

Appendix 9 to Lubenham Neighbourhood Plan 2015

Lubenham Neighbourhood Plan

Comments received from 6 week consultation and changes implemented



1. Comments received from 6 week consultation and Changes Implemented

Neighbourhood Plan Responses to PC 6 week consultation						
	Name of respondent	Issue Raised /Policy number	Detail	Comments	Proposed action	Agreed change to Neighbourhood Plan
1	P Shelton LE16 9TD	Typing error and omission in Conservation Area Character statement	Rear of War Memorial has 2 mature lime trees as well as 2 mature sycamores. Final paragraph has words 'The Road has' that appear to be a typing error.	This is a copy of an HDC document used for information purposes as an appendix to the Neighbourhood Plan, it is not a part of the text prepared for the Neighbourhood Plan and therefore no action can be taken by LPC except to inform HDC.	Inform HDC of the details so that they can amend their document Note amendment on appendix to Neighbourhood Plan	Noted amendment on appendix and on this spreadsheet
2	K Nicholls (by email)	The plan is very, very good,	Every aspect has been covered and 36 pages must have taken you and your team months of really hard work at no gain financially for yourselves. I for one appreciate the effort that has gone into it and have no concerns other than the increase in traffic, we in Lubenham are in your good hands.		None	No action needed

3	J & J Smith (by email)	Shocked to find the field behind Barleycroft (map page 30) is developable from six years onwards.	On further comparison of the map on page 17 the field is not down for development in 6-10 years and is listed as simply for assessment. The table on P 19 also causes confusion - Core Strategy is for 72 dwellings which is covered by preference orders 1, 3 and 4. when you add in preferences 2 and 5 a massive 121 dwellings would be planned . Why is Barleycroft field down for development in 6 years?	Response sent to answer questions posed. The map page 30 is a copy of the HDC SHLAA map LPC has already raised the matter with HDC and Highways of differences and inconsistencies in the assessments for sites between the 2014 assessments and the 2015 assessments. Meeting offered to discuss concerns. Await further response from respondent	More details at 7 below	Action taken following supply of further information from respondents see queries and conclusions at 24 – 29 below
4	Townley (by email)	I have just seen the plans if this goes ahead then I will move from the area . May I enquire how many councillors will have this new "estate" in their back gardens ? and I do need a reply to that question please.	This must be stopped before we become just one huge ghetto. We do not even have enough work for the people living here now let alone all this that you plan. so the area will not benefit at all	Unclear where this respondent comes from email sent requesting more information and offering meeting to discuss concerns. Await further response from respondent	No further response received. We believe this may relate to SDA developments which are already passed.	No action possible
5	Environment Agency - Geoff Platts	LNP02	Add to wording "not interfering with its ability to function as a flood flow route and floodplain.		Agree	Agree - wording added

6	Environment Agency - Geoff Platts	LNP04	Suggest wording "protect and enhance " natural etc		Agree	Agree words 'protect and enhance' added to policy
7	Environment Agency - Geoff Platts	LNP05	<p>Part of site ALN/HSG/12 according to the Environment Agency Flood Zone Maps lies within an area of flood risk and as such, and in accordance with NNPF is subject to the sequential test. The sequential test aim is to develop on sites that are not at flood risk before developing sites that are at flood risk. Clearly there are other sites that are not at flood risk that could be developed prior to this one so it may be difficult for this site to pass the test. I understand that Harborough BC is currently reviewing their Strategic Flood Risk Assessment,- it may be prudent to see what flood risk is given to this site in their document.- If the site is shown to be at flood risk and you continue to promote this site for development, then you should consider whether your plan is sound.</p>	<p>This site is already well into the planning stage and has received less resistance during NDP consultations than other sites. Developers have already addressed the issue of the potential flood risk zone, have reduced the site numbers from 32 to 28 and moved the development towards the north of the site beyond the flood zone.</p> <p>Site is likely to be developed before NDP is 'made' as application is already passed.</p> <p>Environment Agency response to application acknowledges the site specific flood risk assessment recommending that the finished floor level of new houses is above a certain level (that level is determined by their calculations in terms of flood events plus a</p>	refer also to HDC comments re site excluding flood zone	<p>Site A/LN/HSG/12 – Land south of Main Street. Application for development has been submitted to HDC. Site has been reduced in size to exclude the southern part of the site which previously abutted a flood zone. A Flood Risk assessment has been carried out with the following findings</p> <p>The built area within the development site lies within Zone 1 of the Environment Agency Flood Map (version 2.8.2), being the zone with risk of 1 in 1,000 year (0.1% AEP) or less for tidal/river flooding. The SFRA completed in 2009 estimates that the built area of the site is also within flood zone 1, low risk. The Environment Agency flood mapping information also confirms that the built part of the site is within Zone 1, low risk.</p>

