

**Leicestershire County Council Further Response to the Proposed Submission Draft
(Regulation 19) Harborough Local Plan 2020 –2041 (March 2025)**

Important Note: Comments must be read in conjunction with the report to Leicestershire County Council’s Cabinet on 18 March 2025 – Response to Proposed Submission Draft (Regulation 19) Harborough Local Plan 2020-2041

<p><i>Any overarching comments</i></p>	<p>There is a TCPA recommendation to include clear definitions in all Local Plans that define health and health inequalities. Health and health inequalities should be defined and ‘set the tone’ for the health content of the plan. It is recommended that Local Plans and health focused planning policies define health using the World Health Organisation’s (WHO) definition: “Health is a state of complete physical, mental and social wellbeing and not merely the absence of disease or infirmity.” (WHO, 1948)</p> <p>There is also a TCPA recommendation to include reference to the <u>Leicestershire Joint Health and Wellbeing Strategy (2022-2032)</u> within Local Plans.</p> <p>From an education perspective, there is no mention of SEND contributions & requirements. Once the number of housing is confirmed, estimated costings can be provided on a case by case basis. This is to be completed upon planning applications being received & S106 responses being submitted.</p>
<p><u>Section</u></p>	
<p>Chapter 1: Introduction</p>	<p><u>Page 8, para 1.12 and para 1.13:</u> Under the Minerals and Waste development heading, there is no acknowledgement that minerals and waste safeguarding is important in the assessment, allocation and consideration of sites which is the responsibility of all local authorities, not just County Council (see LCC’s response to the Reg.18 (Section 6 – Duty to Cooperate and Effective Joint Working).</p> <p><u>Page 8, para 1.10:</u> The Statement in 1.10 that Neighbourhood Plans have been wholeheartedly embraced is agreed with. We welcome the inclusion of a section for NP at the end and section 1.15 which helps groups in using and understanding the LP specifically in relation to their work.</p>
<p>Chapter 2: About our District</p>	<p><u>Page 13, para 2.12:</u> It is suggested that a statement may be required to capture need for highways links to any new schools. The approach will be that all highways’ requirements are looked at during the initial masterplan design and planning process and that any additional highways infrastructure required to ensure safe crossing of access of the school is allowed for and planned for at the point that the highway plan is developed as part of the</p>

	<p>wider scheme. Therefore, all infrastructure is planned for in advance, with no retrospective plans or modification to the highway required. Any additional adaptations required to the highway to suit the needs of safe access and crossing to the school is to be met by the developer, not school construction costs.</p>
<p>Chapter 3: Our Development Objectives</p>	<p><u>Page 15, Tackling climate change and enhancing the natural environment:</u> No specific reference has been made to the circular economy in the tackling climate change objective and this is a missed opportunity.</p> <p>Suggest amended wording as follows: ‘Reduce carbon emissions and implement climate adaptation strategies <u>and a circular economy</u>. Improve the quality of the natural environment by reducing pollution, <u>reusing scarce resources</u>, protecting, enhancing, and extending biodiversity, and creating green infrastructure.’</p> <p>PPG for Waste states it is the responsibility of all planning authorities, not merely the Waste Planning Authority, to contribute to driving waste up the waste hierarchy.</p> <p>Suggest Leicestershire County Council and the Leicestershire Minerals and Waste Local Plan are also added to paragraph 3.5</p> <p>The ‘Retaining and celebrating our heritage and rural character’ objective could include reference to Harborough’s tourism offer.</p> <p><u>Comments from LCC as a landowner:</u> The Development Objectives are supported with the first, second and fifth seen as particularly relevant to the County Council as a landowner.</p>
<p>Part 1 Our Spatial Strategy to Meet Development Needs (Strategic Policies)</p>	
<p>Chapter 4: Overall Development Strategy</p>	<p>This local plan is being prepared through the transitional arrangements for plan-making set out in the new NPPF (Dec 2024), this means the local plan will be examined within the framework provided by the NPPF (Dec 2023), and the overall scale of housing provision to be provided for will be lower than the Proposed Standard Method figure for Harborough district indicated in the accompanying document to the new NPPF.</p> <p><u>Policy DS01</u></p> <p>The scale of proposed housing provision accords with the Leicester and Leicestershire Statement of Common Ground on Housing and Employment Needs (June 2022) which for Harborough District sets out the provision of 657 dwellings per annum.</p>

For the subsequent round of plan-making when the new Standard Method will apply an increase in the scale of housing provision with associated essential strategic infrastructure is highly likely to be required, the lead-in time for which mean indicative requirements for strategic infrastructure ideally need to be indicated within this emerging Local Plan.

