



Harborough District Council
LDF Core Strategy (Publication Version)

**Schedule of Representations
Received**

January 2011

Introductory Notes

This document "Schedule of Representations Received" provides a verbatim record of representations received following the publication of the Harborough District Local Development Framework Core Strategy October 2010 and made between 15 October and 23 December 2010.

The representations are listed by reference to the appropriate Chapter/Policy number where possible.

Each representation consists of

1. An individual reference number eg 3575/111 (3575 being the representor reference and 111 being the individual representation number)
2. The representation made by the relevant individual or organisation.
3. The change to the Core Strategy being suggested in the representation as a means of resolving the issue raised (note that this is not at present being suggested by the Council)

The Council has considered the main issues raised in these representations and has reported these to the Council pending consideration of submission of the Core Strategy to the Planning Inspectorate for Examination.

The Councils detailed response to the issues raised by the representations including any changes will be published during the examination process as required by the Inspector

This Schedule of Representations, along with the original representations and other documents as required by Regulation, will be submitted to the Planning Inspectorate

For further information please go to

http://www.harborough.gov.uk/site/scripts/documents_info.php?categoryID=856&documentID=216#pagenav

or contact the planning policy team on 01858 821160

or planningpolicy@harborough.gov.uk

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Representor ID	Representor Organisation	Number of Reps Received
2048	A Walter Smart & Son	2
2037	Aldi Stores Ltd	1
2057	AMOS	3
2075	Andrew Granger & Co on behalf of various clients	2
2053	Anglian Water	1
2041	Barratt Strategic	5
2044	Barratt Strategic	5
3613	Billesdon Parish Council	10
2081	Bitteswell Parish Council	55
2008	Blaby District Council	3
3617	Bovis Homes	8
3646	British Waterways	3
3675	C Walton Ltd	1
3640	CASCET - Campaign Against the Stoughton Co-op Expansion Threat	4
2063	CHRIS FREEMAN DESIGN LTD	3
2015	Civil Aviation Authority	1
3590	Claybrooke Magna Parish Council	8
2087	Cllr B Pain	1
2009	Cllr G Spendlove-Mason	3
3438	Cllr M Rook	8
2089	Cllr S Galton	3
2020	Cllrs Golding, Dann and Liquorish	1
2026	Compass Group	4
2076	Compass Group Great Bowden	3
2058	Constable Maxwell	3
3677	CYO Seeds	2
2045	David Wilson Homes	5
2029	Davidsons Group	13
2066	Davidsons Group Ltd	12
2067	Davidsons Group Ltd	6
2034	De Montfort University	4
3625	Derbyshire Gypsy Liaison Group	1
3484	Dr J Osborne	1
3628	Dr K Feltham	15
3684	Dunton Bassett Parish Council	2
2069	East Midlands Councils	1
2021	East Midlands Housing Group	7
2007	English Heritage	5
3523	Environment Agency	1
2086	Equality and Human Rights Commission	1
3685	Fleckney Parish Council	3
2031	Foxton Parish Council	4
3610	Gazeley UK Ltd	1
2025	Great Glen Parish Council	4
2028	Hallam Land Management	1
2047	Hallam Land Management Ltd	1
2010	Highways Agency	1
2030	Hinckley & Bosworth Borough Council	4
3499	Houghton On The Hill Parish Council	1
3657	Jelson	7
3679	John Martin Associates	2
2019	Kibworth Beauchamp Parish Council	4
2024	Kibworth Harcourt Parish Council	3
2083	Lafarge Aggregates Ltd	4

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2038	Langtree Group PLC	6
2033	Leicester City Council	3
2073	Leicester Diocesan Board of Finance/Carr/Bowie/Murmann/Johnson	7
2068	Leicestershire and Rutland Wildlife Trust	3
2055	Leicestershire County Council	55
3353	Leicestershire Fire and Rescue	3
2005	Leicestershire Police	4
2011	Limetree Real Estates	6
3620	Lutterworth Town Council	11
2017	Merton College Oxford	1
2003	Ministry of Defence	1
3601	Mowsley Parish Plan Group	1
3665	Mr & Mrs Crane	5
2039	Mr & Mrs Woodcock	5
3659	Mr A Keshwara	3
3534	Mr A Taylor	1
2082	Mr B Bosworth	1
2077	Mr D Mason	8
3518	Mr G Hill	1
3467	Mr J Bayliss	1
2014	Mr J Marlow	2
3607	Mr J Turner	3
3606	Mr M van Oppen	1
3656	Mr N Horton	1
3678	Mr N Lane	3
3668	Mr N Renner	6
2072	Mr P Hill	1
3670	Mr P Johnson	1
2080	Mr P Maxwell	3
3434	Mr R Egdson	1
2001	Mr R Jones	1
3539	Mr R Mitchell	1
2084	Mr R Morris	1
2023	Mr R Taylor	4
2059	Mr S Nanuwa	3
3276	Mr S White	1
2070	Mr T Frosdick	1
2027	Mr T Smith	1
2079	Mrs A Snell	1
2078	Mrs D Root	1
3519	Mrs G Hill	1
2060	Mrs J Eastwood	3
3509	Mrs J McVeigh	1
2074	Mrs P Hays	4
3653	Mrs R Black	2
2002	Ms A Read	1
3602	Ms C Renner	5
2062	Ms R Page	10
2088	Ms S Clarke	1
2052	National Grid	1
2049	National Trust	3
2085	Natural England	7
3605	North Kilworth Parish Council	1
3575	Oadby and Wigston Borough Council	10
2064	Persimmon Homes North Midlands	11
2061	Pilkington Trust	3

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2046	SAINSBURYS SUPERMARKETS	1
2016	Scraptoft Parish Council	1
2006	Slawston Parish Council	1
3570	Sport England	1
2043	Stamford Homes Ltd	2
2013	Swift Valley Partnership	2
2004	The Coal Authority	1
2035	The Leicester Diocesan Board of Finance	1
3454	The Owners of Overstone House	3
2051	The Theatres Trust	4
3639	The Woodland Trust	1
2032	Thurnby & Bushby Parish Council	7
2018	Thurnby and Bushby Society	16
2012	Transition Harborough	1
2056	Trustees of the Bowden Settlement	3
2065	Trustees of the Bushby Settlement c/o Mather Jamie	17
2042	Western Range	5
2040	Westleigh Developments Ltd	7
2054	Wheatcroft & Son	5
2036	William Davis Limited & Hallam Land Management Limited	5
2050	William Davis Ltd	5
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Chapter 1 Introduction Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2077/465	Mr D Mason		<p>The development documents contained in the LDF will provide the directions through which changes in the District from now until 2026 and beyond will be achieved, the Annual Monitoring Report will here be key. I trust that the Annual Monitoring Report will be compiled by a separate and independent inspectorate/team, a team which will have no responsibility in rectifying shortfalls or the like: the man set to find and also rectify defects will only find what he can fix within allotted time and his own abilities. Whilst not an essential element of this document, the inclusion of the name of the District Council Officer specifically responsible for overall monitoring compliance would have been welcome.</p>

Chapter 2 Spatial Portrait Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
3575/111	Oadby and Wigston Borough Council	The 'Leicester Urban Area' is not a term that is widely recognised outside of Harborough district and needs to be defined. Although the text would assume that the Leicester Principal Urban Area within the Borough of Oadby and Wigston is included in the definition of the Leicester Urban Area this is not clear.	Define 'Leicester Urban Area'.
2033/172	Leicester City Council	The term 'wider Leicester urban area' is not defined and elsewhere in the document there are references to the 'Leicester urban fringe'. Such new terminology could be confusing when the RSS identifies the Leicester Principal Urban Area and that term is used in the adopted Leicester, Oadby and Wigston and Hinckley and Bosworth Core Strategies. Following the High Court challenge to the revocation of the RSS, the East Midlands Regional Plan (RSS) still forms part of the Development Plan. Although the City Council accepts that the RSS may have been abolished by the time this Core Strategy is adopted, the term 'Leicester Principal Urban Area' is used in the adopted Core Strategies local authorities adjoining Harborough District. By not defining the Leicester Principal Urban Area this Core Strategy is not effective because it does not have coherence with the strategies of neighbouring authorities.	Replace the term 'wider Leicester urban area' with Leicester Principal Urban Area'
2040/226	Westleigh Developments Ltd	Growth in Broughton Astley since 1991 has not been matched by the provision of local services and facilities. The comments set out in the above paragraphs are supported and the inclusion of this within a Key Issue (EC.8) reflects its importance to the community of Broughton Astley, a key centre in the District. The provision of new employment, retail and leisure facilities together with essential services such as doctors and dentists surgeries is important to the economic and social well-being of all communities in the district, particularly the key centres such as Broughton Astley that have a large rural hinterland. The development of the Coventry Road site for a mixed use development including employment, retail, leisure facilities and community uses by an excellent local developer as described in the accompanying promotional document offers an excellent opportunity to address the issues identified in these paragraphs of the Core Strategy.	
2041/233	Barratt Strategic	Growth in Broughton Astley since 1991 has not been matched by the provision of local services and facilities. The comments set out in the above paragraphs are supported and the inclusion of this within a Key Issue (EC.8) reflects its importance to the community of Broughton Astley, a key centre in the District. It is important that new developments do not exacerbate the issue and it is suggested that all new residential developments with the village should provide all the necessary infrastructure and contributions reasonably required by the local planning authority. It is intended that the Frolesworth Road residential development which Barratt Strategic are promoting would do this, with the provision of up to 30% affordable housing and contributions towards open space maintenance, education and public transport (please see accompanying promotional document).	
2051/309	The Theatres Trust		Although we note at para.2.3 that Harborough relies upon Leicester to provide access to cultural facilities there is very little leisure content in the document for residents and visitors and we would have expected more detail for the protection and enhancement of existing venues for leisure and cultural interests and activities. Cultural events are not solely dependent upon PPG17 which does not include art galleries or theatres.
2055/323	Leicestershire County Council	This paragraph could be read to mean that CO2 levels are the cause of air quality problems in Lutterworth. This would be inaccurate because NO2 levels are the issue.	Suggest rewording: "Other emissions, especially of Nitrogen Dioxide, are of particular concern in the centre of Lutterworth....".

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2011/44	Limetree Real Estates	(Para.2.16) The importance of this issue to the economy of the District is recognised and it is suggested that it should be addressed by a planned release of additional sustainably located sites for employment development. It is intended that the development of sites such as the land west of Rockingham Road, Market Harborough, which is the subject of the enclosed Promotional Document, would assist in this regard.	
2011/45	Limetree Real Estates	(Para.2.1) The split between the different use classes indicates the heavy reliance of the District on storage and distribution and the weakness of the knowledge economy and office based employment. It is considered important to address this imbalance with the planned release of additional sustainably located sites for employment development. It is intended that the development of sites such as the land west of Rockingham Road, Market Harborough, for office and B1/B2 purposes as indicated in the enclosed Promotional Document, would assist in this regard.	
2080/479	Mr P Maxwell	Para 2.21 to 2.23. This is a useful reference to recent experience which brings two thoughts to mind. If you visit The Point development in Rockingham Road, you will quickly see the inadequacy of car parking provision. For me this suggests that many people want or have to travel to work by car. A number, I suspect, additionally, drop off or collect children from school or nursery on the way. The public transport provision to Rockingham Road, a significant entry road to MH, is totally inadequate. The Magna Park references indicate that employees can and do travel significant distances to the site. What lessons have been learnt from these experiences? References in the strategy to the Strategic Housing Development talk (vaguely) about reducing travel by having adequate employment opportunities, high quality public transport and links etc. Recent history suggests that this will not be achieved and/or that no account has been taken about why people choose to buy property in particular locations. To obtain a mortgage, they will probably already have to have a job. So to fulfil the Strategy do you not have to provide employment opportunities in advance of the housing? If you look at The Compass development in Northampton Road you have an incomplete and, seemingly, stagnant site. What evidence is there that the Strategic Development site will be any better at encouraging sufficient new employers to the site bearing in mind that there might be say 1000 plus potential employees living there? What range of employment opportunities does the Strategy wish to encourage in Harborough district? Should not this be part of the Strategy?	
2080/480	Mr P Maxwell	I am amazed that the current traffic problems of Market Harborough Town Centre are not identified as a specific issue that needs to be addressed. In fact there is a lamentable lack of concern about the impact the Strategic Housing Development will have on this.	
2081/494	Bitteswell Parish Council	The paragraphs on these pages rehearse what has become a chronic problem for the District: the mismatch between the skills of the residents and the employments opportunities available to them. This drawback is acknowledged in para. 2.16. Moreover, to the extent that there is employment, the figures offered in para. 2.24 would indicate that Harborough could be portrayed as a 'Cottage Industry' District. The distortion of the employment profile arising from the centre of gravity for jobs being in the storage and distribution arena represents a continuing difficulty. The divergence between the available employment in the District and the skills of the indigenous workforce is an issue in urgent need of redress. The Harborough Employment Land Study by Nathaniel Lichfield and Partners revealed that over half of the resident workforce commuted to work outside of the District, and that this proportion is increasing. The out-commuting is primarily to knowledge-based or other skilled jobs and reflects the lack of such occupation in the Harborough District.	

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
		<p>There is also a high level of in-commuting of workers engaged in mainly unskilled employment, for example, at Magna Park. The extent of this commuting is manifestly incompatible with any strategy that pretends to the promotion of sustainability. The underlying difficulty springs from an inordinate increase in the unskilled jobs in the Harborough District, primarily arising from expansion of storage and distribution facilities. For example, Magna Park alone accounts for some 20% of all jobs in the District. There is an evident need for a material shift in the approach of the District Council to employment land allocations if it is to procure a better balance between the skills of its residents and the available employment.</p>	
2083/561	Lafarge Aggregates Ltd		<p>We would recommend that additional wording is included within Strategic Objective 5 to include the safeguarding of natural resources (including minerals) from inappropriate development. This would reflect the advice at paragraph 13 of MPS 1 which states that Local Development Documents should identify mineral safeguarded areas and safeguard valuable mineral resources. We would welcome the opportunity to be consulted upon the further Site Allocation DPD to advise on potential mineral safeguarding issues.</p> <p>Strategic Objective 5 reflects the need of paragraph 2.30 which identifies that Harborough like much of Leicestershire is relatively poor in biodiversity and geodiversity terms. In addition, Policy 1 (part N) and Policy 8 emphasise the importance of enhancing green infrastructure assets (in particular river networks). In our opinion, the restoration of mineral sites can play a key role in maximising opportunity for biodiversity and habitat improvements which could be better reflected in the strategic objectives or these policies.</p>

Chapter 3 Vision and Objectives Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2005/10	Leicestershire Police	I think it would help to pick up on the community safety strand from our local Community Safety Partnership work to support the Core Strategy objective.	Add short para to say “a number of local partners work together in the local Community Safety Partnership and are committed to reducing crime, the fear of crime and developing a sense of safety for all and to implement the local Community Safety Plan to achieve this”. This is an addition that will make the Strategy more Sound
2021/88	East Midlands Housing Group	We support the overall vision and objectives set out in the section and in particular the reference to meeting the need for good quality affordable housing.	
2018/79	Thurnby and Bushby Society	Harborough Core Strategy Strategic Objectives 9: To reduce the environmental impact of road traffic, lessen the need for car use and encourage alternative modes of transport: This should be the objective of all further planning policies.	
2011/46	Limetree Real Estates	<p>(Para.3.6) The strategic objectives of the Core Strategy set out in the table in paragraph 3.6 are supported as is the means of maintaining the balance between the rural character of the District and the need for sustainable growth. However, it is considered that the need to allocate new employment land is of particular importance if the current high levels of out commuting for employment are to be addressed.</p> <p>The requirement that previously developed land (PDL) be prioritised for all development through a sequential approach is not considered to be justified or in accordance with national policy. The development of greenfield sites, particularly for employment purposes, has successfully delivered employment opportunities in the District, including development at The Point and Peaker Park on Rockingham Road in Market Harborough. Prioritising PDL sites would discourage employment development due to the additional development costs and restrictions on supply that this would give rise to. It is considered that this would be at precisely the time when economic growth needs to be stimulated to aid the recovery.</p>	Delete the reference to prioritising the development of previously developed land in Policy 1.
2077/467	Mr D Mason		Community I take to mean all the District residents, but more realistically of the 83000 residents perhaps any one of 75% of these people may possess a 'show stopping' idea. Further, it can be seen as a Council responsibility to canvass residents for inputs. A simple questionnaire to every household aimed at determining a. which households would like to be kept informed of or consulted on the Districts development plans b. the opinions and view of younger people - the inheritor of outcomes etc.
2014/56	Mr J Marlow	<p>Para.3.6: One important area of activity that does not emerge with any clarity in the Core Strategy is the broad issue of Public Health in the wake of substantial change within the operations of the National Health Service; i.e. the pattern of distribution, location and presumed catchment areas for General Hospitals, Community Hospitals and other all-important facilities at a more local level. Indeed, it is apparent, for example, that the people of Leicestershire are not well served in the availability of hospice accommodation and the location of such facilities (and their number) should be the subject of more active consideration when approaching patterns of future development for large settlements in the Harborough District.</p> <p>I do believe it to be a fact that, for no good reason, District and Local Plans had dropped any consideration of the future location, extent and site area to be occupied by new hospitals. It is a mistake and a paradox when public transport within Leicestershire is so poor and when the stated intent behind strategy statements is to seek to avoid excess use of the private motor car.</p>	<p>I do consider that an addition should be made to the community based objectives within the document. There will be similar issues across the District, but patients, carers and their relatives have current concerns about the future of the Fielding Palmer Hospital at Lutterworth, Broughton Aslley and surrounding villages. If closure is intended then it would appear that the only likely alternative will be a long journey to the new Hospital site at Ashby Road, Hinckley.</p> <p>This is a clear example of the need to address Community Health provision in terms of the pattern of future growth on the part of established hospital sites. West to east public transport patterns are poor and a journey from Broughton Aslley to Hinckley by bus requires a route via Lutterworth. Hospice accommodation within Leicestershire is insufficient and new sites should be considered. Thereby Key Centres should emerge as potential locations.</p>

Policy 1 Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2025/106	Great Glen Parish Council	The Council commends the proposal to safeguard the identity of Scraptoft and Thurnby/Bushby.	The Council strongly requests that the proposals to safeguard identity are extended to include specific mention of Great Glen.
2025/107	Great Glen Parish Council	Why is Great Glen identified as requiring further development as a Rural Centre and as a focus for rural housing, additional employment, retail and community uses given that it has already had 29 + 281 houses agreed in 2009/10 - can HDC provide justification for this section please?	
3575/112	Oadby and Wigston Borough Council	Overall, the Spatial Strategy contained within the Harborough Core Strategy – Publication Draft is supported. The growth that is proposed near to the Borough within and adjacent to the Leicester Principal Urban Area is considered to be sustainable; fits well with the Spatial Strategy for the Borough of Oadby and Wigston and in the wider context of the Principal Urban Area to the south east of Leicester; and, takes account the impact of development in Harborough district on key places within the Borough of Oadby and Wigston, such as Oadby district centre. Support the spatial strategy in relation to: • the location of development within and adjacent to the Leicester Principal Urban Area, particularly in relation to ensuring that growth does not undermine the regeneration and development objectives of Oadby and Wigston Borough where many residents of the north eastern parts of Harborough district access local services and facilities. • The spatial strategy for growth throughout the district which takes account of the wider spatial planning context in the south east of the Leicester Principal Urban Area and in particular takes account of the retail hierarchy of the Leicester Principal Urban Area; limiting congestion on the east/west routes throughout the Borough of Oadby and Wigston; and, the limitations to the public transport capacity of the A6.	
3575/113	Oadby and Wigston Borough Council	Paragraph 5.54 implies that Kettering and Rugby are higher order centres than Market Harborough which is not the case. Paragraph 5.58 refers to limiting retail development in the Leicester urban fringe area of Scraptoft, Thurnby and Bushby to local shopping and service provision thus supporting Leicester city centre and a number of other objectives.	It would provide greater clarity if Wigston town centre were also referred to in this paragraph. Wigston is the only town centre in the southern part of the Leicester Principal Urban Area that lies between Market Harborough and Leicester city. This would provide an appropriate link to Policy 1, paragraph D. It would also provide greater clarity if Oadby district centre were also referred to in this paragraph. This would provide an appropriate link to Policy 1, paragraph D.
3454/20	The Owners of Overstone House	I support the spatial strategy that concentrates development at Market Harborough. Market Harborough represents a sustainable location for new development, being the largest settlement in the District and benefitting from good public services and public transport links. The spatial strategy therefore accords with Government guidance that promotes sustainable development.	
3438/24	Cllr M Rook	Seeks to protect rurality. Housing numbers evidenced. Supports enhancement of exiting urban areas. Identifies need to maintain the separation of communities with green wedges. Provides the rationale for housing the locations decided upon in the rest of the document.	
2019/84	Kibworth Beauchamp Parich Council	Part e) The wording should be amended to 'enhance' the Green Wedge designations instead of 'support'. The 'Making your representations guidance notes' item 3.5 states the Core Strategy should be flexible. The change suggested would allow new green wedges to be created, Kibworth Beauchamp Parish Council would also request that the area between Kibworth	The wording should be amended to 'enhance' the Green Wedge designations instead of 'support'.

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
		Beauchamp and Smeeton Westerby be designated as a green wedge.	
2021/89	East Midlands Housing Group		Note the areas identified for future housing growth and priority for previously developed land. In section I) we would suggest a reference to meeting the needs of BME communities across the district. Also we support m) which refers to rural affordable housing.
2029/129	Davidsons Group	<p>It is considered that the Core Strategy is unsound because the planned time horizon for the document will be less than 15 years from the date of adoption to the end of the monitoring year 2026. This fails to conform to national planning policy set out at paragraph 4.13 of PPS12.</p> <p>Paragraph 1.8 and Table 1 of the document sets out that it is expected that the expected adoption date is late 2011. In terms of housing delivery this is well into the monitoring year 2011/2012. A 15 year time horizon would take the Core Strategy into at least 2027.</p> <p>The time horizon has particular significance for the delivery of housing. PPS3 paragraph 53 requires that “local planning authorities should set out in their Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption.” Given that the proposed Core Strategy does not actually allocate any specific sites to deliver housing, the time horizon of the Core Strategy should take account of the time required to prepare and adopt subsequent documents that will perform this role. In the context of the Harborough Local Development Scheme, the relevant document is the Allocations Development Plan Document and accompanying proposals map, together with a Community Infrastructure Levy Charging Schedule. An horizon of 2026 clearly does not allow sufficient time for the preparation and adoption of these documents, and therefore the proposed time horizon set out in Policy 1(a) of the Core Strategy fails the test of soundness on account of its lack of conformity to national planning policy.</p> <p>The housing requirement set out in Policy 1(a) is consistent with the housing requirement set out in the adopted East Midlands RSS. This plans for the period to 2026. As the planning period of the Core Strategy should extend beyond 2026, the housing requirement should also be increased in order to deal flexibly with meeting long terms housing needs in the district. The 2033 household projections are available and should form the basis of a revised housing requirement that reflects the longer time horizon of the Core Strategy. This would ensure that the Core Strategy is justified and effective in terms of deliverability and flexibility.</p>	<p>The Core Strategy should work to a time horizon beyond 2026. A time horizon of 2028 reflects a twenty year period from the base year of the most recently published national household projections (2008), and gives the Council until April 2013 to adopt the necessary Development Plan Documents to allow a continuous supply of housing for a 15 year period in accordance with PPS3. Indeed, this timescale accords with the Council’s most recent draft Local Development Scheme (reported to Executive Committee December 20th 2010).</p> <p>The additional 2 year period and the associated additional housing requirements are not considered to be so significant to require substantial review of the Core Strategy preparation and would entail a scale of additional development which would not be so significant to require fresh assessment of its impacts.</p> <p>To achieve soundness, the housing requirement of the plan set out at Policy 1(a) needs to be revised to take account of a time horizon to 2028. On the basis of the Council’s adopted position at July 2010, this would require a further 700 dwellings across the plan period 2006-2028.</p> <p>In the light of the above the following changes are required: •Amend second sentence in paragraph 1.7 to read: “It sets out a long term spatial plan for the District and its communities to 2028 and beyond and explains how change will happen”. •Amend Policy 1(a) to read: “Policy 1: Spatial Strategy for Harborough</p> <p>To maintain the District’s unique rural character whilst ensuring that the needs of the community are met through sustainable growth and suitable access to services, the spatial strategy for Harborough to 2028 is to:</p> <p>a)Enable the development of 7,700 dwellings across the District during the period 2006-2028;</p> <p>These changes also need to be reflected in amendments to paragraphs 1.7, 1.8, 5.5, Table 2, Policy 2, Table 3, Table 4,</p>
2030/134	Hinckley & Bosworth Borough Council		If the word 'housing' is missing in error then this should be inserted.
3668/142	Mr N Renner	We support the continued allocation of Green Wedges and the area of seperation. The boundaries of these allocations should remain as they are at present to continue the effectiveness of the policy.	

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
3677/157	CYO Seeds	CYO Seeds support the general principles of Policy 1: Spatial Strategy for Harborough. In particular points j) and k) are supported where reference to the allocation of new employment land within the Allocations Development Plan Document (DPD) and to the identification of existing sites of important employment use is made. It is considered that employment sites such as CYO Seeds in North Kilworth should be identified within the Allocations DPD as an existing site of important employment use. Furthermore, a small parcel of land to the east of the existing CYO Seeds site should be allocated to enable the business to expand in its current location. Representations to this effect will be made to the Allocations DPD.	It is considered that employment sites such as CYO Seeds in North Kilworth should be identified within the Allocations DPD as an existing site of important employment use. Furthermore, a small parcel of land to the east of the existing CYO Seeds site should be allocated to enable the business to expand in its current location. Representations to this effect will be made to the Allocations DPD.
3679/158	John Martin Associates	Our client considers that this part of the Core Strategy – Proposed Submission Version is Sound, in terms of its justification, effectiveness and consistency with National Policy. 1.2 In broad terms the emerging policy framework for the new plan is supported. However, the new plan also needs to safeguard and improve village facilities, promoting the growth of vital and sustainable rural communities. 1.3 Our client supports the objective in Policy 1 to bolster the economy of both rural areas by modest scale new development, together with giving focus of additional development within Market Harborough. Support is given to the general thrust of the dispersed approach to development within the District within a hierarchical structure. 1.4 However, in respect of the broad distribution of dwellings across the Harborough District administrative area, the spatial strategy is heavily biased towards new development in and around the urban area of the Market Harborough. 1.5 In terms of promoting housing development on sites within the District, the contrast in the strategic interpretations of rural sustainable development arises with regard to the problem of meeting rural housing needs. On the one hand, there is conclusive evidence of a severe shortage of affordable housing in rural communities which is not only creating hardship and social injustice, but also undermines the Governments’ aim of creating mixed communities of income and occupation; and to meet the needs of key workers such as teachers, health workers and others to live close to their work. On the other hand, planning policies are generally very restrictive in rural areas in order to protect the countryside, reduced car journeys to urban centres and concentrate new housing near urban services. 1.6 New housing schemes tend to be limited to small exception sites for “affordable housing” on the edge of villages which usually involve complex and time consuming procedures. Mixed market and affordable housing developments tend to be limited to larger villages and market towns, for the same reason. The result is that many thousands of small villages risk being condemned to virtual stagnation, affluent but aging ghettos, far from the sustainable, mixed communities which the Government seeks to foster. 1.7 In our view, there is a conflict between the needs to meet the social and economic requirements and sustainability of rural communities through the provision of affordable housing, as expressed by the Affordable Housing Commission and PPS3; and the general planning policy of concentrating development in urban areas in order to minimise travel carbon emissions - typically expressed through Regional Spatial Strategies. Both approaches are claiming justification on sustainability grounds. 1.8 Whilst our client accepts that the principle settlement of Market Harborough should retain the lions share of the new housing allocation for the administrative area, our client also sees it as important that some development associated with the rural settlements is not overlooked in order to ensure the villages continue to thrive and become more sustainable settlements and reduce the need to travel and support the Council’s overall sustainability objective. 1.9 In addition, paragraph 4.46 of Planning Policy Statement 12: Local Spatial Planning makes it clear that Core Strategies need to be flexible and contain contingencies to deal with changes in circumstances. It goes on to state that Local Planning Authorities should not rely on a review of the plan to deal with this. My client would suggest that the Plan does not do this and is therefore in danger of being found unsound. 1.10 Our view is that we support urban regeneration and the benefits which well - planned towns can provide in terms of employment, entertainment, culture and services etc but that rural communities have much to	

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3665/168	Mr & Mrs Crane	<p>offer to for example potential for good community life and attractive environment. Moreover, we can test the notion that urban areas are more sustainable than rural. On the contrary, research indicates that many urban locations do not score well on many sustainability counts for example commuting from edge of town estates and that both rural and urban communities need to address the question of how they can become more sustainable rather than writing off many villages.</p> <hr/> <p>We support the strategy to ensure that the needs of the community are met through sustainable growth and suitable access to services. Although we agree that the rural character of the District is maintained, this should not be to the detriment of growth and ongoing vitality, particularly in relation to rural settlements. Living Working Countryside: The Taylor Review of Rural and Affordable Housing found that Local Authorities have for many years interpreted the concept of sustainability as locating new development only in locations where a good infrastructure already exists. The report is critical of this restrictive planning system stating that it leads to a ‘sustainability trap’ that curtails economic development and that change is vital to revive rural communities. It found that wages in rural economies are relatively low with house prices relatively high meaning that people working within rural communities are unable to afford to live there, and so may be forced to live elsewhere. This potentially causes labour shortages and undermines the social, economic and environmental sustainability of rural communities. This can lead to villages being written off as ‘unsustainable’ due to their low service provision, however, Taylor found that if villages are allowed to grow it will create demand for services. Development itself can facilitate service provision by way of agreements to deliver the much needed infrastructure, services and facilities. This document agrees that “achieving a critical mass in developments allows the provision of sustainable services, facilities and renewable energy generation”. We support the development of 7,000 dwellings across the District over the plan period, as set out in part a) of this policy. This is the figure as set out in the East Mids Plan and best meets the housing and accommodation needs of the current and future population of the District. Although the Localism Bill seeks to abolish the Regional Strategies, it gives no guidance as to what Local Authorities should then base their housing numbers on. The housing numbers contained in the East Mids Plan were subject to full Examination in Public so can therefore be considered sound. We support the intention at part f) to develop Broughton Astley as a “Key Centre”. The development of services in Broughton Astley has not kept pace with population growth therefore it is essential that further development is encouraged to redress this imbalance. Broughton Astley is a sustainable location for development. It already benefits from schools, a college, doctors, post offices, a church, petrol station and a bus service but further development could help to deliver additional services. For example, a key infrastructure issue in the District is the small capacity of existing schools to take an increased number of pupils. A site exists in Broughton Astley adjacent to the Hallbrook Primary School. A new development at this location would not only make the usual contribution to school places but the site owner is also willing to donate additional land to the school to enable expansion of the school site. We support the use of a sequential approach to the location of new development. However, whilst it is desirable to prioritise previously developed land, and it is in line with national policy (PPS3) to do so, we welcome the recognition that a sequential approach must be used. In some circumstances and locations, for example, Broughton Astley, very few or no ‘brownfield’ sites are available therefore this approach would take account of this and allocate the next most suitable sites for development. This is acknowledged at paragraph 5.21 of this document. The lack of availability of brownfield land has been further exacerbated by removal of domestic gardens from the definition of Previously Developed Land in PPS3. We welcome the intention at part k) to identify existing important employment sites and to safeguard their function.</p>	

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2033/173	Leicester City Council	<p>The City Council supports the strategy for development at Scraptoft and Thurnby that does not undermine regeneration objectives for the City. It also welcomes Harborough DC's support for Green Wedge designations that provide access to strategic green space and recreational opportunities around the urban area.</p> <p>However the term 'Leicester urban fringe' is not in conformity with the RSS which identifies the 'Leicester Principal Urban Area'. Nor does it take account of the adopted Core Strategies for Leicester City Council and Oadby and Wigston Borough Council which identify the Leicester Principal Urban Area Following the High Court challenge to the revocation of the RSS, the East Midlands Regional Plan still forms part of the Development Plan. Although the City Council accepts that the RSS may have been abolished by the time this Core Strategy is adopted, the term 'Leicester Principal Urban Area' is used in the adopted Core Strategies of Leicester CC, Oadby& Wigston BC and Hinckley& Bosworth BC.</p> <p>Therefore this Core Strategy is not effective because, in this respect, it does not have coherence with the strategies of neighbouring authorities. By introducing additional terminology the policies may prove more difficult to implement.</p>	<p>Replace the term "Leicester urban fringe" with 'Leicester Principal Urban Area'</p>
2034/175	De Montfort University	<p>RPS fully support sub-section a) of the Policy which proposes the development of 7,000 dwellings across the District during the period 2006 - 2026. This level of housing for the District was set by the RSS as a result of a robust evidence base. The RSS remains part of the development plan pending the enactment of the expected Decentralisation and Localism Bill. Even after the Secretary of State had temporarily revoked the RSS in July 2010 Harborough District Council had agreed to continue with the 7,000 dwelling target for its District. With regards to sub-section c), RPS would question 1,000 of the total 1,200 dwellings proposed for Market Harborough being delivered solely by the strategic development area. Focusing a significant proportion of the District's requirement at one strategic site would not provide the opportunity to deliver a wide choice of housing in order to meet the needs of the whole community in terms of tenure and price ranges (including affordable housing). Given the level of new infrastructure required to service such a large site delivery will be delayed which will result in a significant proportion of the new dwellings not being provided until the later years of the plan period.</p>	<p>RPS would wish to see sub-section b) reworded as the significant role of the Leicester PUA/urban fringe established by the RSS has been omitted. We would recommend it be reworded to incorporate the underlined section: "b) Develop Market Harborough's role as the main focus for additional development within the District, outside of the Leicester urban fringe, promoting its historic function as a market town and safeguarding its compact and attractive character;" RPS strongly object to sub-section d) which does not reflect the underlying strategy of the RSS for development to be concentrated in or adjoining the Leicester PUA (RSS Policy 3). The evidence base for the RSS is robust having been tested during the Examination. Harborough District Council has not provided sufficient evidence to justify its proposal within the CS Publication Version to reduce the role and significance of the PUA for development. RPS consider this sub-section should be placed higher in the order and reworded as follows: "Bring forward significant development within and adjacent to the Leicester urban fringe where it supports the regeneration and development objectives in neighbouring Leicester City and Oadby and Wigston Borough; is appropriate in scale and type to existing communities; and safeguards the identity of the communities of Scraptoft and Thurnby/Bushby. "RPS supports sub-sections e) and h) which propose to maintain the Green Wedges and Areas of Separation designations. RPS would suggest that specific policies are drafted in the Core Strategy for each type of designation to enable future development proposals within either the Green Wedges or the Areas of Separation to be fully assessed against appropriate criteria.</p>
2036/181	William Davis Limited & Hallam Land Management Limited	<p>We support the general strategy for growth in the district, which is aimed at securing a level of development that is responsive to the projected increase in population. This will be essential to secure investment in community infrastructure and the provision of a choice of affordable housing, addressing some of the biggest issues in the district.</p> <p>We support the proposal that Market Harborough is the main focus for additional development in the district. The town is a strong location for housing to be built that is attractive to the market; where people want to live. The compact nature of the town means that growth will support the existing core of shops and services and it will be possible to plan new development such that it</p>	

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		<p>promotes sustainable travel. It is appropriate that the overall spatial strategy includes specific reference to a Strategic Development Area at Market Harborough of 1,000 dwellings, since this is central to the achievement of the strategy.</p> <p>We are aware of the comprehensive process that the District Council has gone through to compare options in terms of a range of indicators. In terms of Strategic Housing Land Availability Assessment, which the Council has carried out in liaison with local developers and landowners, this has revealed only a few realistic options to consider for growth of the town. Assessment of the comprehensive evidence base, including assessment of landscape character and sensitivity, ecology, transport, flood risk and open space indicators, has led the Council to direct growth to the north-east of Market Harborough, where land is available and development is deliverable in the most environmentally sensitive way compared to other options.</p> <p>Of land that is available for development, land north west of Market Harborough has the greatest capacity to accept development the level of development required without significant harm to landscape character. It is not at significant risk of flooding (it is in Flood Risk Zone 1) and habitat surveys have revealed ecological constraints that can be mitigated through the development of the site, which would include significant ecological enhancement.</p> <p>There has been significant strategic transport work thus far. Evidence base document 'Assessment of Highways & Transportation Implications', prepared by Ove Arup on behalf of Oadby and Wigston Borough Council and Harborough District Council (May 2009) states that the A6 bypass is a suitable route which could accommodate additional traffic, compared to many other route choices in the town (paragraph 7.1). It also noted (section 11) that Market Harborough town centre highway network is currently constrained and has limited capacity to absorb further traffic growth. Our own Transport Assessment work for the Airfield Farm site, north west of Market Harborough has found that north and eastbound traffic from the site would route via the A6 to avoid congestion, whilst westbound traffic would utilise existing routes, including Fairfield Road and Foxton Road. Only southbound traffic would be expected to route via the town centre. Further modelling work, undertaken as part of the LLITM report (The Leicester & Leicestershire Integrated Transport Model (Preliminary Base Highway Model): An Assessment of Transport Impacts of Alternative Development Scenarios at Market Harborough, August 2010), has considered a number of options for growth of Market Harborough. It found that a development option which limits growth to 1200 dwellings, including a 1,000 dwelling Strategic Development Area, appears to be the option which has least adverse impact on the highway network in Market Harborough (paragraph 6.8).</p> <p>It identified at paragraph 6.9 that mitigation measures for a 1,000 dwelling Strategic Development Area should encourage travel within Market Harborough other than by the car and that these are likely to include improving pedestrian and cycle links with the town centre and schools, ensuring the development is served by bus services to Leicester and ensuring frequent local bus services between the development and the rest of the town. These mitigation measures are all possible and are incorporated into the proposed planning application for the Airfield Farm development.</p> <p>At paragraph 6.10 of the LLITM Report it is stated that locating development to the north west of Market Harborough means that peak hour journeys from the area to Leicester and elsewhere within Leicestershire will not directly impact on the town centre and could benefit from easy access to inter urban bus services to Leicester.</p> <p>In view of all of the above we consider that the proposal for a Strategic Development Area north west of Market Harborough is justified and based on a sound evidence base.</p>	
2038/187	Langtree Group PLC	Langtree are generally supportive of the overall Strategy as set out within Policy 1. Market Harborough should be the focus for development, building on the opportunities for sustainable	Remove conflict between a large greenfield urban extension and priority towards previously developed land

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		<p>development, as set out within National Policy in PPS1 in paragraph 36. Market Harborough is identified as a Principal town within the document and therefore should be a focus for development. However, an internal conflict occurs within Policy 1 whereby part (c) states that 1,000 dwellings will be provided on a greenfield urban extension to the north west of Market Harborough, whilst part (i) gives priority to previously developed land. However, it is unclear whether part (i) is a priority following the greenfield urban extension. This element needs to be reviewed and clarified, as currently drafted this policy is considered unsound. Langtree supports Policy 1, which establishes that priority should be given to development on Previously Developed Land. National Policy within PPS1 and 3 confirm that previously developed land should be the priority for development, in order to assist in delivery of the Government's Sustainable Development aspirations. PPS 3 Paragraph 36 refers to the identification of suitable locations for housing development being locations in areas which offer a range of community facilities and with good access to jobs, key services and infrastructure. The guidance also states that priority for development should be previously developed land, in particular vacant and derelict sites and buildings.</p>	
2039/193	Mr & Mrs Woodcock	<p>Part a) of Policy 1 proposes a total housing requirement for Harborough District of 7,000 dwellings between 2006 and 2026. This mirrors the requirement set out in the East Midlands Regional Plan (which was reinstated in November 2010 following the Cala Homes High Court judgement). Following the publication of the draft Localism Bill, which proposes the abolition of Regional Strategies, there is some uncertainty over the future status of the Regional Plan.</p> <p>The Government has stated its view that, in the absence of Regional Strategies, local authorities may rely upon the housing evidence prepared for Regional Strategies and the totals submitted to the Examination in Public as a basis for their 'locally derived figures'. This is the approach that Harborough has taken. In this context the status of the Regional Strategy is not critically important to the District's overall housing requirement. However, it is considered that the Core Strategy is a departure from national policy and is therefore unsound. This is because the planned time horizon for the document will be less than 15 years from the date of adoption to the end of the monitoring year 2026, which is inconsistent with paragraph 4.13 of PPS12.</p> <p>Paragraph 1.8 and Table 1 of the document sets out that it is expected that the expected adoption date is late 2011. In terms of housing delivery this is well into the monitoring year 2011/2012. A 15 year time horizon would take the Core Strategy into at least 2027. The Core Strategy is also inconsistent with paragraph 53 of PPS 3, which states that "local planning authorities should set out in their Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption." Given that the proposed Core Strategy does not actually allocate any specific sites to deliver housing, the time horizon of the Core Strategy should take account of the time required to prepare and adopt subsequent documents that will perform this role. In the context of the Harborough Local Development Scheme, the relevant document is the Allocations Development Plan Document and accompanying proposals map, together with a Community Infrastructure Levy Charging Schedule. A horizon of 2026 clearly does not allow sufficient time for the preparation and adoption of these documents.</p>	<p>Time Horizon The Core Strategy should work to a time horizon beyond 2026. It is logical, in the absence of a review of a Regional Strategy, to work to a period which reflects the most recent household population projections. A time horizon of 2028 reflects a twenty year period from the base year of the most recently published national household projections (2008), and gives the Council until April 2013 to adopt the necessary Development Plan Documents to allow a continuous supply of housing for a 15 year period in accordance with PPS3. Indeed, this timescale accords with the Council's most recent draft Local Development Scheme (reported to Executive Committee December 20th 2010). The additional 2 year period and the associated additional housing requirements are not considered to be so significant to require substantial review of the Core Strategy preparation and would entail a scale of additional development which would not be so significant to require fresh assessment of its impacts.</p> <p>Housing Requirement To achieve soundness, the housing requirement of the plan set out at Policy 1 (a) needs to be revised to take account of a time horizon to 2028. On the basis of the Council's adopted position at July 2010, this would require a further 700 dwellings across the plan period 2006-2028: Housing Requirement 7,700 2006-2028 Completions 2006-2010 1,841 Residual Requirement to 5,859 2028</p>
3628/199	Dr K Feltham	<p>Evidence has not been produced to demonstrate that housing levels in excess of the 350, which are proposed for the Leicester Urban Fringe, will not significantly alter the traffic and travel conditions, and further exacerbate congestion on the A47.</p>	<p>The Core Strategy needs to be underpinned by a thoroughly developed transportation evidence base in respect of the Leicester Urban Fringe. In the absence of such evidence, the District Council should not consider reviewing the balances of housing provision between the locations included</p>

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			in Policies 1 c), 1 f) and 1 g).
3628/200	Dr K Feltham	The policy is basically sound, although aspect of Policy 1 d) is covered in another form	
3628/201	Dr K Feltham	Despite new developments in Great Glen (Chestnut Avenue), no mention is made of separation protection between Great Glen and Oadby	Amend text to add separation between Great Glen and Oadby.
3590/208	Claybrooke Magna Parish Council	There are 2433 homes yet to be started due to a collapse in demand, so why is the target of 7000 retained? Put another way where is the demand coming from for all these additional homes?	The target number of homes required should be adjusted downwards.
2064/574	Persimmon Homes North Midlands	<p>Reference within Policy (i) to a sequential approach is unsound as it is not in accordance with national or regional policy and is not effective.</p> <p>PPS3, in providing guidance on suitable locations for housing development (paras 36 and 40), prioritises the reuse of previously developed land and buildings. However this priority is only one of a number of criteria in relation to site suitability. This guidance, when published in 2006, replaced the earlier version of PPG3 which did incorporate a 'sequential approach'. There are key differences in the application of these two different sets of guidance. Whilst national policy does not explicitly discourage a sequential approach, the emphasis of PPS3 is on the timely delivery of suitable housing in the right locations.</p> <p>In this context there is no indication with the publication Core Strategy of how this sequential approach will be applied. There is no phasing policy set out in the document. Furthermore, any phasing policy would not be effective in delivering housing, as testified by reference within paragraph 5.21 of the document to only 35% of new development being likely to take place on previously developed land during the plan period. These sites include those identified as 'potentially developable' where there is no indication of whether there is a developer with an interest in the site or a landowner willing to sell. Any policy which sought to hold back the release of greenfield sites and initially rely solely on previously developed sites would place at risk the delivery of the housing requirement in the plan period.</p> <p>In this context it is considered that a sequential approach to previously developed land is neither justified, effective or in accordance with national planning policy. Indeed, there is no need for Policy 1(i) to go any further than merely prioritising the re-use of previously developed land.</p>	To achieve legal compliance and soundness it is considered that the second sentence of Policy 1(i) should be removed.
3640/223	CASCET - Campaign Against the Stoughton Co-op Expansion Threat	The Spatial Strategy is supported especially the balance of proposed developments outlined in Policy 1 c), d), f) and g).	
2040/228	Westleigh Developments Ltd	<p>The identification of Broughton Astley as a Key Centre in Policy 1 and in paragraph 4.4, sequentially equal to Lutterworth, is supported as is the need for additional employment, retail, leisure and community facilities to support the village and its catchment area.</p> <p>The maintenance of a limited separation area between Broughton Astley and Sutton-in-the-Elms and giving priority to previously developed land such as the Coventry Road site is also supported.</p> <p>However, the indication that new employment land should be allocated simply to ensure any losses in the overall stock of employment land are replaced would appear to contradict the previously stated desire that additional employment facilities are provided. The development of</p>	<p>Alter the text in criterion j) of Policy 1 such that it deletes reference to allocating new employment land to address losses in the overall stock.</p> <p>Alter the text in criterion h to refer to the maintenance of a limited separation area between Broughton Astley and Sutton-in-the-Elms.</p>

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		the Coventry Road site for a mixed use development including employment (together with retail, leisure facilities and community uses) offers an excellent opportunity to address the aim set out in criterion f of policy 1 that Broughton Astley is developed as a Key Centre.	
2041/234	Barratt Strategic	The designation of Broughton Astley as a Key Centre, equal in settlement hierarchy terms to Lutterworth, is supported. The provision of new employment, retail, leisure and commercial developments is important to the continued social and economic well-being of the village. The requirement for new residential developments to provide for varied housing needs is also supported. It is intended that the Frolesworth Road residential development which Barratt Strategic are promoting would do this, with up to 30% affordable housing providing a range of housing tenures including rented units available through a housing association and shared ownership dwellings. Within the open market houses, a range of dwellings types and sizes would be provided. Please see the accompanying promotional document for the development of land at Frolesworth Road.	
2042/238	Western Range	<p>Criterion g) of Policy 1 advises that the communities of Kibworth, Fleckney, Great Glen, Billesdon, Ullesthorpe and Husbands Bosworth should be developed as Rural Centres and that these should be the focus for additional housing, employment, retail and community uses to serve their rural catchment area. This aim is supported, particularly in the case of Fleckney, as the village contains all six of the key services set out, together with other facilities such as a pharmacy, employment and places of worship.</p> <p>Criterion l) of Policy 1 advises that developments will provide for varied housing needs (in terms of tenure and affordability). This aim is also supported and it is considered that the development of land at High Street, Fleckney would provide such a mix, including up to 30% affordable housing provision, as detailed in the promotional document, which has been prepared to accompany this representation.</p>	
2044/245	Barratt Strategic	<p>Criterion d) of Policy 1 advises that the Leicester Urban Fringe comprises the settlements of Scraptoft, Thurnby and Bushby and that development within and adjacent to these areas should be appropriate in scale and type to these existing communities and should safeguard their identities and not undermine the development objectives of adjoining authorities. This is contradicted by the definition of the Fringe in Paragraph 5.10 of the Core Strategy, which advises that the Leicester Urban Fringe is considered to be the area to the south and east of the built up area of Leicester. The area to the south of Leicester, adjacent to the edge of Oadby, which includes Springhill Farm on the north east side of the A6 is considered to be within the Leicester Urban Fringe, however, this area is described as being a rural area in the vicinity of the A6 corridor in the text of paragraph 5.10 and accordingly, it appears to have been considered as unsuitable for development. The text of paragraph 5.10 goes on to list the benefits that the area south and east of the built up area of Leicester enjoys but it focuses solely on the areas adjacent to the A47 at Scraptoft, Thurnby and Bushby, advising that these areas are considered suitable and sustainable for development. This is reinforced by the diagram accompanying Policy 15 where the A6/Oadby area is not shown.</p> <p>It is considered that the area to the south of Leicester, adjacent to the edge of Oadby, which includes Springhill Farm on the north east side of the A6 is suitable for development as outlined in the promotional document which has been prepared to accompany this representation.</p>	<p>In the light of the apparent contradiction between Policy 1 and the text contained within paragraph 5.10 it is suggested that the settlements of Oadby and Great Glen are added to the text contained within criterion d) of policy 1. This would more closely reflect the definition of the Principal Urban Area contained within the East Midlands Regional Plan where Oadby is included together with the other three settlements referred to in Policy 1.</p> <p>Alternatively, Policy 1 could be revised to make reference to the Leicester Principal Urban Area, which is a widely used term, as opposed to the Leicester Urban Fringe.</p>
2045/250	David Wilson Homes	Criterion g) of Policy 1 advises that the communities of Kibworth, Fleckney, Great Glen, Billesdon, Ullesthorpe and Husbands Bosworth should be developed as Rural Centres and that	

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		<p>these should be the focus for additional housing, employment, retail and community uses to serve their rural catchment area. This aim is supported, and in the case of Billesdon, the village contains four of the six key services set out in the text, together with other facilities such as a leisure/community centre, fire station and places of worship.</p> <p>Criterion 1) of Policy 1 advises that developments will provide for varied housing needs (in terms of tenure and affordability). This aim is also supported and it is considered that the development of land at Gaulby Road, Billesdon could provide such a mix, including up to 40% affordable housing provision, as detailed in the promotional document, which has been prepared to accompany this representation.</p>	
3602/264	Ms C Renner	We support sustainable development to provide the much needed homes for the area. By locating development adjacent to the urban fringe, the rural integrity of the district can be maintained. In addition, part E of Policy 1 seeks to maintain the Green Wedges. We strongly agree with this, and see the separation of the settlements as important to maintain the distinct neighbourhoods and village separation. This is further supported by Part H of Policy 1, which also seeks to maintain the separation between Thurnby and Bushby, we also support this policy.	
3613/270	Billesdon Parish Council	Paragraph 4.4 - No evidence is produced to justify the limitation of Rural Centres to 6 villages. There are more than 6 villages with the required number of services to be classified as Rural Centres. A selection process has been applied that is not in evidence.	Increase the number of Rural Centres in the list.
3613/271	Billesdon Parish Council	Policy 1(g) - No evidence is produced to justify the limitation of Rural Centres to 6 villages. There are more than 6 villages with the required number of services to be classified as Rural Centres. A selection process has been applied that is not in evidence.	Increase the number of Rural Centres in the list to reflect the selection criteria used.
3617/280	Bovis Homes	The housing provision should be increased to meet the needs of the community.	Either: Enable the development of 12,300 dwellings across the District during the period 2006-2031 Or if the 2006 end date is retained Enable the development of 10,000 dwellings across the District during the period 2006-2026.
3617/281	Bovis Homes	The plan period is too short and should be extended to 2031.	Planning Policy Statement 12: Creating Strong Safe and Prosperous Communities Through Local Spatial Planning (PPS12) refers to the time horizon for a Core Strategy being at least 15 years from the date of adoption (emphasis added). In this case, it is unlikely that the Core Strategy will be adopted until at least late 2011 and, more likely, early 2012. Against the context of national policy in PPS12, the plan period and housing provision ought to extend until 2031. As a consequence of extending the plan period the Core Strategy would be sound.
3617/282	Bovis Homes	The principle of establishing a hierarchy of settlements in the Core Strategy to guide the location of future growth is supported by Bovis Homes. However, the proposed hierarchy should be further refined to differentiate the two different categories of Rural Centre. The introduction of these categories would refine the hierarchy and ensure that the Core Strategy is sound by being based on the evidence available. The Core Strategy refers to three of the Rural Centres possessing six key services and facilities plus at least an hourly bus service. However, the other three Rural Centres do not possess the same level of facilities. Accordingly, it would be appropriate to recognise the different status of these settlements by referring to Kibworth, Fleckney and Great	The suggested change proposed by Bovis Homes to Policy 1(g) would be to: Develop the communities of Kibworth, Fleckney and Great Glen as Key Rural Centres which will be the focus for rural housing, additional employment, retail and community uses to serve the wider rural area. The communities of Billesdon, Ullesthorpe and Husbands Bosworth will be developed as Rural Centres where some growth to meet the needs of their immediate rural catchment will be accommodated.

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		Glen as Key Rural Centres and the remainder just as Rural Centres. The settlement hierarchy does not reflect adequately reflect the evidence base.	
2050/302	William Davis Ltd	<p>William Davis Ltd recognise the national planning commitment to the development of previously developed land as stated in paragraphs 40 through to 44 of PPS3. However we do not support the second section of part (i) of Policy 1 of the Core Strategy, which advocates a sequential approach to the location of new development.</p> <p>Such a sequential approach to development was removed from national planning policy for housing when PPS3 replaced PPG3 in 2006. The removal of the sequential approach was introduced to aid delivery of residential development. Delivery of housing has continued to be a focus of national planning policy, especially with increased emphasis on the need for local authorities to maintain a robust 5 year housing land position. Consequently we consider the sequential approach proposed in Policy 1(i) would go against updated national planning policy, would be inconsistent with PPS3 and would therefore be unsound. We consider it important that the council seeks to maintain a mixed portfolio of development land opportunities available including both PDL and Greenfield land which a sequential approach to residential development would prevent. Having a mixed portfolio would aid housing delivery in the borough and allow the council to maintain a robust five year housing land supply position, as required by PPS3.</p>	<p>As indicated above we consider the sequential approach proposed in part 1(i) of Policy 1 to be inconsistent with national planning policy and should be considered unsound. To make the policy sound we believe that reference to the sequential approach should be deleted. Therefore part (i) of Policy 1 should therefore be reduced to:</p> <p>‘(i) Give priority to the use of previously developed land’</p>
2054/317	Wheatcroft & Son	<p>On behalf of our client, Wheatcroft & Son Ltd, we concur with the broad content of Policy 1 of the Core Strategy. In particular we support the designation of Fleckney as a Rural Centre and the statement that Rural Centres will be a focus for rural housing, additional employment, retail and community uses to serve their rural catchment area. We also support the requirement to allocate new employment land within the Allocations Development Plan document, to ensure that any losses in the overall stock of employment land are suitably replaced.</p> <p>Many of the existing employment allocations in the adopted Local Plan need to be rigorously reassessed as clearly they are not likely to come forward for development and therefore the LDF is the appropriate time to reassess and where appropriate delete them. It is considered that there is some land, for instance, in Market Harborough where the landowner has confirmed that the land is not going to come forward for employment use and in these instances it is suggested that the allocations are deleted. Deliverability is the key to a successful strategy.</p> <p>In formulating new employment allocations or the consideration of the most appropriate locations within the Core Strategy deliverability must be carefully considered. Such that it is likely that locations within the Rural Centres might be more appropriate for small-scale employment provision.</p> <p>However we do not support the designation of Broughton Astley as a Key Centre point (f). Broughton Astley has a similar level of services and facilities as the other Rural Centres, whereas, Lutterworth is considerably larger than any of the Rural Centres and consequently offers more variety of services and facilities. Therefore we consider that only Lutterworth is worthy of its enhanced status within the settlement hierarchy and that there is no justification for designating Broughton Astley as a Key Centre.</p> <p>We are concerned that if Broughton Astley is given the same status as Lutterworth that this would lead to a concentration of development in that settlement instead of spreading growth across the Rural Centres. Focusing growth in only a few settlements would not allow sufficient flexibility, for instance, for local firms to expand as the employment land in the larger settlements is aimed at</p>	<p>Broughton Astley should be re-designated as a Rural Centre in keeping with the level of services and facilities it provides. Lutterworth should be the only Key Centre in the District.</p>

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		<p>national or regional firms but not the smaller local employers who need a ready supply of land to accommodate their requirements. Allowing growth to be evenly distributed will also contribute to the sustainability of all Rural Centres by providing a mix of residential and commercial development that will support each other and support other facilities and services within the Rural Centres.</p>	
2055/324	Leicestershire County Council	<p>No evidence has yet been produced to demonstrate that it is possible to deliver in practice a strategic development area of 1,000 dwellings to the North West of Market Harborough without causing a significant deterioration in travel and environmental conditions in the town. The transport work to date (undertaken by ARUP) has largely been at a broad level, and in the case of Market Harborough based on manual methods. Thus, the transportation impacts on the town of alternative options for housing growth and supporting infrastructure have not yet been considered in any detail. In turn, this has meant that there has been no comprehensive comparison of the merits or otherwise of alternative options, drawing together a broad range of indicators (e.g. environmental, flooding, transportation etc.) to determine whether any one option has clearer overall benefits for the town as a whole.</p> <p>The highway authority has not seen any evidence to suggest that a development of the scale and location proposed will be able to deliver, support and sustain a level of facilities and services that would genuinely encourage travel other than by private car and would minimise the need to travel external to the site.</p> <p>In respect of Policy 13 c), the highway authority is not aware of any evidence at this time to suggest whether the measures identified in this Policy are appropriate and what might be feasible/deliverable in practice, given the location and scale of the proposed strategic development area and the constrained nature of the town centre and its road layout. In addition, the Policy fails to talk about ‘smarter choice’ measures (e.g. personal travel planning, bus information and ticket provision), which in themselves can be costly to implement. The relatively detailed content of Policy 13 c) is at odds with the limited content of the Infrastructure Plan.</p>	The Core Strategy should be underpinned by a more thoroughly developed transportation evidence base in respect of Market Harborough. In the absence of this evidence the District Council should review the balance of housing provision between Market Harborough and the Scraftoft/ Thurnby/ Bushby area.
2055/325	Leicestershire County Council	<p>The agreed joint District Council document “Green Wedge Review Joint Methodology” sets out the following purposes for Green wedges:</p> <ul style="list-style-type: none"> • Preventing the merging of settlements; • Guiding development form; • Providing a green “lung” into urban areas • A recreational resource. <p>There may be a need to extend Green Wedges alongside new development to ensure these purposes continue to apply.</p>	Amend part (e) of Policy 1 to include a reference to extending Green Wedge designations alongside new development.
2055/326	Leicestershire County Council	<p>Para 2.26 refers to Broughton Astley in terms of a lack of employment provision and its reliance on Leicester for services, facilities and employment. Given this, it is questioned why it is afforded the status of ‘Key Centre’ – the same as the town of Lutterworth. If new housing is developed in places that fail to provide a range of supporting employment and other facilities, or which cannot be developed to do so, this will not help to reduce the impacts of travel on people’s lives and the environment. The Policy does not make reference to housing in Lutterworth and Broughton Astley.</p>	Provide evidence of how provision of housing would promote additional services and facilities. Amend part (f) of Policy 1 to include housing.
2055/327	Leicestershire County Council	<p>The Policy omits to refer to Rural Centres providing facilities to serve each settlement.</p>	Amend part (g) of Policy 1 to include a reference to providing facilities to serve each settlement, as in part (f).

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2055/328	Leicestershire County Council	It is not clear how the provision of housing would protect existing services in “smaller settlements”.	Provide evidence of how provision of housing would protect existing services. The definition of “smaller settlements” should also be clarified.
2055/329	Leicestershire County Council	Whilst it is acknowledged that the Glossary provides definitions, terminology is confusing in this paragraph, with various references to Key Centres, Rural Centres, Town Centres, District Centres, and Local Centres. Later in the document, the term “Selected Rural Villages” is also used, but is not referred to here. The first and last parts of this paragraph appear to repeat.	Clarify in this paragraph the difference between the various classifications.
3678/379	Mr N Lane	The general principles of Policy 1: Spatial Strategy for Harborough are supported. Point f) which seeks to develop Broughton Astley as a Key Service Centre to provide additional employment, retail, leisure and community facilities to serve the settlement and surrounding catchment area is welcomed. In seeking to develop Broughton Astley as a Key Service Centre it is considered that sustainable sites which have direct links to the village centre and local services and facilities, such as Glebe Farm, (located to the south west of Broughton Astley, off Frolesworth Road) should be allocated for development in the Allocations DPD.	In seeking to develop Broughton Astley as a Key Service Centre it is considered that sustainable sites which have direct links to the village centre and local services and facilities, such as Glebe Farm, (located to the south west of Broughton Astley, off Frolesworth Road) should be allocated for development in the Allocations DPD.
2056/381	Trustees of the Bowden Settlement	<p>The Trustees of the Bowden Settlement support the general principles of Policy 1: Spatial Strategy for Harborough. In particular, Point b) of Policy 1 which seeks to “Develop Market Harborough’s role as the main focus for additional development within the District, promoting its historic function as a market town and safeguarding its compact and attractive nature” is supported. However, serious concern is raised over Point c) which proposes “a strategic development area immediately to the north west of Market Harborough, including approximately 1000 dwellings to meet the strategic requirement for new dwellings”. Notwithstanding the issues surrounding the unsustainable location of the site, it is considered that the identification of this strategic development is not ‘justified’ and therefore unsound as the Council have failed to undertake a full assessment of alternative locations for growth in Market Harborough.</p> <p>Detailed comments on the soundness of Point c) are set out in the Trustees response to Policy 13: Market Harborough. The Trustees are also concerned with the statement contained in Point h) of Policy 1 which seeks to “Safeguard the individual character of settlements, by maintaining the separation between; ... Great Bowden and Market Harborough....”. More detailed representations on this issue are made in response to Policy 13: Market Harborough. Further concern is raised that Policy 1 does not identify Great Bowden as a settlement where its community can be developed through the provision of new dwellings and retail and employment uses. The close proximity of Great Bowden to the services and facilities on offer in Market Harborough is recognised however, it is considered that a small amount of additional development in Great Bowden should be allowed in order to sustain its own services and facilities in the longer term. The failure to identify any additional growth in Great Bowden challenges the delivery (and therefore soundness) of the overarching principle of Policy 1 “to ensure the needs of the community are met through sustainable growth and suitable access to services”.</p>	
2057/384	AMOS	AMOS support the general principles of Policy 1: Spatial Strategy for Harborough. In particular, Point b) of Policy 1 which seeks to “Develop Market Harborough’s role as the main focus for additional development within the District, promoting its historic function as a market town and safeguarding its compact and attractive nature” is supported. However, serious concern is raised over Point c) which proposes “a strategic development area immediately to the north west of Market Harborough, including approximately 1000 dwellings to meet the strategic requirement for new dwellings”. Notwithstanding the issues surrounding the unsustainable location of the site,	

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		it is considered that the identification of this strategic development is not ‘justified’ and therefore unsound as the Council have failed to undertake an assessment of alternative locations for growth in Market Harborough. Detailed comments on the soundness of Point c) are set out in the AMOS’s response to Policy 13: Market Harborough.	
2058/387	Constable Maxwell	The general principles of Policy 1: Spatial Strategy for Harborough are supported. Point g) which seeks to develop the communities of Kibworth, Fleckney, Great Glen, Billesdon, Ullesthorpe and Husbands Bosworth as Rural Centres as a focus for rural housing, additional employment, retail and community uses to serve their rural catchment areas is welcomed. In seeking to develop Husbands Bosworth, it is considered that suitable and sustainable sites such as land to the east of Husbands Bosworth, off Theddingworth Road (A4304), should be allocated for development in the Allocations DPD.	
2059/390	Mr S Nanuwa	The general principles of Policy 1: Spatial Strategy for Harborough are supported. Point g) which seeks to develop the communities of Kibworth, Fleckney, Great Glen, Billesdon, Ullesthorpe and Husbands Bosworth as Rural Centres as a focus for rural housing, additional employment, retail and community uses to serve their rural catchment areas is welcomed. In seeking to develop Great Glen, it is considered that suitable and sustainable sites such as land to the north of Great Glen, off Stretton Road, should be allocated for development in the Allocations DPD.	
2060/393	Mrs J Eastwood	The general principles of Policy 1: Spatial Strategy for Harborough are supported. Point g) which seeks to develop the communities of Kibworth, Fleckney, Great Glen, Billesdon, Ullesthorpe and Husbands Bosworth as Rural Centres as a focus for rural housing, additional employment, retail and community uses to serve their rural catchment areas is welcomed. In seeking to develop Ullesthorpe, it is considered that suitable and sustainable sites such as land to the south of Ullesthorpe, east of the disused railway and west of South Avenue, should be allocated for development in the Allocations DPD.	
2061/396	Pilkington Trust	The Pilkington Trust support the general principles of Policy 1: Spatial Strategy for Harborough. In particular, Point b) of Policy 1 which seeks to “Develop Market Harborough’s role as the main focus for additional development within the District, promoting its historic function as a market town and safeguarding its compact and attractive nature” is supported. However, serious concern is raised over Point c) which proposes “a strategic development area immediately to the north west of Market Harborough, including approximately 1000 dwellings to meet the strategic requirement for new dwellings”. Notwithstanding the issues surrounding the unsustainable location of the site, it is considered that the identification of this strategic development is not ‘justified’ and therefore unsound as the Council have failed to undertake an assessment of alternative locations for growth in Market Harborough. Detailed comments on the soundness of Point c) are set out in the Trust’s response to Policy 13: Market Harborough.	
3657/412	Jelson	The policy only seeks to deliver precisely 7,000 dwellings across the District up to 2026. Aiming to deliver precisely the amount of housing required and no more is an inflexible approach that seriously threatens the potential to deliver the Core Strategy. This lack of flexibility is a continued theme throughout the document. To provide the necessary flexibility and to ensure delivery the housing target should be expressed as a minimum. Jelson welcomes the general support offered in the Core Strategy for development in the Leicester Urban Fringe. The approach to development in this area appears, however, to be unduly restrictive rather than permissive. This does not accord with the conclusion (at paragraph 5.10 of the CS) that development in this area is suitable and	

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		<p>sustainable. Criteria d) of this policy reflects this approach, seeking in its wording to control rather than promote development in this area.</p> <p>A further theme throughout the document is reference to Green Wedges (e) and Areas of Separation (h). The role and purpose of the two often seems confused, particularly given that one of the stated functions of Green Wedge is to prevent the merging of settlements (see Policy 8). The Core Strategy does not provide any comparable definition of the role and function of Areas of Separation. It is considered that the 'Area of Separation' designation is surplus to requirements and should be deleted unless a clear difference between it and Green Wedge can be demonstrated. In addition, there needs to be an acknowledgement in e) and h) that the extent and boundaries of Green Wedges and I or Areas of Separation will be reviewed in the context of achieving a).</p>	
2064/419	Persimmon Homes North Midlands	<p>It is considered that the Core Strategy is unsound because the planned time horizon for the document will be less than 15 years from the date of adoption to the end of the monitoring year 2026. This fails to conform to national planning policy set out at paragraph 4.13 of PPS12.</p> <p>Paragraph 1.8 and Table 1 of the document sets out that it is expected that the expected adoption date is late 2011. In terms of housing delivery this is well into the monitoring year 2011/2012. A 15 year time horizon would take the Core Strategy into at least 2027.</p> <p>The time horizon has particular significance for the delivery of housing. PPS3 paragraph 53 requires that “local planning authorities should set out in their Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption.” Given that the proposed Core Strategy does not actually allocate any specific sites to deliver housing, the time horizon of the Core Strategy should take account of the time required to prepare and adopt subsequent documents that will perform this role. In the context of the Harborough Local Development Scheme, the relevant document is the Allocations Development Plan Document and accompanying proposals map, together with a Community Infrastructure Levy Charging Schedule. An horizon of 2026 clearly does not allow sufficient time for the preparation and adoption of these documents, and therefore the proposed time horizon set out in Policy 1(a) of the Core Strategy fails the test of soundness on account of its lack of conformity to national planning policy.</p> <p>The housing requirement set out in Policy 1(a) is consistent with the housing requirement set out in the adopted East Midlands RSS. This plans for the period to 2026. As the planning period of the Core Strategy should extend beyond 2026, the housing requirement should also be increased in order to deal flexibly with meeting long terms housing needs in the district. The 2033 household projections are available and should form the basis of a revised housing requirement that reflects the longer time horizon of the Core Strategy. This would ensure that the Core Strategy is justified and effective in terms of deliverability and flexibility.</p>	<p>The Core Strategy should work to a time horizon beyond 2026. A time horizon of 2028 reflects a twenty year period from the base year of the most recently published national household projections (2008), and gives the Council until April 2013 to adopt the necessary Development Plan Documents to allow a continuous supply of housing for a 15 year period in accordance with PPS3. Indeed, this timescale accords with the Council’s most recent draft Local Development Scheme (reported to Executive Committee December 20th 2010).</p> <p>The additional 2 year period and the associated additional housing requirements are not considered to be so significant to require substantial review of the Core Strategy preparation and would entail a scale of additional development which would not be so significant to require fresh assessment of its impacts.</p> <p>To achieve soundness, the housing requirement of the plan set out at Policy 1(a) needs to be revised to take account of a time horizon to 2028. On the basis of the Council’s adopted position at July 2010, this would require a further 700 dwellings across the plan period 2006-2028.</p> <p>In the light of the above the following changes are required:</p> <ul style="list-style-type: none"> •Amend second sentence in paragraph 1.7 to read: “It sets out a long term spatial plan for the District and its communities to 2028 and beyond and explains how change will happen”. •Amend Policy 1(a) to read: “Policy 1: Spatial Strategy for Harborough <p>To maintain the District’s unique rural character whilst ensuring that the needs of the community are met through sustainable growth and suitable access to services, the spatial strategy for Harborough to 2028 is to:</p> <p>a)Enable the development of 7,700 dwellings across the District during the period 2006-2028;</p> <p>These changes also need to be reflected in amendments to paragraphs 1.7, 1.8, 5.5, Table 2, Policy 2, Table 3, Table 4,</p>
2065/424	Trustees of the Bushby Settlement c/o Mather Jamie	It is considered that the Core Strategy is unsound because the planned time horizon for the document will be less than 15 years from the date of adoption to the end of the monitoring year	The Core Strategy should work to a time horizon beyond 2026. A time horizon of 2028 reflects a twenty year period from the base year of the most