				<p>margin for climate change).</p> <p>The application was passed by HDC at a planning meeting on February 2nd 2016. It is therefore considered that the exceptions test does not apply.</p>		<p>However a general policy change has been made to address the EA's concerns to apply to all sites with additional criterion (xii) added to read as follows:</p> <p><i>(xii) All proposed developments shall be designed to avoid flood risk to new homes as determined by appropriate flood risk assessments which shall accompany planning applications.</i></p> <p>HDC will be updating their SFRA, but are awaiting new modelling work from the EA, which we understand is not yet completed and therefore cannot be used for the purposes of the Neighbourhood Plan.</p>
8	Environment Agency - Geoff Platts	LNP06	Would prefer to see this site developed in preference to Land South of Main Street.		South of Main Street likely to be decided before plan is finished and see above.	<p>EA comments not in accordance with community preferences also see above. Site A/LN/HSG/12 has now been granted outline permission.</p> <p>General policy change made to address the EA's concerns to apply to all sites with</p>

						<p>additional criterion (xii) added to read as follows:</p> <p><i>(xii) All proposed developments shall be designed to avoid flood risk to new homes as determined by appropriate flood risk assessments which shall accompany planning applications. Also see above.</i></p>
9	Environment Agency - Geoff Platts	LNP10	I would suggest that you include another point which says " where the buildings are not in an area of flood risk"		Suggest agree	Noted - however the SDA is not in an area of flood risk. No changes necessary. General policy change made to cover all sites see (xii) above
10	Environment Agency - Geoff Platts	LNP22	Can't see how you can have a policy which just agrees to planning conditions which have been included on a grant of planning approval.		Modify wording appropriately to allow for further controls.	Noted - wording of policy revised to "Policy LNP22 The provision of an agricultural showground is supported if planning conditions mitigating the impacts of the development and controlling its use are imposed at application stage."
11	Environment Agency - Geoff Platts	LNP24	Would suggest including at point 4 "water efficient appliances"		Modify wording In Neighbourhood Plan so this is logged for HDC to include this generally across the district. Water efficiency is dealt with by the	Suggest that HDC are encouraged to consider this across the district rather than limit it to Lubenham NP area only.

					Building Regs. (Part G) which specify 125 litres per person per day unless a lower limit of 110 per day is specified by planning permission.	
12	Stewart Prentice Anglian Water	It is noted that the Parish Council has identified three housing allocation sites following public consultation. In relation to the proposed sites we would make the following comments:	Land north of Laughton Road (9 dwellings) Anglian Water has no objection to the principle of development on this site.			No change needed
13	Stewart Prentice Anglian Water	LNP05 Housing Allocation sites	Land north of Foxtan Road (27 dwellings) Anglian Water has no objection to the principle of development on this site. However it is important to note that the improvements to the existing foul sewerage network are expected to enable the development of this site. The applicant for this site will need to demonstrate that capacity within the foul sewerage network can be made available as part of the planning application process.		add comment to ensure that applicants adhere to this.	The applicant for this site will need to demonstrate that capacity within the foul sewerage network can be made available as part of the planning application process.

14	Stewart Prentice Anglian Water	LNP05	Land south of Main Street (36 dwellings) Anglian Water has no objection to the principle of development on this site. However it is important to note that the improvements to the existing foul sewerage network are expected to enable the development of this site. The applicant for this site will need to demonstrate that capacity within the foul sewerage network can be made available as part of the planning application process.		add comment to ensure that applicants adhere to this	Modified wording to take this into account additional criterion added as follows (xiii) All proposed developments shall make adequate provision for foul water drainage and undertake improvements as necessary.
15	Stewart Prentice Anglian Water	LNP06 Housing Reserve Site	Land south of Laughton Road. It is noted that the land south of Laughton Road has been identified as a reserve housing allocation site. Anglian Water has no objection to the principle of development on this site. However it is important to note that the improvements to the existing foul sewerage network are expected to enable the development of this site. The applicant for this site will be need to demonstrate that capacity within the foul sewerage network can be made available as part of the planning application process		add comment to ensure that applicants adhere to this	Modified wording to take this into account additional criterion added as follows (xiii) All proposed developments shall make adequate provision for foul water drainage and undertake improvements as necessary.

