

APPENDIX

Leicestershire County Council Officer Comments on Harborough District Council's Issues and Options Regulation 18 Local Plan Consultation (January 2024)

Sustainability Appraisal	
1	Do you have any comments on the Issues and Options Sustainability Appraisal report? Do you consider the approach appropriate? Do you agree with its findings?
	There are no comments on the Issues and Options Sustainability report at this time.
Local Plan Vision	
2	Should the Corporate plan be used as a basis for preparing a Vision for the new Local Plan?
	<p>Broadly, the Corporate Plan is a sensible basis for the Vision for the new Local Plan, ensuring alignment with broader strategic goals to support the overall strategic direction of the district.</p> <p>To a large extent the attainment of the authority's strategic goals outlined in the Corporate Plan is dependent on planning policy complimenting and underpinning those strategic aims. Accordingly, unless the Corporate Plan is considered out of date in is essential that the Vision for the new local plan reflects the wider vision for the District.</p> <p>It should be recognised however, that the new Local Plan looks to 2041 whereas the Corporate Plan only looks to 2031. The longer-term vision necessary in the Local Plan should therefore not be restricted by the Corporate Plan. The Local Plan should also take account of cross-boundary issues and challenges faced by the City and County as a whole.</p> <p>The Corporate Plan positively emphasises the importance of health and wellbeing and healthy life choices to improve life chances as well as the importance of community belonging, sustainable environments and supporting local economy which is crucial for employment in the area. All of these are necessary for positive health and wellbeing outcomes.</p>
3	What should the Local Plan Vision say?
	<p>The Local Plan Vision should articulate the way in which Harborough will be developed, protected and enhanced over the plan period, recognising local distinctiveness and meeting the specific needs of Harborough, in the wider context of Leicestershire. This should include capturing that this Plan starts the journey of pivoting the delivery of growth across the Leicester and Leicestershire Housing Market Area to the spatial strategy set out in the Strategic Growth Plan to 2050.</p> <p>The Vision should identify those areas of the Corporate Plan that the new Local Plan will deliver or make a significant contribution towards their attainment and incorporate them within its vision. Against this background, the NPPF at paragraph 15 advises that the plan "should provide a positive vision for the future of each area; a framework for meeting housing needs and addressing other economic, social and environmental priorities; and a platform for local people to shape their surroundings."</p>

	<p>The Local Plan Vision should reflect a commitment to sustainable development, balancing economic and housing growth with environmental stewardship, and enhancing the quality of life for all residents. This should include the importance of health and wellbeing and encouraging healthy life choices as well as outlining the wider determinants needed to achieve this such as employment, housing, education and skills. Creating school places in the correct area of the district will help build a future and give children the best life chances and opportunities. The Vision should also emphasise the district's aspirations towards achieving net-zero emissions and fostering a vibrant, inclusive community.</p>
Local Plan Strategic Objectives	
4	Do you agree with the proposed objectives for the new Local Plan?
	<p>Broadly speaking, the objectives as listed appear to cover most of the areas expected and the objectives are generally considered to be sound, incorporating all the necessary areas that have to be covered within strategic policies in accordance with NPPF guidance. There are suggestions for amendments/enhancements to the objectives, however (see response to Q5).</p>
5	Are there any additional suggestions that should be included in the proposed objectives?
	<p>Yes.</p> <p>Objective 2: It is suggested that in further developing this objective, consideration should be given to it covering support for existing businesses in transitioning to zero emission vehicles. An example of this could be through Plan Policy provision for hydrogen fuelling hubs for HGVs, based on evidence developed by Midlands Connect.</p> <p>Objective 3: It is suggested that this should be the first objective listed and that reference should also be included to the scale (and not just location) of new housing and employment development required to support sustainable growth. Additionally, this objective should also be adapted to reflect that this will be a spatial strategy that begins / lays the foundation / provides for pivoting towards the delivery of the Strategic Growth Plan Housing Market Area Spatial Strategy including through cross-boundary coordination with adjoining Local Plans (and their site allocations, especially those adjoining). Alternatively, it may be considered more appropriate to deal with this through a separate objective.</p> <p>Objective 5: It is suggested that this objective should be expand (e.g. the second bullet) to cover quality being maintained over the lifetime of a development. It is further suggested that in terms of referencing sustainable development, mention could be made of the provision of EV charging infrastructure. It is also suggested that 'health' be added to the Objective 5 heading so that '<i>Objective 5: Securing sustainable, high-quality places through design led development</i>' becomes '<i>Objective 5: Securing sustainable, high-quality healthy places through design-led development</i>'. There may also be an opportunity to recognise the health and wellbeing of existing residents in one of the other key aims without it being in the context of new developments. We would welcome an objective to improve health and wellbeing of all residents (not just for those in developments). It is suggested that the last bullet point is changed from '<i>Using design to support health, well-being and active lifestyles as well as to prevent anti-social behaviour.</i>' to become '<i>Using design to support health, well-being and active lifestyles in new developments and improve the health enhancing opportunities within established areas in order to improve the health and</i></p>

	<p><i>wellbeing outcomes of all our residents across the life course, and to continue to create safe, secure spaces and places that prevent anti-social behaviour’.</i></p> <p>Objective 6: It is suggested that this objective could be expanded to talk about working with cross boundary districts to provide sustainable cross boundary development and associated infrastructure in terms tackling climate change. Developing a circular economy and conservation or sustainable use of non-renewable resources could be added as part of this.</p> <p>Objective 8: Improving open space and biodiversity. Add to this objective the exploration in the district for the designation of one or possibly two Country Parks with the necessary infrastructure to ensure ease of access and usage. The bullet point ‘Incorporating play space for all ages and abilities of children into all scales of new development as appropriate’ could be amended to recognise the need for recreational opportunities through the life course i.e. ‘Incorporating play, recreational space for all ages into all scales of new development as appropriate. Creating welcoming and safe play and recreational spaces for all residents’. Greater emphasis could be placed on the benefits to health afforded by easily accessible open space. Recent research from Make Space for Girls and the Safer Parks report made several recommendations to improve usage of parks and green spaces for girls and women by making parks feel safer and more secure. If there is an opportunity to feed this information in Public Health are happy to support. Given the growing prominence of Biodiversity within the planning system Objective 8 could also be strengthened to reflect the need to meet statutory requirements as a minimum.</p> <p>Objective 9: It is suggested that the wording be amended to alter ‘public transport’ to ‘passenger transport’ (which is a more inclusive phrase to embrace a whole range of provisions). Also, to remove or amend the reference to ‘County Council’ delivering options, as in some cases (e.g. new employment developments) it is often more appropriate for the site developer to identify and deliver a solution and it is also reflective (in line with the comment on Objective 3) that the location and scale of new development (the responsibility of the Plan making authority) is a key determinant as to whether there are viable options for passenger transport provision.</p>
Duty to Cooperate and Effective Joint Working	
6	Do you agree with the strategic matters identified by the Council and are there any changes or additions you consider should be made at this stage?
	<p>In general terms, yes and the strategic matters that the plan proposes to cover appear to meet the requirements of the NPPF. But, in line with responses to earlier question responses it surprising that this section does not explicitly reference the Strategic Growth Plan and the strategic planning and evidence work, and cooperation / coordination that will be required across several Local Plans to give effect to its implementation in practice. Also, given the proximity of the District boundary to authorities outside the Leicester and Leicestershire Housing Market Area, consideration should be given to co-operation with those LPAs.</p> <p>It would be beneficial to include a stronger emphasis on sustainable transportation and infrastructure planning to accommodate growth, particularly in the context of net-zero targets and the interrelation of urban and rural areas in Leicestershire. Furthermore, these cooperative efforts facilitate a more holistic approach to planning that considers the interrelations between urban and rural areas. This is important for ensuring balanced regional development and for preserving and enhancing cultural and historical heritage.</p>