The identification of strategic clusters is supported, within the Priority Growth Corridor it is envisaged the spatial pattern will link to the spatial pattern to emerge in Blaby District's new Local Plan and onwards in Hinckley and Bosworth Borough's new Local Plan.

The role of Lutterworth, which is identified as an area of managed growth in the Strategic Growth Plan, is not as strong as anticipated. It is noted that this is to reflect the number of homes already permitted in recent years, including the East of Lutterworth Strategic Development Area allocated in the adopted Local Plan. Nonetheless, given the range of services offered and position in the settlement hierarchy alongside Market Harborough, further allocated growth at this settlement is considered appropriate.

Policy DS01, page 21, para 2 d): Typo - Husbands Bosworth

Policy DS01, page 22, para 4.7: Within paragraph 4.7 there is potential for a hook into the SGP with reference to Leicester as the 'central city' (i.e. providing commercial and cultural opportunities, jobs and services).

Policy DS03, page 34, para 1 c): Wording needs amending as follows:

d) Contributes to the delivery of the national Nature Recovery Network and Leicestershire, Leicester and Rutland **Local** Nature Recovery Strategy through the delivery of Biodiversity Net Gain in accordance with Policy DM10;

Also, on 19 Feb the government released new guidance on the role of LNRS in planning. See below for more details:

Today the Natural Environment section of [planning practice guidance](#) on GOV.UK has been updated and expanded to include guidance on the role of LNRSs in planning.

This guidance explains how local planning authorities (LPAs)

should interpret their legal duty to “have regard” to LNRs and how LNRs should be used to help meet existing national planning policy on protecting and enhancing biodiversity. We encourage RAs to please read and share this guidance with your supporting authorities. Some of the key points to highlight from the guidance include:

- **For local plan development:** *“Local planning authorities should be aware of those areas mapped and identified in the relevant Local Nature Recovery Strategy and the measures proposed in them and consider how these should be reflected in their local plan. In doing so, they should consider what safeguarding would be appropriate to enable the proposed actions to be delivered, noting the potential to target stronger safeguarding in areas the local planning authority considers to be of greater importance. This will enable local planning authorities to support the best opportunities to create or improve habitat to conserve and enhance biodiversity, including where this may enable development in other location.”*
- **For planning decisions:** *“The Local Nature Recovery Strategy is an evidence base which contains information that may be a ‘material consideration’ in the planning system, especially where development plan documents for an area pre-date Local Nature Recovery Strategy publication. It is for the decision-maker to determine what is a relevant material consideration based on the individual circumstances of the case. In cases where there is a draft Local Nature Recovery Strategy that has been consulted upon but not yet finalised and published, the draft strategy may contain useful evidential information that can support appropriate decision making.”*

LCC does not currently have plans to build further waste infrastructure in the county. It is not possible to know the future impact on capacity at the RHWS sites and considerations of future changes would always need to be taken into account. However, at the appropriate time there would be a subsequent need for LCC and the council to work effectively together to manage the future need for additional waste infrastructure.

Policy DS04: Alongside landscape character types and area and heritage assets, it would perhaps useful to also include a map of Green Wedge designations.

Policy DS05, page 41, para 4 a): 4. *New development should be supported by, and have good access to infrastructure: a) Proposals for new or extended school facilities will be expected to relate well to the communities and population they serve, ensuring they are accessible. Developer contributions are likely to require education provision where there is a demonstrated shortfall in capacity – It should be noted that this issue is to be covered through the Highways or safer school travel or equivalent. This is not an educational responsibility. We wish to emphasise the need for access to schools to be part of the wider development plan or consideration for adaptations required with costs associated by the relevant team during the initial stages of planning.*

Policy DS05: Specific mention could be made of improvements to waste infrastructure where required.

Policy DS05: Opportunity to mention climate resilient specification of green space/planting and also something about aftercare of green space to ensure continued provision of the listed benefits.