16	Stewart Prentice Anglian Water	LNP24 :Energy and Water Efficiency	Anglian Water welcomes the reference made to new development within Lubenham Parish incorporating sustainable drainage methods.		no action required	No action required
17	LCC Nik Green Policy Officer	Leicestershire County Council are supportive of the Neighbourhood plan process and are pleased to be consulted on Lubenham's Neighbourhood Plan.	Transport - We are engaged, as the highway authority, in dialogue with local residents about traffic related issues and will continue this as the plan develops.			Noted that Lubenham is a less sustainable community with only 2 hourly buses
18	LCC Highways	SHLAA sites	We will continue to work with the planning authority in assessing specific development sites from a highway perspective in the area, with reference to the Neighbourhood Plan.			No change needed.
19	LCC Nik Green Policy Officer	Transport	The draft Neighbourhood Plan does not comment on public transport provision or the risks associated with a reduced bus service. It is suggested that the plan considers the current public transport provision (i.e. low frequency (less than two-hourly) service with links to Lutterworth and Harborough) and risks associated with any possible	Discussed with LCC officer Response 'If existing bus services are withdrawn, consider how the local community could provide locally delivered transport services through either 1.volunteers or minibus purchase from parish funds/possible developer	not considered possible to address this through Plan policies – although possible use of 106 contributions.	Inadequate bus service highlights the need for footways/cycleways between the settlements especially Bramfield. Add comment

			future service reduction.	Contributions and or local business sponsors. 2. Use parish funds to buy in any additional local services identified over and above existing provision.		
20	LCC Nik Green Polcy Officer		Flooding Authority no comments received			No change needed
21	LCC Nik Green Polcy Officer		Planning No comments received			No change needed
22	LCC Nik Green Polcy Officer		Property - No comments received			No change needed
23	LCC Nik Green Polcy Officer		Mineral & Waste Planning – No comments received			No change needed
24	J & J Smith LE16 9TD	Disagrees with policies LNP 08, 12 Agrees only slightly with policies 04, 05,06,07,13 and policies 16 - 24	All new housing policies 02,03,04,05,07,08,09 and 10. Objections revolve around inconsistencies in maps P17 (5.6) and P 30 (6maps) and tables on p 18 (5.7) and P20 (5.20)	See clarification below		Amendments to reflect and clarify - new numbering with notes in appendices for explanation so that it links back to consultation – Maps revised
25	J & J Smith LE16 9TD	As above	The priority list seeks to provide 72 dwellings increasing to a possible 85. The priorities 1 - 4 are different in the table to the extracted list (land south of Main Street is 5th in the table and 4th	The 2015 SHLAA map shows Barleycroft as developable within the time frame but it wasn't one of the first 4 chosen sites at consultation	Suggest using updated map to replace map 3.	Amendments to reflect and clarify - new numbering with notes in appendices for explanation so that it links back to consultation – Maps also revised

			in the extract).	stage.		
26	J & J Smith LE16 9TD	As above	In 5.17 HS9/05 and MXD/01 had development potential in 2014, but desk assessments bring in HSG03,07 and 11. The one I am familiar with is Barleycroft. The access to this site is identical to Toft Barn which is undevelopable. A desk assessment (i.e. not looking at the site) has classified Barleycroft as developable in 6 - 10 years	This query has arisen as a result of inconsistencies between SHLAA results from neighbouring sites from past 2 years.	Agree access problems exist as highlighted in 2014 SHLAA which identifies The Green to be unsuitable for more traffic.	Amendments to text to reflect and clarify - new numbering with notes in appendices for explanation so that it links back to consultation – Maps revised. Site A/LN/HSG/07 is not a chosen site in the NDP
27	J & J Smith LE16 9TD	As above	Using the development timescales only priority 4 or 5 (land south of Main Street is developable in 5 years and priority 2 is given a timescale of 16+ years.	This query has arisen as a result of the inconsistencies between SHLAA results from neighbouring sites from past 2 years.		Doubts about access and inconsistencies between SHLAA 2014 and 2015 - position clarified with highways. Clarification provided in Neighbourhood Plan.
28	J & J Smith LE16 9TD	As above	The plan is good through all the areas that are non specific. When it comes to designation of priorities and time scales the document is inconsistent and inaccurate. I believe that this is the most important part from the viewpoint of the residents.	Believe respondent has misunderstood the choice of sites. Rear of Barleycroft is not a chosen site		Made clearer for all readers by re formatting table and sites labelled on maps - SHLAA map labelled with consistent letters (A - J) also used in text. Site map also labelled.

