



**Harbours Local Plan**

**Addendum to Report 2: Harbours Local Plan: Proposed Submission  
Advice of the Local Planning Executive Advisory Panel**

**August 2017**

## **Addendum to the Local Plan Executive Report 4<sup>th</sup> September 2017.**

1.1 Following the advice given by Local Plan Executive Advisory Panel (LPEAP) on 23<sup>rd</sup> August 2017, an additional addendum to the Local Plan Executive Report has been produced to assist the Executive when considering the Submission Draft Local Plan at the meeting on the 4<sup>th</sup> September 2017.

1.2 This addendum provides additional information to Executive on the following matters arising from LPEAP;

- Minor wording amendments to policies SS1, H2, HC1, GI5, SC1, L1, and to the explanations to H6 and L1 and to Appendix E to the Draft Proposed Submission Local Plan;
- Detailed information regarding Policy BE2 Strategic distribution, the supporting evidence provided by the Magna Park Employment Sensitivity Study and the implications to Policy SS1 The Spatial Strategy;
- Response to the concerns raised by residents on the proposed growth at Magna Park.

### **LPEAP amendments to the Draft Submission Local Plan**

1.3 As a result of comments and discussion raised at LPEAP on 23<sup>rd</sup> August 2017, a number of minor amendments have been proposed to the Draft Proposed Submission Local Plan as published as Appendix A to Executive report Harborough Local Plan: Proposed Submission.

The amendments are as follows:

#### **SS1 The Spatial Strategy**

- 2 a) Insert 'provision of land' as follows:

*a. Housing: provision of land for a minimum of 12,800 dwellings (Use Class C3), including: . . . . .*

#### **H2 Affordable Housing:**

- Minor amendment (as tabled at the LPEAP meeting 23 August 2017) to ensure that the requirement in relation to small development applies to those of 1,000 square metres gross or less, or 0.5 hectares or less (as well as developments of 10 or fewer dwellings), as well as minor wording change 'approximately' to 'about' as follows:

*2. The tenure split for the affordable housing will be as follows:*

*a. aboutapproximately 75% affordable or socially rented; and*

b. ~~about~~approximately about 25% low cost home ownership products; or . .

4. Where small housing developments (of 10 or fewer dwellings, 1,000 square metres gross or less, or 0.5 hectares or less) are proposed within five years of each other on sites that have a spatial relationship (such as a shared access or being located adjacent to each other), or on adjacent sites that are (or have been within the five year period) in the same ownership, affordable housing will be required where a cumulative total of more than 10 dwellings, 1,000 square metres or 0.5 hectares is proposed.

#### H6 Gypsy, Traveller and Travelling Showpeople accommodation:

- Para 5.11.4 Additional sentence at the end of the paragraph to highlight the need for the relevant licences, as follows:

Licenses are a legal requirement for all caravan sites, with licenses required to be obtained from the Council's Environmental Health Team prior to occupation of sites, and for Travelling Showpeople sites a Showman Guild license will also be required.

#### HC1 Heritage and Community Assets:

- Wording amendments to strengthen the policy, as follows:

**1. Development affecting heritage assets and their settings will:**

**a. be appraised in accordance with national policy; and**

**b. be permitted where it sustains~~protects~~, conserves and where appropriate or enhances the significance, character, appearance and setting of the asset, including where possible better revealing the significance of the asset and enabling its interpretation'.**

**2. Development ~~within or affecting a Conservation Area~~ will be permitted refused where the proposal would lead to harm to or the loss of significance of a heritage asset and/or its setting, unless it can be demonstrated that the harm or loss is clearly outweighed by the public ~~Conservation benefits Area Statement and it reflects and respects~~ of the special characteristics that the Statement identifies ~~proposal~~'.**

**3. 'Development ~~that secures the viable and sustainable future of heritage assets at risk of neglect~~ within or affecting a Conservation Area will be permitted where ~~such development~~ it preserves ~~reflects or and~~ and respects the significance special characteristics of the**