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		<p>2026. This fails to conform to national planning policy set out at paragraph 4.13 of PPS12.</p> <p>Paragraph 1.8 and Table 1 of the document sets out that it is expected that the expected adoption date is late 2011. In terms of housing delivery this is well into the monitoring year 2011/2012. A 15 year time horizon would take the Core Strategy into at least 2027.</p> <p>The time horizon has particular significance for the delivery of housing. PPS3 paragraph 53 requires that “local planning authorities should set out in their Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption.” Given that the proposed Core Strategy does not actually allocate any specific sites to deliver housing, the time horizon of the Core Strategy should take account of the time required to prepare and adopt subsequent documents that will perform this role. In the context of the Harborough Local Development Scheme, the relevant document is the Allocations Development Plan Document and accompanying proposals map, together with a Community Infrastructure Levy Charging Schedule. An horizon of 2026 clearly does not allow sufficient time for the preparation and adoption of these documents, and therefore the proposed time horizon set out in Policy 1(a) of the Core Strategy fails the test of soundness on account of its lack of conformity to national planning policy.</p> <p>The housing requirement set out in Policy 1(a) is consistent with the housing requirement set out in the adopted East Midlands RSS. This plans for the period to 2026. As the planning period of the Core Strategy should extend beyond 2026, the housing requirement should also be increased in order to deal flexibly with meeting long terms housing needs in the district. The 2033 household projections are available and should form the basis of a revised housing requirement that reflects the longer time horizon of the Core Strategy. This would ensure that the Core Strategy is justified and effective in terms of deliverability and flexibility.</p>	<p>recently published national household projections (2008), and gives the Council until April 2013 to adopt the necessary Development Plan Documents to allow a continuous supply of housing for a 15 year period in accordance with PPS3. Indeed, this timescale accords with the Council’s most recent draft Local Development Scheme (reported to Executive Committee December 20th 2010).</p> <p>The additional 2 year period and the associated additional housing requirements are not considered to be so significant to require substantial review of the Core Strategy preparation and would entail a scale of additional development which would not be so significant to require fresh assessment of its impacts.</p> <p>To achieve soundness, the housing requirement of the plan set out at Policy 1(a) needs to be revised to take account of a time horizon to 2028. On the basis of the Council’s adopted position at July 2010, this would require a further 700 dwellings across the plan period 2006-2028.</p> <p>In the light of the above the following changes are required:</p> <ul style="list-style-type: none"> •<input type="checkbox"/>Amend second sentence in paragraph 1.7 to read: “It sets out a long term spatial plan for the District and its communities to 2028 and beyond and explains how change will happen”. •<input type="checkbox"/>Amend Policy 1(a) to read: <input type="checkbox"/>“Policy 1: Spatial Strategy for Harborough <p>To maintain the District’s unique rural character whilst ensuring that the needs of the community are met through sustainable growth and suitable access to services, the spatial strategy for Harborough to 2028 is to:</p> <p>a)<input type="checkbox"/>Enable the development of 7,700 dwellings across the District during the period 2006-2028;</p> <p>These changes also need to be reflected in amendments to paragraphs 1.7, 1.8, 5.5, Table 2, Policy 2, Table 3, Table 4,</p>
2066/431	Davidsons Group Ltd	<p>Time Horizon of Core Strategy</p> <p>It is considered that the Core Strategy is not legally compliant and is unsound because the planned time horizon for the document will be less than 15 years from the date of adoption to the end of the monitoring year 2026. This fails to conform to national planning policy set out at paragraph 4.13 of PPS12.</p> <p>Paragraph 1.8 and Table 1 of the document sets out that it is expected that the expected adoption date is late 2011. In terms of housing delivery this is well into the monitoring year 2011/2012. A 15 year time horizon would take the Core Strategy into at least 2027.</p> <p>The time horizon has particular significance for the delivery of housing. PPS3 paragraph 53 requires that “local planning authorities should set out in their Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15</p>	<p>The Core Strategy should work to a time horizon beyond 2026. It is logical, in the absence of a review of a Regional Strategy, to work to a period which reflects the most recent household population projections.</p> <p>A time horizon of 2028 reflects a twenty year period from the base year of the most recently published national household projections (2008), and gives the Council until April 2013 to adopt the necessary Development Plan Documents to allow a continuous supply of housing for a 15 year period in accordance with PPS3. Indeed, this timescale accords with the Council’s most recent draft Local Development Scheme (reported to Executive Committee December 20th 2010).</p> <p>The additional 2 year period and the associated additional housing requirements are not considered to be so significant to require substantial review of the Core Strategy preparation and would entail a scale of</p>

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2067/435	Davidsons Group Ltd	<p>years from the date of adoption.” Given that the proposed Core Strategy does not actually allocate any specific sites to deliver housing, the time horizon of the Core Strategy should take account of the time required to prepare and adopt subsequent documents that will perform this role. In the context of the Harborough Local Development Scheme, the relevant document is the Allocations Development Plan Document and accompanying proposals map, together with a Community Infrastructure Levy Charging Schedule. An horizon of 2026 clearly does not allow sufficient time for the preparation and adoption of these documents, and therefore the proposed time horizon of the Core Strategy also fails the test of soundness on account of its lack of conformity to national planning policy.</p> <p>Part a) of Policy 1 proposes a total housing requirement for Harborough District of 7,000 dwellings between 2006 and 2026. This mirrors the requirement set out in the East Midlands Regional Plan (which was reinstated in November 2010 following the Cala Homes High Court judgement). Following the publication of the draft Localism Bill, which proposes the abolition of Regional Strategies, there is some uncertainty over the future status of the Regional Plan. The Government has stated its view that, in the absence of Regional Strategies, local authorities may rely upon the housing evidence prepared for Regional Strategies and the totals submitted to the Examination in Public as a basis for their ‘locally derived figures’. This is the approach that Harborough has taken. In this context, the status of the Regional Strategy is not critically important to the District’s overall housing requirement. However, it is considered that the Core Strategy is a departure from national policy and is therefore unsound. This is because the planned time horizon for the document will be less than 15 years from the date of adoption to the end of the monitoring year 2026, which is inconsistent with paragraph 4.13 of PPS12.</p> <p>Paragraph 1.8 and Table 1 of the document sets out that it is expected that the expected adoption date is late 2011. In terms of housing delivery this is well into the monitoring year 2011/2012. A 15 year time horizon would take the Core Strategy into at least 2027. The Core Strategy is also inconsistent with paragraph 53 of PPS 3, which states that “local planning authorities should set out in their Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption.” Given that the proposed Core Strategy does not actually allocate any specific sites to deliver housing, the time horizon of the Core Strategy should take account of the time required to prepare and adopt subsequent documents that will perform this role. In the context of the Harborough Local Development Scheme, the relevant document is the Allocations Development Plan Document and accompanying proposals map, together with a Community Infrastructure Levy Charging Schedule. A horizon of 2026 clearly does not allow sufficient time for the preparation and adoption of these documents.</p>	<p>additional development which would not be so significant to require fresh assessment of its impacts.</p> <p>The Core Strategy should work to a time horizon beyond 2026. It is logical, in the absence of a review of a Regional Strategy, to work to a period which reflects the most recent household population projections. A time horizon of 2028 reflects a twenty year period from the base year of the most recently published national household projections (2008), and gives the Council until April 2013 to adopt the necessary Development Plan Documents to allow a continuous supply of housing for a 15 year period in accordance with PPS3. Indeed, this timescale accords with the Council’s most recent draft Local Development Scheme (reported to Executive Committee December 20th 2010). The additional 2 year period and the associated additional housing requirements are not considered to be so significant to require substantial review of the Core Strategy preparation and would entail a scale of additional development which would not be so significant to require fresh assessment of its impacts.</p> <p>To achieve soundness, the housing requirement of the plan set out at Policy 1(a) needs to be revised to take account of a time horizon to 2028. On the basis of the Council’s adopted position at July 2010, this would require a further 700 dwellings across the plan period 2006-2028:</p> <p>Nos Housing Requirement 2006-2028 7,700 Completions 2006-2010 1,841 Residual Requirement to 2028 5,859</p>
2029/441	Davidsons Group	<p>Policy 1(e) Green Wedges are an established feature in Leicestershire and there are no objections to their continued support within the Core Strategy. However, an important principle is established in Policy 8 of the Core Strategy which sets out that a detailed review of Green Wedge boundaries will take place. This principle should also form part of the overall Spatial Strategy set out in Policy 1 to ensure that the Core Strategy is justified and sufficiently flexible to meets the tests of effectiveness.</p>	<p>Policy 1(e) To ensure that the spatial strategy reflects the most appropriate strategy against the reasonable alternatives and is sufficiently flexible policy 1(e) should be reworded to reflect the principle included elsewhere in the document that Green Wedges will be reviewed. The following changes to Policy 1(h) should be made:</p> <p>e) Support the principle of Green Wedge designations whilst reviewing their boundaries as part of the allocation of new development, in order to prevent etc.....</p>

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2029/443	Davidsons Group	<p>Policy 1(h) This proposed requirement fails the test of soundness as it is not justified or effective having regard to the evidence base. Whilst the overall principles of this element of the policy in relation to protecting individual settlement identity and separation are reasonable, the policy is imprecise in that the location of separation areas is not defined. In addition, the policy does not recognise that the Council's own landscape character assessment work (Harborough District Landscape Character Assessment) identifies capacity for development in several locations, including areas between Scraptoft and Thurnby. This part of the policy as it stands is therefore unsound and should be changed to ensure that it is justified and sufficiently flexible to meet the tests of effectiveness.</p>	<p>Policy 1(h) To ensure that the spatial strategy is clear and sufficiently flexible policy 1(h) should be reworded to reflect the principle included in the evidence base that separation between settlements will be reviewed alongside new development. The following changes to Policy 1(h) should be made:</p> <p>h) Safeguard the individual character of settlements, by supporting the principle of separation between; Scraptoft and Thurnby[.....]Sutton in the Elms and Broughton Astley except where required as part of the allocation of new development.</p>
2069/445	East Midlands Councils	<p>EMC's response is based solely on the East Midlands Regional Plan (March 2009), and does not address any of the other tests of 'soundness' set out in PPS12. As you will be aware the High Court recently confirmed that the Regional Plan will remain part of the statutory development plan until it is abolished by primary legislation.</p> <p>In assessing the conformity of the Harborough Core Strategy against the Regional Plan, it is noted that:</p> <ul style="list-style-type: none"> • The overall level of housing provision proposed is consistent with Policy 13a of the Regional Plan; • The proposed policies on affordable housing and provision for gypsies and travellers are consistent with the approaches set out in Policies 14 and 15 of the Regional Plan respectively; • The proposed approach to employment land provision is consistent with Policy 20 of the Regional Plan; • The approaches to environmental and green infrastructure, climate change, flood risk and transport all appear to be generally consistent with the relevant policies of the Regional Plan; <p>In terms of housing distribution, the priority given to Market Harborough would seem to be consistent with the spatial approach set out in the 3 Cities SubRegional Strategy, which comprises Section 4 of the Regional Plan.</p> <p>Although the level of housing provision associated with the Leicester urban fringe proposed is slightly lower than anticipated in Policy Three Cities SRS 3 of the Regional Plan (768 compared to 800), it is understood that that this results from the outcome local evidence and community consultation carried out since the Regional Plan was finalised. In conclusion, the Core Strategy taken as whole would appear to be in 'general conformity' with the Regional Plan.</p>	
2029/444	Davidsons Group	<p>Policy 1(i) Reference within this part of the policy to a sequential approach is unsound as it is not in accordance with national or regional policy and is not effective.</p> <p>PPS3, in providing guidance on suitable locations for housing development (paras 36 and 40), prioritises the reuse of previously developed land and buildings. However this priority is only one of a number of criteria in relation to site suitability. This guidance, when published in 2006, replaced the earlier version of PPG3 which did incorporate a 'sequential approach'. There are key differences in the application of these two different sets of guidance. Whilst national policy does not explicitly discourage a sequential approach, the emphasis of PPS3 is on the timely delivery of suitable housing in the right locations.</p> <p>In this context there is no indication with the publication Core Strategy of how this sequential approach will be applied. There is no phasing policy set out in the document. Furthermore, any</p>	<p>Policy 1(i) To achieve legal compliance and soundness it is considered that the second sentence of Policy 1(i) should be removed.</p>

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		<p>phasing policy would not be effective in delivering housing, as testified by reference within paragraph 5.21 of the document to only 35% of new development being likely to take place on previously developed land during the plan period. These sites include those identified as 'potentially developable' where there is no indication of whether there is a developer with an interest in the site or a landowner willing to sell. Any policy which sought to hold back the release of greenfield sites and initially rely solely on previously developed sites would place at risk the delivery of the housing requirement in the plan period.</p> <p>In this context it is considered that a sequential approach to previously developed land is neither justified, effective or in accordance with national planning policy. Indeed, there is no need for Policy 1(i) to go any further than merely prioritising the re-use of previously developed land.</p>	
2073/448	Leicester Diocesan Board of Finance/Carr/Bowie/Murmann/Joh	<p>The Spatial Portrait and Key Issues present a reasonable profile of the District but somewhat oversimplifies the settlement pattern and respective social and economic roles of settlements and links. Market Harborough and Lutterworth are longstanding established market towns each astride key transport routes through and within the District - the A6 and M1 respectively linked strategically beyond to the south by the A 14/MS. Social and economic movement within and beyond the District supports the importance of these assets. And relatively new road infrastructure along the A6 provides an opportunity to accommodate new homes and jobs in locations where people want to live and where facilities both exist and can be added and improved upon.</p> <p>The traditional 'Key settlements' of Great Glen, Kibworth, and Fleckney serve the rural hinterland of the A6 corridor between Leicester/ Oadby and Wigston, and Market Harborough. This corridor houses some 40% of the District's population and has a robust range of employment, commerce, and community facilities with good transport links. Similarly Lutterworth and Broughton Astley perform a parallel role in the western part of the District, with 22% of the population living in the two settlements. Great Glen, Kibworth and Fleckney, and Broughton Astley, all perform a similar sort of role being larger settlements serving a wider rural hinterland. It is this historically developed, planned function which sets these settlements apart from all of the other villages in the District. Their function is an important social, economic, and physical asset which needs to be sustained.</p> <p>Great Glen in particular is locationally well placed in relation to the Leicester/Oadby Wigston area, economically, physically, and socially. It has excellent road links for car and bus; is the closest and most accessible settlement to the Leicester urban area in this corridor; has the added social and economic attractor and facility of the newly built Leicester Grammar School; has a good range of village services and facilities which could be sustained and improved by additional new homes and jobs; and has land available between the A6 bypass and the village which could provide for a balanced community of new homes across the whole spectrum of need; new employment provision; and contributions to improve existing, and attract new, village facilities.</p> <p>Billesdon, Ullesthorpe and Husbands Bosworth are smaller settlements with a more restricted function, and should not be in the same category as the aforementioned four larger settlements. Indeed, there are other villages which might be considered as 'Rural Centres' for the purpose of achieving improved services and facilities, and sustaining services in the more rural parts of the District. This strategy needs re-examining, to ensure that the key issues are capable of being addressed effectively.</p>	Policy 1 Spatial Strategy for Harborough should be amended to reflect the key social and economic corridors identified above and recognise the value of key infrastructure assets which will help to achieve the strategic objectives.

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2074/457	Mrs P Hays	<p>Policy 1a) states that the Spatial Strategy to 2026 will enable the development of 7,000 dwellings across the District during the period 2006-2026. We consider that this policy is unsound because it is not justified, not effective, and no longer consistent with national policy. Our reasons are as follows:</p> <ul style="list-style-type: none"> • At para 2.8 (of the CS) it states that the population increased by 8.1 % between 2001 and 2008 and is set to continue to rise by 19% by 2016. 7,000 dwellings equates to an increase of around 20% in the total dwelling stock of Harborough District. Given that the plan period extends to 2026, then if a similar rate of population growth is achieved between 2016 and 2026 then the population can be expected to increase by around 30% in the period 2001-2026, say 25% between 2006 and 2026. Thus the provision of 7,000 will be insufficient to meet the growth in population; • At the same time the size of households is decreasing. This is confirmed in the 2008 based household projections published by the DCLG on 26 November 2010. These showed the number of households increasing by 27% in England (29% in the East Midlands) over the period 2008-33, of which 75% of this increase will be due to population growth and 25% to decreases in household size. Thus, the number of houses to be built in Harborough will need to reflect not only population growth but also decreases in household size; • At the same time the government has announced that Regional Spatial Strategies, which set down housing provision targets to be used in Core Strategies, are to be abolished. Thus, housing requirements will have to be determined at the District level having regard to the evidence base, which takes into account population increases and changes in household size, the two main determinants of estimating future housing requirements. 	<p>In order to make the CS sound we therefore propose that the housing requirement set down in Policy 1 a) should accurately reflect the evidence base, particularly having regard to population growth and decreases in household size. We propose that the Spatial Strategy should enable the development of between 8,000 and 9,000 houses between 2006 and 2026. This revised figure will need to be reflected in other policies of the CS.</p>
2077/466	Mr D Mason	<p>The proposed Spatial Strategy for Harborough is very appealing, in particular the planned development at Market Harborough Airfield site. This development will allow co-location of a 1000 dwellings and necessary supporting infrastructure; rather than a scattered piecemeal approach stretch of existing facilities. It will also not be subject to flooding. The intentions for Lutterworth and Broughton Astley and other large centres of population build upon their historic infrastructure legacy, good communications, proximity to employment etc so enabling necessary development at lowest cost. Fulfilment of the intension will prepare these communities for what must be a dynamic future.</p>	
2081/495	Bitteswell Parish Council	<p>The endeavour to classify settlements on the basis of the 'services' available to them as a proxy for sustainability is simplistic and suspect. The needs of any community are not uniform, but will depend on age, health, mobility, wealth and other factors. The inclusion of 'public house' in the proposed 'six key services' is wholly incongruous and trespasses into the realm of the ludicrous. A public house may rank as a community asset, but it does not afford a service. If the District Council wishes to persist with a hierarchical classification of settlements for its own purposes it is recommended that alternative criteria, which may have the benefit of being credible, are explored.</p>	
2065/540	Trustees of the Bushby Settlement c/o Mather Jamie	<p>Green Wedges are an established feature in Leicestershire and there are no objections to their continued support within the Core Strategy. However, an important principle is established in Policy 8 of the Core Strategy which sets out that a detailed review of Green Wedge boundaries will take place. This principle should also form part of the overall Spatial Strategy set out in Policy 1 to ensure that the Core Strategy is justified and sufficiently flexible to meets the tests of effectiveness.</p>	<p>To ensure that the spatial strategy reflects the most appropriate strategy against the reasonable alternatives and is sufficiently flexible policy 1(e) should be reworded to reflect the principle included elsewhere in the document that Green Wedges will be reviewed. The following changes to Policy 1(h) should be made:</p> <p>e) Support the principle of Green Wedge designations whilst reviewing their boundaries as part of the allocation of new development, in order to prevent etc.....</p>

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2065/541	Trustees of the Bushby Settlement c/o Mather Jamie	<p>Reference within this part of the policy to a sequential approach is unsound as it is not in accordance with national or regional policy and is not effective.</p> <p>PPS3, in providing guidance on suitable locations for housing development (paras 36 and 40), prioritises the reuse of previously developed land and buildings. However this priority is only one of a number of criteria in relation to site suitability. This guidance, when published in 2006, replaced the earlier version of PPG3 which did incorporate a 'sequential approach'. There are key differences in the application of these two different sets of guidance. Whilst national policy does not explicitly discourage a sequential approach, the emphasis of PPS3 is on the timely delivery of suitable housing in the right locations.</p> <p>In this context there is no indication with the publication Core Strategy of how this sequential approach will be applied. There is no phasing policy set out in the document. Furthermore, any phasing policy would not be effective in delivering housing, as testified by reference within paragraph 5.21 of the document to only 35% of new development being likely to take place on previously developed land during the plan period. These sites include those identified as 'potentially developable' where there is no indication of whether there is a developer with an interest in the site or a landowner willing to sell. Any policy which sought to hold back the release of greenfield sites and initially rely solely on previously developed sites would place at risk the delivery of the housing requirement in the plan period.</p> <p>In this context it is considered that a sequential approach to previously developed land is neither justified, effective or in accordance with national planning policy. Indeed, there is no need for Policy 1(i) to go any further than merely prioritising the re-use of previously developed land.</p>	To achieve legal compliance and soundness it is considered that the second sentence of Policy 1(i) should be removed.
2066/550	Davidsons Group	<p>The Total Housing Requirement of the Core Strategy (Policy 1(a))</p> <p>With reference to the paragraphs above, the Core Strategy fails to plan for a continuous supply of housing land for a period of 15 years from the date of adoption of the Allocations Development Plan Document. It is therefore considered that Policy 1(a) is unsound as it does not accord with the policy requirements of national policy document PPS3 paragraph 53.</p>	To achieve soundness, the housing requirement of the plan set out at Policy 1(a) needs to be revised to take account of a time horizon to 2028. On the basis of the Council's adopted position at July 2010, this would require a further 700 dwellings across the plan period 2006-2028.
2066/551	Davidsons Group	<p>This proposed requirement fails the test of soundness as it is not justified having regard to the available evidence base. Whilst the overall principles of this objective, in relation to protecting individual settlement identity and separation are reasonable, the wording of the proposed policy, as it would apply to the area between Market Harborough and Lubenham is unnecessarily restrictive as it implies that the existing separation between the two settlements is necessary to be maintained in order to protect the separate identities of the individual settlements.</p> <p>Indeed, the Council's own landscape character assessment work (Market Harborough Landscape Character Assessment and Landscape Capacity Study) identifies medium capacity for change in most identified parcels to the west of Market Harborough. This promoter's own landscape evidence concludes in relation to existing built form that "the natural screening of...parcel 35 by local landform creates an area that could be sympathetically developed with little impact on the perceived edge of settlement when viewed from the wider countryside. The land continues west across parcels 36, 37 and 38, and although development in this location would be remote from existing built form it would be screened from properties in Lubenham by intervening landform."</p> <p>What is clear from available evidence is that the landform in this location is undulating, and that whilst some areas should be kept free from development in order to prevent coalescence, other</p>	

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		<p>parts of this area could be developed without affecting visual separation.</p> <p>This part of the policy is therefore unsound as it is not justified.</p>	
2066/552	Davidsons Group	<p>Reference within this part of the policy to a sequential approach is unsound as it is not in accordance with national or regional policy and is not effective.</p> <p>PPS3, in providing guidance on suitable locations for housing development (paras 36 and 40), prioritises the reuse of previously developed land and buildings. However this priority is only one of a number of criteria in relation to site suitability. This guidance, when published in 2006, replaced the old PPG3 which included a more arbitrary 'sequential approach'. There are key differences in the application of these two different sets of guidance. Whilst national policy does not explicitly discourage a sequential approach, the emphasis of PPS3 is on the timely delivery of suitable housing in the right locations.</p> <p>In this context there is no indication with the publication Core Strategy of how this sequential approach will be applied. There is no phasing policy set out in the document. Furthermore, any phasing policy would not be effective in delivering housing, as testified to by reference within paragraph 5.21 of the document to only 35% of new development being likely to take place on previously developed land. Indeed, paragraphs 5.20-5.21 reference sites identified within the SHLAA process. These sites include those identified as 'potentially developable' where there is no indication of whether there is a developer with an interest in the site or a landowner willing to sell. Any policy which sought to hold back the release of greenfield sites and initially rely solely on previously developed sites would place at risk the delivery of the housing requirement in the plan period.</p> <p>In this context it is considered that a sequential approach to previously developed land is neither justified, effective or in accordance with national planning policy. Indeed, there is no need for this objective to go any further than merely prioritising the re-use of previously developed land.</p>	<p>To achieve legal compliance and soundness it is considered that the second sentence of Policy 1 part i should be removed.</p> <p>In the light of the above the following changes are required:</p> <ul style="list-style-type: none"> •Amend second sentence in paragraph 1.7 to read: "It sets out a long term spatial plan for the District and its communities to 2028 and beyond and explains how change will happen". •Amend Policy 1 to read: <p>"Policy 1: Spatial Strategy for Harborough</p> <p>To maintain the District's unique rural character whilst ensuring that the needs of the community are met through sustainable growth and suitable access to services, the spatial strategy for Harborough to 2028 is to:</p> <p>a)Enable the development of 7,700 dwellings across the District during the period 2006-2028;</p> <p>i)Give priority to the re-use of previously developed land;</p> <p>These changes also need to be reflected in amendments to paragraphs 1.7, 1.8, 5.5, Table 2, Policy 2, Table 3, Table 4,</p>
2017/60	Merton College Oxford	Merton College supports the designation of Kibworth as a location for future housing growth given the sustainable attributes of the settlement, including the presence of retail and employment facilities, education provision and a rail station.	
2018/67	Thurnby and Bushby Society	Paragraphs 2.35 item P1, 3.6 item 3, 3.6 item 4, 4.1d, 4.1e, 4.1h, 4.1n; They are in line with Harborough Sustainable Community Strategic Vision paragraphs 5 and 6, and with Harborough Core Strategy Strategic Objective 3.	

Policy 2 Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
3654/582	Cllr S Galton	The proposed allocation of 2,762 dwellings is consistent with the figure set out in the RSS which the Council has not sought to challenge. I believe it will meet the housing needs of the District in the period up to 2026 but the distribution of housing should be a matter for the local authority in consultation with the local community. The proposed distribution is the outcome of that process and is in line with the Government's stated objectives on Localism.	None - I believe it is legally compliant.
2024/101	Kibworth Harcourt Parish Council	The Council is against the edict that a minimum of 40% of all new dwellings should be affordable in this area. The Council is pleased to note that no further housing or industrial development is scheduled for the Kibworths.	
3434/19	Mr R Egdsen	Local knowledge will provide a more realistic requirement than a national approach.	Make clear what weight local representation will carry in the process.
3454/21	The Owners of Overstone House	Whilst the allocation of new housing at Market Harborough is supported, the proposed strategic development area to the north-west of Market Harborough is not considered to be a suitable location for new development. The Council's Landscape Character Assessment Study rates land to the north-west as having a medium and low capacity to accommodate new development. In contrast, land to the south-east of Market Harborough is shown as being less sensitive to change, having a medium to medium high capacity to accommodate new development. Furthermore, land to the south-east and in particular Overstone House, constitutes previously developed land, which should be the focus for new development.	The Core Strategy should not preclude some development on the south-eastern fringe of Market Harborough in suitable locations
3438/25	Cllr M Rook	Evidence work completed for the original RSS. I consider communities can continue to live with those figures. Policy contains explanation of enhancements in stock numbers in sensible locations where industry and retail offer benefits community and where schools and health services are already in place.	
3539/82	Mr R Mitchell	It approaches the issue of new housing provision from the outdated and existing method that is based on numbers and does not take into account the actual land supply as controlled by price and taxation.	Not possible, it is a need to examine the supply issue from a new perspective
2021/90	East Midlands Housing Group	<p>We think that there needs to be balance between housing to be provided in the rural centres e.g. Kibworth, Fleckney etc and other smaller rural settlements where a need has been identified.</p> <p>Traditionally we would expect a Housing Needs Survey in rural villages to identify affordable housing needs and ideally to identify an exception sites to support the delivery of the housing. How would this work in the context of the proposals set out in the Core Strategy and will there be an Exceptions Site policy to support this approach? There is no reference to delivery of affordable housing in small rural villages and exception site policy to support this approach.</p>	<p>We think that there needs to be balance between housing to be provided in the rural centres e.g. Kibworth, Fleckney etc and other smaller rural settlements where a need has been identified.</p> <p>Traditionally we would expect a Housing Needs Survey in rural villages to identify affordable housing needs and ideally to identify an exception sites to support the delivery of the housing. How would this work in the context of the proposals set out in the Core Strategy and will there be an Exceptions Site policy to support this approach? There is no reference to delivery of affordable housing in small rural villages and exception site policy to support this approach.</p>
2029/130	Davidsons Group	<p>Policy 2 – Overall Approach to scale and distribution (explained by paragraph 5.7)</p> <p>The development plan for the District currently comprises the saved policies of the 2001 Local Plan and the East Midlands Regional Plan and will, in time, include the Core Strategy. Following</p>	

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		<p>the publication of the draft localism bill which proposes the abolition of Regional Strategies there is some uncertainty over the future status of the Regional Plan.</p> <p>The Government has stated its view that, in the absence of Regional Strategies, local authorities may rely upon the housing evidence prepared for Regional Strategies and the totals submitted to the Examination in Public as a basis for their 'locally derived figures'. This is the approach that Harborough District Council has taken. In this context the status of the Regional Strategy is not critically important to the District's overall housing requirement.</p> <p>However, to rely upon the overall housing requirements of the Regional Strategy but discard the overall distribution strategy of 'urban concentration' upon which it is based represents an incoherent approach to meeting housing need and demand, and is likely to result in the under-provision of housing at the larger settlements within the district, particularly Market Harborough. Indeed, Policy Three Cities SRS 3 of the Regional Plan requires that of the 7,000 dwellings proposed in the period 2006-2026, 40 dwellings per annum should be within or adjoining the Leicester Principal Urban Area (PUA) and in the rest of the district mainly at Market Harborough. To significantly depart from this position risks that the strategy will not be found to be sound as it has not been properly justified. The publication Core Strategy's proposed distribution results in less than half the provision of the rest of the district being located at Market Harborough.</p>	
2031/138	Foxton Parish Council	<p>Part b): Unsound because it will increase traffic on local roads in NW MH by 2-3000 vehicles. We are concerned that the traffic problems associated with this proposal are being white-washed by talk about encouraging alternative modes of travel. It is obvious that residents of any such estate are extremely unlikely to cycle or walk or use buses – very few other residents of Market Harborough or its surrounding villages do. The proposal does not make any contribution to the aims of the LDF. There is no infrastructure for this area; it will reduce the green area between MH and Lubenham, Gartree and Foxton; it does not respect the historic and compact nature of MH. It is probably the least appropriate site for housing development because of the lack of roads and its potential for damage to the rural nature of the area. Sites to the south of MH would be much more suitable due to the proximity to major routes. In addition, access to MH is much easier and less prone to delays than from the north.</p> <p>Unsound because it conflicts with stated aims incorporated in paragraphs 3.6.5 (protect landscape), 3.6.6 (character of built environment), 3.6.8 (To promote good design which respects, and where possible enhances, its surroundings), 4.1, Policy 1, (b) Develop Market Harborough's role as the main focus for additional development within the District, promoting its historic function as a market town and safeguarding its compact and attractive character); Policy 11 a) Development should be inspired by, respect and enhance local character,</p> <p>Ineffective because it has no possibility of mitigating traffic problems generated by the development and because it conflicts with most of the stated aims of the LDF Core Strategy.</p>	Should specify more investigation into alternative sites to the south of MH, near main routes. It should also specify how traffic problems will be prevented, to ensure maintenance of quality of life in this area, in the case of Airfield Farm being the ultimate choice.
2031/139	Foxton Parish Council	<p>Part d): Unsound because it is meaningless, basically saying we will maintain current limits to development except where we don't. The wording renders the aims meaningless and leaves it too open to different interpretations.</p>	It should be more definite: Current limits to development will be maintained, except in extraordinary circumstances where a change is completely unavoidable.
3668/143	Mr N Renner	<p>We support the allocation of further housing to the Leicester urban fringe, but feel that the numbers being allocated should not be reduced and transfered to other parts of the District. Leicester is a regional City and should be the focus of further housing reflecting this highly sustainable location, and avoid residents in new housing elsewhere in the District having to commute longer distances to work in Leicester.</p>	Retain the housing allocation for the Leicester Urban Fringe at 650 dwellings.

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3668/144	Mr N Renner	The need to achieve minimum housings densities has been removed from PPS3. This part of the policy should be deleted to reflect this approach. Unsound because it is not Consistent with national planning policy.	Remove this part of the policy.
3685/165	Fleckney Parish Council	The allocation of 376 new houses in the Plan period up to 2026 to Billesdon, Fleckney, Husbands Bosworth and Ullesthorpe and at selected rural villages does not put any upper limit on numbers in any one location. This is a particular concern for Fleckney where existing infrastructure and services are insufficient to support a large increase in the number of houses coupled with its poor transport links to any major routes within the District.	The Rural Centres of Billesdon, Fleckney, Husbands Bosworth and Ullesthorpe should have specified a maximum number of dwellings.
3665/167	Mr & Mrs Crane	The proposed housing distribution, in particular the allocation of 300 dwellings to Broughton Astley, is not sound since it is not effective. There is acknowledgement throughout the document (at paragraphs 2.8, 2.26, 2.36, 5.65, 6.43, 6.44, 6.50, 6.51, 6.52 and 6.53) that the provision of services, facilities, employment opportunities and retail floorspace has not kept pace with the development of housing in Broughton Astley. In order to address this deficiency further development should be allowed to facilitate delivery of new services; it is essential that further development is encouraged to redress this imbalance. This cannot be achieved with the modest level of 300 dwellings proposed. Broughton Astley has been given equal status with Lutterworth under Policy 1 as a “Key Centre” therefore should receive an equal level of new dwellings. Lutterworth does not suffer from the acute lack of services as Broughton Astley does so is therefore not in such great need of housing to deliver these services, yet has been allocated a higher level of housing. Additional development in Broughton Astley will enable the infrastructure/services gap to be addressed and ameliorated as new development will help to deliver essential infrastructure and services needs. Broughton Astley is a sustainable location for development. It already benefits from schools, a college, doctors, post offices, a church, petrol station and a bus service but further development could help to deliver additional services. For example, a key infrastructure issue in the district is the small capacity of existing schools to take an increased number of pupils. A site exists in Broughton Astley adjacent to the Hallbrook Primary School. A new development at this location would not only make the usual contribution to school places but the site owner is also willing to donate additional land to the school to enable expansion of the school site. Whilst this distribution aims to maintain Market Harborough as the main retail and sub-regional centre in the District whilst retaining its unique character and position as a market town, it still allocates 1,200 new dwellings. This would be a significant expansion therefore this is not effective at delivering the aim or maintaining it as a market town. It is appropriate that the minimum requirement of 40 dwellings per annum should be located in the PUA since it would result in lower levels of development and hence deprivation of services and facilities in other areas. There is a strong question over the deliverability of growth in the PUA whereas other locations within the District may be more easily able to accommodate it. Part f) sets out minimum density requirements. This element of the policy is no longer in accordance with national policy, thereby making it unsound. Density requirements were found in PPS3 at the time of the previous Core Strategy consultation; however, since this time they have been removed. Paragraph 5.22 further explains the density requirements and this should also be removed in order for the document to be sound.	Part b) The allocation to Market Harborough should be reduced to 1,000 in order that development is not so significant and the 200 dwellings should instead be added to the 300 proposed for Broughton Astley. Part b) The allocation to Broughton Astley should be increased to 500 dwellings in order to facilitate the delivery of new services. Part f) and paragraph 5.22 should be deleted.
2033/174	Leicester City Council	The City Council supports Harborough DC’s decision to retain the overall housing target set out in the RSS. It also understands the reasons for redistributing housing to reduce the number in or adjoining the Leicester Principal Urban Area and has no objection to that change. However the term ‘Leicester urban fringe’ is not defined. Such new terminology could be confusing when the RSS identifies the Leicester Principal Urban Area and that term is used in the adopted Leicester, Oadby and Wigston and Hinckley and Bosworth Core Strategies. The East Midlands Regional	Replace the term “Leicester urban fringe’ with ‘Leicester Principal Urban Area’

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2034/176	De Montfort University	<p>Plan (RSS) still forms part of the Development Plan. The RSS refers to wider urban areas as 'Principal Urban Areas' and the term is used in the adopted Core Strategies of Leicester CC, Oadby& Wigston BC and Hinckley& Bosworth BC. By not defining the Leicester Principal Urban Area this Core Strategy is not effective because it does not have coherence with the strategies of neighbouring authorities. By introducing additional terminology the policies may prove more difficult to implement.</p> <p>RPS object to sub-section b) of Policy 2 in that it only allocates the minimum requirement of 2,726 dwellings and does not make allowance for consented or allocated sites not being delivered or for difficult market conditions during the next 16 years. RPS consider that additional dwelling numbers should be allocated in order to make allowances for this and would suggest at minimum 3,000 dwellings be allocated through the CS. RPS also strongly object in terms of the proposed distribution of dwellings across the District's settlements as it does not represent a balanced approach to development across the District. RPS do not consider there is realistic capacity for 1,200 dwellings to be concentrated at Market Harborough, which would form 44% of the District's total distribution, particularly as 1,000 of these dwellings are to provided by a single strategic development area. In addition the proportion of dwellings within Rural Centres and rural villages at 14% or 376 dwellings is considered to be unrealistic and unsustainable. In our view the dwellings should be distributed across the District in accordance with the principles of the RSS and where the SHLAA has identified potential capacity. The SHLAA has identified capacity in the Leicester Urban Fringes for 3,871 units. Given this, the CS's proposed delivery of just 350 dwellings in the Leicester urban fringe, or 13% of the District's distribution, would be contrary to RSS Policy 3 which seeks to concentrate development primarily in and adjoining the PUA. It appears illogical that the proportion of the District's housing provision within the Leicester urban fringe has been reduced from the previous stage of the CS to just 350 dwellings or 14%. No justification has been provided and indeed CS Pre-Submission paragraph 5.10 states:-</p> <p>"The settlements of Scraptoft, Thurmby and Bushby, which straddle the A47 to the east of Leicester are contiguous with the built up part of Leicester and by virtue of their proximity and access to higher order services and facilities within Leicester, are considered a suitable and sustainable location for future housing development. " It is important that a balanced approach to housing delivery is bought forward through the CS. For instance it is only right that the Leicester urban fringe/PUA receives a sufficient proportion of the housing requirement. At the heart of the Leicester PUA is Leicester City Centre with its concentration of services, cultural and leisure facilities, employment and housing, with other settlements (including Scraptoft) forming part of a ring around Leicester and creating a relatively compact urban form. The focus must therefore be placed on ensuring the urban renaissance of Leicester as the principal urban City in the sub-region by concentrating housing, economic restructuring and infrastructure within the City. Whilst the delivery of other brownfield/vacant land will be identified as having development potential within the wider Leicester PUA, it is important to recognise that this on its own will not be sufficient in terms of meeting the districts entire housing requirement to 2026; and therefore there will be a need to secure a managed release of a range of Greenfield sites within and adjoining the Leicester PUA. This will go some way to ensuring cohesive communities, with a mix of age and tenure groups based within quality sustainable environments and the delivery of a range and mix of housing, including an appropriate amount of affordable and aspirational family housing. The strategy should therefore adopt a logical approach to development, which fully utilises available housing land capacity and recognises the role and need for sustainable urban extensions at the District's main settlements. This will assist with the regeneration of larger villages, such as Scraptoft, through encouraging public transport investment; ensure provision of affordable housing and a mix of dwelling types, as well as sustaining existing service provision in those settlements. This would represent a more balanced approach to development and would</p>	<p>RPS consider Policy 2 of the CS Publication Version should be revised to provide a distribution which focuses development equally at the Leicester PUA and those larger settlements which offer existing services and facilities. Through the use of sustainable urban extensions, such as on land north of the former Scraptoft Campus, a genuine opportunity is provided for the provision of mixed communities and affordable housing provision. It provides greater opportunity to sustain existing service provision through preventing development upon the Green Wedge and designated Areas of Separation.</p>

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2036/182	William Davis Limited & Hallam Land Management Limited	<p>provide sufficient developable land within Leicester PUA and adjacent to existing settlements within the district. As opposed to the relatively concentrated strategy of directing significant levels of housing towards Market Harborough, it will sustain and improve existing service and facility provision in the District's key settlements. As with the specific case of land north of Scraptoft Campus, developable, constraint free land exists on the edge of the existing settlement, outside the area of separation and Green Wedge, which will enable investment in public transport provision and avoid the creation of unacceptable levels of pressure on the local road network.</p> <p>The strategy for delivering housing in the district reflects the overall level of housing requirement in the Regional Spatial Strategy (RSS), currently part of the Development Plan and based on evidence of market conditions and economic development forecasts. The RSS also sets out a requirement to deliver 40 dwellings per annum adjacent to the Leicester Principal Urban Area (PUA), or 800 overall. Whilst the Core Strategy would only set out to achieve 768 dwellings against this requirement, we find this to be in 'general conformity' with the Regional Plan, as set out in Planning Policy Statement 12: Local Spatial Planning (PPS12) paragraph 4.33. The evidence to underpin this local interpretation of the RSS is contained in the spatial portrait and priorities for the area, which seek to safeguard the identity of certain communities adjacent and on the edge of the PUA. It also reflects further consultation with local stakeholders including Councillors and Parish Councils, taking into account the emerging freedom to distribute development in line with community needs and objectives under the Localism Agenda.</p> <p>Policy 2(d) sets out that existing 'limits to development' in Local Plan Policy HS/8 would be maintained, but would be reviewed either by granting planning permission or allocating sites in a Site Allocations DPD. We would submit that the Strategic Development Area (SDA) north west of Market Harborough is central to the achievement of the Core Strategy and, as such, it should set this out as an allocation.</p> <p>PPS12 sets out (at paragraph 4.6) that Core Strategies may allocate strategic sites for development and that these should be those sites considered central to achievement of the strategy. The SDA is the only one in the district and it is where development in the district will be focused. It relates to the district's main settlement and proposes a significant level of new housing development. Without this level of housing development in this location being secured through a clear delivery mechanism, the strategic objectives of the Core Strategy would not be achieved. We believe that Policy 1 acknowledges this by specifically listing the development of 1,000 dwellings in the SDA as a criterion. Therefore we consider that Policy 2 is ineffective in this respect, failing the test of soundness.</p> <p>We consider that it is clear that the SDA relates to Airfield Farm. The Airfield Farm development, to the north west of Market Harborough, would provide 1,000 dwellings and we have undertaken considerable assessment and consultation in order to support a proposal that will be subject of an outline planning application in January 2011. This includes an Environmental Impact Assessment, which is complete and can be submitted for your review, which identifies a number of positive impacts along with mitigation to deal with negative effects. The application also includes a Design & Access Statement which sets out how a new community of 1,000 dwellings could be delivered in a well designed, high quality development. The application will seek detailed approval for access to the site, supported by Transport Assessment and in accordance with relevant highways guidelines.</p> <p>Our approach to the assessment and design of the Airfield Farm development has been, as a first step, to consider ways in which we could limit the use of the car. This follows recommendations in paragraph 6.9 of the evidence base document 'The Leicester & Leicestershire Integrated Transport Model (Preliminary Base Highway Model): An Assessment of Transport Impacts of Alternative Development Scenarios at Market Harborough' (August 2010). The development</p>	<p>The Airfield Farm site should be subject of a strategic allocation. The first bullet point of Policy 2 (b) should be amended to say: 1,200 dwellings will be provided at Market Harborough. This includes the allocation of land for approximately 1,000 dwellings immediately to the north west of Market Harborough. The land is allocated in this Core Strategy, as shown on the Proposals Map, subject to the criteria in Policy 13. The plan referred to would identify the site outlined in red in the plan accompanying this representation.</p> <p>Accordingly, criterion 2 (d) would be amended to say: d) Except where land is allocated north west of Market Harborough, as shown in the Core Strategy Proposals Map, maintaining existing Limits to Development (as set out at saved Local Plan policy HS/8 and identified on the Local Plan Proposals Map) for the purposes of considering planning applications and reviewing these where necessary following the allocation of sites for development or by the granting of planning permission; This would make Policy 2 sound because it would make it effective in delivering the main development proposal in the Core Strategy, which is central to the achievement of the Core Strategy objectives.</p>

proposals include a range of community facilities which would provide for the everyday needs of the new community, as listed below:

- Primary school – catering for families in the new community and potentially providing a more convenient option for families in the surrounding community; as such limiting travel.
- Local shopping facilities – a convenience store for ‘top up’ shopping, complemented by individual shops and services, which would mean that only the larger weekly shop and comparison shopping might need to be carried out elsewhere.
- Potential for provision of a doctors surgery in the local centre, if required by the Primary Care Trust.
- Provision of a community hall in the local centre, along with the marina pub/restaurant facilities, which would mean that leisure time could be spent within the site, avoiding travel elsewhere.
- Provision of significant outdoor recreational opportunities, including the marina, country park, sports and play areas and green routes, which encourage a healthy lifestyle and provide attractive routes for walking and cycling towards the town centre. Bus provision would be provided through the development, linking with Market Harborough centre and the rail station and provided at an improved frequency. This would not only provide enhanced bus services for the new community, but it would also benefit existing communities on the route, which could have a positive impact on existing traffic levels. The proximity of the site to the Airfield Farm Business Park also provides benefits for pedestrian/cycle links from the proposed residential development.

As part of the proposed planning application, a Framework Travel Plan would be provided detailing how alternative modes of transport to the private car could be promoted. This would include such incentives such as free public transport use (for a specified period), free or discounted bicycles or equipment and personal travel planning, which would be overseen by the site Travel Plan Co-ordinator, who would be appointed three months prior to first occupation on-site. The Travel Plan target would be for a 10% modal shift from single occupied vehicles to alternative modes of transport and this target would be supported by the measures and initiatives set out in the Travel Plan Framework.

There is considerable evidence available to support the strategic allocation of the Airfield Farm site in the Core Strategy. If the Airfield Farm site was made subject of a strategic allocation it would reduce work on the Site Allocations DPD, enabling resources to be used on the other spatial choices to be made. It would reflect the considerable work, consultation and liaison with officers that has taken place already, rather than repeating it.

We are aware that progress on the Core Strategy should not be held up by the inclusion of non strategic sites. We consider that the Airfield Farm site is a strategic site in the context of the district and we are confident that progress would not be held up, since the site has been subject to EIA and this has not identified any significant constraints to development or requirements for unusual mitigation.

Because the Core Strategy looks to the long term, PPS12 (paragraph 4.7) says that it may be beneficial to delivery of Core Strategy objectives for details of key sites to be included in it, for example where investment requires a long lead-in. We would submit that the certainty of a strategic allocation would provide the necessary impetus in discussions regarding infrastructure and developer contributions with all parties concerned. Without a strategic allocation, the delivery of Policy 2 is less certain and is in this respect ineffective, failing the test of soundness.

PPS12 also warns (at paragraph 4.7) against including site specific detail which can date quickly. However a strategic allocation for Airfield Farm will not date, since Airfield Farm is central to the achievement of the strategy and it will be delivered over the lifetime of the plan period. Evidence to underpin the development of the Airfield Farm site has been prepared by the Council and by our consultant team over a number of years and this is up to date and will continue to support a strategic allocation.

We also consider that the strategic allocation of Airfield Farm would limit risks to the delivery of

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		<p>the Council's housing strategy. In the absence of a 5 year housing land supply the Council is vulnerable to 'planning by appeal'. The strategic allocation of Airfield Farm would allow for a quicker delivery mechanism and a more robust presentation of housing land availability. There are already a number of planning applications pending consideration by the Council, proposing significant numbers of dwellings adjacent to the PUA, beyond requirements set out in the RSS or emerging Core Strategy. The strategic allocation of Airfield Farm would assist in defending the Council against such proposals, which could threaten achievement of a central objective of the Core Strategy.</p> <p>We note that Policy 2 (e) of the Core Strategy would potentially allow for Airfield Farm to come forward in advance of a Site Allocations process, in the circumstances of a lack of 5 year housing land supply. However this is not reliable and does not provide us with necessary certainty in taking forward a major planning application. 5 year housing land supply is constantly subject to change and we require a sure footing in order to progress proposals through the planning process. Again, the lack of certainty surrounding this delivery mechanism means that Policy 2 is ineffective.</p> <p>With regard to the specific limits of a strategic allocation, we would propose that it is based on the application site area for our proposed planning application, as shown in the plan accompanying this representation. The application site area has been defined following a masterplanning exercise, review of deliverable land ownerships and Environmental Impact Assessment. There would be no need for further work to define the site area.</p>	
2038/188	Langtree Group PLC	<p>The Document sets out that the housing requirements for Market Harborough District have been carried over from the East Midlands Regional Spatial Strategy. Langtree support this decision to carry forward the long term housing requirements; however the housing requirement should be a minimum figure as set out within the RSS, rather than treated as a ceiling.</p> <p>The approach to the calculation of the remaining housing requirement in Table 2 is considered unsound. The figure given in Column C is based upon assumptions and is not robustly and soundly justified by the Council. It is based upon committed development proposals, however it should be noted that there is no certainty that all the proposals will come forward, particularly in the current economic climate. We would therefore question the robustness of this figure. It cannot therefore be used to calculate the 'remaining housing to be found' given in Column D.</p> <p>Furthermore, Langtree believe the Council should incorporate a non-delivery rate within Column D. Best practice and Government guidance indicate that a 10 percent non-delivery rate should be incorporated into a housing trajectory. The housing trajectory in Appendix 1 shows no housing provision above 7,000 dwellings by 2025/26 and therefore 0 percent flexibility, which is insufficient for the growth and housing needs of the Borough.</p> <p>A 10 percent non-delivery rate provides a flexibility allowance in the overall housing numbers. We believe this will provide an overall buffer in the housing supply and ensure that Harborough District achieves the housing requirement and growth. Nevertheless, the level of housing provision must be based on deliverability and the baseline evidence must be robust to achieve the appropriate level of housing, otherwise the flexibility allowance will have little impact.</p> <p>The level of housing indicated in Table 2 Column D needs to be robustly justified and should incorporate an element of flexibility to ensure delivery of the overarching approach to housing land. At present, Langtree consider that the approach is unsound.</p> <p>The approach to the distribution of housing within part (b) of Policy 2 is considered to be too prescriptive and therefore too restrictive with regards to long term provision, and could therefore</p>	<p>Proposed Changes</p> <ul style="list-style-type: none"> • Incorporate a 10 percent non-delivery rate within the housing requirement. • Reduce over-reliance on single site by identifying further potential development sites and flexibility within the plan. • Incorporate broader strategic levels and percentages within Policy 2 for housing delivery for each settlement rather than specific housing figures to ensure more flexibility for developers and to allow delivery. • Increase site allocations on Brownfield land to improve sustainability and reflect the spatial strategy.

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		<p>render the document unsound as required within PPS12. In order to ensure it is sound, the Core Strategy document should set the overarching strategic spatial direction policy for the borough, not specific housing figures and allocations for each settlement.</p> <p>The disaggregation to numbers of homes for individual settlements would be more appropriately handled during the Allocations stage. The approach is currently too inflexible and could lead to the Core Strategy being unsound, especially with the terminology of the policy stating that the distribution of new homes will be “in accordance with the following distribution”. As drafted it appears that Policy 2 of the Core Strategy has pre-empted the determination of sites.</p> <p>The Inspector in response to the Wakefield Core Strategy considered a similar approach where she concluded that the table should be deleted as the figures are potentially misleading, do not take account of any future review and “could be used inflexibly in making decisions on planning applications”.</p> <p>The Core Strategy should provide the direction of growth and the approach should therefore be replaced with guiding principles for the settlements. This is similar to other authorities and would allow the Council flexibility in determining the allocations. A broad headline percentage rather than a target figure would provide flexibility. The indicative figures and identification of sites would be taken forward through the Allocations DPD.</p> <p>Section (b) under Policy 2 sets out that 1200 dwellings will be provided at Market Harborough, of which 1000 will be within a Strategic Development Area (SDA) to the North West of Market Harborough. We consider that to allocate 1000 of the 1200 dwellings for Market Harborough to a single site is an ambitious strategy. This strategic site accounts for 83 percent of the housing for Market Harborough and over a third for the District during the Core Strategy period. Langtree support the principle of the SDA, however there needs to be recognition that there is no guarantee that this single site will come forward as expected by the Council. There is too much reliance on one site to deliver the majority of the housing delivery for the Borough. It is therefore questionable whether a sufficient number of dwellings can be delivered and whether the document is sound. Page 4 of 9</p> <p>Furthermore, an inherent contradiction exists within Policy 2 in that section (c) states that priority for development will be given to Brownfield or Previously Developed Land, which echoes the Policy 1 Spatial Strategy for the District, however 83% of dwellings in Market Harborough are to be provided on the SDA, which is a Greenfield site. The priority cannot therefore be said to be towards Brownfield sites as this is not reflected within the strategy of the document.</p> <p>Section (f) within Policy 2 sets out density standards, with a density of 40dph required in sites within and adjacent to the principal shopping areas of Market Harborough and 30dph elsewhere in the district. PPS 3 sets out that Local Authorities should develop density requirements based on local circumstances, and that ‘The density of existing development should not dictate that of new housing by stifling change or requiring replication of existing style or form’. We consider that Policy 2 is too restrictive in this respect, and more flexibility should be allowed to ensure variable and innovative design and to ensure delivery is not restricted. The Council should not ‘require’ certain density standards, but should provide guidance on levels required as set out in Best Practice guidance.</p> <p>As the policy is currently drafted it is too rigid and inflexible and not in accordance with Government Guidance. It also relies too heavily on one single Greenfield site. It is therefore considered unsound.</p>	

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2039/194	Mr & Mrs Woodcock	<p>Policy 2 confirms that the total housing requirement for Harborough District will be 7,000 dwellings between 2006 and 2026. Taking into account completions and commitments, this leaves a residual amount of 2,726 dwellings to be allocated.</p> <p>Policy 2a) states that "any shortfall in the delivery of current commitments will be made up by the granting of planning permission for the settlement concerned." Firstly, additional supply within any settlement clearly relies upon the availability of sites and the willingness of developers to submit planning applications. The policy does not explain where this source of supply will come from.</p> <p>Secondly, in the case of the Rural Centres, where current commitments fail to come forward, it should be possible to meet the district's housing requirements at suitable sites in one of the other Rural Centres. The wording of this policy is therefore too restrictive and is unsound on the basis that it is not effective.</p> <p>Policy 2b) Part b) of the policy indicates how the overall housing requirement will be distributed across the district. The allocation for the Rural Settlements of Fleckney, Billesdon, Ullesthorpe and Husbands Bosworth and selected rural villages is 376 dwellings.</p> <p>We support the identification of Billesdon as a Rural Centre. The settlement has a wide range of key facilities and services as well as a regular bus service linking the settlement to higher order services and job opportunities in Leicester and Upping ham. As such, the Core Strategy correctly recognises that Billesdon is able to support future housing growth. Policy 2d) It is considered that this part of the policy is not effective and is not justified by evidence. The limits to development as defined in the 2001 Local Plan were reflective of the development requirements of that Plan and the material circumstances at that time. The extent of these limits to development around settlements needs to be reviewed and updated. In this context it is clear that the requirements of the rest of Policy 2 will necessitate amendments to these boundaries and therefore the material weight which the limits to development are given in the determination of future planning applications will be diminished. The recent decision of an Inspector in respect of an appeal against the refusal of planning permission at London Road, Markfield (Hinckley and Bosworth Borough ref PP/K2420/A/10/2125649) supported this view.</p>	<p>Policy 2a) To achieve soundness it is considered that it would be prudent to include a 10% non-implementation allowance on commitments. Commitments at 2010 are 2,433. In total a further 238 dwellings should be provided for across the District.</p> <p>It should also be made clear that Rural Centre commitments that fail to come forward can be reallocated to suitable sites in other Rural Centres.</p> <p>Policy 2d) We suggest deletion of part d) of Policy 2. This would ensure consistency with the rest of the Core Strategy document, which proposes development adjoining existing settlements.</p>
3628/202	Dr K Feltham	The proposed balance and distribution of housing, detailed in Policy 2 b), will provide sufficient to meet the target and be fair to communities - including rural villages where sustainability is critical.	
3628/203	Dr K Feltham	Leicester Urban Fringe infers an "urban" area, yet "rural areas immediately adjacent to the built up part of neighbouring Oadby in the vicinity of the A6 corridor" are also specified.	Paragraph 5,10 needs to be modified to be consistent with paragraph 5.26 which mentions Great Glen separately from the Leicester Urban Fringe.
2064/575	Persimmon Homes North Midlands	<p>Time Horizon of Core Strategy: It is considered that the Core Strategy is not legally compliant and is unsound because the planned time horizon for the document will be less than 15 years from the date of adoption to the end of the monitoring year 2026. This fails to conform to national planning policy set out at paragraph 4.13 of PPS12.</p> <p>Paragraph 1.8 and Table 1 of the document sets out that it is expected that the expected adoption date is late 2011. In terms of housing delivery this is well into the monitoring year 2011/2012. A 15 year time horizon would take the Core Strategy into at least 2027.</p> <p>The time horizon has particular significance for the delivery of housing and therefore Policy 2. PPS3 paragraph 53 requires that "local planning authorities should set out in their Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous</p>	<p>The Core Strategy should work to a time horizon beyond 2026. It is logical, in the absence of a review of a Regional Strategy, to work to a period which reflects the most recent household population projections.</p> <p>A time horizon of 2028 reflects a twenty year period from the base year of the most recently published national household projections (2008), and gives the Council until April 2013 to adopt the necessary Development Plan Documents to allow a continuous supply of housing for a 15 year period in accordance with PPS3. Indeed, this timescale accords with the Council's most recent draft Local Development Scheme (reported to Executive Committee December 20th 2010).</p> <p>The additional 2 year period and the associated additional housing</p>

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		<p>delivery of housing for at least 15 years from the date of adoption.” Given that the proposed Core Strategy does not actually allocate any specific sites to deliver housing, the time horizon of the Core Strategy should take account of the time required to prepare and adopt subsequent documents that will perform this role. In the context of the Harborough Local Development Scheme, the relevant document is the Allocations Development Plan Document and accompanying proposals map, together with a Community Infrastructure Levy Charging Schedule. An horizon of 2026 clearly does not allow sufficient time for the preparation and adoption of these documents, and therefore the proposed time horizon of the Core Strategy also fails the test of soundness on account of its lack of conformity to national planning policy. Table 2 and the first sentence of Policy 2 therefore do not accord with PPS3 advice.</p>	<p>requirements are not considered to be so significant to require substantial review of the Core Strategy preparation and would entail a scale of additional development which would not be so significant to require fresh assessment of its impacts.</p>
2064/576	Persimmon Homes North Midlands	<p>It is considered that the second sentence of this part of the Policy is not sound as it is not effective. Additional supply within any settlement clearly relies upon the availability of sites and the willingness of landowners and developers to submit planning applications. This statement does not explain where this source of supply will come from.</p>	<p>To achieve soundness it is considered that it would be prudent to include a 10% non-implementation allowance on commitments. Commitments at 2010 are 2,433. In total a further 238 dwellings should be provided for across the District.</p>
2064/577	Persimmon Homes North Midlands	<p>It is considered that the distribution of development planned for within this section is not justified because it is not the most appropriate strategy when all other strategies are considered. We have a number of specific points of objection:</p> <ol style="list-style-type: none"> 1. Whether the proposed requirement for Lutterworth can be delivered within the plan period on appropriate sites, whilst at the same time retaining sufficient employment land in the settlement, is questioned. Whilst the SHLAA identifies a potential capacity of 733 dwellings at Lutterworth, only 47 dwellings of this capacity comes from sites which are ‘deliverable’ in PPS3 terms and all of these are existing commitments. Of the 547 dwellings proposed at Lutterworth, capacity for only 47 exists on ‘deliverable’ sites. Of those identified as ‘potentially developable’, sites Lt002/09, Lt008/09, Lt012/09, Lt024/09 and Lt025/09 (total capacity 172 dwellings) each have existing occupiers and are in industrial use. Conversion to residential would involve the loss of a large proportion of employment uses within Lutterworth and may be constrained by noise and amenity issues. Furthermore, sites Lt018/09, Lt027/09, Lt033/09 and Lt034/09 (capacity 225 dwellings), together with sites Lt008/09, Lt024/09 and Lt025/09, are all adjacent to either M1 or A4303 meaning traffic noise may significantly constrain development. Furthermore, these sites have physical constraints associated with either access, flood risk or topography which would place in doubt their suitability for housing. 2. The proposed requirement for Broughton Astley of 300 dwellings of which 270 are to be affordable is unlikely to enable the provision of additional services and facilities. Instead it is likely to place further pressure on the limited number of existing facilities and services. In addition, the proposed 90% affordable tenure, as specified by Policy 16, is unlikely to be delivered in the current economic climate where there is a shortage of grant funding and its ability to contribute to meeting the housing requirement of the district within the plan period is therefore questioned. 3. Distribution for Market Harborough does not sufficiently reflect its role within the District, nor its status in the East Midlands Regional Plan. Market Harborough clearly functions as a service centre for the surrounding sub-region which is mostly rural. The town has a population of over 20,000 people and a good range of comparison and convenience shopping, together with schools, and a range of employment provision. This is significantly more sustainable than other locations in Harborough District. Its sustainability credentials role are reflected in the policy of the East Midlands Regional Plan, which requires that outside of the Leicester Urban Area, housing will be 	<p>To achieve soundness it is considered that the following changes are required, which are reflected in the amendments to table 3 below.</p> <ol style="list-style-type: none"> 1. Reduce the proportion of housing to be provided at Lutterworth to 6% of overall provision. This reflects the lack of deliverable housing sites which have been identified at Lutterworth. Over the period to 2028 a total of 350 dwellings is proposed. 2. Leave the provision for Broughton Astley as proposed to 2026 to reflect providing for affordable housing need if the availability of funding improves. 3. It is considered that there is capacity to absorb the increased requirement at Market Harborough. Firstly, through the increased requirement to be met by a strategic development to the west and north west of Market Harborough to 1,500 dwellings. <p>Secondly, it is considered that there is additional capacity on smaller sites within or adjoining Market Harborough. The Strategic Housing Land Availability Assessment identifies capacity for a number of smaller developments within and adjoining the Market Harborough urban area and representations made in respect of Policy 13 demonstrate that further suitable sites exist around the settlement boundary and will come forward over the plan period to deliver the additional 600 dwellings proposed.</p> <p>4. The requirement for the Leicester urban edge should be increased in line with the minimum requirements of the East Midlands Regional Plan. Total Provision over the plan period 2006-2028 needs to be increased to 882 dwellings therefore, leaving sites for an additional 485 dwellings to be identified.</p>

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		<p>located mainly at Market Harborough, including Sustainable Urban Extensions as necessary.</p> <p>The settlement has the ability to contribute more to housing land supply through the provision of a strategic development which is genuinely able to deliver associated benefits to the town, as well as the development of a number of smaller sites within or adjoining the existing urban area.</p> <p>4.The provision for the Leicester urban edge does not accord with Policy 13A of the East Midlands Regional Plan, which requires at least 40 dwellings per annum to be provided within or adjoining the Principal Urban Area of Leicester.</p>	
2064/578	Persimmon Homes North Midlands	<p>It is considered that part (d) of the policy is not effective and is not justified by evidence. The limits to development as defined in the 2001 Local Plan were reflective of the development requirements of that Plan and the material circumstances at that time. The merits for the particular limits to development around settlements needs to be reviewed and updated. In this context it is clear that the requirements of the rest of Policy 2 will necessitate amendments to these boundaries and therefore the material weight which the limits to development are given in the determination of future planning applications will be diminished.</p> <p>The recent decision of an Inspector in respect of an appeal against the refusal of planning permission at London Road, Markfield (Hinckley and Bosworth Borough ref APP/K2420/A/10/2125649) supported this view.</p>	Delete part (d) as boundaries must be reviewed as part of the Allocations DPD preparation.
2064/579	Persimmon Homes North Midlands	The net minimum density requirements set out in Policy 2(f) are inconsistent with guidance published in PPS3 (June 2010) which no longer seeks to set a national minimum requirement. It is unclear which parts of the evidence base support these broad minimum requirements across the district, particularly the 30dph required outside of the Market Harborough and Lutterworth central areas. In this respect the policy is not justified, effective or in accordance with national policy. Whilst the policy does seek to be flexible, it would be more effective were it to be significantly more refined, reflecting the guidance given in paragraph 46 and 47 of PPS3.	To achieve soundness this element of the policy needs to be supported by evidence to demonstrate that the type of housing likely to be required throughout the district can be provided at the densities sought.
3640/222	CASCET - Campaign Against the Stoughton Co-op Expansion Threat	The proposed balance and distribution of housing, detailed in Policy 2 b), will provide sufficient to meet the target and be fair to communities - including rural villages where sustainability is critical.	
2040/232	Westleigh Developments Ltd	<p>The Oadby and Wigston and Harborough District Council Assessment of Highways and Transport Implications, prepared by Ove Arup and Partners in 2009 advises that the provision of up to 500 new dwellings (and 6.75 hectares of employment land) could be supported without detriment to the village and it is considered that this provision should be made in the Core Strategy document. Not to do so would ignore highways and transport evidence without good reason or justification. The reason stated in paragraph 6.51 that 300 additional dwellings would give rise to a more balanced sustainable settlement that local people seek is not considered to be adequate justification because this would fail to recognise technical evidence ie. that up to 500 additional dwellings can be provided within the village without a significant impact. It would also give rise to a missed opportunity in relation to the provision of contributions towards much needed community facilities and in terms of not increasing the overall population in line with the provision of additional employment, retail, leisure and community facilities.</p> <p>An increase in the new dwelling provision of 200 for Broughton Astley could allow a proportionate reduction in the number of dwellings to be accommodated within or adjacent to Market Harborough. Development at Market Harborough is considered to be more difficult in</p>	<p>Increase the provision of new dwellings apportioned to Broughton Astley from 300 to 500 and reduce the number proposed for Market Harborough from 1200 to 1000 dwellings.</p> <p>Alter the text of Policy 3 to such that a minimum provision of 30% affordable housing is sought subject to the consideration of the viability of individual developments.</p>

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		<p>landscape terms due to its distinctive setting within a bowl. The suggested apportionment of 1200 dwellings for the town could have a significant and detrimental impact on its character, function and setting and whilst the development of the Airfield Farm site for employment purposes is supported, the appropriateness of this location for large scale residential development (of up to 1000 dwellings) is questioned.</p> <p>The provision of a minimum of 30% affordable housing in the housing market sub-area that contains Broughton Astley within Policy 3 is not sufficiently tested, in terms of its viability, in the 2009 Viability Assessment and additional flexibility is required in this respect.</p>	
2041/235	Barratt Strategic	<p>The Oadby and Wigston and Harborough District Council Assessment of Highways and Transport Implications, prepared by Ove Arup and Partners in 2009 advises that the provision of up to 500 new dwellings (and 6.75 hectares of employment land) could be supported without detriment to the village and it is considered that this provision should be made in the Core Strategy document. Not to do so would ignore highways and transport evidence without good reason or justification. The reason stated in paragraph 6.51 that 300 additional dwellings would give rise to a more balanced sustainable settlement that local people seek is not considered to be adequate justification because this would fail to recognise technical evidence ie. that up to 500 additional dwellings can be provided within the village without a significant impact. It would also give rise to a missed opportunity in relation to the provision of contributions towards much needed community facilities.</p> <p>An increase in the new dwelling provision of 200 for Broughton Astley could allow a proportionate reduction in the number of dwellings to be accommodated within or adjacent to Market Harborough. Development at Market Harborough is considered to be more difficult in landscape terms due to its distinctive setting within a bowl. The suggested apportionment of 1200 dwellings for the town could have a significant and detrimental impact on its character, function and setting and whilst the development of the Airfield Farm site for employment purposes is supported, the appropriateness of this location for large scale residential development (of up to 1000 dwellings) is questioned.</p>	Increase the provision of new dwellings apportioned to Broughton Astley from 300 to 500 and reduce the number proposed for Market Harborough from 1200 to 1000 dwellings
2041/236	Barratt Strategic	<p>Paragraph 5.21 suggests that the estimated yield from previously developed land sites in the SHLAA is only 883 of 9980. However, the Strategy also states that across the district during the plan period 35% of all housing could be delivered on PDL sites. This is despite the fact that during years 6-10 onwards, the majority of development would have to be on greenfield sites. This is considered to be contradictory and over aspirational particularly as a number of settlements, including Broughton Astley, can accommodate additional development on greenfield sites adjacent to the village without a significant impact.</p>	Delete the reference to the need to provide 35% of the new housing in the District on PDL sites within the plan period
2042/239	Western Range	<p>The suggested split of development set out in criterion b) is generally supported, however, development on the scale envisaged for Market Harborough is considered to be difficult in landscape terms due to its distinctive setting within a bowl. The suggested apportionment of 1200 dwellings for the town could have a significant and detrimental impact on its character and setting and whilst the development of the Airfield Farm site for employment purposes is supported, this location would have only longer term potential to accommodate the 1000 dwellings that are indicated for it.</p> <p>The apportionment of 376 dwellings to the six rural centres and villages is supported as developments in sustainable settlements such as Fleckney could make a meaningful contribution towards meeting the needs of the district without having any significant adverse consequences for</p>	<p>Increase the provision of new dwellings apportioned to the six rural centres and villages from 376 to 450 or 500 and reduce the number proposed for Market Harborough accordingly.</p> <p>Delete criterion c) from the text of Policy 2, as it is contradicted by evidence elsewhere in the CS.</p>