	<p>We would welcome additional reference to strategic matters under paragraph 4.4, for example a bullet point 'Ensuing healthy places that support positive health and wellbeing outcomes across the life course' or 'Supporting healthy places that enable and support healthy choices and behaviours'.</p> <p>Minerals safeguarding is important in the assessment and allocation of any sites. Waste site safeguarding is also important in the consideration of sites and the vision, so as not to prejudice the waste hierarchy, which is the responsibility of all local authorities, not merely the County Council. Whilst we are aware this section is not yet allocating sites, perhaps protecting and safeguarding finite resources as well as 'reuses and recycles resources' is appropriate? The use of waste as a resource could be mentioned.</p> <p>It is also an NPPF requirement (para 210 e) for the district to identify and safeguard mineral related infrastructure (existing, planned and potential storage, handling and transport sites for minerals) where it is not located on an active mineral site.</p> <p>PPG for Minerals at para 006 (Reference ID: 27-006-20140306, Revision date: 06 03 2014) indicates that in two tier authority areas, responsibility for safeguarding facilities for the above will rest largely with the district planning authority except where such facilities would be located at quarries.</p>
Scale of Housing Growth	
7	What should the housing requirement be in the new Local Plan?
	<p>The housing requirement should reflect a balance between meeting local needs and supporting sustainable growth and there should be a mixture of housing to support strong communities being formed within new developments and to ensure that new developments allow for community adhesion within existing settlements, where families are supported with access to suitable community facilities.</p> <p>The level of housing growth should as a minimum align with Option B (657 dwellings per annum, Local Housing Need plus a contribution of 123 dwellings per annum towards meeting Leicester's unmet housing need) in order to provide for a proportion of the unmet needs of Leicester City (as outlined in the Housing and Economic Needs Assessment and the Leicester and Leicestershire Authorities' Statement of Common Ground relating to Housing and Employment Land Needs), and consideration should be given to move towards Option C (780 dwellings per annum) to take account of the potential for higher than anticipated economic growth generated by further inward investment in the district. Further, having regard to the currently assessed needs for Affordable Housing as detailed in the HENA there is a strong argument for a minimum overall housing requirement above Option B, towards Option C.</p> <p>It should be noted that the Housing and Economic Needs Assessment covers the period to 2036, whereas the new Plan is intended to run 2041.</p>
8	What level of housing supply contingency should we plan for?
	A contingency level of around 15-20% could be appropriate, providing flexibility and resilience to manage uncertainties and fluctuations in housing demand and supply over the plan period.

Plan Period	
9	<p>Do you agree the start of the plan period should be 2020 and an end date of 2041?</p> <p>Yes, though note that aligning with the HMA's long-term vision for growth across Leicester and Leicestershire (as set out through the Strategic Growth Plan) would require future Local Plans across the HMA (including this one) to look ahead as far as possible to set out and provide for longer term strategic infrastructure, given the time that it would take to plan for and deliver such and the potential need for policy safeguards to be in place such that future delivery is not compromised/frustrated.</p> <p>Accordingly, whilst the County Council recognises that the Local Plan needs to look ahead a minimum of 15 years from adoption, we suggest HDC should go further to consider and allow for longer-term infrastructure requirements by taking the opportunity to set out at least a 30 year vision as required by the NPPF (December 2023).</p>
Settlement Hierarchy	
10	<p>Do you agree the proposed settlement hierarchy is appropriate. If not, how should it be changed?</p> <p>This Local Plan should be pivoting towards the delivery of the Strategic Growth Plan Housing Market Area (HMA) spatial strategy. It is therefore surprising that there is no reference as to how the hierarchy aligns with and might evolve in respect of the Priority Growth Corridor (PGC). The document feels too static. A couple of examples of this include:</p> <ul style="list-style-type: none"> • Potential development sites/clusters adjoining existing Leicester Urban Area settlements beyond the Harborough District boundary and therefore not included in the draft settlement hierarchy (e.g. Oadby and/or Evington in the case of the Farmcare Estate and Stretton Hall Sites referenced in paragraph 5.34 of the consultation document • Sites that could potentially form standalone new settlements either in their own right or as part of possible wider cumulative/cross-boundary development clusters (e.g. the Whetstone Pastures Garden Village and Land East of Broughton Astley sites also alluded to in paragraph 5.34 <p>Such issues are also likely to be relevant to consideration of roles of existing and/or the creation of new town centres – see response to Q57.</p> <p>From a transport infrastructure/service provision and connectivity perspective, the understanding of economic and wider relationships (including with town centres in any future 'poly centric model') is critical from a planning point of view as is the understanding as to how the roles of settlements might transition throughout the lifetime of the Plan.</p> <p>It should be noted that some settlement areas are already seeing high demand for educational infrastructure – e.g. Market Harborough & Lutterworth.</p> <p>LCC in its role as a landowner</p> <p>The settlement hierarchy shows improvements compared to the current hierarchy contained in the local plan 2011-31 with the introduction of Large and medium villages more accurately reflecting the relative levels of infrastructure and services available in Broughton Astley, Fleckney, Great Glen and The Kibworths compared to the higher tier market towns and the medium villages, being the balance of the previous rural centres.</p>

Housing Spatial Options	
11	<p>Do you agree with the options considered for the location of housing development? Should any of the options be changed or additional options included?</p>
	<p>Yes, agree with the options presented for consideration.</p> <p>The options outlined provide a basis for discussion of the potential distribution of housing across the District; each option having its merits. It may be beneficial to explore an additional option that further integrates the principles of sustainable development, focusing on areas with existing infrastructure and potential for public transport enhancements, thereby supporting the county's net-zero ambitions. To draw conclusions it is necessary to have an awareness of the capacity of existing infrastructure and the potential sustainable infrastructure solutions required to mitigate the impacts of growth. The alternative potential options are likely to involve a mix of those already detailed and as such would add little to the determination of a coherent policy.</p> <p>Dependant on which options are preferred. The education sufficiency team will complete a full options appraisal of the education structure required to inform the local plan.</p> <p>See also response to Q12.</p>
12	<p>Which option or options for the location of homes do you consider to be the most appropriate? This could be one of the options or a mix of several.</p> <p><i>Option 1: Local Plan Strategy, Option 2: Proportional Growth, Option 3: Urban Area Focus, Option 4: Strategic Sites Focus, Option 5: Market Town Focus, Option 6: Large Village Focus</i></p>
	<p>The County Council anticipates the spatial distribution coming through this new Local Plan will focus on Market Harborough and Lutterworth as the market towns in the district, complemented by the identification of clusters of strategic sites identified adjacent, or close to, the Leicester Urban Area (LUA), to form extended neighbourhoods or new settlements. The County Council's preference would be a spatial strategy that gets as close as realistically possible to Option 4, with recognition of the need for flexibility to enable delivery of sites in its earlier years, whilst work continues in parallel to enable delivery of strategic scale sites.</p> <p>There are four key reasons; firstly, the need to support the sustainable growth of the main towns; secondly, the need to protect the character and identity of existing settlements in the rural area; thirdly, the need to bring forward clusters of strategic sites which will form attractive and sustainable neighbourhood extensions or new settlements in locations which provide ease of access to jobs and services, many of which are in adjacent boroughs or districts or in the City; and fourthly, recognition of the geographical constraints of Oadby & Wigston Borough to accommodate further growth in the future in addition to the current identified unmet need of Leicester City and the redistribution of a proportion of the unmet need to each Leicestershire district.</p> <p>Furthermore, this new Local Plan needs to include allocations for clusters of strategic sites to come forward so master planning can begin, or be advanced, and infrastructure requirements (for example strategic delivery of school places) can be thoroughly considered at an early stage to help enable timely delivery. A delay until the next round of Local Plan making is likely to result in significant pressure for growth being felt in existing settlements, including those further down the settlement hierarchy where provision for local needs only is likely to be most appropriate.</p>

The County Council will work closely with Harborough District Council, Oadby and Wigston Borough Council, Blaby District Council and Leicester City Council to help bring forward cluster strategic sites in appropriate locations. It is recognised the infrastructure requirements for such allocations will entail infrastructure beyond the local site level and hence commitment by Harborough District Council and other councils is needed to identify, pursue and secure longer term strategic infrastructure.