29	J & J Smith LE16 9TD	as above	Specifically I believe that the Barleycroft Field HSG 07 should be undevelopable and that to pick a site with 16 + years for developability as 2nd priority makes the list untenable.		Believe respondent has misunderstood the choice of sites.	This site is not one of the top preferred sites chosen by the community and therefore is not a selected site – Changes have been made in text and maps in Neighbourhood Plan to make this clearer to the reader .
30	Michael Salter LE16 9TW	Agrees only a little with policies 01 - 03, 08,10,12,14,15, 17,18,21, 23 and 24, Disagrees with policies 05,06,11,13, 16, 22. Agrees a lot with policies 04,07,09, 19 and 20	All my responses are dictated by my opposition to any "development" in the village. Where I have indicated "a little" this is where if the worst case scenario is to be imposed upon us. I chose the best of a bad job. All building on greenfield sites in as anathema, be it for housing or business. The most appalling proposal is to build opposite the Tower House on Rushes Lane. More Houses, more people, more traffic, more dogs, less Open Space. Less a village - more a suburb.		No development is not an option if the plan is to be made. It must accord with the development plan which already identifies Lubenham for growth. If the community does not decide on preferred sites the LPA will.	Changes made to clarify importance of protecting vistas etc particularly towards listed buildings.
31	Natural England - Sean Mahoney	Thank you for your consultation on Lubenham Parish Council's Pre-Submission Draft Neighbourhood Plan which was received by Natural England on 15 October 2015. Natural England is a	Vision We support the broad vision for the parish of Lubenham. We strongly support the commitment to preserving the natural environment for the community to enjoy against the backdrop of the area's housing and development requirements. Meeting housing needs and protecting the natural environment can often seem like conflicting aims. However, when viewed through the prism of sustainable development, it is	Positive comment	No action required	No action required

		<p>non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England welcomes the opportunity to provide comments on Lubenham Parish Council's Draft Neighbourhood Plan. We have the following observations to make on specific aspects of the draft.</p>	<p>clear that they are often complementary. The natural environment provides a broad range of ecosystems services such as providing clean air, food and water which have economic and social as well as environmental benefits. Similarly, a coherent green infrastructure network not only provides health benefits to local residents by providing accessible greenspace near to where they live, it also helps the community to mitigate and adapt to the impacts of climate change.</p>			
32	Natural England - Sean Mahoney		<p>The Neighbourhood Area There are no nationally or internationally designated nature conservation sites within the boundaries of the Parish. There</p>	Positive comment		No change required

			<p>are 3 Sites of Special Scientific Interest (SSSIs) within close proximity of Lubenham, namely Great Bowden Borrowpit SSSI, Saddington Reservoir SSSI and Coombe Hill Hollow SSSI. The nearest is Great Bowden Borrowpit which is approximately 2km away. It is unlikely that development within Lubenham will have any significant effect on these sites.</p>			
33	Natural England - Sean Mahoney	Separation area	<p>We welcome the observation in paragraph 3.18 that the open spaces and shared leisure areas which include the large Village Green, Playing Field, War Memorial and allotments contribute to the character of the parish. Reference could be made to the National Character Areas (NCAs) which divide England into 159 distinct natural areas. Each is defined by a unique combination of landscape, biodiversity, geodiversity and cultural and economic activity. Their boundaries follow natural lines in the landscape rather than administrative boundaries, making them a good decision making framework for the natural environment. The parish of Lubenham falls within NCA 94: Leicestershire Vales. Key facts and data on this area can be found at the attached website link –</p>		Separation area	<p>Separation area NCA provides broad character for area – wording mentioned in modifications to strengthen separation area policies.</p>

			http://publications.naturalengland.org.uk/publication/4900422342934528?map=true&category=587130 .			
34	Natural England - Sean Mahoney	Community Engagement	<p>We are pleased to note that one of the five main themes in the feedback provided by local residents as listed in paragraph 4.9 is to protect Lubenham open spaces, natural environment, biodiversity and access to the countryside. This is reflected in the subsequent policy proposals.</p>	Positive support for community responses		No action required
35	Natural England - Sean Mahoney	Objectives and Policies	<p>We welcome the objectives listed in this section. We strongly support objectives a, c, d & j:</p> <p>a. Protect and enhance the unique culture, rural character and heritage of Lubenham and ensure that it remains distinct and separate from Market Harborough and the SDA.</p> <p>c. Mitigate growing traffic, transport and parking impacts.</p> <p>d. Ensure the environment, landscape and biodiversity is protected and enhanced by new development.</p> <p>j. Ensure new development is of a high standard and achieves high levels of sustainability particularly in relation to the</p>	Positive comment		No action required