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		<p>the environment. An increase in the provision for the six rural centres and villages would relieve the pressure on Market Harborough and could bring benefits in terms of supporting falling school rolls and existing rural shops and services.</p> <p>Whilst the principle behind the suggested priority for brownfield over greenfield sites set out in criterion c) is not disputed, evidence contained at Table 6 of the draft Core Strategy suggests that the level of brownfield sites coming forward over the plan period will be significantly less than in previous years and this is acknowledged in paragraph 5.21.</p>	
2043/243	Stamford Homes Ltd	<p>The Development Plan should be the starting point for determining the acceptability of any proposals, including subsequent LDDs, as they should extrapolate the policies contained within the RSS's. Whilst their long-term future may be in doubt, the RSS is an important material consideration and one with which the Core Strategy must be in conformity.</p> <p>RSS 8 indicates that 40 dwellings per annum should be directed towards the Leicester Principal Urban Area (PUA), with at least half of the remainder towards Market Harborough. Any residual allocation should be distributed around the rest of the District. With 350 dwellings being directed towards the Leicester PUA, there should be a minimum of 1,188 dwellings for Market Harborough.</p> <p>The Core Strategy proposes 1,200 dwellings, identifying the minimum realistically possible as an allocation for this settlement. Given the primacy of Market Harborough in the settlement hierarchy and its associated sustainability, consideration of housing levels in excess of this minima is logical and in accordance with PPS 1's overall sustainable locations principles. Paragraph 6.8 of the Core Strategy Publication Version concurs with the sustainability credentials of Market Harborough in preference to all other settlements within the District.</p> <p>In the supporting evidence for the Core Strategy, only one document considers housing capacity in terms of absolute numbers for Market Harborough. This is 'An Assessment of Transport Impacts of Alternative Development Scenarios at Market Harborough (August 2010)'. This document considers two housing levels – 1,200 and 1,700 dwellings. The results, albeit based on the findings from a preliminary model, indicate that both solutions are possible from a highway perspective. The additional traffic for provision of 1,700 dwellings compared to 1,200 dwellings does not place significant additional pressure on the highway network. Further investigation of the opportunity to provide additional housing allocation to Market Harborough should be undertaken to define reasonable alternatives for evaluation, as outlined in PPS 12 (paragraphs 4.36, 4.38 and the box accompanying paragraph 4.52).</p> <p>Further analysis should also be undertaken on the other technical aspects to determine where/how much additional development can be accommodated within the settlement. Without any such analysis, the distribution of housing is not adequately justified, and does not represent the most sustainable option available. It is therefore not founded on a robust evidence base and is not in accordance with national guidance, and thus fails to comply with the Tests of Soundness, as set out in PPS 12.</p>	<p>Evaluation of the additional housing at Market Harborough to reflect the scale, function and sustainable credentials of Market Harborough compared to all other settlements within the District. Further technical research would better support determination of the level of housing feasible within/adjoining Market Harborough.</p>
2044/246	Barratt Strategic	<p>As indicated in a separate representation on policy 1, the definition of the Leicester Urban Fringe is considered to be too tightly drawn as it excludes land adjacent to Oadby, part of the Principal Urban Area (PUA) defined in the Regional Plan. As a consequence, it is considered that the provision figure of 350 is significantly under what could be reasonably achieved in the PUA without detriment to the character of the individual settlements and the District as a whole. The</p>	<p>Increase the provision of new dwellings apportioned to the Leicester Urban Fringe/PUA from 350 to 1100 as advocated in the October 2009 version of the Core Strategy and reduce the number proposed for Market Harborough from 1200 to 450 dwellings</p>

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		<p>PUA is considered to be the most sustainable development option given the well developed public transport links to the established and extensive services and facilities contained within the city of Leicester. The previous version of the Core Strategy document referred to approximately 1100 dwellings being provided within or adjoining the PUA and this is considered achievable given that up to 600 dwellings could be accommodated on the Springhill Farm site, as indicated on the master plan contained within the submitted Promotional Document. The remaining 500 dwellings could be accommodated within or adjacent to the remaining PUA settlements within Harborough District and it is understood that planning applications have been submitted for the development of various sites. Development at Thurnby, Bushby and particularly Scraptoft requires careful consideration given the known issues regarding landscape character and the transport capacity of the A47. Whilst it is understood that Parish Council representatives support the broad distribution of development set out in Policy 2, this can not alone set strategic policy which would fail to recognise the technical evidence contained within the Oadby and Wigston Borough Council and Harborough District Council Assessment of Highways and Transport Implications by Ove Arup and Partners which states that the development levels of the two Districts would have a relatively limited traffic impact on the highway network.</p> <p>An increase in the new dwelling provision of up to 750 for the PUA could allow a proportionate reduction in the number of dwellings to be accommodated within or adjacent to Market Harborough. Development at Market Harborough is considered to be more difficult in landscape terms due to its distinctive setting within a bowl. The suggested apportionment of 1200 dwellings for the town could have a significant and detrimental impact on its character and setting and whilst the development of the Airfield Farm site for employment purposes is supported, this location would have only longer term potential to accommodate the 1000 dwellings that are indicated for it.</p>	
2045/251	David Wilson Homes	<p>The suggested split of development set out in criterion b) is generally supported, however, development on the scale envisaged for Market Harborough is considered to be difficult in landscape terms and could lead to an over concentration new dwellings which would overload the services of the town and have a detrimental impact on its character.</p> <p>The apportionment of 376 dwellings to the six rural centres and villages is supported as developments in sustainable settlements such as Billesdon could make a meaningful contribution towards meeting the needs of the district without having any significant adverse consequences for the environment. An increase in the provision for the six rural centres and villages would give rise to a more even spread of development pressure, relieving the development pressure on Market Harborough and could bring benefits in terms of supporting falling school rolls and existing rural shops and services without being environmentally damaging.</p> <p>Whilst the principle behind the suggested priority for brownfield over greenfield sites set out in criterion c) is not disputed, evidence contained at Table 6 of the draft Core Strategy suggests that the level of brownfield sites coming forward over the plan period will be significantly less than in previous years and this is acknowledged in paragraph 5.21.</p>	<p>Increase the provision of new dwellings apportioned to the six rural centres and villages from 376 to 450 or 500 and reduce the number proposed for Market Harborough accordingly.</p> <p>Delete criterion c) from the text of Policy 2, as it is contradicted by evidence elsewhere in the CS.</p>
3602/263	Ms C Renner	<p>Although there is some controversy in relation to the weight that should be applied to the Regional Spatial Strategy, we believe that it is important to maintain the level of housing provision as outlined by the Regional Spatial Strategy, and we welcome the approach used by Harborough District Council. In terms of distribution of the dwellings into the relevant settlements, we would encourage a greater proportion of development to be directed to the Leicester Urban Fringe, as it is felt that this is the most sustainable part of the district in terms of</p>	

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		services. In terms of housing density, it is believed that the level of density should reflect the surrounding area, which is in line with current national planning policy.	
3613/272	Billesdon Parish Council	Strategic housing needs and the accommodation needs of the District are conflated; it is not possible to distinguish between the two categories of need. Consequently the justification for the housing need in Table 2 lacks a clear basis.	Provide a clear distinction in housing numbers between the Strategic and the District accommodation needs in paragraph 5.2 and as they contribute to Table 2.
3613/273	Billesdon Parish Council	No evidence is produced to justify the limitation of Rural Centres to 6 villages. There are more than 6 villages with the required number of services to be classified as Rural Centres. A selection process has been applied that is not in evidence.	Increase the number of Rural Centres in the list.
3613/277	Billesdon Parish Council	The dwelling density figures are too rigid and prescriptive and make no allowance for the characteristics of particular sites.	Add a statement showing that variation will be allowed from the dwelling density figures, on a site-by-site basis, to take account of local conditions.
3613/278	Billesdon Parish Council	There is no undertaking to consult with a local community (e.g. Parish Council) when considering the suitability of a site for the formal allocation of houses. This is despite 'Localism' being a priority for the current Government.	Add a statement guaranteeing consultation with a local community (e.g. Parish Council) when considering the suitability of a site for the formal allocation of houses.
3617/283	Bovis Homes	<p>The housing provision should be increased to meet the needs of the community. Any housing provision must be justified in the context of other evidence, including current and future levels of need and demand (Planning Policy Statement 3: Housing (PPS3) paragraph 33). Further, accompanying the announcement of the revocation of Regional Strategies, the Chief Planner's letter dated 6th July 2010 included a Technical Guidance which stated that 'any [housing] target selected may be tested during the examination process especially if challenged and authorities will need to be ready to defend them'. In this case, the level of housing provision suggested in the Core Strategy is not justified by reference to the likely housing needs of Harborough District. Instead, the suggested housing provision appears to be a politically expedient decision by adopting the housing provision in the East Midlands Plan for the period 2006 to 2026 (7,000 dwellings). No sound reasons have been advanced by the Council to retain the regional housing requirement. Housing Requirement The Leicester and Leicestershire Housing Market Assessment Managing and Updating of Data Projections (November 2010 - HMA) is an up to date document which does seek to identify the likely future housing needs of Harborough District based on a range of statistical information. The HMA indicates that the total net annual housing need for Harborough District is between 677 and 726 dwellings (Figure 22 EMRA Needs Estimates 2009). If this annual need is extrapolated, the housing requirement for the period up to 2026 would be between 13540 and 14250 dwellings (say 13,895 dwellings as an average). In simplistic terms, the suggested housing provision in the Core Strategy would just about meet 50% of the housing need arising within the District. Based on the representation to Policy H1 that the plan period should be extended to 2031, the annual HMA housing need equates to a requirement for between 16,925 and 18,150 dwellings (an average of about 17,222 dwellings for the period 2006 to 2031). The household projections, whether 2006 or 2008-based, indicate that the 'trend' identifies a greater demand for new dwellings arising during the period up to 2026 than proposed in the Core Strategy. The 2006-based projections published by the East Midlands Regional Assembly indicate that between 2006 and 2026 the number of household would increase by 10,800 at an average of 524 per annum. The CLG 2008-based projections suggest only 9,000 new households would be formed over the same period at an average of 450 per annum. Translating these households to a housing requirement suggests that the housing provision for the period 2006 to 2026 should be between 9,450 and 11,340. Utilising the same approach, the equivalent housing requirement for the period up to 2031 adopting the 2006 and 2008-based projections would be between 11,550 and 13,755 dwellings. This is Bovis Homes' preferred housing provision based</p>	<p>Reflecting the representation to Policy 1, the following suggested change to Policy 2 are sought. Either replace the first sentence of the policy with:</p> <p>a) 'The District's total housing requirement of 12,300 dwellings will be provided in a sustainable manner, by:'</p> <p>Or if the end date of 2026 is to be retained</p> <p>b) 'The District's total housing requirement of 10,000 dwellings will be provided in a sustainable manner, by:'</p>

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		<p>on the representation concerning Policy 1 and the extension of the plan period. Finally, the completion rates within the District since 2006, which covers both economic boom and downturn periods, suggest that over a four year period an average of 460 dwellings per annum were completed. Extrapolating this completion rate would derive a housing requirement of 9,200 dwellings during the period 2006 to 2026 or 11,500 dwellings for the period 2006 to 2031. The various housing provision figures for the period 2006 to 2026 can be summarised as: Core Strategy: Pre Submission - 7,000 dwellings HMA (average) - 13,895 dwellings Household Projections 2006-based - 11,340 dwellings Population Projection 2008-based - 9,450 dwellings Completion Rates - 9,200 dwellings. The various housing provision figures for the period 2006 to 2031 can be summarised as: Core Strategy (extrapolated) - 8,750 dwellings HMA (average) - 17,222 dwellings Household Projections 2006-based- 13,755 dwellings Population Projection 2008-based - 11,550 dwellings Long Term Completion Rates - 11,500 dwellings The consequences of not meeting the likely housing needs and demands are, following Kate Barker's Review of Housing Land Supply, now relatively well understood. A lack of new homes impacts on house prices, economic growth and social inclusion. It is also noted that the Council is potentially assuming neighbouring authorities will be responsible and effectively adopt the now revoked housing provision from the East Midlands Plan. There is currently no certainty that this will occur albeit it is outside the scope of the forthcoming Examination in Public to speculate on what may or may not happen and what this might mean for Harborough District. However, it does suggest that a cautious approach should be adopted to ensure that the housing provision is sound as required by PPS12 and highlighted by the Chief Planner. Accordingly, Bovis Homes propose that the housing provision should increase to a minimum of 12,300 dwellings for the period 2031 (or if the end date remains 2026 the minimum provision should be 10,000 dwellings). The approach adopted is to use an average of the household projections and completion rates. A minimum provision is proposed to retain flexibility and reflect the information contained in the HMA. As a consequence, the 'to find' housing figure increases to 8,026 dwellings for the period up to 2031 (or 5,726 dwellings for the period up to 2026) after discounting completions and commitments. This level of additional growth seeks to provide a balance between meeting the housing needs of the local community and preserving the environment of the District.</p>	
3617/284	Bovis Homes	<p>To reflect Bovis Homes' representations concerning Policy 1 and the housing provision, amendments are required to the housing distribution. The housing provision should be increased to meet the needs of the community.</p>	<p>This aspect of the representation should be read alongside Bovis Homes' concerns about the spatial strategy identified in Policy 1. The Core Strategy rightly identifies a hierarchy of settlements where growth should be directed. However, the housing distribution is flawed and the Core Strategy is unsound. One important aspect of the emerging planning system is for there to be community involvement concerning where growth should occur and there is, in the Localism Bill, the provision for the preparation of neighbourhood plans. In this context, the distribution of housing provision between the named settlements can be considered premature without the input from the local community about how much and where development might occur. Further, there have been limited discussions about the implications of growth and what benefits the local community may wish to secure, whether through the Planning Obligation/Community Infrastructure Levy payments or the New Homes Bonus. Accordingly, it would be appropriate for the existing hierarchy of settlements to be identified in Policy 2 but the specific housing provision deleted. The precise number of new homes can be established through a neighbourhood consultation exercise and the results incorporated into the Site Allocations Development Plan Document. In the alternative, if a distribution is to remain then there is a need to reflect the housing provision identified by Bovis Homes of a</p>

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			<p>minimum 12,300 dwellings to 2031 (or 10,000 dwellings to 2026). Accordingly, the suggested change which Bovis Homes would seek to Policy 2(b) is as follows and reflects the representation made concerning the settlement hierarchy under Policy 1: The allocation and development of sites for net additional residential development in sustainable locations within the District, in accordance with the following minimum distribution: • 3,520 (2,500) dwellings will be provided at Market Harborough. • 1,440 (1,030) dwellings will be provided at Lutterworth; • 1,040 (740) dwellings will be provided at the Leicester urban fringe; • 880 (630) dwellings will be provided at Broughton Astley; • 1,120 (900) dwellings will be provided between the following Key Rural Centres: Fleckney, Kibworth and Great Glen • 220 (160) dwellings will be provided at the Key Centres of Ullesthorpe and Husbands Bosworth and Billesdon together with the selected rural villages identified at Core Strategy Policy 17. Note: the figures in parenthesis are for 2026 if this is the end date of the Core Strategy.</p>
3617/285	Bovis Homes	Great Glen should be a key rural centre and recognised as a location for growth beyond the existing commitment.	<p>Bovis Homes object to the omission of Great Glen from the list of Rural Centres in Policy 2(b) albeit the settlement has been included in the suggested change. Great Glen is recognised as a ‘Key’ Rural Centre which possesses six facilities and is situated on a public transport corridor. Although there may be an outstanding allocation (as stated at Core Strategy paragraph 6.60) this is not a sufficient reason to discount future potential growth at Great Glen taking into account the settlement’s suggested status as a ‘Key’ Rural Centre and the acknowledgment that some development could still occur. Further, what may emerge from the community engagement exercise is that the local residents may support growth if it would bring benefits. Such benefits could, for example, include additional open space provision in a settlement where there is the ‘most pronounced deficiency’ according to the Core Strategy; local employment opportunities to foster economic growth and additional residents to support the retail and community services. Although Bovis Homes possess an interest in land at Great Glen the company recognises that the Core Strategy is not the appropriate document for detailed and site specific representations to be submitted. However, as a matter of principle, Great Glen is a location which can contribute to meeting the housing needs of the District and there is scope to provide an urban extension which would not prejudice the landscape setting of the settlement, avoids floodplain and exacerbating any flooding problem and has scope to provide a development which would be of benefit to the community.</p>
3620/292	Lutterworth Town Council	The proposal is consistent with the objectives contained within the Built Environment section of the Lutterworth Town Plan 2010. Lutterworth should achieve the optimum population size to sustain a diverse economic prosperity whilst ensuring that the infrastructure keeps pace with the carefully planned development. No more than 500 dwellings must be provided otherwise development land would risk distorting Lutterworth’s spatial integrity.	
2050/303	William Davis Ltd	William Davis Ltd support the approach taken to the delivery of new housing in Policy 2. The allocation of housing numbers proposed in part (b) of the policy indicates a commitment from the council to locate new residential development in the most sustainable locations in the borough, in line with the national commitment to sustainable development contained in PPS1 and further	As indicated above William Davis Ltd support and consider the majority of Policy 2 to be sound. However we do not consider part (c) of the document to be sound for the reasons identified above. To ensure housing targets established in the borough are deliverable and for the council to maintain a 5

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		<p>detailed in PPS3. Market Harborough, Lutterworth, Broughton Astley and the Leicester Urban Fringe are all highly sustainable locations for residential development.</p> <p>We also support the approach taken in part (e) of Policy 2 which includes the requirement for the monitoring of housing land supply and the maintenance of a five years' supply of housing land. Such an approach is clearly consistent with the national planning policy commitment to delivery of housing land. We also welcome the acknowledgement that where the council has a deficiency in 5 year housing land supply it is the settlements identified in part (b) of the policy that will be expected to meet this shortfall. As identified above we consider these settlements to be the most sustainable locations in Harborough and welcome the commitment of the council to locate residential development in such locations.</p> <p>However we object to part (c) of the policy as we do not consider that the commitment to Brownfield land being used before Greenfield land to be a deliverable policy. As indicated in our response to Policy 1, we do not object to priority being given to Brownfield land as this is consistent with national planning policy in PPS3. However we object to the reference to Brownfield land being used 'before Greenfield land' as we do not consider that such an approach would deliver the housing targets identified in the plan over the relevant time period and would limit the council's ability to maintain a 5 year housing land supply in accordance with PPS3. As a consequence we do not view this element of the policy as consistent with national planning policy and would limit the effectiveness of the plan through the delivery of housing development.</p> <p>This view is supported by the findings of the council's SHLAA document which indicates a lack of deliverable PDL sites in the first 5 years of the plan period. A good example of this issue is in Lutterworth. Insight Planning Ltd have completed an 'Assessment of Deliverability of Land for Housing' in Lutterworth which considered the deliverability of PDL land in the settlement. Paragraph 69 of the assessment (attached to this representation) summarises the findings of the work by indicating that in Lutterworth "The analysis has shown that no PDL sites can be judged to be immediately deliverable". We consider this likely to be the case elsewhere in Harborough and supports our objection that PDL land should always be used before Greenfield land, as is indicated by Policy 2 (c). As a consequence we believe the text of the policy should be altered to allow the council to realistically meet housing targets in the district.</p>	<p>year housing land position we believe that Greenfield and Brownfield land needs to be delivered in tandem and that reference to Brownfield land being used before Greenfield land should be deleted from the policy. Consequently part (c) of policy 2 should be altered to read:</p> <p>"Priority being given to the use of Brownfield land for the provision of new dwellings"</p>
2054/318	Wheatcroft & Son	<p>In line with our representations to Policy 1 we do not consider that there is justification for the designation of Broughton Astley in the same settlement classification as Lutterworth. Broughton Astley is significantly smaller and has services and facilities, which are more similar to those found in the other Rural Centres. We therefore consider that it should be designated as a Rural Centre.</p> <p>In line with this we consider that Broughton Astley should not have its own housing target and that the 300 dwellings allocated to Broughton Astley should be combined with the 376 dwellings allocated to the Rural Centres. Focusing growth in only a few settlements would not allow sufficient flexibility, for instance for people to continue to live in the rural communities where they have grown up or to provide sufficient affordable housing in the right locations. Allowing growth to be evenly distributed will also contribute to the sustainability of all Rural Centres by providing a mix of residential and commercial development that will support each other and support other facilities and services within the Rural Centres. This would be inline with guidance in PPS3, which states that homes should be provided in a variety of locations and in a variety of tenures, in order to ensure that people can live within the communities they choose.</p>	<p>Broughton Astley should be re-designated as a Rural Centre and the housing targets for Broughton Astley and the Rural Centres should be combined in order to provide flexibility in the provision of housing across the district in line with guidance in PPS3.</p>

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2055/330	Leicestershire County Council	It is not clear what the difference is between “strategic housing needs” and the “accommodation needs of the District’s population”. The former could be interpreted that Harborough is providing for the housing needs of areas beyond its boundary, but the annual provision in the Regional Plan is 350 as against the DCLG trend of 522 (Appendix 2 of the Regional Plan). It is the case, however, that there is a history of migration from Leicester into Harborough, often into the more unsustainable rural area. The Regional Plan provision was set deliberately low to counter this historic trend.	Clarify the paragraph.
2055/331	Leicestershire County Council	Paragraph 5.4 could also refer to the extensive evidence base on which the Regional Plan’s housing target was based.	Insert a reference to the evidence base.
2055/332	Leicestershire County Council	The 500 dwellings proposed for Lutterworth is supported as it appears consistent with those sites identified as deliverable or potentially deliverable in the 2010 SHLAA Update.	
2055/333	Leicestershire County Council	No evidence has yet been produced to demonstrate that it is possible to deliver in practice a strategic development area of 1,000 dwellings to the North West of Market Harborough without causing a significant deterioration in travel and environmental conditions in the town. The transport work to date (undertaken by ARUP) has largely been at a broad level, and in the case of Market Harborough based on manual methods. Thus, the transportation impacts on the town of alternative options for housing growth and supporting infrastructure have not yet been considered in any detail. In turn, this has meant that there has been no comprehensive comparison of the merits or otherwise of alternative options, drawing together a broad range of indicators (e.g. environmental, flooding, transportation etc.) to determine whether any one option has clearer overall benefits for the town as a whole. The highway authority has not seen any evidence to suggest that a development of the scale and location proposed will be able to deliver, support and sustain a level of facilities and services that would genuinely encourage travel other than by private car and would minimise the need to travel external to the site. In respect of Policy 13 c), the highway authority is not aware of any evidence at this time to suggest whether the measures identified in this Policy are appropriate and what might be feasible/deliverable in practice, given the location and scale of the proposed strategic development area and the constrained nature of the town centre and its road layout. In addition, the Policy fails to talk about ‘smarter choice’ measures (e.g. personal travel planning, bus information and ticket provision), which in themselves can be costly to implement. The relatively detailed content of Policy 13 c) is at odds with the limited content of the Infrastructure Plan.	The Core Strategy should be underpinned by a more thoroughly developed transportation evidence base in respect of Market Harborough. In the absence of this evidence the District Council should review the balance of housing provision between Market Harborough and the Scaptoft/ Thurnby/ Bushby area.
2055/334	Leicestershire County Council	Para 2.26 refers to Broughton Astley in terms of a lack of employment provision and its reliance on Leicester for services, facilities and employment. Given this, it is questioned why it is afforded the status of ‘Key Centre’ – the same as the town of Lutterworth. If new housing is developed in places that fail to provide a range of supporting employment and other facilities, or which cannot be developed to do so, this will not help to reduce the impacts of travel on people’s lives and the environment.	Provide evidence of how provision of housing would promote additional services and facilities.
2055/335	Leicestershire County Council	Policy 2 (f) sets out minimum density requirements appears inconsistent with the revised PPS 3, published in June 2010, which removes the requirement for local planning authorities to set a minimum density target of 30 dwellings per hectare, instead encouraging a range of densities across the plan area (paragraph 47).	Whilst the Policy indicates that a flexible approach to density may be taken, it may be more appropriate for density to be judged on a site-by-site basis.
2055/336	Leicestershire County Council	Whilst the significant shift in emphasis from current commitments in the Rural Centres and Rural Villages to future provision in Lutterworth and Broughton Astley is welcomed, the paragraph 5.9 appears to indicate that future provision will be similar to that in the past.	Highlight this significant change in the text.

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2055/337	Leicestershire County Council	<p>No evidence has yet been produced to demonstrate that it is possible to deliver in practice a strategic development area of 1,000 dwellings to the North West of Market Harborough without causing a significant deterioration in travel and environmental conditions in the town. The transport work to date (undertaken by ARUP) has largely been at a broad level, and in the case of Market Harborough based on manual methods. Thus, the transportation impacts on the town of alternative options for housing growth and supporting infrastructure have not yet been considered in any detail. In turn, this has meant that there has been no comprehensive comparison of the merits or otherwise of alternative options, drawing together a broad range of indicators (e.g. environmental, flooding, transportation etc.) to determine whether any one option has clearer overall benefits for the town as a whole. The highway authority has not seen any evidence to suggest that a development of the scale and location proposed will be able to deliver, support and sustain a level of facilities and services that would genuinely encourage travel other than by private car and would minimise the need to travel external to the site.</p> <p>In respect of Policy 13 c), the highway authority is not aware of any evidence at this time to suggest whether the measures identified in this Policy are appropriate and what might be feasible/deliverable in practice, given the location and scale of the proposed strategic development area and the constrained nature of the town centre and its road layout. In addition, the Policy fails to talk about 'smarter choice' measures (e.g. personal travel planning, bus information and ticket provision), which in themselves can be costly to implement.</p> <p>The relatively detailed content of Policy 13 c) is at odds with the limited content of the Infrastructure Plan.</p>	The Core Strategy should be underpinned by a more thoroughly developed transportation evidence base in respect of Market Harborough. In the absence of this evidence the District Council should review the balance of housing provision between Market Harborough and the Scraptoft/ Thurnby/ Bushby area.
2055/338	Leicestershire County Council	<p>Para 5.17 states: "The development area [north west of Market Harborough] will be expected to deliver a number of basic everyday local services and facilities for its residents, together with significant investment in the provision of cycling / walking routes and public transport, in order to provide attractive alternatives to use of the private car." This seems to be contradicted by para 5.46, which states: "Owing to physical constraints within the historic urban areas of the District, the relatively limited level of development proposed and lack of expected public funding sources, the development strategy contained in this document does not rely on significant need for additional transport infrastructure but continues to direct most development into areas which already have capacity to offer transport choice for local journeys and make best use of existing infrastructure."</p> <p>The beginning of Policy 5 repeats the same message as para 5.46. In principle, making best use of existing infrastructure is to be supported. But, in respect of Market Harborough, this apparent contradiction adds to the highway authority's concerns about how it will be possible to deliver the strategic development area of the scale and location proposed without significant adverse travel impacts.</p>	Amend text so that it is consistent. In respect of Market Harborough, it is likely that significant infrastructure investment will be required wherever the strategic development area is proposed.
2008/37	Blaby District Council	<p>Policy 2 – Delivering New Housing / Policy 16 – Broughton Astley</p> <p>Blaby District Council is not objecting to Broughton Astley being able to accommodate about 300 dwellings over the plan period as it is recognised that this could be beneficial to the surrounding settlements (including some within the administrative boundary of Blaby District, ie, Croft, Cosby and Sapcote etc). The fact that housing growth in Broughton Astley will at the same time seek to encourage additional retail and service provision, could bring benefits to nearby communities in Blaby District, therefore potentially reducing journey distances to access services.</p> <p>With regard to an additional 300 dwellings over the plan period at Broughton Astley and the traffic implications this may have, the relevant parts of the 'Oadby and Wigston Borough Council</p>	

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		<p>and Harborough District Council – Assessment of Highways and Transport Implications’ have been considered. Blaby District Council has concerns about the congestion around the B4114 approach to Soar Valley Way, which was highlighted in this document, and it was accepted that this was likely to worsen, particularly so, if significant development is allocated in Broughton Astley.</p> <p>Blaby District Council also has concerns about the impact of development in Broughton Astley and the additional traffic it will generate on the junction of the B581 (Coventry Road) and the B4114. Again, the relevant parts of the Transport Assessment were referred to, and even though there is expected to be some impact on the junction, the TA concludes that this will be fairly limited, and there is not thought to be any need for mitigation works to offset this.</p> <p>Blaby District Council does not feel that the proposed level of development at Broughton Astley is sufficiently significant to object to on traffic impact grounds. However, Blaby District Council requests that Harborough District Council, when considering planning applications for development at Broughton Astley, ensures that adequate funding is secured from the developers in terms of mitigating any impacts on the local highway network, particularly impacts on the B4114.</p> <p>It is considered that this policy is both legally compliant and sound (as long as the funding for any identified, necessary transport improvements to support the growth in Broughton Astley can be secured and schemes delivered)</p>	
3678/378	Mr N Lane	<p>The provision of an additional 300 dwellings at Broughton Astley, as set out in point b) of Policy 2, is supported. In identifying suitable locations to accommodate the additional growth in Broughton Astley it is considered that sites such as Glebe Farm (to the south west of the village), which is sustainable in its nature and has direct links to local services and facilities, should be allocated for development in the Allocations DPD. More detailed comments pertaining to the location of housing development in Broughton Astley is set out in response to Policy 16: Broughton Astley.</p>	<p>In identifying suitable locations to accommodate the additional growth in Broughton Astley it is considered that sites such as Glebe Farm (to the south west of the village), which is sustainable in its nature and has direct links to local services and facilities, should be allocated for development in the Allocations DPD. More detailed comments pertaining to the location of housing development in Broughton Astley is set out in response to Policy 16: Broughton Astley.</p>
2056/382	Trustees of the Bowden Settlement	<p>As referred to in response to Policy 1: Spatial Strategy for Harborough, the Trustees object to identification of a strategic development area of approximately 1,000 dwellings to the north west of Market Harborough. The identification of this parcel of land for the majority of the District’s growth, as reiterated in Policy 2, Point b), is considered unsound following the Council’s failure to undertake a full assessment of alternative locations for growth in Market Harborough. The Trustees detailed objections to the strategic development area to the north west of Market Harborough are set out in response to Policy 13: Market Harborough. The Trustees of the Bowden Settlement are also concerned that Great Bowden has not been identified as a settlement where its community can be developed through the provision of new dwellings. The close proximity of Great Bowden to the services and facilities on offer in Market Harborough is recognised however, it is considered that a small amount of additional development in Great Bowden should be allowed in order to sustain its own services and facilities in the longer term. It is therefore considered that the allocation of sites for additional residential development in sustainable locations within the District, as set out in Point b) of Policy 2, should make provision for a small amount of additional development in Great Bowden. In so doing, land to the south west of Great Bowden, south of Top Yard Farm, should be allocated for development in the Allocations Development Plan Document.</p>	

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2057/385	AMOS	As referred to in response to Policy 1: Spatial Strategy for Harborough, AMOS object to identification of a strategic development area of approximately 1,000 dwellings to the north west of Market Harborough. The identification of this parcel of land for the majority of the District's growth, as reiterated in Policy 2, Point b), is considered unsound following the Council's failure to undertake an assessment of alternative locations for growth in Market Harborough. AMOS's detailed objections to the strategic development area to the north west of Market Harborough are set out in response to Policy 13: Market Harborough.	
2058/388	Constable Maxwell	The provision of 376 dwellings to be provided between the Rural Centres is supported. More detailed representations relating to the location of housing development are set out in response to Policy 17: Countryside, Rural Centres and Rural Villages. It is however considered that the limited housing provision for the Rural Centres currently to be distributed between Fleckney, Billesdon, Ullesthorpe and Husbands Bosworth should be split amongst all of the Rural Centres identified in Policy 1, including Great Glen and Kibworth.	
2018/76	Thurnby and Bushby Society	Location of new housing: Clause (c) in the Policy is not enough to protect residential garden land (recently declared Greenfield land), particularly if there is a shortfall in the 5-year housing land supply, because the revised PPS3 only removes the presumption in favour of development on garden land.	Policy required specifically saying building will not normally be allowed on residential garden land.
2059/391	Mr S Nanuwa	Concern is raised at the proposal to provide 376 dwellings between the Rural Centres of Fleckney, Billesdon, Ullesthorpe and Husbands Bosworth. It is considered that the limited housing provision for the Rural Centres should be split amongst all of the Rural Centres identified in Policy 1, including Great Glen and Kibworth. More detailed representations relating to this issue are set out in response to Policy 17: Countryside, Rural Centres and Rural Villages.	
2060/394	Mrs J Eastwood	The provision of 376 dwellings to be provided between the Rural Centres is supported. More detailed representations relating to the location of housing development are set out in response to Policy 17: Countryside, Rural Centres and Rural Villages. It is however considered that the limited housing provision for the Rural Centres currently to be distributed between Fleckney, Billesdon, Ullesthorpe and Husbands Bosworth should be split amongst all of the Rural Centres identified in Policy 1, including Great Glen and Kibworth.	
2061/397	Pilkington Trust	As referred to in response to Policy 1: Spatial Strategy for Harborough, the Trust object to identification of a strategic development area of approximately 1,000 dwellings to the north west of Market Harborough. The identification of this parcel of land for the majority of the District's growth, as reiterated in Policy 2, Point b), is considered unsound following the Council's failure to undertake an assessment of alternative locations for growth in Market Harborough. The Trust's detailed objections to the strategic development area to the north west of Market Harborough are set out in response to Policy 13: Market Harborough.	
3657/413	Jelson	Policy 2 (and the trajectory at Appendix 1) provide for exactly the amount of housing required over the plan period (7,000) and no more. It is considered that this makes the plan inherently inflexible and generates very significant concern that the Core Strategy targets will not be met. There is no contingency set out to ensure housing targets are delivered, either through deliberate overprovision, or by setting the targets for some or all of the District as minimal. It is also clear that the final housing targets are driven by the arbitrary splitting of the 7,000 target across the District, rather than any assessment of need and capacity in each part of the District. This is best exemplified in respect of the allocation for the Leicester Urban Fringe which is restricted to 350 despite being acknowledged as a highly sustainable location and despite the SHLAA indicating	

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		<p>capacity for 1593 dwellings (see paragraph 6.38). It is clear that th is area has the capacity to sustainably accommodate more than 350 houses and that on this basis the target for this area should be set as a minimum with the final total to be determined through the allocations DPD following the conclusion of any additional work in relation to transport and the capacity of the Green Wedges / Areas of Separation for change. At present the core strategy artificially constrains development in sustainable areas and demonstrates a complete absence of flexibility. The residual approach to development in all Rural Centres (i. e. the 376 left over') also points to a distribution that is not based on any robust assessment of need and capacity.</p>	
2064/420	Persimmon Homes North Midlands	<p>Policy 2 – Overall Approach to scale and distribution (explained by paragraph 5.7). The development plan for the District currently comprises the saved policies of the 2001 Local Plan and the East Midlands Regional Plan and will, in time, include the Core Strategy. Following the publication of the draft localism bill which proposes the abolition of Regional Strategies there is some uncertainty over the future status of the Regional Plan.</p> <p>The Government has stated its view that, in the absence of Regional Strategies, local authorities may rely upon the housing evidence prepared for Regional Strategies and the totals submitted to the Examination in Public as a basis for their 'locally derived figures'. This is the approach that Harborough has taken. In this context the status of the Regional Strategy is not critically important to the District's overall housing requirement.</p> <p>However, to rely upon the overall housing requirements of the Regional Strategy but discard the overall distribution strategy of 'urban concentration' upon which it is based represents an incoherent approach to meeting housing need and demand, and is likely to result in the under-provision of housing at the larger settlements within the district, particularly Market Harborough. Indeed, Policy Three Cities SRS 3 of the Regional Plan requires that of the 7,000 dwellings proposed in the period 2006-2026, 40 dwellings per annum should be within or adjoining the Leicester Principal Urban Area and in the rest of the district mainly at Market Harborough. To significantly depart from this position risks that the strategy will not be found to be sound as it has not been properly justified. The publication Core Strategy's proposed distribution results in less than half the provision of the rest of the district being located at Market Harborough.</p>	<p>To achieve soundness, the housing requirement of the plan set out at Policy 1(a) needs to be revised to take account of a time horizon to 2028. On the basis of the Council's adopted position at July 2010, this would require a further 700 dwellings across the plan period 2006-2028:</p> <p>Nos Housing Requirement 2006-2028 - 7,700 Completions 2006-2010 - 1,841 Residual Requirement to 2028 - 5,859 Proposed Changes: The District's total housing requirement of 7,000 7,700 dwellings will be provided in a sustainable manner, by:</p> <p>a) The development of housing sites with planning permission. Any shortfall in the delivery of current commitments will be made up by the granting of planning permissions for the settlement concerned.</p> <p>b) The allocation and development of sites for additional residential development in sustainable locations within the District, in accordance with the following distribution:</p> <ul style="list-style-type: none"> •1,200 2,100 dwellings will be provided at Market Harborough. This will include a strategic development area of approximately 1,000 1,500 dwellings immediately to the west and north west of Market Harborough; •500 350 dwellings will be provided at Lutterworth; •350 485 dwellings will be provided at the Leicester urban fringe; •300 dwellings will be provided at Broughton Astley •376 495 dwellings will be provided between the following rural centres: Fleckney, Billesdon, Ullesthorpe and Husbands Bosworth, together with the selected rural villages identified at Core Strategy Policy 17. <p>Table 3 to be amended as follows:</p> <p>Total Built Leicester Urban Fringe Market Harb. Lutterworth Broughton Astley Rural Centres Rural Villages A Total remaining need to 2028 7,700 B Total Built 1,841 208 798 84 50 285 416 C Total Committed 2,368 210 935 47 0 950 226</p>

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			D 10% Non Implementation -238 -21 -94 -5 0 -95 -23 E Remaining to be found (A-B-C-D) 3,729 F Planned Growth (2006-2028) 3,730 485 2,100 (inc 1,500 to w of M Harb) 350 300 495 G Total Built, committed and planned (B+C+D+E) 7,701 882 (11%) 3,739 (49%) 476 (6%) 350 (5%) 2,254 (29%)
2065/425	Trustees of the Bushby Settlement c/o Mather Jamie	<p>The development plan for the District currently comprises the saved policies of the 2001 Local Plan and the East Midlands Regional Plan and will, in time, include the Core Strategy. Following the publication of the draft localism bill which proposes the abolition of Regional Strategies there is some uncertainty over the future status of the Regional Plan.</p> <p>The Government has stated its view that, in the absence of Regional Strategies, local authorities may rely upon the housing evidence prepared for Regional Strategies and the totals submitted to the Examination in Public as a basis for their 'locally derived figures'. This is the approach that Harborough District Council has taken. In this context the status of the Regional Strategy is not critically important to the District's overall housing requirement.</p> <p>However, to rely upon the overall housing requirements of the Regional Strategy but discard the overall distribution strategy of 'urban concentration' upon which it is based represents an incoherent approach to meeting housing need and demand, and is likely to result in the under-provision of housing at the larger settlements within the district, particularly Market Harborough. Indeed, Policy Three Cities SRS 3 of the Regional Plan requires that of the 7,000 dwellings proposed in the period 2006-2026, 40 dwellings per annum should be within or adjoining the Leicester Principal Urban Area (PUA) and in the rest of the district mainly at Market Harborough. To significantly depart from this position risks that the strategy will not be found to be sound as it has not been properly justified. The publication Core Strategy's proposed distribution results in less than half the provision of the rest of the district being located at Market Harborough.</p>	<p>To achieve soundness, the housing requirement of the plan set out at Policy 2 needs to be revised to take account of a time horizon to 2028. On the basis of the Council's adopted position at July 2010, this would require a further 700 dwellings across the plan period 2006-2028:</p> <p><input type="checkbox"/> Nos Housing Requirement 2006-2028 <input type="checkbox"/> 7,700 Completions 2006-2010 <input type="checkbox"/> 1,841 Residual Requirement to 2028 <input type="checkbox"/> 5,859</p>
2066/432	Davidsons Group Ltd	<p>Policy 2 – Overall Approach to scale and distribution (explained by paragraph 5.7)</p> <p>The development plan for the District currently comprises the saved policies of the 2001 Local Plan and the East Midlands Regional Plan and will, in time, include the Core Strategy. Following the publication of the draft localism bill which proposes the abolition of Regional Strategies there is some uncertainty over the future status of the Regional Plan.</p> <p>The Government has stated its view that, in the absence of Regional Strategies, local authorities may rely upon the housing evidence prepared for Regional Strategies and the totals submitted to the Examination in Public as a basis for their 'locally derived figures'. This is the approach that Harborough has taken. In this context the status of the Regional Strategy is not critically important to the District's overall housing requirement.</p> <p>However, to rely upon the overall housing requirements of the Regional Strategy but discard the overall distribution strategy of 'urban concentration' upon which it is based represents an incoherent approach to meeting housing need and demand, and is likely to result in the under-provision of housing at the larger settlements within the district, particularly Market Harborough. Indeed, Policy Three Cities SRS 3 of the Regional Plan requires that of the 7,000 dwellings proposed in the period 2006-2026, 40 dwellings per annum should be within or adjoining the Leicester Principal Urban Area and in the rest of the district mainly at Market Harborough. To</p>	<p>Policy 2d)</p> <p>Delete part d) as boundaries must be reviewed as part of the Allocations DPD preparation.</p> <p>Policy 2f)</p> <p>To achieve soundness this element of the policy needs to be supported by evidence to demonstrate that the type of housing likely to be required throughout the district can be provided at the densities sought.</p> <p>Proposed Changes:</p> <p>The District's total housing requirement of 7,000 7,700 dwellings will be provided in a sustainable manner, by:</p> <p>a) <input type="checkbox"/> The development of housing sites with planning permission. Any shortfall in the delivery of current commitments will be made up by the granting of planning permissions for the settlement concerned.</p>

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		significantly depart from this position risks that the strategy will not be found to be sound as it has not been properly justified. The publication Core Strategy's proposed distribution results in less than half the provision of the rest of the district being located at Market Harborough.	<p>b) The allocation and development of sites for additional residential development in sustainable locations within the District, in accordance with the following distribution:</p> <ul style="list-style-type: none"> 1,200 2,100 dwellings will be provided at Market Harborough. This will include a strategic development area of approximately 1,000 1,500 dwellings immediately to the west and north west of Market Harborough; 500 350 dwellings will be provided at Lutterworth; 350 485 dwellings will be provided at the Leicester urban fringe; 300 dwellings will be provided at Broughton Astley 376 495 dwellings will be provided between the following rural centres: Fleckney, Billesdon, Ullesthorpe and Husbands Bosworth, together with the selected rural villages identified at Core Strategy Policy 17. <p>Table 3 to be amended as follows:</p> <p> Total Built Leicester Urban Fringe Market Harb. Lutterworth Broughton Astley Rural Centres Rural Villages A Total remaining need to 2028 7,700 B Total Built 1,841 208 798 84 50 285 416 C Total Committed 2,368 210 935 47 0 950 226 D 10% Non Implementation -238 -21 -94 -5 0 -95 -23 E Remaining to be found (A-B-C-D) 3,729 F Planned Growth (2006-2028) 3,730 485 2,100 (inc 1,500 to w of M Harb) 350 300 495 G Total Built, committed and planned (B+C+D+E) 7,701 882 (11%) 3,739 (49%) 476 (6%) 350 (5%) 2,254 (29%) </p>
2067/436	Davidsons Group Ltd	<p>Policy 2 confirms that the total housing requirement for Harborough District will be 7,000 dwellings between 2006 and 2026. Taking into account completions and commitments, this leaves a residual amount of 2,726 dwellings to be allocated.</p> <p>Policy 2a) states that "any shortfall in the delivery of current commitments will be made up by the granting of planning permission for the settlement concerned." Firstly, additional supply within any settlement clearly relies upon the availability of sites and the willingness of developers to submit planning applications. The policy does not explain where this source of supply will come from. Secondly, in the case of the Rural Centres, where current commitments fail to come forward, it should be possible to meet the district's housing requirements at suitable sites in other Rural Centres. The wording of this policy is therefore too restrictive and is unsound on the basis that it is not effective.</p>	To achieve soundness it is considered that it would be prudent to include a 10% non-implementation allowance on commitments. Commitments at 2010 are 2,433. In total a further 238 dwellings should be provided for across the District. It should also be made clear that Rural Centre housing commitments that fail to come forward can be reallocated to suitable sites in other Rural Centres.
2073/449	Leicester Diocesan Board of Finance/Carr/Bowie/Murmann/Joh	<p>Following our submission in relation to the Spatial Strategy, Policy 2 : Delivering New housing needs to be revisited to provide new homes in locations which can more easily fulfil the Strategic Objectives and resolve Key Issues.</p> <p>Our contention is that Great Glen is particularly better placed to meet the above requirements, as previously outlined. Fleckney, for example, has poor transport links, and is not as well related to</p>	The Policy should be amended to insert Great Glen as a location for 300 dwellings; and reduce the allocation for Fleckney, Billesdon, Ullesthorpe and Husbands Bosworth.

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2074/455	Mrs P Hays	<p>serve a wider rural area as Great Glen. Billesdon, Ulesthorne and Husbands Bosworth are much smaller settlements which may be capable of a limited amount of new housing but not at the scale which can be accommodated at Great Glen, with its prime position to fulfil Strategic Objectives, whilst improving and making best use of social, economic and physical infrastructure.</p> <p>Policy 2 Delivering New Housing sets out at 2b) the distribution across the District of new housing. We broadly support the distinction made between different areas/locations ie main towns, Leicester Fringe and rural centres/rural area. However we do not consider that distribution of new housing to these locations reflects the current distribution of population and where likely demand for housing will be in the future. Moreover this policy has been shaped by the East Midlands RSS which seeks to locate new development within .and adjoining the urban areas at the expense of the rural areas, where in the case of Harborough District is where most of the population lives. The RSS is to be abolished.</p> <p>At para 6.60 it states that 27% of the total housing requirement of 7,000 dwellings 2006-26 will be built in the Rural Centres and Rural Villages. However, at para 2.6 the CS states that 57% of the population live in large villages and other rural villages. At the same time the Strategic Housing Market Assessment (SHMA) Report has identified a huge demand for affordable housing in the rural areas due to supply shortages and high demand for homes which has forced prices up. The demographics of the rural area with its high proportion of older people clearly suggests that there is a need to rejuvenate the population by encouraging younger families to establish homes in these settlements. There is also pressure to close/reduce rural services, which an increasing population can address by increasing spending power and introducing new ideas and energy. Thus, in order to create a better balanced population distribution and to better meet the needs of the rural population, then the number of houses to be provided in the Rural Centres of Fleckney, Billesdon, Ulesthorne, Husbands Bosworth and other selected rural villages should be increased. Such a policy would also resonate better with PPS7 Sustainable Development in Rural Areas.</p>	<p>We propose that the first part of Policy 2 should be amended along the following lines: The District's total housing requirement of around 9,000 dwellings will be distributed to the main towns, Leicester Urban Fringe settlements the Rural Centre and selected rural villages to broadly reflect the existing population distribution as follows:</p> <ul style="list-style-type: none"> • Market Harborough and Lutterworth - 37% (approx 3,330 dwellings): • Leicester Fringe Settlements - 6% (approx 540 dwellings): • Rural Centres (Fleckney, Billesdon, Ulesthorne, Husbands Bosworth and other selected rural villages) -57% (approx 5,130 dwellings) . <p>Actual additional allocations in these settlements will need to reflect completions to date and also existing commitments estimated to total 4,274, thus leaving the CS to provide for additional allocations totalling 4,726 (based on a total provision of 9,000 dwellings. Based on the above % breakdown this will require additional allocations as follows:</p> <ul style="list-style-type: none"> • . Market Harborough and Lutterworth - approx 1,748 dwellings); • Leicester Fringe Settlements - approx 284 dwellings); • Rural Centres (Fleckney, Billesdon, Ulesthorne, Husbands Bosworth and other selected rural villages) - approx 2,694 dwellings)
2029/464	Davidsons Group	<p>It is considered that the Core Strategy is not legally compliant and is unsound because the planned time horizon for the document will be less than 15 years from the date of adoption to the end of the monitoring year 2026. This fails to conform to national planning policy set out at paragraph 4.13 of PPS12.</p> <p>Paragraph 1.8 and Table 1 of the document sets out that it is expected that the expected adoption date is late 2011. In terms of housing delivery this is well into the monitoring year 2011/2012. A 15 year time horizon would take the Core Strategy into at least 2027.</p> <p>The time horizon has particular significance for the delivery of housing and therefore Policy 2. PPS3 paragraph 53 requires that “local planning authorities should set out in their Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption.” Given that the proposed Core Strategy does not actually allocate any specific sites to deliver housing, the time horizon of the Core Strategy should take account of the time required to prepare and adopt subsequent documents that will perform this role. In the context of the Harborough Local Development Scheme, the relevant document is the Allocations Development Plan Document and accompanying proposals map, together with a Community Infrastructure Levy Charging Schedule. An horizon of 2026 clearly does not allow sufficient time for the preparation and</p>	<p>The Core Strategy should work to a time horizon beyond 2026. It is logical, in the absence of a review of a Regional Strategy, to work to a period which reflects the most recent household population projections.</p> <p>A time horizon of 2028 reflects a twenty year period from the base year of the most recently published national household projections (2008), and gives the Council until April 2013 to adopt the necessary Development Plan Documents to allow a continuous supply of housing for a 15 year period in accordance with PPS3. Indeed, this timescale accords with the Council’s most recent draft Local Development Scheme (reported to Executive Committee December 20th 2010).</p> <p>The additional 2 year period and the associated additional housing requirements are not considered to be so significant to require substantial review of the Core Strategy preparation and would entail a scale of additional development which would not be so significant to require fresh assessment of its impacts.</p> <p>Housing Requirement</p> <p>To achieve soundness, the housing requirement of the plan set out at Policy</p>

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		<p>adoption of these documents, and therefore the proposed time horizon of the Core Strategy also fails the test of soundness on account of its lack of conformity to national planning policy. Table 2 and the first sentence of Policy 2 therefore do not accord with PPS3 advice.</p>	<p>2 needs to be revised to take account of a time horizon to 2028. On the basis of the Council's adopted position at July 2010, this would require a further 700 dwellings across the plan period 2006-2028:</p> <p>□ Nos Housing Requirement □ 2006-2028 □ 7,700 Completions □ □ □ 2006-2010 □ 1,841 Residual Requirement to □ 2028 □ □ 5,859</p>
2029/469	Davidsons Group	<p>Policy 2(b) Whilst a specific requirement for Leicester Urban fringe is supported, it is considered that the amount of development planned for within this area is not justified because it is not the most appropriate strategy when considered against the reasonable alternatives. The provision for the Leicester urban edge does not accord with Policy 13A of the East Midlands Regional Plan, which requires at least 40 dwellings per annum to be provided within or adjoining the Leicester PUA. This regional policy is based founded on a robust and credible evidence base and evidence and the Council's continued use of the overall RSS housing requirement implies this. As noted above, to then depart from the RSS distribution strategy for the PUA risks making the Core Strategy unsound.</p> <p>The SHLAA which forms part of the Council's evidence base for the Core Strategy indicates significant capacity in the Leicester urban fringe area of 1,593 dwellings. Furthermore, the transport related work undertaken considers a higher number of dwellings being accommodated in the PUA than was finally adopted in the RSS and identifies no "show stoppers" to 880 dwellings in this urban location. There does not therefore appear to be any sound basis for the Council to allocate fewer dwellings to the Leicester urban fringe than required in the RSS policy or identified as acceptable through the evidence base.</p>	<p>Policy 2(b) To achieve soundness it is considered that the requirement for the Leicester urban edge should be increased in line with the minimum requirements of the East Midlands Regional Plan. Total Provision over the plan period 2006-2028 needs to be increased to 882 dwellings therefore, leaving sites for an additional 485 dwellings to be identified. Table 3 should be amended accordingly.</p>
2029/473	Davidsons Group	<p>Policy 2(a) It is considered that the second sentence of this part of the Policy is not sound as it is not effective. Additional supply within any settlement clearly relies upon the availability of sites and the willingness of landowners and developers to submit planning applications. This statement does not explain where this source of supply will come from.</p>	<p>Policy 2(a) To achieve soundness it is considered that it would be prudent to include a 10% non-implementation allowance on commitments. Commitments at 2010 are 2,433. In total a further 238 dwellings should be provided for across the District.</p>
2029/477	Davidsons Group	<p>Policy 2(d) It is considered that this part of the policy is not effective and is not justified by evidence. The limits to development as defined in the 2001 Local Plan were reflective of the development requirements of that Plan and the material circumstances at that time. The merits for the particular limits to development around settlements needs to be reviewed and updated. In this context it is clear that the requirements of the rest of Policy 2 will necessitate amendments to these boundaries and therefore the material weight which the limits to development are given in the determination of future planning applications will be diminished.</p> <p>The recent decision of an Inspector in respect of an appeal against the refusal of planning permission at London Road, Markfield (Hinckley and Bosworth Borough ref APP/K2420/A/10/2125649) supported this view.</p>	
2029/478	Davidsons Group	<p>Policy 2(f) The net minimum density requirements set out in Policy 2(f) are inconsistent with guidance published in PPS3 (June 2010) which no longer seeks to set a national minimum requirement. It is unclear which parts of the evidence base support these broad minimum requirements across the district, particularly the 30dph required outside of the Market Harborough and Lutterworth central areas. In this respect the policy is not justified, effective or in accordance with national policy. Whilst the policy does seek to be flexible, it would be more</p>	<p>Policy 2(f) To achieve soundness this element of the policy needs to be supported by evidence to demonstrate that the type of housing likely to be required throughout the district can be provided at the densities sought. Given the rural nature of much of the District, landscape considerations are often of paramount importance in relation to new housing proposals. The policy should reflect the flexibility of the revised PPS3 in this respect, in</p>

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
		effective were it to be significantly more refined, reflecting the guidance given in paragraph 46 and 47 of PPS3.	order to allow lower density development where landscape considerations indicate.
2081/496	Bitteswell Parish Council	<p>The statements under this Policy record the decision to retain the Regional Strategy target of providing 7000 dwellings within the Plan Period. This value and other housing data, as at 31 March 2010, are provided in Table 2.</p> <p>From these data the following may be determined: The overall number of 7000 equates to an average dwellings per annum (adpa) of 350; The total built to March 2010 is 1841; The outstanding commitments and allocations are 2433, as at 31 March 2010; This leaves 2726 dwellings to be provided by 2026. As there are 16 years of the Plan Period remaining, to satisfy the programme requires an adpa of about 170.</p> <p>It is important to note that in the four years since 2006 the actual adpa has been over 460, or an annual overprovision of some 31%. The magnitude of the overprovision is evident from the Housing Trajectory Schedule at Appendix 1 of the Core Strategy. It is equally clear from the same Schedule that a material positive divergence from the planned programme for the provision of dwellings will continue to be evident during the balance of the Plan Period. In the context of programme management it is relevant to note that in each of the nine years from 1996 to 2005, the previous plan period, there was an overprovision of some 26% against the planned need for dwellings. Thus, it would seem reasonable to conclude that the District Council has failed significantly, and it would seem, systematically, in keeping to the planned requirement for housing. 'This may indicate a need for review by the Executive of the management of the District Council's housing programme.</p>	
2081/497	Bitteswell Parish Council	On the basis of the figures stated in Table 2, the number needed to complete the provision of dwellings in, the Plan Period is 2726. Not 'at least 2726', as stated in this paragraph. If targets are not determinate they cease to be meaningful and frustrate intelligent monitoring. Therefore, the words 'at least' in the second line of this paragraph should be excised.	
2081/498	Bitteswell Parish Council		Paragraph 5.6 (c) expresses the priority to be accorded to previously developed land (PDL). It would be helpful to record here the national target to build 60% of new dwellings on PDL.
2081/499	Bitteswell Parish Council	The statement in this paragraph regarding the consideration of planning applications on land adjacent to existing Limits to Development is clearly a matter of fundamental concern. If development is to be allowed on land outside the existing Limits to Development then the whole purpose of the policy of Limits to Development would be vitiated; it would compromise the 'certainty and predictability' that the Plan-Led system is intended to provide. It is recommended that this paragraph is subjected to critical review.	
2081/500	Bitteswell Parish Council	It is noted that Row C and Row F of this Table do not appear to tally.	
2081/501	Bitteswell Parish Council	The Chart at Table 4 not only demonstrates the historic overprovision of dwellings in the District, as noted earlier, but also that the future projected rate of provision is planned to do so for eight of the remaining years to the end of the Plan Period.	

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2081/502	Bitteswell Parish Council	This paragraph discusses the need for dwellings in the next 5 years. In view of the substantial overprovision of dwellings since the commencement of the Plan Period, it is not evident why there is need to develop any new sites in the next 5 years. Indeed, as the Core Strategy illustrates, the cumulative provision until 2016 exceeds the corresponding planned requirement by 369 dwellings.	
2081/503	Bitteswell Parish Council	Although the historic utilization by the District Council of Previously Developed Land (PDL), as shown in Table 5, has been exemplary, it appears that future use will fall substantially short of the national target of at least 60%. Taking account of this forecast outturn and the historic and projected overprovision of dwellings in the Harborough District, it would seem appropriate to re-examine the justification of the annual average rate of 350 dwellings. It would also be apposite to positively reinforce item (c) of Policy 2, possibly, by according explicit preference to planning applications for development on PDL.	
2081/504	Bitteswell Parish Council	Table 6, which derives from the SHLAA study, presents a pessimistic projection (<9%) of the contribution to be made from dwellings constructed on PDL. This appears due to the total number in the Table bearing no relationship to the actual requirement for dwellings. If the stated total was normalised to take account of the planned requirement to the end of the Plan Period, and assuming that all of the PDL could be utilized, a more realistic value of the contribution from PDL would emerge and would be in the region of 30%. However, it should be recognized that that some 16 years of the Plan Period remain during which time the abundance of PDL may significantly increase, for example, by the transfer of HGV generating commercial operations from along the A426 to the south of Lutterworth. In these circumstances the action of the District Council could be regarded as less than prudent were it to commit to the use of greenfield land prematurely in the Plan Period.	
2065/542	Trustees of the Bushby Settlement c/o Mather Jamie	<p>It is considered that the Core Strategy is not legally compliant and is unsound because the planned time horizon for the document will be less than 15 years from the date of adoption to the end of the monitoring year 2026. This fails to conform to national planning policy set out at paragraph 4.13 of PPS12.</p> <p>Paragraph 1.8 and Table 1 of the document sets out that it is expected that the expected adoption date is late 2011. In terms of housing delivery this is well into the monitoring year 2011/2012. A 15 year time horizon would take the Core Strategy into at least 2027.</p> <p>The time horizon has particular significance for the delivery of housing and therefore Policy 2. PPS3 paragraph 53 requires that “local planning authorities should set out in their Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption.” Given that the proposed Core Strategy does not actually allocate any specific sites to deliver housing, the time horizon of the Core Strategy should take account of the time required to prepare and adopt subsequent documents that will perform this role. In the context of the Harborough Local Development Scheme, the relevant document is the Allocations Development Plan Document and accompanying proposals map, together with a Community Infrastructure Levy Charging Schedule. An horizon of 2026 clearly does not allow sufficient time for the preparation and adoption of these documents, and therefore the proposed time horizon of the Core Strategy also fails the test of soundness on account of its lack of conformity to national planning policy. Table 2 and the first sentence of Policy 2 therefore do not accord with PPS3 advice.</p>	<p>The Core Strategy should work to a time horizon beyond 2026. It is logical, in the absence of a review of a Regional Strategy, to work to a period which reflects the most recent household population projections.</p> <p>A time horizon of 2028 reflects a twenty year period from the base year of the most recently published national household projections (2008), and gives the Council until April 2013 to adopt the necessary Development Plan Documents to allow a continuous supply of housing for a 15 year period in accordance with PPS3. Indeed, this timescale accords with the Council’s most recent draft Local Development Scheme (reported to Executive Committee December 20th 2010).</p> <p>The additional 2 year period and the associated additional housing requirements are not considered to be so significant to require substantial review of the Core Strategy preparation and would entail a scale of additional development which would not be so significant to require fresh assessment of its impacts.</p>

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2065/543	Trustees of the Bushby Settlement c/o Mather Jamie	It is considered that the second sentence of this part of the Policy is not sound as it is not effective. Additional supply within any settlement clearly relies upon the availability of sites and the willingness of landowners and developers to submit planning applications. This statement does not explain where this source of supply will come from.	To achieve soundness it is considered that it would be prudent to include a 10% non-implementation allowance on commitments. Commitments at 2010 are 2,433. In total a further 238 dwellings should be provided for across the District.
2065/544	Trustees of the Bushby Settlement c/o Mather Jamie	<p>Whilst a specific requirement for Leicester Urban fringe is supported, it is considered that the amount of development planned for within this area is not justified because it is not the most appropriate strategy when considered against the reasonable alternatives. The provision for the Leicester urban edge does not accord with Policy 13A of the East Midlands Regional Plan, which requires at least 40 dwellings per annum to be provided within or adjoining the Leicester PUA. This regional policy is based founded on a robust and credible evidence base and evidence and the Council's continued use of the overall RSS housing requirement implies this. As noted above, to then depart from the RSS distribution strategy for the PUA risks making the Core Strategy unsound.</p> <p>The SHLAA which forms part of the Council's evidence base for the Core Strategy indicates significant capacity in the Leicester urban fringe area of 1,593 dwellings. Furthermore, the transport related work undertaken considers a higher number of dwellings being accommodated in the PUA than was finally adopted in the RSS and identifies no "show stoppers" to 880 dwellings in this urban location. There does not therefore appear to be any sound basis for the Council to allocate fewer dwellings to the Leicester urban fringe than required in the RSS policy or identified as acceptable through the evidence base.</p>	To achieve soundness it is considered that the requirement for the Leicester urban edge should be increased in line with the minimum requirements of the East Midlands Regional Plan. Total Provision over the plan period 2006-2028 needs to be increased to 882 dwellings therefore, leaving sites for an additional 485 dwellings to be identified. Table 3 should be amended accordingly.
2065/545	Trustees of the Bushby Settlement c/o Mather Jamie	<p>It is considered that this part of the policy is not effective and is not justified by evidence. The limits to development as defined in the 2001 Local Plan were reflective of the development requirements of that Plan and the material circumstances at that time. The merits for the particular limits to development around settlements needs to be reviewed and updated. In this context it is clear that the requirements of the rest of Policy 2 will necessitate amendments to these boundaries and therefore the material weight which the limits to development are given in the determination of future planning applications will be diminished.</p> <p>The recent decision of an Inspector in respect of an appeal against the refusal of planning permission at London Road, Markfield (Hinckley and Bosworth Borough ref APP/K2420/A/10/2125649) supported this view.</p>	
2065/546	Trustees of the Bushby Settlement c/o Mather Jamie	The net minimum density requirements set out in Policy 2(f) are inconsistent with guidance published in PPS3 (June 2010) which no longer seeks to set a national minimum requirement. It is unclear which parts of the evidence base support these broad minimum requirements across the district, particularly the 30dph required outside of the Market Harborough and Lutterworth central areas. In this respect the policy is not justified, effective or in accordance with national policy. Whilst the policy does seek to be flexible, it would be more effective were it to be significantly more refined, reflecting the guidance given in paragraph 46 and 47 of PPS3.	To achieve soundness this element of the policy needs to be supported by evidence to demonstrate that the type of housing likely to be required throughout the district can be provided at the densities sought.
2066/553	Davidsons Group	<p>Time Horizon of Core Strategy</p> <p>It is considered that the Core Strategy is not legally compliant and is unsound because the planned time horizon for the document will be less than 15 years from the date of adoption to the end of the monitoring year 2026. This fails to conform to national planning policy set out at paragraph 4.13 of PPS12.</p>	<p>Time Horizon</p> <p>The Core Strategy should work to a time horizon beyond 2026. It is logical, in the absence of a review of a Regional Strategy, to work to a period which reflects the most recent household population projections.</p> <p>A time horizon of 2028 reflects a twenty year period from the base year of</p>

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		<p>Paragraph 1.8 and Table 1 of the document sets out that it is expected that the expected adoption date is late 2011. In terms of housing delivery this is well into the monitoring year 2011/2012. A 15 year time horizon would take the Core Strategy into at least 2027.</p> <p>The time horizon has particular significance for the delivery of housing and therefore Policy 2. PPS3 paragraph 53 requires that “local planning authorities should set out in their Local Development Documents their policies and strategies for delivering the level of housing provision, including identifying broad locations and specific sites that will enable continuous delivery of housing for at least 15 years from the date of adoption.” Given that the proposed Core Strategy does not actually allocate any specific sites to deliver housing, the time horizon of the Core Strategy should take account of the time required to prepare and adopt subsequent documents that will perform this role. In the context of the Harborough Local Development Scheme, the relevant document is the Allocations Development Plan Document and accompanying proposals map, together with a Community Infrastructure Levy Charging Schedule. An horizon of 2026 clearly does not allow sufficient time for the preparation and adoption of these documents, and therefore the proposed time horizon of the Core Strategy also fails the test of soundness on account of its lack of conformity to national planning policy. Table 2 and the first sentence of Policy 2 therefore do not accord with PPS3 advice.</p>	<p>the most recently published national household projections (2008), and gives the Council until April 2013 to adopt the necessary Development Plan Documents to allow a continuous supply of housing for a 15 year period in accordance with PPS3. Indeed, this timescale accords with the Council’s most recent draft Local Development Scheme (reported to Executive Committee December 20th 2010).</p> <p>The additional 2 year period and the associated additional housing requirements are not considered to be so significant to require substantial review of the Core Strategy preparation and would entail a scale of additional development which would not be so significant to require fresh assessment of its impacts.</p>
2066/554	Davidsons Group	It is considered that the second sentence of this part of the Policy is not sound as it is not effective. Additional supply within any settlement clearly relies upon the availability of sites and the willingness of landowners and developers to submit planning applications. This statement does not explain where this source of supply will come from.	To achieve soundness it is considered that it would be prudent to include a 10% non-implementation allowance on commitments. Commitments at 2010 are 2,433. In total a further 238 dwellings should be provided for across the District.
2066/555	Davidsons Group	<p>It is considered that the distribution of development planned for within this section is not justified because it is not the most appropriate strategy when all other strategies are considered. We have a number of specific points of objection:</p> <p>1. Whether the proposed requirement for Lutterworth can be delivered within the plan period on appropriate sites, whilst at the same time retaining sufficient employment land in the settlement, is questioned. Whilst the SHLAA identifies a potential capacity of 733 dwellings at Lutterworth, only 47 dwellings of this capacity comes from sites which are ‘deliverable’ in PPS3 terms and all of these are existing commitments. Of the 547 dwellings proposed at Lutterworth, capacity for only 47 exists on ‘deliverable’ sites. Of those identified as ‘potentially developable’, sites Lt002/09, Lt008/09, Lt012/09, Lt024/09 and Lt025/09 (total capacity 172 dwellings) each have existing occupiers and are in industrial use. Conversion to residential would involve the loss of a large proportion of employment uses within Lutterworth and may be constrained by noise and amenity issues. Furthermore, sites Lt018/09, Lt027/09, Lt033/09 and Lt034/09 (capacity 225 dwellings), together with sites Lt008/09, Lt024/09 and Lt025/09, are all adjacent to either M1 or A4303 meaning traffic noise may significantly constrain development. Furthermore, these sites have physical constraints associated with either access, flood risk or topography which would place in doubt their suitability for housing.</p> <p>2. The proposed requirement for Broughton Astley of 300 dwellings of which 270 are to be affordable is unlikely to enable the provision of additional services and facilities. Instead it is likely to place further pressure on the limited number of existing facilities and services. In addition, the proposed 90% affordable tenure, as specified by Policy 16, is unlikely to be delivered in the current economic climate where there is a shortage of grant funding and its ability to contribute to meeting the housing requirement of the district within the plan period is therefore questioned.</p>	<p>To achieve soundness it is considered that the following changes are required, which are reflected in the amendments to table 3 below.</p> <p>1. Reduce the proportion of housing to be provided at Lutterworth to 6% of overall provision. This reflects the lack of deliverable housing sites which have been identified at Lutterworth. Over the period to 2028 a total of 350 dwellings is proposed.</p> <p>2. Leave the provision for Broughton Astley as proposed to 2026 to reflect providing for affordable housing need if the availability of funding improves.</p> <p>3. It is considered that there is capacity to absorb the increased requirement at Market Harborough. Firstly, through the increased requirement to be met by a strategic development to the west and north west of Market Harborough to 1,500 dwellings. This quantum of development would support the provision of a new primary school on the site, together with two access points to the development, one from the A4304 to the south and one from the A6 north of Market Harborough. A concept masterplan of this alternative strategic development is enclosed with these representations within the promotional document prepared by Pegasus Planning Group on behalf of Davidsons Group.</p> <p>Secondly, it is considered that there is additional capacity on smaller sites within or adjoining Market Harborough. The Strategic Housing Land Availability Assessment identifies capacity for a number of smaller developments within and adjoining the Market Harborough urban area and</p>

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		<p>3.Distribution for Market Harborough does not sufficiently reflect its role within the District nor its status in the East Midlands Regional Plan. Market Harborough clearly functions as a service centre for the surrounding sub-region which is mostly rural. The town has a population of over 20,000 people and a good range of comparison and convenience shopping, together with schools, and a range of employment provision. This is significantly more sustainable than other locations in Harborough District. Its sustainability credentials role are reflected in the policy of the East Midlands Regional Plan, which requires that outside of the Leicester Urban Area, housing will be located mainly at Market Harborough, including Sustainable Urban Extensions as necessary.</p> <p>The settlement has the ability to contribute more to housing land supply through the provision of a strategic development which is genuinely able to deliver associated benefits to the town, as well as the development of a number of smaller sites within or adjoining the existing urban area.</p> <p>4.The provision for the Leicester urban edge does not accord with Policy 13A of the East Midlands Regional Plan, which requires at least 40 dwellings per annum to be provided within or adjoining the Principal Urban Area of Leicester.</p>	<p>it is considered that further suitable sites exist around the settlement boundary and will come forward over the plan period to deliver the additional 600 dwellings proposed.</p> <p>4.The requirement for the Leicester urban edge should be increased in line with the minimum requirements of the East Midlands Regional Plan. Total Provision over the plan period 2006-2028 needs to be increased to 882 dwellings therefore, leaving sites for an additional 485 dwellings to be identified.</p>
2066/556	Davidsons Group	<p>It is considered that this part of the policy is not effective and is not justified by evidence. The limits to development as defined in the 2001 Local Plan were reflective of the development requirements of that Plan and the material circumstances at that time. The merits for the particular limits to development around settlements needs to be reviewed and updated. In this context it is clear that the requirements of the rest of Policy 2 will necessitate amendments to these boundaries and therefore the material weight which the limits to development are given in the determination of future planning applications will be diminished.</p> <p>The recent decision of an Inspector in respect of an appeal against the refusal of planning permission at London Road, Markfield (Hinckley and Bosworth Borough ref APP/K2420/A/10/2125649) supported this view.</p>	Delete part d) as boundaries must be reviewed as part of the Allocations DPD preparation.
2066/557	Davidsons Group	With reference to the net minimum density requirements and targets in respect of dwelling mix there is likely to be a conflict in certain cases between the achievement of 40 dwellings per hectare in central areas and achieving a range of house types to meet identified local needs. It is unclear whether this element of the policy is supported by any evidence to demonstrate the likely housing type requirements can be accommodated at the densities sought. Whether this part of the policy is justified is therefore questioned.	<p>To achieve soundness this element of the policy needs to be supported by evidence to demonstrate that the type of housing likely to be required throughout the district can be provided at the densities sought.</p> <p>Proposed Changes:</p> <p>The District's total housing requirement of 7,000 7,700 dwellings will be provided in a sustainable manner, by:</p> <p>a) The development of housing sites with planning permission. Any shortfall in the delivery of current commitments will be made up by the granting of planning permissions for the settlement concerned.</p> <p>b) The allocation and development of sites for additional residential development in sustainable locations within the District, in accordance with the following distribution:</p> <ul style="list-style-type: none"> • 1,200 2,100 dwellings will be provided at Market Harborough. This will include a strategic development area of approximately 1,000 1,500 dwellings immediately to the west and north west of Market Harborough;

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
			<ul style="list-style-type: none"> • 500 350 dwellings will be provided at Lutterworth; • 350 485 dwellings will be provided at the Leicester urban fringe; • 300 dwellings will be provided at Broughton Astley • 376 495 dwellings will be provided between the following rural centres: Fleckney, Billesdon, Ullesthorpe and Husbands Bosworth, together with the selected rural villages identified at Core Strategy Policy 17. <p>Table 3 to be amended as follows:</p> <p>□ □ Total Built □ Leicester Urban Fringe □ Market Harb. □ Lutterworth □ Broughton Astley □ Rural Centres □ Rural Villages</p> <p>A □ Total remaining need to 2028 □ 7,700 □ □ □ □ □</p> <p>B □ Total Built □ 1,841 □ 208 □ 798 □ 84 □ 50 □ 285 □ 416</p> <p>C □ Total Committed □ 2,368 □ 210 □ 935 □ 47 □ 0 □ 950 □ 226</p> <p>D □ 10% Non Implementation □ -238 □ -21 □ -94 □ -5 □ 0 □ -95 □ -23</p> <p>E □ Remaining to be found (A-B-C-D) □ 3,729 □ □ □ □ □</p> <p>F □ Planned Growth (2006-2028) □ 3,730 □ 485 □ 2,100 (inc 1,500 to w of M Harb) □ 350 □ 300 □ 495</p> <p>G □ Total Built, committed and planned (B+C+D+E) □ 7,701 □ 882 (11%) □ 3,739 (49%) □ 476 (6%) □ 350 (5%) □ 2,254 (29%)</p>
2067/558	Davidsons Group	<p>Part b) of the policy indicates how the overall housing requirement will be distributed across the district. The allocation for the Rural Settlements of Fleckney, Billesdon, Ullesthorpe and Husbands Bosworth and selected rural villages is 376 dwellings.</p> <p>We support the identification of Billesdon as a Rural Centre. The settlement has a wide range of key facilities and services as well as a regular bus service linking the settlement to higher order services and job opportunities in Leicester and Uppingham. As such, the Core Strategy correctly recognises that Billesdon is able to support future housing growth.</p>	
2067/559	Davidsons Group	<p>It is considered that this part of Policy 2 (d) is not effective and is not justified by evidence. The limits to development as defined in the 2001 Local Plan were reflective of the development requirements of that Plan and the material circumstances at that time. The extent of these limits to development around settlements needs to be reviewed and updated. In this context it is clear that the requirements of the rest of Policy 2 will necessitate amendments to these boundaries and therefore the material weight which the limits to development are given in the determination of future planning applications will be diminished.</p> <p>The recent decision of an Inspector in respect of an appeal against the refusal of planning permission at London Road, Markfield (Hinckley and Bosworth Borough ref APP/K2420/A/10/2125649) supported this view.</p>	We suggest deletion of part d) of Policy 2. This would ensure consistency with the rest of the Core Strategy document, which proposes development adjoining the Limits to Development of identified settlements.