A significant first step has been the commitment in the South Leicestershire Local Plan Making Statement of Common Ground (November 2021) to the three districts (and latterly also Hinckley and Bosworth Borough Council) working jointly on three aspects of planning policy evidence:

1. Strategic Transport Assessment
2. Whole Plan Viability
3. Infrastructure Delivery Plan

The County Council wishes to see this evolve through an updated timetable and commitment to the delivery of the Infrastructure Delivery Plan (which will need to evolve into an Infrastructure Delivery Strategy under the new Levelling Up and Regeneration Act) including working collaboratively with National Highways and Homes England. A longer term Strategic Infrastructure Delivery Plan/Strategy extending beyond the Local Plan period is also desirable, setting out items of strategic infrastructure necessary to enable the clusters of strategic sites to function and connect well to other areas and reflecting the longer term vision of the Strategic Growth Plan.

In line with responses to earlier questions, pivoting to the delivery of the Strategic Growth Plan (SGP) Housing Market Area (HMA) spatial strategy is not going to happen 'overnight'; delivery of strategic scale sites and the necessary enabling infrastructure (transport or otherwise) takes many years in the planning (and hence the importance of starting as earlier as possible to do so). Option 4 is preferred with recognition that it is understood the new Local Plan will require some flexibility to enable delivery of sites in its earlier years, whilst work continues in parallel to enable delivery of strategic scale sites.

This flexibility would be subject to the:

- Plan making clear that any such approach is only being taken as part of enabling a pivoting to the SGP HMA spatial strategy and strategic scale sites (as per Option 4 of those presented);
- scale of growth in areas not aligned with the SGP is not of a scale that would ultimately lead to a dilution of the scale of growth located in Strategic sites (and by extension that would dilute the case for infrastructure investment (transport or otherwise) required to enable Strategic site delivery); in that regard, neither Option 1, 2, 5 or 6 could be supported; and
- Plan providing the necessary policy framework to enable / to safeguard the pivot to SGP spatial strategy.

Notwithstanding the above comments about the options presented, it is important to note that from a transport perspective (and likewise from other perspectives too, including education), given that the new Local Plan is required to provide for a particular level of growth, then regardless of how it is distributed that growth is likely to give rise to

similar levels of overall service/ infrastructure requirements, even if the distribution of such requirements is somewhat different dependent on how the growth is distributed; e.g. it would be inaccurate to suggest that only strategic sites will generate strategic infrastructure requirements, especially over the longer term.

By extension, the descriptions fail to make the counter point that delivering strategic infrastructure requirements could actually be made more and not less difficult to deliver by a more dispersed pattern of growth (as borne out by the situation with the new Charnwood Local Plan currently undergoing examination in public).

It should also be noted that Minerals safeguarding and waste safeguarding must be important considerations in the allocation of sites and Harborough District Council should be aware of a number of proposals including with regard to the proposed closure of the Market Harborough Recycling and Household Waste Site and as such, further to stakeholder feedback and subsequent decision making, this site may cease to be operational.

LCC in its role as a landowner

Mindful of the guidance provided in the NPPF it is clear that housing needs to be delivered at different scales in appropriate locations across the District.

The importance of strategic sites and urban extensions is recognised at NPPF paragraph 74. This is a valuable starting point for the larger scale development required to meet overall numbers but essentially falls between Options 3, 4 and 5. Having regard to existing allocations and the infrastructure required to support delivery a further extension to the East of Lutterworth SDA, for example, would provide a sustainable extension to an existing Market Town designed to garden village principles, supporting its own primary schools and neighbourhood centres and supporting the delivery of key infrastructure achieved within a 20 minute walking distance of a district centre thereby securing a significant proportion of the numbers required. Accordingly, consideration should be given to the allocation of the East of Lutterworth extension site (SHELAA ref 21/8152) which is available and capable of delivery as an integral part of the existing development area.

Within the other tiers of the settlement hierarchy, particularly the Large and Medium Villages the level of housing allocations should be commensurate with the levels required to support the community infrastructure and services available (or potentially available). Being smaller in size such developments will provide the opportunity for the plan to meet the requirements of the advice provided by NPPF Paragraph 70. Attention is drawn to SHELAA sites ref 21/8180, 21/8181 and 21/8190 situated at Ullesthorpe, Husbands Bosworth and Billesdon respectively all of which are available and deliverable and provide the opportunity to both deliver much needed housing and additional community benefits.

At the lower end of the hierarchy namely the small villages and hamlets policy should be mindful of the advice in NPPF paragraphs 73, 82 and 83 and support the development of sites that support the ongoing needs of communities and the maintenance of community services such as primary schools, public houses and village stores and meeting the local needs of each locality.

	In conclusion it is considered that no individual option will deliver the required pattern of development which should seek to an evidence based balance maximising the potential to achieve sustainable development.
Scale of Employment Growth	
13	Is the HENA an appropriate evidence base on which to formulate our employment land policies? If not, why not?
	<p>The HENA would be the most appropriate evidence base by which to assess basic employment land needs having been published post-Covid thereby taking account of changed market demand resulting from changing working practices which has resulted in a fall-off in the demand for office space. It should also consider most up-to-date local economic data and trends to ensure the employment land policies are responsive to current and future market needs.</p> <p>See also response to Q14.</p>
14	<p>Which option (A, B or C) do you consider most appropriate to include in Harborough's new Local Plan?</p> <p><i>Option A - Make no additional allocations of employment land in Harborough District.</i></p> <p><i>Option B - Adopt a longer-term approach and allocate additional land for employment to maintain a flexible supply and support sustainable development</i></p> <p><i>Option C - Plan for greater growth to meet any enhanced economic aspirations or regeneration priorities for the District</i></p>
	<p>NPPF paragraph 85 advises "Significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development." Options for employment land provision (scale and location) should be developed in accordance with an approach that best gives effect to pivoting to the Housing Market Area spatial strategy set out in the Strategic Growth Plan. Accordingly, given the potential for continued inward investment into the area generating further economic growth Option B appears most suitable.</p> <p>Adoption of Option B would require the approach to the housing strategy to take a similarly longer term view too (i.e. beyond 2041) – at the least to ensure that people employed in those extra jobs have somewhere to live 'locally' in the interests of sustainable development – nevertheless, a longer-term approach provides the best basis for the planning of and seeking to secure investment in the service and infrastructure needs required to support the Housing Market Area's growth out towards 2051 and beyond.</p>
15	If Option B or C, are there any other evidence base studies which are required? If so, why?
	<p>If opting for Option B or C, additional studies on transport infrastructure, environmental impact, and local economic trends including current market demand/supply would be beneficial to ensure the allocated land supports balanced and sustainable growth.</p> <p>Minerals and waste safeguarding should form important considerations in any policy making or evidence studies.</p>
16	Are there any other options that we could consider?
	Any option should consider merits of mixed-use developments, which can provide a balance of employment and residential use, fostering more sustainable, integrated communities.