~~Conservation asset Area, the including i Council local design accept and an amount of enabling development if; and materials'~~

**4. Development that secures the viable and sustainable future of heritage assets at risk of neglect or loss will be permitted where such development preserves or enhances the significance of the heritage asset; and**

~~**this is demonstrably necessary to secure the future of the asset;**~~

~~**b.it does not result in harm to the asset or its setting;**~~

~~**c. the public benefit outweighs the harm caused; and**~~

~~**d. no other funding is available**~~

#### **GI5 Biodiversity and Geodiversity:**

- 2 a) ii) proposed amendment to ensure conformity with the NPPF to read: **irreplaceable habitats , including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss**

#### **SC1 Scraftoft North Strategic Development Area:**

- 3G) Amendment to the trigger point for the delivery of community facilities, from 700 dwellings to 500 dwellings, as follows:

***a neighbourhood centre as a social and retail hub for the new community to be provided before the completion of 700 500 dwellings***

- 3p) Minor wording amendments to mirror that for L1:

***p. a parking strategy including cycle parking, and servicing for each development parcel to determine the location of parked cars to ensure that they can be accommodated without dominating the built environment (and in accordance with Leicestershire County Council 6Cs design guidance;***

#### **L1 East of Lutterworth Strategic Development Area:**

- Para 15.2.16 Additional wording in the final sentence to explain that the spine road will be constructed in its entirety before the completion of 1250 dwellings, as follows:

**The spine road will be constructed in its entirety, including the bridge over the motorway before the completion of 1250 dwellings, projected to**

[be in 2029, unless otherwise agreed by the Council in response to currently unforeseen circumstances.](#)

## **Appendix E:**

- Objective 14: Neighbourhood Planning – the list of Local Plan policies which Neighbourhood Plans should be in conformity with is reduced, with the proposed deletion of BE4 Bruntingthorpe Proving Ground and BE5 Leicester Airport, Stoughton, as follows:

**Neighbourhood plan policies should be in general conformity with all Local Plan policies, apart from:**

**GD6: Areas of Separation,**

**GD9: Minerals Safeguarding Areas,**

**H3: Rural exception sites,**

**RT3: Shopfronts and advertisements,**

**HC2: Community facilities,**

**HC3: Public houses, post offices and village shops,**

**GI3: Cemeteries,**

**GI4: Local Green Space,**

**CC4: Sustainable drainage.**

## **Further amendment to address late comments raised through duty to cooperate engagement with stakeholders**

Further amendments are proposed to address late comments raised by Historic England during recent duty to cooperate discussions.

### **L1: East of Lutterworth SDA**

- **New criteria relating to nearby heritage assets and their settings, to address comments raised through the Duty to Cooperate, as follows:**

[3. j iv. measures to minimise potential visual impact on nearby heritage assets and their setting, in accordance with Policy HC1;](#)

[3 u ii. nearby heritage assets and their settings in accordance with a methodology to be agreed by Historic England before the development commences;](#)

- **Para 15.2.26 Additional sentence at the end of the para, as follows:**

***This will also protect views of St Leonards Church (Misterton, Grade II\*) and Misterton Bowl Barrow (Scheduled Monument) within their settings and provide an opportunity to enhance access to and public enjoyment of such views.***

## **Policy BE2 Strategic distribution**

1.4 The Local Plan Executive Advisory Panel requested that detailed information be provided to the Executive when they considered the Draft Submission Local Plan to enable them to consider the implications and outcomes of the alternative growth scenarios for Magna Park tested through the Magna Park Employment Sensitivity Study.

1.5 By way of background, the Leicester and Leicestershire Strategic Distribution Sector Study (SDSS 2014, 2016) concluded that the key to maintaining the East Midlands and Leicestershire's competitive advantage in the logistics sector is the continued development of new commercially attractive sites. The study forecast that a total gross new-build floor-space and land requirements for the Housing Market Area was predicted as 1,445,000sqm which equates to 361ha of required land. Taking the study recommendation and conclusions together, when preparing Local Plan and policies, the evidence states that the demand forecast figures should be viewed as minimum requirements going forward, not 'targets' or maximum levels of provision not to be exceeded.