Policy 3 Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
3353/16	Leicestershire Fire and Rescue	Within this policy there are statements regarding safety for people residing in the area, this is sometimes expressed as 'community safety' as in Objective 8. However, the emphasis appears to be more about crime, fear of crime and reduction of ASB with no clear references as to how the strategy will promote community and personal safety and responsibility. Little or nothing is offered that recognises the use of good design to promote safety within the home, for example; nothing is stated that indicates that there is an understanding that design can significantly contribute to the reduction of risk from deliberate ignitions perpetrated outside the home that could endanger occupants (effective management and storage of waste material), or that appropriate house construction combined with smoke detection and automatic domestic fire suppression installation efficiently and effectively promotes risk management and personal responsibility, makes for a safer community and, in the long term, reduces financial burdens on community infrastructure and services. Clearly, housing growth whether that is in urban or rural areas, will impact on the public infrastructure and the core strategy should demonstrate a cognizance of that potential impact and present a framework describing how the impact will be addressed or mitigated.	Within this policy there are statements regarding safety for people residing in the area, this is sometimes expressed as 'community safety' as in Objective 8. However, the emphasis appears to be more about crime, fear of crime and reduction of ASB with no clear references as to how the strategy will promote community and personal safety and responsibility. Little or nothing is offered that recognises the use of good design to promote safety within the home, for example; nothing is stated that indicates that there is an understanding that design can significantly contribute to the reduction of risk from deliberate ignitions perpetrated outside the home that could endanger occupants (effective management and storage of waste material), or that appropriate house construction combined with smoke detection and automatic domestic fire suppression installation efficiently and effectively promotes risk management and personal responsibility, makes for a safer community and, in the long term, reduces financial burdens on community infrastructure and services. Clearly, housing growth whether that is in urban or rural areas, will impact on the public infrastructure and the core strategy should demonstrate a cognizance of that potential impact and present a framework describing how the impact will be addressed or mitigated.
3438/26	Cllr M Rook	All forms of Affordable Tenure robustly contained within this policy. Economic downturn has done little to dampen the rational requirement for affordables, especially to allow rural dwellers to maintain their offspring locally if so desired. Urban affordable housing best suited to non-car ownership, single occupancy, and non isolation. This Policy address all these.	
2019/85	Kibworth Beauchamp Parish Council	Evidence of participation has not been shown because the views of the local community as expressed by the PC in their response to the Core Strategy Alternative Options has been ignored as a preference for Option 1 and for a 30% threshold was clearly stated.	The minimum number of affordable dwellings should be 30% across the whole District; rural centres should not have a different allocation of the 40%.
2021/91	East Midlands Housing Group	We support the flexible approach to tenure split (i.e. between rented and shared ownership) suggested as this will then be able to take into account needs/ demand and viability issues over the plan period which may change. We would support the development of an Affordable Housing Supplementary Planning Document that would set out details of the requirements e.g. housing mix, type, tenure, size, quality etc. Also issues such as viability assessments. The recently announced proposed changes to both planning and the delivery model / funding for affordable housing are likely to have an impact on this and as yet we are awaiting further details which can then be taken into consideration. How will this document take into consideration changes to planning and affordable housing delivery?	Under f) we would suggest that the needs of vulnerable / supported housing client groups are taken into consideration. Where a commuted sum will be appropriate to provide the affordable housing on an alternative site, it would be helpful to have set out either in this document or within an Affordable Housing SPD the basis of this calculation, how commuted sums will be allocated to deliver the affordable housing on other sites and how these priorities will be determined.
3668/145	Mr N Renner	The affordable housing requirement at 40% should be reconsidered to reflect current housing values and market conditions. There is concern that the increase in affordable housing requirements may undermine the delivery of schemes, reducing the overall supply.	Maintain affordable housing at 30% as per the current adopted SPD.
3683/160	John Martin Associates	3.1 Our view is that this part of the Core Strategy – Proposed Publication Version is Legally Compliant and Sound. 3.2 We note the general thrust of the Proposed Core Strategy and acknowledges that new housing developments must seek to secure balanced and mixed communities. However, our client objects to the assumption that there is a differential between	Needs to be compliant with PPS3

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		<p>sub-market areas of the District, and that one area will deliver a minimum of 40% of affordable housing, and that another sub-market area will deliver a minimum of 30%. There is currently no certainty that the Homes and Communities Agency will provide sufficient funding to RSL's at a level that would result in the delivery of affordable housing. 3.3 Paragraph 29 – Affordable Housing - of Planning Policy Statement 3 “Housing”, states that Local Planning Authorities should set an overall target for the amount of affordable housing to be provided, and that this target should reflect the new definition of affordable housing in the PPS. The PPS Statement continues by advising that the local targets should reflect an assessment of the likely economic viability of land for housing within the area, taking account of risks to delivery and drawing on informed assessments of the likely levels of finance available for affordable housing. 3.4 This Proposed Publication Version does not acknowledge the guidance contained within, and is therefore inconsistent with PPS3 in that it would severely restrict the provision of shared equity, key-worker and other low-cost housing solutions in favour of social rented accommodation, and would therefore significantly impact upon development viability and the delivery of affordable housing. In terms of the current economic climate, where there is a down-turn in activity in the housing market, this percentage split would discourage developers from entering the market, and ultimately this would have a dramatic effect upon the target of delivering a minimum of 7000 new homes between 2006 and 2026, as set out in the Proposed Core Strategy. 3.5 We would propose that each individual site should be assessed on its own merits, and therefore local housing need should be taken into account in determining the percentage split of affordable housing within the sub-market areas. Recent case law has found that affordable housing policies have been challenged through the courts, where Local Planning Authorities have failed to fully consider and set out an assessment of economic viability within the policy. In this respect, Blyth Valley District Council was taken to the High Court by three house builders', who claimed that that a policy of introducing a 30 per cent affordable housing policy prejudiced their housing plans. Senior planning judge Mr Justice Collins ruled that a Planning Inspector on whose recommendation the council adopted the policy, failed to consider its economic viability.</p>	
3685/164	Fleckney Parish Council	The requirement for a provider of a single dwelling to make a contribution to affordable housing will impact on the development of single plots (infill) with the current limits of development.	The requirement to make a contribution to affordable housing be applied to developments of two dwellings or more.
2038/189	Langtree Group PLC	<p>Langtree Group PLC supports the need to deliver affordable housing. However, the need to deliver affordable housing should be tempered with the reality of delivering the development. Therefore, the need for flexibility should be recognised within Policy 3. This is recognised in PPS3 paragraph 29, which states the target should reflect an assessment of the likely economic viability of land for housing within the area.</p> <p>This approach clearly places the onus on the Local Authority to understand the risks of delivery, levels of finance available for affordable housing and the level of development contributions that can reasonably be secured. This stance should therefore be incorporated into Policy 3. If this approach is not incorporated into Policy 3 then it will not fully reflect or accord with national guidance.</p> <p>Affordable housing policies need to be flexible to enable sites to be viable for development, to reflect the housing need in different areas and other elements of planning gain resulting from the developments. Therefore, continual monitoring would be required to establish the up-to-date housing needs for an area and the required affordable housing provision. This should be clearly stated within the policy itself.</p> <p>The terminology used in the policy does not accord with government guidance. In particular “all residential developments within Harborough District will be required to contribute”. The Authority can only seek affordable housing, as per PPS3 and that includes the mix and types of affordable dwellings. As such, each site should be assessed on its own merits, with consideration</p>	<p>Proposed Change</p> <ul style="list-style-type: none"> • The terminology should be changed from “required” to indicate that the Council will “seek” affordable housing contributions i.e. Harborough District Council will seek contributions towards meeting affordable housing needs. • The conflicting statements within the policy should be removed.

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		<p>of an up-to-date local housing needs assessment. Furthermore, as currently drafted the policy is self-conflicting. The policy states at the outset that all sites will contribute to affordable housing and that in most cases this will be provided on site; however an exceptions case is highlighted for 3 or fewer units. It is clear that 40% cannot be delivered on sites of 3 or fewer units and therefore this policy should be clarified to confirm a financial contribution on proposals of less than 3 units. Clarification should therefore be provided, as currently drafted Policy 3 lacks clarity and is unsound.</p> <p>Furthermore, by stating that all developments will contribute and then stating exceptional circumstances, the Council are acknowledging that not all developments will contribute. The Policy is therefore unsound as currently drafted.</p> <p>Langtree Group do not consider that the Viability Assessment robustly justifies reducing the threshold down to a single unit. Furthermore, the implications for reducing the threshold could inhibit site delivery for smaller sites as it will render small scale schemes unviable. PPS 3 states that affordable housing targets should be set rather than specific requirements, and that the requirement should be based on informed viability assessments. The implication of reducing the threshold will be that the overall housing requirement for the district will not be achieved. The policy as it stands will affect the delivery of new housing developments, conflicts with itself and is not robustly just. As currently drafted it is too rigid and inflexible and not in accordance with government guidance, it is therefore unsound when considered against the requirements of PPS12.</p>	
2039/195	Mr & Mrs Woodcock	Policy 3: Delivering Housing Choice and Affordability sets out affordable housing standards for all residential developments in Harborough District. Paragraph a) states that in the sub-market areas of Harborough Rural South West and Harborough Rural North & Central a minimum of 40% of the total number of dwellings will be affordable. In the remaining three sub areas this figure is 30%. The policy is supported by the findings of the Harborough District Affordable Housing Viability Assessment, which recommends increasing the percentage of affordable housing in the two rural sub-areas, where viability is less of a concern. As such, the policy is justified in the sense that it is supported by an up-to-date evidence base. However, in accordance with paragraph 29 of PPS 3, affordable housing targets for the district will need to be based upon up-to-date assessments. The housing needs assessments for the District will therefore need to be constantly reviewed and updated throughout the duration of the plan period if the policy is to remain justified.	
3628/204	Dr K Feltham	Affordable homes are needed in rural villages as well as larger urban areas. Totally agree with the threshold for the application of this policy being 1 dwelling.	
3590/207	Claybrooke Magna Parish Council	This policy with regard to the 40% value areas and it being a threshold of application of one dwelling, means that the way the document is worded, that no homes other than starter homes can be built on a site that is suitable for a single dwelling! Also 5.31 is not true and does not tie in with 5.36. Most concerning, is that these issues have been discussed and consulted on (I have attended several of the initial forums on this) yet the key issues arising out of those have not been heeded. Critically there is a need for starter homes for locals, yet the way the policy is structured, there is little to enable this requirement to be managed.	Policy needs to be based on the consultations otherwise it can be argued as not being considered.
2042/240	Western Range	It is intended that the High Street residential development which Western Range are promoting could provide up to 30% affordable housing with a range of housing tenures including rented units available through a housing association and shared ownership dwellings. Within the open market houses, a range of dwellings types and sizes would be provided to appeal to the greatest number of potential new residents. Please see the accompanying promotional document for the development of the land.	

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2044/247	Barratt Strategic	It is intended that the Springhill Farm residential development which Barratt Strategic are promoting could provide up to 40% affordable housing with a range of housing tenures including rented units available through a housing association and shared ownership dwellings. Within the open market houses, a range of dwellings types and sizes would be provided to appeal to the greatest number of potential new residents. Please see the accompanying Promotional Document for the development of the land.	
2045/252	David Wilson Homes	It is intended that the Gaulby Road, Billesdon residential development could provide up to 40% affordable housing with a range of housing tenures including rented units and shared ownership dwellings being available through a housing association. Within the open market houses, a range of dwellings types and sizes would be provided to appeal to the greatest number of potential new residents. Please see the accompanying promotional document for the development of the land.	
3602/265	Ms C Renner	A variety of dwellings should be provided and a flexible approach to the provision of affordable housing is welcomed in line with Policy 3.	
2048/268	A Walter Smart & Son	The Council proposes to increase the requirement for affordable housing in parts of the District from a minimum of 30% to a minimum of 40%. We are concerned that this could affect the delivery of future residential development and delay the delivery of new homes. We consider that the policy should be flexible to deal with changing economic circumstances and sites where the delivery of a minimum of 40% affordable housing is not viable. The policy should note that there may be genuine circumstances where a lower level of affordable housing is appropriate because of viability, site characteristics or abnormal costs. Where these circumstances arise, the policy should provide the flexibility for applicants to justify a maximum amount of affordable housing by undertaking a financial appraisal to assess viability. This would normally take the form of an open book financial appraisal assessing the financial viability of a proposed development to determine the 'residual' land value.	<p>We suggest that Policy 3 should be amended to read as follows:- Policy 3: Delivering Housing Choice and Affordability</p> <p>All residential developments within Harborough District will be required to contribute towards meeting affordable housing needs. The threshold for the application of this policy is therefore 1 dwelling.</p> <p>a) A minimum of 40% of the total number of dwellings will be affordable within the two highest value submarket areas of Harborough Rural South West and Harborough Rural North and Central. In the remaining three sub-market areas, a minimum of 30% of the total number of dwellings will be affordable.</p> <p>b) Affordable housing will be provided on-site in most cases. However provision of affordable housing on an alternative site or by way of a commuted sum will be allowed in very exceptional circumstances, or where it can be robustly justified. Exceptional circumstances are where a location and/or scheme are not suitable for on site provision, such as an unsustainable location or where service charges are high. On sites of 3 or fewer units, an affordable unit will be provided on site, on an alternative site or a commuted payment made based on the equivalent cost of on site provision which will be used to contribute to other local affordable housing provision.</p> <p>c) The Tenure Split for all affordable housing will remain flexible to represent housing need at the time of the planning application being received. Where development is phased, tenure split will be determined by the Council closer to the time of delivery.</p> <p>d) Development should integrate affordable housing and market housing, with a consistent standard of quality design and public spaces, to create mixed and sustainable communities. The type of both market and affordable housing required will be assessed on a site by site basis and guided by the findings of the Strategic Housing Market Assessment and other evidence of local need.</p> <p>e) Affordable housing needs in rural areas will be met in rural centres and other settlements as referenced in Policy 17 through partnerships with landowners, parish councils and housing providers.</p>

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			<p>f) Developments will contribute to the provision of affordable homes that are suitable to the needs of older persons and persons with disabilities. The Council will work with partners to deliver Special Needs Housing (for example supported housing / extra care type facilities) when specific needs have been identified.</p> <p>g) If there are genuine circumstances where the applicant is unable to deliver the target provision of affordable housing due to viability, site characteristics or abnormal costs, the Council will consider a financial appraisal prepared by the applicant which justifies the maximum provision of affordable housing.</p>
3617/286	Bovis Homes	Bovis Homes object to the omissions from Policy 3 of a clear definition of 'affordable housing' and the split between 'social and intermediate housing'. The requirement to provide a tenure mix is identified at paragraph 29 of Planning Policy Statement 3: Housing. Accordingly, this aspect of the Core Strategy is unsound.	Include the tenure split and definition of affordable housing.
2055/339	Leicestershire County Council	There is no reference to how HDC will support delivery of affordable rural housing through potential delivery vehicles such as Rural Exception Sites. Rural Exception Site is included in the Glossary but not in the main body of the Core Strategy. The threshold of 1 dwelling for application of this Policy Policy 3 is supported.	Support of other delivery vehicles in addition to windfall schemes which might bring forward sustainable development should be explored.
2055/340	Leicestershire County Council	Para 5.29: The text is difficult to understand.	The information should be summarised in a table.
2062/403	Ms R Page	There has always been an over provision of dwellings with in the Harborough District and according to the present figures this will continue. Therefore there is no evidence for the need to permit further development sites. There is no proper need analysis to the mix and what house types are required to reflect the need of the community in the district especially reflecting the need of the growing aging population of the district.	
2062/406	Ms R Page	The claim that flat accommodation in Market Harborough would offset the need of these types of accommodation else where in the district is questionable and there is no evidence or logic attached.	
2063/409	CHRIS FREEMAN DESIGN LTD	The threshold for affordable housing is too low at 1 dwelling. This is neither justified (as there are other more logical options); effective as it will prevent the smaller sympathetic development rather than encourage them and not it is not consistent with national policy which suggest a higher threshold.	The threshold for affordable housing should be increased but developers of smaller schemes should be required to negotiate with the LPA to agree commuted sums towards such provision off-site. Smaller schemes are usually brought forward by local developers who are less able to procure such units due to the financial constraints of the projects. HDC's threshold is already too low and has probably overtly caused some of the shortage of affordable housing units in the district. Decreasing the threshold will not improve the situation but make it worse as it will have the effect of preventing otherwise viable developments which could bring forward financial contributions to affordable housing locally. Affordable housing is the realm of large scale housing developers not local developers. Whither 'localism' with such policies?
2064/421	Persimmon Homes North Midlands	Policy 3 does not establish an overall (plan-wide) target for the amount of affordable housing to be provided. This is a requirement of PPS3 and is set out in paragraph 23 of that document. In order to be consistent with national policy, Policy 3 should include an overall target having regard	Policy 3(a) should include an overall target for the amount of affordable housing required to be provided to comply with policy PPS3.

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		<p>to viability issues.</p> <p>Policy 3(a) includes minimum requirements of 40% and 30% affordable housing dependent upon the housing sub-market area within the district. Whilst the explanatory text to the policy explains that these requirements have taken account of the Leicestershire Affordable Housing Viability Study 2009, the policy does not reflect the potential change in circumstances and their impacts upon affordable housing provision outlined in that study. The Viability Study notes, in particular, that future infrastructure costs required through S106 agreements could be significantly different to the current level of contributions, on which the Viability Study is based. This is acknowledged to have an effect on the provision of affordable housing in paragraphs 6.10 and 6.20.</p> <p>In order to meet tests of effectiveness in terms of deliverability and flexibility, the policy should reflect the fact that affordable housing contributions will be negotiated with developers, taking account of site viability.</p>	<p>Policy 3(a) should be reworded to ensure that it is sufficiently flexible to deal with changing circumstances of site viability in the provision of affordable housing. This will ensure that the Core Strategy meets the tests of soundness by addressing the above concerns of deliverability and flexibility.</p> <p>The policy should be amended to read;</p> <p>a) A target of 40% of the total number of dwellings within the two highest value sub-market areas of Habrorough Rural South West and Harborough Rural North and Central and 30% within the three remaining three sub-market areas will be negotiated with developers to be affordable, having regard to site viability.</p>
2065/426	Trustees of the Bushby Settlement c/o Mather Jamie	<p>Policy 3 does not establish an overall (plan-wide) target for the amount of affordable housing to be provided. This is a requirement of PPS3 and is set out in paragraph 23 of that document. In order to be consistent with national policy, Policy 3 should include an overall target having regard to viability issues.</p> <p>Policy 3(a) includes minimum requirements of 40% and 30% affordable housing dependent upon the housing sub-market area within the district. Whilst the explanatory text to the policy explains that these requirements have taken account of the Leicestershire Affordable Housing Viability Study 2009, the policy does not reflect the potential change in circumstances and their impacts upon affordable housing provision outlined in that study. The Viability Study notes, in particular, that future infrastructure costs required through S106 agreements could be significantly different to the current level of contributions, on which the Viability Study is based. This is acknowledged to have an effect on the provision of affordable housing in paragraphs 6.10 and 6.20.</p> <p>In order to meet tests of effectiveness in terms of deliverability and flexibility, the policy should reflect the fact that affordable housing contributions will be negotiated with developers, taking account of site viability.</p>	<p>Policy 3(a) should include an overall target for the amount of affordable housing required to be provided to comply with policy PPS3.</p> <p>Policy 3(a) should be reworded to ensure that it is sufficiently flexible to deal with changing circumstances of site viability in the provision of affordable housing. This will ensure that the Core Strategy meets the tests of soundness by addressing the above concerns of deliverability and flexibility.</p> <p>The policy should be amended to read;</p> <p>a) A target of 40% of the total number of dwellings within the two highest value sub-market areas of Habrorough Rural South West and Harborough Rural North and Central and 30% within the three remaining three sub-market areas will be negotiated with developers to be affordable, having regard to site viability.</p>
2067/437	Davidsons Group Ltd	<p>Policy 3: Delivering Housing Choice and Affordability sets out affordable housing standards for all residential developments in Harborough District. Paragraph a) states that in the sub-market areas of Harborough Rural South West and Harborough Rural North & Central a minimum of 40% of the total number of dwellings will be affordable. In the remaining three sub areas this figure is 30%.</p> <p>The policy is supported by the findings of the Harborough District Affordable Housing Viability Assessment, which recommends increasing the percentage of affordable housing in the two rural sub-areas, where viability is less of a concern. As such, the policy is justified in the sense that it is supported by an up-to-date evidence base. However, in accordance with paragraph 29 of PPS 3, affordable housing targets for the district will need to be based upon up-to-date assessments. The housing needs assessments for the district will therefore need to be constantly reviewed and updated throughout the duration of the plan period if the policy is to remain justified.</p>	
2074/456	Mrs P Hays	<p>We consider that the requirement to provide 40% of all new housing in the rural areas as affordable housing is not deliverable as it is not affordable by developers. It is therefore not and will not be effective. Our reasons are:</p> <ul style="list-style-type: none"> • land values have fallen; 	<p>Amend Policy 3 a) should require a maximum of 30% of affordable houses to be provided on qualifying sites.</p>

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		<ul style="list-style-type: none"> • Housing build costs have increased to achieve higher sustainability standards - Sustainable Homes Code 6 by 2016; also higher material and labour costs; • Developers' risks have increased due to market volatility and constraints imposed by lending institutions - on housebuilders on borrowing limits and valuations of property assets, and on house buyers on amounts of deposits required/property valuations; • Current state of the economy which is forcing real incomes to fall; • Impacts of S106 requirements and potential CIL demands; • lack of grants, and reductions in social rent levels which is reducing what RSLs/Housing Associations will pay for affordable homes to below cost price .. <p>Viability studies to underpin this policy are out-dated, and are unrealistic, and will remain so for the foreseeable future. We therefore urge a more realistic policy, based on a maximum of 30% affordable in rural centres/villages and 20% - 25% elsewhere. If the affordable housing requirement is maintained at 40% it is likely that this policy will lead to the non-delivery of new housing in the rural areas and also elsewhere.</p>	
2075/459	Andrew Granger & Co on behalf of various clients	<p>The delivery of 'affordable' housing remains an acknowledged problem throughout the Country. Policy 3 and the supporting text is a serious concern and fails to address the issue in the manner advised by Government in PPS 3: Housing, and Delivering Affordable Housing (Department for Communities and Local Government).</p> <p>The proposed threshold of 1 dwelling will effectively severely restrict the delivery of homes across the District. Government guidance indicates 15 dwellings as the threshold, but allows for thresholds below this if fully substantiated. A reasonable balance has to be struck, and the ability to deliver in the rural areas of the District is jeopardised by this policy. It is unclear as to its intentions and how it will work. The whole question of delivery and threshold needs to be addressed more equitably and realistically.</p>	The threshold of 1 dwelling should be deleted from Policy. The substantiation and agreement of a more appropriate threshold needs to be substituted, and in the absence of this, the Government's advice of 15 dwelling threshold be accepted.
2077/468	Mr D Mason		<p>The argument for the provision of affordable housing often given as a need in rural locations can be compelling, but the conditions of occupancy of such properties are not so clear; particularly when units so provided are sold on. If schemes are to prevent entrepreneurial easy picking and the need for continued replacement of this stock, units built for this function must remain so throughout their usable lives - through control of sell on prices. However, to constrain home owners to lower than market price at resale seems unfair. In respect of this it seems that affordable housing is perhaps best suited to the rented estate as controlled by Council/Housing Associations etc. However, low rented Council controlled properties are themselves beset by the allocations trap; in simplicity, how does a Council determine the income of a prospective lease for allocation eligibility and later as income rises for withdrawal of eligibility. Carefully framed Requirements and Conditions of Occupancy, made clear to prospective tenants at outset and subsequently rigidly applied is perhaps the simplest way of ensuring trouble free tenancy. It is here worthy of mention that many, maybe most young people, including those from rural beginnings may in their early working lives wish to live in towns or cities. There are many advantages to urban life; employment, transport, low rents, more leisure outlets etc.</p>
2078/475	Mrs D Root		In smaller communities where 'in filling' is used, it would be far preferable to be insisting that 1+2 bedroom dwellings are erected instead of 4+5 bedroom dwellings until such time as a proper balance of housing has been

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			reached. This then addresses the problem of smaller and affordable houses in rural areas in a simple way.
2081/488	Bitteswell Parish Council	<p>The Core Strategy sets out with clarity the plan for delivering the dwellings to be provided in the balance of the Plan Period, and how these will be distributed across the District. However, other than for a brief reference regarding the demand for affordable dwellings, it is silent on the determination of the need that underpins the overall plan for the delivery of dwellings. This is a critical shortcoming of the present version of the Core Strategy. Revisions should include a full explanation of how the need is modelled; how the value of need is computed, and, as it is a dynamic quantity, how the need will be monitored during the Plan Period and the programme for delivery adjusted accordingly. As it stands, with regard to housing, the Core Strategy could be characterized as being 'long' on delivery, but materially 'short' on the fundamental issue of need.</p>	
2081/490	Bitteswell Parish Council	<p>The housing data detailed in the Core Strategy discloses the substantial overprovision of dwellings by the District Council that has occurred since the commencement of the Plan Period, and that this oversupply is forecast to persist throughout the balance of the Plan Period. In sharp contrast to the provision of market housing in the District, the delivery of affordable dwellings since the start of the Plan Period has fallen well short of demand. The Core Strategy offers little comfort to residents of the District seeking affordable accommodation that the application of the new proposals for dealing with this issue in the remainder of the Plan Period will be any more effective.</p>	
2081/505	Bitteswell Parish Council	<p>Paragraphs 5.24 -5.25 records that the need for affordable dwellings in the Harborough District is 'very high'. The need is quantified in the Strategic Housing Market Assessment (SHMA) which identifies a need of 264 affordable dwellings in the District for each of the years to 2016. In response to this requirement the District Council has proposed a target of 90 affordable dwellings per annum. As the proposed HDC target for affordable dwellings is only some 34% of the SMHA annual requirement to 2016 it is difficult to accept the claim in this paragraph that:</p> <p>'This Policy will deliver Strategic Objective 1 of the Core Strategy ... ' Noting that the average annual target for all housing is 350 it is difficult to understand why the affordable component has been set at 90, representing less than 26%. As the higher yield rate of 40% of affordable dwellings from development will apply in the sub-market areas, to which the largest number of dwellings are planned to be allocated, it is reasonable to conclude that the average yield across the district will be approximately 35%. If this proves to be the case, then the target annual number should be closer to 120 affordable dwellings per year. However, it seems to be self-evident that the policy of seeking to provide affordable dwellings solely as an incidental spin-off from market housing development is unsound and will fail to generate the affordable dwellings that are so desperately wanted. It is plainly imperative that a substantive policy, expressly directed to the provision of affordable dwellings as its primary objective is required. Unless a strategy along these lines is adopted the chronic under-provision of affordable dwellings will persist which, when contrasted with the overprovision of market housing, is likely to expose the District Council to unflattering commentary.</p>	
2081/506	Bitteswell Parish Council	<p>Part (e) of Policy 3, which spells out the intention to integrate affordable housing with market housing, is applauded. Likewise, the expressed aim of satisfying the need for affordable housing in rural areas through partnerships in which Parish Councils and others will participate, is welcomed.</p>	

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2081/507	Bitteswell Parish Council	Paragraph 5.27 identifies the required yield of affordable dwellings from developments in sub-market areas as either 30% or 40%. To reflect the acute need for affordable dwellings in rural settlements, it is noted that the Sustainability Appraisal of the Core Strategy advances a factor of 50% for development in these settlements. It is not evident that this higher factor has been incorporated in the Core Strategy, and the reason for this divergence from the Sustainability Appraisal is in need of explanation.	
2081/508	Bitteswell Parish Council	It is claimed in this paragraph that the provision of, for example, flat accommodation in Market Halborough could offset the need for this type of housing elsewhere in the District. The logic of this claim is questionable as it ignores the pragmatic issue of mismatch between where those requiring flats presently live and work, and the location of any surplus stock of flats.	

Policy 4 Representations

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3625/7	Derbyshire Gypsy Liaison Group	The intended level of provision as set out in Policy 4 is confusing and could be open to misinterpretation. If account is taken of the provision already made through the grant of planning permissions since 2006, it would appear that the provision to be made, through allocations and permissions, is for only 4 permanent residential pitches and only 3 plots for travelling showpeople. The position should be more clearly stated and it should be recognised that the indicated pitch requirement represents the minimum level of provision. Turning now to the criteria to be applied when determining planning applications, we would comment as follows: 1. It is inappropriate to apply the criteria to applications for stables. It is clearly nonsense to require that a proposed stable will only be acceptable if close to a settlement boundary or "within reasonable distance of local services." Applications for stables, whether for a Gypsy family or for other members of the community, should be judged against more relevant criteria. 2. Insofar as they are to be applied to applications for new Gypsy and Traveller sites and to applications to extend such sites, the criteria are unnecessarily restrictive. 3. Given that criterion "d" requires a location within reasonable distance of local services, criterion "a" is an unduly onerous restriction which serves no useful purpose. 4. Criterion "c" is also superfluous as the issue of highway safety is adequately controlled by criterion "f" and no other public safety issues arise. 5. Criteria "g" is unnecessary and unduly restrictive. There will be situations where limited ancillary commercial activity is appropriate and acceptable. If commercial activity would be unacceptable at the particular location for which permission is being sought, then this could be controlled by a planning condition. 6. It is arguable that criterion "h" should apply to Gypsy sites as well as sites for travelling showpeople.	The position should be more clearly stated and it should be recognised that the indicated pitch requirement represents the minimum level of provision. Turning now to the criteria to be applied when determining planning applications, we would comment as follows: 1. It is inappropriate to apply the criteria to applications for stables. It is clearly nonsense to require that a proposed stable will only be acceptable if close to a settlement boundary or "within reasonable distance of local services." Applications for stables, whether for a Gypsy family or for other members of the community, should be judged against more relevant criteria. 2. Insofar as they are to be applied to applications for new Gypsy and Traveller sites and to applications to extend such sites, the criteria are unnecessarily restrictive. 3. Given that criterion "d" requires a location within reasonable distance of local services, criterion "a" is an unduly onerous restriction which serves no useful purpose. 4. Criterion "c" is also superfluous as the issue of highway safety is adequately controlled by criterion "f" and no other public safety issues arise. 5. Criteria "g" is unnecessary and unduly restrictive. There will be situations where limited ancillary commercial activity is appropriate and acceptable. If commercial activity would be unacceptable at the particular location for which permission is being sought, then this could be controlled by a planning condition. 6. It is arguable that criterion "h" should apply to Gypsy sites as well as sites for travelling showpeople.
2019/86	Kibworth Beauchamp Parish Council	Evidence of participation has not been shown because the views of the local community as expressed by the Parish Council in response to the Core Strategy Alternative Options consultations has been ignored, where a preference for Policy 14 option 4 (Develop around existing sites) was clearly stated.	All wording after 'is located within, adjoining or close proximity to' should be omitted and replaced with 'existing sites'.
3685/166	Fleckney Parish Council	The identification of Fleckney as a potential site for gypsies and travellers has not been justified.	The Rural Centre of Fleckney be excluded from the locations identified as possible sites for a gypsy or traveller site.
3590/209	Claybrooke Magna Parish Council	Take the Bitteswell example, it is already too big and not developed in accordance with the strategy here. Furthermore enforcement action to get it in accordance with strategy has been a joke. There is little point in having strategies and policies if they are not going to be followed and enforced.	Action accordingly and enforce
3620/300	Lutterworth Town Council	The provision of Travelling Showpeople is currently concentrated at Lutterworth but this should not be concentrated to any greater extent. Provision should be concentrated in other areas, representing a more even distribution across the District.	Provision should be concentrated in other areas, representing a more even distribution across the District.
2055/341	Leicestershire County Council	Overall the Policy is quite balanced. However, a 3% year on year increase to pitch provision post 2016 as set out in the soon to be revoked Regional Plan should be included in the Policy. In addition, the Core Strategy should set out requirements for socially rented provision, recommended to be at 25%, as the District currently has none.	Amend Policy to include a 3% year on year increase to provision post 2016. Add a requirement for socially rented pitch provision.
2062/404	Ms R Page	The permanent pitches for Gypsies and Travellers / Show people has already exceeded programme demands and the future of the programme has not been addressed after 2016.	

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		A need of precision and policy is required to the end of 2026. There are only 2 more pitches needed to complete the requirement until the end of 2016 and there is no set out strategies.	
2076/461	Compass Group Great Bowden	I recognise GTAA within our infrastructure but the concerns are how many more and at what growth? This document indicates the locations around Bitteswell and Lutterworth, also mentions Greenacres off Leicester Road Market Harborough. Omitted are other sites within three miles of Market Harborough.	Justin Park, Midshires Ridge (south of Braybrooke), Cross Roads (east of Braybrooke) and Park Hill Farm are all just over the County boundary. A clear reference of all these sites should be made within the document. It should acknowledge their existence and the influence on this locality.
2081/491	Bitteswell Parish Council	The data on the delivery of permanent pitches for gypsies during the early stage of the Plan Period demonstrates, as for market housing, the propensity of the District Council to substantially exceed programme demands.	
2081/509	Bitteswell Parish Council	This Policy is inadequate in that, after the year 2016, there is no planned provision in the District for this sector of the population. The statement that seeks to deal with the post-2016 period is lacking in precision and out of place in a document whose salient objective is to prescribe the strategic plan until 2026. There is plainly need for a time-based programme for the provision of sites for Gypsies, Travellers and Showpeople throughout the Plan Period so that the areas for accommodation can be delivered as part of a planned and systematic process rather than as a reaction to initiatives by the Gypsy and Traveller community.	
2081/510	Bitteswell Parish Council	Table 8 records the grant of permissions pitches for Gypsy, Traveller and Showpeople pitches from 2007 to 2010. The programme requirement for the period 2007 to 2012 is 19 Permanent pitches and 10 Traveller pitches. By 2016 the requirement for Permanent pitches increases to 30; there is no additional need of Traveller pitches by that date. Comparison of the requirements with the number of approved pitches demonstrates that there has been substantial overprovision. As the current number of approved Gypsy Permanent pitches is 28, only two more pitches of this type need to be granted between now and 2016 to satisfy the programme requirement. At a meeting held on 9 November 2010 with officers of the District Council, members of this Council were advised that, of the 26 Permanent pitches approved at that date, 24 were at the Mere Fann site, nearby to Bitteswell.	
2081/511	Bitteswell Parish Council	The definition of the words 'reasonable distance', shown in this paragraph, is less than precise and would provide fertile ground for argument. Therefore, we consider that quantification of this phrase is imperative. Our comments on the novel nomination of 'local services' are made elsewhere in this Note.	
2081/512	Bitteswell Parish Council		In order to address the issue of the affects on nearby settled communities, the addition of a new condition (g) (to be included in the part of the paragraph dealing with Gypsy and Traveller sites) is recommended: (g) Does not affect adversely the amenity of residents in nearby settlements. The addition of the following new paragraph to Policy 4 is also recommended: To promote the integration of the occupants of Gypsy and Traveller sites with nearby settled communities, the allocation of such sites within the District will take into account the need to avoid the concentration of pitches in a limited number of locations. This will tend to encourage smaller sites, distributed more evenly across the District, in line with preferences expressed in the Leicestershire, Leicester and Rutland Gypsies' and Travellers' Accommodation Needs Assessment.

Policy 5 Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2024/104	Kibworth Harcourt Parish Council	The Council would point out that there will be a significant level of traffic increase on the A6 due to the proposed increase in housing levels, particularly with reference to the Gartree Airfield site. Promoting home deliveries would also increase traffic on the A6. The Council is also disappointed that no mention is made of a railway link for the Kibworths which could reduce road traffic on the A6 dramatically during rush hour periods.	
3353/17	Leicestershire Fire and Rescue	Clearly, this policy contains aims associated with improving safety of the transport infrastructure but the safety benefit appears to be a secondary consequence of desires to improve the aesthetics of the environment or of a drive to reduce costs. Safety does not seem to be expressed as being of importance in its own right. The emphasis of this section should demonstrate that safety considerations are as important, if not of greater importance, to those relating to cost and the environment.	
3438/27	Cllr M Rook	The transport section is the weakest section of the Core Strategy. However, as it is written, it remains a "valid stab" at where we might be in 15 years time. The use of the car is paramount and will remain the main means of travel in the rural setting, its effect on schooling needs, health provision and travel to work plans. Mitigation will come from new technologies already emerging. Given the lack of resource over the time of the LDF core strategy, LTP2 and LTP3 cannot be used either as a mitigation or a barrier to development plans with any confidence that the evidence will be meaningful.	
3653/197	Mrs R Black	Policy 17 allocates a proportion of 376 dwellings to Billesdon but Policy 5 gives no indication of how the A47 will be improved to cope with the extra traffic.	Assess the traffic impact upon the A47 and surrounding district
3628/205	Dr K Feltham	Sustainable Transport is necessary to reduce traffic and congestion. This policy needs to support the goals of Leicestershire County Council Local Transport Plan 3.	
2055/342	Leicestershire County Council	Para 5.17 states: "The development area [north west of Market Harborough] will be expected to deliver a number of basic everyday local services and facilities for its residents, together with significant investment in the provision of cycling / walking routes and public transport, in order to provide attractive alternatives to use of the private car." This seems to be contradicted by para 5.46, which states: "Owing to physical constraints within the historic urban areas of the District, the relatively limited level of development proposed and lack of expected public funding sources, the development strategy contained in this document does not rely on significant need for additional transport infrastructure but continues to direct most development into areas which already have capacity to offer transport choice for local journeys and make best use of existing infrastructure." The beginning of Policy 5 repeats the same message as para 5.46. In principle, making best use of existing infrastructure is to be supported. But, in respect of Market Harborough, this apparent contradiction adds to the highway authority's concerns about how it will be possible to deliver the strategic development area of the scale and location proposed without significant adverse travel impacts.	Amend text so that it is consistent. In respect of Market Harborough, it is likely that significant infrastructure investment will be required wherever the strategic development area is proposed.
2055/343	Leicestershire County Council	Para 5.17 states: "The development area [north west of Market Harborough] will be expected to deliver a number of basic everyday local services and facilities for its residents, together with significant investment in the provision of cycling / walking routes and public transport, in order	Amend text so that it is consistent. In respect of Market Harborough, it is likely that significant infrastructure investment will be required wherever the strategic development area is proposed. It may be helpful to clarify the

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
		<p>to provide attractive alternatives to use of the private car.” This seems to be contradicted by para 5.46, which states: “Owing to physical constraints within the historic urban areas of the District, the relatively limited level of development proposed and lack of expected public funding sources, the development strategy contained in this document does not rely on significant need for additional transport infrastructure but continues to direct most development into areas which already have capacity to offer transport choice for local journeys and make best use of existing infrastructure.”</p> <p>The beginning of Policy 5 repeats the same message as para 5.46. In principle, making best use of existing infrastructure is to be supported. But, in respect of Market Harborough, this apparent contradiction adds to the highway authority’s concerns about how it will be possible to deliver the strategic development area of the scale and location proposed without significant adverse travel impacts. A very limited piece of transport modelling has been carried out in Market Harborough using a single element of the new Leicester and Leicestershire Integrated Transport Model; considerable further work is required in the future. The Policy refers to “Highways Transportation and Development” has been adopted by a number of authorities in the East Midlands, who are now working together on its future development.”</p>	<p>Policy wording in this respect as follows: “All significant development proposals should provide for coordinated delivery of transport improvements as outlined in the place based policies (policies 13-17) of this Strategy as further informed by future application of the fully complete Leicester and Leicester Integrated Transport Model.” The correct title is “6Cs Design Guide”.</p> <p>“Proposals for assessing traffic impact, highway design and parking provision associated with new development should accord with the guidance contained in the “6Cs Design Guide Highways Transportation and Development”, published by Leicestershire County Council on behalf of a number of East Midlands authorities.”</p>
2055/344	Leicestershire County Council		<p>The Coalition Government has abandoned the DaSTS approach. Furthermore, the goals of the County Council’s LTP3 continue to be refined and developed, which will include reflecting on any responses received during the current public consultation exercise. They will not be finalised until approved by Full Council at the end of March 2011.</p> <p>In addition, there have always been two LTPs in Leicestershire; the change for LTP3 is that there will be no overlap between them, i.e. one will cover the administrative area of Leicestershire, the other the City’s administrative area. This correction is also intended to avoid the need for continuous updating/ revisions:</p> <p>“Policy 5, and other policies that promote sustainable development and social inclusion, aim to assist in the delivery of the next Local Transport Plans, LTP3. Local Transport Plans are developed by the Local Transport Authority following the Local Transport Act 2000. In Leicestershire, the County Council is producing one for its area and similarly Leicester City Council one for its area. These LTP3s will come into place from March 2011 and will set out the respective County and City transport strategies to 2026 alongside short term implementation plans.” [Delete remainder of paragraph, including list of objectives and bullet points]</p>
2063/411	CHRIS FREEMAN DESIGN LTD	The transport policy takes no account of sustainable options of personal transport in the form of any option other than foot or bicycle	<p>The real opportunity for individuals to use electric vehicles charged on green energy tariffs or by photovoltaic panels, for instance should be included. This is an area which is being pursued by real world individuals and is ahead of the core strategy proposal before it is even adopted. This would allow development in rural areas outside towns and rural centres as any location could be deemed sustainable with such measures in place.</p>
2073/451	Leicester Diocesan Board of Finance/Carr/Bowie/Murmann/Jo	Overall the policy is sound but fails to recognise the positive benefits of existing infrastructure, notably the A6 bypass at Great Glen. Whilst other settlements such as Kibworth and Lutterworth (para 5.48 refers) will not have new bypasses, Great Glen has the benefit of this key infrastructure and this should be recognised and used for its economic and social benefits, and the opportunity it affords to accommodate beneficial development and services.	<p>In effect policy 5 supports the location of further development at Great Glen. However, this should be identified in the supporting text by specific reference thereto.</p>

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2081/513	Bitteswell Parish Council	The statement of objectives in this paragraph is strongly supported. However, its implementation cannot be realised in the absence of additional funding which, unfortunately, is unlikely to be forthcoming in the foreseeable future.	
2081/514	Bitteswell Parish Council	Whilst acknowledging that the proposal for an eastern bypass of Lutterworth has been described as an 'aspiration', is the despondent claim of the District Council that it cannot be delivered before 2026 a view formally endorsed by the Leicestershire County Council Highway Authority?	
2081/515	Bitteswell Parish Council	Strategies directed to securing a reduction in the number of traffic signs, without compromising road safety, would be strongly supported by this Council. If this is a definite goal of the District Council it should seek to promote a District-wide and systematic examination of all traffic signs to assess their need against a set of criteria agreed with the Highway Authority. Likewise, funding for this exercise will be an obstacle.	
2081/516	Bitteswell Parish Council	The statement in paragraph 5.53 appears to be predicated on the view that in rural areas there is a surplus of local services for which there is not a matching demand; and that this could be resolved by the establishment of new development which would increase the population thereby creating an elevated demand. The reality is that in most rural areas there is an inadequate level of services to satisfy the local demand. Thus, the false premise underlying the subject statement should not be construed as a justification for development.	
2085/566	Natural England	Natural England supports this policy as we encourage alternatives to car based transport as it will help tackle climate change by cutting down on carbon emissions. We are particularly supportive of the provision of footpaths and cycleways which will contribute to sustainable transport and also provide informal recreation opportunities to help improve the health and well-being of residents.	

Policy 6 Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
3438/28	Cllr M Rook	Policy 6 (along with Policy 7) is key to the next years success of the District. I support the proposals and broadly agree the development volumes in this policy. The sequential approach for outlying development is supported, and the area is defined by its Market Towns and emerging urban identity, which do pull in visitors from other regions by virtue of community, independent retail offer, amenities and secure environment.	
3590/210	Claybrooke Magna Parish Council	Currently not the need as defined here. Development should be sustainable and therefore has to be considered. Furthermore Broughton Astley is not sustainable as a key centre as its facilities are not good enough. In fact the whole housing policy is unsound because it does not correspond to the population composition and needs.	Structure the sustainability around facts and determine the requirements accordingly.
2040/227	Westleigh Developments Ltd	<p>The designation of Broughton Astley as a District scale centre is supported. Paragraph 5.65 recognises that the village does not have a range of shops and services commensurate with its population and that it needs to become sustainable in terms of its retail offer and its local services and facilities. The Council's commitment to improving facilities in Broughton Astley is recognised, however, this should be explicitly set out in the text to Policy 6 as an improved retail and leisure offer would support the social and economic well-being of the village and reduce travelling for food shopping and for leisure.</p> <p>Paragraph 2.26 advises that Broughton Astley has very limited shopping/business facilities in the village centre and clearly, the development of the Coventry Road site for new retail, leisure and commercial uses as outlined in the accompanying promotional document would address the issue which has been identified in a sustainable way.</p>	Include a specific reference to new retail development on sites close to the village centre within the text of policy 6, recognising the difficulties in accommodating further growth within or adjoining the existing Principal Shopping and Business Area that is defined in the Local Plan.
2046/260	SAINSBURYS SUPERMARKETS	<p>Policy 6 sets out the quantum of additional retail floorspace required in Harborough over the plan period of 13,800sqm of additional comparison floorspace and 7,800sqm of additional convenience floorspace. This representation raises objection to the inclusion of specific floorspace figures with the Policy as it is not sound and justified in accordance with PPS12. In its current form, proposed Policy 6 is unduly prescriptive and inflexible, given it does not provide any scope for increased amounts of floorspace which may be identified by future updated retail capacity assessments. These concerns are similar to those expressed by the Planning Inspector appointed to critique the soundness of the South Kesteven Core Strategy DPD; in his Report, following the EiP, he recommended the removal of specific retail floorspace figures from the DPD, on account of it being " ... insufficiently flexible to respond to changing needs for retail and other town centre uses".</p> <p>A similar recommendation was also made by the Inspector appointed to consider the Redcar and Cleveland Core Strategy, which recognised at paragraph 5.11 that " ... there does not appear to be any great benefit in setting a strict numerical limit on the quantity of retail floorspace in the new centre; that would unduly reduce the flexibility of the strategy". For this reason and given likely changes in circumstances up to 2026, it is unduly inflexible to include reference to these figures.</p>	SSL seeks the deletion of the retail floorspace figures, thereby allowing scope for any future retail studies and planning applications to identify additional retail capacity. This will make the policy compliant with PPS12.
2051/310	The Theatres Trust		We are disappointed that Policy 6 makes no mention of improving town centres other than by the retail offer although the last paragraph 5.67 states that there is strong support for a cinema in Market Harborough. This town has a theatre and the District is fortunate to have it and, in our opinion, this fact should be acknowledged in the document and support given for its

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
			continued existence.
2055/345	Leicestershire County Council	Para.5.55: The text does not draw out the fact that both Lutterworth and Broughton Astley are classed as Key Centres but in terms of retail hierarchy, Lutterworth is a town centre, whilst Broughton Astley is a district scale centre.	Clarify the different classification of settlements.
2055/346	Leicestershire County Council	This Policy does not appear to promote the greater provision of facilities in Broughton Astley. This has a bearing on the suitability of Broughton Astley as a location for further significant housing development.	The Policy should be strengthened to justify the Key Centre designation, perhaps by setting a target as well as for Market Harborough and Lutterworth.
2055/347	Leicestershire County Council	Para.5.61: The wording is unclear and over-technical in its reference to retention rate.	Clarify the wording.
2055/348	Leicestershire County Council	The aspiration to enhance Lutterworth's comparison retail offer is supported.	The role of further housing growth in supporting existing and future retail opportunities within the town should also be recognised.
2008/38	Blaby District Council	<p>In Table 9 – Harborough District Retail Hierarchy, Blaby has been classed as a 'District Centre', whereas it should be classed as a 'Town Centre'. A Blaby Town Centre Masterplan has been developed to guide the future development of the Town Centre, and there is a policy covering Blaby Town Centre in the Blaby District Council Core Strategy Submission Version (July 2009).</p> <p>In addition to this, there is no mention of Fosse Park in the retail hierarchy. This is partly understandable in that it doesn't fit easily into any of the existing categories. However, given its sub-regional significance and its large catchment area, Blaby District Council considers that it should be included in the hierarchy. Perhaps another category could be created to include sub-regional out of town centres.</p>	<p>In Table 9 – Harborough District Retail Hierarchy, Blaby has been classed as a 'District Centre', whereas it should be classed as a 'Town Centre'. A Blaby Town Centre Masterplan has been developed to guide the future development of the Town Centre, and there is a policy covering Blaby Town Centre in the Blaby District Council Core Strategy Submission Version (July 2009).</p> <p>In addition to this, there is no mention of Fosse Park in the retail hierarchy. This is partly understandable in that it doesn't fit easily into any of the existing categories. However, given its sub-regional significance and its large catchment area, Blaby District Council considers that it should be included in the hierarchy. Perhaps another category could be created to include sub-regional out of town centres.</p> <p>This policy will be sound if the above amendments are made, to ensure that the context in which the policy has been developed (ie, the retail hierarchy) is accurate.</p>
2081/517	Bitteswell Parish Council	Lutterworth experiences a high level of passing traffic, much of which is HGV. However, as Lutterworth has a large, thriving and nationally prominent supermarket, Morrisons, and a competitor, high-quality, supermarket has decided to establish in the Town, it is suggested that the claim that traffic impairs the 'vitality and viability' of Lutterworth may be more myth than fact. The claim is in need of critical appraisal in order to verify the truth of the matter.	
2081/518	Bitteswell Parish Council		Fosse Park and Grove Park Triangle strongly influence the retail shopping patterns of many residents of the Harborough District. Although it is recognized that this may require the creation of a new category H, should not these and perhaps other 'out of town' locations be represented in Table 9?
2081/519	Bitteswell Parish Council		This paragraph refers to the District Council's support for the protection of neighbourhood shopping provision. As it could be argued that convenience retailing is the service in most demand in small settlements, it is suggested that the scope of Policy 6 is amended to specifically recognize this need and explore the means by which such provision could be encouraged.

Policy 7 Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
3438/29	Cllr M Rook	I support the development outlined in Core Strategy 7. Employment is the driver for the wealth creation, happiness and security of community, and education. This policy underpins the support to business and wealth creation, and I have no issues with any of its sub paragraphs a to k, but the march to rail should not be a barrier to business development anywhere.	
2027/126	Mr T Smith	Policy 7 (i): This policy paragraph has appeared out of the ether. It has not been the subject of any local consultation or any community involvement. The LDS and consultation firmly say that site allocation will be considered in a specific document rather than parachuted into the Core Strategy. The Sustainability Appraisal does not consider this site specific allocation where there are very clear and widely appreciated sustainability issues. The SA considers there are no negative implications from Policy 7 despite known harm perpetrated by motor vehicle research at the airfield. The policy is allocation is not justified at all anywhere in the plan and fails to consider Planning guidance which seeks to protect the countryside for its own intrinsic merits. This particular insertion is not justified at all in supporting text. Without SA impacts, implications and the consideration of this sites duplication of sustainable motor research facilities operating, this insertion is unjustified. The Policy has no justification or explanation which demonstrates the sustainability of the proposed use. The Plan preparation has not followed the process described in PPS12. There has been no community involvement nor sustainability appraisal of the site allocation. The Policy makes no reference and fails to consider current planning policies in the development plan saved to continue to effect control over harmful uses at the airfield. In particular the compliance of the site in terms of limiting PD rights where these result in harm and noise.	The Policy paragraph should be deleted.
3677/156	CYO Seeds	CYO Seeds supports the general principles of Policy 7: Enabling Economic and Business Development. The review of existing employment sites and allocations in the District in the Allocations Development Plan Document (DPD) as set out in point d) is supported, as too is the designation of Key Employment Areas as set out in point e). The identification of criteria in the Allocations DPD for the relocation or expansion needs of current employment activities as set out in point f) is also welcomed. Whilst it is recognised that CYO Seeds is located in a rural village, it is considered that the importance of the business to the local economy should be recognised through the allocation of the site as a Key Employment Area. Furthermore the business should be able to expand and grow in its current location; the small parcel of land to the east of existing site should therefore be allocated. Representations to this effect will be made to the Allocations DPD.	Whilst it is recognised that CYO Seeds is located in a rural village, it is considered that the importance of the business to the local economy should be recognised through the allocation of the site as a Key Employment Area. Furthermore the business should be able to expand and grow in its current location; the small parcel of land to the east of existing site should therefore be allocated. Representations to this effect will be made to the Allocations DPD.
3675/163	C Walton Ltd	Planning Policy Statement 12 – Creating Strong Safe and Prosperous Communities through Local Spatial Planning (“PPS12”) sets out the tests of soundness at paragraphs 4.50 to 4.52 inclusive. The Core Strategy should be “Justified, Effective and Consistent with National Policy” in order to be sound. In order to be “Justified”, the document must be founded on a robust and credible evidence base; and the most appropriate strategy when considered against the reasonable alternatives In order to be “Effective” the document must be deliverable; flexible; and able to be monitored. As currently drafted, policy 7i limits support to renewing premises and upgrading the environment of the main employment area. Therefore, it would preclude the development of new buildings that were consistent with national policy, for example in PPS4, and proven to be appropriate for, and sustainable in, this location. Accordingly, policy 7i is overly and unreasonably restrictive. It cannot be said to be “flexible” and cannot be deemed to be the “most appropriate” strategy. As such, the policy cannot be deemed to be either “effective” or “justified”.	There is no objection to the first sentence of policy 7i, which should be retained. The second sentence should be amended to allow support for appropriate development including new buildings for research and development use.

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		<p>It should be noted that saved policies EM16-23 and expired policy EM24 of the 2007 Harborough Local Plan allowed for appropriate new builds, albeit subject to certain restrictions.</p>	
3665/169	Mr & Mrs Crane	<p>This policy is too focussed on employment development in Market Harborough which consequently does not address the needs of other areas within the District. With regard to Key Employment Areas there is too much emphasis on protection and renewal of existing employment locations and upgrade refers only to the environment of employment areas. There is no provision for growth and expansion of employment areas, save than to compile a portfolio of sustainable sites. The explanation as to what makes a site “sustainable” is too narrow and focuses too much on accessibility by public transport. This would have the effect of limiting development outside of market Harborough therefore this would not address the needs of other areas within the District. It is essential, particularly in the current economic climate, that the development of employment land is flexible and appropriate for those it intends to serve. Business accommodation must be provided for in the smaller towns, villages and rural areas that will suit local businesses of all sizes whether they are startup companies looking to expand or established companies who are downsizing/reducing overheads whilst trying to maintain their workforce through the downturn. A flexible approach to local employment is important to the community, the local area and the district as a whole. This view is supported by national policy, guidance and recent Government commissioned studies. Living Working Countryside: The Taylor Review of Rural and Affordable Housing found that opportunities for rural businesses are not always being adequately supported by the planning system meaning that rural communities are failing to fulfill their economic potential. Supporting economic development in the countryside will help address low wages and impact on the national economy given that millions of people live and work in the countryside, and tens of thousands of businesses are based there. The report saw “an opportunity to help rural businesses deliver far more for the economy locally and nationally, rejuvenate rural communities, and so increase their environmental, social and economic sustainability”. The report also identified a number of barriers faced by rural businesses. These include: • a lack of appropriate premises, • extremely limited scope for expanding or modernising existing premises, • inflexibility within the planning system towards growth based on a misperception of what is and what is not ‘sustainable’. In summer 2008 Stuart Burgess, the Rural Advocate, published his Government commissioned report on how rural economies might be further strengthened in England’s rural areas: steps to release their economic potential. This set out a package of proposals with 21 recommendations to improve support for people and enterprises in rural areas. The Government’s response welcomed the recognition of the significant economic contribution already made by rural areas as well as the potential for their continued growth. The Environment secretary Hilary Benn pledged government support for rural communities and businesses to help them cope with the economic downturn and agreed with Burgess that rural areas should not be artificially constrained by out-dated and nostalgic assumptions; the Government’s approach to economic development should recognise the dynamism, interconnectedness and value of our current rural businesses. Part g) does not adequately address the needs of rural areas in line with national policy and guidance. This policy should support economic development in the countryside even where it is traditionally viewed as ‘unsustainable’ (for example, only accessible by car). The policy should recognise that allowing economic development in rural areas will lead to greater demand for services such as public transport and local shops. This will lead to support and expansion of existing services and potentially the provision of new services therefore ending the cycle of the ‘sustainability trap’. With regards to the review of employment sites, market attractiveness is only one of the criterion proposed to assess sites and does not appear to have been given a high priority. This is surely the most important factor in determining the future of an employment area since without occupier demand viability is impossible and an employment location will fail, regardless of the accessibility and sustainability of the location. This element of</p>	<p>Part g) should be rewritten to reflect PPS4 which supports employment development on the edge of existing settlements where employment, housing (including affordable housing), services and other facilities can be provided close together, the conversion of rural buildings, replacement buildings in the countryside, as well as retention of services, farm diversification and equine enterprises. At the very least the words “only” and “worthy of retention” should be removed since this is not in accordance with national policy. Part k) should apply to all employment sites, not purely Magna Park. Paragraph 5.73 should be amended to reflect the support of employment development in rural areas contained in PPS4.</p>

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
		<p>the policy is therefore not effective. This policy is not in accordance with PPS4 which seeks to encourage development of new employment locations both in urban and rural areas. The previous Core Strategy consultation was undertaken under the provisions of PPS7 but since this time, the employment elements of this have been deleted and employment is dealt with within a single PPS4. This has had the effect of removing the distinction between approaches to employment in rural and urban areas and ensuring that they are now treated equally. Through having a different policy approach to rural areas and Market Harborough the Core Strategy is not in accordance with National Policy. Part g) also restricts re-use of rural buildings far in excess of the restrictions held within National Policy. PPS4 simply states that it supports “the conversion and re-use of appropriately located and suitably constructed existing buildings in the countryside” with no requirement for them to be worthy of retention. There is also no national requirement for new employment to be linked to the retention of rural services, land based business or agricultural diversification.</p>	
2038/190	Langtree Group PLC	<p>Langtree Group are supportive of Policy 7. Section (F) within Policy 7 sets out that that proposals to renew or upgrade the environment of employment areas not identified as ‘key employment areas’ for continued employment use or for alternative mixed or non employment uses should be supported.</p> <p>PPS 4 states that Councils should prioritise previously developed land which is suitable for re-use and where there is no reasonable prospect for an employment use to be continued, and should not retain the use, but should consider wider economic or alternative uses. The Core Strategy is therefore in line with the requirements of PPS 4 and is appropriate in this context. It is stated within the Policy that criteria will be identified in the Allocations DPD and will include consideration of appropriate evidence, net reduction, and amenity and character of adjoining land. We would suggest that the criteria should be applied flexibly to ensure that development is not restricted and ensure that sites can come forward for development. The document could be considered unsound if it restricts development.</p>	Allow for criteria to be applied flexibly to ensure that it does not restrict the potential for sites to come forward.
3590/211	Claybrooke Magna Parish Council	<p>How can Magna Park have a sustainable transport mode????? It is totally in the wrong place!!!!!!</p> <p>Also again, the policy does not correspond to reality. The Population characteristics do not correspond with the objectives for employment development and are therefore deemed to fail and again will not drive the necessary improvements in sustainability. A sustainable society needs its work local to minimise travel. The way this policy is set out misses this completely because the work available will not suit the workers and so they will have to travel.</p>	Policy needs to heed the population composition and the advice provided in previous work.
2040/229	Westleigh Developments Ltd	<p>The aim of enabling economic and business development is supported, however, the allocation of only 5 hectares of additional employment land for Market Harborough with no provision for Lutterworth or Broughton Astley (the designated Key Centres) is considered to be overly restrictive and unambitious. It is difficult to see how the strategic objective of supporting development for additional employment development set out in Policy 1 can be met with such a restrictive overall target and no provision for two sustainable settlements to support their development for additional employment development.</p> <p>The provision of 5 hectares of additional employment land for the plan period is justified by the HELS despite the fact that 12 hectares of additional employment land was developed per annum between 2001/2 and 2007/8 (see paragraph 2.21 of the Core Strategy document).</p> <p>The text of policy 7 is contradicted by that contained within paragraph 5.72 which states that sequentially, locations within or adjoining Market Harborough, Lutterworth, Broughton Astley and the Rural Centres (rather than just Market Harborough) would be preferred to minimise travel</p>	Amend criterion b) to suggest the allocation of additional employment land in Market Harborough, Lutterworth, Broughton Astley to meet the strategic objectives of Policy 1 of the Core Strategy.