	<p>The opportunity should be taken to review existing unfulfilled allocations ensuring they are brought forward to support the most appropriate form of employment given currently assess need and market demand. Being a largely rural area there needs to be specific policies to support and encourage a prosperous rural economy encouraging the expansion of established enterprises and farm diversification.</p>
Location of Employment Growth	
17	<p>Which option do you consider most appropriate to include in Harborough's new Local Plan?</p> <p><i>Option 1 - Intensifying the density of employment uses in existing employment areas in appropriate and sustainable locations.</i></p> <p><i>Option 2 - Continue with the current approach of focussing new employment land in the District's main economic centres (Market Harborough, Lutterworth) and larger sustainable settlements.</i></p> <p><i>Option 3 - Align new employment land provision with areas of significant housing growth.</i></p>
	<p>In common with the distribution of housing, no single option provides a wholly satisfactory solution. Accordingly, a hybrid solution would be preferred reflecting shorter and longer term planned development, enabling existing areas of employment to extend their economic life, encourage additional employment in areas of housing and economic growth and provide employment opportunities within or collocated with new settlements and sustainable urban extensions making best use of existing and planned infrastructure.</p> <p>Further to responses to previous questions, pivoting to delivery of the Strategic Growth Plan (SGP) Housing Market Area (HMA) spatial strategy is not going to happen 'overnight'; delivery of strategic scale sites and the necessary enabling infrastructure (transport or otherwise) takes many years in the planning (and hence the importance of starting as earlier as possible to do so). In recognition of this, it is understood the new Local Plan will require some flexibility to enable delivery of sites in its earlier years, whilst work continues in parallel to enable delivery of strategic scale sites. In that regard, of the options presented, Option 1 would appear to be a pragmatic basis for development delivery in the new Plan's early years, but subject to the:</p> <ul style="list-style-type: none"> • Plan making clear that any such approach is only being taken as part of enabling a pivoting to the SGP HMA spatial strategy and strategic scale sites; • scale of growth in areas not aligned with the SGP is not of a scale that would ultimately lead to a dilution of the scale of growth located in Strategic sites (and by extension that would dilute the case for infrastructure investment (transport or otherwise) required to enable Strategic site delivery); in that regard, Option B could not be supported; • Plan providing the necessary policy framework to enable / to safeguard the pivot to SGP spatial strategy; and • Plan vision providing for the pivot 'journey'. <p>Subject to responses to earlier questions about the location and scale of new housing development, Option C appears to be the most appropriate in principle for the long term basis of the Local Plan.</p>
18	<p>Are there any other options that we could consider?</p>

	<p>Yes, consider options that enhance connectivity between different areas within the district, focusing on sustainable transport and digital infrastructure. This approach can support balanced economic growth and improve accessibility.</p> <p>See also the response to Q17.</p>
19	<p>Is the approach to Bruntingthorpe Proving Ground and Leicester Airport appropriate? If not, why not.</p>
	<p>The approach seems appropriate but it should include considerations for minimizing environmental impact and integrating these sites more effectively with the surrounding areas, ensuring they contribute positively to local economic and infrastructural development.</p> <p>It may also be appropriate to review the policies to ensure that any further future development at either of these locations does not undermine the pivoting to the Strategic Growth Plan Housing Market Area spatial strategy.</p>
Approach to Strategic Warehousing	
20	<p>Is the Warehousing and Logistics in Leicester and Leicestershire: Managing Growth and Change (April 2021) study an appropriate evidence base on which to formulate policy for strategic warehousing? If not, why not?</p>
	<p>This study provides a solid foundation and suitable evidence base to establish basic need but should be supplemented with up-to-date local economic data and trends to ensure the warehousing and logistics policies remain relevant and responsive to current and future market needs.</p> <p>It should be recognised however that in the long term as and when strategic transport infrastructure comes forward to open up strategic growth sites to the south and east of the City of Leicester (as per the Strategic Growth Plan), this might open up new locational opportunities for strategic warehousing. Furthermore, as the transition takes place to zero-emission HGVs, available capacity in the grid network and/or accessibility to hydrogen refuelling hubs could become another influencing locational factor.</p>
21	<p>Is the approach to focus strategic warehousing at Magna Park still appropriate? If not, why not?</p>
	<p>See also response to Q20. Focusing strategic warehousing at Magna Park remains appropriate, given its established infrastructure and strategic location. However, ongoing review and adaptation are necessary to respond to evolving market demands and environmental considerations.</p> <p>LCC in its role as a landowner</p> <p>The continued expansion of Magna Park should be considered in the context of not just the availability and deliverability of further expansion land but also have regard to landscape impact and the need to afford protection to surrounding settlements by the establishment of areas of separation. Coupled with the need to redevelop those units constructed at its inception there is an argument to locate some strategic warehousing in locations within Area of Opportunity 6 that are equally accessible to the strategic road network, for example, adjacent to M1 Junction 20 where colocation with the East of Lutterworth SDA will provide easy access to market and affordable housing.</p>

22	Should uses other than strategic warehousing or other flexibility be allowed at Magna Park to ensure it can adapt to the market needs of the sector? If so, what, and why?
	<p>Yes, allowing a mix of uses could enhance the adaptability and sustainability of Magna Park. This could include light industrial, logistics-related services, and potential office spaces, fostering a more diverse economic environment as well as facilitating the reuse of sites that are no longer attractive to the strategic warehousing/logistics sector thereby making an effective use of land.</p> <p>From a transport perspective, allowing other uses should not result in a 'dilution' of / distract from Magna Park's primary purpose or result in a type of development that could not be safely and satisfactorily accommodated on the surrounding road network.</p>
Small and Medium Housing Sites Requirement	
23	How should we diversify the housing market in the District to meet the requirement to provide more housing on smaller sites (one hectare or less in size)?
	<p>Diversity can be encouraged through varied housing types, such as townhouses, duplexes, and small-scale apartment buildings, which can efficiently utilise smaller sites and developments that cater to different demographic groups and affordability levels can be incentivised.</p> <p>However, from a transport perspective any approach should not lead to development in locations that are not sustainable. See also response to Q24. Consideration should also be taken on the impact this may have on local schools and solutions to resolve this issue. For example, three small scale development sites contribute to the cost of delivering a new education facility as required to serve the new communities formed.</p> <p>LCC in its role as a landowner</p> <p>A significant proportion of such sites are likely to be windfall sites located within the limits of development and as such policy compliant. In such circumstances some landowners may not submit these sites to Call for Sites/SHELAA process and therefore go unaccounted for making the supply of such sites appear less than it is in reality. The development of the plan evidence base could seek to identify such sites to inform a policy on Small and Medium Sites.</p>
24	If you have promoted a site for development, would you consider sub-dividing the site to allow small and medium housebuilders or self-builders to enter the housing market?
	<p>Whilst this question is aimed at site owners or promoters, sub-dividing larger sites can stimulate a more diverse and competitive housing market and encourage innovation and can lead to more varied and community-focused developments, contributing positively to the local housing landscape. However from the Local Highway Authority's perspective any sub-division of larger sites would only be acceptable within a Local Plan policy framework that, at the least, allowed for the cohesive master-planning of the site as a whole and for 'sub-division' contributions to transport infrastructure and measures required to provide for the site as a whole. Otherwise, issues could arise, for example: an unsafe proliferation of site accesses; a failure to coordinate the provision of high quality on-site walking and cycling infrastructure; or failure to secure delivery of an attractive, passenger transport service to serve the site as a whole.</p> <p>Furthermore, going beyond the minimum 10% and/or sub-dividing larger sites would increase the potential need/value of bringing in a CIL (or implementing the Government's</p>