1.6 The minimum floor space and land requirements are not disaggregated by individual districts. The Leicester and Leicestershire Housing and Economic Development Needs Assessment HEDNA (2017) assumes that the minimum requirement set out in the SDSS study will be met and forecasts the housing requirement arising from it, in addition to the other components of population growth. Evidence indicates that completions and commitments in the District (at March 2017) and across the HMA (to June 2016) are sufficient to meet the minimum for non rail-served sites need without further allocation, however, market demand for sites in this District remains high. The SDSS, and success of Magna Park and market demand for further development, suggests that there is a case for the Harborough District to continue contributing towards meeting the future needs of the sector. Given that the available proportionate evidence does not set out an upper limit for strategic distribution in the HMA the Council, through the Local Plan process, must positively plan for an appropriate level of strategic distribution development.

1.7 In May 2017 a Duty to Cooperate Workshop with neighbouring authorities highlighted that further work was required to support the Draft Proposed Submission Local Plan and Policy BE2 relating to strategic distribution. There was a clear need

to consider whether any proposed increase in strategic distribution development above that assumed within the HEDNA (2017) would have any significant impact on housing and employment requirements and their distribution. In particular the need to place an upper limit on potential strategic distribution development to address concerns regarding impacts on housing and employment from other Local Authorities. This would ensure that the relationship between the level of employment growth being promoted within the District and the proposed level of housing growth was balanced and sound. This must be clearly evidenced to ensure that a requirement of the HEDNA is met and any resulting Duty to Cooperate matters could be addressed.

1.8 A revised Policy BE2 was presented to Local Plan Executive Advisory Panel on the 19th June 2017. This aimed to ensure that the provision for strategic distribution in Harborough District is soundly and positively managed by the Local Plan to ensure that housing and employment development are in balance, thus achieving sustainable development objectives. The policy identified that a '*xx square metre*' quantum of strategic employment land near to Magna Park, was required in order that such a balance could be achieved. However, at that time it was not possible to quantify the level of growth in the absence of further evidence.

1.9 The Magna Park Employment Sensitivity Study was therefore undertaken during July and August to understand the housing and employment implications of levels of strategic distribution growth in the District above that assumed for within the HEDNA 2017 and to provide evidence to support the Draft Proposed Submission Local Plan. In the absence of evidence of the upper limit of likely future demand, the Study tested a number of reasonable alternatives for different scales and locations of growth, using market evidence from applications and site submissions as a basis.

1.10 A report on the emerging conclusions of the Employment Sensitivity Study was presented to Local Plan Executive Advisory Panel on the 24th July 2017. This report included a revised Policy BE2: Strategic Distribution, informed by the results of the Study, identifying the proposed quantum of strategic distribution for the plan period of 700,000 sq m. gross of additional strategic distribution floorspace.

1.11 Following the Panel meeting on 24 July 2017, further discussion with Duty to Cooperate partners has taken place. The outcome of this further discussion has been shared with Members of the LPEAP and used to finalise advice to Executive concerning Policy BE2 and to meet Draft Submission Local Plan deadlines for adoption in 2018.

1.12 As set out in the minutes to the meeting, the Panel stated that although they had not "signed up" to everything in the Draft Submission Local Plan they were satisfied to advise the Executive to approve the document for consultation, with the additional recommendation that the Executive should consider the options for Magna Park (Policy BE2).

## **Magna Park Employment Sensitivity Study**

1.13 The Magna Park Employment Sensitivity Study considers three different levels of Strategic Distribution (B8) growth scenario at and adjoining Magna Park.

- Scenario A: 100,000 square metres
- Scenario B: 400,000 square metres
- Scenario C: 700,000 square metres

1.14 The scenarios tested are based on previous options and SA work undertaken at the 'Options' stage of plan preparation (Autumn 2015) and reflect the most recent evidence on forecast demand provided by the SDSS (2016).