Policy DS05, page 40: In reference to this policy, Development Strategy: Supporting Strategic Infrastructure - Leicestershire County Council (LCC) is the waste disposal authority and therefore has responsibility for Local Authority Collected Waste (LACW). It also provides Recycling and Household Waste Site (RHWS) capacity.

LCC does not currently have plans to build further waste infrastructure in the county. It is not possible to know the future impact on capacity at the RHWS sites and considerations of future changes would always need to be taken into account. However, at the appropriate time there would be a subsequent need for LCC and the council to work effectively together to manage the future need for additional waste infrastructure.

Policy DS05, page 43, para 4.52, bullet three: The word 'hotspots' should be replaced with 'areas'.

Comments from LCC as a landowner:

Policy DS01:

- It is noted that the housing numbers for the initial period 2010-36 accords with the Statement of Common Ground and thereafter reverts to the standard method

	<p>calculation. However, there appears to be no buffer to take account of the need for the plan to be both resilient and flexible to ensure that the required number of homes are delivered. This is particularly important when, as in the case of this plan the achievement of housing numbers both committed and planned is dependent on the delivery of strategic sites. Whilst, it is noted that total commitments and allocations is at 14,839 is 12.5% above the calculated need of 13,182, in relation to the examination of the current plan the Inspector considered a buffer of 15% to be appropriate to provide such flexibility. Further, the narrative to the affordable housing policy details that there is a current need to deliver 421 affordable homes per annum. The narrative goes on to suggest that this figure would be unattainable. To take account of the need to flexibility and maximise the potential to maximise the delivery of affordable housing the suggested housing numbers should be regarded as an absolute minimum.</p> <ul style="list-style-type: none"> • The Settlement Hierarchy is seen as logical as is the need to distribute housing number across the range of settlement sizes to maintain sustainability and the retention of community facilities. • The District Land Supply Position needs further explanation in order to provide comfort that the proposed level of homes is deliverable. In particular by not detailing the delivery from committed strategic sites over the plan period provides an incomplete picture and creates uncertainty. <p><u>Policy DS02:</u> The general thrust of the policy is supported. At para 2 b.) it is noted that site L3 at Lutterworth is included within the allocations being previously allocated in the current plan subject to the requirements of Policy SA01. The retention of the allocation is welcomed. In respect of para 4. – General Employment Areas – Whilst the basic policy is sound the inclusion of Courtyard Workshops in Market Harborough as a General Employment area is seen as illogical. Located within what is now a predominantly residential area, with which there continued use is incompatible, the premises are old and incapable of economic use in the medium term. Consideration should therefore be given to their redesignation as “other employment” premises.</p>
Chapter 5: Key Development Sites	<p><u>Policy SA01:</u> We welcome the recognition that design and layout of development on your allocated sites must be</p>

	<p>considered comprehensively with development at nearby sites, and especially the clusters of sites</p> <p>A) Scraftoft, Thurnby and Bushby – sites S1, S2 and TB1; B) Oadby and Great Glen – sites OA1 and GG1; and C) Market Harborough – sites MH1, MH2 and MH3.</p> <p>Site policy requirements should include minerals and waste safeguarding and incorporate the ‘agent of change’ principle where appropriate. Please see our separate comments on individual allocations.</p> <p><u>Policy SA01:</u> Proposed allocations MH1, MH2, MH3 and MH5 are all either immediately adjacent to one another or are located so close, that they would effectively function as a single urban extension. Combined they would lead to 1750 new dwellings and 5.6ha new employment land. In the case of the above allocations and also BA1 (475 houses) they are located close to waste sites identified in our waste safeguarding document.</p> <p><u>Policy SA01:</u> GG1 and OA1 effectively read as one very large urban extension/new settlement. The effects of this upon waste water and sewage provision as well as RHWS provision needs assessment and consideration.</p> <p><u>Policy SA02, para 6 e):</u> Wording update is required. The expansion of existing schools is required to meet the needs of the pupil yield generated from the size of this development, with land and monetary contributions. This is in addition to the new schools required, impacting on primary, secondary and post 16 phases of education.</p> <p><u>Policy SA03:</u> It is noted that draft Policy SA03: North of Market Harborough Strategic Development Area includes, at clause 2 (e)., a requirement for the provision of ‘retail, health and community infrastructure’. This is supported at paragraph 5.16 of the draft reasoned justification which acknowledges that ‘phased infrastructure provision is essential to avoid straining existing services’. It is noted that no reference is made to community waste management infrastructure (Recycling and Household Waste Sites) in either the reasoned justification or the main policy text. It is considered that the reasoned justification and policy text should be amended to make reference to community waste management infrastructure (Recycling and Household Waste Sites [RHWS]).</p> <p>Furthermore, in considering the specific policy requirements set out in respect of MH1, it is noted that sub-paragraph (d)</p>
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includes a requirement for developer contributions towards cross site infrastructure. It is considered that contributions towards RHWS waste management infrastructure should also be included in this list, particularly when the potential cumulative impacts associated with MH1, MH2 and MH3 (1700 new homes and 5ha additional employment land) plus proposed site allocation MH5 are considered. Development of this scale could have the potential to result in significant pressure on existing waste management provision in the area.