	<p>planned new infrastructure levy, depending on when this is due to come into force?) given the restriction on using S106 agreements for small and medium size sites.</p> <p>LCC in its role as a landowner</p> <p>This sub-division would only be realistic in circumstances where the two parts of the sites could be developed independently and there was no impact on the returns to the landowner.</p>
Site Selection Methodology	
25	Do you agree with the stages in the site selection methodology?
	<p>Broadly speaking, there are no particular issues with the methodology in principle. The site selection methodology stages are generally comprehensive; however, it is suggested that it incorporates more explicit criteria on sustainability and transportation links to ensure development aligns with strategic objectives, and takes on board minerals and waste safeguarding.</p> <p>However, please refer to response to Q12 and Q17 with regard to the Plan's preferred spatial strategy. Additionally, in terms of assessing viability, it is important to have as complete as understanding as possible (proportionate to the development of a Local Plan) as to the nature of infrastructure (transport or otherwise) required to enable the Plan's delivery. This is especially important if a spatial strategy were to be adopted that 'scattered' a relatively large number of smaller (non-strategic) sites across the district, which in turn gives rise to the need for transport infrastructure and measures to address cumulative and/or cross-boundary impacts and would likely be less sustainable overall in transport terms.</p>
26	Are there any other factors you think should be considered when selecting sites for development?
	<p>Yes, factors like climate resilience, the potential for renewable energy integration, and connectivity (both digital and transportation) should be considered to ensure sustainable and future-proof development. There should also be consideration of the need to maintain the sustainability of settlements for supporting community infrastructure such as a local primary school.</p> <p>Minerals safeguarding and waste safeguarding are important considerations, as is the capacity to manage and dispose of waste generated by any developments.</p>
Strategic Green Designations	
27	Do you agree the existing approach of using Green Wedges, Areas of Separation and Countryside designations to manage development?
	LCC agrees with the broad approach as it helps to maintain the balance between development and conservation of natural landscapes, crucial for sustainable growth and environmental protection, however see also the response to Q28.
28	Should the detailed boundaries of Green Wedge and Areas of separation be reviewed to take account of any new Local Plan allocations where appropriate to do so?
	The existing designations should be reviewed to ensure these designations remain relevant and effective in light of new developments and changing environmental conditions. Consideration should be given to balancing the delivery of sustainable development and the loss of green space. In reviewing green space designations more

	<p>certainty as to their extend is afforded where there are clearly defined limits of development.</p> <p>It is also considered that a review would be required in order to provide for the strategic scale development in accordance with the Strategic Growth Plan Housing Market Area spatial strategy. This might include, for example, to provide for transport infrastructure to access strategic sites and/or mitigate their transport impacts.</p>
Design Quality	
29	<p>Is preparing a district-wide design code, related to an updated design policy in the Local Plan, an appropriate approach?</p> <p>It is necessary for the local plan (and any subsequent SPD) to accord with statutory requirements and NPPF guidance in respect of a district wide design code, but broadly it is considered that having a district wide design code would facilitate a consistent and proactive approach to design standards and would mean high quality design practices would be carried out for all developments. It should, however, allow for some flexibility to adapt to local contexts and needs, especially in the Eastern villages.</p> <p>Design Codes should be developed in close collaboration with the likes of the Local Highway Authority to ensure that, where roads form part of new development, they are designed to adoptable standard so that they are safe and functional and are affordable in terms of future maintenance.</p> <p>Codes should of course take account of the character of an area but also the maintainability of future assets, particularly where they will be managed at public expense. When choosing appropriate designs: availability of materials for replacement as part of the maintenance cycle, durability, carbon implications etc all need to be considered.</p> <p>Design codes documents should refer to and accord with the Leicestershire Highway Design Guide (LHDG) and should state the need for developers to consult with the Local Highway Authority at an early stage in the design process. It might be considered that rather than a separate code, reference to the LHDG may for the most part be sufficient.</p> <p>Any approach should include consultation with Education Sufficiency, to ensure that school buildings compliment complement the wider community and to ensure that costs are secured for such additional requirements.</p>
30	<p>Do you consider further design codes to be necessary, if so, what should they cover? For example:</p> <ul style="list-style-type: none"> - Large development sites. - Locations / settlements identified for significant development. - Particular character areas such as town centres, village centres, suburbs. - Specific topics such as climate change and sustainable development.
	<p>Design codes need to recognise and complement the existing character of individual areas and settlements as detailed in NPPF paragraph 135.</p> <p>All schools will be required to suit LCC design specifications and policies and this will ensure schools are delivered in accordance with the Department for Education guidelines (current BB103, subject to change).</p>

	<p>Additional design codes could cover specific areas such as historic town centres, rural settlements, and large-scale developments. These codes can ensure contextual and sensitive designs that respect local character and heritage. Broadly, the Local Plan should have net zero considerations embedded throughout the plan.</p> <p>See also response to Q29.</p>
Mitigating and Adapting to Climate Change	
31	<p>Are there any other policy approaches to climate change issues that the Local Plan should consider?</p>
	<p>For Harborough's Local Plan, incorporating policies that address climate change is vital for sustainable development. The following policy approaches could be beneficial:</p> <ol style="list-style-type: none"> 1. Promotion of Green Infrastructure: Implementing policies that encourage the development and maintenance of green spaces, which can include parks, gardens, green roofs and urban trees. This approach not only enhances urban aesthetics and biodiversity but also plays a critical role in mitigating urban heat island effects and improving air quality. 2. Sustainable Urban Drainage Systems (SUDS): Integrating SUDS into planning policies is crucial. These systems effectively manage and treat surface water runoff, reducing the risk of flooding and improving water quality. SUDS can include features like permeable pavements, green roofs, rain gardens and constructed wetlands. 3. Community-led Renewable Energy Projects: Encouraging renewable energy initiatives at the community level, such as solar panel installations on public and private buildings, wind turbines and community-owned renewable energy facilities. This approach not only contributes to reducing carbon emissions but also fosters community engagement in climate action. In addition, there may be scope to include something that encourages developers to investigate district heating potential 4. Updated Strategic Flood Risk Assessment: Conducting an updated assessment to understand and plan for the changing flood risks due to climate change. This is crucial for making informed planning decisions, ensuring that future developments are resilient and adaptable to changing climate conditions and flood risks. <p>Further to the response to Q4 (Objective 2), it is suggested that consideration should be given to as to whether the Plan should also seek to support existing businesses in transitioning to zero emission vehicles. An example of this could be through Plan Policy provision for hydrogen fuelling hubs for HGVs, based on evidence developed by Midlands Connect.</p> <p>In addition, whilst the Building Regulations now make certain provisions for EV charge points to be provide as part of new development, it is suggested that policies could be included in the Plan to encourage the provision of EV charging 'hubs' or other forms of publicly available community facilities, both to service existing communities or new developments (e.g. to provide for visitor EV charging in residential developments or EV car clubs).</p> <p>There is also the potential for the Local Plan to recognise the role which minerals sites play in combatting climate change.</p>

Flood Risk	
32	Do you agree with the Council's intention to undertake an updated Strategic Flood Risk Assessment to feed into Local Plan preparation?
	Yes. The Lead Local Flood Authority support this action and have been engaged in the updating of the SRFA. An updated assessment reflecting national and local policy changes and events, is crucial for informed planning decisions, ensuring that future development is resilient to changing climate conditions and flood risks.
Water Supply and Wastewater Management	
33	Do you agree that understanding the water supply and wastewater capacity is important in preparing the Local Plan?
	Yes, it ensures that development is sustainable and does not strain existing water and wastewater infrastructure, aligning with LCC's priorities for sustainable development and resource management. This is an important consideration in preparing Local Plans in line with NPPF paragraph 20 which states that sufficient provision should be made for waste management, water supply, and wastewater. Notwithstanding the duties of statutory undertakers and Leicestershire County Council, planning positively for water supply and quality through the planning system is a requirement. This is reflected in the NPPG which also states what the considerations in plan-making should be in relation to water infrastructure, water quality and wastewater. This includes existing capacity and phasing of development in order to allow for further provision or improvements.
Biodiversity and Geodiversity	
34	Do you think agree with the proposed policy approach to biodiversity and geodiversity? Is there anything else we should be considering to enhance biodiversity?
	The proposed approach is generally supported, and biodiversity can be further enhanced by integrating green corridors and wildlife habitats within urban areas, and promoting biodiversity net gain in all developments. Biodiversity and geodiversity can often involve communities and schools within the local area. Any biodiverse plans must therefore take into account the future revenue costs which will be inflicted upon the school operators.
Heritage Assets and the Historic Environment	
35	Do you agree with the proposed approach to heritage assets and the historic environment?
	Broadly yes, preserving and enhancing heritage assets is crucial. The approach should also include measures for adaptive reuse of historic buildings and integrating heritage conservation into new developments. Paragraph 16.1 does not reference the significant contribution that archaeological remains, including buried evidence, earthwork remains (including extensive landscape features such as ridge and furrow) and the archaeological of historic buildings, make to the historic environment. It is recommended that '...', and in the archaeological remains they have left behind' is added to paragraph 16.1 (as below).