1.15 The scenarios have been informed by the Strategic Employment Land Availability Assessment (March 2017) and the planning applications recently received by the Council. One of these planning applications (for 100,000sq.m) has been considered by the Planning Committee and they resolved to grant planning permission subject to a suitable Section 106 Agreement. Two further planning applications are still to be considered by the Local Planning Authority; planning application number, 15/00866/OUT for an Extension to the existing Magna Park: this is for circa 330,000 sq. metres. The second, planning application number 15/01531/OUT, on a site adjoining Magna Park: this is for circa 280,000 sq metres. It is important to acknowledge that the scenarios do not provide evidence on how the planning applications should be determined. The scenarios assess the housing impact of the alternative growth scenarios for the Local Plan to consider, thus aligning housing and employment.

1.16 In addition to floorspace, the Magna Park Employment Sensitivity Study also considers the impact of achieving more sustainable commuting patterns, thus increasing the level of self containment in the District as part of the Local Plan's wider aims and objectives as follows:

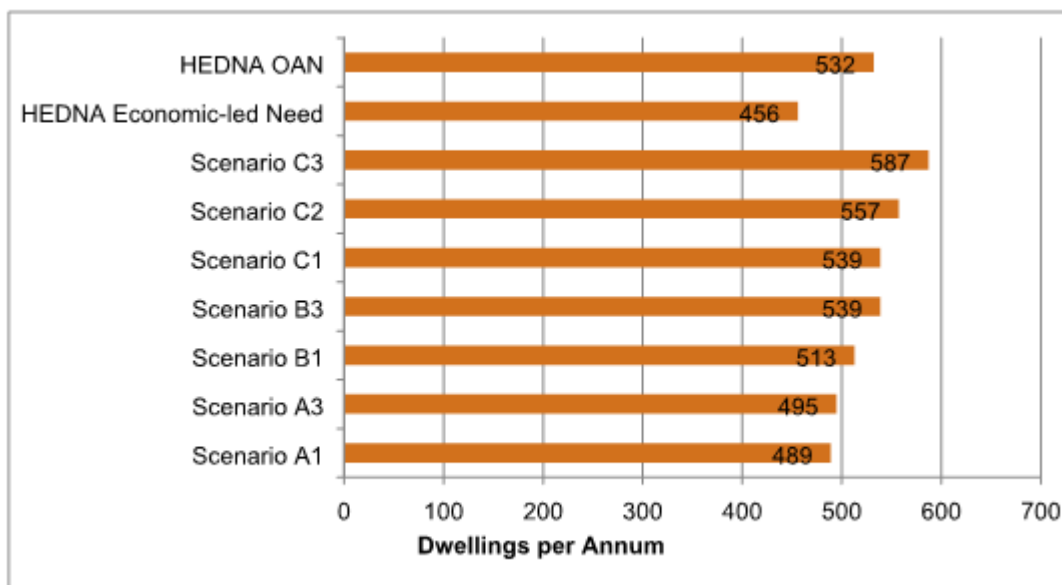
- Scenario 1: Census based commuting assumptions 18.9% (ie no change to current levels)
- Scenario 2: Proportion of Magna Park workers living in Harborough increased to 25%
- Scenario 3: Proportion of Magna Park workers living in Harborough increased to 35%

1.17 The purpose of the study is to ascertain the job growth and housing need impacts of each scenario for Harborough, our Leicester and Leicestershire partner authorities and authorities in other counties, namely Rugby, Daventry, Nuneaton & Bedworth, Coventry and North Warwickshire. These are areas from which a high level of the Magna Park workforce reside and travel from for work.



1.18 The study tests the impact on future housing requirements of the alternative levels of floorspace set out in Scenarios A-C and the potential levels of self-containment in Scenarios 1-3 in to inform the upper limit of strategic distribution growth provided for within the Local Plan. Figure 1, below, extracted from the report (page 19) illustrates the impact for Harborough District.