Policy SA03, para 3 k): Wording update is required. Please include that the developments within this area will be subject to cumulative impact to provide the land & monetary contribution, to deliver the required primary school, to meet the needs of the pupil yield generated through the new developments.

Developer of MH2 is to provide land for a secondary provision. Monetary contribution towards a new secondary school will be requested from all developments within the area, relative to the size of their development.

Policy MH1, para 4 e): Wording should be updated to remove 'cross site infrastructure' and be replaced with 'cumulative impact for primary education'. It needs to ensure it is clear that the S106 requirement for securing appropriate education contribution relates to both land and monetary.

Policy MH2: The site is also to provide a monetary contribution relevant to number of dwellings it is delivering. Developers across all three developments within MH North are required to contribute towards land and monetary costings.

Policy SA04 para 1 b): Wording needs to be updated to reflect the education contribution to allow for a monetary contribution in addition to the required land. It should refer to contributions required for new secondary provision. There are two new secondary schools planned for within the area of this development. Therefore, contributions will be requested for new secondary provision. The two new secondary schools where contributions will be used is either towards new secondary provision at the Oadby SDA or towards the new secondary located on the Thorpebury in the Limes development, located in the Charnwood district. Note – Thorpebury in the Limes is closer to the Scraftoft development than the Oadby SDA.

Comments from LCC as a landowner:

	<p><u>Policy SA01:</u></p> <ul style="list-style-type: none"> • Site L3 – Whilst the allocation is welcomed (see above) Policy SA01 restricts the use to E(g)(iii) uses. The site has been marketed extensively, without success, for a period of 10 years for office and light industrial uses and accordingly this restriction fails to recognise the fact that there is no market demand for light industrial uses at this location whereas there is market demand for B2 and B8 uses. It is therefore suggested that consideration be given to including the delivery of B2 and B8 uses thereby supporting the site's early delivery to meet market demand. • Site B2 – The allocation recognises the Neighbourhood Plan allocation and is welcomed. • Site U1 -The allocation is strongly supported.
Chapter 6: Strategic Policies for Housing	<p><u>Policy HN02:</u> The percentage of market and affordable homes being required to meet standard M4(3) is significantly less than what is suggested in the Leicester and Leicestershire Housing and Economic Needs Assessment (June 2022). Also appears to be no mention of nationally described space standards.</p> <p><u>Policy HN06:</u> The proposed policy HN06 is similar to the version in the currently adopted plan. Whilst the need for Gypsy and Traveller pitches seems on the low side considering that they have the largest population in Leicestershire, the numbers are accepted as they have an updated needs assessment. It appears the definition has been taken from the planning policy for Travellers Sites (PPTS) 2012 and not the revised version in the PPTS December 2024, however as all future applications will be determined by this definition and not the 2012 definition and so it would make sense to alter the policy to be in line with it now for the avoidance of doubt (the GTAA figures include 2 data sets to take this into account and it is mentioned separately in the policy).</p> <p><u>Policy HN06 para 3 a):</u> The land at Bonehams Lane is LCC land. There has never been any intention for LCC to extend the site although in theory it would be possible. Typically, small sites work better in relation to management and this particular site is a good example of a small site working. The location was not considered a great fit for the old plan policies due to it being out of town and next to the M1 (we argued an exception in this case). The location fitted the current occupants as they had lived roadside adjacent to the land for 20 years prior to the development. This point was made on the last plan as well but it was still included and it was agreed that the possibility should be assessed with the other sites in the Site Assessment</p>

document and there may be some good reason in the distant future for a very small extension but this would probably be outside of this plan period. It is therefore questioned why it should be mentioned in the policy at all and it may be more appropriate to just reference the Site Assessment Document which recommends a number of suitable sites. Whilst Bonehams Lane was included in the assessment as it is physically possible to develop, at the moment not practical for the reasons mentioned above.