	<p>“The District has a rich and varied historic environment which helps us to understand the past. It is evident in the buildings and spaces and through the stories of the people who lived and worked in them, and in the archaeological remains they have left behind.”</p> <p>Paragraph 16.2 conflates historic and archaeological interest and should be separated with a comma.</p>
Healthy Communities	
36	<p>Which of the above options do you think should be pursued? Are there any other options?</p> <p>1) <i>Continue with the current approach of incorporating health and wellbeing with the other themes and issues explored in the Local Plan, such green infrastructure, open space and design codes.</i></p> <p>2) <i>Based upon evidence create a specific planning policy that encourages healthy lifestyles and improves the well-being of the communities in the District.</i></p>
	<p>On balance, the overall preference would be to pursue a hybrid approach to the two options. Having health and wellbeing as a ‘golden-thread’ thread running through the Plan, including in the overall vision, is crucial to effective integration and this should run alongside a specific policy incorporating Health Impact Assessments, as per point 17.6. This will help allow communities and families to thrive within the district.</p> <p>Delivery of active travel infrastructure and measures can contribute significantly to improving the health of our communities and we would be keen to discuss how the new Plan might help in terms of being able to cite it in future bids to Government for funding for active travel infrastructure and measures.</p> <p>Health Impact Assessments are a crucial tool in identifying the potential development of the impacts of developments. They help to assess the potential risk or benefits to health, ensuring that informed proactive measures can be taken to mitigate negative effects and maximise the health benefits. They are also associated with improving health outcomes and reducing inequalities.</p> <p>There has been agreement locally that the following types of development would require a Health Impact Assessment:</p> <ul style="list-style-type: none"> • On sites allocated for development in the adopted Development plan, identified by the District Council and the Leicestershire Public Health team • As well as sites that meet one of a list of agreed criteria, based on numerical thresholds and health need. This HIA scoping criteria is currently being discussed amongst partners and the Public Health team would very much like to work with the District to develop and embed these criteria when approved. <p>It is important that any policy should give clear guidance in respect of a requirement to provide health impact assessments and the form of any assessment.</p>
Blue-Green Infrastructure	
37	<p>Do you agree that the existing approach should continue to protect, improve and enhance strategic Blue-green infrastructure within the district?</p>
	<p>Yes, the existing approach is commendable, but it should also focus on expanding and connecting blue-green infrastructure networks.</p> <p>A policy on Blue-Green Infrastructure could include several key elements:</p>

	<p>1. Protection, Improvement, and Enhancement of Existing Blue-Green Infrastructure: The policy should aim to protect, improve and enhance the existing blue-green infrastructure within the district. This involves maintaining and upgrading current green spaces, water bodies, and related natural features to ensure they continue to provide environmental, social, and recreational benefits to the community.</p> <p>2. Expansion and Connection of Blue-Green Infrastructure Networks: The policy should focus on expanding and connecting existing blue-green infrastructure networks. This can be achieved by identifying and developing new green spaces and water bodies and by creating green corridors that link existing blue-green assets. This approach will help in creating a more cohesive and accessible network of natural spaces within the district.</p> <p>3. Community Engagement in Planning and Maintaining Blue-Green Infrastructure: The policy should also encourage more community involvement in the planning and maintenance of blue-green infrastructure. This could involve initiatives that enable local residents to participate in the design, development and upkeep of green spaces and water bodies. Community engagement can foster a sense of ownership among residents, leading to better-maintained and more valued blue-green infrastructure.</p>
38	Is there an alternative approach to Blue-green infrastructure?
	An alternative could involve more community engagement in planning and maintaining blue-green infrastructure, enhancing local stewardship.
Open Space, Sport and Recreation	
39	Based upon this updated evidence do you think we should continue with the similar approach set out in the adopted Local Plan and set standards in planning policies for open space, sport and recreation?
	<p>The principle of setting space standards based on latest evidence would provide certainty for developers and landowners in the consideration and development of development proposals and would therefore be supported. Continuing with a similar approach is therefore advisable, but with a greater emphasis on accessibility and inclusivity in recreational spaces.</p> <p>Open space, sport and recreation is important to families and local communities. This promotes good health and wellbeing within local communities. Such spaces could potentially be managed by local schools within the area and compliment the spaces available to form strong hubs for their communities. We would also advocate for the recommendations from Make Space for Girls park designs to be considered within this where possible.</p>
40	Is there an alternative approach that you consider to be more appropriate for open space, sport and recreation?
	An alternative approach could include creating multi-use recreational spaces that cater to a wider range of activities and age groups and sharing some open space for school and community use e.g. all weather pitches.
Local Green Space	
41	Should the new Local Plan identify new areas of Local Green Space or are they more appropriately identified through Neighbourhoods Plans?

	<p>The new local plan should outline the principles of designating Local Green Space in accordance with the guidance given in NPPF paragraphs 105 and 106 and should therefore <i>“be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or updated, and be capable of enduring beyond the end of the plan period”</i>. Accordingly, it may be appropriate to designating an area of Local Green Space as part of the development policy for individual allocations. The Plan should identify new Local Green Spaces to ensure appropriate coverage and consideration across the district and this should be complemented by Neighbourhood Plans and local community groups, where present, for local specificity.</p>
Affordable Housing	
42	How should the plan deliver the 254 affordable homes for rent per annum?
	<p>The plan should utilize a mix of strategies, including direct council provision, partnerships with housing associations, and requirements for developers to include affordable units in new projects.</p> <p>The consultation narrative recognises that the level of affordable housing as detailed in the HENA is potentially undeliverable given the level of housing proposed. In order to maximise the potential delivery housing numbers should, as a minimum, accord with at least Option B or move towards Option C (in Q7 above) with a 15-20% contingency. In addition, the plan should support the delivery of appropriate 100% affordable housing sites and the development of exception sites.</p>
43	Should Council look to discount the proportion of affordable home ownership dwellings to reflect the scenarios set out above? If so, how should it be discounted?
	Any discounts considered should be based on a realistic assessment of market conditions and the effectiveness of existing affordable homeownership schemes, and recognise that it could potentially distort the assessment of overall need.
Mix of Housing	
44	Should the mix of sizes apply to all developments or only those over a set size threshold?
	It is considered that the mix of sizes should apply to those over a set threshold i.e. 100 dwellings. This would ensure that diverse housing options are available across most types of development, supporting a range of demographic needs whilst recognising exceptions e.g. in respect of small infill sites within the limits of existing settlements where the mix should reflect and compliment the character of surrounding area.
45	How should the plan deal with the demand for bungalows?
	It would be advisable to consider the local demographic trends, particularly the aging population, and the demand for accessible housing options such as bungalows. The plan could incorporate policies to encourage the development of bungalows where there is a demonstrable need and incorporating them into the master planning of sites using the principles of good design. Broadly, there should be a certain percentage of the dwellings built on a scheme.
Older Person and Specialist Housing	
46	Should the plan make specific site allocations for specialist housing, or require a proportion on sites over a specified size threshold?
	As a general principle specialist housing should be located with easy access to essential services (medical centres or shops for example) and are therefore best located adjoining

