

REPORT 4

HARBOROUGH DISTRICT COUNCIL

REPORT TO THE CABINET MEETING OF 11th October 2021

PUBLIC REPORT: Y

EXEMPT REPORT: N

Report Title	Development Management Supplementary Planning Document (SPD).
KEY DECISION	Yes
Report Author	Adrian Eastwood - Development Planning Manager
Purpose of Report	To consider the public consultation report (Appendix A) to the Draft Development Management Supplementary Planning Document (SPD) and for Cabinet to recommend Council adopt the up to date SPD (Appendix B).
Reason for Decision	The Council has a range of 21 Supplementary Planning Guidance documents dating from 2003. As these were prepared a number of prior to the April 2019 Harborough Local Plan they are now out of date and in need of updating.
Portfolio (holder)	Councillor J Bateman (Planning)
Corporate Priorities	<ul style="list-style-type: none">• An enterprising, vibrant place• A healthy, inclusive and engaged community
Financial Implications	The draft SPD and its public consultation has been produced and carried out by existing resources.
Risk Management Implications	See section 4.0 below.
Environmental Implications	The SPD addresses planning for climate change.
Legal Implications	The SPD is prepared in accordance with legislation.
Equality Implications	No overall adverse effects have been identified.
Data Protection Implications	None.
Consultation	An eight-week period of consultation was undertaken from 11 th December 2020 to 5 th February 2021. A report of this consultation is attached as Appendix A.
Options	See section 7.0 below.
Background Papers	HDC Supplementary Planning Guidance (various) National Design Guide (October 2019) online.
Recommendation	That Cabinet recommend Council adopt the Development Management Supplementary Planning Document (SPD) attached at Appendix B to this report.

1. Introduction

- 1.1 The Council has a range of 21 Supplementary Planning Guidance documents dating from 2003. As these were prepared many years prior to the adoption in April 2019 of the new Harborough Local Plan they are out of date. In turn that greatly reduces their relevance, and help they give to customers planning proposals and subsequent planning decisions.
- 1.2 The suggested SPD aims to rationalise and simplify the 2003 Supplementary Planning Guidance into one up to date document.

2. Key Facts

- 2.1 A Supplementary Planning Document (SPD) cannot make new policy. It can add further detail to the policies in the Local Plan. In effect it can be guidance relating to important planning topics and assist in the implementation of the Local Plan. A supplementary planning document, where relevant, shall be a material consideration in planning decisions but is not part of the development plan.

3. Summary

- 3.1 Planning decisions and proposals through Development Management, if approved and built, contribute significantly to the district. In turn this contributes to Council priorities including a safe, enterprising, and vibrant place, and a healthy and prosperous future.
- 3.2 The single document SPD proposed will be a more efficient way of presenting the planning guidance. It will improve customer service by giving up to date information as a single document, thereby making the guidance more accessible to customers and all who make use of it.

4. Risk Management Implications

- 4.1 A relevant supplementary planning document is a material consideration in planning decisions. It is not part of the development plan. The supplementary planning guidance from 2003 cannot be relied upon given its age and also due to the fact that it is not linked to the up-to-date Local Plan adopted in April 2019.
- 4.2 The new single document SPD will allow the Council to provide better planning guidance across the district. In turn this shall help meet the needs of local communities and outside organisations interested in development proposals, in line with the Council's vision and priorities.
- 4.3 Public consultation has been carried out concerning the updated Development Management Supplementary Planning Document (SPD) and the responses made and officers response to them are reported at Appendix A. Where appropriate the SPD has been amended in light of these consultation responses. The amendments made are set out in the response to consultation

at Appendix A. The resulting post consultation version of the SPD document is at Appendix B.

5. Legal Issues

- 5.1 The power to complete Supplementary Planning Documents are set out in Regulations 11 to 16 of the Town and Country Planning (Local Planning) (England) Regulations 2012.

6. Equality Implications

- 6.1 An Equality Impact Assessment has been completed. No adverse effects were identified.

7. Options

- 7.1 Adopt the SPD.
- 7.2 Not to adopt the new Development Management SPD. This will leave a gap in guidance and risk uninformed and poorer quality planning applications.