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3610/261	Gazeley UK Ltd	<p>between homes and jobs.</p> <p>Magna Park is a dedicated distribution facility of regional, national and European significance. Development to date amounts to c.8.5 m sqft and provides employment for c. 6,500 people. Policies 7(j) & (k) are opposed to any further phase of development which is inconsistent with the significant under supply of land for warehousing noted in the explanation for the policy at para 5.70. The policy takes no account of the East Midlands Strategic Distribution Study which is one of the most relevant authoritative analyses of this sector in recent years and which also demonstrates a shortfall of land for distribution warehousing. Other evidence has been submitted by Gazeley to substantiate the existing shortfall of land for new distribution development but this has been ignored by the Council. Gazeley has demonstrated a continuing demand for the type of accommodation provided at Magna Park which is being excluded by the Council's opposition to a further phase of development. For these reasons the policies are not justified or effective. Policies 7(j) & (k) are inconsistent with national planning policy as set out in PPS 4 - "Planning for Sustainable Economic Growth", notably policies EC1, EC2, & EC10. As a result the Core Strategy fails to proactively encourage sustainable economic development contrary to the evidence which is available, it fails to accommodate a business sector which is acknowledged to be experiencing continued growth, it does not allow for the expansion of an existing business cluster at Magna Park and does not provide for a key distribution network. The Core Strategy is inconsistent with national planning policy as it appears in PPG 13 "Transport" and in particular in relation to the advice contained therein regarding the allocation of sites for freight use. Policies (j) & (k) fail to have regard for the policies of the Department of Transport set out in "Delivering a Sustainable Transport System: The Logistics Perspective". Policies 7 (j) & (k) are inconsistent with policy 21 of the East Midlands Regional Spatial Strategy which, at the time of writing, a decision maker is legally obliged to take into account.</p>	<p>The Core Strategy should be amended to indicate that a further phase of up to about 40 hectares (100 acres) of development at Magna Park will be supported. We propose that given the strategic scale of such development and the desirability of co-locating with other uses which generate substantial transport movements, it would be appropriate to make specific reference to this in the Core Strategy, whilst the detailed development control requirements including strategic scale landscaping and other environmental measures could be addressed in the forthcoming Allocations DPD. It is further proposed that the additional phase of development at Magna Park should be carried out in association with measures which will encourage the movement of freight from the entire Magna Park site to the nearby DIRFT multi modal terminal to make use of the rail network in accordance with national policy. This change is necessary to meet the shortfall of land for future distribution warehousing development identified by the Council and amplified by others and to accommodate sustainable economic development and in particular the needs of the freight sector highlighted in national planning policy.</p>
2047/262	Hallam Land Management Ltd	<p>I welcome the proposal to allocate 5ha of land at Market Harborough for employment uses. This will ensure that the growth of housing is linked to employment development and the ability of businesses in the town to regenerate existing employment sites and locate to sites which best meet their future needs. However Policy 7 lacks justification and effectiveness on two counts:</p> <ol style="list-style-type: none"> 1. It does not specifically direct all of this strategic employment growth solely to land adjacent to the North Western Strategic Development Area (SDA) known as Airfield Farm which I consider to be the most appropriate location for new and future employment development in the town. We have recently celebrated the turf cutting for the new Harborough Innovation Centre and in time, the Airfield Business Park will be developed further. However, I believe that the Harborough Innovation Centre would be best supported long term in a location which is the focus for Market Harborough's business community and a place with a good reputation for technology and innovation. I feel that these objectives would be best served by locating all of the employment development to this SDA, adjacent to Airfield Farm. I therefore seek that Policy 7 is made more robust in this sense, reflecting a clear direction to future growth in the most sustainable location which will benefit from highly sustainable modes of transport. 2. The 5ha quantum of employment growth does not take into account the opportunity for relocation of civic organisations to new premises within the plan period. An additional 5ha of employment land creating a 'Public Buildings Quarter' would see benefits from creating a cluster of civic buildings located in a single area, accessible to the public with opportunities for shared facilities and services. The required 10ha of land is available and deliverable, being within the ownership of both Hallam Land Management Ltd and William Davis Ltd, the landowners of Airfield Farm. 	<p>Revise Policy 7 part b to read: Allocate 10 ha of new land for employment uses adjacent to the Strategic Development Area known as Airfield Farm to the North West of Market Harborough. This will include 5ha to offset potential future losses and meet needs beyond 2021 plus an additional 5ha of land for creating a 'Public Buildings Quarter' locating public services together in a sustainable location where proximity and ease of access by sustainable modes of transport to the Strategic Development Area will be of particular consideration.</p>

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2054/319	Wheatcroft & Son	<p>We welcome the proposals in point (d) of Policy 7 to review existing employment sites and allocations in the District in order to confirm that allocated sites are sustainable, of the right quality and available at the right time to meet identified need. As we have previously stated in our representations deliverability is the key to a successful strategy. However, we do not support the text in paragraph 5.72 which suggests that sequentially, locations within, or adjoining Broughton Astley will be preferred over those within or adjoining Rural centres.</p> <p>As we have outlined we do not consider it is justified to designate Broughton Astley as a higher tier settlement than the other Rural Centres and therefore we also do not consider it justified to sequentially allocate employment sites to Broughton Astley before the other Rural Centres. Employment sites should be spread across the Rural Centres. Concentration in one or two settlements will not allow sufficient flexibility, for instance for local firms to expand, as the employment land at Market Harborough and Lutterworth is aimed at national or regional firms but not the smaller local employers who need a ready supply of land to accommodate their requirements. With regard to the form of employment development we consider that the Council should take a flexible approach to the type of development allowed on allocated employment sites in order to best meet the needs of the surrounding area and local businesses in order to help protect the viability and vitality of the Districts Market Towns and Rural Centres.</p>	Broughton Astley should be re-designated as a Rural Centre and the sentence within paragraph 5.72 should be amended to remove reference to Broughton Astley as being sequentially preferable to the Rural centres.
2055/349	Leicestershire County Council		<p>The intention to review existing employment allocations is welcomed since it provides an opportunity to respond to changes in circumstances since the adoption of the Harborough Local Plan. It is expected that this review will take account of the evidence included in the Harborough Employment Land Study, which recognised the case for de-allocating or re-allocating four of the District's allocated employment sites, and included land at Leaders Farm, Lutterworth.</p> <p>This site scored poorly in relation to its compatibility to surrounding uses and market perceptions. It is recommended that the site is reallocated for residential uses. This would result in the site becoming deliverable, bringing forward a sustainable site to help meet Lutterworth's housing requirements.</p>
2055/350	Leicestershire County Council	<p>The Policy identifies a range of factors that will be considered when designating KEAs in Market Harborough and identified Rural Centres. It is considered that "accessibility by means of sustainable transport", does not support the principles outlined in Policy EC12.1 of PPS4 - Planning for Sustainable Economic Growth. PPS4 was revised, in part, as a response to Matthew Taylor's Living, Working Countryside and incorporates rural economy element from PPS7. PPS4 makes allowance for development even if the local public transport service is not considered sufficient.</p>	<p>The Policy should take a more pragmatic approach to rural development. Planning officers should work with applicants to understand if there is a likely increase in traffic flows rather than introducing policy statements that could needlessly constrain certain small or home-based businesses. In addition the council should develop a more active role. Not only should it "designate" but there should be added support available through other district council functions.</p>
2055/351	Leicestershire County Council	<p>This Policy will not sufficiently support Harborough's rural economy. It will not deliver against the priorities identified in Para 5.68 - i.e. reflecting the needs of different sectors and recognising the District's rural character. The Leicester and Leicestershire Local Economic Assessment identified that the rural economy is structurally similar to that of the urban economy, with a wide range of businesses represented. Whilst land-based sector businesses (e.g. tourism, environmental protection, food security etc) are significantly important in rural areas there are a significant number of high value homebased businesses which could be supported.</p>	<p>A narrow interpretation of PPS4 has been translated in this Policy, which is too narrowly focused on land-based businesses and the unspecified reuse of vacant and derelict buildings worthy of retention. The Policy should be expanded to support a more accurate definition of the local rural economy and support and unlock the potential of the business base in rural Harborough. Hinckley and Bosworth Borough Council, for example, has developed a Rural Needs DPD which outlines how the authority will support small home-based businesses (e.g. live/work and residential). The Policy could also make clear the types of business development that would be considered appropriate, which should be broader than land-based.</p>

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2055/352	Leicestershire County Council	The Policy to capitalise Bruntingthorpe's "unique rural location" to identify opportunities for the site to support the wider rural economy is welcomed.	It could be enhanced to identify how the services and facilities on-site could support small rural business, including home-based businesses, within the locality. The District Council should identify how key sites can help deliver local business needs - e.g. meeting space, shared resource etc. The district council should have a critical role in brokering these discussions.
2011/47	Limetree Real Estates	<p>(Para.5.72) The aim of enabling economic and business development is supported as is the strengthening of the role of Market Harborough as the principal town in the District. It is considered, however, that the allocation of only 5 hectares of additional employment land for Market Harborough is somewhat restrictive, particularly in advance of a review of existing employment sites and allocations that have not been taken up. The provision of 5 hectares of additional employment land for the plan period is justified by the HELS despite the fact that 12 hectares of additional employment land was developed per annum between 2001/2 and 2007/8 (see paragraph 2.21 of the Core Strategy document).</p> <p>Notwithstanding the above comments, it is considered that the land west of Rockingham Road in Market Harborough would meet the need identified in Policy 7, as demonstrated by the submitted Promotional Document. The site scores well in the HELS assessment and since the preparation of this Document, it has been established, by means of a Flood Risk Assessment, that part of the site is affected by a 1 in 100 year + climate change risk of flooding. Accordingly approximately 5-6 hectares would be available for development. The site is well located in relation to the existing built form of the town and it has the added advantage that traffic accessing the site from the A6 would not need to pass through the historic core of the town.</p>	Amend criterion b) to suggest the allocation of 5 hectares of additional employment land for the development of Market Harborough together with the sum of any unimplemented employment allocations from the Harborough District Local Plan.
2062/405	Ms R Page	<p>There are limited employment opportunities in the district and there is large scale commuting out of the district. There must be more emphasis on attracting knowledge based industries. Further development at Magna Park must be resisted.</p> <p>Statements in the policies are inconsistent in regards to MP and the floor space figures are in correct. There are no height limitation in regards to buildings identified and no reference to light pollution are made.</p>	
2073/452	Leicester Diocesan Board of Finance/Carr/Bowie/Murmann/Joh	The policy and supporting text fails to recognise the economic and social importance of the wider links with adjoining areas, particularly Leicester/Oadby and Wigston as identified in Chapter 2. We have proposed in related submissions that this is an important locational factor with specific benefits and objectives which can be achieved relating thereto. Locationally, Great Glen is uniquely placed to provide comprehensive employment, housing, and community infrastructure, and would meet the objectives of the strategy.	The supporting text should recognise the economic importance of the links between Market Harborough and Leicester/Oadby and Wigston; and similarly the M1 corridor to the west. These are important economic and social determinants in the District as we have suggested in our response to the Spatial Strategy.
2081/520	Bitteswell Parish Council	Although the trend from factories to offices may be dominant, seeking to arrest the rate of this trend by appropriate policies aimed at the positive encouragement of light industry and enterprises entailing 'knowledge-based' jobs to locate in the District would assist in attenuating the mismatch between the skills of the resident population and the available employment opportunities.	
2081/521	Bitteswell Parish Council	Sub-paragraph 5.69 makes clear that no further phase of development or large-scale expansion of the Site, beyond the existing development footprint, will be supported. It is suggested that, by way of explaining the evidence-base for this conclusion, reference be made to the excellent report prepared by officers which was submitted to the LDF Task Panel of 29th April 2010. This report	

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
		set out the reasons why Magna Park is not a preferred candidate for further expansion as a strategic distribution facility.	
2081/522	Bitteswell Parish Council	<p>The statement in sub-paragraph 5.69 (k) includes the phrase: , combine plots or amend the site boundary to accommodate such development may be supported.'</p> <p>This statement is, of course, inconsistent with the declaration in sub-paragraph (j) to the effect that there would be no further development beyond the existing development footprint.</p>	
2081/523	Bitteswell Parish Council		<p>Since its inception the authorized value of floorspace at Magna Park has proved to be an elusive figure. It is noted that the Core Strategy at paragraph 2.22 offers a number of 750,000m2. At the beginning of this year an officer of the District Council provided to this Council a value of 771,119 m2</p> <p>Having in mind that the Harborough District Plan floorspace limit is set at 717,030 m2, it is recommended that Policy 7 prescribes a specific limiting value of floorspace at Magna Park that will remain immutable during the Plan Period.</p> <p>A shortcoming of the Harborough Local Plan is that there is no specific limit set for the height of buildings at Magna Park. The tall buildings at the site plainly create the greatest adverse visual impact. To redress this deficiency it is recommended that Policy 7 include a building height limitation of not greater than the average height of the existing complement of buildings.</p>

Policy 8 Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2024/105	Kibworth Harcourt Parish Council	The Council feels most strongly that the existing APAC to the north of the village should be preserved.	
2025/109	Great Glen Parish Council	The Council wishes to comment positively on HDC's encouragement of this aspect of its policy given the existing involvement and enthusiasm of the Great Glen Community.	The Council recommends promoting the Green Wedge concept and expand it as much as possible around the village to complement the Biodiversity project already existing in Great Glen via its Community WildSpace Group.
3654/584	Cllr S Galton	Green Wedges are unique to Leicestershire and have prevented urban sprawl extending beyond the built up area of Leicester and swallowing up the villages in Harborough close to the City boundary. Green wedges have enabled settlements such as Scraftoft and Thurnby to retain their separate identity and character as well as helping to guide where development takes place. They provide a green \"lung\" into urban areas and serve as an important recreational resource. I understand Green Wedges were supported by the Inspector during the recent examination of the Oadby and Wigston Core Strategy and are therefore consistent with emerging development plan policy in neighbouring districts. Please also see my response on policy 15 for further reasons why this policy meets the test of soundness and should be supported.	None - I believe the policy is legally compliant.
3659/585	Mr A Keshwara	Paragraph 5.89 goes beyond the remit of the Core Strategy. It may reflect a desired approach of the Local Authorities, but it does not refer to all stakeholders with an interest, notably the owners of land and how their views will be taken into account.	Delete Paragraph 5.89
3659/586	Mr A Keshwara	Support the proposed review of Green Wedges, particularly with regard to land to south of Wintersdale Road, Thurnby	
3575/117	Oadby and Wigston Borough Council	With regard to a detailed review of Green Wedge boundaries, the Borough Council would wish to be involved, or at the least consulted, on the review in relation to the Thurnby, Leicester, Oadby Green Wedge which extends into the Borough of Oadby and Wigston and requests that a commitment to this be included in the supporting text to this policy. A joint Green Wedge Methodology exists to guide such reviews which has been developed by all relevant Leicester and Leicestershire Councils.	Set out in representation.
3353/18	Leicestershire Fire and Rescue	Whilst LFRS welcomes the proposals set out in this policy, the document fails to demonstrate how future management of open spaces will be effected. Each year approximately 49% of deliberate fires attended by LFRS involve grass, trees or shrubs in open spaces (this represents approximately 34% of all fires attended). The simple expedient of removing grass cuttings and tree lopings would significantly reduce deliberate ignitions and again provide benefit in terms of community infrastructure savings. Good ongoing management of open spaces would support arson reduction.	Whilst LFRS welcomes the proposals set out in this policy, the document fails to demonstrate how future management of open spaces will be effected. Each year approximately 49% of deliberate fires attended by LFRS involve grass, trees or shrubs in open spaces (this represents approximately 34% of all fires attended). The simple expedient of removing grass cuttings and tree lopings would significantly reduce deliberate ignitions and again provide benefit in terms of community infrastructure savings. Good ongoing management of open spaces would support arson reduction.
2026/123	Compass Group	Paragraph 5.76 of Policy 8 and paragraph 6.58 of Policy 17 clearly state the intention of securing local open space. The document also contains numerous references to the importance Open Space. However it does not provide any direct regulation of these spaces either for the interim period before all the supporting documents are issued or beyond. Policy HS/9 regulates these spaces and is only directly referred to in Appendix 3. The document does not directly state the importance of Policy HS/9 and therefore could be ineffective in regulating the development of	Provide a clear statement that links the intention of the document on important Open Spaces with the existing policies that are intended to support the policy. Clearly reference of include the Proposals Map that defines the Areas of Open Space.

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
		open spaces.	
3570/125	Sport England	<p>The main evidence used to inform this policy appears to be a local open space needs assessment, carried out in 2004. When the Core Strategy is expected to be adopted in late 2011 this evidence will be over 7 years old. We do not consider that this represents an up to date evidence base which has enabled consideration of current issues regarding open space, sport and recreation in Harborough. The 2004 work actually recommends that a Playing Pitch Strategy is undertaken. It is understood that no such assessment is available to inform the Core Strategy and therefore it is not clear how the policy represents the most appropriate strategy for sport and recreation when the issues are unknown. In addition, we do not consider that bullet point 1 of part (c) is sound because it is not consistent with national policy. PPG17 is clear that existing open space, sport and recreation provision should not be built on unless it can be demonstrated that it is surplus to requirements. This requires an assessment of need which we consider is currently absent. The policy seeks to protect and enhance provision of value. It is unclear how 'value' is proposed to be measured but decisions should be made on a basis of need rather than value.</p>	<p>We consider that the existing 2004 evidence needs to be updated and expanded to enable identification of the issues and to facilitate a robust policy which responds to the identified issues. Bullet point 1 should also be amended to change the emphasis from 'value' to 'need'.</p>
2029/131	Davidsons Group	<p>Reference is made in policy 8(b) to Areas of Separation. These are mentioned alongside Green Wedges in the policy, however, it is clear from the Proposals Map that this is a separate and distinct designation. Areas of separation are, however, not defined or their purpose clearly explained within the policy or supporting text and their broad locations are not identified.</p> <p>As explained in our response to Policy 15, the Leicester Urban Fringe is dominated by Green Wedge and areas of separation. It is inevitable that accommodating further development in this broad location will require development to take place in currently protected areas. Indeed, this is implicit in the commissioning of an additional Landscape Character Assessment for the Leicester PUA which focuses its assessment on areas around the urban fringe and their capacity to accommodate development in landscape terms. This is recognised within Policy 8 in so far as it impacts upon Green Wedges (a detailed review of Green Wedge boundaries will take place through the Allocations DPD and this principle is supported).</p> <p>No such principle is established in respect of the separation area, although such a review is equally required to ensure that the housing numbers set out in Policy 2 are deliverable and the policy is flexible. The lack of such provision within the policy renders the Core Strategy unsound because it is not the most appropriate strategy when considered against all reasonable alternatives. The policy should be revised to include define areas of separation and to provide for review of the boundaries of the separation area within the Leicester urban fringe.</p>	<p>The Core Strategy fails to include a review of the boundaries of areas of separation within the Leicester urban fringe and this raises questions about the deliverability of housing numbers and therefore the soundness of the plan.</p> <p>Policy 8(b) should be revised to define areas of separation and to establish the principle for their review within the Leicester urban fringe to ensure that the policy is both effective in terms of facilitating deliverability of housing and justified in respect of being the most appropriate strategy. The proposed changes are considered necessary to make the Core Strategy sound.</p>
2030/137	Hinckley & Bosworth Borough Council	<p>Hinckley and Bosworth Borough Council support the approach taken in relation to green infrastructure. In relation to the green wedge review the Borough Council support the local authority in the preparation of the review in line with the Joint Leicester and Leicestershire Green Wedge Methodology which was formulated in conjunction with Leicester and Leicestershire Districts. This is the correct approach to take as there is evidence of joint working with other District who are signed up to the same approach for the review of the green wedge.</p>	
3668/146	Mr N Renner	<p>We support the green wedge allocations and area of separation allocations. The boundaries are well established and do not need to be reviewed.</p>	
3628/206	Dr K Feltham	<p>A review of Green Wedge boundaries and new Areas of Separation should incorporate protection for the Stoughton Estate, an area of countryside and agriculture between Stoughton and Great Glen.</p>	

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
3639/255	The Woodland Trust	We welcome the inclusion of protection of woodland and the need to increase tree planting and woodland cover. At the Alternative Options stage, we submitted statistics from our Access to Woodland Standard which show that only 2% of people in Harborough have access to a wood of at least 20ha within 4km of their homes. We believe this shows the need for substantial new woodland creation and we would like to see the council adopt a trees and woodland policy or a trees and woodland spd containing clear and ambitious woodland creation targets	
3602/266	Ms C Renner	Green Infrastructure (GI) is considered important to the identity of Harborough, and as such, the maintenance, upgrading and provision of GI is considered important. Particularly in relation to Green Wedges, which are seen as vital to maintain separation between settlements, as well as providing open space for the local community. As such Policy 8B 'Green Wedges' is seen as an important policy and the existing Green Wedge boundaries should be maintained.	
2049/288	National Trust	The Policy is well drafted, it identifies the key multi-functional roles of Green Infrastructure and the potential to achieve more from these key resources; it also properly acknowledges the need to improve bio-diversity and provides an appropriate basis to do this. This is a key policy in the Core Strategy and it is critical that its expectations are not diluted.	
3620/293	Lutterworth Town Council	Lutterworth urgently requires the provision of additional cemetery land as the current burial ground is estimated to be at full capacity in approximately two to four years. Harborough District Local Plan 2001 Policy LW/8 must be carried forward into the Local Development Framework to grant planning permission for a burial ground on approximately 1.2 hectares of land south of Coventry Road. It is understood that this piece of land is owned by Leicestershire County Council and was previously designated as Class B1 development land. This area is more suited to that of residential development due to its close proximity to existing residential land. A burial ground would also combine more easily with residential development than that of light industrial.	No changes necessary but comments above press for firm cemetery land identification within the Local Development Framework.
3620/294	Lutterworth Town Council	Policy 8 concurs with the aims contained within the Natural Environment section of the Lutterworth Town Plan 2010. Significant developments should however be commensurate with allotment provision.	
3646/313	British Waterways	British Waterways (BW) is pleased to see that the list of Strategic Green Infrastructure Assets identified as key priorities includes the Grand Union Canal and the Saddington Reservoir, both of which form part of BW's network within Harborough District. BW agrees that these assets have significant potential to contribute towards securing a high quality, accessible and multi-functional green infrastructure network across the district. We consider that the 6C's Green Infrastructure Strategy (2010) supports this approach and helps to underpin the aims of Policy 8, as well as identifying the importance and potential of the assets referred to above.	
2055/353	Leicestershire County Council	<p>The list of the purposes of Green Wedges differs from the definition in the agreed document "Green Wedge Review Joint Methodology", which sets out the following purposes:</p> <ul style="list-style-type: none"> • Preventing the merging of settlements; • Guiding development form; • Providing a green "lung" into urban areas • A recreational resource; <p>In that it does not refer to 'protection of areas of land which influence the form and direction of development'.</p>	Amend the purposes of Green Wedges to be consistent with the agreed methodology. This would help appropriate extensions of existing Green Wedges or new Green Wedges to be designated in the District's land allocation document.

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2055/354	Leicestershire County Council	Para.5.82: The text should include references to working with neighbourhoods and communities in reviewing Green Wedges	Include a reference accordingly. The County Council will be consulting local communities about green spaces and wedges in their neighbourhoods through the next round of Community Forum meetings, with a view to developing planning guidance to ensure their protection.
2055/355	Leicestershire County Council	Para.5.83: The text should include references to working with neighbourhoods and communities in reviewing Green Wedges	Include a reference accordingly. The County Council will be consulting local communities about green spaces and wedges in their neighbourhoods through the next round of Community Forum meetings, with a view to developing planning guidance to ensure their protection.
2055/356	Leicestershire County Council	Para.5.88: The text should include references to working with neighbourhoods and communities in reviewing Green Wedges	Include a reference accordingly. The County Council will be consulting local communities about green spaces and wedges in their neighbourhoods through the next round of Community Forum meetings, with a view to developing planning guidance to ensure their protection.
2008/39	Blaby District Council	Strategic Green Infrastructure Assets, such as the Grand Union Canal, Rivers Sence and Soar (as well as dismantled railway lines and cycleways and footpaths) are assets of both Harborough District Council and Blaby District Council. Consequently, there are opportunities to develop a common approach to these assets perhaps through joint working. Blaby District Council supports the recognition of the opportunities for joint working with regard to Green Infrastructure in this document. It is considered that this policy is legally compliant and sound.	
2009/40	Cllr G Spendlove-Mason	<p>Whilst endorsing the green wedges proposed at Scraptoft and Thurnby, which are between those settlements and Leicester, there is no mention of a green wedge between the boundary of Great Glen and the Oadby Wigston boundary.</p> <p>An important stretch of green fields currently exists between these two communities. I feel it is a serious omission not to have a green wedge designated here, in order to prevent a ribbon development along the A6 bypass and the route of the 'old A6'. As it stands it provides a welcome breath of fresh air when one reaches the countryside after exiting urban Leicester and Oadby.</p>	<p>Whilst endorsing the green wedges proposed at Scraptoft and Thurnby, which are between those settlements and Leicester, there is no mention of a green wedge between the boundary of Great Glen and the Oadby Wigston boundary.</p> <p>An important stretch of green fields currently exists between these two communities. I feel it is a serious omission not to have a green wedge designated here, in order to prevent a ribbon development along the A6 bypass and the route of the 'old A6'. As it stands it provides a welcome breath of fresh air when one reaches the countryside after exiting urban Leicester and Oadby.</p>
2018/73	Thurnby and Bushby Society	Green Infrastructure, paragraphs 2.30, 2.37, 5.78, 5.91 agree with Harborough Core Strategy Strategic Objective 5.	
2018/74	Thurnby and Bushby Society	<p>Green Wedges and Areas of Separation: The area between Thurnby & Bushby and Scraptoft (the Thurnby Brook Valley) is needed as an area large enough for people and wildlife to serve the eastern side of Leicester. There is no such facility between Watermead Park to the north and Brocks Hill or the Arboretum to the South. The Thurnby Brook Valley already has a network of public footpaths, a stream and a dismantled railway line which has much potential to be managed and enhanced in line with this Policy.</p> <p>It is in line with Harborough Sustainable Community Strategic Vision paragraph 2, and with Harborough Core Strategy Strategic Objectives 4 and 5.</p>	
2062/402	Ms R Page	I agree with the protection of Green Spaces however there is not enough emphasis placed on	

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
		protecting the countryside	
3657/414	Jelson	This section does not provide any description of the role or status of Areas of Separation. As with Green Wedges there is a need to define their strategic purpose and role, particularly given that there appears to be considerable overlap with the first function of Green Wedge (i.e. preventing the merging of settlements). As with Green Wedges it should also be made clear that the review of the boundary of Areas of Separation will be undertaken.	
2065/427	Trustees of the Bushby Settlement c/o Mather Jamie	Policy 8(b) Green Wedge The proposed detailed review of Green Wedge boundaries through the Allocations DPD is supported and is considered to be necessary in the context of the Leicester urban fringe to ensure that the development requirement for this part of the District can be delivered. The proposed review is also consistent with the evidence base and the most appropriate strategy when considered against the alternatives. This part of the Core Strategy is therefore considered to be sound.	
2068/439	Leicestershire and Rutland Wildlife Trust	Paragraph 5.87 makes no reference to the need to protect the biodiversity value of Green Wedges	Suggested rewording to paragraph 5.87 "fundamental to their success is the need to protect their open and undeveloped character and biodiversity value through the prevention of inappropriate development" Suggested change to 5.90 "Outside the Leicester urban fringe, existing and new Separation Areas will be the focus for GI investment so long as their open and undeveloped character and biodiversity value is not jeopardised".
2068/440	Leicestershire and Rutland Wildlife Trust	Paragraph 5.87 makes no reference to action by Harborough District Council.	Suggested rewording of paragraph 5.84 "This approach will be implemented by the Council working with other partners (Stepping Stones Project, neighbouring local authorities and environmental protection groups) and private sector developers"
2068/442	Leicestershire and Rutland Wildlife Trust	Only limited ecological survey work has been undertaken to date comprising assessment of areas adjacent to existing urban settlements within Harborough District. There will be areas of biodiversity and geodiversity interest that have not been identified due to the lack of a comprehensive survey covering the whole of the district.	Suggested rewording of paragraph 5.79 section d) Biodiversity and Geo-diversity Assets "through the systems of the development control, grant aid, management agreement and positive initiatives, the Council and its partners will: Identify, protect and manage the District's biodiversity and geo-diversity"
2076/462	Compass Group Great Bowden	I could not find a direct link for cemetery provision. Cemeteries are a part of what we are catering for the unexpected in this life. Paragraph 5.91 is titled Open Space, Recreation and Sports Provision. Cemeteries also require highlighting within this document and to be clearly stated as in the contents section.	
2076/463	Compass Group Great Bowden	DEFRA provided access through grazed pasture between the remains of the disused old railway line (along Welham Lane, Market Harborough) which was managed by Natural England. Access ends 30 Septemeber 2012. Part of this land has been released now occupied with a barn, chalet, storage for fodder, housing, livestock. The fishing lake has been there for a long time but further along this lane we have other activities involving storage of various forms and sales of eggs etc. Is this open pasture destined for more of this?	The text should identify this area as to its experimental or the long term policy for the Green Wedges, the Green corridors such as have in this Welland Valley, and advice of the constraints that apply to occupiers of this land. This is a special area for all of we locals and visitors who enjoy our countryside.
2081/489	Bitteswell Parish Council	The Core Strategy presents many sound proposals for the protection of green space and enhancing green infrastructure. However, in so doing it appears to not fully acknowledge the intrinsic value of the countryside and greenfield land or express the need for it to be protected for its own sake.	

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
		<p>Greenfield land is a unique and irreplaceable asset. Among other things, it is capable of producing crops and supporting animal husbandry. Both of these attributes assume greater importance when account is taken of climate change; the divergence between the capacity of the planet to produce food and increases in global population, and other pressures that will constrain nations to be more self sufficient. Thus, it is recommended that, despite the so called 'sequential approach to development', the Core Strategy include explicit provisions that safeguard greenfield land rather than exhibiting the narrow view that it is merely a poor asset to be surrendered whenever there is a putative demand for dwellings.</p>	
2081/524	Bitteswell Parish Council	<p>The recognition in this Policy of the importance of open space is welcomed. However, the omission of the statement that the countryside should be protected for its own sake should be corrected. With the aim of ensuring that the present inventory of open space is not further diminished, it is recommended that this Policy should provide to developers clear direction on affording allowances in all development proposals for open space of a level commensurate with that in the environment in which the development is proposed to take place.</p>	
2081/525	Bitteswell Parish Council	<p>Experience has shown that a systematic mechanism for the erosion of open space within settlements has arisen from permitting the construction of a dwelling within the curtilage of an existing property, colloquially known as 'Garden Grabbing'. The Coalition Government in its initial announcement 'Our Programme for Government' declared its intention to give councils new powers to stop 'Garden Grabbing'. Accordingly, in the exercise of these new powers it is recommended that Policy 8 includes a clear prohibition of 'Garden Grabbing' in the Harborough District.</p>	
2085/567	Natural England	<p>Natural England's strongly supports this policy. Our position on the provision of green infrastructure is that it should be an integral part of the creation of sustainable communities throughout England. Networks of multi-functional greenspace should provide a wide range of environmental and quality of life benefits that should be identified in local plans and designed into all major new development and regeneration schemes from the outset. We would wish to see an overall net gain in green infrastructure and the encouragement of development proposals which improve the quality and quantity of accessible green space, where appropriate. We consider the expansion and enhancement of green infrastructure as a valuable multi-purpose resource should match the levels of growth and investment in the built environment within the District and is a fundamental and integrated element of the land use strategy. We consider that this policy is compatible with our own position on this issue.</p> <p>It is essential that Green Infrastructure is planned, delivered and managed in a co-ordinated and consistent manner across the District, with an appropriate level of investment and provided alongside other infrastructure, from the outset. We therefore welcome the identification of Strategic Green Infrastructure Assets as it is important to identify the broad areas of green infrastructure provision at an early stage in the planning process.</p> <p>We particularly welcome the recognition that green infrastructure can be an important resource for wildlife especially in the adaptation to climate change. We support the recognition that by encouraging the expansion of the green infrastructure network that the potential to create and enhance wildlife corridors and networks and the rebuilding of fragmented habitats through conservation management is greatly increased. This approach is consistent with the guidance set out in Planning Policy Statement 9: Biological and Geological Conservation.</p>	

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
3519/61	Mrs G Hill	I think that the continuation of this green wedge between Scraftoft and the City is good to keep this boundary and associated green space for the future.	
3518/62	Mr G Hill	We support this policy and consider it beneficial to the local community to maintain this historic separation at this boundary for future generations.	

Policy 9 Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2021/92	East Midlands Housing Group	We support the principle and approach identified including use of brownfield / previously developed land.	
2031/140	Foxton Parish Council	Para.5.98-5.100: Unsound because it concentrates too much on vague statements and doesn't lend sufficient weight to technologies that are known to be effective, consistent and efficient. The overall effect will be to allow energy company development in beautiful areas of countryside, with guaranteed profit from subsidies, rather than encouraging more effective technologies.	We believe there should be more legislation incorporated into building regulations to ensure that all new developments (industrial, commercial or residential) provide a minimum amount of their own power by inclusion of air and ground heat exchange pumps, photovoltaic roof tiles and solar panels. This will reduce demand on the National Grid and reduce carbon output. For applications for larger, energy generating developments: considerable weight should be attached to applications for proven, efficient technologies for energy generation that do not deface the countryside – not those that merely provide the developer with subsidies for intermittent and unreliable energy production.
2036/183	William Davis Limited & Hallam Land Management Limited	<p>We recognise the importance of minimising energy demand and maximising use of renewable sources, in order to contribute towards commitments in the Climate Change Act 2008. However we consider that policies designed to address climate change need to be well evidenced and viable, otherwise they will inhibit the potential for the very developments that would contribute towards these objectives. Language used in the policy should also be well defined, so as to give a level of certainty to the requirements set out.</p> <p>Whilst the evidence base document 'Planning for Climate Change Assessment' (2008) suggested some broad targets for the district, it lacked any robust assessment of viability, based on the developments likely to come forward in the district. The Planning & Climate Change Supplement to Planning Policy Statement 1 (paragraph 26(i) guides that local authorities should only set out a target percentage of the energy to be used in new development to come from decentralised and renewable or low-carbon energy sources where it is viable. However this is on the basis that there is an evidence based understanding of viability. The Planning & Climate Change Supplement also suggests (at paragraph 26) that this evidence base should be developed working closely with industry. There has been no significant consultation with the development industry with regard to the viability of implementing a target percentage. As such Policy 9 is unjustified as it is not based on evidence of participation of the local community and others having a stake in the area. It is also unsound because it does not reflect the national policy requirement set out target percentages where they are viable and based on an evidence based understanding of viability.</p> <p>We find criterion (d) of the policy overly prescriptive and unrelated to any robust evidence base. The Planning for Climate Change Assessment (2008) does not provide facts upon which to base decisions about the viability of the policy and therefore Policy 9 is not justified and is unsound in this respect. There is no need for the policy to be so prescriptive in order to fulfil national and regional requirements to promote and encourage renewable or low carbon energy generation. The Planning for Climate Change Assessment (2008) set out a number of definitions of 'Zero Carbon'. The exact meaning of Zero Carbon is yet to be defined by Government and it is not defined in Policy 9. Similarly, there is a lack of clarity surrounding Code Level 6 and whether this can actually be delivered. The evidence base does not exist to support the delivery of Code Level 6 in Harborough district within the timescales specified.</p> <p>We would ask for flexibility in the Core Strategy, in order that commitments to tackling climate change can be made at a stage when evidence has been developed to demonstrate that those commitments are viable, either through planning applications or SPD. We would suggest that the</p>	<p>Delete the following text from Criterion (d): as follows:</p> <ul style="list-style-type: none">i. all residential developments are encouraged to meet the minimum standards of the Code for Sustainable Homes program (i.e. all new dwellings to meet Code Level 6 requirements by 2016);ii. non residential developments will be required to meet a BREEAM (or equivalent) assessment rating of 'very good'. From 2016 this will increase to an assessment rating of 'excellent';iii. the provision of on-site or decentralised renewable energy systems will be encouraged on non-residential developments of 1,000 square metres and above. Such systems should provide a minimum of 10% of a site's total energy requirements. <p>The above amendments would make Policy 9 sound because they would remove the elements of the policy which are not based on sound evidence, taking into account viability, and are therefore not justified by national planning policy.</p>

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
		onus is placed upon developers to demonstrate how they have considered opportunities for sustainable construction and renewable energy generation, such that proposals can be individually assessed in terms of their appropriateness and viability.	
3631/221	Dr K Feltham	Policy for addressing climate change is sound and should encourage the use of more sustainable materials and construction methods.	
2040/230	Westleigh Developments Ltd	Policy 9 seeks to address climate change by reference to a number of measures including by prioritising derelict, vacant and underused land for development and requiring non-residential developments to meet the BREEAM very good standard and to provide 10% of their energy requirements via on site or decentralised generation. The fundamental importance of this issue is recognised. The development of this former golf driving range and course on which development commenced in the late 1980s/1990s would improve its run down appearance and favour a previously developed and underused site for development. It is also intended that Westleigh would redevelop the Coventry Road site in accordance with the enclosed promotional document, in compliance with the requirements to meet the BREEAM very good standard and to provide 10% of their energy requirements via on site or decentralised generation. This is something that the developer is committed to and has previous experience of undertaking successfully.	
3613/279	Billesdon Parish Council	Paragraph 5.101 provides no timescale or targets for the reduction in CO2 emissions for the District.	Provide a statement on timescale and targets for the reduction in CO2 emissions for the District.
2049/289	National Trust	Having regard to the Supplement to PPS1 this is a critical element of the overall Core Strategy. National Trust considers the Policy to be well drafted and to appropriately provide a local, Harborough-level, response to the challenges of reducing the effects of climate change and adapting to those that are now unavoidable.	
2050/304	William Davis Ltd	<p>Policy 9(d) requires that all residential developments are encouraged to meet the minimum standards of the Code for Sustainable Homes (CSH). Currently the CSH is not a mandatory requirement and is optional for developers on residential schemes. Consequently the encouragement of the CSH standards could be seen as being inconsistent with national planning policy and therefore unsound.</p> <p>William Davis Ltd do however welcome the flexibility included in policy 9(d) which states that the above code standards are only encouraged and not required. Nevertheless such encouragement within a climate change policy needs to be 'justified' to be considered sound under the guidelines of PPS12. To be justified a policy must be based on a credible and robust evidence base and PPS12 paragraph 4.37 states that such an evidence base should contain 'evidence that the choices made in the plan are backed up by the background facts'. We do not consider this to be the case for Policy 9(d) as we do not consider the encouragement of meeting CSH standards to be backed up by the evidence base used by the council, in the case the 'Planning for Climate Change' study produced by IT Power in May 2008. In particular the 'Energy Efficiency Recommendations for New Developments' section of the report fails to deal with the appropriate data to fully support the council's encouraged policy aspirations. As its name suggests the 'Energy Efficiency Recommendations for New Developments' report only considers the viability of new developments matching the mandatory 'energy' requirements of the CSH criteria and does not go into detail on the full CSH program as included in Policy 9(d). Therefore we do not consider the evidence base to be complete enough to back up the encouragement made in Policy 9(d) and we do not believe the policy can be considered fully justified.</p>	William Davis believe that the detail of Policy 9(d) i-iii is not supported by a credible and robust evidence base and consequently should not be considered sound and should be deleted from the Core Strategy.

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		<p>Further to this point the example raised in Policy 9(d) is that all new dwellings should meet Code Level 6 of the CSH by 2016. However code level 5 and 6 of the CSH are not considered within the IT Power Report. Therefore Policy 9(d) cannot be recognised as justified as there is no credible and robust evidence to support it.</p> <p>William Davis believe that the viability of climate change policy needs to be considered within the Core Strategy as stated in paragraph 33 of the supplement to PPS1 which states that local planning authorities should “ensure what is proposed is evidence-based and viable, having regard to the overall costs of bringing sites to the market and the need to avoid any adverse impact on the development needs of the community”. As indicated above we do not consider the IT Power Report to constitute a credible and robust piece of evidence base. However we believe if additional text was added to policy 9(d) requiring CSH ‘where viable’ then the policy would be more consistent with national planning policy as it would then be considering the viability of the CSH program. However this change would only be effective if the evidence base the policy is based on is greatly improved.</p>	
2007/35	English Heritage	<p>Policy HE1 of PPS 5 Planning for the Historic Environment, 2010, addresses the issue of heritage assets and climate change. HE1.2 indicates that local authorities should seek solutions during pre-application discussions that lessen or avoid harm to the significance of heritage assets and their setting (see also Policies HE7 and HE10 of PPS 5). Frequently, the main issue is that of the impact on the setting of heritage assets, particularly with regard to wind farm proposals. Setting is more than visual impact (see paragraphs 113 – 123 of the PPS 5 Practice Guide and the draft English Heritage guidance on setting; once the final draft has been published the English Heritage guidance on Wind Farms will be updated).</p> <p>Policy 9 e) refers to ‘significant adverse visual impact’ upon designated heritage assets. It is clear from PPS 5 that the setting of a heritage asset is also influenced by other considerations including ‘other environmental factors such as noise, dust and vibration; by spatial associations; and, by our understanding of the historic relationship between places’ (PPS 5 Practice Guide, paragraph 114). The harm to the significance of undesignated heritage assets should also be considered. This has been confirmed by the recent appeal decision for the Harrington wind farm proposal (Daventry District) where one of the reasons for refusal was the harm to the setting and significance of undesignated heritage assets (Cold War remains). We support the criteria-based approach set out in the policy as proposals affecting heritage assets need to be considered on a case by case basis.</p>	The following change to Policy 9 e) ii is proposed in order to reflect national policy: ii. ensures that the siting of development avoids harm to the significance of a heritage asset, whether designated or not, and its setting;
2055/357	Leicestershire County Council	The use of the word ‘encouraged’ in respect of the standard for sustainable homes is too weak to have any realistic effect – and is in contrast to para d) ii. which does use ‘required’ even though Government policy is to introduce the zero carbon standard later than for residential development.	Use ‘required’ rather than ‘encouraged’.
2055/358	Leicestershire County Council	Use of the word ‘encouraged’ will render the Policy 9 (d) unenforceable – the Merton Policy only works when it is a requirement.	Use ‘required’ rather than ‘encouraged’.
2011/48	Limetree Real Estates	The fundamental importance of this issue is recognised and it is intended that the development of sites such as the land west of Rockingham Road, Market Harborough, which is the subject of the enclosed Promotional Document, would comply with the requirements to meet the BREEAM very good standard and to provide 10% of their energy requirements via on site or decentralised generation.	Amend criterion b) to suggest the allocation of 5 hectares of additional employment land for the development of Market Harborough together with the sum of any unimplemented employment allocations from the Harborough District Local Plan.
2012/50	Transition Harborough	While we believe this section to be sound it only sets the scene for the council to meet minimum legal requirements; we feel that this is an opportunity for the council to raise the bar of it environmental credentials and become proactive in this area.	While we believe this section to be sound it only sets the scene for the council to meet minimum legal requirements; we feel that this is an opportunity for the council to raise the bar of it environmental credentials

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			<p>and become proactive in this area.</p> <p>Appendices have been included - see supporting documentation</p> <p>As an example we have reworded Policy 9 attached below.</p> <p>Policy 9: Addressing Climate change and Peak Oil</p> <p>Development which adapts to climate change and helps to reduce the Districts carbon emissions will be supported. The District acknowledges that the UK and in turn the District of Harborough is exposed to Energy insecurity through a growing National energy gap and over reliance upon imported energy sources (such as Electricity imported from France and fuels such as Natural Gas, Oil and Coal which have peaked or are about to peak in production).</p> <p>The District further recognises that it is prudent to reduce the Districts reliance upon Carbon based fuels through Renewables and efficiency measures. This policy will be driven by an Energy Security strategy which will address the twin issues of Peak Oil/Gas and Climate change and plan for an Energy consumption descent in the District coupled with an increase in local Renewables generation.</p> <p>The District further acknowledges that all new buildings that do not meet at least Code 6 will increase the Districts carbon budget at a time when it is likely in the near future that it will hold a Local Carbon budget and will need to reduce the Districts output by 34% by 2020. The District will produce an annual independently audited Carbon Statement using a robust methodology for the District to allow accurate year on year comparisons to facilitate a reduction in the Districts Carbon footprint.</p> <p>This will be achieved through measures to ensure that:</p> <p>a) <input type="checkbox"/> New development is directed towards the most suitable locations and mitigates against any potential impacts on the environment; (all development impacts upon the environment, what does this statement mean)</p> <p>b) <input type="checkbox"/> Derelict, vacant and under-used land is prioritised for redevelopment in accordance with National Planning Policy Guidelines and brought back to more functional uses;</p> <p>c) <input type="checkbox"/> The use of sustainable materials and construction methods is to be supported and encouraged through the requirement of developers to use FSC certified wood and the production of a thorough analysis of the carbon embedded within each development.</p> <p>d) <input type="checkbox"/> All new developments within the District incorporate site layout and design principles which reduce energy demands and increase energy efficiency as follows:</p> <p>I. <input type="checkbox"/> All residential developments will have to meet minimum standards as required by building regulations (currently Code 4 rising to meet Code 6 by 2016). Developers will be encouraged to pursue Passive Haus standards by a 20% discounted rateable value for all accredited dwellings. 75% of all dwellings in a development (Rising to 100% in 2016) will have a south</p>

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			<p>facing roof aspect to allow retrofitting of Solar PV and heating. Developers will be encouraged to adopt the building standards described in Appendix II.</p> <p>II.□ All medium to large residential developments will be required to provide facilities for its residents in the form of local shopping precincts/shops which will reduce the need to travel into town for small shops thus reducing congestion and allowing for more small business to be established in the town.</p> <p>III.□ Non residential developments will be required to meet a BREEM (or equivalent) assessment rating of Excellent; the District will adopt the Planning Policy 46D from Milton Keynes Unitary council as a model.</p> <p>IV.□ The provision of on-site or decentralised renewable energy systems will be encouraged on non-residential developments of 1,000 square metres and above. Such systems should provide a minimum of 10% of a site's total energy requirements. This is to be reviewed annually as part of the Energy Security Strategy review process. A phased business rate rebate scheme will be introduced for schemes that provide more than 20% of their energy requirement from Renewables.</p> <p>e)□ The use of renewable, Carbon neutral and low carbon energy sources are promoted, along with decentralised energy networks. As part of the Energy Security Strategy the District will draft a map and mark out zones where turbine applications will have a preference, this cross tabulated with wind speeds and overlaid with the transmission grid positions should identify key locations for developments.</p> <p>The District aims to have 20% of its energy generation produced locally by Renewables by 2030 as part of its Energy Security strategy.</p> <p>Stand alone renewable energy generation will be supported within the District, where the proposal:</p> <p>I.□ Ensures that the most appropriate technology is selected for the site;</p> <p>II.□ Ensures that the siting of development does not result in a significant adverse visual impact upon the Districts listed buildings, Scheduled Ancient Monuments, Conservation Areas or Registered Parks and Gardens;</p> <p>III.□ Ensures that the siting of the development does not create a significant noise intrusion for existing residential dwellings;</p> <p>IV.□ Includes measures to mitigate against any adverse impacts on the built and natural environment resulting from the construction, operation and decommissioning of any equipment/infrastructure;</p> <p>V.□ Does not create an overbearing cumulative noise or visual impact from the renewable energy developments when considered in conjunction with similar developments and permitted proposals within the District and within adjoining Local Authority Areas</p> <p>f)□ Additional innovations which will have a positive impact upon climate change adaptation will be supported and encouraged on all developments where feasible. (This could include, but is not limited to: appropriate shading and planting, green roofs, Sustainable Urban Drainage Systems, rain harvesting and storage and grey water recycling).</p> <p>g)□ All commercial developments will include schemes that slow the transit of rainfall into the storm drains, green roofs and SUDS are a priority in recognition that Harborough's drainage systems struggle to cope with the current demands made of them.</p> <p>h)□ Air Quality is a stated priority of the District, in recognition of the growth of wood burning stoves and reinstatement of fire places in dwellings</p>

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			<p>within the district and a lack of managed woodland to supply well seasoned logs for combustion which are essential to keeping smoke to a minimum, the District will encourage the planting of managed woodland coppice to supply fuel logs to the District. The creation of this scheme will be funded by the foundation of a local carbon offset scheme which will allow the District to show measurable carbon reductions in its budget.</p> <p>i) <input type="checkbox"/> Food production and transport adds an additional burden to the Districts Carbon footprint, the District will actively encourage the growth of local produce and will find innovative and budget neutral ways to provide allotment spaces to meet demand.</p> <p>A Food security strategy will be formulated which will take into consideration the effects that the Energy Security strategy aims to mitigate (such as supply chain disruption) and provide a framework for the development of local food production and distribution; this will provide food security and lower the Districts carbon footprint.</p> <p>j) <input type="checkbox"/> Due to its rural setting and fragmented public transport services the District will always need personal transport systems such as the private car. In urban areas the District will strive to provide extra facilities such as cycle parks and lanes to encourage the non-use of cars.</p> <p>k) <input type="checkbox"/> Existing housing stock of the District is to be reviewed and allocated an energy efficiency rating, local businesses are to be encouraged to create fixed price refurbishment bundles that will upgrade these dwellings as a matter of priority in a retrofit scheme to improve drastically the efficiency rating of these dwellings. Not for profit co-operatives are to be encouraged as a way of reducing the costs associated with this scheme. The District will seek out funding from external source to cover this project.</p>
2062/408	Ms R Page		<p>If the district will support the provision of wind turbine this should not be supported at the detriment of the wider community and firmer policies should be set especially in relation to introducing a 2 km separation zone</p>
2077/470	Mr D Mason		<p>For now and the foreseeable future power generation will produce co2 however carbon capture is on the way. Carbon Capture can only sensibly be applied to large scale power generating stations, its provision is also outside the Districts control. Wind and solar power generation is climate dependent and can therefore only augment national grid provision, they are however within the Districts grid and power generated by there system should therefore be provided where ever and whenever possible; new build, conversion, retro fits etc.</p>
2081/526	Bitteswell Parish Council		<p>The need for the installation of renewable energy sources has been recognised by Government whose policy, pending the advent of generation from new nuclear build, is to site the great majority of new wind turbine generators offshore. To the extent that any wind turbine generation in the Harborough District could be justified, the satisfaction of the conditions cited at para 5.100 (e)(i) to (e)(v) would be best met by including in Policy 9 an overarching requirement that any future of wind turbine generators be located at least 2 km from the nearest dwelling. This criterion is adopted by other European countries in the determination of the location of wind farms.</p>

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2083/562	Lafarge Aggregates Ltd	<p>We support the inclusion of this policy and the recognition of the importance of development which reduces the District's carbon emissions. In addition, the support offered to stand alone renewable energy generation. We would highlight Lafarge's waste interests in this regard, particularly at Shawell, and reiterate their importance to the plan area in minimising waste production within the District. It should also be acknowledged that these facilities can contribute to the Infrastructure Schedule which has been provided by the Council and identifies the infrastructure (including recycling and waste management facilities) that will be required to facilitate the growth proposed. Lafarge is making representations to Leicestershire County Council in the preparation of their Waste Development Framework to highlight the importance of these facilities within Leicestershire and to a lesser extent the surrounding growth areas.</p>	
2085/568	Natural England	<p>Natural England consider that this policy is not sound because it does not fully cover the importance of considering sustainable energy developments against the guidance set out in the Harborough District Landscape Character Assessment (2007) and the Market Harborough Landscape Character Assessment (2008).</p> <p>Natural England supports the principle of sustainable energy generation and believes that such developments, if appropriately sited can make an important contribution to the low carbon economy that is needed to tackle climate change. However as well as the climate change mitigation benefits of renewable energy schemes, there can also be significant adverse effects on landscapes, nature conservation and people's enjoyment of the countryside and landscape. We will therefore consider renewable energy proposals on the basis of the extent to which they conserve and enhance the existing natural environment. We would therefore recommend that the impact on landscape character is more strongly mentioned in this policy with particular reference to the District and Market Harborough Landscape Character Assessments. If the guidance in the LCAs is followed it will help to ensure that installations are located in places which will cause minimum impact on the surrounding landscape.</p>	<p>Natural England recommends that in the policy wording under point (e ii) that "or local landscapes" is added after "registered park and gardens"</p> <p>We also suggest that in paragraph 5.1.04 in the fifth sentence after "policy 9" that "and the Harborough Landscape Character Assessment" should be added in order to strengthen the consideration of the impact of sustainable energy generation developments on local landscapes.</p>

Policy 10 Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
3631/220	Dr K Feltham	There is an ongoing risk of flooding especially in the settlements listed in paragraph 5.110, and this policy provides a framework for managing and reducing the risk in these areas.	
3613/276	Billesdon Parish Council	Paragraph 5.110 correctly includes Billesdon in the list of villages experiencing flooding in 2009, but the village is not included in the (5.107) list of settlements 'sensitive to any net increase in surface water discharge'.	Add Billesdon to the list of settlements 'sensitive to any increase in surface water discharge'.
2055/359	Leicestershire County Council	Use of the word 'expected' means the Policy will be less effective than if they were 'required'.	Use 'required' rather than 'expected'. Also add County Council to list of consultees following the changes introduced by the Water Act.
2077/471	Mr D Mason	For Market Harborough siting major future build at the the airfield site obviates flood risk.	

Policy 11 Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2005/8	Leicestershire Police	<p>Thank you for seeking our views on your new document. I have read the document and overall I think that it captures the main issues from a community safety, crime and policing context. I would however suggest some minor additions which will help strengthen the plan and I would ask you to insert these to more fully cover these matters.</p> <p>I am pleased with the content of Core Strategy Objective 8 however this does sit a bit prone because the supporting design policy 11 is a bit thin as far as crime and community safety are concerned and because the crime and community safety strand from the Sustainable Community Strategy is not that evident.</p>	<p>Add bullet point say at vi] to read "mitigate existing patterns of crime and minimise the vulnerability of existing and new residents and occupiers to crime." This is an addition that will make the Strategy more Sound. The Explanation under policy 11 also needs an addition. I suggest " In the layout and design of new development crime and community safety issues are important planning considerations. This is reflected in national planning guidance and the council works closely with Leicestershire police and local developers to make sure, as far as is possible, that new development is secured by design."</p>
2019/83	Kibworth Beauchamp Parish Council	<p>The Council are fully in favour of item 'f' ensuring that conservation areas are 'kept under review and work with the local communities to appraise other areas of special architectural or historic interest in the towns, suburbs and villages of the District to inform potential designation of additional Conservation areas.</p>	
2035/179	The Leicester Diocesan Board of Finance	<p>The policy sets out an admirable intention of seeking to promote good quality design and advancing the protection and conservation of heritage assets. However, the effectiveness of this aim is undermined by the limitations contained in paras b & e of the policy.</p> <p>Para b contains a blanket policy that new development should be directed away from undeveloped areas of land which are important to the form and character of a settlement or locality. However, there will be instances where a sympathetic high quality development could enhance such an area and contribute the future of the settlement. The first sentence of paragraph b requires that all development should respect the contexts in which it is taking place and this is an appropriate way of covering the point.</p> <p>Para e supports permitting development to enable historic buildings, parks and gardens to be maintained in good repair and we support this aim. However, the policy favours tourism or business development. The proposed new use of a heritage asset should be based on securing the optimum viable use of a heritage asset in support of its long term conservation and should make a positive contribution to economic vitality and sustainable communities (PPS5 Planning for the Historic Environment Planning Practice Guide).It is therefore incorrect to suggest favouring a particular end user in general as this should be determined following analysis of the heritage asset in question.</p> <p>Para 5.124 refers to enabling development and implies that the strategy policy covers enabling development. PPS5 (Policy HE11 :Enabling Development) makes clear that enabling development applies where the development to secure the future of a heritage asset outweighs the dis benefits of departing from the development plan.</p>	<p>With regard to para b; the sentence "new development should be directed away from undeveloped areas of land which are important to the form and character of a settlement or locality" should be deleted.</p> <p>With regard to para e; the words "especially where this supports tourism or business development should be replaced with; "including tourism, business development, residential or other suitable uses".</p> <p>With regard to para 5.124; the wording should be amended to make clear that where development of a heritage asset doesn't comply with policy 11 it could be considered as enabling development if it meets the tests set out in policy HE11 of PPS5.</p>
3656/180	Mr N Horton	<p>The policy / explanatory text doesn't make clear the mechanism for safeguarding or reviewing land identified as Important Open Land.</p>	<p>My back yard in Hallaton is identified as 'Important Open Land' in the Local Plan. I am concerned how this land may be treated / affected by the Core Strategy as it should not be designated as open land.</p>
3631/216	Dr K Feltham	<p>Policy is basically sound but could be improved by reference to CABI's Building for Life assessment scheme.</p>	<p>Include reference to CABI's Building for Life assessment scheme.</p>
2049/290	National Trust	<p>Whilst the first part of the Policy dealing with design in general adequately deals with the matter of wider context in general, the section on heritage however is lacking in terms of the specific</p>	<p>It is requested that the introductory sentence of that part of the Policy that specifically deals with heritage assets is supplemented as follows:</p>

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		<p>issue of the setting of heritage assets and at present it is considered that it does not conform to national policy as set out in PPS5. Attention is also drawn to National Trust’s earlier inputs to the Core Strategy work – in particular its comments from 19th July 2009 on the Alternative Options consultation, i.e.:</p> <p>“More importantly it is noted that the discussion of designated sites has been limited to the areas covered by the designations but has not considered their wider settings as per advice in PPG15 and the relevant environmental and heritage policies in the adopted RSS. In many cases heritage assets are well looked after and it can be ill-considered development nearby, on a designed vista, or ignoring a rural setting, which pose the greatest threats. Accordingly the policies developed for heritage assets also need to consider their wider settings.”</p> <p>This consideration is all the more important in the context of the wealth of heritage assets in the District (as referred to at para 5.116).</p>	<p>“Heritage assets within the District, including their wider settings, will be protected, conserved and enhanced, ensuring that residents and visitors can appreciate and enjoy them through:...”</p>
3646/312	British Waterways	<p>British Waterways (BW) supports this policy, and in particular the importance afforded to the Grand Union Canal Conservation Area and the Grade II listed Foxton Locks and associated Inclined Plane Scheduled Monument within the District. These are significant designated Heritage Assets as identified in government guidance contained in PPS5- Planning for the Historic Environment, and the acknowledgement of their national significance and particular value and importance to Harborough District is considered appropriate, as is the encouragement of development which helps to promote understanding and appreciation of these assets, the restoration of the boat lift/inclined plane and the provision of visitor accommodation associated with these assets. The potential of these assets as both tourism and recreation attractions, as well as the role they can play in providing a key strategic green infrastructure corridor through the District is rightly acknowledged, and BW considers that the Council is fully justified in placing an emphasis on the importance of the Grand Union Canal and Foxton Locks within this policy, an approach which is supported by national guidance contained in PPS5- Planning for the Historic Environment.</p>	
2007/36	English Heritage	<p>While we welcome the inclusion of this policy, we have a number of comments about its consistency with national policy as set out in PPS 5 Planning for the Historic Environment and current practice. We also consider that not all partners have signed up to the proposals set out in the Foxton Locks Masterplan.</p> <p>Policy 11 d)</p> <p>This seems to suggest that ‘spot listing’ will be encouraged. While there may be cases where its use might be appropriate, English Heritage, who is responsible for designation, wishes to stress that, in order to manage the demand for designation, any proposals for listing should meet certain criteria. The principles of selection are published by the DCMS. The basic criterion for listing a building is that it must hold special historic or architectural interest (see paragraph 14 of the PPS 5 Practice Guide and paragraph 9 of ‘Principles of Selection for Listing Buildings’ [DCMS, March 2010]). In addition, with reference to Policy 11 i), English Heritage is in the process of preparing guidance on local listing to assist local authorities.</p> <p>Policy 11 e)</p> <p>English Heritage objects to the inclusion of this bullet point in its current form. The policy refers to ‘enabling development’. PPS 5 Policy HE11.1 and paragraph 125 of the Practice Guide make it clear that such proposals are exceptional and should only be used to secure the long-term future of a heritage asset when conservation through development in compliance with policy</p>	<p>Recommendations: The changes set out below are required to reflect the policies of PPS 5.</p> <p>Policy 11 d) The following revised wording is proposed: Supporting proposals for the statutory listing of buildings where it can be demonstrated that the buildings meet the criteria for designation;</p> <p>Policy 11 e) We propose an approach to the management of ‘at risk’ heritage assets that is set out in the recommended changes to the supporting text at paragraphs 5.124 and 5.125. It is recommended that Policy 11e) is replaced by: Realising and actively seeking opportunities within the planning process to secure the viable and sustainable future of heritage assets at risk of neglect or loss, especially where this supports tourism or business development, providing such development is consistent with the significance of the heritage asset;</p> <p>Paragraphs 5.124 and 5.125 5.124 Where heritage assets are found to be ‘at risk’ (i.e. heritage assets on the Heritage at Risk Register: English Heritage or on a local register covering Grade II and locally listed heritage assets) or in danger of falling into this category, the strategy promotes the</p>

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		<p>(development plan or national) cannot do so. Any proposals need to meet strict criteria, of which 'historic character' would only be one small aspect; there are complex economic criteria to be met. However, there may be cases where the management of historic buildings or parks and gardens might benefit from developer obligations, but only in the context of a planning permission that complies with the development plan and national policy and the measures are appropriate to the significance of the heritage asset.</p> <p>Policy 11 j)</p> <p>The Foxton Locks site is one of the most important historic sites in the District. As well as the scheduled remains of the Inclined Plane, the flight of locks is listed Grade II* (not II as stated) and there are a further 5 listed buildings and structures associated with the canal; the area has also been designated as a Conservation Area. A Conservation Plan has been prepared for the Foxton Locks site and in February 2010, a new Heritage Partnership Agreement (HPA) was signed by British Waterways, English Heritage, Harborough District Council and Leicestershire County Council. Previously, English Heritage has expressed substantial reservations about the content of the Foxton Locks Masterplan 2009; the intensity and scale of the masterplan proposals would, we believe, result in potential harmful effects on the character and appearance of the locks complex and the setting of individual heritage assets. The masterplanning proposals represent a significant over-development of the site. Any development proposals in this area need to have regard to the potential impact on the significance of the designated heritage assets and their setting (Policies HE7, HE8, HE9 and HE10) and accord with the Conservation Plan and HPA. Following the successful completion in 2008 of works to regenerate the site, which included substantial conservation works to the scheduled inclined plane, which resulted in it being removed from our Heritage at Risk register, the Masterplan proposals would take the development of the site in a new direction that focuses on maximising its tourism potential in a way that would not be consistent with its conservation status, the Conservation Plan and the 2010 HPA. Nor do they take into account the capacity of the site to accommodate more visitors without causing harm to the site or negative impacts on the experience for visitors. It should be noted that the proposed 'restoration' of the Boat Lift would, in fact, be a reconstruction/ replication of a structure that was removed in the 1920s.</p>	<p>development of creative and sustainable measures to secure the future of such asset, in a manner appropriate to their significance. Much of this work could be achieved through the normal planning process though other measures may at times be a useful addition or be found necessary. For example, the use of developer contributions, including the Community Infrastructure Levy, for the maintenance of a public park or repairs and improvements to heritage assets where they are an infrastructure item as defined by the 2008 Act, such as cultural facilities. In exceptional circumstances, 'enabling development' as defined in English Heritage's guidance and is subject to strict conservation and economic criteria, might be appropriate.</p> <p>5.125 The national register also includes Conservation Areas at risk, although there are currently none in the District; however, the Council is committed to improving the management of the Conservation Areas in the District through the preparation of Conservation Area Appraisals and Management Plans, its development management procedures and the use of Article 4 Directions, where appropriate. There are currently 62 Conservation Areas within the District which need to be kept under review. Between 2005 and 2007 they were all subject to appraisal and boundary modifications where needed. Further areas are being considered at Dunton Bassett, Great Glen, Mowsley, Little Bowden and Peatling Magna subject to full appraisal as resources permit and the involvement of the local community.</p> <p>Policy 11 g) References to Scheduled Ancient Monuments, here and elsewhere in the plan, should be changed to Scheduled Monuments to be consistent with PPS 5 and reflect the fact the scheduled areas now cover recent archaeology, such as Cold War remains.</p> <p>Policy 11 j) We recommend that the current wording is replaced by the following: Promoting and managing Foxton Locks and the Grand Union Canal as a tourism attraction and key strategic Green Infrastructure corridor in line with the Conservation Plan and Heritage Partnership Agreement.</p> <p>The following changes to paragraphs 5.118 and 5.126 are recommended: Paragraph 5.118: Change Grade II to Grade II*. Paragraph 5.126: In order to reflect the approach to the management of the site set out in the Heritage Partnership Agreement 2010 the following amendments to this paragraph are required: 5.126 Foxton Locks is a nationally significant heritage feature of the District. It includes the Grade II* flight of locks and other listed buildings associated with the Grand Union Canal and the scheduled Inclined Plane; the site is also a conservation area. The Council has worked with British Waterways and its partners to deliver the first phase of improvements to the area, which included the restoration of the 'at risk' Inclined Plan. In February 2010, the District Council signed a Heritage Partnership Agreement (HPA) with British Waterways, English Heritage and Leicestershire County Council to underpin the future development and management of this site. The Foxton Locks Masterplan Report (July 2009) set out a vision for the development of Foxton Locks as a regional tourist destination, including the replication of the inclined plane boat lift. The appropriateness and feasibility of the proposals set out in the masterplan</p>

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			<p>need to be assessed in the context of the HPA together with the Conservation Plan and PPS 5. The policy set out above supports the sensitive promotion of the Foxton Locks area, and the wider canal network, as a tourist destination and is in line with the Council's Economic Development Strategy 2008 – 2013 which seeks to 'encourage the development of the district's tourism assets, attractions and potential in a sustainable way'. The policy sets out the Council's support for further development of the tourism and recreational potential of Foxton Locks, in recognition of its value not only as a designated heritage asset but also as a key strategic Green Infrastructure corridor which presents significant recreational, biodiversity and countryside access opportunities.</p>
2055/360	Leicestershire County Council	<p>Chapter Title and Policy 11 should refer to 'good' design. Policy 11 makes no mention of CABE's Building for Life (BfL) assessment scheme. This nationally recognised scheme, led by CABE and the Home Builders Federation, allows structured and objective evaluation of schemes to ensure high quality design. BfL is evaluated against 20 criteria to ensure that housing developments are attractive, functional and sustainable.</p> <p>The Building for Life assessment has been taken forward in the adopted Core Strategies of Hinckley and Bosworth and Leicester City and is present in the emerging Core Strategies of Blaby, Charnwood, Melton and North West Leicestershire.</p>	Perhaps should be called "Promoting good design..." Consider inclusion of CABE's BfL standards.
2055/361	Leicestershire County Council	<p>The Policy is limited in its acknowledgement of the waste that would be generated by housing developments within the district. The Policy notes any development should minimise waste and encourage re-use and recycling wherever possible. However, the Policy provides no information in how it intends to achieve this or for how to handle the remaining residual waste that the development generates. Any development will place additional burdens on the existing Refuse Collection fleets, 'bring banks' (HDC controlled) and the local Civic Amenity Sites (LCC controlled). A new development would impact on the local Civic Amenity service provided, yet there is no acknowledgement of this within the main document and how they contribute to the above Policy (although it is recognised that they are individually mentioned in the Infrastructure Schedule).</p>	There needs to be acknowledgement of which infrastructure may need to be supported to meet the Policy statement and how this would be achieved. For example and in relation to Civic Amenity sites only, the provision of extra capacity to accommodate the additional waste would be, if needed, through developer contributions to provide new infrastructure (compaction equipment, new bays etc).
2009/41	Cllr G Spendlove-Mason	<p>Conservation status for parts of Great Glen is long overdue. I understand a comprehensive parish plan was produced several years ago.</p>	Conservation status for parts of Great Glen is long overdue. I understand a comprehensive parish plan was produced several years ago.
2018/75	Thurnby and Bushby Society	<p>Identifying buildings of local importance: With reference to paragraphs 5.122 and 5.123, we support the recording of older buildings of previous architectural styles especially those of particular character or local significance. A community should not systematically lose all its older buildings to make way for new housing estates.</p> <p>It is in line with Harborough Sustainable Community Strategic Vision paragraph 2, and with Harborough Core Strategy Strategic Objectives 5 and 6.</p>	
2081/527	Bitteswell Parish Council		<p>As currently presented, Policy 11 affords significantly less protection of Conservation Areas against inappropriate development than that provided by the relevant policies in the Harborough Local Plan, notwithstanding that it is claimed in Appendix 3 that these policies have been replaced by Policy 11. In view of the importance of Conservation Areas to the heritage of the Harborough District it is recommended that Policy 11 is reviewed to ensure</p>

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2083/563	Lafarge Aggregates Ltd		that there has been no dilution of the protection of Conservation Areas provided hitherto.
2085/569	Natural England	<p>Policy 11: Promoting Design and Built Heritage</p> <p>Natural England strongly supports this policy and is pleased to see that it incorporates a number of concepts which we also foster in our work. For instance we promote the setting of high standards of design in all new development, ensuring that development is 'good enough to approve', accessible to all, locally distinctive and makes a positive contribution to the area. We also particularly welcome the inclusion of Village Design Statements in paragraph 5.123. We believe a Village or Town Design Statement [VDS] is a practical tool to help influence decisions on design and development. Prepared correctly, a VDS will provide a clear statement of the character of a particular village or town against which planning applications may be assessed. It is not about whether development should take place, but about how development should be undertaken so as to respect the local identity.</p>	<p>Areas of archaeological interest can differ significantly across the district in terms of their level of importance. Minerals development, for example, could affect an area of archaeological interest but in the majority of circumstances any potential impact can satisfactorily be addressed through the use of appropriate mitigation. We would recommend toning down the wording of this policy to avoid the use of 'safeguarding all assets' and replace with a distinction that protection will vary depending on the level of importance. Making this distinction would accord with the advice within Planning Policy Statement 5 - Planning for the Historic Environment.</p>

Policy 12 Representations

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3575/114	Oadby and Wigston Borough Council	Policy 12 refers to an annual review and update of the Local Infrastructure Schedule. However, it is not clear what relationship the reviewed/ updated document will have to Appendix 2, once the Core Strategy has been adopted.	Provide clarity
2006/12	Slawston Parish Council	The plan will have a considerable impact on the provision of services and traffic congestion within the district. This was emphasised by Parish Chairman at a meeting in July 2010, when it was agreed that the District Council would co-ordinate and quantify this for the Core Strategy. Appendix 2 covers many elements omitting parking and rail services) but most of these elements are quantified and simply left as 'to be determined'. The plan does not measure or even assess the impact of the proposed policies and to this extent it is not robust or complete.	'Yardsticks' should have been used to quantify how many extra police, health professionals, social workers, hospital beds, road improvements, parking spaces, etc., are needed to cater for the growth in population. This has not been done, and the plan is therefore nothing more than a collection of policy statements. This Parish is not opposed to the proposed number/allocation of houses, but we are opposed to its approval until a proper assessment of the impact on services/infrastructure has been completed.
2021/93	East Midlands Housing Group		We strongly recommend that commuted sums are waived / not required for affordable housing schemes. Charging commuted sums will make schemes unviable and less likely to receive grant support to deliver.
3570/124	Sport England	We are concerned that the evidence base relating to sport and recreation is not up to date or comprehensive. Given this situation, policy 12 and the Local Infrastructure Schedule contained in Appendix 2 are not able to articulate the sporting infrastructure requirements and we therefore consider this element of the strategy is not sound because it is not justified.	The existing evidence base relating to sport and recreation being up dated and expanded.
2029/132	Davidsons Group	<p>There is no objection to establishing the principle of developer contributions through the Core Strategy or the identification of the type of infrastructure anticipated to support the development outlined in the document. Policy 12, however, is not considered to be compliant with the Community Infrastructure Levy (CIL) requirements. Any proposals for pooled contributions, such as would be required to deliver the local infrastructure schedule attached as Appendix 2 to the Core Strategy, need to be CIL compliant as it is intended that the use of planning obligations for such matters will be phased out. To be CIL compliant any charging schedule must be subject to consultation and independent examination and must therefore be contained within a DPD.</p> <p>As it currently stands, the infrastructure schedule is not sufficiently refined or based on robust and credible evidence to enable the provision of infrastructure through developer contributions to be considered as part of the Core Strategy. Furthermore, no appropriate and CIL compliant strategy is outlined within the policy which would address the provision of infrastructure funding. The policy only refers to further guidance being provided in a Developer Contributions SPD. This is unacceptable in CIL terms and it will be necessary for the Council to prepare a separate DPD to cover the issue of developer contributions. Without such a proposal being included in Policy 12, the Core Strategy is not considered to be effective or justified.</p>	<p>The third paragraph ,final sentence should be revised to read</p> <p>“Further guidance will be provided in a Development Contributions DPD”.</p> <p>Paragraph 5.133 should be updated accordingly.</p>
2042/241	Western Range	<p>For the rural centres, the text indicates that additional development in Fleckney would give rise to the need for additional facilities and/or contributions towards primary and secondary education, healthcare facilities, policing and waste. The extent of the need in all cases, is, however, still to be determined.</p> <p>It is envisaged that the High Street residential development could provide up to 30% affordable housing and contributions towards the improvement of public open space and highway</p>	Further detail on the likely required infrastructure/developer contributions for the development is required following discussions with the relevant stakeholders.

