.	Agreed The views south of Oaks Road and to the north east are included in the views policy.	Change to be made as indicated None

8.6.9 Pages 61-62			Whilst flooding is mentioned in the first paragraph there should be more to promote and influence the choice of permeable surfaces in new/future developments.	Noted. This is also covered under policy GG6 We will add in a further condition to policy GG6 i) 'other surface water measures and permeable surfaces'	Change to be made as indicated
8.7 Page 62			Bus journeys to and from Market Harborough need to be more frequent and journey time to be shortened.	Noted. This is beyond the scope of the neighbourhood plan.	None
8.7.2 Page 66			The age of the questionnaire queried as the results data does not match informal conversations with residents.	It can be confirmed that the Questionnaire was undertaken in 2014.	None
			Requests a draft of the revised Neighbourhood plan and to kept in informed of progress.	Noted.	None
Page 24 Fig 2		Resident B	Settlement boundary – is it appropriate to include the Oaks Road site within the settlement boundary when nothing has yet been decided?. Page 24 refers to fig 2 for the settlement boundary the correct figure is figure 3.	Thank you for pointing this out. Reference to 'figure 2' has been changed to 'figure 3'	Change to be made as indicated
	GG2		States the affordable housing should be considered in the countryside (statement b) This should be removed as it opens up a clear route to get land usage changed and then subsequently change types of housing. There is no benefit to having this clause as a potential concession in the plan.	Noted, however this is not a concession, but a reflection of national planning policy.	None.
	GG3		A clause encouraging development of smaller properties on infill plots; this should go further to include, and other	Criterion g) in GG3 requires there to be at least one small house of 1-2 bedrooms for every one larger	None

				policies should include, a strong drive for the development of smaller houses with one or two bedrooms only.	dwelling in any development of two or more dwellings.	
		GG5		The statement on affordable housing should be strengthened to be for affordable housing for sole ownership and not by shared ownership.	Thee Local Plan policies require a mix of tenures and the NP cannot deviate from this.	None
		GG12 & GG14		The resident would consider that various of the spaces listed only as “open spaces” should also be listed as “green spaces”. These should be reviewed and spaces placed in the category that best protects them	Noted, however there has been a comprehensive site assessment process and the sites selected as LGS are considered the most ‘special’ to the local community. The NPPF makes it clear that sites selected for LGS designation should not be excessive.	None
		GG14		Discusses an increase in open spaces – should this include a clause to protect the surrounding open countryside?	The policy identifies sites which have OSSR designations and have protection from inappropriate development. The policy cannot protect adjoining countryside unless that is also designated in the NP. Of course, all land outside of the settlement boundary has significant protection through the policy on the settlement boundary.	None
		Fig 14		There is a clear omission of any view onto the Oaks from any direction. These need to be added as the Oaks is a very prominent feature in the village and surrounding landscape, and visible from many parts of South Leicestershire.	The views south of Oaks Rod and to the north east are included in the views policy.	None

Footpath and cycleways			The idea of cycleways/footpaths A1-A6 are nice but it is entirely unclear how these connect to a network outside the parish boundary. None of the planned paths really connect within the village and this should be addressed. The path coming into Oaks Rad from Burton Overy (A2) and the path coming into Stretton Road (A5) these should be extended to connect to other cycle paths.	Policy GG18 identifies the need to enhance the existing network of footpaths and to work with other agencies to promote this	None.
Public transport			What is meant by “some public transport – mainly bus”? There is only bus as public transport?	Agreed – the narrative will be amended to refer only to the bus.	Change to be made as indicated.
Ridge & Furrow			The plan omits the Ridge & Furrow designation that was included in relation to the field at the top of Oaks Road, This should again be included.	The R&F to the south of the site will be included in the policy.	Change to be made as indicated.
Bats			The bat survey shows bats in the hedgerow in the Oaks road field and in the Oaks – those hedgerows should consequently be protected from possible removal to retain the habitat – Add to list of protected hedgerows.	This is covered by policy GG15	None
Views & Skyline	Policy GG19	Resident C	Note no mention of the view directly south from the aspirational footpath that runs along the northern edge of the field earmarked by Millers for housing development which the resident reminds us does not have full planning permission. Similarly the view north of the same two fields This given the inspector’s report is a serious omission.	The views south of Oaks Rod and to the north east are included in the views policy.	None