	village or neighbourhood centres. Each opportunity needs to be individually assessed however, as proximity to other community assets/resources and transport links are essential to understand before sites can be selected. Additionally demand does fluctuate over extended periods of time.
Accessible and Adaptable and Wheelchair User Dwellings	
47	Should all dwellings be required to meet the M4(2) standard (accessible and adaptable dwellings) and 10%-25% of homes be required to meet the M4(3) standard (wheelchair user dwellings)?
	Yes, the requirement for the delivery of homes to meet M4(2) and M4(3) standards should meet the requirements of current guidance unless it can be demonstrated that a greater need exists in the locality. Incorporating M4(2) and M4(3) standards into new developments can significantly enhance the accessibility and adaptability of housing stock, addressing the needs of a diverse and potentially aging population.
48	Should the approach to accessibility standards be different for market housing and affordable homes?
	No. The same accessibility standards would provide greater resilience in housing stock and ensure equitable access to suitable housing for all segments of the population. It would also recognise that tenure could change over the lifetime of a home.
Space Standards	
49	Should this Local Plan include a requirement to use the nationally described space standard?
	Yes, the space standards should be used to determine the minimum requirements. Incorporating these standards can ensure a minimum quality and size of living space, which is crucial for the well-being and comfort of residents.
Accommodation for Gypsies and Travellers	
50	How can the Council find sites to accommodate the need for Gypsy and Traveller pitches: a) Allocate sites for gypsy and traveller pitches as part of new employment land or housing developments? b) Regularise existing unauthorised sites? c) Extend existing sites? d) Create a new district or county council owned site? e) Other (please explain).
	It would be important for the council to undertake a comprehensive assessment to identify suitable locations, considering factors such as accessibility, community integration, and environmental impact. An accurate assessment of need should be ascertained in order to determine any shortfall in supply. The Authority needs to ensure that a wide variety of pitches are available (as in housing). This would require a plan that includes further provision of Socially Rented pitches as well as Privately owned/rented pitches. Historically there has been a steady flow of applications for private developments, however these have not always been in the most suitable locations and they do not always provide for all those in need from the Gypsy and Traveller Community. In respect of the options presented in this consultation a combination of options would be the preferred method. a) <i>Allocate sites for gypsy and traveller pitches as part of new employment land or housing developments?</i>

This is a very useful method of delivering suitable new pitches and has worked well in Charnwood where land availability is limited. However, given the timeframe for future housing and employment developments the delivery of any pitches identified in this way would potentially be some way in, or towards the end of the plan period. It should also be noted that whilst this method has been successful in identifying new Gypsy and Traveller sites in other parts of Leicestershire, the arrangement has been for the land to be made available (with services and planning permission) to the local authority for a socially rented site to be built, this essentially ensures that the sites will be built to an enhanced specification and managed to a high standard. This could also potentially be delivered by a registered social landlord in partnership with the local authority, which has been successfully achieved in Harborough in the past. It can't be left for developers to market.

b) *Regularise existing unauthorised sites?*

This can be helpful in reducing current demand as pitches on unauthorised developments are not included in current supply. Pitches provided in this way can meet immediate need quickly and provide a stopgap for longer term plans. These sites still need to meet the majority of the Criteria Based policy conditions though.

c) *Extend existing sites?*

This is not a one size fits all option. Careful consideration needs to be given to each potential location and the reason why an extension should be considered along with the potential impact it will have on the number of families needing a pitch. For example, a small family site of 2 pitches may want to extend a further 5 pitches to accommodate their own grown up children now they have their own families. This is a good example of meeting need where it arises. There have been many authorities nationally that have seen this as an easy option to discharge their entire need without considering the need for a variety of tenure, granting large numbers of pitches next to existing sites because the land was available without any real plan of who is going to occupy it (this has led to sites allocated for Gypsy and Traveller use being used to house the general population in caravans (unregulated mobile home parks) because they didn't need to use the land for their own families). There is a need for private rented pitches but these need to be closely monitored and appropriately licenced to protect residents, again each site considered will need to meet the conditions of the Criteria Based Policy.

d) *Create a new district or county council owned site?*

This option should certainly be in the mix as it is an option to ensure that a number of socially rented pitches are made available. Many previous Gypsy and Traveller Accommodation Needs Assessment studies have suggested that 20% of all provision should be socially rented. The development and running of these sites could be either District or County (the County Council currently run the local authority sites in Leicestershire and therefore have the experience) or by a RSL (there is one small site run by an RSL already in Harborough which has been successful). All the recent LA Gypsy and Traveller site developments have been relatively small in size 5-10 pitches, this has worked well and recommended for future developments.

	<p>e) <i>Other (please explain)</i></p> <p>This consultation doesn't mention Transit need but it should, given there is a huge need for local authority managed Transit sites in Leicestershire and broadly it has been identified that one in the north of the county and one in the south would help with accommodating unauthorised caravans when they stay in Leicestershire, this would put Harborough district in the ideal zone for locating a site. A Transit site would only need to be big enough to hold between 6 and 12 caravans and wouldn't necessarily be in use all year round, suitable land for Transit sites could be disused depots or car parks, or car parks in use but under utilised.</p> <p>Another consideration for land use for Gypsy and Traveller Pitches is conversion of existing housing stock into single Gypsy and Traveller pitches, where the property becomes the amenity block and the garden/driveway is large enough to accommodate a caravan, this would enable Gypsy and Travellers to live in appropriate accommodation without the need to allocate land specifically for the purpose what these families would lack is the support from other families that they get on sites and many Travellers would say that this is not much of an improvement from living in a house, it should be considered though as it could be a good compromise for some families.</p>
51	<p>If we need to allocate sites for new pitches, what size of site should we be seeking to allocate?</p>
	<p>Broadly, the size should be determined based on the projected need, available land, and the capacity to provide necessary infrastructure and services.</p> <p>For Socially Rented sites it has been well documented that small family sites have worked better than large multifamily sites. Small family sites tend to be 2-6 pitches but sites up to 10 can still be occupied by groups that are closely related. Financially, sites of 5 pitches or more are more viable, if locations can be found for larger sites and the need is identified multiple family sites of between 10-15 pitches are manageable but will cost more to run.</p>
Self-build and Custom Housebuilding	
52	<p>How should the Local Plan address meeting demand for self-build and custom housebuilding?</p>
	<p>It would be beneficial for the Local Plan to support diverse housing types, including self-build options, to meet varying needs and preferences within the community. The Local Plan should use the existing Register to assess the likely demand for self-build houses over the period to 2041 and assess the shortfall measured against current commitments and the historic take up of self-build opportunities. A policy can then be developed with a view to balancing supply and demand with a contingency to allow flexibility.</p>
53	<p>Should large sites be required to provide a percentage of their plots as serviced plots for self-build?</p>
	<p>Requiring a percentage of large sites to offer serviced plots for self-build could stimulate diversity in housing options and encourage individual and small-scale developers, however it may not always be appropriate or reflect demand. Should a small proportion of serviced self-build plots on larger sites be required, it could be subject to the proviso that should they not be purchased and built out within a specific time frame they can revert back to normal market development</p>