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		infrastructure, however, in the absence of the Council's requirements being specified, it is not possible to detail what they would be.	
2044/248	Barratt Strategic	<p>For the Leicester urban fringe, the text indicates that additional development could give rise to the need for additional facilities and/or contributions towards primary and secondary education, healthcare facilities, policing and waste. With the exception of policing, the extent of the need in all cases, is, however, still to be determined.</p> <p>It is envisaged that the Springhill Farm residential development could provide up to 40% affordable housing together with public open space and contributions towards highway infrastructure, however, in the absence of the Council's requirements being specified, it is not possible to detail what they would be.</p>	Further detail on the likely required infrastructure/developer contributions for the development is required following discussions with the relevant stakeholders.
2045/253	David Wilson Homes	<p>For the rural centres, the text indicates that additional development in Billesdon would give rise to the need for additional facilities and/or contributions towards primary and secondary education, healthcare facilities, policing and waste. The extent of the need in all cases, is, however, still to be determined.</p> <p>It is envisaged that the Gaulby Road residential development could provide up to 40% affordable housing together with public open space and contributions towards highway infrastructure, however, in the absence of the Council's requirements being specified, it is not possible to detail what they would be.</p>	Further detail on the likely required infrastructure/developer contributions for the development is required following discussions with the relevant stakeholders.
2051/311	The Theatres Trust		Policy 12 states that Other community facilities not referenced in the Infrastructure Schedule (including facilities for Burials and Cremation, Places of Worship, Arts and Culture) will be supported subject to compliance with transport and design policies (Policies 5 and 11). We don't understand this statement as arts and culture do not seem to be supported in these policies.
2052/315	National Grid		<p>The Submission Draft Core Strategy document identifies an area to the north west of Market Harborough to accommodate approximately 1,000 dwellings and associated retail, community and recreational facilities. One of National Grid's high pressure underground gas transmission pipelines runs close to this area.</p> <p>Local authorities have a statutory duty to consider applications for development in the vicinity of high pressure (above 7 bar) pipelines and to advise the developer on whether the development should be allowed on safety grounds on rules provided by HSE. In order to enable Local Authorities to discharge this duty and also to ensure that National Grid's pipelines are protected from uncontrolled development in the vicinity of the pipeline please read the following guidance:</p> <ul style="list-style-type: none"> - Specification for Safe Working in the Vicinity of National Grid High Pressure Gas Pipelines and Associated Installations - Requirements for Third Parties <p>http://www.nationalgrid.com/uk/LandandDevelopment/DDC/GasElectricNW/safeworking.htm</p> <ul style="list-style-type: none"> - Gas Transmission Underground Pipelines – Guidance <p>http://www.nationalgrid.com/uk/LandandDevelopment/DDC/gastransmission/gasguidance.htm</p>

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2053/316	Anglian Water		<p>Should development be taken forward in this area in the future, the developers should be made aware of the above issues.</p>
			<p>The burden on existing treatment works will be increased and extensive improvement works may be required. There is limited capacity at Market Harborough and it is anticipated some extension will be necessary to accommodate the planned growth in the town. In particular, for wastewater treatment works, the need to ensure no deterioration in the environmental quality of the receiving watercourses due to treated effluent discharge may lead to changes in treatment technology to meet more stringent discharge consents. In addition there will be a requirement to upgrade our sewerage piped networks. The issues arising from pipeline improvements in existing communities can cause major disruptions and early community consultation is required to minimise their impact. Anglian Water can provide the required capacity to support all the options identified in the consultation document.</p> <p>Until firm proposals (in terms of development volumes, locations and timings) are presented it is not possible to provide full details of our strategic wastewater infrastructure that is required or impacted. Nevertheless, we co-ordinate the development of new or enhanced infrastructure with other organisations, such as the Environment Agency, to ensure that adequate and co-ordinated water resource planning, drainage and pollution control is in place. This can best be assured through full consultation with Anglian Water and other relevant bodies in the planning process well in advance of the date when the infrastructure is required. The provision of new, or of significant extensions to, wastewater treatment works is likely to require approval through the planning process. In order to ensure timely provision of such facilities to meet the development timescales an integrated approach to planning of the overall development, including the necessary utility provision would be welcome to minimise the risks to environment.</p> <p>As part of the water industry management process we are required to develop an Asset Management Plans (AMP), which is reviewed with the economic regulator (Ofwat) and used to determine the customer bill limits and thus the level of capital investment over successive five-year periods. This is a robust and well-rehearsed funding mechanism that has been approved for the period 2010-2015 by our regulators.</p> <p>As part of its normal asset management planning activities, as well as its current business planning process, we have identified the investment necessary to support new, known developments in the period 2010-2015 (AMP5) which does not include any investment for growth for the district of Harborough. Setting aside the necessity to secure permissions from planning authorities and environmental regulators, significant changes to wastewater infrastructure mid-AMP period, particularly those outside the current price setting mechanism, will need to be agreed with our economic regulator. The investments to serve large-scale, long-term investments should ideally be incorporated into future Periodic Review cycles and the</p>

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			<p>next effective opportunity is the Asset Management Plan to be submitted to Ofwat in 2014 to cover the investment period 2015-2020.</p> <p>Attached also is a spreadsheet identifying infrastructure issues for each site.</p>
2007/32	English Heritage	<p>Developer contributions provide the opportunity to secure improvements in a number of areas that would benefit the historic environment of the District. Heritage assets as well as being an integral part of our infrastructure, such as canals and parks and public spaces, contribute to sustainable economic development, local distinctiveness and are an essential element of place shaping. They also provide opportunities for leisure activities and social interaction and contribute to green infrastructure. Thus, repairing, maintaining, adapting and enhancing heritage assets, including conservation areas, may be matters that can be addressed through developer contributions and, where appropriate, highlighted in the Local Infrastructure Schedule (Appendix 2). For example, the Sustainability Appraisal suggests that 'Development should help rejuvenate and protect the 2 listed buildings and 4 scheduled ancient monuments currently 'at risk' in the district' (Detailed assessment matrix Policy 2); there are also likely to be other Grade II heritage assets at risk that are not currently monitored by English Heritage. However, any measures would need to reflect the approach that is set out in our representation on Policy 11. This is aside from the requirements for archaeological mitigation that might be required in association with a specific development proposal. These considerations should be addressed in the proposed Development Contributions SPD.</p>	<p>Policy 12: Appendix 2. It is recommended that an additional category is added to the schedule that covers built environment enhancement, which could include public realm improvements in town centres that might be related to traffic management proposals, enhancement measures in conservation areas and improvements to heritage assets, which might include buildings at risk, where they are an infrastructure item as defined by the 2008 Act as cultural facilities.</p>
2055/362	Leicestershire County Council	<p>No evidence has yet been produced to demonstrate that it is possible to deliver in practice a strategic development area of 1,000 dwellings to the North West of Market Harborough without causing a significant deterioration in travel and environmental conditions in the town. The transport work to date (undertaken by ARUP) has largely been at a broad level, and in the case of Market Harborough based on manual methods. Thus, the transportation impacts on the town of alternative options for housing growth and supporting infrastructure have not yet been considered in any detail. In turn, this has meant that there has been no comprehensive comparison of the merits or otherwise of alternative options, drawing together a broad range of indicators (e.g. environmental, flooding, transportation etc.) to determine whether any one option has clearer overall benefits for the town as a whole. The highway authority has not seen any evidence to suggest that a development of the scale and location proposed will be able to deliver, support and sustain a level of facilities and services that would genuinely encourage travel other than by private car and would minimise the need to travel external to the site. See also comments relating to Policy 13 c).</p>	<p>The Core Strategy should be underpinned by a more thoroughly developed transportation evidence base in respect of Market Harborough. In the absence of this evidence the District Council should review the balance of housing provision between Market Harborough and the Scraptoft/ Thurnby/ Bushby area.</p>
2010/43	Highways Agency	<p>The Highways Agency welcomes the opportunity to comment upon the Harborough Core Strategy and is keen to maintain a close level of engagement with the Authority as the Strategy is progressed.</p> <p>The Agency is broadly supportive of the policies contained within the Core Strategy and the intention of the Authority to accommodate development in the most sustainable locations so as to maximise the use of the existing infrastructure and help to encourage walking, cycling and public transport. Study work at M1J20 has indicated the early need for signalisation for the northbound off slip to ensure that the junction can accommodate development coming forward in the short term. To meet the overall level of growth anticipated to come forward during the plan period, a scheme to signalise the southbound off slip will also need to be secured. It is therefore considered that these improvements to M1J20 should be included within the Infrastructure Schedule and linked to realistic timescales for delivery, taking account of likely funding sources, including developer contributions.</p>	<p>The HA has recently undertaken a study of M1J20 to gain a better understanding of the future year operation of the junction as a result of committed and future development in the area, including the growth proposals previously contained within the emergent Harborough Core Strategy. The study concludes that signalisation for the M1 northbound off slip at M1J20 is required to prevent queues on this approach to the junction causing safety problems on the M1 mainline carriageway. It is considered likely that this scheme will be required prior to occupation of any further significant development that could impact on M1J20.</p> <p>The study has also identified a risk that increased traffic at the junction will lead to queues building on the southbound off-slip. The signalisation of this approach is therefore also expected to be required as further development takes place in the district over the plan period leading to increased traffic at</p>

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3657/415	Jelson	<p>Jelson is concerned that the policy on infrastructure is vague and provides little guidance for developers on the likely level of contributions that might be required. It is also considered that the schedule provided at appendix 2 is of little practical value. With a few very limited exceptions the schedule is unable to identify any specific infrastructure requirements stemming from the core strategy or even what form they are likely to take. There is also no indication of what it will cost developers or whether other funding is available.</p> <p>The schedule provides no evidence that any infrastructure required to support the core strategy can be delivered. If there is no evidence of what the infrastructure requirements are or if and</p>	<p>the junction.</p> <p>The HA has no funding in place for the provision of improvements to M1J20. It is therefore necessary for the Core Strategy to demonstrate how this infrastructure will be brought forward when required. The HA therefore requires the two phased improvements to M1J20 to be identified within the Core Strategy Infrastructure Schedule indicating that it is intended that they will be funded through development.</p> <p>The HA considers that the most likely funding mechanism for each signalisation scheme at M1J20 will be through a single Section 106 Agreement associated with a larger development or a small number of agreements related to significant developments that have a direct impact on the operation of the M1J20 slip roads. In addition, the HA would seek Grampian style planning conditions to link the phasing of development to the provision of the improvements.</p> <p>However, the HA is mindful of the potential for the cumulative impact of a number of small developments to cause an impact at M1J20 that requires mitigation. The HA would therefore expect the Core Strategy to provide the policy framework for the delivery of improvements to M1J20 through a pooled approach to developer contributions. In this regard, the HA considers that the inclusion of M1J20 improvements in the Core Strategy Infrastructure Schedule and Policy 12 should be sufficient to ensure that the required improvements to M1J20 can be realised through either of these funding mechanisms.</p> <p>The Highways Agency welcomes the opportunity to comment upon the Harborough Core Strategy and is keen to maintain a close level of engagement with the Authority as the Strategy is progressed. The Agency is broadly supportive of the policies contained within the Core Strategy and the intention of the Authority to accommodate development in the most sustainable locations so as to maximise the use of the existing infrastructure and help to encourage walking, cycling and public transport.</p> <p>Study work at M1J20 has indicated the early need for signalisation for the northbound off slip to ensure that the junction can accommodate development coming forward in the short term. To meet the overall level of growth anticipated to come forward during the plan period, a scheme to signalise the southbound off slip will also need to be secured. It is therefore considered that these improvements to M1J20 should be included within the Infrastructure Schedule and linked to realistic timescales for delivery, taking account of likely funding sources, including developer contributions.</p>

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		<p>when they will be delivered then this raises significant doubt as to whether the strategy itself is deliverable. There is no way that the development industry can determine whether development will be viable. In addition many of the service areas are simply identified as requiring further capacity due to general growth. In most cases there is no assessment of whether specific facilities in specific locations will require investment. Jelson is concerned that the schedule will be used to justify contributions to general operating costs or towards pools for unspecified future provision (as is already the case for many service providers).</p> <p>Policy 12 should make it clear that contributions will only be required where they meet Circular 05/2005 and Statutory tests and then only where a specific need has been demonstrated and specific infrastructure provision (on which the contribution will be spent) has been identified. It should also make it clear that in accordance with paragraphs B21 and B22 of the Circular, pooled contributions will only be required where specific and costed infrastructure requirements are set out either in the core strategy itself or in a later DPD. It needs to be clear that a vague reference to a need in schedule 2 is not sufficient justification in its own right for a contribution.</p>	
2064/422	Persimmon Homes North Midlands	<p>There is no objection to establishing the principle of developer contributions through the Core Strategy or the identification of the type of infrastructure anticipated to support the development outlined in the document. Policy 12, however, is not considered to be compliant with the Community Infrastructure Levy (CIL) requirements. Any proposals for pooled contributions, such as would be required to deliver the local infrastructure schedule attached as Appendix 2 to the Core Strategy, need to be CIL compliant as it is intended that the use of planning obligations for such matters will be phased out. To be CIL compliant any charging schedule must be subject to consultation and independent examination and must therefore be contained within a DPD.</p> <p>As it currently stands, the infrastructure schedule is not sufficiently refined or based on robust and credible evidence to enable the provision of infrastructure through developer contributions to be considered as part of the Core Strategy. Furthermore, no appropriate and CIL compliant strategy is outlined within the policy which would address the provision of infrastructure funding. The policy only refers to further guidance being provided in a Developer Contributions SPD. This is unacceptable in CIL terms and it will be necessary for the Council to prepare a separate DPD to cover the issue of developer contributions. Without such a proposal being included in Policy 12, the Core Strategy is not considered to be effective or justified.</p>	<p>The third paragraph ,final sentence should be revised to read</p> <p>“Further guidance will be provided in a Development Contributions DPD”.</p> <p>Paragraph 5.133 should be updated accordingly.</p>
2065/428	Trustees of the Bushby Settlement c/o Mather Jamie	<p>There is no objection to establishing the principle of developer contributions through the Core Strategy or the identification of the type of infrastructure anticipated to support the development outlined in the document. Policy 12, however, is not considered to be compliant with the Community Infrastructure Levy (CIL) requirements. Any proposals for pooled contributions, such as would be required to deliver the local infrastructure schedule attached as Appendix 2 to the Core Strategy, need to be CIL compliant as it is intended that the use of planning obligations for such matters will be phased out. To be CIL compliant any charging schedule must be subject to consultation and independent examination and must therefore be contained within a DPD.</p> <p>As it currently stands, the infrastructure schedule is not sufficiently refined or based on robust and credible evidence to enable the provision of infrastructure through developer contributions to be considered as part of the Core Strategy. Furthermore, no appropriate and CIL compliant strategy is outlined within the policy which would address the provision of infrastructure funding. The policy only refers to further guidance being provided in a Developer Contributions SPD. This is unacceptable in CIL terms and it will be necessary for the Council to prepare a separate DPD to cover the issue of developer contributions. Without such a proposal being</p>	<p>The third paragraph ,final sentence should be revised to read</p> <p>“Further guidance will be provided in a Development Contributions DPD”.</p> <p>Paragraph 5.133 should be updated accordingly.</p>

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		included in Policy 12, the Core Strategy is not considered to be effective or justified.	
2066/433	Davidsons Group Ltd	<p>There is no objection to establishing the principle of developer contributions through the Core Strategy or the identification of the type of infrastructure anticipated to support the development outlined in the document. Policy 12, however, is not considered to be compliant with the Community Infrastructure Levy (CIL) requirements. Any proposals for pooled contributions, such as would be required to deliver the local infrastructure schedule attached as Appendix 2 to the Core Strategy, need to be CIL compliant as it is intended that the use of planning obligations for such matters will be phased out. To be CIL compliant any charging schedule must be subject to consultation and independent examination and must therefore be contained within a DPD.</p> <p>As it currently stands, the infrastructure schedule is not sufficiently refined or based on robust and credible evidence to enable the provision of infrastructure through developer contributions to be considered as part of the Core Strategy. Furthermore, no appropriate and CIL compliant strategy is outlined within the policy which would address the provision of infrastructure funding. The policy only refers to further guidance being provided in a Developer Contributions SPD. This is unacceptable in CIL terms and it will be necessary for the Council to prepare a separate DPD to cover the issue of developer contributions. Without such a proposal being included in Policy 12, the Core Strategy is not considered to be effective or justified.</p>	<p>The third paragraph, final sentence should be revised to read</p> <p>“Further guidance will be provided in a Development Contributions DPD”.</p> <p>Paragraph 5.133 should be updated accordingly.</p>
2077/472	Mr D Mason		<p>I believe Developer Contribution is in general passed on as increased unit cost to the purchaser: which organisation will accept lower dividends or which employee will accept lower pay in providing Developer Contributions. If my belief is indeed fact then, since we all benefit from infrastructure and development provision, those buying new can be seen as paying an unfair contribution. In not paying the Developer Contribution element, Council/Government benefit financially from the system as it stands. If Developer Contributions were foregone, it follows that again in general Councils/Government would meet the shortfalls. These agencies would in turn meet the shortfall through increased Council of general taxation; this mechanism would ensure that all, rather than the few, would meet the cost of a provision from which we all benefit. It may be that emerging lower unit cost would increase sales and so provide stimulus for increased activity in the Construction Industry and thereby generate more work and jobs.</p>

Policy 13 Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2087/580	Cllr B Pain	Whilst I appreciate that the drafting and publication of the core strategy is a legal obligation for the Harborough District Council I am particularly concerned about the negative impact, particularly in relation to the traffic impact, that a potential development to the North West of Market Harborough will have. The sustainability report concedes that there will be an inevitable adverse impact upon Market Harborough. There will also be an unmanageable traffic impact upon the villages of Lubenham, Theddingworth and Foxton particularly. The same document suggests that two potential development sites (within the geography of the Harborough urban area) had been considered before drafting the core spatial strategy: the North West and The South East. I can not rationalise, neither can the strategy, why it is that such prominence and weight has been attributed to the North West site in preference to the South East whilst all the available evidence suggests (contained within the appraisal) that the South East site is much better suited to such development. I understand that the Highways Authority at Leicestershire County Council has also stipulated similar concerns and has explicitly recommended that Harborough District Council review its strategic development locations around the Harborough District in order to prevent such unmanageable traffic implications upon the north and centre of Market Harborough and its surrounding road network.	
2088/581	Ms S Clarke	I have not had the time to reply in detail. I had a long session over a year ago with one of the planning officers on what is truly sustainable housing development, which can be insisted on with developers. I think it makes much more sense to build the 1,000 houses still needed which are planned for Airfield Farm near to the M1, as a development of an existing village, or the creation of a new eco-village. I realize that this would mean greenfield land but the pressure on Harborough's transport, medical and schooling would be much less.	Set out in main representation.
3575/115	Oadby and Wigston Borough Council	There is a lack of certainty within the policy regarding public transport improvements.	Whilst the spatial strategy to focus growth at Market Harborough within the town itself and within a strategic development area is supported, Oadby and Wigston Borough Council consider that Policy 13 should be amended to provide more clarity about the public transport. Section B of the Policy refers to providing high quality public transport links to Market Harborough and to other relevant destinations. The 'other relevant destinations' are not identified in the Policy or the supporting text. The Policy should be amended to include reference to the actual destinations. Oadby district centre and Leicester city centre are two relevant destinations that should be referred to. Section C of the Policy refers to improved public transport facilities along the A6 corridor between Leicester and Market Harborough but there is no indication of what the improved public transport facilities will consist of. Part of the route to which the Policy refers is situated within the Borough of Oadby and Wigston Borough Council and within Leicester City. Whilst Oadby and Wigston Borough Council would be supportive of improved public transport facilities, the exact improvements that will be put in place to mitigate against increased car journeys between Market Harborough and the Leicester Principal Urban Area along the A6 corridor. Part of the route to which the Policy refers is situated within the Borough of Oadby and Wigston and within Leicester City. Whilst Oadby and Wigston Borough Council would be supportive of improved public transport facilities, the exact improvements should be identified in the supporting text and should receive the support of Oadby and Wigston Borough Council

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			(and Leicester City Council and Leicestershire County Council) where this is necessary or relevant in order to ensure that the improvements can be delivered through partnership working.
3454/22	The Owners of Overstone House	This Policy at Criterion B states that restricted growth on greenfield land will be in the form of the strategic development area to the north-west of the town. This area is not considered suitable for development as it is shown by the Landscape Character Assessment Study as being sensitive to change.	The allocation of some land to the south-east of the town should be considered, as the existing development boundary has been drawn too tightly around the south-eastern fringe of Market Harborough. Furthermore, as shown by the Landscape Character Assessment Study, the south-eastern fringe is shown as being less sensitive to change than the area to the north-west of the town.
2026/120	Compass Group	Policy 13 states an intention of HDC to focus on traffic calming measures for the villages of Foxton, Lubenham and Great Bowden. However, there is no further policy or regulation referenced within the document that would set controls on the levels of traffic or the increase in traffic levels or speed that would automatically require an investigation into local traffic and consequences for road safety and noise and pollution nuisance. The policy also does not link local housing and business development with the potential requirement for traffic calming with any form of measure. The proposed development at Airfield Farm will probably increase traffic through the villages of Foxton, Lubenham and Great Bowden as rat-runs that avoid Market Harborough town centre. Consequently the document cannot claim to provide effective measures for traffic calming because it only provides an intention to focus on traffic calming and does not provide either commitments or policies that can be used to deliver the intention or as measures on the effectiveness of the intention.	Provide a policy that would require traffic levels and speeds to be monitored on minor roads that are predicted to have increased traffic flows as a result of planning and development applications being approved and would determine whether or not traffic calming measures should be implemented.
2026/122	Compass Group	We request that the Areas of Separation between Great Bowden and Market Harborough and Lubenham and Market Harborough are defined more clearly. The potential conflict and thereby potential ineffectiveness of the document on the issue of separation can be seen in paragraph 6.19 of Policy 13, the retention of Policy EV/3 on page 126 and the map on page 79. Policy 13 defers the definition of the separation boundaries until the issue of the Allocations DPD whereas policy EV/3, as a retained policy, defines them. This conflict could make the document ineffective. The map on page 79 shows a separation area for Great Bowden to the south and south west but not to east as required by policy EV/3.	Provide a clear statement that links the intention of the document on Areas of Separation with the existing policies that are intended to support this policy. Clearly reference or include the Proposals Map that defines the Areas of Separation.
2036/184	William Davis Limited & Hallam Land Management Limited	<p>The identification of the SDA north west of Market Harborough is welcomed, in particular the way that it is described as a new community, linked to Market Harborough, reflects our aspirations for the site and responds positively to the community consultation that we have carried out.</p> <p>We consider that the requirement for the development to conform with more detailed design policies and principles (to be set out in the Allocations Development Plan Document and an agreed masterplan, adopted in future planning policy) does not seem to reflect the stage that we have reached with the Airfield Farm site. We have now reached a stage, in cooperation with the Council and following substantial community consultation, in preparing an outline planning application that will be processed under a Planning Performance Agreement (PPA). The PPA would suggest that the Council will determine an outline planning application for development at Airfield Farm before the Allocations DPD stage. For the reasons set out in our response to Policy 2, i.e. that without making a strategic allocation of land at Airfield Farm the Core Strategy is ineffective, we consider Policy 13 to be ineffective.</p> <p>The reference to an agreed masterplan also suggests that further significant consultation would be carried out on a masterplanning exercise to be adopted in future planning policy. This has the potential to unhelpfully repeat the community consultation and masterplanning exercise that has</p>	<p>Suggested Change: revise Policy 13 (b) to read as follows:</p> <p>b) The principal means of accommodating housing growth on Greenfield land in Market Harborough will be in the form of a strategic allocation to the north west of the town. Development in this area will:</p> <ul style="list-style-type: none">i) provide a new community, comprising approximately 1,000 dwellings, that is linked to and an integral part of Market Harborough;ii) provide a range of community facilities and local retail opportunities, including a convenience store and community hall;iii) enhance the Grand Union Canal heritage and tourism asset through the provision of a marina and associated food, drink and accommodation facilities;iv) make provision for open spaces and recreational facilities, including a new Country Park and a range of open spaces to provide for play, sport, biodiversity and recreation.v) include a primary school to serve the population of the new community;vi) in order to minimise car based travel, provide high quality walking, cycling and public transport links to Market Harborough and to other

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		<p>already been carried out. The masterplan to be submitted in the planning application for Airfield Farm has evolved taking into account two major stages of community consultation (a stakeholder workshop and a community exhibition) and now the process is moving forward to agreeing principles in a planning application. We are certainly not opposed to the idea of further community consultation, but we feel that it is important that consultation continues from the stage that the community has reached in influencing the proposals thus far; otherwise this could lead to confusion and disenfranchisement. In this respect, we find Policy 13 unjustified and unsound in that it does not reflect evidence of participation of the local community and others having a stake in the area.</p> <p>We feel that there is no need for further policy to be adopted in a Site Allocations DPD for the Airfield Farm site.</p> <p>A strategic allocation in the Core Strategy would allow for site specific criterion to be incorporated and it would seem that the requirements of Policy 13, criteria b) (i) to (v) go some way towards this. Taking into account the progress that we have made with proposals for Airfield Farm, following two major stages of community consultation and liaison with the Council and a range of statutory consultees, we are able to offer suggestion of a greater level of detail to Policy 13 in respect of the development that the strategic allocation could deliver. This suggestion is contained within our suggested changes to Policy 13 and the accompanying Concept Masterplan. Policy 13, criteria b) (vii) sets out a requirement to consider the suitability of the provision of a Local Nature Reserve as part of the development. Whilst we are not opposed in principle to the provision of a Local Nature Reserve within the Airfield Farm site, since this could compliment the new country park to be created there, we need to know more about how this would be delivered. We would be grateful to learn how it would be created, by whom, how it would be managed and what any developer requirements might be. In the absence of such information, we cannot be certain that this aspect of the policy is effective and sound. We note that the SDA is intended to provide land for additional employment development. The planning application that we have prepared for 56ha of land, which we have suggested as a Strategic Allocation, does not include employment development. The land would provide sufficient space for 1,000 dwellings and associated community facilities, including a local centre, primary school and marina development, along with appropriate open space. However it would not provide for 5ha of employment development without compromising the provision of one or more of these elements. As such, should Policy 13 make a strategic allocation of the Airfield Farm site as suggested, this criterion would have to be deleted in order for Policy 13 (iii) to be effective and sound. However, there is additional land adjacent to the application site, within the ownership of Hallam Land Management Limited and William Davis Limited, which is suitable for employment development and this is the subject of a separate representation by Hallam Land Management and William Davis Ltd.</p> <p>We consider that the transport interventions listed at Policy 13 (c) set out a clear strategy and are based on a sound concept of how all types of movements should be prioritised in the future development of the town. This will influence the strategies and investment plans of the local authorities and other organisations, as set out in PPS12 at paragraph 4.8. They are based on the considerable transport evidence base that the Council has developed and as such we consider that they are sound.</p>	<p>relevant destinations. In particular, bus route provision will be made within the site.</p> <p>vii) have a distinctive identity, creating a sense of place that maximises the opportunities provided by its location, landscape context and the local built heritage. The relationship with the canal will be taken full advantage of in terms of linkages, uses and design;</p> <p>viii) conform to the principles set out in the concept masterplan in Appendix X to this Core Strategy. This concept masterplan will inform the further development of the proposals, taking into account community consultation.</p> <p>ix) consider the suitability of the provision of a Local Nature Reserve as part of the development (subject to deliverability).</p> <p>The Concept Masterplan attached to this representation is suggested as a basis for the concept masterplan referred to at viii), above.</p> <p>This would make Policy 13 sound because it would make it effective in setting out criteria for the strategic allocation of land to deliver development that is central to the achievement of the Core Strategy. It would also relate the policy to the evidence base of community consultation that exists, making it justified.</p>
2038/191	Langtree Group PLC	<p>Policy 13 states that Market Harborough will develop its role as the principal town for the district and will be the focus for development. This is the appropriate approach to the spatial strategy. However, the development within Market Harborough should allow for sustainable development with delivery of significant levels of housing in the urban areas of the district. The policy states that 1000 dwellings will be located on a strategic Greenfield development to the northwest of</p>	<ul style="list-style-type: none"> • The emphasis should be towards previously developed land in accordance with the spatial strategy. <p>Proposed Change</p> <ul style="list-style-type: none"> • The potential conflict with Policy 1 should be clarified. • The figure of 1200 dwellings should be considered a minimum to be

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		<p>Harborough. This is contrary to an aspect of Policy 1 Spatial Strategy which states that the priority for development will be previously developed land. Policy 13 (a) confirms that of 1200 dwellings, only 150 will be on previously developed land. This approach therefore does not strictly accord with the spatial strategy or national guidance and could therefore be considered an unsustainable approach to development. This element of the policy needs to be robustly justified, as currently drafted it is considered unsound and conflicts with itself.</p> <p>Furthermore, as discussed in response to Policy 2 Langtree believe that the policy on housing delivery in Market Harborough needs to be broadened in its focus. It is ambitious to rely on a single large scale site, when the timescales for its delivery are not confirmed. Market Harborough provides an opportunity for sustainable development in the district and this should be utilised to ensure that housing delivery is provided in the most sustainable and deliverable locations, and to ensure that the document is sound. The spatial distribution of housing should therefore indicate that given Market Harborough's primacy in the District that the 1200 dwellings are not seen as a 'cap' or 'maxima' but are a minimum to be achieved. This approach will deliver flexibility, housing and growth to Market Harborough.</p>	achieved.
2043/244	Stamford Homes Ltd	<p>The Council do not appear to have a clear evidence base to support the proposed urban extension at Airfield Farm for 1,000 dwellings. There has been no thorough analysis or comparison made between the development options available. Three options are identified within the Core Strategy (paragraph 6.11):</p> <p>a. To the south-east of the town; or b. 'Piecemeal' development around the town; c. To the north-west of the town.</p> <p>Option A</p> <p>The south-east option has been discounted without elaboration on a number of issues, notably impact of the railway line, the floodplain and multiple landownership. The impact of these issues are impossible to determine effectively without any details. Ideally a full comparative assessment between the development options and impact of these influencing factors should be undertaken.</p> <p>Option B</p> <p>The piecemeal option is discounted without any assessment, as securing infrastructure enhancements is considered by the Council to be more difficult. On the basis that a suitable contributions schedule is adopted promptly, distribution of the allocations around the settlement has the potential to generate the same levels of financial contributions towards infrastructure. The distribution of the development and any associated additional pressure created on supporting infrastructure is such that it may cause less stresses and strains and enable more effective utilization of existing localized capacity. Such a solution could be beneficial and more sustainable, but this has not been evaluated before being discounted.</p> <p>Option C</p> <p>Development to the north-west of the site, on land known as Airfield Farm, is the Council's preferred option for development. However, there is very little justification supporting this site selection.</p> <p>It is only in terms of the Landscape Character Assessment that an appraisal of all land parcels/development options around Market Harborough has been carried out. However, the two landscape assessments contain a number of errors/ambiguities, whilst also not clearly identifying why the selected SUE is the preferred option.</p>	<p>Full assessment of supporting evidence base for the Market Harborough SUE options (north-west, south-east, piecemeal on smaller sites). This should incorporate a transparent assessment comparing each of the options, in order to determine the most appropriate location.</p> <p>In order to enable a full SUE assessment, the supporting evidence base needs to be complete and sound in itself. This should include further landscape character assessment, without pre-determined ideas for the location of development, and a completed highway model for all Market Harborough development options.</p>

The highways assessment also raises similar queries. The issues with these two key assessments are outlined below.

Landscape Character Assessment

The Landscape Character Assessment should be one of the key studies underpinning the formulation of the LDF. This has been undertaken in two stages: a District wide assessment in September 2007 and an update/re-assessment of the Market Harborough fringe area in April 2009. Both documents incorporate a broadbrush comparison of landscape characteristics and sensitivity, followed by a more detailed assessment on a traffic light system.

Whilst the later study is intended to provide additional detail and a more fine grain assessment, there appears to be some questionable designations and land parcel amalgamations upon the fringes of Market Harborough.

The accompanying Ian Stemp Landscape Associates report assessing the Landscape Character Assessment, draws out the following concerns with the 2009 report:

- 1.□The two Council commissioned Landscape Character Assessments have been prepared by two highly regarded landscape practices. It is therefore confusing that the two assessments have identified the capacity of the same land parcels so differently. This includes completely opposite conclusions for land parcels 5, 24, 27, 33 and 34A (as identified in the 2009 assessment). Such extreme differences in the analysis suggest that there must be a fundamental flaw in these assessments.
- 2.□The methodology used does not provide consistency through the stages in the manner in which it has been applied. Typically, one would anticipate the higher the sensitivity in Stage 1 (course-grain landscape character areas), the lower the capacity to accept change in the form of development. Some larger land parcels identified as having a Moderate/High sensitivity rating in Stage 1 (e.g. Character Areas 8 and 9) have been identified as having a Medium/High capacity for development in stage 2 (e.g. Areas 33 and 34A). This is the converse of that anticipated, which results in the assessment process being questioned.
- 3.□The range of suitability of development parcels in Stage 2 within the same landscape character areas (Stage 1) vary greatly (e.g. from Low (parcel 15) to High (parcel 1) for Character Area 2). Whilst subsidiary functions of the landscape exist, the level of variety generated within similar land parcels is still much greater than expected. Determination of assessment criteria categorisation is a subjective matter and is one that has not been sufficiently explained to enable the variation in development potential between land parcels within the same landscape character area.
- 4.□Certain sites extend beyond the crest of the valley in which Market Harborough is located. They would therefore be highly prominent, and thus are likely to be inappropriate. Sites 5 and 34A are two such sites, but are both considered Medium/High development potential. There is a duality in the character of these sites as they extend over the crest of the hills. This undermines the finer grain analysis of the landscape character of the fringes of the town, as sites have not been appropriately subdivided in terms of character and impact. These two sites should not therefore be considered to have a development capacity of Medium/High.
- 5.□The report amalgamates land parcels that were previously considered independently in the first study. This contradicts the finer grain approach being sought by the updated document,

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particularly where the suitability for development of the land parcels amalgamated were different. There are three notable examples:

- A. □ Area N, subsequently amalgamated with part of Area M – now called Area 26 in 2009 study; and,
- B. □ Area L, subsequently amalgamated with part of Area K – now called Area 24 in 2009 study.
- C. □ Area P in the 2007 study, subsequently amalgamated into previous Area Q – now called Area 35 in 2009 study;

The first two examples effectively include additional land within the higher development potential category previously identified. Surprisingly, this does not reflect negatively on the development potential of either land parcel.

The third example though incorporates a downgrading of Area P’s development potential, due to being grouped in with adjacent parcels. This coarser grain analysis has significantly altered the development potential of this land, as the wider effects of the larger land parcel mask the potential of developing a smaller area

Creating a coarser grain analysis through the more recent landscape character assessment (in direct contrast to the stated aims of the 2009 assessment) has created rather than reduced difficulties in identifying suitable development options for the LDF.

Importantly within this assessment, there are three key elements that emerge to seriously question the selection of Airfield Farm as the SUE location:

1. □ The 2007 assessment considered the fringe land around Market Harborough. This did not include a large proportion of Airfield Farm, clearly indicating that this site was not considered to be visually linked with Market Harborough. This supports the view that the SUE may be more akin to a new settlement rather than an extension to Market Harborough. The sustainability of such an allocation is therefore questionable as it is not of a sufficient size to be self-sufficient.
2. □ Approximately half of the Airfield Farm site was not assessed within the 2007 assessment, as it was not considered to be a fringe site to Market Harborough. The half assessed was considered ‘unsuitable for development’. The 2007 report concluded that the land within Airfield Farm (where assessed) is “exposed to open views, particularly from the north” and that “mitigation could not reduce these impacts significantly enough”. It can therefore only be concluded that the sprawling nature of this land beyond the natural valley contours of the Market Harborough basin will have a significant impact upon the settlement’s wider context and setting.

The only parcel of land adjoining Airfield Farm considered to have ‘potential for consideration for development’ within the 2007 assessment, was a small slither adjacent to Leicester Road (Area R). This land is under different ownership (excluded from Airfield Farm SHLAA representations) and appears to be excluded from the proposed SUE.

3. □ The 2009 assessment reclassifies the whole of Airfield Farm as having ‘medium’ capacity for development (parcels 39, 40, 41 and 42). This is the most frequent categorisation of land around Market Harborough, and there is nothing to differentiate why these land parcels are more appropriate for development than alternative ‘medium’ land parcels. Additionally, there are 14 parcels of land categorised ‘medium/high’ or ‘high’. These should be considered in preference to Airfield Farm from a landscape perspective. These largely relate to development towards the south-east (growth Option A for Market Harborough as outlined above) or distributed around the

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		<p>edge of the settlement (piecemeal development Option B). In the absence of any other true comparative assessments it is therefore difficult to understand how selection of Airfield Farm (north-west Option C) is selected as the preferred option within the Core Strategy.</p> <p>Highways Assessment</p> <p>There are three key points with regards to the supporting highway information:</p> <p>1.□The initial assessment, undertaken in May 2009, considered the impact of development options on a number of key transport nodes within Market Harborough. This basic analysis concluded that the south-eastern SUE resulted in lower levels of traffic in the town centre than the north-western option (Airfield Farm) (section 7.1.2). By the document's own admission though, the model is not completely reliable, and a revised model was to be prepared. Additionally, there appears to have been assumptions made which are not necessarily correct. This includes the provision of a link road between Leicester Road (B6047) and Harborough Road (A4304) for the north-west SUE, a position that has been subsequently tested through the revised model and considered to have little benefit to through traffic. Removal of the link road from the original modelling exercise will, however, strengthen the case for selecting the south-east option, as additional traffic, however small the increase, will pass through the town centre compared to the current calculated traffic rates referred to in the 2009 assessment.</p> <p>2.□The updated model has not been finalised, and is unlikely to be available until early 2011. This is beyond the end of the consultation period for the Harborough Core Strategy. This cannot be considered acceptable, as there will not be an opportunity for public evaluation/comment prior to the Core Strategy Examination.</p> <p>3.□The interim assessment model run by the Council and published in August 2010 (An Assessment of Transport Impacts of Alternative Development Scenarios at Market Harborough) is identified only as being a 'stop gap' until the final model can be run (para. 2.1). This model is only being created to assess development options for the north-west SUE (Airfield Farm). No further assessment appears to be scheduled for alternative locations. This completely undermines the rationality for selecting the north-western option for the Market Harborough SUE, as no reasonable alternatives have been evaluated, as stated as necessary within paragraphs 4.36, 4.38 and the box accompanying paragraph 4.52 of PPS 12.</p> <p>On the basis that there is insufficient evidence to indicate whether development in this location would function as an extension to Market Harborough or a new settlement, coupled with a lack of comparable evidence to identify this as the most appropriate location for new development around Market Harborough, the resultant policy is not sound. With the current evidence base, the proposal is therefore not justified and thus fails to comply with the Tests of Soundness as set out in PPS 12.</p>	
2051/308	The Theatres Trust	We find the document to be legally compliant and Sound with special regard to Policy 13 d) ii) which we hope includes the Harborough Theatre.	
3646/314	British Waterways	This policy identifies an area of land to the north-west of Market Harborough as a Strategic Development Area to accommodate approximately 1000 dwellings. The Market Harborough Arm of the Grand Union Canal runs along the eastern edge of this area and British Waterways (BW) supports the intention in Policy 13 b) v) to secure an appropriate relationship with the canal in any development here, considering linkages, uses and design. We consider that the canal can	

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		<p>provide valuable green infrastructure which can help integrate the development into the landscape and create a link with the existing town, providing a pedestrian route along the towpath into the town. We are pleased that the Policy acknowledges the importance and sensitivity of the canal as a significant feature in the landscape, and that it seeks to ensure that the development is properly integrated with the canal at the same time as protecting the character of the canal corridor. The intention in this policy to positively utilise the potential that the canal offers reflects the Government's desire to see the inland waterways maintained and developed in a sustainable way so that they fulfil their social, economic and environmental potential (Waterways for Tomorrow, Defra 2000), and the advice and guidance contained in the TCPA's Policy Advice Note: Inland Waterways (July 2009).</p>	
2055/364	Leicestershire County Council	<p>No evidence has yet been produced to demonstrate that it is possible to deliver in practice a strategic development area of 1,000 dwellings to the North West of Market Harborough without causing a significant deterioration in travel and environmental conditions in the town. The transport work to date (undertaken by ARUP) has largely been at a broad level, and in the case of Market Harborough based on manual methods. Thus, the transportation impacts on the town of alternative options for housing growth and supporting infrastructure have not yet been considered in any detail. In turn, this has meant that there has been no comprehensive comparison of the merits or otherwise of alternative options, drawing together a broad range of indicators (e.g. environmental, flooding, transportation etc.) to determine whether any one option has clearer overall benefits for the town as a whole. The highway authority has not seen any evidence to suggest that a development of the scale and location proposed will be able to deliver, support and sustain a level of facilities and services that would genuinely encourage travel other than by private car and would minimise the need to travel external to the site. See also comments relating to Policy 13 c).</p>	<p>The Core Strategy should be underpinned by a more thoroughly developed transportation evidence base in respect of Market Harborough. In the absence of this evidence the District Council should review the balance of housing provision between Market Harborough and the Scraftoft/ Thurnby/ Bushby area.</p>
2055/365	Leicestershire County Council	<p>To be read in conjunction with previous comments in respect of Policy 13 and the general principle of development to the North West of the town. In respect of Policy 13 c), the highway authority is not aware of any evidence at this time to suggest whether the measures identified in this Policy are appropriate and what might be feasible/deliverable in practice, given the location and scale of the proposed strategic development area and the constrained nature of the town centre and its road layout. In addition, the Policy fails to talk about 'smarter choice' measures (e.g. personal travel planning, bus information and ticket provision), which in themselves can be costly to implement. The relatively detailed content of Policy 13 c) is at odds with the limited content of the Infrastructure Plan.</p>	<p>The Core Strategy and Implementation Plan should be underpinned by a more thoroughly developed transportation evidence base.</p>
2056/383	Trustees of the Bowden Settlement	<p>The Trustees of the Bowden Settlement support the identification of Market Harborough as the principal town within Harborough District providing the main focus for additional development. However, the Trustees object to the identification of land to the north west of the town as "the principle means of accommodating housing growth on greenfield land in Market Harborough".</p> <p>The proposed strategic development area is located some distance from Market Harborough town centre. The site is not well related to the existing urban edge of the town and is considered an unsustainable location for the additional 1,000 dwellings proposed. The Council has failed to undertake a full and comprehensive assessment of the alternative options for growth in Market Harborough; the robustness of the limited evidence supplied to attempt to justify the location of the strategic development area is also questioned. The identification of the strategic development area to the north west of Harborough, and consequently Policy 13, is therefore considered unsound as it is not 'justified'. In seeking to define the strategic development area, the Council has placed great weight on the findings of the Harborough District Landscape Character</p>	

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Assessment. Paragraph 6.11 which supports Policy 13 states that the “sensitivity and limited capacity of the surrounding landscape” as identified in the Landscape Character Assessment “suggests that the only two options to accommodate such growth are focused into two key areas: to the north west of the town: or to the south east”. The Landscape Character Assessment excluded the land to the north west of Market Harborough from the assessment. Land to the south east was also not assessed in the exercise. It is not clear how the conclusion regarding the landscape quality has been derived and therefore what evidence base supports the identification of the location of the strategic development area in Market Harborough.

It is considered that a full reassessment of the options form growth in Market Harborough should be undertaken in order to ensure a sound plan. In so doing, a number of smaller, more sustainable extensions which are better related to the town and its existing services and facilities should be considered. One such site is land to the north of The Ridgeway, immediately adjacent to The Ridgeway Primary School. The site is well contained by existing mature landscaping and well connected to existing built up area of Market Harborough and local services and facilities. The benefits of the site as a smaller urban extension will be promoted through the Allocations DPD. In addition to the above, the Trustees are concerned over the extent of the separation boundary between Great Bowden and Market Harborough as referred to in Point f) of Policy 13: Market Harborough. The Trustees understand the importance of ensuring the retention of the identity and distinctiveness of neighbouring settlements and note the reference to the strong community support for such a measure, as contained in supporting paragraph 6.19. However, it is considered that applying a broad brush designation between the settlements is not the most appropriate strategy and that a sensible, more reasoned approach, based on sound and credible evidence needs to be taken in defining the area of separation.

In determining the extent of the separation boundary reference should be made to a landscape character assessment. However, concern is raised over the credibility of the Harborough District Landscape Character Assessment, in particular its ability to assess sites on an equal basis. As it is currently written, Point f) of Policy 13 is not ‘justified’ and therefore unsound as it is not founded on a robust and credible evidence, nor considered to be the most appropriate strategy when considered against alternatives.

In defining the extent of the separation area between Great Bowden and Market Harborough it is considered that the small parcel of land directly to the west of The Ridgeway Primary School should be excluded from any defined area of separation. The land is bounded by development to the east, south and west and well contained to the north by mature planting. Due to the enclosed nature of the site, the development of this small parcel of land would not encroach on Great Bowden nor compromise the setting or distinctiveness of either settlement.

2057/386 AMOS

AMOS support the identification of Market Harborough as the principal town within Harborough District providing the main focus for additional development. However, the Trust objects to the identification of land to the north west of the town as “the principle means of accommodating housing growth on greenfield land in Market Harborough”. The proposed strategic development area is located some distance from Market Harborough town centre. The site is not well related to the existing urban edge of the town and is considered an unsustainable location for the additional 1,000 dwellings proposed.

The Council has failed to undertake a full and comprehensive assessment of the alternative options for growth in Market Harborough; the robustness of the limited evidence supplied to attempt to justify the location of the strategic development area is also questioned. The identification of the strategic development area to the north west of Harborough, and

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		<p>consequently Policy 13, is therefore considered unsound as it is not ‘justified’. In seeking to define the strategic development area, the Council has placed great weight on the findings of the Harborough District Landscape Character Assessment. Paragraph 6.11 which supports Policy 13 states that the “sensitivity and limited capacity of the surrounding landscape” as identified in the Landscape Character Assessment “suggests that the only two options to accommodate such growth are focused into two key areas: to the north west of the town: or to the south east”. The Landscape Character Assessment excluded the land to the north west of Market Harborough from the assessment. Land to the south east was also not assessed in the exercise. It is not clear how the conclusion regarding the landscape quality has been derived and therefore what evidence base supports the identification of the location of the strategic development area in Market Harborough.</p> <p>It is considered that a full reassessment of the options form growth in Market Harborough should be undertaken in order to ensure a sound plan. In so doing, a number of smaller, more sustainable extensions which are better related to the town and its existing services and facilities should be considered. One such site is land to the north of Kingston Way to the north of Market Harborough. The site is well contained by existing mature landscaping and well connected to existing built up area of Market Harborough. The benefits of the site as a smaller urban extension will be promoted through the Allocations DPD.</p>	
2061/398	Pilkington Trust	<p>The Pilkington Trust support the identification of Market Harborough as the principal town within Harborough District providing the main focus for additional development. However, the Trust objects to the identification of land to the north west of the town as “the principle means of accommodating housing growth on greenfield land in Market Harborough”.</p> <p>The proposed strategic development area is located some distance from Market Harborough town centre. The site is not well related to the existing urban edge of the town and is considered an unsustainable location for the additional 1,000 dwellings proposed. The Council has failed to undertake a full and comprehensive assessment of the alternative options for growth in Market Harborough; the robustness of the limited evidence supplied to attempt to justify the location of the strategic development area is also questioned.</p> <p>The identification of the strategic development area to the north west of Harborough, and consequently Policy 13, is therefore considered unsound as it is not ‘justified’. In seeking to define the strategic development area, the Council has placed great weight on the findings of the Harborough District Landscape Character Assessment. Paragraph 6.11 which supports Policy 13 states that the “sensitivity and limited capacity of the surrounding landscape” as identified in the Landscape Character Assessment “suggests that the only two options to accommodate such growth are focused into two key areas: to the north west of the town: or to the south east”. The Landscape Character Assessment excluded the land to the north west of Market Harborough from the assessment. Land to the south east was also not assessed in the exercise.</p> <p>It is not clear how the conclusion regarding the landscape quality has been derived and therefore what evidence base supports the identification of the location of the strategic development area in Market Harborough. It is considered that a full reassessment of the options form growth in Market Harborough should be undertaken in order to ensure a sound plan. In so doing, a number of smaller, more sustainable extensions which are better related to the town and its existing services and facilities should be considered. One such site is land immediately to the west of the Farndon Road development which is currently under construction. The site is a logical extension to the town being well connected to existing built up area of Market Harborough and local services and facilities. The benefits of the site as a smaller urban extension will be promoted</p>	

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		through the Allocations DPD.	
2011/49	Limetree Real Estates	<p>(Para.6.19) Looking at the ways in which the additional growth envisaged for Market Harborough will be delivered, whilst the provision of a small amount of employment land within a sustainable urban extension would be supported, however, the timing of the delivery of this provision is questioned as it is part of a large development project which has significant lead-in time. Furthermore, the location of this site for employment is considered to be inferior to the land west of Rockingham Road, Market Harborough, which is the subject of the enclosed Promotional Document, in relation to its location in close proximity to existing employment sites, the A6 and the A14.</p> <p>Market Harborough's role as a focus for employment development is supported, however, as suggested in a previous representation, the allocation of only 5 hectares of additional employment land for Market Harborough is somewhat restrictive, particularly in advance of a review of existing employment sites and allocations that have not been taken up. The provision of 5 hectares of additional employment land is justified by the HELS despite the fact that 12 hectares of additional employment land was developed per annum between 2001/2 and 2007/8 (see paragraph 2.21 of the Core Strategy document). Furthermore, the suggestion that proximity to areas of significant housing growth or to the north west strategic development area should be a consideration in the location of new employment land allocations is not justified by technical evidence or analysis of viable alternative sites such as the land west of Rockingham Road, Market Harborough.</p> <p>The suggestion that a separation area between Market Harborough and Great Bowden be designated is supported on the basis that it is located in the area indicated on the Key Diagram rather than being extended without further consultation or the existing designation in the Local Plan being carried forward without review.</p>	<p>Amend criterion e) to suggest the allocation of 5 hectares of additional employment land for the development of Market Harborough together with the sum of any unimplemented employment allocations from the Harborough District Local Plan.</p> <p>Amend criterion e) to delete reference to the proximity to areas of significant housing growth or to the north west strategic development area being a consideration in the location of new employment land and refer instead to development being located in sustainable areas of the town such as the land west of Rockingham Road, Market Harborough.</p> <p>Amend criterion f) such that the separation area between Market Harborough and Great Bowden be designated as indicated on the Key Diagram.</p>
2064/423	Persimmon Homes North Midlands	<p>Policy 13(a) Housing Requirement Representations have been submitted in respect of Policy 2 which propose that for the Core Strategy to be sound, the time horizon of the Core Strategy should be extended to 2028 to take account of the requirement to plan for at least 15 years set out in PPS12 and that the housing requirement is increased accordingly (also including a 10% non-implementation rate for existing commitments). The submission proposes that the amount of housing to be allocated to Market Harborough should be 2,100 over the plan period 2006 – 2028, reflecting the role of Market Harborough and potential capacity in the town.</p> <p>The increased provision would be accommodated in a larger strategic development area of 1,500 houses and through a range of smaller sites in and on the edge of Market Harborough. This would allow continuity of supply and housing choice for the town.</p> <p>At present the Core Strategy only allocates an additional 200 dwellings to Market Harborough above the proposed strategic allocation. This is considered to be inconsistent with the role of the town within the district and the focus given to it in the East Midlands Regional Plan. Our revised figures would enable 600 dwellings to be provided in an adjacent to Market Harborough over the plan period which is considered more appropriate to settlement.</p> <p>The draft 2010 SHLAA update identifies a total of 1,953 new houses on potentially developable sites in addition to existing commitments. It is our view that there is further scope for additional sites to be considered developable.</p>	<p>The Core Strategy should be planning for approximately 2,100 dwellings in Market Harborough over the plan period 2006 – 2028 to ensure that it is justified, effective and consistent with national policy.</p> <p>Sentence 2 of Paragraph 2 of Policy 13(a) should be amended as below to ensure that it is sufficiently flexible to deal with changing circumstances and can meet the test of effectiveness.</p> <p>“At least 150 of which will be on previously developed land, and a target of 30% or 360 dwellings will be negotiated to be subject to affordable tenures, taking into account site viability and the housing needs of the area.”</p>

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		<p>This includes site M020/09 (Land at Waterfield Way, Market Harborough) which could accommodate 50 houses. It is presently excluded from future supply due to the conclusions of the Harborough Landscape Character Assessment (LCA), which rates the area as having low/medium capacity to accommodate development. The LCA, however, assesses the wider area which includes the gardens of Mount Cottage, the Mount Cottage Mews and land to the north of the school playing fields. The area beyond the boundaries of the Waterfield Way site has a different role to play in the landscape setting to the town and should be distinguished from the site. Considered on its own merits, a landscape appraisal by Pegasus Environmental undertaken on behalf of the developer finds that the site is set below the ridgeline and is suitable for residential development without a harmful impact upon the landscape.</p> <p>An additional suggested site is site M74/09 (Land to the east of Northampton Road, Market Harborough) which could accommodate in the region of 300 dwellings. This site is excluded from SHLAA as a suitable site due to concerns about accessibility given that there is no direct road frontage. The developer is, however, confident that access is achievable through the adjoining industrial estate and that the site is developable.</p> <p>The inclusion of both of these sites within the potential supply would add another 350 dwellings to help in meeting the requirements for housing growth in the town over the plan period. This in turn demonstrates that the 600 dwellings proposed for the rest of Market Harborough can be delivered at the town over the plan period.</p> <p>Affordable Housing Representations have been made in respect of Policy 3 Affordable Housing of the Core Strategy. In particular that policy was considered to be unsound because it is not effective in respect of it being deliverable and flexible. The same comments apply to the affordable housing requirements in Policy 13. The policy should be reworded to take account of the potential changing circumstances, particularly in respect of infrastructure requirements which could impact upon site viability and the ability of a development to meet affordable housing targets. This would ensure that the Core Strategy meets the tests of soundness.</p>	
2066/434	Davidsons Group Ltd	<p>The strategy for Market Harborough needs to be reviewed in light of the increased housing requirements necessary to make the Core Strategy consistent with national policy and in light of the capacity of other settlements in Harborough as set out by this practise elsewhere. These changes increase the amount of development still to be identified to 2,100 dwellings in Market Harborough to 2028.</p> <p>In this context the most sustainable way of accommodating this additional growth is by an enlarged strategic development area, of a size able to provide additional facilities as part of the overall development.</p> <p>Whilst the proposed broad location north west of Market Harborough is not unsuitable, in itself it is relatively remote from the town centre and would be improved by better connectedness to the main urban area of Market Harborough.</p> <p>In this context a better solution exists that would provide around 1,500 dwellings as part of a wider area which stretched southwards to the west of Market Harborough, retaining the separation between Market Harborough and Lubenham, and providing a connection to A4304. The accompanying concept plan demonstrates that this quantum of development can be</p>	Policy 13b should be reworded to refer to 1,500 dwellings to the west and north west of Market Harborough. A masterplan to show how this quantum of development could be accommodated accompanies these representations.

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physically accommodated to the west of Market Harborough having regard to environmental and landscape constraints.

This west and north west solution would have a number of benefits, having regard to the objectives identified for the strategic development area in part 13b):

- i. ☐ The resultant development would have a better relationship to the existing built form of Market Harborough. In this respect a west and north west solution would be better able to be linked to and integral part of Market Harborough. This applies both in terms of function and built form. Functionally, a western solution allows better access to southern areas of Market Harborough and additional pedestrian/cycle links via the canal tow path into the town centre.
- ii. ☐ Residents of a development of around 1,500 dwellings in one location would better be able to support additional facilities in the strategic development. Furthermore, it is likely that this scale of development would be able to provide greater funds for community facilities through developer contributions as well as the Government's New Homes Bonus scheme.
- iii. ☐ Increasing the scale of development around the strategic development area allows new homes to access the employment development that will be provided as part of the proposals.
- iv. ☐ Through good functional relationship with the existing urban area development to the west of Market Harborough would enable good pedestrian and cycle linkages to existing routes to permit access via these modes to the town centre. Development to the west of Market Harborough would also enable road access to the A4303, providing a more logical route for improved and additional public transport services.
- v. ☐ Land immediately west of Market Harborough provides a significant opportunity to create an attractive residential community, taking full advantage of the existing landscape features such as the canal and undulating topography to give the development a distinctive character and identity, creating links to access the canal and surrounding countryside, whilst at the same time protecting the individual identities of the settlements of Market Harborough and Lubenham.
- vi. ☐ It is noted that the proposed means of allocating the site via the Allocations Development Plan Document and an agreed masterplan which is subject to local consultation will mean that there could be a long lead-in time for the development. In this context, delivery of a development of 1,500 dwellings would be very demanding within the plan period. By identifying an area accessed from both the A6 and A4303 it is more likely that multiple developers would be able to practically construct and sell sufficient houses to deliver the entire development by 2028.

2f) With reference to the proposals for a new area of separation between Market Harborough and Lubenham, there is clearly potential to release land immediately west of Market Harborough for development without compromising the sense of separation of these two settlements, particularly given the undulating land form in this location. Indeed, the Council's own landscape character assessment work (Market Harborough Landscape Character Assessment and Landscape Capacity Study) identifies medium capacity for change in most identified parcels to the west of Market Harborough.

This promoter's own landscape evidence concludes in relation to existing built form that "the natural screening of...parcel 35 by local landform creates an area that could be sympathetically developed with little impact on the perceived edge of settlement when viewed from the wider countryside. The land continues west across parcels 36, 37 and 38, and although development in

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		<p>this location would be remote from existing built form it would be screened from properties in Lubenham by intervening landform.”</p> <p>What is clear from available evidence is that the landform in this location is undulating, and that whilst it is important that some areas on higher ground and areas closer to Lubenham should be kept free from development in order to prevent coalescence, other parts of this area could be developed without affecting visual separation.</p>	
2077/474	Mr D Mason		<p>I again suggest to the Council Planners that a north south by pass running to the west of Market Harborough and linking the proposed Airfield Development to the A508 at some point just south of the town would for many years to come prove to be a good asset in every respect; in particular providing traffic relief to the town centre.</p>
2080/481	Mr P Maxwell	<p>Whilst I understand and accept the need for the provision of further homes in the MH area, the case for basing this on 1000 homes on one particular site is not, in my view, made in the Core Strategy.</p> <p>(Incidentally, can you tell me whether, in the event of the Government's Localism Bill passing into Law, the future of any such development would become a matter for the residents of the local Ward to decide?) Reference is made to a "new community", Policy 13 b) 1) and yet later, at b)ii) reference is made to the provision of " ... a range of community facilities, primary school ... If sufficient evidence of need exists". This is hardly the way to build or develop a community. You need to ensure that the infrastructure is built with the development not after it. There are fine words about transport but existing services in the area are deteriorating. Eg No bus service to Leicester in the evening. The 44 bus service to MH Town Centre and railway station operates hourly, East Midland Trains has indicated that it wishes to reduce the frequency of rail stops at Market Harborough. All of this accentuates the likely continued heavy use of the car in the area. Although I am not a planner, looking around MH you might imagine 1000 homes generating say, 1000 school children and 1500 cars. Even if a new Primary School is provided, secondary school children will be expected to go to Schools in Weiland Park Road and Burnmill Road. Otherwise they will go further afield with potentially yet more car journeys. I cannot comment on the capacity of the Secondary Schools to accommodate additional children but the roads are hardly adequate now. Only today, travelling along Burnmill Road, buses had to stop in the middle of the road to drop passengers.</p> <p>Parked cars make it impossible for buses to pull in at bus stops near the school. Many of these belong to pupils and consideration might be given to asking this captive group where they live and why they don't use public transport, cycle or walk to school. Their answers could provide another insight into a growing problem, bearing in mind that they are, by definition, at the beginning of their motoring careers.</p> <p>Traffic generally in Leicester Road will increase significantly both there and in the Town Centre. The impact of additional vehicles through Great Bowden and Alvington Way will, in my view, also be substantial. From personal experience, I can tell you that these "rat runs" are already used heavily by people wanting to travel to Corby and Kettering from North of the Town. Vehicles could travel first to the MacDonald's Roundabout on the A6 and then turn right but my experience is that by and large they don't. Simply suggesting that walking and cycling routes will be encouraged will not solve the traffic problems which the development will bring. Looking at Leicester Road today, is it really possible to develop an improved cycle path to Town? And when would it happen? If you look at experience in Lubenham where following a tragic accident there has been pressure, with some money raised, to provide a cycle route to school and to improve the</p>	

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		<p>pavement at the point of the accident, a number of years (3?) have passed and there is still no sign of the desired improvement.</p> <p>Without wishing to seem too cynical, the track record from the past does not suggest that facilities such as this would get a higher priority in the future. Reference is made to "discouraging peak hour traffic". How is it proposed to do this? The driver is a particularly inventive person and I doubt whether the planner can change the driver's habits without incentives, like good, frequent, cheap and timely public transport going to where they want to go. It is possible that I have underestimated the significance of references at paras 6.17 and 6.18, but can't these be turned round such that until "improved services and facilities are guaranteed and timetabled the development cannot go ahead".</p> <p>I could find no reference in the Strategy to hospital provision or even to the possible increased demand for such services. Reference is made to GP provision but interestingly both Health Centres are remote from the proposed development. This seems to have been completely ignored. Surely the Strategy should be making clear the important need for the improved range of Health facilities and provision in the Town/District. I could not see in the Strategy any references to changing demography. In particular, is it anticipated that the age balance will remain static or what? Again my guess is that we shall have an ageing population. If this is correct, I feel the Strategy should make reference to it and to the likely change in demand for facilities and services etc. We, rightly, worry about the adequacy of school provision but what about growing numbers of older people, their needs and the possible increase in the number of under occupied properties etc. The Core Strategy is an important blue print for the next 10/15 years. I regret that it does not have more vision of what it wants to achieve in terms of quality of life etc for the residents. The question that has to be asked, therefore, is if the Plan is fulfilled, will Harborough District be a better or worse place? On the basis of the draft I think that the best that can said is lithe Jury is still out". To be convincing a Core Strategy has to answer this in the affirmative.</p>	
2081/528	Bitteswell Parish Council	<p>Paragraph 6.7 announces the intention for 1200 dwellings to be provided in Market Harborough and states that the lower bound level of 150 dwellings are to be built on previously developed land, or 12.5%. As the Market Harborough development represents the largest concentration of dwellings to be provided in the Plan Period, the prospective number of dwellings to be sited on PDL is lamentably low. It is suggested that the options for elevating this number to a value closer to the national target of 60% be re-examined.</p>	
2085/570	Natural England	<p>Natural England supports this policy as although there is obviously a negative impact of building this large development partly on greenfield land resulting in the loss of open countryside, we acknowledge that the policy does incorporate mitigation measures which will result in some positive outcomes for green infrastructure provision, biodiversity enhancement and landscape protection. We particularly support the provision at point a (iii) that locations have been chosen which respect the sensitivity and limited capacity of the landscape surrounding Market Harborough.</p> <p>We also support point (bv) which takes account of landscape setting and local distinctiveness and point (vii) which considers the provision of a local nature reserve.</p> <p>We also support paragraph 6.9 and 6.10 that full consideration has been given to the Market Harborough Landscape Character Assessment (2008).</p>	

Policy 14 Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2028/127	Hallam Land Management	<p>We support the role of Lutterworth as a Key Centre. The range of facilities and excellent communications will enable the town to prosper in the future. However, we consider that there should be a stronger focus on new employment allocations at Lutterworth to address future needs based on:</p> <ul style="list-style-type: none"> • The need to better balance the town to support the proposed 500 new dwellings up to 2026 • The need to accommodate relocated employment uses from Leicester Road, as detailed in paragraph 6.26 of the Core Strategy (Publication Version) consultation document. • The need to reallocate employment land which failed to come forward from the Local Plan. The consultation document supports the principle of growth at Lutterworth and allocates 500 dwellings over the plan period. However, this should be supported by further employment allocations to the south of the town. Lutterworth has a limited supply of brownfield land and therefore greenfield allocations will be required. This will better support and sustain the town, leading to greater inward investment. As the consultation document correctly identifies, the district is surrounded by a number of competing centres, further reinforcing the need to allocate employment land to support the local economy. <p>We further support the principle of relocating employment uses from Leicester Road, by providing opportunities to the south to reduce traffic movements through the town. However we consider that such opportunities (to relocate) should be made early on in to the plan period, as failure to provide such, may lead to the relocation of companies out of the town. It is therefore vital to retain employers in Lutterworth by providing land which meets their needs and requirements.</p> <p>We also note that not all of the employment allocations from the Local Plan have come forward, in particular land to the south of Coventry Road, extending 4.4 hectares. Over the same period, housing has been delivered from a variety of sources including allocations and brownfield sites. There has been an over supply of housing without the supply of employment land to better balance jobs with housing growth. We consider that this imbalance should be addressed by providing further greenfield employment allocations to the south of Lutterworth.</p> <p>Failure to do so may create a dormitory town; unable to retain employers or attract inward investment. Therefore while we support the overall approach of Policy 14, we consider that there should be a stronger focus on delivering employment opportunities early in to the plan period. Development south would reduce traffic movements through the town and attract potential occupiers because of the excellent accessibility to the road network. The principle of employment growth in this location is supported throughout Policy 14 of the consultation document, which we firmly support.</p>	
3684/161	Dunton Bassett Parish Council	Policy 14 (a) Lutterworth – ‘Development of Greenfield land to the north of Lutterworth’ Dunton Bassett Parish Council strongly feels that large development of the above land would have serious traffic implications to junctions on the A426, which are already at high capacity.	Policy 14 (a) Lutterworth – ‘Development of Greenfield land to the north of Lutterworth’ Dunton Bassett Parish Council strongly feels that large development of the above land would have serious traffic implications to junctions on the A426, which are already at high capacity.
3607/257	Mr J Turner	The decision to reject the Eastern Relief Road as prohibitively expensive is based on the specific route identified in the 2008 County Council report. This route was a notional one & it has since been acknowledged that other cheaper & more effective routes exist. The Eastern Relief Route option should not be ruled out until there has been an examination by the County Council of alternatives. If this is not done then land may well be allocated for development that should really be reserved for an Eastern Relief Road.	The Eastern Relief Road should not be abandoned as an option to be taken forward until it is clear that all potential routes are prohibitive in terms of cost. This would not be inconsistent with proceeding with other proposed strategies in tandem with the resolution of the routing issue regarding the Eastern Relief Road.