Appendix A
Report of public consultation
Development Management Supplementary Planning Document

Question number & topic	Comment by	Comment	Action
1 - Introduction	Mr Baker-Adams	This seems to some headline issues that an applicant will want guidance on which this SPD is best placed to respond to.	Noted. The introductory section is intended to headline issues.
	Mr Baildon	Climate Change. Solar panels or solar tiles should be a requirement of ALL NEW PERMISSIONS. The solar panel firms have open season when new housing arrives. The technology has been around for decades. In the 1990s I noted on the Greek island of Patmos that despite a primitive 17C no-paper sewer system, many houses/flats/shops/hotels had 20C mini-turbine/solar panel/tank next to their satellite dish on the roof.	This would be introducing a new blanket planning policy which the SPD cannot do (see accompanying report). Any such policy must be introduced via a Local Plan.
	Thurnby & Bushby Society	<p>The committee of Thurnby and Bushby Society has considered the three consultation documents and agree that they are thorough and comprehensive, with one exception.</p> <p>The exception is that there is no reference to caravan sites or the parking of caravans and motor homes, which are unsightly when parked outside residential properties.</p>	Noted. The parking of caravans and motor homes at residential properties does not require planning permission. The SPD cannot introduce new legislative restrictions.
	British Horse Society	Although Rights of Way are mentioned, the language used could be more inclusive of	This has been added for example at paragraph 7.16

		<p>equestrians. Bridleways and byways are shared successfully by equestrians, cyclists and pedestrians therefore segregating cyclists/pedestrians on routes and excluding equestrians increases the risk to horses and riders by sandwiching them on increasingly busy roads between cyclists and motorised traffic. There are also missed opportunities and economic advantages of sharing routes. The equestrian industry generates £4.7 billion of consumer spending, £4,174 per horse (BETA, 2019) to the economy benefitting local economies where equestrian activities thrive.</p> <p>The British Horse Society would welcome further engagement in consultations in relation to local plans.</p>	
	Highways England	<p>The Development Management SPD provides guidance to help with interpreting and implementing Harborough Districts' Local Plan Policies. We have limited comments to provide on this document, although in relation to policy GD1 – Achieving sustainable development we would welcome clear requirements for future developments to promote sustainable methods of transport such as walking, cycling and public transport.</p>	<p>Noted. As Harborough Local Plan policy IN2 – sustainable transport sets out policy requirements the SPD cannot add to those.</p>
	Rosamund Worrall	<p>I am writing to advise that Historic England welcomes the aspirations of the overall SPD and, in particular, the intentions of Chapter 4: Conservation Areas and Listed Buildings; Chapter 9: Conversion of redundant and disused buildings; and, Chapter 11 Shop Fronts and Advertisements.</p>	<p>Noted with thanks.</p>

	<p>Natural England</p>	<p>Whilst we welcome this opportunity to give our views, the topic of the Supplementary Planning Document does not appear to relate to our interests to any significant extent. We therefore do not wish to comment.</p> <p>Should the plan be amended in a way which significantly affects its impact on the natural environment, then, please consult Natural England again.</p> <p>Strategic Environmental Assessment/Habitats Regulations Assessment</p> <p>A SPD requires a Strategic Environmental Assessment only in exceptional circumstances as set out in the Planning Practice Guidance here. While SPDs are unlikely to give rise to likely significant effects on European Sites, they should be considered as a plan under the Habitats Regulations in the same way as any other plan or project. If your SPD requires a Strategic Environmental Assessment or Habitats Regulation Assessment, you are required to consult us at certain stages as set out in the Planning Practice Guidance.</p> <p>Please send all planning consultations electronically to the consultation hub at consultations@naturalengland.org.uk.</p>	<p>Noted.</p>
	<p>Boyer Planning</p>	<p>Q1 – Introduction</p> <p>2.1 The introduction to the SPD highlights its relationship to Harborough’s Local Plan (2019). The current SPGs (adopted in 2003) are out of date, as such a new and updated SPD of which combines a</p>	<p>Noted. Further explanation has been added to the introductory section.</p>