			effects of climate change.			
36	Natural England - Sean Mahoney	LNP01	<p>We support policy LNP01 to maintain a separation area between Lubenham and Gartree and the Strategic Development Area (SDA) in order to preserve Lubenham's separate identity. We welcome the commitment to ensure that development in this area will be strictly controlled and that any development which would detract from the open character of this area or reduce the visual separation of Lubenham from Market Harborough shall not be permitted. We are pleased to note that part of the separation area will comprise agricultural land to preserve the rural character of the parish. Depending on the quality of the soil, this could help to prevent the development of land of "best and most versatile" quality (Grades 1, 2 and 3a in the Agricultural Land Classification) which should be protected as a resource for the future and to support food security.</p>		<p>Any development that 'might' be possible is likely to be small scale (otherwise it would be in conflict with the local plan and neighbourhood plan) so concerns regarding loss of high quality agric land are not significant. The sorts of development that might be possible in this area are likely to be agricultural and tourism or similar.</p>	<p>Agreed the focus is on the need to retain a gap between Lubenham (Parish) and Market Harborough in light of the proposed development of the SDA. as defined in Policy CS13 rather than the quality of the landscape We have carefully considered the comments and revised the text and the map to reflect the comments and the development boundary shown on the map.</p>

37	Natural England - Sean Mahoney	LNP02	<p>We strongly support policy LNP02 to encourage development that increases public access to open space or provides new publicly accessible open space in the parish. The provision of natural greenspace is an integral part of the creation of sustainable communities. One important function of Green Infrastructure (GI) is the provision of new opportunities for access to open space. Natural England's 'standards for accessible natural greenspace' (ANGSt) can be used to ensure new and existing housing has appropriate access to nature. More information can be found in Natural England's publication 'Nature Nearby, Accessible Greenspace Guidance' (March 2010). The CABE Space Guidance 'Start with the Park' (2005) outlines the importance of planning around green spaces, with consideration being given to the context of local landscape character and contribution to the wider GI network. The provision of new GI should be considered at an early stage to ensure it is deliverable at the planning stage.</p>		<p>These documents are aimed at very much larger development/redevelopment proposals and using examples of growth areas and international city regeneration. .</p>	No change required
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38	Natural England - Sean Mahoney	LNP03	We welcome Policy LNP03 to ensure that all new developments are designed to reflect the distinctive character and range of materials and traditional architectural features found in Lubenham.	Positive comment		No action required
39	Natural England - Sean Mahoney	LNP04	We strongly support Policy LNP04 requiring new development proposals to demonstrate that they are designed to incorporate measures that will enhance natural habitats and bio-diversity within the site or within the vicinity of the site.	Positive comment		No action required
40	Natural England - Sean Mahoney	Environment Landscape and Biodiversity	We welcome the inclusion of this section in the draft neighbourhood plan. Natural England has produced standing advice to help understand the impact of particular developments on protected or Biodiversity Action Plan species. The standing advice also sets out when, following receipt of survey information, further consultation with Natural England should be undertaken - Natural England Standing Advice.		Believe Natural England is a statutory consultee in the HDC planning system.	No action required

41	Natural England - Sean Mahoney	LNP14	We strongly support Policy LNP14 requiring new developments within the Neighbourhood Plan Area to include measures to positively enhance the natural environment and biodiversity of the area. We particularly welcome the reference to multifunctional green infrastructure provision within this policy.	Positive comment		No action required
42	Natural England - Sean Mahoney	LNP15	We welcome Policy LNP15 expecting proposals for new development to look to explore opportunities to provide for and/or enhance access to and views of the open countryside and in particular towards the River Welland, the disused railway line and towards Market Harborough, Bramfield and Gartree.	Positive comment		No action required
43	Natural England - Sean Mahoney	LNP24	We welcome Policy LNP24 requiring new developments within the Neighbourhood Plan Area to incorporate a range of sustainability measures, including the use of sustainable drainage systems. It's also worth noting the potential benefits of green infrastructure in mitigating and adapting to the impacts of climate change. There is a useful section on this in paragraph 1.3 of the publication Planning for a healthy environment - good practice guidance for green	Positive comment	Review document and strengthen the policy if needed	Reviewed - No change required