Footpaths	Fig 13		The aspiration footpath at A1 , The path that the resident has claimed runs all the way through to Oaks Road. – the map does not show this,	Noted. The footpath is shown on figure 13.	None
	Fig 7		Ridge & Furrow not shown in the southern most field (Millers development) on Oaks Road and is not indicated on the map. Hope that this can be rectified.	The R&F to the south of the site will be included in the policy.	Change to be made as indicated.
	Fig 7	Resident D	Concerned that Fig 7 proposes to remove the Oaks Road Ridge & Furrow contained in the existing neighbourhood plan without good reason. The consultants report on this site (Munroe & Whitten) confirms the importance of ridge & furrow on this site and the inspector agreed that it should be preserved.	As above	Change to be made as indicated.
	Fig 14		There is no reason that this policy should not include views north and across the Oaks Road site and south from the footpaths to the north. Map supplied. There is an informal footpath along the north boundary of the Oaks Road site which is well on it's way as being designated as a footpath /public right if way and therefore should be included on the map.	The R&F to the south of the site will be included in the policy. The footpath is on figure 13	Change to be made as indicated.
Ridge & Furrow		Pegasus Group & Ecus Consultants on behalf of David Wilson Homes	1.1 The Great Glen Neighbourhood Plan has been prepared under the neighbourhood planning regime first established through the Localism Act and the National Planning Policy Framework (the Framework). Once 'made', the Great	This general narrative is noted.	None