		<p>number of aspects related to the built environment is welcomed.</p> <p>2.2 We consider the introduction of the document to be quite basic and obligatory. Whilst this is a document that should be used as a tool for providing detailed guidance, clarity and equally raising the standards of quality and design within the District, it would be helpful that this section of the SPD introduces its purpose in the wider context of the planning system and how the SPD has been prepared in comparison to the previous SPGs. As such, the introduction page would benefit from setting out these points and adding further information for the purposes of context and highlighting the importance of achieving design expectations within the District. It is strongly recommended a small paragraph to explain the following should be included which would assist in the effective use of the SPD:</p> <ul style="list-style-type: none"> • How the SPD should be used? • Who the SPD is intended for? • The purpose of the SPD? • The National Design Guide and how it is has influenced the SPD. <p>3.3 The currently adopted SPGs (2003) are out of date, as such a new and updated SPD is currently being consulted prior to its adoption. This representation provides a response to the sections most relevant to Taylor Wimpey and this includes</p>	
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		<p>the Introduction, Design Principles, Climate Change and Landscape and Development.</p> <p>3.4 Overall, we welcome and generally support the SPD and consider it provides important guidance on how to interpret and implement the policies contained within the Harborough Local Plan (2019).</p> <p>3.5 However, as currently worded the SPD it too prescribed and restrictive. It therefore fails to give the necessary flexibility for each proposal to be assessed on its own merit. In line with paragraph 125 of NPPF 'Plans should, at the most appropriate level, set out a clear design vision and expectations, so that applicants have as much certainty as possible about what is likely to be acceptable.' In this case the proposed wording is not appropriate, too detailed and restrictive and therefore amendments are required as detailed throughout this representation.</p>	
2 – Design principles	Mr Major	2.8 to 2.13 With the national government requiring a fundamental change from internal combustion engines to electrically powered vehicles within the next 10 years or so the consequent need for charging points for every house should be contained in the planning documents.	This would be introducing a new blanket planning policy which the SPD cannot do (see accompanying report). Any such policy must be introduced via a Local Plan.
	Sport England	The 2015 evidence quoted in para 2.20 is out of date and has in part been replaced or is currently being replaced	Noted. SPD is updated.
	Mr Booker	Greater energy efficiency must be driven by policies which facilitate that goal at the expense of new compliant buildings looking different to the old stock in both materials, design and setting.	New policies need to be introduced via a Local Plan. The SPD must refer to existing policies (see accompanying report).

	Mr Rowlands	sections 2.8, 2.9, 2.10 - a reference would be useful here to section 8 - Climate Change - regarding requirements for electric vehicle charging for off-street parking spaces for 3 and 4-bedroom houses where car ownership is likely to be higher.	Reference to encourage charging points is included at paragraph 2.9 However the SPD cannot itself make this a mandatory requirement.
	Mr Baildon	<p>Q 2.5-2.6 Separation must NOT be fixed but subjective as small and large sites can reflect differing decades of development and different plot sizes also have reference.</p> <p>2.8-2.15 (Off) street parking has for decades been an increasing problem with very often now 4 cars per house plus "work" van etc and garage conversions have led to increased street parking, both the older 19C areas and the newer 20C and now the 21C that has still not caught up with the reality of multiple car ownership. On the former Husbands Bosworth hotel redevelopment a courtyard is now FULL of cars as only ONE has a small enough car and the others are using the garages for extra residential use.</p>	Paragraph 2.6 of the SPD confirms the separation distance are guidelines to be applied flexibly depending on individual merit and site factors
	Leicestershire County Council	<p>A number of chapters include sections copied from the Leicestershire Highway Design Guide (LHDG). This is a live guide and is currently under review. Therefore, it is recommended that these are simply replaced with "please refer to Leicestershire County Council's current highway design guidance".</p> <p>Some chapters refer to LCC Highways, when they should refer to the LHDG.</p> <p>The parking space dimensions as detailed are not consistent with the LHDG.</p> <p>Some proposals will require separate consents from LCC as the Local Highway Authority (e.g.</p>	The SPD has been updated at paragraph 2.8 to clarify the Leicestershire Highway Design Guide is a 'live' document hosted online which is subject to regular updating. References should therefore be cross- referenced to the current version of the Guide available on Leicestershire County Council website.

		<p>overhanging signs and planting within the highway). This is referenced within some sections of the document, but not others. It is recommended that consistent referencing where other consent is needed is used throughout the document.</p> <p>It is also recommended that the document makes reference to requirements for supporting infrastructure/mitigation, where necessary.</p>	<p>References have been amended to LHDG and further typo changes if needed can be made at publication stage.</p>
	<p>Leicestershire County Council</p>	<p>Older and Disabled Persons Housing</p> <p>The documentation refers to older people and those with disability and their housing but there is no reference about the design of the non-housing elements of a development. Reference to this being a ‘whole life’ and ‘whole community’ developments with a commitment to being dementia friendly would be welcomed. A commitment to the highest standards of dementia friendly town planning and property design is suggested, particularly as there is transferability to other vulnerable adult populations. The RTPI Dementia and Town Planning document provides very useful information on this issue.</p> <p>A commitment not to commute affordable housing into a limited number of developments would be welcomed as well as not seeing housing for older people as the only requirement.</p> <p>Stating that Extra Care Housing and Supported Living would benefit from being located within close walking distance of community facilities (i.e. retail, employment, leisure and health) would be welcomed.</p>	<p>Noted. The SPD is updated at paragraph 2.28 to include this suggestion.</p>