			<p>infrastructure and biodiversity. http://www.tcpa.org.uk/data/files/TCPA_TWT_GI-Biodiversity-Guide.pdf</p>			
44	<p>Harborough District Council Planning Dept Tess Nelson</p>	<p>Congratulations on preparing Lubenham draft Neighbourhood Development Plan. The comments that follow provide advice on how to tighten the policies within the Plan, in order to ensure that they meet the aspirations of the community</p>	<p>General comment: please consider replacing 'development' with 'housing development' or similar. This helps to clarify what sort of development is being referred to.</p>		<p>Agreed - review all instances and amend appropriately</p>	<p>Agreed and changes as outlined implemented</p>
45	<p>Harborough District Council Planning Dept Tess Nelson</p>	<p>Para 5.2</p>	<p>Para 5.2 – is it possible to expand this para in order to describe the landscape surrounding Lubenham village? For example, the significant ridge between the village and Market Harborough is very prominent visually and should be described. This could help to introduce and to explain the need to maintain a separation between the village and Market Harborough</p>		<p>Review -</p>	<p>Reviewed and text and map amended to take this into account .</p>

46	Harborough District Council Planning Dept Tess Nelson	LNP01	LNP01 Area of Separation - the revised policy wording is supported. However, you may wish to expand the policy to explain that some uses are acceptable (eg green infrastructure, recreation or agricultural etc? This issue seems to be being picked up by Examiners. In addition, suggest the following minor amendment:		see also comment from Natural England (33) above.	paragraphs 5.2 and 5.5 revised to better explain the justification for an enlarged area of separation. It is considered the role of the separation area is to maintain separation between the settlements and Market Harborough
47	Harborough District Council Planning Dept Tess Nelson	LNP01	Suggested change of text – see column 4 delete indicated text	Development in this area shall be strictly controlled and that which would detract from the open character of this area or reduce the visual separation of Lubenham from Market Harborough shall not be permitted. Change to :Development in this area shall be strictly controlled and that which would detract from the open character of this area or reduce the visual separation of Lubenham from Market Harborough shall not be permitted.		Agreed - changed policy text to <i>Development in this area that would detract from the open character of this area or reduce the visual separation of Lubenham from Market Harborough shall not be permitted</i>
48	Harborough District Council Planning Dept Tess Nelson	LNP01	LNP01 Area of Separation - The southern part of the proposed Area of Separation between Lubenham village and the MH SDA area is most clearly explained and justified in the supporting text. However, could the description go further and describe in more detail the	The focus on the separation area is to retain a separation area between Market Harborough including the proposed SDA and the settlements of Lubenham Parish. It is about retaining the rural	Comment reviewed Agreed the focus is on the need to retain a gap between Lubenham (Parish) and Market	We have carefully considered the comments and revised the text and the map to reflect the comments and the development boundary as shown on the map.

			<p>rationale behind the proposed Area of Separation. For example, how does the proposed area relate to the ridge, existing trees and hedges, the extent of permissions on the SDA and any other notable features which have helped to define it? The northern parts of the proposed Area of Separation (particularly between the prison and showground and south of the prison) are less clearly explained in terms of the purpose of including these areas. Suggest further explanation may be needed here, or a reduction in scale of the proposed Area of Separation to focus it on maintaining the rural character of Lubenham village itself</p>	<p>nature of the parish and preventing coalescence of what will become a developed Urban area. It is not just about Lubenham village although that is a strong consideration. Core Strategy Policy CS13 allows for <i>' a new separation area will be identified between Lubenham and Market Harborough to ensure the retention of identity and distinctiveness of neighbouring settlements;</i></p>	<p>Harborough in light of the proposed development of the SDA as defined in Policy CS13 rather than just the quality of the landscape</p>	
49	<p>Harborough District Council Planning Dept Tess Nelson</p>	LNP02	<p>It would be useful here to define what sort of development would be permitted if it increased access to POS or provides new open space. Again, Examiners seem to like the definition to be unambiguous. As one Examiner put it ' so you will permit a nuclear power station if it provided access to the countryside'.</p>		<p>More definition required</p>	<p>Policy revised to refer to new residential development only. Policy now reads Policy LNP02 New residential Development that increases/improves access to public open space or provides new publicly accessible open space in the parish will be supported provided it does not worsen flood risk in the vicinity. In particular access to a. the River Welland making it more accessible to the public while protecting its natural features and species and;</p>