			<p>Glen Neighbourhood Plan will form part of the Development Plan, requiring that planning applications are determined in accordance with the Neighbourhood Plan, unless material considerations indicate otherwise; awarding it the same status as Local Plans in decision making.</p> <p>1.2 The Great Glen Neighbourhood Plan was 'made' on 23rd November 2017. Since this time, as the housing numbers for Great Glen have increased, and the Harborough Local Plan has been submitted for examination, with consultation on the main modifications taking place from 15th January until 26th February 2019. Also, since the Neighbourhood Plan was 'made', the new version of the National Planning Policy Framework (NPPF) has been published. Following the close of this pre-submission consultation, the Neighbourhood Plan will be submitted to Harborough District Council, who will then consult for 6 weeks before the Neighbourhood Plan is sent to an independent examiner for examination.</p> <p>1.3 Paragraph 37 of the Framework (2018) sets out that Neighbourhood Plans must meet certain 'basic conditions' and other legal requirements before they can come into force. These 'basic conditions' are set out at</p>		
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			<p>paragraph 8(2) of Schedule 4B of the 1990 Town and Country Planning Act. This will be tested through the independent examination that will take place once Harborough District Council has consulted on the Neighbourhood Plan. The Neighbourhood Plan must pass the 'basic conditions', including:</p> <ul style="list-style-type: none"> • Have regard to the national policies and advice contained in guidance issued by the Secretary of State; • Contribute to the achievement of sustainable development; • Be in general conformity with the strategic policies of the development plan for the area (Harborough District Council Core Strategy and the emerging Local Plan); and • Be compatible with the European Union and European Convention on Human Rights obligations. <p>1.4 When compared with the 'made' Neighbourhood Plan, the Pre-Submission Neighbourhood Plan proposes a new residential allocation north of Glen House (for around 10 dwellings) at Policy GG1. Policy GG2 updates the settlement boundary to take account of recent planning permissions, the north of Great</p>		
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			<p>Glen allocation and business developments. The ridge and furrow map has been amended to include additional areas of ridge and furrow across the wider area (Policy GG13), and Policy GG17 is a new policy that requires development proposals to respect historic features – such as ridge and furrow.</p> <p>1.5 Pegasus Group act on behalf of David Wilson Homes in relation to their land interests at London Road, Great Glen. A Site Location Plan is enclosed at Appendix 1. The site forms a part of a large area of ridge and furrow that is identified in the Pre-Submission Version Neighbourhood Plan at Policy GG13 (075). These representations should be read in conjunction with the enclosed report by Ecus Environmental Consultants (Appendix 2).</p> <p>2. Policy GG13 Ridge and Furrow</p> <p>2.1 Policy GG13 Ridge and Furrow seeks to preserve identified areas of well-preserved ridge and furrow, as shown at Figure 7 of the Pre-Submission Version Neighbourhood Plan, wherever possible. The land interest controlled by David Wilson Homes is identified at Figure 7 (075) as well-preserved ridge and furrow.</p>		
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			<p>2.2 These submissions are accompanied by a Review of Proposed Protection of Ridge and Furrow Report, by Ecus Environmental Consultants (Appendix 2). The report provides a summary of the heritage significance of the ridge and furrow, in order to assess potential impact and harm to both the asset itself and any contribution to the setting of other heritage assets, in accordance with Section 16 of the Framework (2018).</p> <p>2.3 The report considers that as the site does not contribute to the setting of any designated heritage asset, its loss through development cannot, in principle, be harmful. Given the proposed landscaping measures that would be incorporated into any future residential development on land under the control of David Wilson Homes, it is not considered that the principle of residential development would pose any harm.</p> <p>2.4 The remaining issue is whether the loss of ridge and furrow, as a non-designated heritage asset, is sufficiently adverse as to justify its preservation within the emerging Neighbourhood Plan. It should be noted that the sites identified at Figure 7 have previously been characterised and assessed and</p>	<p>This comment is noted. However, the policy does not preclude the potential for development, but rather it requires any locally significant features to be taken into account – the benefits of such development to be balanced against the significance of the local features.</p> <p>The opportunity has been taken, through the Neighbourhood Plan, to recognise the importance of these features.</p>	<p>None</p> <p>None</p>
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			<p>have not been considered to be of sufficient importance to warrant protection, prior to the production of this Neighbourhood Plan.</p> <p>2.5 Ridge and furrow earthworks are the most common relict of our medieval past throughout the country; the best examples of which are scheduled. These are primarily where they are particularly well-preserved and in proximity to settlement remains, such as shrunken medieval village remains often showing signs of village planning in the post Black Death period. The ridge and furrow earthworks in Great Glen form less than 10% of the former field system, and therefore their resulting interest is slight, and they therefore only just fall within the category of non-designated heritage assets of local importance.</p> <p>2.6 Nevertheless, as David Wilson Homes propose to retain some of the more visual elements of the ridge and furrow within any future masterplan for the site, as public open space, this would preserve any significance. This would reduce the overall impact from substantial harm (total loss) to less than substantial harm, for the purposes of the planning balance. Furthermore, given their assessed local importance, the magnitude of harm can be further</p>	<p>It is because the extent of ridge and furrow is decreasing that it is of such significance.</p> <p>We note your confirmation that they are appropriately classified as non-designated heritage assets.</p> <p>The determination of any planning application would be determined in part on the basis of a judgement by HDC about the balance of 'harm' versus 'benefit'.</p>	<p>None</p> <p>None</p> <p>None</p>
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			<p>quantified as being closer to the lower threshold than borderline with substantial.</p> <p>3. Policy GG17 Historic Landscape Character Area</p> <p>3.1 Policy GG17 Historic Landscape Character Area requires development proposals in the southwest section of Great Glen to respect the historic features, as shown at Figure 12. This policy designation lies adjacent to the land interests of David Wilson Homes. Any loss or damage arising from a development proposal is to be avoided; and the benefits of such development must be balanced against the significance of the landscape character area's features, its tranquillity and scenic values, and as the setting for the Grade II* Listed St Cuthbert's Church.</p> <p>3.2 The enclosed report by Ecus Environmental Consultants considers the heritage assets in proximity to the David Wilson Homes site. The report concludes that the site is not considered to contribute to the immediate landscape setting of the Church of St Cuthbert. Policy GG17 also refers to ridge and furrow, which is discussed in detail at Section 2 above and within the accompanying heritage report (Appendix 2).</p>	<p>The report is noted. The balance of harm against benefit would be determined by HDC when determining the outcome of a planning application.</p>	<p>None</p>
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			<p>3.3 Any future residential development of the site south of London Road can be designed sensitively to ensure that there is no harm to identified heritage assets.</p> <p>Furthermore, it is suggested that the wording of Policy GG17 be amended to reflect paragraphs 193 – 197 of the Framework (2018), in order to meet the ‘basic conditions’, as required.</p> <p>4. Summary and Conclusions</p> <p>4.1 Pegasus Group act on behalf of David Wilson Homes in relation to their land interests south of London Road, Great Glen (identified at Appendix 1). The Pre- Submission Version of the Great Glen Neighbourhood Plan seeks to designate the site under Policy GG13 which looks to preserve identified areas of well-defined ridge and furrow, where possible. Additionally, Policy GG17 requires development proposals to respect historic features, that constitute the historic landscape area in the southwest section of Great Glen (Policy GG17), which is located adjacent to the site under the control of David Wilson Homes.</p>	<p>Noted</p> <p>Policy GG17 already balances harm/loss of heritage assets in its wording which says ‘the benefits of such development must be balanced against the significance of the landscape character area’s features’.</p>	<p>None</p> <p>None</p>
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4.2 These representations are supported by a report by Ecus Environmental Consultants (Appendix 2) which has assessed the ridge and furrow earthworks within the site, in accordance with current best practice and the appropriate professional guidelines published by the Chartered Institute for Archaeologists.