		<p>All of the commitments to green space and leisure are positive as the benefits this has on physical and mental health are well known. The inclusion of allotments is an example that can bring communities together, provide access to green space and horticulture is celebrated for its benefits to health and wellbeing.</p> <p>Commitments to employment opportunities are welcomed as employment is a realistic and important goal for these populations.</p> <p>Public transport links are very important to vulnerable adult populations, as driving for many is not an option (i.e. commitment to walkways and cycle routes to the town centre facilities).</p>	
	<p>Boyer Planning</p>	<p>Q2 – Design Principles</p> <p>2.3 Separation Distances - We welcome paragraphs' 2.5-2.7 of the SPD where guidance shows separation distances and how these can achieve good residential amenity and protect existing and future occupants. We agree with the flexibility set out in paragraph 2.6 because it is essential that each planning application is assessed on its own merits. There are instances whereby a reduction in the separation distance would be acceptable. To ensure the wording of the SPD is consistent in terms of providing flexibility, it should be amended from a minimum distance of 21 metres between facing elevations containing principal windows serving habitable rooms and a minimum distance of 14 metres between a blank elevation to approximately a distance of 21 metres between</p>	<p>Noted. Paragraph 2.6 of the SPD confirms the separation distance are guidelines to be applied flexibly depending on individual merit and site factors</p>

		<p>facing elevations containing principal windows serving habitable rooms and approximately a distance of 14 metres between a blank elevation. This would enable the Council to protect the amenity of existing and future occupants whilst providing the necessary flexibility for individual planning applications.</p> <p>2.4 Off street car parking - We support the inclusion of paragraphs 2.8-2.13 of the SPD as it encourages key factors to consider for the provision for off street car parking and standards in relation to the number of spaces for each dwelling for developments that are close to town centre uses or other locations thus encouraging the use of sustainable modes of transport. Indeed, it is useful for the Council to reiterate the requirements set out in the Leicestershire Highway Design Guide produced by Leicestershire County Council as it assists in streamlining the planning system and making the document user friendly.</p> <p>2.5 Paragraph 2.12 is not however derived from a robust evidence base and the Council should not be seeking for developers to only utilise parking courts if it is unavoidable. If the Council require parking courts to be avoided this needs to be underpinned by evidence that demonstrates they are not effective. Nevertheless, it is agreed that the suggested design guide for parking courts is useful but as highlighted above the Council need to make clear that the guidance is to be applied flexibly.</p>	<p>Parking courts are not being prevented by the SPD. The SPD gives criteria to improve remote parking areas through design.</p>
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		<p>2.9 We do however support that the selection of materials should be related to the character of the area. It is not always possible to achieve similar materials of the surrounding environment. It is important they are chosen carefully in relation to colour and texture so that they do fit well within the surroundings. Therefore new developments should be assessed on the individual merits of an application.</p> <p>2.10 In addition to the above, design is a very subjective matter and it is the role of the Council to provide guidance to ensure forthcoming developments contribute towards achieving good design in accordance with local and national planning policies. It is not the Councils role to provide a detailed and prescribed design criteria. As outlined in paragraph 130 of the NPPF, as the SPD will be a material consideration in the decision making process, planning permission can be refused for development of poor design which fails to take into account any local design standards or style guides in plans or supplementary planning documents. Given the implications of the SPD, it is strongly contended that the wording is amended as outlined above to provide flexibility and to ensure that it's not too onerous on the developer.</p>	
	<p>HDC December 2020 Communities Scrutiny meeting</p>	<p>Accessible housing: given recent reports in the press, can the Council be sure that the SPD is covering the needs of accessible housing in the District?. This would be checked and responded to, but it was noted that paragraphs 2.25 - 2.29 covered this subject.</p>	<p>The SPD does cover specialist housing at 2.25 – 2.29 with reference to the relevant Local Plan policy H4.</p>