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3607/258	Mr J Turner	Support business development to the south of the town but I am concerned that the visual impact of such development may be detrimental, particularly when viewed from the south & south-west. Development must be sensitive in terms of design & landscape impact.	
3607/259	Mr J Turner	The major warehousing employers adjacent to Lutterworth are based at Magna Park & they are already subject to a routeing agreement that keeps them from travelling through the centre of Lutterworth. This agreement should certainly be extended but, of itself, will do nothing to reduce existing traffic movements through Lutterworth.	Support needs to be given to routeing schemes that relate to aggregate & waste lorries that use Lutterworth on their way to & from the quarry & landfill site operated by Lafarge Aggregates & others at Shawell. This would have a significant beneficial impact on HGV volumes through Lutterworth & consequently on air quality in the AQMA.
3620/296	Lutterworth Town Council	The proposals meet the aims contained within the Business / Economy section of the Lutterworth Town Plan 2010 to improve the viability of Lutterworth as a market town and to provide a broader distribution of skills within the town's employment profile.	
3620/297	Lutterworth Town Council	Policy 14 (b) Whilst this proposal is supported, the relocation of industry to the south of the town must be sensitively managed so that the development does not adversely affect the character of Lutterworth's landscape	
3620/298	Lutterworth Town Council	To state that the cost of an Eastern Relief Road is prohibitive is not justified as this statement is based on the judgement of a single Eastern route option that was identified via the Lutterworth Traffic Study 2008. Lutterworth Town Council is very concerned that the County Council will make judgements on the basis of the notional route identified in the 2008 report. Alternative routes that are both shorter and more cost effective are available and need to be considered as a matter of urgency. Failing this, the Local Development Framework will be finalised without any firm proposal to resolve Lutterworth's traffic problems and its status as the only Air Quality Management Area in south-west Leicestershire.	It is essential that, in the context of Harborough District Council's Local Development Framework process, all Eastern route options be considered and costed by Leicestershire County Council for diverting traffic away from Lutterworth town centre, otherwise there is a very real danger of residential or industrial development being allocated in areas that could prevent an Eastern route from being established.
3620/299	Lutterworth Town Council	The distribution of housing is not justified. Whilst in support of 500 dwellings for Lutterworth, it is difficult to understand how the tenure distribution has been identified. Evidence is required to support this proposal as well as further detail concerning the mix and tenure of housing that is to be developed.	Evidence is required to support this proposal as well as further detail concerning the mix and tenure of housing that is to be developed.
3620/301	Lutterworth Town Council	Whilst this proposal is supported, consideration must also be given to routeing schemes for HGVs that are travelling to the landfill sites, Shawell quarry and the anaerobic bio-digester unit that are all in close proximity to Lutterworth.	
2050/305	William Davis Ltd	<p>William Davis support Policy 14 and the identification of Lutterworth as a Key Centre for the district. We consider Lutterworth to be a highly sustainable settlement in an ideal location for future development, supporting its role as a Key Centre in Harborough with the allocation of 500 dwellings in the Town.</p> <p>We also support the identification of the development of Greenfield land to the north of Lutterworth in section (a) of the policy. William Davis Ltd have an interest in land to the north of Bill Crane Way (SHLAA Ref: Lt006/09) which we believe to be a sustainable location with no major constraints to development, a conclusion shared in the findings of the 2010 SHLAA update.</p> <p>However William Davis object to what we consider to effectively be a sequential approach to development identified in part (a) of the policy which seeks to locate development on Brownfield sites in advance of development on Greenfield sites. As indicated in our response to Policy 1 of the Core Strategy, a sequential approach to development was removed from national planning</p>	<p>William Davis consider that for the housing number in Lutterworth to be delivered in line with PPS3 then the sequential approach to development in the settlement established in Policy 14 needs to be removed. We also consider that the 150 dwellings allocated on PDL sites in Lutterworth within the policy needs to be reduced in line with the findings of Insight Planning's assessment, which highlights that 100 dwellings is a more realistic approach. Therefore part (a) of Policy 14 should be revised to read:</p> <p>“a) 500 dwellings will be provided at Lutterworth of which 100 will be on previously developed land, and at least 30% or 150 dwellings will be subject to affordable tenures. Development will be in the following broad locations:</p> <ul style="list-style-type: none"> • The redevelopment of previously developed land within the existing limits to development for Lutterworth; • Development of Greenfield land within the existing limits to

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		<p>policy back in 2006, being replaced by a focus on delivery. As a consequence the sequential approach to development in Lutterworth proposed in Policy 14 is inconsistent with national planning policy and should be considered unsound.</p> <p>On behalf of William Davis Ltd, Insight Planning Ltd have completed an ‘Assessment of Deliverability of Land for Housing’ in Lutterworth, a copy of which is attached to these representations. The report looks in detail at the amount of deliverable housing land in Lutterworth, including a focus on levels of PDL available for development in the settlement. The conclusions of the assessment clearly demonstrate that insufficient deliverable PDL sites are available in Lutterworth to meet the requirements established in part (a) of Policy 14. Not only does the report highlight that PDL sites will need to be delivered in tandem with Greenfield sites to meet the 500 dwellings target for Lutterworth in the plan, but the report also indicates that the strategy’s commitment to delivering 150 dwellings on PDL in Lutterworth is unachievable. As a consequence the report demonstrates that part (a) of Policy 14 is undeliverable and should not be considered to be justified and sound. In addition to this the report also highlights that insufficient Greenfield land is available within the settlement limits to meet the housing targets, casting further doubt on the proposed sequential approach and highlighting that Greenfield development outside the limits to development will be needed immediately to meet the settlement’s housing targets.</p> <p>In order to provide continuity in housing land supply and to meet the 500 dwelling housing target for Lutterworth the sequential approach to development will need to be deleted. The level of development being directed to PDL will also need to be reduced from the 150 dwellings included in Policy 14, with 100 dwellings being a more suitable level of development on PDL in Lutterworth. This representation should be read in conjunction with Insight Planning’s Assessment, which gives further background to our objection.</p>	<p>development of Lutterworth;</p> <p>•“Development of Greenfield land to the north of Lutterworth.”</p>
2007/33	English Heritage	English Heritage agrees with the findings of the Sustainability Appraisal, which states that ‘the policy has not explicitly acknowledged the presence of a high quality historic environment in Lutterworth’ (Detailed Assessment Matrix) and recommends that ‘The rich and high quality historic environment of Lutterworth should be explicitly recognised and considered by the town-specific policies in the Allocations DPD’ (page VI). We suggest that the Core Strategy should provide the policy context for the Allocations DPD.	<p>The following addition to Policy 14 c) is recommended to reflect HE3.1 of PPS 5, which states that LDFs should ‘set out a positive, proactive strategy for the conservation and enjoyment of the historic environment in their area’: The Council will work with partners to protect and enhance the heritage assets of the town centre, including the conservation area and to implement townscape improvements.</p> <p>An additional paragraph should be added to the Explanation highlighting the ‘rich and high quality historic environment of Lutterworth’ and the potential for enhancement of the town centre, which may be linked to the local traffic calming measures in the town centre (Policy 14 b)).</p>
2055/366	Leicestershire County Council	The locations identified in paragraph a) could be interpreted as a sequential approach to site selection. Whilst paragraph 36 of PPS 3 states that the priority for development should be on previously developed land, a sequential approach to site selection is no longer advocated in this document. Instead, PPS 3 highlights the importance of contributing to sustainable development when identifying locations for housing. Furthermore, the identification of at least 150 dwellings on previously developed land, whilst reflecting the availability of sites highlighted in the SHLAA, is not sufficiently flexible to meet the requirements for Core Strategies as set out in PPS 12. This target relies upon the brownfield SHLAA sites coming forward, and could prevent other sustainable greenfield sites within the limits to development from being delivered.	The Core Strategy should focus upon the importance of having a portfolio of sustainable sites on both brownfield and greenfield sites, where possible within the limits to development.
2055/367	Leicestershire County Council	The overall objective of the delivery of transport interventions within Lutterworth, with the focus on drawing HGV traffic away from the town centre, thereby improving air quality and traffic flow and the principle of locating future HGV generating business development to the south of	Land in the County Council's ownership adjoining the A4303 / Coventry Road roundabout and south of the A4303 is appropriate for employment uses would satisfy this objective. The site would be separated from

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3534/81	Mr A Taylor	<p>Lutterworth, is supported. This would reduce the impact upon adverse traffic conditions within the town centre, whilst still enabling economic growth.</p> <hr/> <p>Whilst it is acknowledged that the Core Strategy document is intended to be an overview set of policies nonetheless given Lutterworth's particular and peculiar traffic problems the absence of the Allocations DPD is a significant drawback to the consultation process. It is to be hoped that it is the Allocations DPD which will provide the detail that will confirm or otherwise, the sustainability of the Core Strategy. Notwithstanding this drawback, Policy 14 (and supporting paragraphs) appears to be bold and imaginative in its approach to dealing with the HGV traffic problem of Lutterworth within the town centre. As such, the policy is to be supported. However, due to the particular nature of the traffic problem being one of internally generated vehicles and through traffic (basically 50/50) any suggested solution does need to be supported by more evidence than appears to be stated in the Core Strategy document. For example, the suggestion to diversify the industrial estates adjacent to the A426 on the north side of the town and relocate to the south of the town, does not include any reference to how this may be proactively achieved. Presumably a carrot and stick approach will be needed but without some reference to 'How' the policy lacks sustainability and soundness. Reference is made in para 6.25 to the eastern route for a bypass and the assumption that no real progress will be made before 2026. However true this may be this longer term solution which is undeniably the most effective means of reducing traffic in the town centre must be safeguarded. The policy for Lutterworth should include a statement along the following lines; No developments will be allowed that would compromise a potential eastern bypass route. Harborough District Council will actively promote an eastern bypass solution with the appropriate traffic authorities and plan ahead for a successful conclusion. There is reference also in para 6.25 to improving junctions to the west of the town. What does this mean in practice? Why has this been included? What would this achieve? There is a concern that including this reference to improving junctions may be a cloak for a Western Relief Road by stealth. Given that the reservation for a Western Relief Road corridor (Policy LW/2 of the adopted Harborough District Local Plan) is clearly no longer included (per para 6.25 and see also Appendix 3 - Lutterworth Policies) clarity about this issue is of fundamental importance as part of the determination of the sustainability and soundness of Policy 14.</p>	<p>residential development, have good access to the A4303 and M1, and would help achieve the overall objective of improving conditions within Lutterworth town centre. Furthermore it is deliverable and would assist in meeting the overall requirements for employment land in Lutterworth.</p> <hr/> <p>Whilst it is acknowledged that the Core Strategy document is intended to be an overview set of policies nonetheless given Lutterworth's particular and peculiar traffic problems the absence of the Allocations DPD is a significant drawback to the consultation process. It is to be hoped that it is the Allocations DPD which will provide the detail that will confirm or otherwise, the sustainability of the Core Strategy. Notwithstanding this drawback, Policy 14 (and supporting paragraphs) appears to be bold and imaginative in its approach to dealing with the HGV traffic problem of Lutterworth within the town centre. As such, the policy is to be supported. However, due to the particular nature of the traffic problem being one of internally generated vehicles and through traffic (basically 50/50) any suggested solution does need to be supported by more evidence than appears to be stated in the Core Strategy document. For example, the suggestion to diversify the industrial estates adjacent to the A426 on the north side of the town and relocate to the south of the town, does not include any reference to how this may be proactively achieved. 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There is a concern that including this reference to improving junctions may be a cloak for a Western Relief Road by stealth. Given that the reservation for a Western Relief Road corridor (Policy LW/2 of the adopted Harborough District Local Plan) is clearly no longer included (per para 6.25 and see also Appendix 3 - Lutterworth Policies) clarity about this issue is of fundamental importance as part of the determination of the sustainability and soundness of Policy 14.</p>
2062/407	Ms R Page	<p>It is recognised that Lutterworth has a high level of HGV traffic by virtue of its position near the motorway. However the statement that traffic impairs the viability of the town is an unproven myth and should not referred to as an evidence base. Lutterworth has 2 major supermarkets, one with 20 000 customers a week and some of the small business have improved trade on a regular basis.</p> <p>500 dwellings of proper mix which would reflect the needs of the community are to my mind acceptable but not without the provision of infrastructure.</p> <p>In fact the strategy does not reflect the need of adequate infrastructure sternly enough.</p> <p>Improving the air quality in Lutterworth is supported however it must be noted that a majority of</p>	

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		lorry movements generate from within the town and 30 % are from the croft quarry (LCC traffic study) which can be alleviated by the provision of a Sharnford by-pass which should be actively supported by this document .	
2072/447	Mr P Hill	<p>Lutterworth is an important town in its fullest respect in the District, and this is recognised by the Council. It has particular challenges and difficulties by virtue of its asset, being strategically so well placed in relation to the major road networks. The locational options for new development are unjustifiably restricted. In particular the identification of land to the north of the town presupposes that alternative solutions are either unacceptable or unavailable, without the opportunity for them to be tested fully.</p> <p>In the same way that the Council is innovatively addressing 'capacity' issues at Market Harborough with the strategic development area at Airfield Farm, the prospect of similar appropriate initiatives at Lutterworth should be positively addressed. Maintaining separation between Magna park, Lutterworth and Bitteswell is understandable. This should not mean, however, that all of the land here, which is extensive, should be precluded from development provided that separation is maintained, and all other relevant development criteria are met. Land within this area is closer to the town centre and schools than to the north of the town, and indeed is further away from Bitteswell.</p>	<p>The policy should delete the reference to the Greenfield land to the north of the town as a priority for development, and should be amended to embrace all possible locations close to and adjoining the built up area.</p> <p>The policy should also be amended to allow for a full and proper assessment of the extent of the separation area proposed at 14e), in the context of identifying Greenfield land for development in line with the Core Strategy.</p>
2081/529	Bitteswell Parish Council	The issue of the justification of need for new dwellings has been identified earlier in this Note. In the case of Lutterworth the District Council should set out comprehensively the justification of their conclusion that there is a pressing or early prospective need for 500 new dwellings in Lutterworth. It is noted that of the 500 dwellings planned for Lutterworth, as for the Market Harborough development, the number to be built on PDL falls materially short of the national target.	
2081/530	Bitteswell Parish Council	The illustration on this page correctly bears the title 'Lutterworth'. The Legend indicates that the settlement boundary is shown on the illustration in yellow. However, the settlement of Bitteswell is also shown in the same colour; this is an error and is in need of correction.	
2081/531	Bitteswell Parish Council	<p>The first paragraph on this page sets out the sequential approach to be adopted in determining the location of the 500 dwellings to be provided at Lutterworth. The last bullet point states: 'if necessary, development of greenfield land to the north of Lutterworth. '</p> <p>In view of the importance to the Harborough District of the asset of rural countryside, an issue that has been amplified earlier in this Note, however, the determination of whether or not the use of this land is 'necessary', and the criteria employed in such determination, should be published for the purposes of scrutiny before any development proceeds.</p>	
2081/532	Bitteswell Parish Council	Paragraph 6.22 proposes measures for improving air quality in Lutterworth by reducing the volume of HGV traffic negotiating the Town. This Council supports these proposals. However, it is considered that Policy 14 should display a more proactive plan for the transfer of the present concentration of industrial/commercial enterprises along the Leicester Road, north of Lutterworth, to locations to the south of the Town. In addition to reducing the throughput of HGV, it would have the benefit of liberating previously developed land for the construction of a significant number of the dwellings planned for Lutterworth. In so doing, it would elevate the District Council's future strike-rate for the use of PDL.	
2081/533	Bitteswell Parish Council	The proposal to utilize the land of the Separation Area for the realization of 'green infrastructure' initiatives is welcomed and supported by this Council.	
2081/534	Bitteswell Parish Council	In the context of strategies aimed at improving air quality by reducing the volume of HGV traffic	We propose that Policy 14 should include an expression of robust support

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		<p>passing through the Town, it should be noted that the Lutterworth Traffic Survey of May 2008 reported that over 30% of heavy truck movements were to and from Croft Quarry. Thus, there would be significant benefit if these trucks were routed away from Lutterworth. It has been acknowledged by the Leicestershire Highway Authority that an effective measure would be the provision of a bypass of Sharnford. In addition to being of advantage to Lutterworth, it would improve the amenity of the residents of Sharnford, Dunton Bassett and Broughton Astley, thereby enhancing the quality of life of thousands of people who live in Leicestershire.</p>	<p>for the provision of a Sharnford Bypass.</p>
2084/565	Mr R Morris	<p>Paragraph 6.25 starts by stating “The policy seeks alternative measures to the provision of a Western Relief Road...” but later states “.to undertake improvements to key junctions on existing routes to the west of the town...” and then “.the opportunity for routing HGV traffic away from the A426. Areas to the south and west of the town provide the best opportunity to accommodate additional HGV...” The second and third statements are assumed to refer to junctions on the abandoned Western Relief Road as there are no other junctions to the west of the town and none to the south. These must be as follows:- · Leicester Road/Bill Crane Way · Bill Crane Way/Bitteswell Road to Bitteswell · Bitteswell Road/Brookfield Way · Brookfield Way/Almond Way · Brookfield Way Coventry Road In other words, these statements suggest resurrecting the Western Relief Road, which has already been abandoned in 2008. Local residents have been protesting against this for over 20 years and this is now putting it back on the table, but in an underhand way without specifically mentioning the WRR. NJ Rushton, of LDC, stated in an e-mail to myself regarding the WRR, on 19/7/2006 that "Sections to the north and south were built in recent years and were known at the time as Stage 1 and Stage 2 of the Western Relief Road. The older section in the middle is closer to housing and is now unsuitable to be used as a Relief Road, particularly for lorries”. Therefore Stage 3 would have to be from the turn offs to Bitteswell and Almond Way i.e joining up the two sections suitable for lorries, not as shown on some plans as only cutting off the corner of Brookfield Way. This route would be totally impractical due to the presence of the water course. Hundreds of houses have been built next to the area, and the footpath adjacent to the road is used by people walking the dogs, mums with kids in prams, people doing sport and kids walking to school. Houses are built within metres of the road, as well as having the Lutterworth County Park, for which the road has to be crossed. That area is a residents area. I have lived on Macaulay Road/Bitteswell Road for 17 years. Initially the Bitteswell Road traffic was acceptable, but since the completion of the Stage 1 and 2 “improvements” it has become unacceptable. I have experienced at first hand the dramatic increase in pollution levels taking the form of fumes, dust, noise and light, not just the gases as measured in the High Street. Some of the worst polluters are the ancient buses used for Lutterworth College. From 0500 to 2200 everyday there is an almost continuous stream of traffic as this is now a short cut to Magna Park. Although there is a 7.5 ton weight limit on the route this is regularly abused and no measures are taken to stop it despite repeated protests. An increase of 1500 trucks a day would be a nightmare. The costing for the alternative Eastern Relief Road outlined to the CC in 2008 was only for the most expensive route, which included a junction onto the M1. The other, cheaper, alternatives without the junction have never been properly costed, to the best of my knowledge.</p>	<p>The statement at 6.25 is, therefore, unsound as it conflicts with 20 years of objections, the suitability of the road in relation to houses, and the abandonment of plans for the WRR in 2008. The only sensible suggestion, as it has always been, is for an Eastern Relief Road. All references to “west of the town” should be deleted in relation to diversion of traffic and HGVs away from the town centre. The statement should also say that all alternative Eastern Relief Road suggestions, not plans, will be thoroughly investigated and costed.</p>

Policy 15 Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
3575/110	Oadby and Wigston Borough Council	The 'Leicester Urban Fringe' is not a term that is widely recognised outside of Harborough district and needs to be defined. Paragraph 6.29 clarifies that the parishes of Thurnby and Bushby and Scraftoft are included within the Leicester Urban Fringe. It then goes on to say that the Leicester Urban Fringe includes 'a predominately rural area immediately adjacent to Oadby, and located in the north east of Harborough District'. However, this area is not defined within the Core Strategy document or on the Key Diagram. The first paragraph of Policy 15 refers to 'development within and adjacent to the Leicester Urban Fringe settlements'. Without a definition of the Leicester Urban Fringe it is unclear which, if any, settlements within the predominately rural area immediately adjacent to Oadby fall within the provisions of this Policy. It is also unclear whether the map on page 92 shows the whole of the Leicester Urban Fringe or just part of it and this should be clarified. Depending on the area it is intended for this map to cover, it may also be useful to show Oadby on the map.	Define 'Leicester Urban Fringe' and clarify whether the map on page 92 shows the whole of the Leicester Urban Fringe or just part of it. Depending on the area it is intended for this map to cover, it may also be useful to show Oadby on the map.
3654/583	CLlr S Galton	The figure of 350 dwellings for this area of the District has been arrived at after careful and detailed consideration of the evidence base supporting the core strategy and public consultation. The strong wish to retain and strengthen long standing policies such as the Green Wedges, the Thurnby/Scraftoft Separation Area and the evidence contained in the Landscape Character Assessment means that there are considerable policy and environmental constraints in this area. Taken together I believe it would be very difficult to accommodate a higher level of development without undermining these crucial policy objectives which have enabled these settlements to retain their separate identity since they were first introduced in the Structure and Local plans in the 1980s. Unlike the west side of Leicester where urban sprawl has been allowed to take place up to and beyond the City boundary, the villages on the east side of the City in Harborough have retained their character and still function as separate communities. They also provide easy access in the form of 'stepping stones' to the Countryside beyond. These issues were highlighted in the consultation on the draft Core strategy when more people from Thurnby and Scraftoft replied than from any other area of the District. The overwhelming response was that they wanted to see the green wedges and Separation Area protected.	No changes required. I believe the document is legally compliant.
3659/587	Mr A Keshwara	Support the proposed review of Green Wedges on the Leicester Urban Fringe, with particular regard to land to the south of Wintersdale Road, Thurnby, which is owned by Keshco Ltd	
2023/97	Mr R Taylor	It is in line with Harborough Core Strategic Objective 5; subject to boundaries not being altered significantly.	
2023/98	Mr R Taylor	It is in line with Harborough Core Strategic Objective 5. Subject to boundary not being altered significantly. If development for leisure is a possible future use, then the area needs to be large enough for people and wildlife.	
2023/99	Mr R Taylor	Local constraints limit the number of houses. We consider that 350 is the absolute maximum number as this area does not have the local facilities and services to cope with more. It represents a 16.5% increase on current numbers. This is a larger increase than those for the other parts of Harborough District, which we believe to be no more than 12.5%. We would have preferred a lower number but realise the constraints on the Planners.	

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3575/116	Oadby and Wigston Borough Council	Support the provision of 350 dwellings on land within or adjoining Scraptoft, Thurnby and Bushby as the element of growth within Harborough District to be located within or adjoining the Leicester Principal Urban Area where development will have least impact on the transport network of south east Leicestershire and within Harborough district, and where there are optimum opportunities to improve public transport links to Leicester. Taking together the Core Strategies of Leicester City, Oadby and Wigston and Harborough the Scraptoft, Thurnby and Bushby area comprises locally the most sustainable location for growth in the context of south east Leicestershire as a whole which will see a Direction for Growth of 450 dwellings and 2.5-3.5 hectares of employment land to the south east of Wigston and a smaller element of 350 dwellings within or adjoining Scraptoft, Thurnby and Bushby. This fits well with the spatial strategy for Oadby and Wigston by limiting development in the vicinity of Oadby from which there are less developed public transport links to Leicester and congested routes westwards through the Borough towards the M1. It also recognises the role that Wigston plays as a main town and Oadby as a district centre by identifying growth of an appropriate scale, and locating growth in suitable locations that would not compromise these roles and which would actually support the role of Oadby as a district centre. The Council also supports the resistance of proposals of a greater scale which could adversely affect the nature of the retail function of Oadby district centre.	
3575/118	Oadby and Wigston Borough Council	Para.6.36-6.40: This section should be amended to provide more and stronger references to the relationship between Harborough District and the Leicester Principal Urban Area, specifically that which immediately adjoins Harborough district, such as Oadby. References should relate to how this area functions in terms of retail hierarchy and highways and transport infrastructure and the role that the Leicester Principal Urban Area plays in terms of people travelling between places in Harborough district and Leicester City. Reference should be made to the Leicester Principal Urban Area Strategic Planning Context document which provides a large amount of the evidence base in this respect and which is maintained by all districts within the Leicester Principal Urban Area (including Harborough District Council, Leicester City Council and Leicestershire County Council). Paragraph 5.86 and 6.40 should be amended to reflect that as well as Leicester City, Oadby and Wigston Borough Council has also set out its commitment to retain Green Wedges in its adopted Core Strategy.	Provide greater clarity as set out in representation.
2029/133	Davidsons Group	<p>Housing Requirement</p> <p>Representations have been submitted in respect of Policy 2 which propose that for the Core Strategy to be sound, the time horizon of the Core Strategy should be extended to 2028 to take account of the requirement to plan for at least 15 years set out in PPS12 and that the housing requirement is increased accordingly (also including a 10% non-implementation rate for existing commitments). The submission also proposes that the amount of housing to be allocated to the Leicester Urban Fringe should not be any less than the proportion set out in the adopted RSS. The result is that the Core Strategy should be planning for approximately 485 dwellings in order to deliver 880 dwellings over the plan period 2006 – 2028.</p> <p>Areas of Separation</p> <p>Policy 15 is imprecise in its definition of a separation area and contains no criteria for how this could be monitored or the potential for review. In these respects the Core Strategy is considered to be unsound as it is neither effective nor justified.</p> <p>The Leicester Urban Fringe diagram on page 92 of the Core Strategy is unclear on where the separation area between Scraptoft and Thurnby/Bushby is located and does not assist in the understanding of the policy or provide clarity on the extent of its boundaries. This lack of clarity means that the policy is ineffective and it is difficult to see how it could be monitored or how the</p>	<p>The Core Strategy should be planning for approximately 485 dwellings in order to deliver 880 dwellings over the plan period 2006 – 2028 to ensure that it is justified, effective and consistent with national policy.</p> <p>The policy should provide for the review of separation area boundaries to ensure effectiveness of the policy in terms of deliverability and to justification in respect of being the most appropriate strategy. Reference should also be made to the proposals map to provide clarity to the policy. The last paragraph of the policy should be revised to read:</p> <p>“A separation area as shown on the Proposals Map will be maintained to the east of Station Lane and south of Covert Lane, Scraptoft to ensure the retention of identity of the Leicester Urban Fringe settlements and prevent coalescence between the villages of Scraptoft and Thurnby/Bushby. The boundaries of the separation area will be reviewed as part of the Allocations DPD.</p> <p>Support will be given for proposals, etc.....”</p>

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		<p>maintenance of the area of separation could be effected. This would lead to uncertainty for developers.</p> <p>Further detail on the separation area is provided by the Core Strategy proposals map for Scraftoft/Bushby/Thurnby. This is essentially the current Local Plan proposals map for the purposes of the area of separation. It is helpful to have the precise boundaries of the separation area defined and this proposals map should be cross referenced in the policy. However, given that that it is not the purpose of the Core Strategy to allocate housing sites it should also be made clear on the map that these boundaries will be reviewed as part of the allocation of development sites through the Allocations DPD.</p> <p>The Leicester Urban Fringe is dominated by Green Wedge and areas of separation. It is inevitable that accommodating further development in this broad location will require development to take place in currently protected areas. Indeed, this is implicit in the commissioning of an additional Landscape Character Assessment for the Leicester PUA which focuses its assessment on areas around the urban fringe and their capacity to accommodate development in landscape terms. Whilst this is recognised within Policy 15 in so far as it impacts upon Green Wedges (a detailed review of Green Wedge boundaries will take place through the Allocations DPD), no such principle is established in respect of the separation area, although such a review is equally required to ensure that the housing numbers are deliverable and the policy is flexible. The lack of such provision within the policy also renders the Core Strategy unsound because it is not the most appropriate strategy and is therefore not justified. The policy should be revised to include provision for review of the boundaries of the separation area.</p>	<p>The urban fringe diagram on page 92 of the Submission Core Strategy should be revised to more clearly show the location of both the separation area and the Green Wedge.</p>
3668/147	Mr N Renner	We support the allocation of additional housing in the Leicester Urban Fringe. It should be specified that proposals on the green wedge and area of separation allocations will not be supported. We would also support the increase of the housing allocation back to the level previously suggested, around 650 units, and support the continued requirements of affordable housing at the adopted SPD level of 30%.	Increase the housing allocation back to 650 units. Maintain affordable housing requirements at 30%. Specify that development within the green wedge or area of separation will not be supported.
2032/149	Thurnby & Bushby Parish Council	Allocation of 350 dwellings at Scraftoft/Thurnby/Bushby. While the Thurnby and Bushby Parish Council would have preferred this to be a lesser figure the Council would wish to see this as an absolute maximum.	The PC does have concerns regarding the distribution of 40% affordable housing within the allocation. In addition, the PC would wish to see development staggered/phased in order that infrastructure issues are in place to cater for the new developments.
2032/150	Thurnby & Bushby Parish Council	Leicester City services are already stretched and therefore not able to take any additional input from the Leicester Urban Fringe. The closest A&E provision will continue to be the LRI, which is located in a central position in the City. However, the impending reduction in services at the Leicester General Hospital will have a significant detrimental consequence for residents, who will now have to travel to either the LRI or Glenfield for treatment. For example, there will be a particular impact on those with cardiac problems, and may result in residents having to seek treatment outside the Leicestershire County. For example, there will be a particular impact on those with general medical problems, especially the acutely unwell and the sick elderly. People from the community will have to travel longer to seek in-patient care and so will their family and visitors. Access to comprehensive general practice services in the community is also limited.	Policy 15 should include a statement regarding ensuring that the Leicester City services have the capacity to meet the needs of additional housing in the Leicester Urban Fringe.
2032/151	Thurnby & Bushby Parish Council	Query the validity of the statements on the following grounds: - T & B is already subject to 'rat runs' from all directions and additional housing will make this worse.	

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		<ul style="list-style-type: none"> - A limited public bus service is only available during the daytime and does not provide transport in the evening. - Public transport operators are unwilling to provide additional services, despite consultations with the PC in the past. - Bus routes already do not meet the needs of all parts and/or residents of the Parish, with the result that residents have to walk long distances in order to use services. The additional needs of those living in new housing would make provision even more inadequate. - The Thurnby and Bushby Parish Council has had to step in to meet a particular need for the elderly and others who do not have their own means of transport by subsidising a 'Taxibus' service to shops and other amenities 	
2032/152	Thurnby & Bushby Parish Council	It is crucial that green wedges be retained and that boundaries are not altered. This is in line with Harborough Core Strategy Strategic Objective 5 and in harmony with the Leicester City Core Strategy.	
2032/153	Thurnby & Bushby Parish Council	The retention of the separation area is crucial for the communities of Scraptoft and Thurnby and Bushby. This is in line with Harborough Core Strategy Strategic Objective 5 and with the Leicester City Council Core Strategy. However, there is no clear indication of where the separation area is located and how this will be retained.	Need for clear identification of area of separation and commitment to existing defined boundaries remaining unchanged with a view to retaining the individual character of the village communities. The need to support defined communities and so encourage responsible attitudes within those communities is important for social welfare and cohesion.
2032/154	Thurnby & Bushby Parish Council	It is not clear which areas are covered by the 'High Leicestershire' designation in the Landscape Character Assessment and how large such developments will be. Any developments will have a detrimental impact on the attractive, rural character of High Leicestershire, of which Thurnby, Bushby and Scraptoft are part.	
3680/159	Mr M Rook	The Urban Fringe is under constant pressure to expand. Clearly the old villages that were once distant from the City Centre have been subsumed over time into an urban area. The requirement, very strongly held by residents of the area and made clear in the consultations at the time, is that the identities of the remaining fringe are as clearly defined as possible. This is of major interest to them. The figure of 350 dwellings is just about achievable on this basis, because it allows Green Wedges and Open Space to demark the areas. Whilst para 6.38 mentions a theoretical capacity of 1593 dwellings for the Fringe, these sorts of densities would not be possible AND maintain the Green Wedge policy (no 8) which has the support of the County Council as well as all the Districts of the County. So I believe the policy outlined in 15, is an excellent way forward, allowing development and separation and protection for the rurality of High Leicestershire. Finally, the transport pressures in the Fringe areas is recognised in LTP2, and LTP3 has little to add that can in anyway mitigate extra dwellings over and above 350.	
2034/177	De Montfort University	The final paragraph of Policy 15 looks to maintain a separation area to the east of Station Lane and south of Covert Lane, to ensure the retention of identity of the Leicester Urban Fringe settlements and prevent coalescence between the villages of Scraptoft and Thurnby/Bushby. RPS fully support the principle of maintaining the existing Areas of Separation around Scraptoft, Thurnby and Bushby which perform an important role in protecting the open character of land and preventing the coalescence of settlements. Development needs can be accommodated on land immediately adjoining the settlements, such as land to the north of Scraptoft Campus, without the need to develop on existing Areas of Separation. RPS consider the role of the Leicester urban fringe in the spatial strategy and its proportion of the District's housing distribution should be increased within the CS Publication Version in order to reflect the principles of the RSS and the evidence of potential capacity assessed in the SHLAA.	RPS would therefore recommend that the first paragraph of Policy 15 be reworded and reordered to read: "Significant development within and adjacent to the Leicester Urban Fringe settlements will be brought forward where it supports the regeneration and development objectives in neighbouring Leicester City and Oadby and Wigston Borough; is appropriate in scale and type in relation to existing communities; and safeguards the identity of the communities of Scraptoft, Thurnby and Bushby." The proposed rewording of this policy would reflect the RSS principles of concentrating significant development within or adjoining the PUA in order to support regeneration and development objectives in Leicester City and

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			<p>Oadby and Wigston. The location has also been identified within the CS Publication</p> <p>Version as being 'a suitable and sustainable location' and by the SHLAA as the settlement having the most capacity for development. Any increase in the level of housing development within the settlements of the Leicester urban fringe would also increase the level of affordable housing provision, given that the policy proposes a 40% affordable housing requirement in this area.</p>
3631/219	Dr K Feltham	The policy for the Leicester Urban Fringe is supported.	
3640/224	CASCET - Campaign Against the Stoughton Co-op Expansion Threat	This provision of 350 dwellings in the Leicester Urban Fringe (defined as Scraftoft, Thurnby and Bushby) is the maximum that can be accommodated without exceeding the capacity of the traffic junction with the A47 - an already heavily congested commuter route into Leicester.	
2044/249	Barratt Strategic	<p>As indicated in the representation in respect of policy 1, it is considered that the area to the south of Leicester, adjacent to the edge of Oadby, which includes Springhill Farm on the north east side of the A6 is suitable for development as outlined in the promotional document which has been prepared to accompany this representation. The area is considered to be part of the PUA as defined in the East Midlands Regional Plan where sustainable developments of up to 880 dwellings (40 dwellings per annum) are envisaged by policy Three Cities SRS 3.</p> <p>As indicated in the representation in respect of policy 2, it is considered that the provision figure of 350 is significantly under what could be reasonably achieved in the PUA without detriment to the character of the individual settlements and the District as a whole. The PUA is considered to be more suitable for development given the well developed public transport links to the established and extensive services and facilities contained within the city of Leicester. The previous version of the Core Strategy document referred to approximately 1100 dwellings being provided within or adjoining the PUA and this is considered realistic given that up to 600 dwellings could be accommodated on the Springhill Farm site, as indicated on the master plan contained within the submitted promotional document.</p>	<p>It is considered that the provision for the Leicester Urban Fringe should be increased from 350 to 1100 as advocated in the October 2009 version of the Core Strategy and reduce the number proposed for Market Harborough from 1200 to 450 dwellings.</p> <p>The settlements of Oadby and Great Glen should be added to the text contained within policy 15. This would more closely reflect the definition of the Principal Urban Area contained within the East Midlands Regional Plan where Oadby is included together with the other three settlements referred to in Policy 15.</p> <p>Alternatively, Policy 15 could be revised to make reference to the Leicester Principal Urban Area, the term used in the Regional Plan, as opposed to the Leicester Urban Fringe.</p>
3602/267	Ms C Renner	It is agreed that the Leicester Urban Fringe (LUF) has good transport links and has good access to key services. However, we feel that there should be more than 350 dwelling provided in the LUF, reflecting its sustainable location. As previously stated, we welcome the retention of the existing Green Wedges and Areas of Separation.	
2018/77	Thurnby and Bushby Society	<p>Description of Thurnby, Bushby and Scraftoft in Paragraphs 6.31 and 6.39: Explanation fails to bring out the adverse topography.</p> <p>The topography inhibits travel by a variety of modes of transport, contrary to Policy 11c(viii) and contrary to Harborough Sustainable Community Strategic Vision paragraphs 5 and 6, and contrary to Harborough Core Strategy Strategic Objective 3.</p>	Expand paragraphs 6.31 and 6.39 to say that existing development is spread out in a linear manner (both North-South and East-West) over considerable distances with steep hills approaching settlements. In addition the A47 and dismantled railway line partitions the built area. This means that Thurnby & Bushby and Scraftoft cannot be regarded as one unit for services and facilities unless a car is available. Walking (or even cycling) is not an easy option, especially if heavy shopping is involved.
2018/78	Thurnby and Bushby Society	At least 40% or 140 affordable housing: There is a need for more affordable housing to assist people with their housing needs, provided their design is in keeping with the character of the area.	For clarity, add to Policy 15 "Their design should be in keeping with the character of the area".

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3657/416	Jelson	<p>The Leicester Urban Fringe is an area that the core strategy recognises as highly sustainable. Development in this area also helps to meet one of the key objectives of the Regional Plan, which is urban concentration. It follows that development in this area ought to be a desirable objective and represents an opportunity for sustainable development that should be maximised. Indeed the Council's SHLAA identifies the potential for 1593 new dwellings to be delivered in this area. Given this it is not considered appropriate for the core strategy to seek to artificially constrain development in this area to 350. This cannot represent a sustainable development strategy.</p> <p>In addition, in light of our concerns about the lack of flexibility of the core strategy as a whole it is considered that additional development in this area (where there appears to be capacity) is an obvious and sustainable approach. To this end the strategy should be amended either to increase the target in this area, or to express the 350 as a minimum with additional development to be permitted subject to assessment against transportation and environmental constraints. In respect of the latter, Policy 15 refers to the retention of an Area of Separation to the east of Station Lane and south of Covert Lane. Jelson objects very strongly to this Area of Separation as it very clearly does not perform that function. It is evident that the settlements of Scaptoft and Thurnby are already coalesced, both with themselves and with the Leicester urban area. The attached plan clearly highlights this. By any sensible definition this area does not perform any function in separating settlements and is therefore entirely mis-designated.</p> <p>There may be some benefit in seeking to protect the character of the historic core of Scaptoft and the open character of the area around the junction of Station Lane and Covert Lane. Such a function is, however, one more appropriately dealt with through a green wedge designation and through a very substantially reduced area. The current area of separation (which is proposed for retention in its entirety) is very substantially larger than is required to achieve this objective. Its only function is to prevent perfectly acceptable development in one of the areas that the core strategy itself recognises as one of the most sustainable in the District. The Council's own landscape character assessment supports development in this general area. Jelson consider it essential that the role, function and extent of this Area of Separation is reviewed as part of the core strategy and is not left to any future DPD. This is because the future of this area is a major determinant of the capacity of the Leicester urban fringe and therefore the overall distribution strategy for the District. If this designation is not to be reviewed as an integral part of the core strategy then this again supports the suggestion that the development target for this area should be expressed as a minimum, accompanied by a clear indication that further development will be dependant on the review of the role and function of the Area of Separation. At present the distribution strategy is being unduly influenced by the Council's desire to cling onto an historic designation that stagnates large areas of sustainable development land but which has never been the subject of any formal review.</p>	
2065/429	Trustees of the Bushby Settlement c/o Mather Jamie	Representations have been submitted in respect of Policy 2 which propose that for the Core Strategy to be sound, the time horizon of the Core Strategy should be extended to 2028 to take account of the requirement to plan for at least 15 years set out in PPS12 and that the housing requirement is increased accordingly (also including a 10% non-implementation rate for existing commitments). The submission also proposes that the amount of housing to be allocated to the Leicester Urban Fringe should not be any less than the proportion set out in the adopted RSS. The result is that the Core Strategy should be planning for approximately 485 dwellings in order to deliver 880 dwellings over the plan period 2006 – 2028.	The Core Strategy should be planning for approximately 485 dwellings in order to deliver 880 dwellings over the plan period 2006 – 2028 to ensure that it is justified, effective and consistent with national policy.
2065/430	Trustees of the Bushby Settlement c/o Mather Jamie	The last sentence of paragraph 6.37 states that the 2009 PUA Landscape Study identifies several areas of land adjoining existing development at the A47 and Thurnby and Scaptoft, as having a	To ensure that the Core Strategy is sound, references to the PUA landscape strategy's rating of areas of land within the urban fringe should be

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		<p>'medium-high' capacity. This comment is made in the context of the Leicester urban fringe area having limited capacity to accept major developments. Reference is also made in paragraph 6.38 to the draft SHLAA update 2010 and again refers to the capacity for the area being taken from those sites with a rating of medium or above. It is our view that these paragraphs suggest that only these sites will be suitable for residential development and prejudices the outcome of the Allocations DPD. This is of concern as we are not satisfied that such a suggestion is founded on a robust and credible evidence base, and consequently the Core Strategy is not sound.</p> <p>Trustees of the Bushby Land Settlement have land interests to the south of the A47 Uppingham Road in Bushby. Whilst the extent of the landownership covers a wide area, it is only proposed that approximately 4.4ha of land lying immediately to the east and south of existing Uppingham Road properties is presently suitable for development. The Trustees have instructed Pegasus Environmental to carry out an independent assessment of Harborough District Council's landscape work for the PUA which rates parcel 20 (of which the 4.4ha forms part) as having low capacity for development.</p> <p>The assessment notes that a clear discrepancy of the PUA landscape study is the ability of land parcels more remote from the existing settlement to have a higher capacity to accommodate development. The character assessment that precedes the capacity study tells us that settlement local to this area is commonly associated with ridges and hilltops, as Bushby is. It would be out of character to see development positioned within lower lying valley locations</p> <p>The independent analysis finds that consideration of the 4.4ha site on its own merits against the criteria set out in the PUA landscape capacity assessment leads to a different conclusion on capacity. The assessment of the site on its own generates a score of 30 points elevating the site into the band of medium to high capacity to accommodate development.</p> <p>In light of the above, it is our view that comments based on the PUA landscape study regarding the rating of sites and their capacity for development are not based on a robust and credible evidence base and thus that the Core Strategy is unsound.</p>	<p>accompanied by additional text that makes clear that the allocation of sites in the Leicester urban fringe will be made through a separate DPD which will assess the suitability of each site on its own merits.</p>
2073/450	Leicester Diocesan Board of Finance/Carr/Bowie/Murmann/John	<p>Affordable housing remains one of the most contentious areas of delivery as part of the objective of providing homes for all. Para 5.24 recognises this as a major problem with the affordable housing need deemed to be 75% of the total annual housing requirement. Of the intended Strategic Housing allocations in Policy 2, only 350 are identified on the Leicester Urban Fringe for the eastern half of the District. Notwithstanding the percentage requirements, this represents a disproportionately and significantly lower provision for half of the District, where it is recognised that overall house prices are higher, and affordability more difficult.</p> <p>This imbalance has serious economic and social consequences and undermines the Strategic Objectives of the Core Strategy. Great Glen is the only and best placed settlement where a further strategic allocation can help significantly redress this imbalance, not just for affordable housing, but also with jobs, and supporting and ~ facilities. By recognising the importance of Great Glen and its location, the affordable housing provision could effectively be doubled for the Rural North and Central Housing Viability Sub-Market Areas. With a higher requirement of 40% affordable housing provision in this Sub-Market area, it makes sense to ensure delivery and achievement of objectives by making strategic housing allocations in this area.</p>	<p>The Policy should be amended to illustrate the provision of Affordable Housing by Sub-Market Areas. This will demonstrate the ineffectiveness of the current Strategy for delivering new housing; and should be redressed by recognising a strategic allocation at Great Glen.</p>
2065/547	Trustees of the Bushby Settlement c/o Mather Jamie	<p>Representations have been made in respect of Policy 3 Affordable Housing of the Core Strategy. In particular that policy was considered to be unsound because it is not effective in respect of it</p>	<p>Sentence 2 of Paragraph 2 of Policy 15 should be amended as below to ensure that it is sufficiently flexible to deal with changing circumstances</p>

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		being deliverable and flexible. The same comments apply to the affordable housing requirements in Policy 15. The policy should be reworded to take account of the potential changing circumstances, particularly in respect of infrastructure requirements which could impact upon site viability and the ability of a development to meet affordable housing targets. This would ensure that the Core Strategy meets the tests of soundness.	and can meet the test of effectiveness. “Of this development, a target of 40% or 140 dwellings will be negotiated to be affordable housing, taking into account site viability, and will be provided in a mix of social rent and intermediate tenures to meet the housing needs of the area.”
2065/548	Trustees of the Bushby Settlement c/o Mather Jamie	<p>The Leicester Urban Fringe is partly characterised by designated Green Wedge. It is inevitable that accommodating further development in this broad location will require development to take place in currently protected areas. Indeed, this is implicit in the commissioning of an additional Landscape Character Assessment for the Leicester PUA which focuses its assessment on areas around the urban fringe and their capacity to accommodate development in landscape terms. It is recognised within Policy 15 that a detailed review of Green Wedge boundaries will take place through the Allocations DPD and the inclusion of this principle within the policy is supported. The review is essential to ensure that the housing numbers are deliverable and the policy is flexible.</p> <p>The proposed detailed review of Green Wedge boundaries in the Leicester urban fringe through the Allocations DPD is therefore supported and is considered to be sound.</p>	
2065/549	Trustees of the Bushby Settlement c/o Mather Jamie	The last sentence of paragraph 6.40 states that residential development will be discouraged in Green Wedges and areas of separation. This prejudices the outcomes of the review of the Green Wedge as part of the Allocations DPD.	<p>The last sentence of paragraph 6.40 should be revised to read</p> <p>“Specific support will be given for implementing Green Infrastructure initiatives as described in policy 8”.</p>
2085/571	Natural England	<p>Natural England supports the priority that the policy wording gives to the protection of green assets, including the Green Wedges, and the valuable multi-functional resource that these will provide for biodiversity, recreational provision and for providing cycle and walking routes.</p> <p>We also support paragraph 6.37 that full consideration has been given to the District Landscape Character Assessment (2007) and how the use of this document has helped in selecting suitable locations for development.</p>	
2016/58	Scraptoft Parish Council	The Scraptoft Parish Councillors would it put on record that they are in agreement and support the content of Policy 15: Leicester Urban Fringe as set out in the Harborough District Core Strategy Publication Version.	
2018/64	Thurnby and Bushby Society	<p>The access to the facilities in the built-up area of Leicester from the Leicester Urban Fringe requires a car because the buses from here go only to the eastern side of the City Centre. There is no direct bus access to local shopping areas, hospitals, schools, universities, railway station or even the Highcross shopping complex.</p> <p>So there is no transport choice. The ‘easy access to key services and facilities’ referred to in paragraph 6.30 (page 91) is only possible by car. Thurnby & Bushby Parish Council has been obliged to subsidise a ‘TaxiBus’ to enable non-car drivers to get to the shops.</p> <p>This is contrary to Harborough Sustainable Community Strategic Vision paragraphs 5 and 6, and contrary to Harborough Core Strategy Strategic Objectives 3 and 9</p>	Add a sentence to Policy 15 to say that release of housing land in Leicester Urban Fringe shall take account of the availability of direct public transport to services and facilities
2018/65	Thurnby and Bushby Society	Leicester City Services and facilities (e.g. GPs, dentists, libraries) are stretched without the added load of extra urban fringe demand.	Add a sentence to Policy 15 to say that release of housing land in Leicester Urban Fringe shall take account of the capacity of the services and facilities

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			available in Leicester City
2018/66	Thurnby and Bushby Society	Para.6.30: The transport links are radial (down the A47). It is the circumferential links that are poor, due to the lack of a proper outer ring road here. (Was this a typo?)	In paragraph 6.30 replace the word 'radial' with the word 'circumferential'
2018/68	Thurnby and Bushby Society	Development should not all be in one place. E.g. if all 350 dwellings feed onto Station Lane, Scraftoft /Station Road, Thurnby, sites add too much traffic to roads already congested. This is contrary to Harborough Core Strategy Strategic Objective 9	Add a sentence to Policy 15 to say that the locations of development in Leicester Urban Fringe should seek to avoid focussing traffic onto the same roads
2018/69	Thurnby and Bushby Society	Local constraints limit the number of houses. We consider that 350 is the absolute maximum number as this area does not have the local facilities and services to cope with more. It represents a 16½ % increase on current numbers. This is a larger increase than those for the other parts of Harborough District, which we believe to be no more than 12½ %. We would have preferred a lower number but realise the constraints on the Planners.	
2018/70	Thurnby and Bushby Society	Retain Green Wedges; It is in line with Harborough Core Strategy Strategic Objective 5 Subject to boundaries not being altered significantly.	
2018/71	Thurnby and Bushby Society	Retain Separation Area to prevent coalescence between the villages of the Scraftoft and Thurnby/Bushby. It is in line with Harborough Core Strategy Strategic Objective 5 Subject to boundary not being altered significantly. If development for leisure is a possible future use, then the area needs to be large enough for people and wildlife.	

Policy 16 Representations

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2002/3	Ms A Read	I wish to air my views that I am not happy or accepting of the strategy for broughton astley for the CSS under policy 16. The part I completly am not accepting of is the gypsy and traveller dwellings, this is not in keeping with safeguard of the individual character of the district. I wish my views to be put forward to the government inspector for review before the final decision is being made.	
3276/15	Mr S White		The lack of sports facilities in Broughton Astley is holding the village back. The junior football sides are restricted to playing at the local school and in the Winter train in either Lutterworth, Enderby or Wigston. A village the size of BA should have its own sporting facilities especially for the evening/winter.
2020/87	Cllrs Golding, Dann and Liquorish	Moving forwards towards the designation of 'Key Settlement' would appear to offer little reward to the majority of existing residents, as it is hard to believe that the construction of 300 houses over the next 15 years will address the current shortfall of amenities, let alone any increased demands from residents.	Some form of external finance must be found to meet the current shortfall in facilities before any consideration should be given to increasing the number of homes serviced by the existing woefully lacking amenities for a population of around 11,000 residents (and growing!). What is required, and is highlighted in the report from Tym and Partners, is the construction of additional sports and leisure facilities, but in order to do this land needs to be allocated for such a development.
3682/162	Dunton Bassett Parish Council	Policy 16 – 6.48 Broughton Astley 500 houses ‘unlikely to cause the operation of any junction to fail’. Dunton Bassett Parish Council strongly disagrees with the above comment, in relation to the junction where roads B581 and A426 meet. It is felt that this cross-road is already used to full capacity and that such level of additional housing, in which residents would use this route to gain access to both Leicester City Centre and M1 motorway would create serious traffic congestion.	Policy 16 – 6.48 Broughton Astley 500 houses ‘unlikely to cause the operation of any junction to fail’. Dunton Bassett Parish Council strongly disagrees with the above comment, in relation to the junction where roads B581 and A426 meet. It is felt that this cross-road is already used to full capacity and that such level of additional housing, in which residents would use this route to gain access to both Leicester City Centre and M1 motorway would create serious traffic congestion.
3665/170	Mr & Mrs Crane	This policy favours development within the development limits of Broughton Astley, however, this is not deliverable as the SHLAA only identified land for 5 dwellings within the development limits. This element of the policy is therefore not sound since it is not effective or deliverable. There is acknowledgement throughout the document (at paragraphs 2.8, 2.26, 2.36, 5.65, 6.43, 6.44, 6.50, 6.51, 6.52 and 6.53) that the provision of services, facilities, employment opportunities and retail floorspace has not kept pace with the development of housing in Broughton Astley. For this reason this policy aims to be supportive of development which seeks to redress this balance. However, we do not feel that this is expressed strongly enough in the wording of the policy or the housing allocation. Broughton Astley has been given the same status as Lutterworth as a “Key Centre” therefore the housing allocation should be the same with each settlement receiving 500 dwellings. In order for the vision for Broughton Astley to be deliverable it must allow for sufficient development to allow the provision of new services. A larger proportion of the District’s housing would allow for greater contributions towards the infrastructure Broughton Astley is so lacking. Lutterworth is not in such great need so therefore should not have the higher allocation. Without allowing for sufficient development to address the needs of Broughton Astley this policy is not effective at delivering its aims. Whilst Policy 16 opens stating that “Broughton Astley will develop its role as a key centre to the local population, offering an improved range of services, facilities, shops and employment opportunities” there is little within the policy to support the development of new services etc. Part a) of the policy states that new housing will be developed where it is accessible to “existing shops and services” but it must be recognised that additional services are required. Part f) refers to the local infrastructure	Part a) i) Remove the word “limited” in reference to Greenfield development. The SHLAA identifies land for only 5 dwellings on Previously Developed Land but 1,420 on Greenfield. It is therefore not realistic or deliverable to either prioritise PDL or limit Greenfield development. This change would make this element of the policy sound since it will be effective and deliverable. Part a) i) Remove the word “existing” in relation to access to services. This is in conflict with the desire to improve services. This does not have regard to the ‘reasonable alternative’ of providing new services, particularly in south western end of village which is remote from the existing shopping and business area. This part of the policy also conflicts with part c) of the policy and paragraph 6.53 which states that there is “very limited opportunity for further development within or immediately adjoining the currently defined Principal Shopping and Business Area” and acknowledges that “development may therefore require considerations of locations outside the Principal Shopping and Business Area”. Part b) “improving links within existing built up area” should read links “within and to” to allow for the provision of development outside the existing built up area since this is what is deliverable. This change would make this element of the policy sound as it is not effective as currently drafted. Part c) should not seek to simply “enhance” retail and service provision since this presupposes support for existing services only. This

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		requirements which appendix 2 demonstrates are severely lacking in Broughton Astley.	policy should be more explicit that proposals for new services will be supported.
2040/231	Westleigh Developments Ltd	<p>The desire to enhance the retail and service provision within the village and the willingness to accept developments outside the existing Principal Shopping and Business Area (PSBA) where they are easily accessible to residents in the village and the catchment is supported. Additional retail development in the village would enable it to clawback expenditure from Broughton Astley (and surrounding villages) that currently goes to nearby towns and out of town facilities, which contain supermarkets. This would add to the sustainability of the villages in accordance with the principles set out in the draft Core Strategy. The development of the land at Coventry Road, which is less than 800 metres from the village centre but also accessible from the B4114 without the need for delivery vehicles to pass through the centre of the village, provides the ideal opportunity to meet the retail and service needs of the village in the future. Paragraph 6.53 recognises that there is very limited opportunity for further development within or immediately adjoining the currently defined PSBA and additional developments for sport, leisure and retail uses may require consideration of sites outside of this area, provided they would have good accessibility by non-car modes.</p> <p>The preference for Broughton Astley, as a Key Centre, for additional employment provision when existing employment sites are reviewed and new sites allocated is also supported.</p> <p>The aim of providing a separation area between Broughton Astley and Sutton-in-the-Elms is supported provided its extent is limited to greenfield land immediately adjacent to Sutton. The extent of the area should be determined by the Allocations DPD following further consultation with the relevant land owners and stakeholders.</p>	Amend the reference to the provision of a separation area between Broughton Astley and Sutton-in-the-Elms to state that it is should be a limited area containing greenfield land only immediately adjacent to Sutton. Reference should also be made to the fact that the extent of the area should be determined by the Allocations DPD following further consultation with the relevant land owners and stakeholders.
2041/237	Barratt Strategic	<p>As indicated in my previous representation, the number of new dwellings identified for Broughton Astley(300) is significantly lower than that apportioned to Lutterworth (500). The provision of new employment, retail, leisure and commercial developments is important to the continued social and economic well-being of the village. It is considered that a provision of 500 dwellings, the same figure as Lutterworth is justified by their equal ranking in the settlement hierarchy. Furthermore, the Ove Arup and Partners highways assessment indicates that the provision of up to 500 new dwellings (and 6.75 hectares of employment land) could be supported without detriment to the village. The provision of 500 additional dwellings in the village would give rise to significant financial contributions which could address the imbalance between houses and facilities within the village.</p> <p>The requirement for a priority order which gives preference to sites within the existing limits to the village ignores the evidence provided in the SHLAA that land for only 5 houses has been identified in the assessment. As paragraph 6.49 of the Core Strategy advises, although land for up to 1420 dwellings has been identified in the SHLAA at Broughton Astley, all of this would be on greenfield sites.</p>	Amend the reference to 300 dwellings to 500 with a corresponding increase in affordable housing from 90 to 150 (30%). Remove the reference to the priority order for development.
2050/307	William Davis Ltd	<p>William Davis Ltd support Policy 16 and the identification of Broughton Astley as a Key Centre for the district. We support the council's recognition in paragraph 6.47 of the settlement's current range of services and facilities which we consider help make Broughton Astley a sustainable location for residential development in line with national planning policy.</p> <p>William Davis also believe that the 2010 SHLAA update helps to demonstrate that the 300 dwellings allocated to Broughton Astley in Policy 2 and Policy 16 is deliverable. The SHLAA indicates a potential housing capacity of over 1,400 dwellings in the settlement and helps to justify the allocation and demonstrate that the policy is both deliverable and effective.</p>	William Davis do not consider that any changes are needed to Policy 16 and support the allocation of Broughton Astley as a Key Centre in the Core Strategy.

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		William Davis also support the council's recognition in Policy 16 that the limited development of Greenfield Land in Broughton Astley will be necessary.	
2054/320	Wheatcroft & Son	<p>We do not consider that the village of Broughton Astley should be designated as a Key Centre within the Core Strategy.</p> <p>Broughton Astley has a similar level of services and facilities as the other Rural Centres, whereas, Lutterworth is considerably larger than any of the Rural Centres and consequently offers more variety of services and facilities. The Sustainability Appraisal, which accompanies this Core Strategy, in several places outlines the similarity between Broughton Astley and the other Rural Centres. At section 1.3 paragraph 2 It states that Harborough District has two main commercial centres Market Harborough and Lutterworth and several smaller settlements including Broughton Astley, Fleckney Great Glen etc. The document clearly groups Broughton Astley with the other Rural Centres and not with the higher tier settlements. Within the "Potential positive sustainability effects of the Core Strategy" table it outlines that policies will improve transport links in smaller settlements including Broughton Astley. Both of these points clearly show that the Sustainability Appraisal consider Broughton Astley to be a much smaller settlement than Lutterworth. Therefore we consider that only Lutterworth is worthy of its enhanced status within the settlement hierarchy and that there is no justification for designating Broughton Astley as a Key Centre.</p> <p>We are concerned that if Broughton Astley is given the same status as Lutterworth that this would lead to a concentration of development in that settlement instead of spreading growth across the Rural Centres. This could damage the viability and sustainability of the Rural Centres leading to a decrease in the number of facilities and services available locally.</p>	Broughton Astley should be re-designated as a Rural Centre in keeping with the level of services and facilities it provides. Lutterworth should be the only Key Centre in the District. Policy 16 should be deleted and Broughton Astley included within Policy 17.
2055/368	Leicestershire County Council	Effective: The Policy is not strong enough to drive the changes in employment and other facilities necessary to make Broughton Astley less of a large dormitory housing estate, and therefore a suitable location for the scale of housing growth envisaged. This has a bearing on the suitability of Broughton Astley as a place for further significant housing development.	Strengthen the Policy to justify the Key Centre designation by allowing for an expansion of the business and shopping area.
3678/380	Mr N Lane	As stated in response to Policies 1 and 2, the provision of an additional 300 dwellings at Broughton Astley to develop its role as a Key Service Centre to the local population is supported. The recognition that some greenfield land will be required to deliver the additional housing growth, as set out in Policy 16, is supported. Sustainable greenfield sites, with safe and easy pedestrian and cycle access to existing shops and services in Broughton Astley, such as land at Glebe Farm, should be allocated for residential development. The development of greenfield sites could also deliver additional employment land, providing employment opportunities for the local population. New community facilities to serve existing and new residents could also be provided as part of a greenfield development. Concern is however raised over the credibility of the evidence upon which the supporting text of the policy is based; this includes the Harborough District Landscape Character Assessment and the Strategic Housing Land Availability Assessment. The soundness of the policy is therefore questioned; the concerns pertaining to the credibility of the evidence are set out below. Paragraph 6.49 refers to the Harborough District Landscape Character Assessment, which considered Broughton Astley "capable of accommodating development around its edges where topography allows the new development to connect with the existing settlement edge without exposure to open views or impact on the wider Upper Soar character area". It is considered that the assessment has failed to consider the sites on an equal basis. The Glebe Farm site (site H) is identified as land unsuitable for development in landscape terms, whilst adjacent land to the east (site G) is considered to have potential for development in landscape terms. Both sites are within the same landscape setting and are well	Set out in response to point 5.

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		related to the settlement edge, with Glebe Farm being better related to the main built up area of Broughton Astley than the adjacent site. The 2009 version of the Strategic Housing Land Availability Assessment (SHLAA) identified the site at Glebe Farm, Broughton Astley as a site suitable for development, being both deliverable and developable. However, the 2010 SHLAA identifies the site as a site “not currently developable for housing”. It is not clear why there has been a change in the way in which the site has been considered between 2009 and 2010 SHLAA; justification for the change has not been provided. In terms of the site nothing has changed in respect of its potential constraints, it is therefore considered that the previous assessment of the site, as contained in the 2009 SHLAA should remain.	
3657/417	Jelson	Jelson supports the Policy approach for Broughton Astley. Additional housing and employment development will help to ensure the sustainability of the settlement.	
2081/535	Bitteswell Parish Council	The paragraphs on page 96 summarise the development history of the village of Broughton Astley. With regard to Policy 16, perhaps the primary observation to be made is that, through several decades the near annihilation of the village of Broughton Astley as the result of untrammelled development is an episode which has permanently harmed the reputation of the District Council; it must rank highly among the poorest examples of rural development. Page 97 announces the intention of building another 300 dwellings at Broughton Astley. Fulfilment of this intention will only serve to compound the difficulties for Broughton Astley and not improve the reputation of the District Council.	
2014/54	Mr J Marlow	<p>Para.6.51-6.55: Whilst supporting the broad strategy, as published, for affordable housing, I consider that the District Council should take steps to ensure that all new housing complies with minimum space standards.</p> <p>Within Policy 16 there are several ritualistic references to Affordable Housing. My fear is that all too often there is a great difference between AFFORDABILITY and ACCEPTABILITY. Too much lip service is paid to the creation of Affordable housing when so much of it is of a low standard. Indeed, much of the recent speculative housing in locations such as Lutterworth and Broughton Astley have been sub-standard in terms of space provision and simple measures to satisfy Energy Conservation requirements. This is a wide and very important subject. I touched upon it in a recent letter to an officer of Harborough District Council and a copy is attached as Appendix A.</p>	I support the policies directed towards the provision of Affordable housing throughout the District but, in the light of the existence of sub-standard dwellings in terms of space standards, I consider that the District Council should adopt minimum space standards for ALL new dwellings and see that those standards are enforced.
2014/55	Mr J Marlow	<p>Sadly, it is possible to sum up the contents of pages 96-100 by saying it is a bland recitation of the 'status quo', where no action is likely or intended within the 16 year period between 2010 and 2026. Certainly there is no evidence to indicate that any attention will be given to a full and in-depth study of Broughton Astley where a careful strategy could be devised to restore some form of order and purpose to the random and fragmentary situation that now prevails.</p> <p>At the very least, it should be possible to restore some kind of order to the mess that exists in Main Street, Primethorpe. The traffic pattern is poor, car parking and vehicular movement is badly regulated and acts as a stranglehold over the effective promotion of this area that was designated as the major shopping centre of 1969.</p> <p>There is some potential for further development activity at Devitt Way, but the major defect is a complete lack of attention to the prospects for greater community cohesion through a careful analysis of the site potential in the general area lying to the north and south of Cosby Rd where it is bisected by the north to south route of Broughton Way.</p>	<p>The content of Policy 16 is far too vague and lacks any positive statements to establish and sustain Broughton Astley as a Key Centre.</p> <p>Firstly, the Core Strategy fails to establish those functions that justify the designation of a settlement as a Key Centre. Secondly, if Broughton Astley is deemed to satisfy sufficient criteria for such a designation, then it follows (when viewed in the context of a fellow Key Centre such as Lutterworth) that it is necessary to acknowledge the lack of certain other facilities or activities and make sure that their establishment and provision is urgently addressed. These would include adequate leisure facilities, an effective and central retail and commercial area supported by the early improvement in the pattern and frequency of public transport.</p> <p>Policy 16 merely establishes Broughton Astley as a Key Centre without taking any steps to improve on or correct known deficiencies that undermine the long term prospects of a vibrant Key Centre.</p>

Policy 17 Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2025/108	Great Glen Parish Council	Concern that decision has already been made to designate Great Glen as a Rural Centre and it will be the focus for additional development to serve its rural catchment areas. Question: What employment is deemed suitable for Great Glen? What is deemed rural affordable housing? How much is too much? How will the targets be monitored? How much say will the Parish Council have in what is allocated to its Parish?	
3499/14	Houghton On The Hill Parish Council	Houghton on the Hill is not a dying community! Therefore an injection of new development, to support village businesses and/or organisations, is not needed. Also, further opportunities for employment do not exist. Houghton on the Hill Parish Council considers that additional housing should be concentrated in areas where infrastructure and facilities exist to make this housing sustainable. This is considered to be of crucial relevance as transport infrastructure would be in place already and also employment opportunities would be available in the PUA and the SRC's, therefore mitigating the need for additional road and transport expansion. Local radial transport network and transport network within the village are already inadequate for existing use. No provision for public parking exists within the village. Traffic congestion on Main Street is a daily occurrence. This situation would be grossly exacerbated by the introduction of any additional housing development. Houghton Parish Council points out that existing local transport, education, health, and water and sewage infrastructures are already at full capacity. Therefore, Houghton on the Hill could not sustain the additional demands of a new housing development. Houghton Parish Council considers that existing village boundaries and limits to development should be maintained. Houghton on the Hill Parish Council strongly objects to the inclusion of Houghton on the Hill in the current list of "Selected Rural Villages" as identified in Policy17, paragraph 6.63.	For supporting reasons submitted in response to Question 5, Houghton on the Hill Parish Council strongly advises that Houghton on the Hill be removed from the current list of "Selected Rural Villages" as identified in Policy17, paragraph 6.63.
3438/23	Cllr M Rook	Para 6.57 states that 30% of the population lives in settlements of less than 500 people. Para 2.2 emphasises early on in the strategy, the rurality of the District. This is central UK at its rural best, and the hinterland of high Leicestershire serviced by its important Market Towns and Rural Centres. The rural character of the area is defined by its village communities and it is an essential tenet of the Core Strategy that these villages be allowed to grow in a controlled manner. Policy 17 outlines and demonstrates how this can best be achieved by planning permissions to retain the viability of Shops, Pubs, Village Groups and very local Health provision. The law of unintended consequences surrounding an "anti-car" policy for rural area development in the past now needs to be re-addressed to reconstruct a healthy economy and thriving village life over the span of the Core Strategy.	
2021/95	East Midlands Housing Group		<p>We think that there needs to be a balance between housing to be provided in the rural centres e.g. Kibworth, Fleckney etc and other smaller rural settlements where a need has been identified.</p> <p>Traditionally we would expect a Housing Needs Survey in rural villages to identify affordable housing needs and ideally to identify an exception sites to support the delivery of the housing. How would this work in the context of the proposals set out in the Core Strategy and will there be an Exceptions Site policy to support this approach? There is no reference to delivery of affordable housing in small rural villages and exception site policy to support this approach.</p>

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2026/121	Compass Group	Policy 17 states an intention to strictly control the development of land outside Rural Centres and Selected Rural Villages. This intention is not supported by any regulation anywhere within the document. This policy was previously controlled by Policy EV/4 which is now listed in Appendix 3 as being replaced by Policy 17. Policy EV/4 is referenced on the Proposals Map as a control for the development of attractive countryside but the map will not be issued until 2012. Further the status or relevance of the map reference to Policy EV/4 is not stated. Therefore Policy 17 has no means of controlling the development of land Outside Rural Centres and Selected Rural Villages and is ineffective in this regard.	Implement and reference within this document a policy to regulate the development of attractive countryside for at least the interim period 2011 to 2012. Clearly reference or include the Proposals Map that defines the Areas of attractive countryside.
3670/148	Mr P Johnson	Policy 17 notes that new housing development will only be permitted in selected rural villages where it meets an identified rural need. Section a) also notes that only villages with identified Limits to Development may receive limited small scale infill development. This means that in smaller villages there will be no opportunity for either organic open market or affordable housing to meet local need. Whilst this may be seen as being sustainable, the reality is that this simply forces up rural house prices and sets villages in stone. Rural workers who cannot justify a tied agricultural dwelling for various reasons therefore are excluded from access to housing near the land on which they work and cannot afford to live in rural settlements close to (i.e sustainably located near) their place of work. The lack of organic growth means the settlements become middle-class dormitory villages. The policy is not justified as it actually acts as a barrier to housing provision and those in genuine need in the rural area - in particular the smaller villages.	The policy should be amended to allow infill development for all housing types in all villages. Affordable/Local needs housing should be allowed wherever there is a local need, not just in larger villages. Villages must be allowed to grow organically as they have always done, not set in stone.
3665/171	Mr & Mrs Crane	The policy, particularly in regard to employment in rural areas, is too restrictive. The Core Strategy limits development other than for the purposes of agriculture, woodland management, sport and recreation, local food initiatives, support visits to the District and renewable energy production. This is not in accordance with PPS4 which seeks to encourage development of new employment locations both in urban and rural areas. The previous Core Strategy consultation was undertaken under the provisions of PPS7 but since this time, the employment elements of this have been deleted and employment is dealt with in a single PPS4. This has had the effect of removing the distinction between approaches to employment in rural and urban areas and ensuring that they are now treated equally. Through having a different policy approach to rural areas and Market Harborough the Core strategy is not in accordance with National Policy. Part d) also restricts re-use of rural buildings far in excess of the restrictions held within National Policy. PPS4 simply states that it supports "the conversion and re-use of appropriately located and suitably constructed existing buildings in the countryside" with no requirement for them to be worthy of retention. There is also no national requirement for new employment to be linked to the retention of rural services, land based business or agricultural diversification. The commitment to maintain and enhance local services plus development of new services, however, is welcomed.	Part d) should be rewritten to reflect PPS4 which supports employment development on the edge of existing settlements where employment, housing (including affordable housing), services and other facilities can be provided close together, the conversion of rural buildings, replacement buildings in the countryside, as well as retention of services, farm diversification and equine enterprises.
2034/178	De Montfort University	CS Policy 17 sets out where development will take place in the rural areas and the scale of growth. Some 376 dwellings are proposed at the Rural Centres and at selected rural villages. This figure would appear unbalanced and unsustainable when compared with the 350 dwellings proposed to be allocated within the Leicester Urban Fringe.	The policy explanation in paragraph 6.59 states the: "strategy for rural areas seeks to redress past trends in Harborough District which have seen a relatively large proportion of housing development taking place in rural vii/ages (38% of completions since 2006). This pattern of development is not sustainable in the long term. "Nevertheless allocating a further 376 dwellings to the rural area will not alter this trend but will continue this unsustainable pattern of development. RPS therefore object to the level of housing proposed for the Rural Area and recommend that a proportion of its 376 dwellings be reallocated to the more sustainable settlements such as the Leicester Urban Fringe.