	See also response to Q24, should the percentage of plots for self-build and custom housebuilding be significant.
54	Should the plan make site specific allocations for self-build and custom housebuilding? Site-specific allocations could provide clarity and certainty for self-build and custom housebuilding, fostering this sector of the housing market, however it could also cause disruption to the build-out process and may not necessarily meet the wishes of self and custom housebuilders. Applicants could instead be encouraged to include provision on sites where a demand has already been identified. It is recognised that some neighbourhood plans already make such a provision caveated as per Q53 above. However, it is likely that a proportion of self-build houses will be brought forward by windfall sites. It may therefore make sense not to make any additional provision by making further specific allocations. See also response to Q24, should the percentage of plots for self-build and custom housebuilding be significant.
55	Should the Council decide to introduce a Local connection test, is the Local connection test set out above suitable to use for the Self-build and Custom Housebuilding register? Implementing such a test could ensure local needs and connections are prioritised in housing developments. If the local connection test was introduced the test as detailed would appear appropriate.
56	Does the Council have strong justification to introduce the local connection test? Such a test could be justified if it aligns with local housing strategies and the need to prioritise housing for those with a strong local connection. It might provide reassurance to local communities if the location connection test is implemented.
Town Centres, Retailing and Leisure	
57	Do you agree with the proposed approach to supporting town and village centres? Broadly speaking, yes. Supporting these centres is aligned with LCC's broader strategic objectives of balanced growth and sustainable development. It is also supported given the importance of attractive, well-functioning town centres (existing or new as may emerge in respect of strategic scale development over the lifetime of the Plan), in terms of minimising the need for external travel to other places (especially by car). However, with regard to responses to: <ul style="list-style-type: none"> • Q9 and Q14, there is the potential need for the approach to supporting town and village centres to have a longer-term perspective sufficient to consider how the roles of specific centres may emerge or evolve as the pivot to the SGP distribution takes place; and flowing on from that with regard to the response to • Q10 and how that evolution might impact on settlement hierarchies as part of a more 'poly centric model' of retail and leisure provision serving growth across the Housing Market Area. Where a town or village centre is seen to be in decline consideration should be given to the provision of additional housing within the locality with a view to maintaining footfall and the vitality of the centre.
Tourism	

58	Do you agree that the new Local Plan should encourage tourism and the growth in visitor numbers?
	<p>The Local Plan should encourage tourism and growth in visitor numbers where it would be beneficial for local economic development and where it can be done so sustainably. Visitor attractions need to be managed to avoid detrimental impact on local communities and the environment.</p> <p>Any policy approach should at least contain a criterion related to accessibility by active and sustainable modes of transport and also include electric vehicle charge point provision.</p>
Transport	
59	<p>Which of the above options or option do you think should be followed in the new Local Plan? Are there any other options to consider?</p> <p><i>Option A: Continue with the approach in the current Local Plan which recognises the rural nature of the District and encourages more sustainable transport modes whilst acknowledging that private cars have an important role for residents.</i></p> <p><i>Option B: Promote policies that actively encourage sustainable transport.</i></p> <p><i>Option C: Allow for development and accept that junctions and links will continue to operate above capacity.</i></p>
	<p>In many ways, these are an artificial set of options, not least because fundamentally any Local Plan has to deliver sustainable development in accordance with the National Planning Policy Framework (NPPF).</p> <p>With regards to Options A and B, these do not really appear to be separate approaches; as per the above comment, there should always be a sustainable first approach but the extent to which realistic sustainable measures can be identified and delivered in practice is dependent on the specific circumstances. In that regard, it is difficult to divorce a response to this question from matters relating to the Plan's spatial strategy. For example, rural areas around the south and east of the City of Leicester are currently poorly served by active and sustainable travel modes; but the delivery of strategic scale development in this area, in accordance with the Strategic Growth Plan Housing Market Area spatial strategy, would offer the opportunity to deliver transformational change in this regard and also to deliver 'true' new communities with a significant range of facilities and services that thus minimise the need for external travel.</p> <p>A mixture of Option A and B would seem most logical, recognising the need for and actively promoting sustainable transport as much as possible whilst recognising a need for private car use.</p> <p>Option C appears to suggest a more 'laissez-faire' approach. The risk with this option is that it is likely to lead to poorly accessible and therefore unattractive sites and/or negative feedback of increased traffic problems adversely impacting sustainable travel opportunities, e.g. heavily congested routes are less attractive to/safe for active travel (cycling and walking) and cause increased passenger transport delays/journey times, leading to even more car journeys and thus (in essence / reality) development that would be contrary to the NPPF.</p> <p>Any option followed should include consideration of safe walking routes to and from local community facilities, provision of suitable transport links and sufficient parking. It should effectively plan such elements around local community hubs, inclusive of education</p>

	<p>provision – new or existing. It should also follow a joint working approach when identifying impact on local education establishments, both existing and new proposals.</p> <p>See also response to Q60.</p>
Local Services and Infrastructure	
60	<p>Which of the above approaches to infrastructure delivery do you prefer? Are there any other options that could be considered?</p> <p><i>Option A: Continue with current approach of seeking on-site provision and financial contributions to a wide range of infrastructure where new development requires the provision.</i></p> <p><i>Option B: Prioritise infrastructure.</i></p> <p><i>Option C: Focus new development on areas where there is existing capacity or certainty about the delivery of infrastructure improvements.</i></p>
	<p>An approach to the delivery of infrastructure which draws on all three options (seeking on-site provision and financial contributions to a wide range of infrastructure where new development requires provision, prioritising scarce financial resources towards key infrastructure, and focusing new development on areas where there is existing capacity or certainty about the delivery of infrastructure improvements) is likely to be the most realistic and practical approach; particularly bearing in mind that the spatial strategy chosen for the new Local Plan will influence the approach to infrastructure delivery.</p> <p>Note it is difficult to divorce a response to this question from matters relating to the Plan’s spatial strategy. Notwithstanding the above, in many ways, these are an artificial set of options, as there isn’t in practice any choice to be made between them. In particular:</p> <ul style="list-style-type: none"> • Option A - appears to be the approach that any local plan should/must take in the first instance – i.e. if there is an identified infrastructure/service gap, it needs to be on the list of things to be addressed. • Option B - is a normal approach to be applied in the consideration of, inter-alia, the scale of service and infrastructure provision required to support growth Vs. considerations of a Plan’s viability. • Option C - In practice, not least from a transport perspective, areas where there might be existing ‘localised’ spare highway capacity are likely to be in relatively more remote areas away from the main settlements / key places of service provision. Thus, such places are unlikely to be sustainable locations in transport terms giving rise to car borne trips with the potential to create cumulative and/or cross boundary impacts which can be complex and challenging to seek to mitigate. <p>From a wider perspective, another issue with Option C could well be that there are very few places with ‘spare’ educational capacity and those that do have any (or are likely to be able to provide for increased capacity) are likely to be the larger scale site in the main settlements/key service centres, so there is a tension here.</p> <p>Prioritising infrastructure (Option B) works well in Melton Borough (further details can be provided). Viability increasingly threatens our ‘asks’, an approach with Harborough District Council to prioritise contributions towards infrastructure would help mitigate the impacts of viability.</p> <p>A hybrid solution will probably be most appropriate in order to ensure that all communities have the necessary infrastructure to meet their future everyday needs with</p>

strategic developments delivering the needs of the new community in a way that compliments existing provision locally and smaller developments providing the necessary funding to enhance existing provision. Prioritising funding can have a negative impact and place an unequal burden on service providers delivering services perceived to be of lesser importance to the community but may have a limited place in the delivery of major infrastructure or strategic changes in service delivery.

From an education perspective Option A/B. Education infrastructure will be required to accommodate the developments proposed within the local plan.

It is requested that whichever infrastructure option is chosen, the School Organisation Team is involved in early discussions regarding site selection to ensure the most appropriate solution for education is achieved on an ongoing basis. That the delivery of school places is thoroughly planned and achieved, with a realistic funding stream to deliver school places.

It is also requested that the School Organisation Service remains a statutory consultee as and when planning applications are received.