<p>3 – Residential development in the countryside</p>	<p>Mr M.Rook</p>	<p>. Where development is requested within (or close to) an area without a curtilage, which may otherwise be interpreted as "open countryside" under current guidance, special cognisance must be taken of the proximity of existing buildings which clearly indicate synergies and compatibility, as if a curtilage did exist, and allow such developments.</p>	<p>Noted. No changes proposed.</p>
	<p>Mr P.Hill</p>	<p>Permission for residential development should take into account the location and environment of the proposed dwelling. If a developer is proposing to put a dwelling in a dangerous or environmentally unsuitable location eg noise, pollution, flooding this should be regarded as a reason to refuse permission or require mitigation measures. The impact of a development on neighbours should also be a factor taken into account, a development should not unreasonably restrain the activities or business of an adjacent property, and any proposed development which may have this effect should be the subject of consultation with the parties affected.</p>	<p>Noted. This type of assessment is carried out by implementing Local Plan policy (GD8 for example). No SPD changes proposed.</p>
	<p>Mr J.Booker</p>	<p>Replacement dwellings, especially on generous plots, should not be constrained to the size and scale of the original.</p>	<p>Noted. The Local Plan provides policy for this assessment and does not include such restriction. No SPD changes proposed.</p>
	<p>Lubenham Parish Council</p>	<p>Neighbourhood plans should be considered when designating development in the Open Countryside. Domestic curtilages of any development in the open countryside need to be defined so as to prevent large scale encroachment.</p>	<p>This is for individual Neighbourhood Plans to consider. No SPD changes proposed.</p>
	<p>Mr J.Booker</p>	<p>Conservation must start with energy conservation as the core principle. Triple glazing should be</p>	<p>New policies such as a triple glazing requirement need to be introduced via a Local Plan. The</p>

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		mandated going forward and external insulation for walls and roofs encouraged.	SPD must refer to existing policies (see accompanying report).
4 – Conservation areas and listed buildings	Lubenham Parish Council	Neighbourhood plans may have specific policies relating to Conservation areas and Listed buildings. Should these be considered to be given a mention	The number and success of Neighbourhood Plans is noted and requires recognition. This is now included at paragraph 1.9 of the SPD.
	Leicestershire County Council	Within paragraph 4.6, it would be beneficial to mention that within Conservation Areas, not only are natural materials preferable but it is also an opportunity to reflect existing features and materials found locally.	This has been added to paragraph 4.6 of the SPD.
5 – Employment and commercial development	Mr P.Hill	Para 5.7 Landscaping The impact of landscaping on neighbouring property should be considered eg tree planting can have a deleterious effect where tall trees intrude into airspace. As a minimum consultation with owners of neighbouring properties should be initiated prior to a decision being made	Advice on the need to take account of neighbouring impact has been added to paragraph 5.7 of the SPD
	Mr Major	For cinemas and conference facilities 1 car parking space for every 5 seats seems rather inadequate as many are likely to travel some distance and public transport is too poor and unattractive especially in the evening	This Leicestershire Highway Design Guide (LHDG) currently states one space for every five seats. No change.
	Scraptoft Parish Council	5.7 Employment and Commercial development. In rural developments the same type of native trees growing within the area should be selected for planting where possible, with the name, girth and height of the trees to be planted marked on plans, this information should then be checked on site after planting has taken place.	The potential for using local native species is added to paragraph 5.7 of the SPD

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	East Leicestershire & Rutland CCG	How many parking spaces will there be for healthcare facilities?	This Leicestershire Highway Design Guide (LHDG) does not currently give a specific figure. No change
	Lubenham Parish Council	Small scale business use of redundant agricultural buildings within smaller settlements may be appropriate to ensure some local economic opportunity for business start-up etc. Please could this be considered.	This has been added to the SPD at paragraph 5.3.
	Mr P.Baildon	5.8 Employment & Commercial Parking again has far exceeded tabled figures/allowances as seen at the Rockingham road where an overflow car-park had to be built to stop the lay-by being used by the Point. NOTHING has persuaded office workers here or anywhere in the District to share cars or use bicycles sufficiently to reduce car use.	Noted. No change to SPD.
	Leicestershire County Council	Paragraph 5.7 should include the following text (highlighted in bold) – “A high standard of landscaping and its subsequent maintenance will be essential to the effective development of employment sites”.	This has been added to paragraph 5.7 of the SPD.
6 – Extensions to dwellings	Mr Hill	para 6.17 neighbours It should be a requirement that developers contact the neighbours rather than a suggestion, failure to provide evidence that they have done so should be a reason to refuse to take matters further until this requirement has been met.	Noted. There is no legislative requirement for this. The SPD cannot add new legislation.
	Mr Baker Adams	This is the best section of the SPD. Clear and precise so all know what will be considered when looking at these applications, good work :)	Noted with thanks.
	Severn Trent	6.3 When building Household Extensions surface water should be directed to a sustainable outfall,	Added at paragraph 6.26 of the SPD.