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2039/196	Mr & Mrs Woodcock	<p>Policy 17: Countryside, Rural Centres and Rural Villages identifies six Rural Centres across the District: Billesdon; Fleckney; Great Glen; Husbands Bosworth; Kibworth Beauchamp and Ullesthorpe. Part a) of the Policy indicates that 376 dwellings will be provided in the rural area, at the Rural Centres of Billesdon, Fleckney, Husbands Bosworth and Ullesthorpe and at selected rural villages.</p> <p>We support the identification of Billesdon as a Rural Centre. The settlement has a wide range of key facilities and services as well as a regular bus service linking the settlement to higher order services and job opportunities in Leicester and Uppingham. As such, the Core Strategy correctly recognises that Billesdon is able to support future housing growth. In addition, we support the decision not to include Great Glen and Kibworth in the residual rural total of 376 dwellings. This is because Great Glen and Kibworth already have large scale commitments at Stretton Road and Wistow Road respectively, and any further growth at these settlements could preclude further development to address local housing need in the other Rural Centres.</p> <p>Part a)v) of Policy 17 recognises that greenfield land adjoining settlements will be required to address future housing need. We support this, but would stress that the identification of sites will need to be supported by an up-to-date SHLAA assessment. The current 2010 update only identifies committed Rural Centre sites, i.e. those that already have planning permission. In order to meet the residual rural requirement for 376 dwellings, a further assessment of rural housing sites will need to be carried out.</p>	
3653/198	Mrs R Black	<p>Para 6.63 sets out criteria for selection of Rural Centres.i.e. four out of six relevant services. Houghton on the Hill is strangely notable by its designation as a Rural Village rather than as a Rural Centre considering it has two food shops, a post office, a primary school and two pubs. I therefore submit "that the choices made in the plan are NOT backed up by the facts."</p>	Houghton on the Hill to be redesignated as a Rural Centre. Less dwellings would then be distributed to each village negating the very real danger of disproportionate allocation to the the existing villages.
3601/213	Mowsley Parish Plan Group	We welcome aspiration to improve rural connectivity speeds. We welcome designation of Laughton Hills as an area of landscape character and would support its protection	
3631/215	Dr K Feltham	Inconsistency between Para 5.53, Policies 17 b) and 17 d). The necessary framework, including super-fast broadband and 3G mobile network reception, is needed to encourage a range of employment opportunities in rural villages and across the rest of the district. This digital connectivity will help support working and shopping from home.	Include HDC to work with business to obtain an increase in high-speed broadband connectivity and the implementation of 3G mobile telephone network reception throughout Harborough District. The Culture Secretary, Jeremy Hunt, announced £830m on 6 December 2010 for the community hubs scheme upto 2015, with the onus being on local authorities to work with community groups on the super-fast broadband hubs and connectivity.
3631/217	Dr K Feltham	The specific paragraph 6.60, especially the sentence referring to the Local Plan allocations at Kibworth and Great Glen, and why these two Rural Centres have been excluded from the list of settlements in Policy 17 for further housing developments, is fully supported.	
3631/218	Dr K Feltham	The specific paragraph 6.63, including the list of Rural Villages (September 2010) as being identified for the provision of small allocations of housing, is supported. Rural Villages require small allocations of housing to be sustainable; this policy is welcome.	
3640/225	CASCET - Campaign Against the Stoughton Co-op Expansion Threat	The distribution of some 376 dwellings to 2026 across 4 selected Rural Centres and selected Rural Villages means these settlements can improve sustainability and hopefully keep their existing services. It is also important to the rural economy of Harborough that super-fast broadband and 3G mobile network reception, is enhanced to encourage a range of employment opportunities in rural villages and across the rest of the district. This digital connectivity will help	

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		support working and shopping from home and also help ease traffic congestion.	
2042/242	Western Range	<p>The aim that the designated Rural Centres, including Fleckney will consolidate their role and will be the focus for rural affordable and market housing, employment, retail and community uses to serve their rural catchment is supported. However, it is considered that the criterion set out in a) is overly restrictive in seeking to ensure that development will meet a demonstrable local rural housing need as this implies that additional development should cater simply for movement of local people within the catchment and not new residents relocating from other areas.</p> <p>Furthermore, the requirement that developments will prioritise previously developed land (PDL) over greenfield sites (as a result of iv appearing before v in the policy text is also not supported in the light of the SHLAA evidence set out in paragraph 5.21.</p>	<p>Delete ii) from criterion a) with its reference to local need</p> <p>Alter points iv) and v) of criterion a) such that PDL is used where this is available and greenfield land also being used, at a scale appropriate to the settlement and its setting and form.</p>
2045/254	David Wilson Homes	<p>The aim that the designated Rural Centres, including Billesdon will consolidate their role and will be the focus for rural affordable and market housing, employment, retail and community uses to serve their rural catchment is supported. However, it is considered that the criterion set out in a) is overly restrictive in seeking to ensure that development will meet a demonstrable local rural housing need as this implies that additional development should cater simply for movement of local people within the catchment and not new residents relocating from other areas.</p> <p>Furthermore, the requirement that developments will prioritise previously developed land (PDL) over greenfield sites (as a result of iv appearing before v in the policy text is also not supported in the light of the SHLAA evidence set out in paragraph 5.21.</p>	<p>Delete ii) from criterion a) with its reference to local need</p> <p>Alter points iv) and v) of criterion a) such that PDL is used where this is available and greenfield land also being used, at a scale appropriate to the settlement and its setting and form.</p>
2048/269	A Walter Smart & Son	<p>We consider that the policy should take a more flexible approach towards the loss of employment land, particularly in village locations such as Houghton-on-the-Hill, where existing employment sites may no longer meet occupier requirements and would therefore be more appropriately used for other uses including residential development. We suggest that the policy should include a criteria based policy to reflect this as outlined below.</p>	<p>Policy 17 d)</p> <p>Key Employment Areas in Rural Centres will be identified and protected from changes of use which may limit future business development. To support their designation as Rural Centres and improve their sustainability Billesdon, Fleckney, Great Glen, Husbands Bosworth, Kibworth and Ullesthorpe will be considered preferred locations for employment provision in the rural area in the review of existing employment sites and allocations. Both these will be carried out as part of the Allocations Development Plan Document. Employment development within the countryside will be supported where it contributes to the retention and viability of rural services or land based businesses, aids farm diversification or re-uses vacant / derelict buildings worthy of retention.</p> <p>We suggest that the following wording is added to the policy:-</p> <p>The Council recognises that existing employment sites in village locations may no longer be required and may be more effectively used for another use. Where a change of use from an existing employment site is proposed, the Council will require applicants to provide information on why the employment site is no longer suitable for employment use. This will include information such as an assessment of the quality of the accommodation, information on local demand and supply and evidence of marketing.</p>
3613/274	Billesdon Parish Council	<p>No evidence is produced to justify the limitation of Rural Centres to 6 villages. There are more than 6 villages with the required number of services to be classified as Rural Centres. A selection process has been applied that is not in evidence.</p>	<p>Apply the test of the number of required services to all villages and thereby increase the number of Rural Centres in the list.</p>
3613/275	Billesdon Parish Council	<p>Several of the selected 'Rural Villages' have a sufficient number of services to be classified as 'Rural Centres' (e.g. Houghton on the Hill; Great Easton). No evidence is presented to justify their classification as 'Rural Villages' rather than 'Rural Centres'.</p>	<p>Reclassify relevant 'Rural Villages' as 'Rural Centres' and add to the list of Rural Centres throughout the Core Strategy Document.</p>

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3617/287	Bovis Homes	The principle of Policy 17 is supported by Bovis Homes albeit to reflect the suggested changes to Policies 1 and 2, Policy 17 requires changing.	The change suggested is: The Key Rural Centres of Fleckney, Great Glen and Husbands Bosworth will be the main focus of housing, employment, retail, community and other forms of development within the rural area. The Rural Centres of Billesdon, Kibworth Beauchamp and Ullesthorpe will consolidate their role as Rural Centres through some limited growth including rural affordable and market housing, employment, retail and community uses to serve their rural catchment areas. In other selected rural villages, housing development which contributes to meeting an identified need for affordable dwellings and which helps protect existing services will be provided.
2054/322	Wheatcroft & Son	<p>We support the reference in Policy 17 that Fleckney will be classified as a Rural Centre and will consolidate its role as a focus for rural affordable and market housing, additional employment, retail and community uses to serve its rural catchment area.</p> <p>Fleckney is a highly sustainable settlement with an excellent range of facilities and services. It has an existing industrial estate where there is land adjacent to it, which would form a logical extension and a rounding-off of the village. It is opportunities such as these where the landowner is seeking to bring forward the land for development and has received strong interest from local firms wishing to expand in the locality that needs to be given consideration. The suitability of our client's site, for employment provision, was recognised in the Council's Site Specifics document in 2006 where it was identified as a potential expansion site to the existing industrial park. There is also land surrounding the village which would be suitable for residential development.</p> <p>We recognise that it is sometimes preferential to develop previously developed land within the existing confines of the village before Greenfield sites outside of the confines. However, we consider that the Council should be open to the possibilities of bringing forward land outside of the confines where there is an identified need for both employment and residential opportunities.</p> <p>As previously stated we consider that Broughton Astley should be designated as a Rural Centre, which is more justifiable due to its size and level of facilities and services. The housing numbers allocated to Broughton Astley should be added to the housing number for the Rural Centres and included within Policy 17.</p>	Broughton Astley should be re-designated as a Key Centre in keeping with the level of services and facilities it provides. Lutterworth should be the only Key Centre in the District. Broughton Astley and its housing provision should be included within Policy 17.
3467/30	Mr J Bayliss	<p>The Policy is unsound by not including Site north of Frolesworth Road, Leire OS 3000 due to its over riding suitability for development. Although this site has been suggested and put forward for development for housing both by ourselves and previous owners over the last 30/35 years, it would appear that little notice has been taken, although the site was proposed by Harborough District Council in 1993/4 along with other sites for development.</p> <p>The site in question has existing development to its adjacent western boundary and any development on this land would form a natural barrier to any future development on its eastern boundary by the Nature Walk (old Railway Line) that exist.</p>	That rural sites that have land suitable for development be included, especially to help with sustainability of village life where nearby facilities are available i.e schools, medical and employment that are close to motorway networks.
2009/42	Cllr G Spendlove-Mason	Great Glen, as a rural centre, has recently had an application for 281 dwellings, on the GG2 site, approved. This is in addition to the 24 houses nearing completion on the old 'Pearl City Restaurant' site. This gives about a ten percent increase in the existing housing stock and should preclude any further residential developments. The infrastructure is already creaking, especially as the village is short of playing fields and does not have a sports hall.	Great Glen, as a rural centre, has recently had an application for 281 dwellings, on the GG2 site, approved. This is in addition to the 24 houses nearing completion on the old 'Pearl City Restaurant' site. This gives about a ten percent increase in the existing housing stock and should preclude any further residential developments. The infrastructure is already creaking, especially as the village is short of playing fields and does not have a sports

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2055/369	Leicestershire County Council		The provision of some local serviced offices might reduce the need for people to travel to conduct business elsewhere. Widen the scope of what might be considered appropriate employment provision in such areas.
2055/370	Leicestershire County Council	The scale of proposed development for the Rural Centres and Rural Villages is supported, especially considering the high levels of past completions and current commitments.	Sites in other Rural Centres such as Ullesthorpe and Husbands Bosworth could provide for further sustainable development to provide for local housing needs.
2055/371	Leicestershire County Council	The Policy does not provide any flexibility to support the needs of individual rural communities (i.e. settlements not identified as "Rural Centres" and "Selected Rural Villages") on their merit.	The Plan should encourage economic development and help establish new services in rural communities.
2055/372	Leicestershire County Council	The Policy seeks to "protect" local services but this intent should be more than aspirational. The Plan should encourage economic development and help establish new services in rural communities. The sectors identified as permissible in the "countryside" are unnecessarily restrictive. Allowing high value small home-based businesses to expand will help grow Harborough's rural economy whilst not having any detrimental impact on the environment or settlement distinctiveness.	Opportunities to support non-intrusive live/work schemes and support home-based businesses should be explored. A more flexible approach which allows for the needs and opportunities within individual villages and rural communities to be met should be taken.
2055/373	Leicestershire County Council	There is an inconsistency between Policies 17 b) and 17 d). 17 b) comments on the need to reduce the need to travel but 17 d) does not provide the necessary framework to encourage an increase in the range of employment opportunities which will help achieve this. Policy 17 b) is supported where it would support rural development which will reduce the need to travel. However, it is vague and the action of the Council is not specific, particularly in its encouragement of an increase in broadband connectivity.	The Plan should encourage an increase in connectivity.
2058/389	Constable Maxwell	As stated in response to Policy 1 and Policy 17 the identification of the Rural Centres of Billesdon, Fleckney, Great Glen, Husbands Bosworth, Kibworth and Ullesthorpe to provide a focus for rural affordable and market housing, additional employment, retail and community uses to serve their rural catchment areas is supported. It is considered that in seeking to develop Husbands Bosworth as a Rural Centre, suitable and sustainable sites such as land to the east of Husbands Bosworth, off Theddingworth Road (A4304), should be allocated for development in the Allocations DPD. It is however considered that the limited housing provision for the Rural Centres currently to be distributed between Fleckney, Billesdon, Ullesthorpe and Husbands Bosworth should be split amongst all of the Rural Centres identified in Policy 1, including Great Glen and Kibworth.	
2059/392	Mr S Nanuwa	As with Policy 1, Policy 17 seeks to consolidate the role of the Rural Centres of Billesdon, Fleckney, Great Glen, Husbands Bosworth, Kibworth and Ullesthorpe to provide a focus for rural affordable and market housing, additional employment, retail and community uses to serve their rural catchment areas; this is supported. However, the principle is somewhat contradicted by the text contained in Point a) of the policy which states that "376 dwellings will be provided in the rural area, at the rural centres of Billesdon, Fleckney, Husbands Bosworth and Ullesthorpe". The provision of dwellings in the rural centres does not include Great Glen or Kibworth. Explanatory paragraph 6.60 states that due to the outstanding commitments from the Local Plan allocations in Kibworth and Great Glen the villages have been excluded from the list of settlements in the policy. It is considered that this contradiction renders Policy 17 unsound in that it is not 'effective' as the key principle of the	

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		<p>policy, to enhance the role of all of the Rural Centres to serve their rural catchments, can not be delivered. It is considered that in order to be able to deliver the overarching principles of the Core Strategy, and more specifically Policy 1 and Policy 17, which seek to enhance the role of the rural centres to serve their rural catchments, Great Glen and Kibworth should be included along with the other rural centres as able to accommodate some of the 376 dwellings to be provided.</p>	
2060/395	Mrs J Eastwood	<p>As stated in response to Policy 1 and Policy 17 the identification of the Rural Centres of Billesdon, Fleckney, Great Glen, Husbands Bosworth, Kibworth and Ullesthorpe to provide a focus for rural affordable and market housing, additional employment, retail and community uses to serve their rural catchment areas is supported. It is considered that in seeking to develop Ullesthorpe as a Rural Centre, suitable and sustainable sites such as land to the south of Ullesthorpe, east of the disused railway and west of South Avenue, should be allocated for development in the Allocations DPD.</p>	
2062/401	Ms R Page	<p>The district is predominally rural yet this has not been truly reflected. There has been no rural proofing of the strateg. It also wrongly states that there is a surplus of local services in rural areas which is a false claim and could be used as justification for additional building when in fact the services are inadequate.</p>	
3657/418	Jelson	<p>Jelson is concerned that the approach to these areas is purely a residual one - i.e. they will accommodate simply what is left over after higher order settlements have been considered. There is no specific assessment of the needs or comparative sustainability / suitability of each of the villages that have been lumped together in this category. The core strategy and the evidence supporting it should provide a clear indication of the level of development that is necessary and appropriate in each village, irrespective of how much development is left over. The core strategy currently fails to demonstrate that the strategy is the most appropriate for each settlement concerned and again demonstrates a rigid and inflexible approach. The strategy proposes to exclude Kibworth from the villages to which new development will be directed. This is on the basis that the village already has a large amount of committed development. This strategy is considered to be mis-placed. The commitments in Kibworth are in fact allocations carried over from the previous local plan. That plan and the allocations within it was intended only to cover the period to 2006. The existing allocation KB1 meets the development needs for that plan period and not the current period 2006-2026. It is clearly inappropriate to prevent further development to meet the villages future needs on the basis that previous needs have yet to be fulfilled. In fact the failure to deliver the previous local plan allocation brings significantly into question the deliverability of the site in question and highlights the need to identify alternative or compensatory provision in the village. Jelison have available land in the village that could be brought forward to meet the as yet unmet historic need and future need but the decision of the Council to block further development until KB1 is developed threatens to undermine the overall delivery strategy. Yet again this highlights a rigidity to the plan that seriously threatens its deliverability.</p>	
2067/438	Davidsons Group Ltd	<p>Policy 17: Countryside, Rural Centres and Rural Villages identifies six Rural Centres across the District: Billesdon; Fleckney; Great Glen; Husbands Bosworth; Kibworth Beauchamp and Ullesthorpe. Part a) of the Policy indicates that 376 dwellings will be provided in the rural area, at the Rural Centres of Billesdon, Fleckney, Husbands Bosworth and Ullesthorpe and at selected rural villages. We support the identification of Billesdon as a Rural Centre. The settlement has a wide range of key facilities and services as well as a regular bus service linking the settlement to higher order services and job opportunities in Leicester and Uppingham. As such, the Core Strategy correctly recognises that Billesdon is able to support future housing growth.</p>	

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		<p>In addition, we support the decision not to include Great Glen and Kibworth in the residual rural total of 376 dwellings. This is because there are already large scale commitments at Stretton Road, Great Glen and Wistow Road, Kibworth, and any further growth at these settlements could preclude further development to address local housing need in the other Rural Centres. Part a)v) of Policy 17 recognises that greenfield land adjoining settlements will be required to address future housing need. We support this, but would stress that the identification of sites will need to be supported by an up-to-date SHLAA assessment. The current 2010 update only identifies committed Rural Centre sites, i.e. those that already have planning permission. In order to meet the residual rural requirement for 376 dwellings, a further assessment of rural housing sites will need to be carried out.</p>	
2073/453	Leicester Diocesan Board of Finance/Carr/Bowie/Murmann/John	<p>37% of the District's population live in the towns of Market Harborough and Lutterworth. The remaining 63% live in villages ranging in size from small hamlets to the largest village, Broughton Astley. All of the District's settlements serve the rural area by varying degrees, and this is recognised in para 6.57. We have argued elsewhere, in relation to the Spatial Portrait and Strategy, that Broughton Astley, Fleckney, Kibworth and Great Glen are the rural centres which genuinely serve a wider rural area blow the level of the two towns. Billesdon, Ullesthorpe and Husbands Bosworth are smaller settlements with a more restricted function, and should not be in the same category as the aforementioned four larger settlements. Indeed, there are other villages which might be considered as 'Rural Centres' for the purpose of achieving improved services and facilities, and sustainin services in the more rural..e.arts of the District. This strate needs re-examinin, to ensure that the key issues are capable of being addressed effectively.</p>	Great Glen, Kibworth and Fleckney should be retained as Rural Centres. Billesdon, Husbands Bosworth and Ullesthorpe are not Rural Centres, but along with other similar sized villages, should be the focus for limited development.
2074/458	Mrs P Hays	<p>We support the designation of rural centres. However, we consider that the amount of new housing to be provided in these centres and also in the rural area should better reflect its overall share of the District population (ie around 57%). This will require a significant uplift in the number of houses to be built in these settlements from 376 to a significantly higher figure (and reflect the explanation in Para 6.60)- see also representations on Policies 1 and 2. The affordable element should be a maximum of 30% of total dwellings on qualifying sites (refer representations on Policy 3). We are concerned that development in these settlements will not be able to commence until the Allocations DPD is adopted. We note that preparation of this document has slipped and that adoption is till several years away. A criteria policy should be included under policy 17 which facilitates sites in rural centres another rural villages to come forward subject to meeting requirements for community support as set down in the Localism Bill.</p>	Policy 17 to be amended to increase the overall level of provision in Rural Centres and other rural villages to reflect the rural areas share of the District population and for affordable housing to be set at a maximum of 30% of all units built. Policy to include criteria to enable housing sites to come forward prior to the adoption of the Allocations DPD .
2075/460	Andrew Granger & Co on behalf of various clients	<p>We have made separate representations which also relate to this policy and these should be referred to. Whilst in the main the supporting text to the Core Strategy relates to shaping where major new housing and employment land should be directed, the difficulty of finding solutions to meeting new housing needs in smaller villages remains a problem. There are a number of Selected Rural villages identified at 6.63, and it is noted that this list will be amended as necessary. This presumably reflects the difficulty of new village housing and impact, and it is hoped that the more open agenda of local determination will be recognised in this process. The regret, and conundrum, is that the list of 'suitable villages' gets smaller; and yet seemingly more people want to live in these villages. The Council may need to be more flexible in this respect, particularly in conjunction with affordability and employment.</p>	In addition to the proposed changes to the policy made elsewhere the Selected Rural Villages should be identified in the policy; and others given further consideration
2079/476	Mrs A Snell	By only including areas/settlements within the Leicester Urban Fringe, Lutterworth, Broughton Astley and Market Harborough the SHLAA has omitted to include any sites such as Folesworth Road, Leire that would appear to an ideal site for development. The land is of porr argicultural	To give consideration to villages that have suitable sites that would meet the criteria for development i.e. be located in such a position that they have facilities nearby at hand such as schools, medical, shops and employment

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		use and would seem to be only used to exercise the old horse. It would tidy the area from its present state and form a good boundary to the Western side of the village with the old railway line preventing any further development beyond that point, Oak Avenue being on the eastern side. Schools, shops and medical facilities being within 0.5 miles of the site. Local business's would benefit from more development in the village. Employment on hand locally at Magna Park and the nearness of the motorway networks would help assist help.	and so add to the sustainability of village life.
2081/493	Bitteswell Parish Council	The settlement classification of Selected Rural Village has not been evident in any of the many earlier versions of the Core Strategy. Indeed, rather surprisingly, it has first appeared in the present Publication Draft. Thus, it has not been subject to scrutiny or exposed to any measure of consultation. Parish and other subordinate local councils have received no formal notification of the proposed new classification. A key objective of consultation in the planning system is to ensure that communities are not confronted with 'surprises'. In the light of this complete absence of engagement with local councils and communities this classification should be withdrawn pending exercise of the due process of consultation. Furthermore, the arbitrary nomination of 16 rural villages as centres for development will damage the rural character of many settlements thereby devaluing a prized asset of the Harborough District. In this regard the proposed Countryside Policy is wholly at odds with the thrust of the Vision presented in the Harborough Sustainable Community Strategy.	
2081/536	Bitteswell Parish Council	Paragraph 6.57 offers the view that certain villages, which have a limited range of services, may 'benefit from the support of development.' The record demonstrates that very few if any residents of villages welcome proposals for development in their settlement. We believe that it is also the case that village communities are unlikely to be persuaded from this stance by promises of 'enhancements' made by developers. To avoid any pursuit of this proposition being construed as a pretext for development, the residents of the nominated villages should be consulted by the District Council to confirm, by due process, that they do, or do not, wish to be so nominated.	
2081/537	Bitteswell Parish Council	The conditions for allowing rural development are set out on this page. Condition (a){v} states: 'Use greenfield land adjoining Limits to Development of Rural Centres and Selected Rural Villages at a scale appropriate to the settlement and its setting and form'. This condition would vitiate the intent of the policy of Limit to Development. For likewise reasons of logical inconsistency, comment on this issue was made in respect of paragraph 5.6 (e) on page 25 of the Core Strategy. It is plain that if development is allowed on land adjacent to or outside the existing Limits to Development then the whole purpose of the policy of Limits to Development would be rendered meaningless; it would compromise the 'certainty and predictability' that the Plan-led system is intended to provide. It is recommended that this paragraph is subjected to critical review.	
2081/538	Bitteswell Parish Council	The classification of Selected Rural Village has been introduced for the first time in the Publication Version of the Core Strategy issued in October 2010. As the term has not appeared in any of the several earlier drafts it has not been exposed to any stage of the consultation process and, thus, communities have not had opportunity to comment. In view of this grave breach in observance of the requirements expressed in PPS 1 for opportunity to be given to communities to fully participate in the process for drawing up specific policies, and undertakings given in the District Council's own Statement of Community Involvement, the classification of Selected Rural Village should be withdrawn.	
2081/539	Bitteswell Parish Council	In the light of the total absence of any consultation and the application of an arbitrary and flawed set of criteria, the shortcomings of which we have commented on earlier in this Note, the Parish	

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		Council rejects the classification of Bitteswell as a Selected Rural Village.	
2082/560	Mr B Bosworth	<p>The land north of Frolesworth Road, Leire should have been considered under the SHLAA - by excluding this site all parties involved have not been able to put their case forward to comment on the site. In only considering areas/settlements within of adjacent to Leicester Urban Fringe, Market Harborough, Lutterworth the SHLAA has failed to include land north of Frolesworth Road, Leire and therefore not considered this site's merits. By only considering areas/settlements suitable villages such as Leire have been excluded. Leire I feel should have been considered ad developed in this village. It would have helped to sustain its viability abd future of tis local employment. Further facilities such as medical, schools and shops are available in Broughton Astley (0.5 miles). Employment being available in nearby Magna Park (2 miles) or through the nearby motorway network (M1, M6, M69). The site has good frontage to Frolesworth Road and is adjacent to Oak Avenue and The Old Railway would form a boundary.</p>	To include any villages that have suitable sites for development where ground lies so as to blend in with existing housing and form a compact area for any type of further development.
2083/564	Lafarge Aggregates Ltd	<p>Minerals can only be worked where they are found and therefore in the majority of cases, quarries are located within the countryside. They are defined as development which in principle is acceptable in the countryside. Currently the wording of this policy restricts development to only that required for the purposes of agriculture, woodland management, sport and recreation, local food initiatives and uses which support visits to the District. We recommend minerals developments (including associated facilities/infrastructure) are included within the definition of acceptable development in the countryside.</p> <p>Whilst we are satisfied that the current Core Strategy and the strategic allocation of growth does not appear to be impacting upon existing and potential mineral operations, for the Core Strategy to be sound we recommend that the above policies are amended to reflect all types of development that may be located within the plan area across the plan period.</p>	
2085/572	Natural England	<p>Natural England particularly supports the inclusion of paragraph (c) of the policy wording that rural development will be planned so it is sensitive to its landscape setting, and will enhance the distinctive qualities of the landscape character area in which it is situated. We endorse the eight bullet points that this paragraph contains which we consider makes a strong planning framework for the protection and enhancement of the natural and visually important features of the countryside.</p>	
2013/52	Swift Valley Partnership	<p>Land North of Frolesworth Road, Leire - By focussing purely on areas/settlements within or adjacent to the Leicester Urban Fringe - Market Harborough, Lutterworth and Broughton Astley - the SHLAA has excluded this site from being given any consideration and therefore unfairly prejudiced its consideration on merit.</p> <p>The fundamental approach of only considering sites within these locations precludes any new developments to the other villages, which we believe is flawed. The villages not considered need growth to survive. Eminently suitable sites such as this have so far been excluded from any sensible and rational consideration. We therefore object to the approach taken so far and find this element of the Core Strategy and the SHLAA approach to be flawed and prejudiced from the outset.</p> <p>This site should have been considered under the SHLAA and any reasons for its inclusion or exclusion should have been addressed at that time. This would have granted all parties an opportunity to make comment on the site.</p> <p>"The purpose of this study is to assess housing potential only." It has not, as it has had an inbuilt prejudice against the consideration of certain sites right from the outset. All potential sites should have been considered and their merits or disadvantages listed. Para 2.5.4 in the SHLAA Sept 10 report states that: " ... sites below Key Centres are therefore not considered ... ", as they are " ...</p>	<p>We ask for this site to be considered against the merits of sites which have been included and in comparison it will be shown to be equally as sustainable and far more acceptable in terms of many criteria. The site is readily available for development and could be included within the next five years allocation of available residential housing land supply.</p>

less suitable for significant new housing development in sustainability terms".

The site proposed is within five minutes travel time of the largest employment site within the district - what is not sustainable about this? We therefore object to the initial assessment made as to what constitutes sustainability. The location of the site is very sustainable due to its proximity to Magna Park, Lutterworth and Broughton Astley.

As the site is excluded from the 2009 and 2010 SHLAA assessments, reasons for its inclusion or exclusion were not assessed against the criteria set out in 2.9.2. We have in previous submissions, however, shown that on every count the site would pass the policy restrictions. The site has no physical constraint that prevents development. It is fully serviced, has no access/highways issues and is fully available to be developed and meet part of the five-year housing land supply requirement.

The site could provide towards meeting the shortfall of 172 dwellings identified by the SHLAA required for the next five-year plan period. The site is likely to provide approximately 20 to 30 dwellings, a number that could easily be absorbed into the existing village fabric with no disruption. Such a small scale increase to the numbers of dwellings within the existing village would help sustain the village and would be easily absorbed with minimal disruption to the existing village life.

Many of the sites proposed in Market Harborough and Broughton Astley are as far away from the local shopping centre facilities as is this site. The travel distances are similar for many of the sites to local facilities as our proposed site. It is inevitable that they will travel by car from many of the proposed sites.

The initial criteria over the sustainability of the locations is therefore a false assumption. This has led to the exclusion of this site from consideration in favour of sites which offer no greater benefit to their sustainability credentials than does this site. In many instances the resulting pressures on local infrastructure will be much greater. The site has well-defined defensible boundaries which will not lead to further progressive development. It is hoped that this site will be considered under The Core Strategy October 2010 Policy 17, whereby 376 dwellings are to be considered for allocation to rural centres and villages. Leire is not listed as meeting all of the requirements as set out on this policy but it does. The principle facility lacking within the village being a shop, post office or school. The existing post office/shop closed recently and that facility is under consideration for the removal of the retail designation by way of a planning application. However, it does still officially exist and Leire also has a nursery school meeting 5 days a week from the village hall. Through the development of this site either a new shop/post office facility could be provided on site or located elsewhere within the village. Financial assistance to encourage the provision of a new grocery shop and post office could be given and the landowners would be prepared to set aside land upon which to build such a new facility.

The provision of this facility would sustain and improve the local rural community. The village does have a thriving village hall which hosts a day nursery school every weekday and many other community activities and is far more actively used than many village halls. This facility should carry as much weight in the consideration for Leire as a suitable village as the provision of a school within the village. Leire therefore has two existing facilities that count when considering the village as being suitable. The fact that Leire does not have a primary or secondary school will not result in more children being bussed to outside facilities. The bus services already exist for the present children and will not increase due to the small increase in numbers proposed. The reverse is probably true, the extra numbers will help support the existing services. The main principles applied in the past when considering the site are that it is outside of the defined limits of the village boundary. The correct method for seeking to redefine the limits of the village is through consideration under the LDF and this is what we are asking to be considered. We request that the village defined limit be moved to the more defensible boundary of the dismantled railway line with the inclusion of the land shown on the enclosed plan redefined as within the village envelope.

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		<p>Under a previous planning application, ref. no. 09/01051/OUT, issues regarding access for an adopted road onto Frolesworth Road and drainage for foul and surface water were addressed and no objection was made to this application on these grounds. We therefore consider that issues relating to highways and drainage have been previously addressed and that the development of the site could proceed once consent was granted, to include the site within the village envelope.</p> <p>This apart, other factors already mentioned in the preceding text show that the village is in such close proximity to Magna Park for employment purposes and Broughton Ashley's existing facilities that it should be considered on its own merits.</p> <p>Workers from Magna Park regularly visit the White Horse Inn in Leire for their lunch break. The proximity of the two permits this interaction for their relatively short break at lunch. If provision were made for more of them to live in Leire they would spend less time travelling to work than they do at present. This is a sustainable issue of major positive importance at present, not given any weight in the Core Strategy.</p> <p>Broadband is available in the village at good speeds of up to 20Mb download speeds, and many people shop online. Some dwellings within the scheme could be provided as live/work units, helping to meet local employment needs.</p> <p>The land at Leire would particularly satisfy policies concerning boundary landscapes, having an established defensible boundary of dense landscaping. It is not prominent visually from external views or approaches to the village, only from Frolesworth Road when opposite the site itself. It is proposed to strengthen the landscape planning between the site and the boundary along the disused railway line and Frolesworth Road.</p>	
2013/53	Swift Valley Partnership	<p>Land off Fairway Meadows, Ullesthorpe - By focussing purely on areas/settlements within or adjacent to the Leicester Urban Fringe - Market Harborough, Lutterworth and Broughton Astley - the SHLAA has excluded this site from being given any consideration and therefore unfairly prejudiced its consideration on merit.</p> <p>The fundamental approach of only considering sites within these locations precludes any new developments to the other villages, which we believe is flawed. The villages not considered need growth to survive. Eminently suitable sites such as this have so far been excluded from any sensible and rational consideration. We therefore object to the approach taken so far and find this element of the Core Strategy and the SHLAA approach to be flawed and prejudiced from the outset.</p> <p>This site should have been considered under the SHLAA and any reasons for its inclusion or exclusion should have been addressed at that time. This would have granted all parties an opportunity to make comment on the site. "The purpose of this study is to assess housing potential only." It has not, as it has had an inbuilt prejudice against the consideration of certain sites right from the outset. All potential sites should have been considered and their merits or disadvantages listed. Para 2.5.4 in the SHLAA Sept 10 report states that: " ... sites below Key Centres are therefore not considered ... ", as they are " ... less suitable for significant new housing development in sustainability terms".</p> <p>The site proposed is within five minutes travel time of the largest employment site within the district - what is not sustainable about this? We therefore object to the initial assessment made as to what constitutes sustainability. The location of the site is very sustainable due to its proximity to Magna Park, Lutterworth and Broughton Astley.</p> <p>As the site is excluded from the 2009 and 2010 SHLAA assessments, reasons for its inclusion or exclusion were not assessed against the criteria set out in 2.9.2. We have in previous submissions' however, shown that on every count the site would pass the policy restrictions. The site has no</p>	<p>It is hoped that this site will be considered under The Core Strategy October 2010 Policy 17, whereby 376 dwellings are to be considered for allocation to rural centres and villages. This site meets all of the proposed requirements for location and sustainability as set out in this policy.</p>

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		<p>physical constraint that prevents development. It is fully serviced, has no access/highways issues and is fully available to be developed and meet part of the five-year housing land supply requirement.</p> <p>The site could provide towards meeting the shortfall of 172 dwellings identified by the SHLAA required for the next five-year plan period. The site is likely to provide approximately 20 to 30 dwellings, a number that could easily be absorbed into the existing village fabric with no disruption. Such a small scale increase to the numbers of dwellings within the existing village would help sustain the village and would be easily absorbed with minimal disruption to the existing village life.</p> <p>Many of the sites proposed in Market Harborough and Broughton Astley are as far away from the local shopping centre facilities as is this site. The travel distances are similar for many of the sites to local facilities as our proposed site. It is inevitable that they will travel by car from many of the proposed sites.</p> <p>The initial criteria over the sustainability of the locations is therefore a false assumption. This has led to the exclusion of this site from consideration in favour of sites which offer no greater benefit to their sustainability credentials than does this site. In many instances the resulting pressures on local infrastructure will be much greater. The site has well-defined defensible boundaries which will not lead to further progressive development.</p> <p>Broadband is available at good speeds of up to 20Mb download speeds.</p> <p>The land at Ullesthorpe is partly brownfield due to the existing services which cross the site and the dismantled railway line. It is not prominent visually from any external views or approaches to the village. It is only viewed from the golf course and would therefore differ little from the existing arrangement. It is proposed to strengthen the landscape planning between the site, the golf course and the railway land where some parts already have substantial landscaping in place. We ask for this site to be considered against the merits of sites which have been included and in comparison it will be shown to be equally as sustainable and far more acceptable in terms of many criteria. It is readily available for development and could be included within the next five year allocation of available residential housing land supply.</p>	
3509/59	Mrs J McVeigh	<p>Policy 17 in relation to Great Glen as a Rural Centre. Great Glen needs more affordable housing as well as additional employment opportunities. The area of land between the old A6 and the bypass could be put to better use, in particular relating to employment with good access onto the bypass. Housing could also be put in that area again relating to the acces to the bypass. This would be infill and contained and not going out into the open countryside as in further along the Stretton Road area where the infrastructure is not very good. I am not a planning officer but just looking at the landscape of the area it could be put to better use. The land between the A6 and the bypass on the whole is just left and very little farming is now being carried out. Surely by using this land for commerical and or housing you have the links into the road system already with then good transportation route links. Likewise if housing was put into this area the access the links are very good. Employment opportunities would be brought into the area with the building work. Also if commerical enterprise was in the area jobs would be created and would help sustain the local economy. By creating employment you could then cut down on the travel to other areas.</p>	<p>By bring in more opportunitites for the Rural Centres of Fleckney, Great Glen etc</p>

Multiple Policy Representations

Ref ID	Representor	Policy	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2030/135	Hinckley & Bosworth Borough Council	2, 17	<p>Having an overarching housing requirement for a number of rural settlements is not effective as it provides uncertainty as to the level of growth which is to be contained in a settlement and does not take into account matters which may be imposed by circumstance. For instance, if the local authority were to have a shortfall in its five year supply of housing, there is the potential for an application to be submitted within/adjacent to one of the settlements listed in the policy for a significant amount of the total housing requirement. The housing requirement is not identified as being a minimum so if this allocation is met in potentially a single location it is not clear if this results in no further housing allocations in the other settlements. This could lead to the housing need in certain settlements not being met. There is no mechanism in place to ensure that this does not occur. The document does not indicate whether this overarching figure will be broken down to a settlement level as part of a separate DPD. If this is the case the DPD is not consistent as individual allocations are identified for other settlements within the Core Strategy such as Broughton Astley. This would mean that an Allocations DPD would also be disjointed and inconsistent as it would be allocating housing requirements to settlements contained within this policy and not to others which already have a housing figure through the Core Strategy.</p> <p>It is acknowledged that the settlements with a housing requirement are within a different settlement hierarchy, however the same process to identify individual settlement housing allocations would have been undertaken to identify the overall housing figure contained within policy 17. As a result, housing potential within these settlements will have been investigated as part of this process and therefore it is not effective to delay identifying the housing requirement for these settlements. The housing figure allocated is 376 dwellings; it is not clear whether this is minimum or maximum, if it is a maximum figure this does not provide for flexibility. To identify a maximum figure it requires a significant level of detailed information in relation to future needs and a number of assumptions to be made on information that may not accurately predict future need and is not robust enough to ensure the long term needs are met. As there is an overarching figure within policy 17 it is doubtful that sufficient detail has been considered to enable a robust figure. It is necessary to provide flexibility in the housing numbers as the Core Strategy sets out the long term vision for the District. It enables greater variance to react to changing market requirements, whilst providing the opportunity to allow for a range of different housing types and mix to meet the needs of a settlement inline with the latest Housing Market Area Assessment and local housing needs survey. Presently the Core Strategy does not provide the flexibility and is against PPS3 that states that one of the 'Government's objectives is to ensure that the planning system delivers a flexible, responsive supply of land'.</p>	<p>The overall housing figure should be revised and split so that each settlement where housing is necessary has a requirement. This will make the document sound as it will provide consistency throughout the document (and future DPDs), ensuring there is clarity for those settlements affected and making the document more effective in terms of ensuring housing of the correct level is delivered in those settlements listed in the policy. There should be greater flexibility built into the housing requirement this could be achieved potentially through wording the policy slightly differently, and should be investigated by the Local Authority. Through providing more flexibility this will bring the document into conformity with PPS3.</p>
2030/136	Hinckley & Bosworth Borough Council	2, 13, 14, 15	<p>It is not clear if the housing figures allocated within these policies are minimum or maximum, if it is a maximum figure this does not provide for flexibility. To identify a maximum figure it requires a significant level of detailed information in relation to future needs and a number of assumptions to be made on information that may not accurately predict future need and is not robust enough to ensure the long term needs are met. It is necessary to provide flexibility in the housing numbers as the Core Strategy sets out the long term vision for the District.</p>	<p>There should be greater flexibility built into the housing requirement this could be achieved potentially through wording the policy slightly differently, and should be investigated by the Local Authority. Through providing more flexibility this will bring the document into conformity with PPS3.</p>

Ref ID	Representor	Policy	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
			<p>It enables greater variance to react to changing market requirements, whilst providing the opportunity to allow for a range of different housing types and mix to meet the needs of a settlement inline with the latest Housing Market Area Assessment and local housing needs survey.</p> <p>Presently the Core Strategy does not provide the flexibility and is against PPS3 that states that one of the 'Government's objectives is to ensure that the planning system delivers a flexible, responsive supply of land'.</p>	
2037/186	Aldi Stores Ltd	6, 14	<p>Aldi generally support the retail hierarchy identified under Core Strategy Policy 6 and Table 9. Aldi also support the identification of Lutterworth as a "Town Centre" (ref Table 9), a 'Key Centre' (ref Policy's 1 & 14) and one of 'two main shopping centres in the District' (ref para 5.54).</p> <p>Over the LDF plan period, Aldi anticipate the need for a new Aldi foodstore of circa 1400 sqm (GFA) in Lutterworth, preferably in a Town Centre or nearby location. At this time there are no particular sites or buildings which Aldi have either acquired, or are seeking an ownership interest. Aldi Stores Ltd would therefore welcome early discussion with</p> <p>Harborough District Council on the potential of any particular retail sites which may be considered suitable for discount foodstore occupation.</p>	
3605/214	North Kilworth Parish Council	3, 4, 9	<p>There are fundamental Planning weaknesses in the strategy due to or attributable to the differences which arise from enforcement when consents are passed from an applicant builder to others who move in to suggest amendments and modifications. In North Kilworth we spent considerable time and effort developing a Village Plan which was supposed to have been incorporated into planning guidelines. Initially -due to staff churn- the Department ignored the guidelines and subsequently whilst enforced on households in the village developing property the guidelines have been trashed by most external developers with the complicit assent of the Planning Department with respect to materials, bulking and plan restrictions.</p>	<p>Once plans are agreed by the Parish Council they should not be amended behind our back via agreements with applicants.</p>
3606/256	Mr M van Oppen	1, 3, 17	<p>The representation concerns the treatment of the Selected Rural Villages and in particular Medbourne. Whilst infill development is considered acceptable for this settlement there is no update of the village map to reflect the small-scale development status of the settlement</p>	<p>There needs to be an overhaul of the settlement boundary to reflect the fact that the Core Strategy promotes a more specific development strategy for Medbourne. The policy has been updated but this is not based on any rationale or fresh approach to how the settlement limits are applied. These are still based on the adopted Local Plan boundaries.</p>
2063/410	CHRIS FREEMAN DESIGN LTD	1, 17	<p>THE STRATEGY TO CONCENTRATE DEVELOPMENT AS SET-OUT IS INTENDED TO BE A SUSTAINABLE SOLUTION TO A NEED FOR FURTHER DEVELOPMENT IN THE DISTRICT BUT IN EXCLUDING THE MAJORITY OF RURAL SETTLEMENTS FROM THE HIERARCHICAL PATTERN THE FUTURE OF THESE SETTLEMENTS IS FIXED AS ONE OF ONLY EXTENSIONS AND ALTERATIONS TO EXISTING BUILDINGS AND THE RETENTION IN PERPETUITY OF THOSE VERY SETTLEMENTS THAT HDC CURRENTLY CONSIDER UNSUSTAINABLE DUE TO THEIR LACK OF 'FACILITIES'. THE INEVITABLE CONCLUSION IS THAT THE IDENTIFIED TREND OF FAMILIES MIGRATING OUT FROM CENTRES TO SMALLER RURAL SETTLEMENTS WILL CONTINUE AS DWELLINGS BECOME AVAILABLE AND MORE VALUABLE THOSE DWELLINGS WILL THEN BECOME LARGER AS THEY ARE EXTENDED WITHIN DEVELOPMENT CONTROL AND P.D. LIMITS THUS</p>	<p>THE SUPPOSED UNSUSTAINABLE SMALLER RURAL SETTLEMENTS WITHIN WHICH NO DEVELOPMENT BY WAY OF MARKET HOUSING, ETC., WOULD BE SUPPORTED SHOULD BE ALLOED TO BECOME SUSTAINABLE LOCATIONS THROUGH CAREFULLY CONTROLLED DEVELOPMENT WHICH BRINGS FORWARD SUCH FACILITIES (INITIALLY) AS OCCASIONAL (LATER PERMANENT) DOCTORS & DENTAL SURGERIES, PROMOTE POST OFFICES AND LOCAL SHOPS PERHAPS RUN BY THE COMMUNITIES. SUCH AIMS CAN BE ACHIEVED OFF THE BACK OF SMALL SCALE CAREFULLY CONSIDERED AND SYMPATHETICALLY DESIGNED DEVELOPMENTS WHERE CONDITIONS OF THOSE DEVELOPMENTS ARE THAT THEY ASSIST IN BRINGING SUCH BENEFITS FORWARD. IN THIS MANNER ALL</p>

Ref ID	Representor	Policy	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
			<p>RESULTING ULTIMATELY IN STAGNANT COMMUNITIES WITHOUT ANY SCOPE TO GROW, EVOLVE OR CHANGE BUT, MORE IMPORTANTLY, WITHOUT EVER HAVING THE SCOPE TO BECOME SUSTAINABLE DUE TO THE POLICY SHACKLES THAT THE LDF WILL HAVE PUT ON THEM. THE CONSULTATION PROPOSALS APPEAR TO TAKE NO ACCOUNT OF RAPIDLY ADVANCING TECHNOLOGY IN MOTOR VEHICLE PRODUCTION AND IT IS LIKELY THAT ANY FRAMEWORK ADOPTED ON THIS BASIS WILL THEREFORE BE OUT-DATED BEFORE IT BECOMES POLICY HARBOROUGH IS VERY MUCH A RURAL DISTRICT AS SET-OUT IN THE CONSULTATION DOCUMENT BUT THE CLEAR DIRECTION BEING SET-OUT IS TO BECOME LIKE ANY OTHER DISTRICT BY MAKING MAIN CENTRES GROW WITH LESS SIGNIFICANT AND CONTRIBUTARY RURAL SETTLEMENTS EXCLUDED AND CONSIGNED TO BE UNSUSTAINABLE LOCATIONS FOR THE FORSEEABLE FUTURE</p>	<p>SETTLEMENTS HAVE THE POTENTIAL TO BECOME MORE SUSTAINABLE, RETAIN THEIR VIBRANCY AND WOULD NOT BECOME GHETTOS OF THE RICH IN TIME THUS AVOIDING THE TWO-TIER SOCIETY WHICH IS THE INEVITABLE CONCLUSION OF THE POLICIES AS SET -OUT IN THE CONSULTATION DOCUMENT. WHERE DEVELOPERS ARE ALSO PREPARED TO TAKE SUCH MEASURES AS TO INSTALL HIGHLY EFFICIENT SUSTAINABLE ENERGY AND HEAT PRODUCING SYSTEMS BASED ON RENEWABLES AND PLUG-IN LOCATIONS FOR ELECTRIC VEHICLES POWERED BY ENERGY GENERATED IN THIS MANNER THEIR PROPOSALS SHOULD BE SUPPORTED AND IN THIS MANNER TOO SETTLEMENTS IN RURAL LOCALITIES CAN PROSPER</p>
2070/446	Mr T Frosdick	2, 17	<p>By only considering rural villages that fulfil 2 out of 6 criteria in 6.63, Policy 17, other villages have little or no chance of expansion, leaving them unlikely to be able to maintain or re-gain facilities such as shops, schools and public houses. In effect, villages outside the criteria are being excluded from providing much needed affordable housing, which would bring new & probably younger people into the village, thus ensuring community continuity. Younger families generate a need for primary schools and other facilities, vital for thriving communities. In addition, many such villages lie within close proximity to "Rural Centres", where facilities are currently accessible. The current policy will creat larger, less rural conurbations, isolating smaller villages over time, in planning availability.</p>	<p>Smaller villages, such as Ashby Magna fall outside the development criteria in the core strategy, yet Ashby Magna is less than half a mile from Dunton Bassett, 1.75 miles from Gilmorton and 2.25 miles from Broughton Astley. All with extended facilities and all within walking or cycling distance as well as on bus routes. The attached map indicates land to the south of Ashby Magna suitable for inclusion within limits to development.</p>

General/Unspecified Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2001 / 2	Mr R Jones	I do take issue with one of your main considerations and impetus to your conclusions. I am referring to your many pointers to 'climate change' which is unproven science - a fact that I hope you are aware. This has led this document to demonise the motor car. We who live in the Harborough rural area, need and depend on our cars. We need the oxygen and carbon gases in order to breathe and vegetation requires carbon to survive. This is basic science so why does your document despise it? In my opinion, your use of the term climate change as a basis for social engineering is pure propaganda. Further, erecting windmills to create electricity is a waste of money - on what will you rely on to supply that energy when the wind fails to turn the turbines? I therefore oppose the building of windmills in the Harborough area.	
2003 / 5	Ministry of Defence	Having reviewed your document, I confirm that we have no specific comments to make on this document at this stage.	
2004 / 6	The Coal Authority	Thank you for consulting the Ministry of Defence on the above referenced document. I can confirm at present Defence Estates Safeguarding has no comment to make.	
2031 / 141	Foxton Parish Council	<p>Many of the stated aims are followed by proposed actions that are inconsistent with them. Many of the statements are too vague and give so much room for interpretation they are almost rendered meaningless. We would like the wording to be made much more specific and less vague and less supportive of subjective judgements.</p> <p>Recent decisions regarding the Innovation centre (especially the decision to allow the height to significantly exceed the maximum permitted in the original permission for Airfield Farm) are clearly contrary to many stated aims in the draft policy, especially paragraphs 3.6.5 (protect landscape), 3.6.6 (character of built environment), 3.6.8 (To promote good design which respects, and where possible enhances, its surroundings), 4.1, Policy 1, (b) Develop Market Harborough's role as the main focus for additional development within the District, promoting its historic function as a market town and safeguarding its compact and attractive character); Policy 11 a) Development should be inspired by, respect and enhance local character, building materials and distinctiveness of the area in which it would be situated. The innovation centre already dominates the open countryside to the north of Market Harborough and it neither respects nor enhances the local character of either the open countryside in which it is being built nor the historic nature of the built environment in the town. Nor does it respect the compact nature of the town.</p> <p>In our view, many aims of the Core Strategy have already been flouted before it has even been published. This casts serious doubt on the soundness or effectiveness of the aims within it.</p>	<p>All aims and actions to achieve those aims should be clearer, stronger, more definite, less prone to widely differing interpretations or conflicting judgements. They should be geared to protecting quality of life, countryside, the nature of the built environment and the historic nature of Market Harborough. The actions should not conflict with the aims.</p> <p>Conditions on planning should reflect a GENUINE INTENTION of reducing carbon output. This should be focused on reducing demand on the National Grid by changes to building regulations. Considerable weight should be attached to applications for proven, efficient technologies for energy generation that do not deface the countryside – not those that merely provide the developer with subsidies for intermittent and unreliable energy production.</p>
3590 / 212	Claybrooke Magna Parish Council	Overall a big disappointment as it fails to address many of the issues it should and has not listened to the reasoned debate that went into its creation.	There is no regional plan. Therefore policy should be driven by the needs of the community. This is not the case. The housing requirements for elderly, starters and locals are not taken on board. The community support for these is also not addressed. Lip service is paid to sustainable living, yet here is an opportunity to define how sustainable communities will work. The way the housing provision is structured means that money will not be available to subsidise the starter homes. Development areas are based on numbers of homes assigned to areas rather than developing clusters with work and community integrated into it.
3484 / 31	Dr J Osborne	Sympathetic nature of the plan with existing and recent development - Emphasis on Green Infrastructure	

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2062 / 399	Ms R Page	<p>The strategy document had very limited distribution and marketing to raise awareness and to encourage the buy-in of the public at large.</p> <p>There were too many documents that had to be read in relation to the strategy and asking the general public to give valid planning reasons otherwise they can not object to anything in the proposals is to my mind not acceptable.</p> <p>The forms were leading and were found difficult to fill out and to access by members of the public.</p> <p>This to my mind placed inhibitors on the process and did not ensure total community buy-in or did it foster a truly democratic process.</p>	
2062 / 400	Ms R Page	The strategy places great emphasis on need and delivery but there is no explanation or evidence to how the need has been established and how effective delivery will be ensured.	
2081 / 485	Bitteswell Parish Council	Despite the scope and complexity of the subject the Document is well-written and this has broadly resulted in a clear and readable exposition of the issues. This Council appreciates the increase in the duration of the Consultation period beyond the minimum time prescribed by the relevant regulation, as shown in the Local Development Scheme. However, the adjacency of the consultation period to the Christmas Holiday is likely to result in a significant reduction in the scope for community involvement in the consultation process. Indeed, in the case of this Council, a full set of the supporting documents to the Core Strategy have yet to be received, contrary to the claim in the Covering Letter that copies have been made available to parish councils. In these circumstances it has not, unfortunately, been possible to fulfil our obligation to involve the residents of our Parish in the current consultation on the Core Strategy.	
2081 / 486	Bitteswell Parish Council	The Core Strategy makes reference to the Allocations DPD, and to several other related LDF documents. As these documents are unavailable at the time of this consultation there is, perforce, some limitation of the extent to which this consultation can be comprehensive.	Although the complexity of the topics is recognized, as currently presented, the policies tend to be discursive and lacking in the precision needed to ensure that they remain sufficiently clear and robust throughout the Plan Period (2006-2026) such as to avoid vulnerability to qualification and equivocation in their application. It is suggested that the policies are reviewed in this regard.
2081 / 487	Bitteswell Parish Council	As Harborough is a predominantly rural District, it could be construed as a defect in scope that the Core Strategy includes no specific policy that addresses the issues that attach to farming, or is directed to the wellbeing and fostering of agriculture.	
2086 / 573	Equality and Human Rights Commission	Unfortunately we do not have the resources to respond to consultations unless they concern matters which are directly related to the work of the Commission.	
2015 / 57	Civil Aviation Authority	Thank you for your recent correspondence relating to the Council's Local Developments Framework and Core Strategy. Whilst the CAA would not wish to comment on such plans, where officially safeguarded aerodromes lie within the Council's area of jurisdiction, we recommend that the Council considers the need of such aerodrome(s) within your development plan and consult with the aerodrome operator(s)/licensee(s) directly.	
3523 / 63	Environment Agency	We have reviewed the document and have no further comments to make.	

Key Diagram Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
3575/110	Oadby and Wigston Borough Council	The 'Leicester Urban Fringe' is not a term that is widely recognised outside of Harborough district and needs to be defined. Paragraph 6.29 clarifies that the parishes of Thurnby and Bushby and Scraptoft are included within the Leicester Urban Fringe. It then goes on to say that the Leicester Urban Fringe includes 'a predominately rural area immediately adjacent to Oadby, and located in the north east of Harborough District'. However, this area is not defined within the Core Strategy document or on the Key Diagram. The first paragraph of Policy 15 refers to 'development within and adjacent to the Leicester Urban Fringe settlements'. Without a definition of the Leicester Urban Fringe it is unclear which, if any, settlements within the predominately rural area immediately adjacent to Oadby fall within the provisions of this Policy. It is also unclear whether the map on page 92 shows the whole of the Leicester Urban Fringe or just part of it and this should be clarified. Depending on the area it is intended for this map to cover, it may also be useful to show Oadby on the map.	Define 'Leicester Urban Fringe' and clarify whether the map on page 92 shows the whole of the Leicester Urban Fringe or just part of it. Depending on the area it is intended for this map to cover, it may also be useful to show Oadby on the map.
3575/119	Oadby and Wigston Borough Council	The Key Diagram should indicate main areas of growth and the amount of development proposed.	As set out in representation.
2073/454	Leicester Diocesan Board of Finance/Carr/Bowie/Murmann/Johnson	The Key Diagram illustrates the Council's preferred strategy for meeting its Strategic Objectives. We have made representations to this Strategy which impact on the key Diagram and especially relate to important economic and social determinants, and infrastructure and locational assets which have not been fully recognised. As a consequence Great Glen, Kibworth, Fleckney and Broughton Astley should be retained as Rural Centres; Billesdon, Husbands Bosworth and Ullesthorpe should not be in the same category as they cannot perform the same function.	Identify key economic areas - Market Harborough - Leicester/Oadby and Wigston corridor; and Lutterworth - Blaby/Leicester corridor. Remove Billesdon, Husbands Bosworth and Ullesthorpe from Rural Centre designation; include and retain Great Glen, Kibworth, Fleckney and Broughton Astley as second tier Rural Centres.
2075/460	Andrew Granger & Co on behalf of various clients	We have made separate representations which also relate to this policy and these should be referred to. Whilst in the main the supporting text to the Core Strategy relates to shaping where major new housing and employment land should be directed, the difficulty of finding solutions to meeting new housing needs in smaller villages remains a problem. There are a number of Selected Rural villages identified at 6.63, and it is noted that this list will be amended as necessary. This presumably reflects the difficulty of new village housing and impact, and it is hoped that the more open agenda of local determination will be recognised in this process. The regret, and conundrum, is that the list of 'suitable villages' gets smaller; and yet seemingly more people want to live in these villages. The Council may need to be more flexible in this respect, particularly in conjunction with affordability and employment.	In addition to the proposed changes to the policy made elsewhere the Selected Rural Villages should be identified in the policy; and others given further consideration

Appendix 1 Housing Trajectory Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2036/185	William Davis Limited & Hallam Land Management Limited	<p>We note that the Housing Trajectory sets out the delivery of 1,000 dwellings in a Strategic Development Area north-west of Market Harborough as commencing in 2015/16 and being delivered over a period of 10 years. We have previously made representations in response to consultation on the Strategic Housing Land Availability Assessment that the Airfield Farm development, within this Strategic Development Area, could be delivered as follows:Year No. of dwellings</p> <p>2012/13 50 2013/14 100 2014/15 100 2015/16 150 2016/17 150 2017/18 150 2018/19 150 2019/20 150 TOTAL 1,000</p> <p>In response to our representations the Strategic Housing Land Availability Assessment 2010 Update noted that 'the Agent completed a 2010 SHLAA Pro forma on behalf of the landowners. It was stated that the land could be available for development within the next 3 years. The site is therefore considered to be available'. The Core Strategy Appendix 1 Housing Trajectory does not reflect this evidence of availability and likely delivery. The above projection of delivery is realistic because it is based on the fact that an outline planning application has been prepared for submission in January 2011. Also that a Planning Performance Agreement exists between the Council and the applicants including a commitment to determine the planning application following receipt of the Inspector's Report on the Core Strategy, currently expected to be January 2012. The strategic allocation of land to the north-west of Market Harborough, as set out in our responses to Policies 2 and 13, would also support this.</p>	<p>Revise the Housing Trajectory to show the delivery of housing in Row E as set out in the above table, renaming Row E as 'Planned Growth for Strategic Allocation (North west Market Harborough)'. This would make the Core Strategy Appendix 1 sound because it would relate the Housing Trajectory to the evidence base of when the Airfield Farm site is available and likely to be delivered.</p>
2038/192	Langtree Group PLC	<p>It appears that the trajectory is optimistic in relation to the delivery of some sites. There should be more information in relation to the housing numbers per year expected to come forward on individual sites. Clearly, at the moment housing delivery is at a much reduced rate. Nevertheless, in a good market the average completion rate for housing on a single site by a single builder ranges between 25 and 35 dwellings per annum. Where flats or apartments are involved the average completion rate ranges between 35 – 50 units per annum, as a consequence of how they are constructed.</p> <p>For large sites in a good market where two builders are involved, or where a builder operates the sites as 2 sites (i.e. one producing houses, the other flats) it is reasonable to double the output. Sites in the hands of an individual builder, even with a mix of houses and flats, very rarely exceed 50 dwellings per annum as output and never get to 100. This calculation, however, does not continue to exist where 3 or more builders become involved, as demand will limit take up. It is important when calculating annual outputs that the Council recognises the lead-in times to construction and completion. For example the provision of statutory services to a site can comfortably exceed a year, and it takes approximately 6 months from site start to first house completion. In the case of flatted schemes this period is much longer as large amounts are constructed in one go. It may be appropriate for sites under 50 dwellings to use a 1 year lead in time to obtain planning consent and start delivering on site and for sites over 50 dwellings use a 2 year lead in period before sites actually start appearing on site.</p> <p>If a site is "loaded" with an unachievable completion rate and it is subsequently developed more</p>	<p>Review the trajectory and delivery rates for housing within the district, particularly the Strategic Development Area, and redistribute accordingly.</p>

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2055/374	Leicestershire County Council	<p>slowly than the Council had assumed, then the housing requirement will not be met. It therefore follows that robust evidence on "build out" rates is necessary to inform decisions.</p> <p>The Council should therefore publish the evidence that indicates how the Strategic Development Area is expected to provide 100 dwellings per year from 2015/16 until 2025/25. As discussed it is ambitious for a strategic scheme to deliver 100 units immediately in year one of delivery. From experience we would suggest that the scheme would increase to higher rates of delivery over a period of time. We would therefore suggest that the Strategic Development Area, while providing a solution to delivery of housing in the Market Harborough area and the achievement of the housing requirement and growth should be viewed realistically in relation to housing delivery. The trajectory therefore as published lacks clarity and an evidence base and is therefore unsound.</p>	<p>Since there is no phasing policy within the Pre-submission Core Strategy, the housing trajectory provides the main source of indicating when development is planned to occur. The trajectory suggests that all planned development is expected to occur post 2015. However, the trajectory also establishes that the Council only has a 4.7 year supply for the period 2010-2015, which equates to a shortfall of 104 homes. Lutterworth has experienced low levels of completions and commitments compared with the Leicester Urban Fringe, Market Harborough and the Rural Centres/Rural Villages (as set out in Table 3 of the Core Strategy), and requires development to support the enhancement of the town centre. It is suggested that some of the planned development could be brought forward to the 2010 to 2015 period, including development within Lutterworth.</p>

Appendix 2 Local Infrastructure Plan Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2023/100	Mr R Taylor	Policy 10 Flood Risk (p68) mentions sensitivity of Scraptoft /Thurnby/Bushby to surface water discharge but the Infrastructure Schedule for the Leicester Fringe (p118) does not mention Land Drainage, only sewerage and Water Supply. The same applies for other places. This is contrary to Harborough Sustainable Community Strategic Vision paragraph 2, and contrary to the Harborough Core Strategy Strategic Objective 13.	Add Land Drainage to the Infrastructure Schedule for the Leicester Fringe and other places. Add a note for clarification that the existing balancing ponds off Pulford Drive will not prevent flooding downstream in Thurnby due to Thurnby Brook being in a deep cutting at the balancing pond location.
3575/114	Oadby and Wigston Borough Council	Policy 12 refers to an annual review and update of the Local Infrastructure Schedule. However, it is not clear what relationship the reviewed/ updated document will have to Appendix 2, once the Core Strategy has been adopted.	Provide clarity
2006/13	Slawston Parish Council	The plan will have a considerable impact on the provision of services and traffic congestion within the district. This was emphasised by Parish Chairman at a meeting in July 2010, when it was agreed that the District Council would co-ordinate and quantify this for the Core Strategy. Appendix 2 covers many elements omitting parking and rail services) but most of these elements are quantified and simply left as 'to be determined'. The plan does not measure or even assess the impact of the proposed policies and to this extent it is not robust or complete.	'Yardsticks' should have been used to quantify how many extra police, health professionals, social workers, hospital beds, road improvements, parking spaces, etc., are needed to cater for the growth in population. This has not been done, and the plan is therefore nothing more than a collection of policy statements. This Parish is not opposed to the proposed number/allocation of houses, but we are opposed to its approval until a proper assessment of the impact on services/infrastructure has been completed.
3570/124	Sport England	We are concerned that the evidence base relating to sport and recreation is not up to date or comprehensive. Given this situation, policy 12 and the Local Infrastructure Schedule contained in Appendix 2 are not able to articulate the sporting infrastructure requirements and we therefore consider this element of the strategy is not sound because it is not justified.	The existing evidence base relating to sport and recreation being up dated and expanded.
2029/132	Davidsons Group	<p>There is no objection to establishing the principle of developer contributions through the Core Strategy or the identification of the type of infrastructure anticipated to support the development outlined in the document. Policy 12, however, is not considered to be compliant with the Community Infrastructure Levy (CIL) requirements. Any proposals for pooled contributions, such as would be required to deliver the local infrastructure schedule attached as Appendix 2 to the Core Strategy, need to be CIL compliant as it is intended that the use of planning obligations for such matters will be phased out. To be CIL compliant any charging schedule must be subject to consultation and independent examination and must therefore be contained within a DPD.</p> <p>As it currently stands, the infrastructure schedule is not sufficiently refined or based on robust and credible evidence to enable the provision of infrastructure through developer contributions to be considered as part of the Core Strategy. Furthermore, no appropriate and CIL compliant strategy is outlined within the policy which would address the provision of infrastructure funding. The policy only refers to further guidance being provided in a Developer Contributions SPD. This is unacceptable in CIL terms and it will be necessary for the Council to prepare a separate DPD to cover the issue of developer contributions. Without such a proposal being included in Policy 12, the Core Strategy is not considered to be effective or justified.</p>	<p>The third paragraph ,final sentence should be revised to read</p> <p>“Further guidance will be provided in a Development Contributions DPD”.</p> <p>Paragraph 5.133 should be updated accordingly.</p>
2032/155	Thurnby & Bushby Parish Council	Land drainage for the Leicester Fringe. Concerns regarding flood risk, land drainage, sewerage.	These issues need to be added to the Land Drainage and Infrastructure Schedule.

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3620/291	Lutterworth Town Council	There should not be any extensions to Lutterworth's existing secondary schools if this would mean an increase in the number of pupils that the schools accommodate. The existing number of pupils at the Lutterworth schools should be the absolute maximum and the catchment areas should be tightly drawn around Lutterworth to reduce the travelling distance for pupils. Leicestershire County Council's view must be obtained in the context of longer term plans to restructure secondary education and how the schools would cope with an increased number of pupils. The proposal for a new Lutterworth Primary School is consistent with the concerns expressed within the Community section of the Lutterworth Town Plan 2010.	Leicestershire County Council's advice must be obtained in relation to the number of pupils that the Lutterworth schools can accommodate.
3620/295	Lutterworth Town Council	The identification of both Lutterworth Health Centre and Wycliffe Medical Centre as having good capacity is agreed.	The following should be added: It is essential that the long term viability of Lutterworth's Feilding Palmer Hospital is secured and that provision of inpatient services, palliative care and minor injury units continues.
2005/11	Leicestershire Police	I would say that the explanation to Policy 11 leans to heritage rather than other design matters. I think the infrastructure delivery and policy stance of the plan on this is good. It seems that we are providing a lot more information than other providers in appendix 2 and I do appreciate that there is more to do in partnership on this. I also see that despite what Tym had to say about our access to capital funds, the appendix suggests that, unlike other partners, Police can offer some resourcing to meet future needs. I hope that none of this draws adverse comment or attention and I look to you to keep me posted on this up to the Examination. We would take the line that at the moment all we can do is provide a snap shot of potential future needs and that the annual plan affords the opportunity to refine this over the life of the Core Strategy.	
2055/375	Leicestershire County Council		See comments relating to Policy 13 c). To be read in conjunction with previous comments in respect of Policy 13 and the general principle of development to the North West of the town.
2055/376	Leicestershire County Council	The schedule contains no renewable energy infrastructure references despite the content of the Policy - see the National Infrastructure Plan.	
2055/377	Leicestershire County Council	These sections do not appear to be effective in highlighting the need for managing the waste generated in the development areas. It highlights which Civic Amenity Sites would be impacted by developments in the District, but does not relate this back to Policy 11 in how to achieve the aim of minimising, reusing and recycling waste. There is no acknowledgement that the Civic Amenity Sites may require additional infrastructure that would not otherwise be required but for the developments and how this would be supported.	The Infrastructure Schedule should provide an improved and strengthened link with how the impacts of the developments on the Civic Amenity sites may be mitigated with developer contributions. The statements should also be in line with the comments that are noted generally about Developer Contributions.
2066/433	Davidsons Group Ltd	There is no objection to establishing the principle of developer contributions through the Core Strategy or the identification of the type of infrastructure anticipated to support the development outlined in the document. Policy 12, however, is not considered to be compliant with the Community Infrastructure Levy (CIL) requirements. Any proposals for pooled contributions, such as would be required to deliver the local infrastructure schedule attached as Appendix 2 to the Core Strategy, need to be CIL compliant as it is intended that the use of planning obligations for such matters will be phased out. To be CIL compliant any charging schedule must be subject to consultation and independent examination and must therefore be contained within a DPD. As it currently stands, the infrastructure schedule is not sufficiently refined or based on robust and credible evidence to enable the provision of infrastructure through developer contributions to	The third paragraph, final sentence should be revised to read "Further guidance will be provided in a Development Contributions DPD". Paragraph 5.133 should be updated accordingly.

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		<p>be considered as part of the Core Strategy. Furthermore, no appropriate and CIL compliant strategy is outlined within the policy which would address the provision of infrastructure funding. The policy only refers to further guidance being provided in a Developer Contributions SPD. This is unacceptable in CIL terms and it will be necessary for the Council to prepare a separate DPD to cover the issue of developer contributions. Without such a proposal being included in Policy 12, the Core Strategy is not considered to be effective or justified.</p>	
2018/72	Thurnby and Bushby Society	<p>Appendix 2: Local Infrastructure Plan, page 118: Land Drainage for the Leicester Fringe - Policy 10 Flood Risk (p68) mentions sensitivity of Scraftoft/Thurnby/Bushby to surface water discharge but the Infrastructure Schedule for the Leicester Fringe (p118) does not mention Land Drainage, only Sewerage and Water supply. The same applies to other places.</p> <p>This is contrary to Harborough Sustainable Community Strategic Vision paragraph 2, and contrary to Harborough Core Strategy Strategic Objective 13.</p>	<p>Add Land Drainage to Infrastructure Schedule for the Leicester Fringe and other places</p> <p>Add a note for clarification that the existing balancing pond off Pulford Drive will not prevent flooding downstream in Thurnby because Thurnby Brook is in a deep cutting at the balancing pond location</p>

Appendices 3-7 Representations

Ref ID	Representor	Reasons why considered Sound or Unsound	Suggested change to Core Strategy
2005/9	Leicestershire Police	Other local Core Strategies reference Safer Places, the companion guide to PPS 1 and/or secured by Design, an Association of Chief Police Officers design initiative to support this. You could reference at least the former in your appendix 7.	Appendix 7 should reference companion guide to PPS 1 - Safer Places and ACPO Secured by Design Initiative.
2007/34	English Heritage	<p>The Sustainability Appraisal sets out a number of possible negative impacts of the plan proposals on the historic environment, e.g. development pressures, modernisation and lack of management of conservation areas (page 25). One of English Heritage's concerns is the impact of the significant level of growth proposed for Market Harborough; these could be direct impacts on individual heritage assets or their setting or indirect effects, such as traffic growth. The pressure for change within the town centre will need to be sensitively managed, e.g. the demand for additional car parking, new retail development etc. While the SA acknowledges that the policy does address these issues ((Detailed Assessment Matrix), the impact of growth will need to be carefully monitored.</p> <p>The questions set out on page 63 of the SA are pertinent to the monitoring of these broad impacts on the historic environment: Monitoring is particularly useful in answering the following questions:</p> <ul style="list-style-type: none"> - Were the assessment's predictions of sustainability effects accurate? - Is the Core Spatial Strategy contributing to the achievement of desired sustainability objectives? - Are mitigation measures performing as well as expected? - Are there any unforeseen adverse effects? Are these within acceptable limits, or is remedial action required? <p>It is disappointing therefore that the historic environment is not identified in the table showing the monitoring programme in Appendix E. While the indicators in Appendix 4 Monitoring Framework of the Core Strategy monitor progress with respect to the preparation of a local list and the designation of additional Conservation Areas, the impacts of the implementation of the plan through the SA monitoring need to be addressed. This is likely to be an iterative process as more detailed DPDs or their successors come forward.</p>	That the impacts of the implementation of the Core Strategy on the historic environment are appropriately monitored bearing in mind the questions set out on page 63 of the SA.
2081/492	Bitteswell Parish Council		The Core Strategy makes reference to policies of the Harborough Local Plan that are to be retained, and these are identified in Appendix 3. This approach is firmly supported by this Council. However, for these policies to continue to be effective and retain their standing throughout the balance of the Plan Period they need to rank as equal in all regards with the new policies now proposed. For this reason, and to avoid the requirement for constant reference to the Harborough Local Plan, it is recommended that the retained policies be incorporated as discrete and explicit policies in the Core Strategy. As settlements devoted effort to the preparation of Parish Plans, which were endorsed by the District Council, the absence of any reference to Parish Plans in the Core Strategy is a significant omission.

Overview of categorisation provided on Core Strategy representations received.

Section of Plan	Total Number of Respondents	Total Number of Representations	Nature of representation:			
			Unsound	Sound	No Comment	Not Legally Compliant
Chapter 1: Introduction	1	1	0	0	1	0
Chapter 2: Spatial Portrait	10	12	7	5	0	0
Chapter 3: Vision and Objectives	6	6	1	3	2	0
Policy 1	47	71	46	22	3	2
Policy 2	47	96	77	12	6	2
Policy 3	28	35	23	9	3	0
Policy 4	9	13	10	1	2	1
Policy 5	9	15	6	5	4	0
Policy 6	8	13	8	3	2	1
Policy 7	16	22	15	5	3	1
Policy 8	29	41	16	21	4	0
Policy 9	16	18	8	6	4	9
Policy 10	4	4	2	2	0	0
Policy 11	14	15	6	6	3	1
Policy 12	18	19	12	2	5	0
Policy 13	21	23	17	3	3	0
Policy 14	12	24	16	7	1	1

Policy 15	20	40	20	20	0	1
Policy 16	14	15	10	3	2	2
Policy 17	42	50	31	11	7	3
Multiple Policy Reps	6	7	1	6	0	0
Unspecified	11	14	3	2	9	0
Key Diagram	3	4	4	0	0	0
Appendix 1: Housing Trajectory	3	3	2	0	1	0
Appendix 2: Infrastructure Schedule	10	14	11	2	1	0
Appendix 3-7	3	3	1	1	1	0

** The number of Representations in the above table totals 578. However 5 Representations included a Policy number and an Appendix number, and therefore have been double counted. The actual number of Representations Received was 573.*