4.3 The report states that the ridge and furrow present within the site south of London Road has been assessed as having only just sufficient heritage interest to justify being identified as non-designated heritage assets, and this level of significance is judged to be of only local importance. Should this assessment have taken place in the context of a planning application for residential development, a process of evaluation and mitigation would take place, and preservation in situ would not have been considered appropriate.

4.4 The site south of London Road, Great Glen does not contribute to the setting of any designated heritage asset. The impact of the loss of ridge and furrow, as a non-designated heritage asset of only local importance, is found to be less than substantial harm and the site under the control of David Wilson Homes should therefore be deleted from Figure

				<p>7/Policy GG13. Furthermore, through any future development proposals on this site, David Wilson Homes would look to retain some of the more visual elements of ridge and furrow through the masterplanning of the site. The site is not considered to contribute to the immediate landscape setting of the Church of St Cuthbert.</p> <p>4.5 In addition, to ensure compliance with the 'basic conditions', the wording of Policy GG17 should be amended to reflect the wording of paragraph 193 – 196 of the Framework (2018), which assesses harm to/loss of heritage assets.</p>		
	Overall Plan		Resident E	Fully supports the plan and thanks all involved in its preparation.	Noted	None
	Overall Plan		Leicestershire County Council	<p>Leicestershire County Council is supportive of the Neighbourhood plan process and welcome being included in this consultation.</p> <p>Highways General Comments The County Council recognises that residents may have concerns about traffic conditions in their local area, which they feel may be exacerbated by increased traffic due to population, economic and development growth.</p>	These general comments are noted.	None

Like very many local authorities, the County Council's budgets are under severe pressure. It must therefore prioritise where it focuses its reducing resources and increasingly limited funds. In practice, this means that the County Highway Authority (CHA), in general, prioritises its resources on measures that deliver the greatest benefit to Leicestershire's residents, businesses and road users in terms of road safety, network management and maintenance. Given this, it is likely that highway measures associated with any new development would need to be fully funded from third party funding, such as via Section 278 or 106 (S106) developer contributions. I should emphasise that the CHA is generally no longer in a position to accept any financial risk relating to/make good any possible shortfall in developer funding.

To be eligible for S106 contributions proposals must fulfil various legal criteria. Measures must also directly mitigate the impact of the development e.g. they should ensure that the development does not make the existing highway conditions any worse if considered to have a severe residual impact. They cannot unfortunately be sought to address existing problems.

			<p>Where potential S106 measures would require future maintenance, which would be paid for from the County Council's funds, the measures would also need to be assessed against the County Council's other priorities and as such may not be maintained by the County Council or will require maintenance funding to be provided as a commuted sum.</p> <p>With regard to public transport, securing S106 contributions for public transport services will normally focus on larger developments, where there is a more realistic prospect of services being commercially viable once the contributions have stopped i.e. they would be able to operate without being supported from public funding.</p> <p>The current financial climate means that the CHA has extremely limited funding available to undertake minor highway improvements. Where there may be the prospect of third party funding to deliver a scheme, the County Council will still normally expect the scheme to comply with prevailing relevant national and local policies and guidance, both in terms of its justification and its design; the Council will also expect future maintenance costs to be covered by the third party funding.</p>		
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			<p>Where any measures are proposed that would affect speed limits, on-street parking restrictions or other Traffic Regulation Orders (be that to address existing problems or in connection with a development proposal), their implementation would be subject to available resources, the availability of full funding and the satisfactory completion of all necessary Statutory Procedures.</p> <p>Flood Risk Management The County Council are fully aware of flooding that has occurred within Leicestershire and its impact on residential properties resulting in concerns relating to new developments. LCC in our role as the Lead Local Flood Authority (LLFA) undertake investigations into flooding, review consent applications to undertake works on ordinary watercourses and carry out enforcement where lack of maintenance or unconsented works has resulted in a flood risk. In April 2015 the LLFA also became a statutory consultee on major planning applications in relation to surface water drainage and have a duty to review planning applications to ensure that the onsite drainage systems are designed in accordance with current legislation and guidance. The LLFA also ensures that flood risk to the site is</p>		
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accounted for when designing a drainage solution.