There is mention of allocation for Showmen within Policy SA02 Land to the south of Gartree Road of 5 hectares a 5-10 pitch Gypsy and Traveller Site would only require 0.4 hectares and placing this within a larger development as part of a developer contribution has been very successful in delivering pitches for Charnwood BC (or will be in the next 5 years) these pitches could be delivered by the local authority or as Bonehams Lane by a RSL.

Policy HN06, para 4 d): The Good Practice Design Guide 2008 was withdrawn by DLUHC in 2015 so it would be unreasonable to require potential sites to meet them. Harborough District Council could create their own model standard for planning and site licencing purposes based on the old guidance however.

Policy HN06, para 6.38: It is recommended that this paragraph is re-written. Transit sites have always been a useful tool in which local authorities manage unauthorised encampments and as such they need to be developed in a way in which they can be used for this purpose. The sites need to be owned (or leased) and managed by the local authority (this can be District/County or Unitary) and the maximum stay needs to be at least 3 months. The facilities can be relatively basic however as a minimum the site would need hard standing and a water supply and toilets (even if these were portable) and waste disposal facilities. Most other policies within Leicestershire make mention of the joint protocols we have and the need to cooperate on a countywide basis to locate 1-2 strategically placed Transit Sites, broadly in the north and south of the county that can hold anywhere between 6-12 caravans. There has been a working party on and off since 2005 attempting to identify suitable locations, if all the local plans in Leicestershire reflect this need we may get one off the ground sometime in the next plan period. The paragraph goes on to mention Temporary Stopping Places and negotiated stopping. The countywide policy that we currently work from is essentially very similar to negotiated stopping and whilst we have no objection to

	<p>Temporary Stopping Places they are not a replacement for Transit Sites as we would not be able to direct Travellers to use them in law.</p> <p><u>Comments from LCC as a landowner:</u> <u>Policy HN01:</u> The thrust of the overall policy is supported. In particular, the policy recognises the challenges that viability presents in the delivery of affordable housing at a rate of 40% and provision is therefore made for viability to be taken into account to ensure deliverability which is welcomed.</p>
Chapter 7: Directing Development to the Right Place	<p><u>Policy AP04:</u> We welcome the recognition that Minerals and Waste development can be appropriate in the countryside.</p> <p><u>Comments from LCC as a landowner:</u></p> <ul style="list-style-type: none"> • <u>Policy AP03:</u> The development of Rural Exception Sites and the re-use of redundant buildings are both supported. • <u>Policy AP04:</u> The policy lists those uses that would be seen as appropriate development in the countryside which is vital to the vitality of the rural economy. In addition, consideration needs to be given to the provision of community infrastructure outside the limits of development where its delivery meets clear and demonstrable need. • <u>Policy AP05:</u> This is supported.
Part 2 Design of Developments and Management of Impacts (Development Management Policies)	
Chapter 8: Development Standards	<p><u>Policy DM01 para 2 a):</u> This should reference where planning dictates specific materials to be used. Above LCC standard design materials, an increased contribution will be required to meet the additional costs for specific materials requested and identified. For example, if a school was to be extended/newly built within a conservation area, an increased contribution to fulfil the requirement to suit.</p> <p><u>Policy DM05, page 132:</u> Comment previously provided on this policy was mistakenly listed under DS05 in the previous feedback. Therefore it is repeated here for clarity. It is suggested that point 1(a) of this policy also requires that the climate change resilience of new planting and green space be considered to ensure its longevity in the face of extreme weather and to ensure its maintenance is appropriate.</p> <p><u>Policy DM06, page 135, point 2:</u> It is suggested to move the wording of point 2 into the list of subpoints (a-e) to avoid confusion, since not all of the subpoints can be satisfied by a</p>