**Figure 1: Housing need Scenarios for Harborough District, dpa 2011-31**



1.19 In appraising the results of the Magna Park Employment Sensitivity Study, scenario C2 700,000 sq m with a level of 25% self containment presents the most reasonable option to be taken forward within the Draft Proposed Submission Local Plan.

1.20 The housing requirement of 557 dwelling per annum does not alter the OAN of 532, but would result in a housing requirement of an additional 25 dwellings per annum. This housing requirement can be accommodated within the total Local Plan housing land provision for 12,800 dwellings (equivalent to 640 dwellings per annum).

1.21 Scenario C2 presents no significant impacts upon the wider objectives of the Local Plan and seeks to increase the levels of self containment to 25%. This represents an increase of 6.4% by 2031 and would be achieved through the requirement within criteria 2c and 2d of the proposed Local Plan Policy BE2.

1.22 Scenario C2 is considered to be the maximum floorspace which can be accommodated without significant impacts on housing and employment within the district and other Local authorities. In the absence of other evidence relating to the upper level and distribution of strategic distribution need across the HMA and region

this is considered to be the most appropriate and proportionate evidence on which to base a maximum limit.

1.23 Consideration was given to testing a higher level of development but based on the initial findings of the ESS it was considered that such an option would have unacceptable additional housing requirements and impacts on the District and other authorities.

1.24 Reasonable alternatives ranging from low (100,000sq.m) to high (700,000sq.m.) growth, tested through the Sustainability Appraisal of the Local Plan and using a proportionate evidence base have been considered. In the context of the NPPF a criteria based policy has been proposed. The revised Policy BE2 allows for an upper limit of strategic distribution development for the District. This allows for a level of growth which has considered the interrelationship with housing needs, and plans positively.

1.25 It is important to note that the revised BE2 does not allocate 700,000 sq m of floorspace. It sets the upper limit of floorspace. Any proposed strategic distribution development should not exceed this (cumulatively) floorspace limit and also meet a series of criteria, relating to environmental and highway impacts, and potential impacts on strategic rail based freight

1.26 In conclusion, the evidence from the Employment Sensitivity Study demonstrates that the strategic distribution upper limit level of 700,000sq m can be accommodated at or adjoining Magna Park in terms of supporting infrastructure, housing provision and commuting patterns. In addition an objective runs through the Local Plan to further enhance the sustainability of commuting patterns in the future during the plan period. In the light of this Policy BE2, as drafted, delivers a sound approach by setting the upper limit for strategic distribution at or adjoining Magna Park at 700,000sq m. Therefore, it is considered this strategic distribution upper limit of 700,000sq m at or adjoining Magna Park should be included in the Local Plan to ensure that the Plan is sufficiently robust to be found sound by the independent inspector.

### **Policy SS1 The Spatial Strategy**

1.28 The amount of Strategic Distribution sector growth proposed within Local plan policy BE2 takes account of the inter relationship with housing needs. The conclusion from the Magna Park Employment Sensitivity Study is that;

- At the Leicester and Leicestershire level, the HEDNA's objectively assessed housing needs (OAN) conclusions remain true and robust both for the Leicester and Leicester HMA and the OAN of 532 dwellings per annum for Harborough District remains the baseline housing need to 2031;

- Any growth at Magna Park would not increase the OAN for the Harborough District but would lead to a small increase in housing requirement to 557 for the District (on which the 5 year supply would in future be judged);
- However, the total amount of housing provision in the Local Plan (640 p.a. and 12,800 in total) is sufficient to cover this increase.

## **Key outcomes**

1.29 The Draft Proposed Submission Local Plan contains the following:

- Strategic Priority SP3: Meeting regional and national demand for strategic distribution (logistics) development,
- Key Issue 3: Facilitating growth in the economy (Including contributing significantly to wider sub-regional requirements for road-based strategic distribution, and reducing the dependence of Harborough's residents on commuting); and
- Local Plan Objective 2 (Employment): Policy BE2 supports this objective and furthermore the Employment Sensitivity Study identifies the impacts on Leicester and Leicestershire HMA (Housing Market Area) and other non HMA authorities that are adjacent to Harborough.
- Policy BE2 aims to build on all the elements mentioned above to protect the existing Magna Park and set criteria, including a limit to development, for further development in the vicinity.