						<p>b. the disused railway line making it more accessible for walking or cycling while protecting its natural features and species and;</p> <p>c. footpaths and footways leading into the open countryside and linking the communities and;</p> <p>d. new areas of public open space within the SDA; will be encouraged where it also accords with other relevant policies in the development plan.</p>
50	Harborough District Council Planning Dept Tess Nelson	LNP03	<p>The addition of the 'Buildings' section is useful. However, this policy could provide more details of the particular architectural features and choice of materials which are encouraged in Lubenham village. This would help to clarify exactly which features and materials are required, and help with the implementation of the policy. Also, does the policy just refer to Lubenham village or to all settlements within the parish? Do they all have similar materials and distinctive architectural features? If not, you could highlight the particular elements for each settlement.</p>		<p>Agree that different parts of the parish have different characteristics. We agree we don't want to stifle innovation and new design but are concerned about good design appropriate to the settlements. Think we shouldn't prevent the design of the future using energy efficient natural materials - if one is ever designed. E.g. green roofs –etc</p>	<p>Policy revised to read as follows: Policy LNP03 All new residential developments should be of a high standard of design and layout:-</p> <p>(i) they should reflect the height, scale and mass of existing neighbouring buildings and;</p> <p>(ii) they should reflect the quality of material finishes found in the vicinity and;</p> <p>(iii) they should utilise features of vernacular architecture more commonly found in the vicinity.</p> <p>Development close to and within the Lubenham Conservation Area in particular shall be designed to the highest standards to</p>

						ensure the character and appearance of the Lubenham Conservation Area and its setting are preserved and enhanced.
51	Harborough District Council Planning Dept Tess Nelson	LNP04	This policy could be difficult to implement, because as currently drafted it applies to all developments. Could it be re-worded perhaps to only apply to major developments (of 10 or more houses for example)? Otherwise, it applies to small residential extensions, for example, which is unlikely to be considered a reasonable requirement		broadly agree should exclude residential extensions but include more than 5 dwellings.	Amended to read <i>for developments of 5 or more units</i>
52	Harborough District Council Planning Dept Tess Nelson	Para 5.17 and 5.18	Paras 5.17 and 5.18 – please refer to the latest SHLAA (Technical Consultation Draft, July 2015). This includes all the sites for Lubenham and supersedes the 2014 SHLAA. A/LN/MXD/01 is now referred to as A/LN/HSG/12 in the 2015 SHLAA. It might also be worth stating that two other sites (Harborough Rd and Laughton Rd) are identified as developable in the 2015 SHLAA, but in the longer term (ie beyond 2031, so have not been included in the draft Neighbourhood Plan).		Needs discussion	Noted correct numbers on this document and as appropriate in Neighbourhood Plan and relevant appendices para 15.17 and 15.21 revised to reflect latest SHLAA annotation

53	Harborough District Council Planning Dept Tess Nelson	LNP05	<p>Housing allocations – this policy is welcomed and appears to be in general conformity with the Core Strategy policy CS17 in promoting appropriate levels of housing development in Selected Rural Villages, such as Lubenham. This policy could be expanded to include reference to anticipated densities and to identify the number of dwellings expected on each site. You may also wish to add further requirements in relation to the layout of schemes on each of the allocated sites. It would be useful to include a map showing all the proposed allocated sites close to this policy, to avoid the need to scroll up to Map 3. In relation to point (v), please refer to the HDC policy for POS contributions (or any later versions of this policy) ‘Provision of Open Space, Sport and Recreation’ (HDC, 2009). This includes the entire relevant evidence base, which form the basis for this policy. Point vi – all proposed development – this needs to be defined as the statement could include an extension etc. Point viii is open to interpretation and could be difficult to implement. Again, are there particular architectural features or a range of materials you would like to direct developers to?</p>	<p>These comments seem to be pointing towards a specific policy for each allocated site</p>	<p>The policies might be very similar but provide the opportunity to identify site specific requirements such as access to the river for the site south of main street?</p>	<p>Comments incorporated but site specific policies not considered necessary.</p> <p>Policy wording revised to refer to number of dwellings per site, clarification of open space requirements as suggested and clarification that policy relates to new residential development.</p>
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54	Harborough District Council Planning Dept Tess Nelson	LNP06	Policy LNP06 Housing Reserve Site – the inclusion of this policy is welcomed			Noted. Slight changes to policy made to clarify that it relates to new residential development and to be consistent with other policies.
55	Harborough District Council Planning Dept Tess Nelson	LNP11	Suggest a minor change to the wording here, again to be more precise about the meaning of 'development'. The current wording would require future house extension applications to make a financial contribution to crossing facilities in Lubenham, which clearly would not be reasonable. Suggest changing:	<p>Suggested change - All new developments within the SDA shall contribute towards/provide measures to mitigate against the adverse impacts of projected increased traffic levels associated with the SDA passing through the Lubenham main settlement.. To</p> <p>All new developments within of the SDA shall contribute towards/provide measures to mitigate against the adverse impacts of projected increased traffic levels associated with the SDA passing through the Lubenham main settlement</p>	Agree	Noted and changes made to read: Development of the SDA shall provide measures to mitigate the adverse impacts of projected increased traffic levels associated with the SDA passing through the Lubenham main settlement. These mitigation measures shall be proportionate to the impacts of the development and may include (but need not be limited to), a pedestrian/cycle fully controlled crossing point on the A4304, and localised junction improvements