		<p>avoiding connectivity to the foul sewerage network where possible.</p> <p>6.85 Where gardens are being extended they should retain any existing watercourses as open features, such that the conveyance of water through natural routes is maintained</p> <p>6.91 it should be noted that where extensions would interact with SuDS features in public space or reduce access to SuDS for maintenance they will not be permitted.</p>	<p>Added at paragraph 6.85 of the SPD.</p> <p>Added at paragraph 6.85 of the SPD.</p>
	Sport England	<p>General - need for a reference to the desirability of cycle parking to support active travel? Para 6.90 does the reference to open space include playing fields should para 97 of NPPF be referenced. Sport England would be a statutory consultee on development which impact upon or result in the loss of playing field.</p>	<p>Cycle parking is included at paragraph 5.8 with cross reference to the LHDG....</p> <p>NPPF reference added at paragraph 6.90 of the SPD.</p>
	Mr P.Baildon	<p>6.7 3x6m garage is 5 decades too late. Family cars stopped being small when Morris Minors ceased production. Today's cars cannot use an old garage as the doors will not open to get out and the garage front doors are too small for current people carriers that often resemble small lorries.</p> <p>I was advised by a senior planner in the 1980s that small garages would persuade people to keep buying small economical cars...which script was he reading?</p>	<p>Noted. No change to SPD.</p>
8 - Addressing climate change	Mr Hill	<p>Climate change. Has the council any plans to improve on the statutory minimums required by building standards? Requirements for building to</p>	<p>The SPD cannot introduce new legislation or planning policy to</p>

		<p>passivhaus standards, rainwater harvesting, incorporation of solar PV panels in domestic and commercial buildings could make significant contributions. Additionally a requirement for developers to demonstrate by means of accredited testing that buildings meet the standards required would help improve the quality of construction and reduce the general poor measured performance when compared to design. Further requirements for post occupancy demonstration of building performance during a building's life span would help ensure continued quality and reduce CO2 emissions.</p>	<p>exceed building regulations or obtain other accreditation.</p>
	Mr Hill	<p>Setting firm carbon emission targets for developers to meet would discourage the tendency to produce comprehensive studies that prove that the developer only needs to do the minimum necessary to get permission. Use planning conditions to force developers to meet higher than minimum standards, zero carbon emission buildings are practicable now. Incorporating better public transport into planning and minimising private car use would impact transport. Reversing the policy encouraging distribution warehousing would reduce road transport emissions, engagement with rail companies as alternatives.</p> <p>Insist on independent post construction monitoring to prove the promised design performance and penalise failure.</p>	<p>The suggested target setting is valuable input. However, this SPD cannot introduce targets as that would have to be within Local Plan policy itself subject to examination and viability testing etc..</p>
	Mr Major	<p>1. Electric vehicle charging points should be mandatory for every new house, rather than just asking if they've been considered.</p>	<p>As per comment above this is valuable input. However, this SPD cannot introduce minimum or</p>

		2. Gas boilers for domestic are due to be phased out by national government decree so there should be something more robust than just asking if an alternate has been considered.	alternative provision as that would have to be within Local Plan policy itself subject to examination and viability testing etc
	Severn Trent	8.12 It is noted that this section looks at the reduction in the consumption of Fossil fuel, however there would also be benefits through the promotion of Water efficiency. By implementing water efficient technologies such as taps, showers, dishwashers etc. both water and energy savings can be made because less water used will result in less water needing to be heated. We would therefore recommend that Water efficiency is specified in a separate bullet point driving developers towards the optional target of 110 l/h/d as detailed in building regulations part g	Agreed. Added at paragraph 8.12.
	Anglian Water	The use of water re-use measures including rainwater harvesting can be at a variety of scales not just for individual buildings. Reference should be made to the requirements of Policies H5 and IN4 of the adopted Local Plan in relation to water efficiency for residential developments and water re-use measures for major developments.	Agreed. Added at paragraph 8.12.
	Mr Booker	Householder applications to fit external insulation to existing stock should be incentivised and encouraged as a key method to upgrade existing stock from the poor efficiency which characterises the District. The aesthetics of this will be transformative in many locations and the policy	As per comments above this is valuable input. Such insulation is known to have been done at housing stock across the district. However, this SPD cannot introduce new provision as that would have to be within Local Plan