The LLFA is not able to:

- Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation.
- Use existing flood risk to adjacent land to prevent development.
- Require development to resolve existing flood risk.

When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points:

- Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)).
- Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map).
- Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding.
- How potential SuDS features may be incorporated into the development to enhance the local amenity, water quality and biodiversity of the site as well as manage surface water runoff.
- Watercourses and land drainage should be protected within new

			<p>developments to prevent an increase in flood risk.</p> <p>All development will be required to restrict the discharge and retain surface water on site in line with current government policies. This should be undertaken through the use of Sustainable Drainage Systems (SuDS). Appropriate space allocation for SuDS features should be included within development sites when considering the</p> <p>housing density to ensure that the potential site will not limit the ability for good SuDS design to be carried out. Consideration should also be given to blue green corridors and how they could be used to improve the bio-diversity and amenity of new developments, including benefits to surrounding areas.</p> <p>Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing watercourses and land drainage (including watercourses that form the site boundary) are retained as open features along their original flow path, and are retained in public open space to ensure that access for maintenance can be achieved. This should also be considered when looking</p>		
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			<p>at housing densities within the plan to ensure that these features can be retained.</p> <p>LCC, in its role as LLFA will not support proposals contrary to LCC policies.</p> <p>For further information it is suggested reference is made to the National Planning Policy Framework (March 2012), Sustainable drainage systems: Written statement - HCWS161 (December 2014) and the Planning Practice Guidance webpage.</p> <p>Flood risk mapping is readily available for public use at the links below. The LLFA also holds information relating to historic flooding within Leicestershire that can be used to inform development proposals.</p> <p>Risk of flooding from surface water map: https://flood-warning-information.service.gov.uk/long-term-flood-risk/map Flood map for planning (rivers and sea): https://flood-map-for-planning.service.gov.uk/</p> <p>Planning Developer Contributions The current Neighbourhood Plan had an obligations policy, which we feel with minor revision, would be suitable to use</p>		
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			<p>in the reviewed Neighbourhood Plan. Please find below suggested text:-</p> <p>New development can bring significant benefits to the local community, including new homes and jobs. It might also have negative impacts, for example, where additional demand is placed on local facilities, infrastructure and services that may already be at or near capacity.</p> <p>Planning obligations (also known as Section 106 agreements) may be used to secure infrastructure or funding from a developer. For example, a planning obligation might be used to secure a financial contribution towards improving existing recreational facilities or affordable housing. Planning obligations; however, can only be sought where: they are necessary to make the development acceptable in planning terms; directly related to the development; and fairly and reasonably related in scale and kind to the development.</p> <p>A new levy was introduced alongside the use of planning obligations, known as the Community Infrastructure Levy (CIL). It requires developers to make a payment to the District Council based on the size and type of development that is proposed. The proceeds of the levy will then be used to provide the</p>		
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infrastructure necessary to support growth across the District. A proportion of these CIL receipts will automatically be devolved to the relevant Parish Council for allocation to neighbourhood priorities. This proportion is set at 25% in areas where there is a Neighbourhood Plan in force. At this time Harborough District Council is still considering whether to introduce CIL.

Mineral & Waste Planning
The County Council is the Minerals and Waste Planning Authority; this means the council prepares the planning policy for minerals and waste development and also makes decisions on mineral and waste development.

Although neighbourhood plans cannot include policies that cover minerals and waste development, it may be the case that your neighbourhood contains an existing or planned minerals or waste site. The County Council can provide information on these operations or any future development planned for your neighbourhood.