1.30 Ensuring that the need for Strategic Distribution in the Harborough District is soundly and positively managed will also enable certainty to be provided concerning other strategic distribution sites within the Leicester and Leicestershire FEMA (Functional Economic Market Area) and other non- FEMA authorities that are adjacent to the Harborough District. This will contribute to ensuring that wider economic objectives across the FEMA are not undermined as well as ensuring the legal tests associated with the statutory of the Duty to Cooperate are fully met.

## **Response to the concerns raised on the proposed growth at Magna Park.**

1.31 Appendix 1 provides a response to some of the questions which have been submitted to the Strategic Planning Team regarding Policy BE2 and Magna Park and raised at Local Plan Executive Advisory Panel on the 23<sup>rd</sup> August. Due to the number of emails received the questions have been summarised and responses to some of the key concerns raised.

## **Appendix 1**

### **Strategic Distribution (Policy BE2) – Response to the concerns raised by residents on the proposed growth at Magna Park.**

#### *1. Why do we need 10,000 low paid, low skill jobs in the area given the high levels of employment?*

Nationally and within the District the level of unemployment is currently low. The Local Plan runs to 2031 which covers and extends beyond a typical full economic cycle, as such fluctuations in the level of unemployment are likely during this time period, accompanied by ongoing population growth within the District, HMA and wider surrounding area.

Magna Park is already one of the largest employment centres in the county. Evidence suggests it will remain a competitive location for the sector. It is reasonable therefore to assume that any development will continue to serve the jobs' needs of the District and HMA and that a proportion of the workforce at Magna Park will be drawn from the wider labour market.

The proposed growth at Magna Park of up to 700,000 sq m within Policy BE2 in the Local Plan is estimated to create an additional 9,200 direct jobs. Due to the multiplier effect and the sub-regional nature of this effect, this is estimated to create 9,700 net jobs (both direct and in-direct). for Harborough and 4,300 for residents of the wider Leicester & Leicestershire area up to 2031.

Census data suggests that around 19% of jobs currently provided at Magna Park are filled by Harborough residents, a further 46% by residents from elsewhere in Leicestershire and the remainder by labour travelling in from adjoining areas, due in large part to the accessible nature of the location.

Previous evidence which supports the Local Plan have explored employment and skills within the sector, and examined common misconceptions. Although operatives and elementary positions account for a higher proportion of jobs across the sector, compared to the whole economy, the sector does provide jobs across all occupational groupings appropriate to skill levels across the qualification spectrum.

#### *2. How will 10,000 similar jobs (not of right quality) prevent out-commuting for work?*

Not all employees will commute into the area. The local plan approach includes additional housing needed to support growth at Magna Park, aligning the housing and economic strategy. This level of housing land provision is sufficient to allow for a potential improvement in the level of self-containment (from 19% to 25%). Self-containment can be altered by changes to the number of people travelling both into and out of the district for work.

Providing more jobs and housing, including in locations accessible to Magna Park, cannot in itself prevent commuting but over time it provides housing choices which may enable workers at Magna Park to become District residents and to enable residents who currently commute out to Rugby, Daventry or Leicester to have access to more job opportunities within the District.

Policy BE2.2 criteria c. and d. state the requirement for proposals to increase employment for local residents and to include measures to increase the proportion of the workforce commuting from locations within Harborough.

#### *3. How will the jobs created at Magna Park satisfy the need to create more jobs for higher skilled residents?*

Harborough residents are relatively highly skilled within the wider Functional Economic Market Area

(FEMA.) Growth at Magna Park is only part of the provisions of the local plan for business and employment and will create jobs across the skill range.