56	Harborough District Council Planning Dept Tess Nelson	Policy LNP19 Gartree Policy	<p>It is unclear what scale of growth is proposed at this location. However, Gartree is not identified as a selected rural village in the Core Strategy, and as such is identified as open countryside. Core Strategy CS17 explains that development in the countryside will be strictly controlled. LNP19 needs to be in broad conformity with this strategic policy, and as such needs further clarification. Gartree is not considered to be a sustainable location for further residential development. It is also unclear whether part c) of the policy would meet planning obligations tests (NPPF para 204) – i.e. obligations must be necessary and directly related to the development (ie. must help to meet the needs generated by the development, not pre-existing needs).</p>		<p>Gartree is as sustainable as the village settlement and has footway access to Foxton facilities some development there may be appropriate? There are opportunities for appropriate small scale development.</p>	<p>Information relating to Gartree's footpath links with Foxton and Foxton facilities added. Reference to residential development in this policy is removed and policy re-worded as follows: - Exceptionally some limited employment/business development may be supported on environmentally acceptable sites in Gartree if;</p> <ul style="list-style-type: none"> a. It will have no adverse effects upon the living conditions of nearby residents by reason of noise nuisance, odour nuisance, likely excessive disturbance or traffic generation and; b. It will contribute to the retention and viability of rural services or land based businesses, aids farm diversification, or promotes the conversion and re-use of appropriately located and suitable constructed existing buildings and; c. it will enhance the viability and vitality of the community and it will provide/enhance links to community facilities/services and; d. will contribute to upgrading the roads and paths in and around the settlement at a level proportionate to the impacts of and made necessary by the development.
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57	Harborough District Council Planning Dept Tess Nelson	Map 3 SHLAA sites	Suggest replacing the version of Map3 (SHLAA sites) at para 5.16 with the version shown within the appendices since this is more up to date.	SHLAA sites - the new map includes sites not earmarked for development in the plan period and classifies them as developable in 6 - 10 years, which is what causes the confusion.	This requires clarification amendment.	More up to date map used at map 3 as recommended.
58	John Coleman William Davies and Hallam Land Management	Thank you for making me aware of the Draft Neighbourhood Plan that is out for public consultation. This response to the consultation is submitted on behalf of William Davis Ltd and Hallam Land Management. We only wish to comment upon Policy LNP01 (Area of Separation) so we have not completed the Comment Form.	By prescribing what is essentially a Lubenham, Market Harborough and Gartree Separation area, the defined area is inconsistent with Strategic Policy CS13 of the Core Strategy which makes provision for identification for a new area between 'Lubenham and Market Harborough'. On this basis the policy will fail to meet the terms of the basic conditions for conformity with Strategic Policies of the Development Plan. The defined area should also be founded on robust evidence related to what are logical landscape boundaries taking into account landscape character and local topography. We have commissioned a short report from FPCR to address these landscape issues and they have recommended a revised boundary that is based on detailed landscape evaluation (see Figure 5 in the attached	Please see attached landscape report by FPCR.	Comments noted	Comments noted and explanation of purpose of larger chosen separation area provided. Eastern boundaries of Area of Separation revised to reflect accurately the boundaries of the development sites, to identify with boundaries on the ground and to reflect the purpose of the separation area, which is to maintain a gap between Lubenham settlements and Market Harborough and to maintain views across land and fields and to prevent coalescence.

			report). We consider that the proposed boundary to the Area of Separation should be amended to accord with that shown on Figure 5.			
59	John Coleman William Davies and Hallam Land Management	SDA Map	Whilst making these representations we would also wish to point out that the boundary shown for the SDA area (on Map 2 in the Draft Neighbourhood Plan) shows an incorrect detailed redline for the SDA. The red line taking account recently permitted planning applications is correctly shown on Figure 5.		Need to review Masterplan, planning application and adjust if necessary.	Eastern boundaries of Area of Separation revised to reflect as accurately as possible the boundaries of the development sites and to reflect the purpose of the separation area, to maintain a gap between Lubenham settlements and Market Harborough and to maintain views across land and fields and to prevent coalescence as defined in Core Strategy Policy CS13
60	Rev PJC Clements and Mrs Sussie Clements	Agrees a lot with all policies			Noted	No action
61	LE16 9TJ	Returned housing needs survey not response sheet to consultation			Noted	No action