You should also be aware of Mineral Consultation Areas, contained within the adopted Minerals Local Plan and Mineral and Waste Safeguarding proposed in the new Leicestershire Minerals and Waste

			<p>Plan. These proposed safeguarding areas and existing Mineral Consultation Areas are there to ensure that non-waste and non- minerals development takes place in a way that does not negatively affect mineral resources or waste operations. The County Council can provide guidance on this if your neighbourhood plan is allocating development in these areas or if any proposed neighbourhood plan policies may impact on minerals and waste provision.</p> <p>Education Whereby housing allocations or preferred housing developments form part of a Neighbourhood Plan the Local Authority will look to the availability of school places within a two mile (primary) and three mile (secondary) distance from the development. If there are not sufficient places then a claim for Section 106 funding will be requested to provide those places.</p> <p>It is recognised that it may not always be possible or appropriate to extend a local school to meet the needs of a development, or the size of a development would yield a new school. However, in the changing educational landscape, the Council retains a statutory duty to ensure that sufficient places are available in good schools within its area,</p>		
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for every child of school age whose parents wish them to have one.

Property
Strategic Property Services
No comment at this time.

Adult Social Care
It is suggested that reference is made to recognising a significant growth in the older population and that development seeks to include bungalows etc of differing tenures to accommodate the increase. This would be in line with the draft Adult Social Care Accommodation Strategy for older people which promotes that people should plan ahead for their later life, including considering downsizing, but recognising that people's choices are often limited by the lack of suitable local options.

Environment
With regard to the environment and in line with the Governments advice, Leicestershire County Council (LCC) would like to see Neighbourhood Plans cover all aspects of the natural environment including climate change, the landscape, biodiversity, ecosystems, green infrastructure as well as soils, brownfield sites and agricultural land.

Climate Change

The County Council through its Environment Strategy and Carbon Reduction Strategy is committed to reducing greenhouse gas emissions in Leicestershire and increasing Leicestershire's resilience to the predicted changes in climate. Neighbourhood Plans should in as far as possible seek to contribute to and support a reduction in greenhouse gas emissions and increasing the county's resilience to climate change.

Landscape
The County Council would like to see the inclusion of a local landscape assessment taking into account Natural England's Landscape character areas; LCC's Landscape and Woodland Strategy and the Local District/Borough Council landscape character assessments. We would recommend that Neighbourhood Plans should also consider the street scene and public realm within their communities, further advice can be found in the latest 'Streets for All East Midlands' Advisory Document (2006) published by English Heritage.

Biodiversity
The Natural Environment and Communities Act 2006 places a duty on all public authorities in England and Wales to have regard, in the exercise of

			<p>their duties, to the purpose of conserving biodiversity. The National Planning Policy Framework (NPPF) clearly outlines the importance of sustainable development alongside the core principle that planning should contribute to conserving and enhancing the natural environment and reducing pollution. Neighbourhood Plans should therefore seek to work in partnership with other agencies to develop and deliver a strategic approach to protecting and improving the natural environment based on local evidence and priorities. Each Neighbourhood Plan should consider the impact of potential development on enhancing biodiversity and habitat connectivity such as hedgerows and greenways.</p> <p>The Leicestershire and Rutland Environmental Records Centre (LRERC) can provide a summary of wildlife information for your Neighbourhood Plan area. This will include a map showing nationally important sites (e.g. Sites of Special Scientific Interest); locally designated Wildlife Sites; locations of badger setts, great crested newt breeding ponds and bat roosts; and a list of records of protected and priority Biodiversity Action Plan species. These are all a material consideration in the planning process. If there has been a recent Habitat Survey of your plan area,</p>		
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this will also be included. LRERC is unable to carry out habitat surveys on request from a Parish Council, although it may be possible to add it into a future survey programme.

Contact: planningecology@leics.gov.uk, or phone 0116 305 4108

Green Infrastructure

Green infrastructure (GI) is a network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities, (NPPF definition). As a network, GI includes parks, open spaces, playing fields, woodlands, street trees, cemeteries/churchyards allotments and private gardens as well as streams, rivers, canals and other water bodies and features such as green roofs and living walls.