Policy BE1 and associated place based policies make allocations for a further 59ha of general employment land across the breadth of B class uses (office, industrial, non-strategic B8) and policy BE3 seeks to safeguard existing employment areas which in combination provide a substantial number of jobs.

*4. How will the increased volume of in-commuting made necessary by the creation of these jobs help to improve air quality?*

The sustainability effects of the Local Plan are assessed in the accompanying Sustainability Report (SA) to the Local Plan. Air quality is one of a number of factors considered under the 'Health & Well-being' topic.

Policy BE2 is recorded as having a minor positive effect in respect of Health and Wellbeing, which comprises air quality and other factors.

The development management process assesses air quality issues including the cumulative impact and, where required, will suggest mitigation measures for development proposals.

The Local Plan also includes an objective to increase sustainable commuting patterns which should have a positive effect on air pollution levels.

*5. How would expanding Magna Park support the broad aims of the Local Plan?*

Policy BE2, together with the other Business and Employment policies will contribute towards meeting strategic priority 3 (meeting national and regional demand for strategic distribution, logistics, development), and objective 2 of the Local Plan by strengthening the economic base and planning positively for an expanding sector (as required by the NPPF).

Policy BE2 allows the site to adapt to meet the changing needs of the sector, renew when buildings become obsolete and to maintain competitiveness and safeguard as well as create new jobs. Growth supports a reduction in the need for out-commuting by providing a range of jobs.

Growth at Magna Park also supports the delivery of LP objectives 3 (Location of development), 6 (Natural Environment) and 10 (Transport) in the context of the plan as a whole.

*6. How will extra commuting into the area affect congestion, traffic and HGV parking?*

The transport impacts of the local plan have been assessed, including policy BE2. The predicted effects of development in terms of Resource Use (including greenhouse gas emissions) are considered by the accompanying SA report.

Policy BE2.2 criterion d and e. set out requirements in respect of traffic congestion and access from within the District. The Local Plan, read as a whole, also contains general development and infrastructure policies to guide development, against which development proposals will be considered.

The SA assesses the effects of the plan as a whole on resource use, which includes consideration of energy efficiency and carbon emissions, predicting a significant / moderate positive effect. Policy BE2.2 criterion e. specifically covers the nearby strategic and local road network, particularly the A5, whether within Harborough District or outside. The development management process

assesses transport issues including the cumulative impact and, where required, will suggest mitigation measures.

The wider infrastructure policies of the local plan encourage major development proposals to provide sufficient infrastructure capacity to support and meet all the requirements arising from it, including servicing and parking arrangements.

**7. The site is not at or near a rail-head, which is the government preferred means of transporting goods, so why is development proposed?**

National policy supports a modal shift for freight traffic towards rail based distribution where appropriate. It also acknowledges that rail-served and road based distribution compliment each other.

The Strategic Distribution Sector Study (2014) takes account of national policy and provides evidence of future land requirements for Leicester and Leicestershire which is split between rail-served and non rail-served provision. Key Areas of Opportunity (KAofO) are identified by the study, which are broad areas where individual sites commercially attractive to the sector are likely to be located. Based on an assessment of infrastructure (current & planned) the KAofO impacting Harborough District is identified for non rail-served provision only.

Rail-served provision to meet future need is expected to be made elsewhere in the Functional Economic Market Area (FEMA). Policy BE2.2 criteria b. is included to ensure that the any additional development has no adverse effect on the delivery of existing or further Strategic Rail Freight Interchange (SRFI) within or serving the HMA and neighbouring authorities.

**8. What impact will additional development have on rural amenity / landscape and wildlife?**

The sustainability effects of the local plan are assessed in the accompanying SA report. Bio-diversity and amenity factors are two of a number of factors considered under the 'Natural Environment' and 'Health & Well-being' topics. A summary of the appraisal of options for strategic distribution is provided in chapter 18, based on detail contained in Appendix G of the same report.