		should embrace and guide this change rather than ignore it as it does at present.	policy itself subject to examination and viability testing etc
	Mr Rowlands	Section 8 Climate Change - excellent planning considerations here: 8.3 carbon emissions reduction, 8.4 carbon neutrality, 8.6 decentralised/renewable energy, 8.8 electric-vehicle charging, 8.9 ultrafast broadband, 8.10 recyclable construction materials, carbon emissions minimised, energy efficiency improvement, 8.11 green infrastructure, 8.12 passive design, energy performance, heat pumps, renewable energy, battery storage, electric vehicle charging, sustainable transport. I would expect to see HDC Planning requiring positive measures as above to be shown on all planning applications before approval, such that real improvements are made to housing stock from now on, to counter the slow progress on this over the last few years.	Noted with thanks.
	Boyer Planning	Whilst we support the Council's policy approach towards addressing climate change however the SPD as a guidance tool does not encourage developers to provide carbon neutral developments and is rather prescriptive.	Noted.
	Leicestershire County Council	Addressing Climate Change It is suggested that climate and carbon objectives would ideally be integrated across the document rather than sitting in a separate chapter, as all aspects of development will need to address the net zero carbon targets and seek to adapt to inevitable consequences of climate change.	Noted. This is useful comment and in effect is how proposals shall be considered. For the SPD it is a suitable method of presentation to utilise one chapter. No change.
	Boyer Planning	Q8 – Addressing Climate Change	

		<p>Whilst we support the Council’s policy approach towards addressing climate change and committing towards reducing carbon emissions by 80% by 2050, the SPD as a guidance tool does not encourage developers to provide carbon neutral developments and instead stipulates the standards that are expected from the Council, which could benefit from further explanation on how such standards could address the effects of climate change.</p> <p>These standards increase the onus on developers to deliver the outcomes and could potentially affect the viability of the development further impacting on housing delivery rates.</p> <p>2.16 Whilst we fully support that major developments should assist in mitigating the effects of climate change, this can be achieved through good design principles. Although the SPD seeks to achieve this, we do not support the current wording used in this section and recommend further explanation is inserted as guidance, providing a flexible approach that developers could use with good practice guidance. For example:</p> <ul style="list-style-type: none"> • Design of buildings should seek to become weather resilient to unexpected rainfall, including raised floors / electrics if appropriate • Promoting low carbon design approaches to reduce energy consumption in buildings, through the design of building layout and orientation to help maximise solar gain and minimise the need for heat. <p>.</p>	<p>Noted as constructive feedback about content and its presentation. At this stage the SPD reflects current Local Plan policy and no further change is proposed.</p>
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	Environment Agency	Q8 – The Environment Agency welcomes the advice provided in section 8.	Noted with thanks.
9 – Conversion of redundant and disused buildings	Mr Rook	In general the guidance on conversion of rural buildings seems well conceived and thought through. However, the guidance must be flexibility for Planning Officers to sanction "Modern Living" requirements needed in any such redevelopments as individual case studies might show. Thus, for instance, fenestration a road-side aspect of a barn conversion may benefit modern living if it allows roof-space use, or individual wide-aspect glass from certain quarters serves to enhance the enjoyment of far-reaching views. The ship should not be sunk on the rocks of planning guidance shackles.	Noted with thanks. The SPD is guidance as opposed to rules
	Mr Hill	para 9.39 Permission for conversion of existing building should take account of the location and surroundings and any impact that the change of use may have. on neighbours. A change of use of a building may have safety and amenity issues that were not a problem in the original purpose, equally there may be an impact on a neighbouring property or business. Consultation with neighbours should be mandatory and permission refused until this has taken place.	Noted. These issues are considered at planning application stage and covered by Local Plan policy GD8. The SPD cannot add to the policy.
	Mr Major	Where derelict or semi derelict buildings have stood empty for say a 3 year period and the owner has failed to do anything useful with that building then it should be subject to compulsory purchase and redeveloped even if it means removing a building that has listed status. There's no point in persisting	Noted. This suggestion is to introduce new legislation which the SPD cannot do.

		with requiring a building to remain unchanged if it's falling down or has no useful purpose..	
	Scraptoft Parish	9.5 Though this paragraph is very good, there still appears to be a considerable number of houses being demolished and completely rebuilt within the district, due to loopholes that allow developers to circumvent the legislation.	Noted with thanks. No change to the SPD.
	Mr Booker	The tone of the proposed policy is to suffocate the re-purposing of redundant buildings with sentimental aspirations which do nothing to optimise the building for its new function.	Noted. No change to the SPD.
10 – Landscaping and development	Mr Rook	Landscaping has often become the Cinderella of planning applications. Interim policing of final landscaping requirements, a deposit in kind or cash, together with a time constraint for completion and handover, must be more rigorously applied by the LPA. Too often proper landscaping has been lost in translation due to the impracticality of enforcement late in the day.	Noted. No change to the SPD.
	Severn Trent	10.05 should also include a bullet point to highlight the benefits that good landscaping incorporating SuDS can also assist with Flood Risk 10.13 Amend Green Infrastructure to - Green Blue Infrastructure to highlight the need for consideration of water through the natural environment, helping to deliver sustainability, flood resilience and biodiversity. 10.47 There is an opportunity to highlight additional benefits form flood risk mitigation that could be	This has been added to the SPD. This has been added to the SPD. This has been added to the SPD.