The NPPF places the duty on local authorities to plan positively for a strategic network of GI which can deliver a range of planning policies including: building a strong, competitive economy; creating a sense of place and promote good design; promoting healthier communities by providing greater opportunities for recreation and mental and physical health benefits; meeting the challenges of climate change and flood

			<p>risk; increasing biodiversity and conserving and enhancing the natural environment. Looking at the existing provision of GI networks within a community can influence the plan for creating & enhancing new networks and this assessment can then be used to inform CIL (Community Infrastructure Levy) schedules, enabling communities to potentially benefit from this source of funding.</p> <p>Neighbourhood Plan groups have the opportunity to plan GI networks at a local scale to maximise benefits for their community and in doing so they should ensure that their Neighbourhood Plan is reflective of the relevant Local Authority Green Infrastructure strategy. Through the Neighbourhood Plan and discussions with the Local Authority Planning teams and potential Developers communities are well placed to influence the delivery of local scale GI networks.</p> <p>Brownfield, Soils and Agricultural Land The NPPF encourages the effective use of brownfield land for development, provided that it is not of high environmental/ecological value. Neighbourhood planning groups should check with DEFRA if their neighbourhood planning area includes brownfield sites. Where information is lacking as to the</p>		
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			<p>ecological value of these sites then the Neighbourhood Plan could include policies that ensure such survey work should be carried out to assess the ecological value of a brownfield site before development decisions are taken.</p> <p>Soils are an essential finite resource on which important ecosystem services such as food production, are dependent on. They therefore should be enhanced in value and protected from adverse effects of unacceptable levels of pollution. Within the governments “Safeguarding our Soils” strategy, DEFRA have produced a code of practice for the sustainable use of soils on construction sites which could be helpful to neighbourhood planning groups in preparing environmental policies.</p> <p>High quality agricultural soils should, where possible be protected from development and where a large area of agricultural land is identified for development then planning should consider using the poorer quality areas in preference to the higher quality areas. Neighbourhood planning groups should consider mapping agricultural land classification within their plan to enable informed decisions to be made in the future. Natural England can provide</p>		
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				<p>further information and Agricultural Land classification.</p> <p>Impact of Development on Civic Amenity Infrastructure Neighbourhood planning groups should remain mindful of the interaction between new development applications in a district area and the Leicestershire County Council. The County's Waste Management team considers proposed developments on a case by case basis and when it is identified that a proposed development will have a detrimental effect on the local civic amenity infrastructure then appropriate projects to increase the capacity to off-set the impact have to be initiated. Contributions to fund these projects are requested in accordance with Leicestershire's Planning Obligations Policy and the Community Infrastructure Legislation Regulations.</p> <p>Communities Communities Consideration of community facilities is a positive facet of Neighbourhood Plans that reflects the importance of these facilities within communities and can proactively protect and develop facilities to meet the needs of people in local communities. Neighbourhood Plans provide an opportunity to;</p>		
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			<p>1. Carry out and report on a review of community facilities, groups and allotments and their importance with your community.</p> <p>2. Set out policies that seek to;</p> <ul style="list-style-type: none"> • protect and retain these existing facilities, • support the independent development of new facilities, and, • identify and protect Assets of Community Value and provide support for any existing or future designations. <p>3. Identify and support potential community projects that could be progressed.</p> <p>You are encouraged to consider and respond to all aspects community resources as part of the Neighbourhood Planning process. Further information, guidance and</p> <p>Examples of policies and supporting information are available at www.leicestershirecommunities.org.uk/n/p/useful-information.</p> <p>Economic Development We would recommend including economic development aspirations with your Plan, outlining what the community currently values and whether they are open to new development of small businesses etc.</p>		
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				<p>Superfast Broadband</p> <p>High speed broadband is critical for businesses and for access to services, many of which are now online by default. Having a superfast broadband connection is no longer merely desirable, but is an essential requirement in ordinary daily life.</p> <p>All new developments (including community facilities) should have access to superfast broadband (of at least 30Mbps) Developers should take active steps to incorporate superfast broadband at the pre-planning phase and should engage with telecoms providers to ensure superfast broadband is available as soon as build on the development is complete. Developers are only responsible for putting in place broadband infrastructure for developments of 30+ properties. Consideration for developers to make provision in all new houses regardless of the size of development should be considered.</p> <p>Equalities</p> <p>While we cannot comment in detail on plans, you may wish to ask stakeholders to bear the Council’s Equality Strategy 2016-2020 in mind when taking your Neighbourhood Plan forward through the</p>		
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				relevant procedures, particularly for engagement and consultation work. A copy of the strategy can be view at: www.leicestershire.gov.uk/sites/default/files/field/pdf/2017/1/30/equality-strategy2016-2020.pdf		
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