Proposals for additional development including any potential impact upon landscape and townscape character will be considered as part of the development management process against the provisions and policies of the plan, read as a whole.

**9. Policy BE2 allows for additional development (of up to 700,000 sq.m.) which is equivalent to both the DB Symmetry application (15/00865OUT of 279,000sq.m) and the IDI Gazeley application (15/01531/OUT of 433,000 sq. m.). Are we to assume that both these proposals are to be accepted should this new plan go through?**

Policy BE2 provides for additional development up to 700,000sq.m. and does not prejudice the separate consideration of pending planning application through the development management process.

The applications will be assessed on their merits, taking account of material considerations, and in accordance with the Development Plan at the time of determination.

**10. How will companies be able to recruit to vacancies, in competition with expansion at DIRFT / other similar developments nearby?**

Operators within the sector are responsible for recruiting to vacancies based on business decisions. However, people focussed actions also form part of the LLEP Logistics & Distribution Sector Growth

Plan (June 2015) to support sector growth.

Policy BE2.2 criterion c seeks to encourage an increase in employment opportunities for local residents, including training and apprenticeships. An Employment and Training strategy will be required for each development proposal to demonstrate how the criteria will be met.

*11. What are the likely effects of additional development on noise pollution and are mitigation measures effective?*

Future proposals including any potential impact upon noise pollution will be assessed as part of the development management process against the provisions and policies of the plan, read as a whole. Where necessary mitigation measures will be suggested.

*12. How can Policy BE2 be proposed when it appears contrary to some local plan objectives, specifically objectives 3 (Location of development); 6 (Natural Environment) and 7 (Historic Environment) that are designed to protect local environment and heritage, and other plan policies?*

The objectives of the Local Plan are the guiding principles for the policies set out in the plan. The policies of the Local Plan should be read as a whole and in combination they represent a reasonable and sustainable spatial strategy for development to 2031, which is considered sound.

The accompanying Proposed Submission Sustainability Appraisal report identifies, describes and evaluates the sustainability effects of the plan in accordance with the statutory SA/SEA regulations. It considers those issues 'scoped in' at the initial scoping stage of the SA process, under 6 sustainability topics; Natural Environment, Built and Natural Heritage, Health and Wellbeing, Resilience (to Climate Change), Housing and Economy, and Resource Use.

A summary of the cumulative effects of the plan are presented in section 21 of the SA report, which will be published alongside the proposed submission local plan.

*13. The OAN appears to have changed to from 532dpa to 557dwpa to accommodate policy BE2, why?*

Paragraph 4.1 to 4.10 of the report to the meeting of Executive on 4 September 2017, entitled 'Harborough Local Plan: Proposed Submission' explains the background to the housing numbers. It sets out the difference between the OAN, housing requirement and housing provision. The report explains that the OAN of 532 dwellings per annum was noted by Executive at its meeting on 15 May 2017.

It explains that the housing land provision of a total 12,800 dwellings across the plan period (2011 to 2031) was recommended to Council by Executive at its meeting on 15 May 2017.

It explains that the housing requirement of 557 dpa was considered by the Local Planning Executive Advisory Panel at its meeting on 24 July 2017 in a report entitled 'Harborough District Local Plan: Draft Proposed Submission –Employment Sensitivity'. The Panel noted that the Objectively Assessed Need (OAN) has not changed, although the housing requirement, to be included in the Local Plan, has been increased and the figure being worked to was now 557. The housing requirement reflects the proposed changes to policy BE2, but does not change the proposed housing land provision.

*14. In line with the duty to cooperate, which other authorities have been consulted on their employment land developments and where is the evidence of any consultation with them?*

Authorities within the Leicester and Leicestershire HMA have been consulted in addition to other

adjoining authorities including; Rugby District Council, Daventry District Council, Coventry City Council, Kettering District Council, Corby District Council, North Northants JPU and West Northants JPU.

Detailed information will be provided in the Duty to Cooperate Statement which will be presented to the Local Plan Executive Advisory Panel on the 11<sup>th</sup> September.