		created through the use of tree pits to attenuate surface water, if undertaken correctly this approach can help the new trees to flourish and mitigate some flood risk.	
	Sport England	para 10.18 The provision of formal sports facilities on development requires detailed assessment and an increased level of future maintenance. For example the installation of a new cricket facility with a public area or adjacent to sensitive land uses may involve the need for a ball strike risk assessment.	This has been added to the SPD.
	Scraptoft Parish Council	10.24 Trees and shrubs should be planted in the correct season and may require water in dry conditions over their first year after planting, which is not consistently adhered too.	This has been added to the SPD.
	Leicestershire County Council	<p>Section 10 (Landscaping and development) would benefit from consideration to the creative use of water and Sustainable Drainage Systems (SUDS). Within Paragraphs 10.7 – 10.9, it recommended that reference is made to the requirement for biodiversity net gain and the design of green spaces.</p> <p>Paragraph 10.16 should include the following text (highlighted in bold) – “Where practical, existing features should be retained, protected, and incorporated into the layout of the site.”</p> <p>Within Paragraphs 10.19 – 10.22 it would be beneficial to mention that where tree planting is such a fundamental part of the proposed street scene, consideration should be given to increasing the verge widths or setting back the building line in order that sufficient space is available to plant large growing native trees through the development.</p>	<p>Sustainable Drainage references have been added to the SPD.</p> <p>Biodiversity net gain is not a current Local Plan policy requirement. No change to SPD. This text is now included in the SPD.</p> <p>The importance of street trees is referenced at paragraph 10.20 of the SPD. More detail would be overly prescriptive.</p>

		<p>Within Paragraph 10.24 it is recommended that an additional bullet point is added stating: “Damage caused by failure to remove tree and shrub shelters – Trees and shrubs can be easily damaged by shelters left on for too long after plant establishment. Provision needs to be made for the removal of tree and shrub shelters at the appropriate time (unless biodegradable)”.</p>	<p>This has been added to the SPD.</p>
	<p>Leicestershire County Council</p>	<p>Paragraph 10.20 currently states “Street trees should be included as part of the landscape design for all developments. This is not a statement that LCC can support (unless it is suggesting that these trees will not form part of the public highway). Incorporating landscaping within the adoptable public highway require certain street design characteristics which will not be achievable within all development sites. Equally, the planting and ongoing maintenance of trees as part of the delivery of adoptable development roads is often problematic, with the end product falling a long way short of the intended quality and vision proposed for approval in the planning arena. Any street trees proposed in the highway will require the developer to contribute towards the future maintenance of them via the commuted sum process under the legal agreements to adopt under Section 38 of the Highways Act 1980. In addition, where the document refers to planting in the highway, there should be reference to the need to maintain visibility splays.</p>	<p>Noted. Street trees have since these comments become specifically introduced to the NPPF (July 2021). Paragraph 131 states that planning policies and decisions should ensure that new streets are tree-lined. No change to the SPD.</p>
	<p>Boyer Planning</p>	<p>Q6.Landscape and Development</p>	<p>Noted with thanks.</p>

		2.18 We support the detailed guidance in this section.	
	Environment Agency	<p>Q10 – Paragraph 3. The draft Environment Bill makes clear that new development must incorporate biodiversity net gain (bng). Developers should be advised of this requirement at the earliest stage of the planning process through appropriate planning guidance and this includes the Development Management SPD. We therefore consider that the following changes should be made to heading 3. and the wording of subsection 10.16:</p> <p>“3. Are existing site features protected, enhanced and extended within the proposed layout of the development?”</p> <p>“Where practical, existing features should be retained and incorporated into the layout of the site. Biodiversity net gain should also be provided as part of the development proposals.”</p> <p>“Does the site have existing ecological value or certain habitats which need to be protected, enhanced and extended as part of the development?”</p>	Noted. The Environment Bill is yet to become legislation. If it does as described here it will be for Local Plan policy to make changes as the SPD cannot do that.
	Mr Booker	The key phrase is "Harborough District Council is committed to maintaining and improving the District's shopping streets and centres", which is to completely ignore the fact that the District has too many shops as needs a policy for re-purposing it's excess shops and commercial property to maintain it's rateable income, and vibrant purpose. Planning should facilitate change not stymie it. Shopping and distribution have changed and continue to evolve,	Noted. No change to the SPD.

		this policy is not relevant to the current situation, never mind the future situation.	
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