	<p>transport assessment. Some points such as (a), (c), (d) and (e) are items for master planners and architects at RIBA stage 1, not transport consultants at stage 2 or 3. This should be made clear in a re-wording and reprioritisation of point 2 and its subpoints.</p> <p>Secondly, it is recommended to strengthen the wording in points (a) surrounding the provision of cyclist and pedestrian infrastructure and (e) surrounding provision of EV chargers. Regarding the latter, it is suggested that this point should specifically state physical chargers rather than passive chargers. Part S of building regulations states that all new houses need to have at least one charger if there are more parking spaces than dwellings.</p> <p><u>Policy DM09, page 140:</u> Recommend removing requirement for HQM and BREEAM and replacing with the new UK NZCBS. This would simplify the policy as it applies to a large range of domestic and non-domestic buildings. It would also simplify the requirements, while maintaining a high standard of sustainable construction with embedded targets for energy consumption and whole life carbon emissions. If, however, life cycle assessment is desired via HQM and BREEAM then the specific credits should be referenced (6.2 and MAT01 respectively).</p> <p><u>Policy DM09:</u> This Policy provides opportunity for mention of the circular economy in both the supporting text and Policy itself. Also, conservation of precious primary minerals/resources by the re-use of materials as aggregate for example</p> <p><u>Policy DM09, page 140, para 1 c):</u> <i>Where demolition of existing buildings is required, demonstrate the reuse of demolition and construction waste;</i> consider amending wording to make it clearer that the use of this material could then be used to accommodate new builds. This would increase the effectiveness of the policy, whilst also making it consistent with the ambition of Government to establish and embed a circular economy, in line with the tests of soundness.</p> <p><u>Policy DM09, para 4:</u> The cost of BREEAM for schools builds will be treated as an abnormal cost. Therefore contributions required will reflect the additional amount required to meet BREEAM Excellent.</p>
Part 3 Implementing this Plan	
Chapter 9: Monitoring and Delivery	<u>Page 147, para 9.9:</u> It may be worth highlighting here our standard advice regarding Minerals Safeguarding Areas and waste infrastructure:

The County Council is the Minerals and Waste Planning Authority; this means the council prepares the planning policy for minerals and waste development and also makes decisions on mineral and waste development.

Although neighbourhood plans cannot include policies that cover minerals and waste development, it may be the case that your neighbourhood contains an existing or planned minerals or waste site. The County Council can provide information on these operations or any future development planned for your neighbourhood.

You should also be aware of Minerals and Waste Safeguarding Areas, contained within the adopted [Minerals and Waste Local Plan \(Leicestershire.gov.uk\)](#). These safeguarding areas are there to ensure that non-waste and non-minerals development takes place in a way that does not negatively affect minerals resources or waste operations. The County Council can provide guidance on this if your neighbourhood plan is allocating development in these areas or if any proposed neighbourhood plan policies may impact on minerals and waste provision.

Policy DM02, page 128, section 8.8: should be reworded to include HIA webpage from, ‘A template for HIA is currently being prepared, which will be available on Leicestershire County Council website, to support the assessment process and ensure consistent evaluation. The level of information required should be agreed with the Council in consultation with Leicestershire County Council and will be proportionate to the scale and nature of the development proposed.’ to ‘A Leicestershire Health Impact Assessment template has been produced by Leicestershire’s Public Health team available on <https://resources.leicestershire.gov.uk/health-and-wellbeing/health-impact-assessments> and will support the assessment process and ensure consistent evaluation.

Policy DM05, page 134, section 8.15: We would recommend the inclusion of ‘Value for Trees’ in relation to tree planting choices to maximise environmental and health benefits. Leicestershire County Council The Value of Trees (2023) Available from: <https://www.treeconomics.co.uk/wp-content/uploads/2023/01/Leicestershire-Value-of-Trees-Report.pdf>

In the ‘our reasons for this policy section we would recommend the inclusion consideration of safety for women and girls as

	<p>recommended by the Safer Parks Consortium and Make Space for Girls (The Safer Parks Consortium. Safer Parks: Improving access for women and girls [Internet]. The Safer Parks Consortium; 2023 Available from: https://eprints.whiterose.ac.uk/198874/</p> <p>Consider aligning the development of green infrastructure with broader public health goals, such as increasing physical activity levels, reducing obesity, and addressing mental health concerns. This could include designing green spaces that encourage active lifestyles (e.g., walking paths, cycling routes, exercise areas) and providing spaces for mental relaxation and social interaction.</p> <p>Consider prioritising the development and enhancement of green spaces in underserved and vulnerable communities, such as areas with higher levels of income deprivation, social isolation, and health inequalities. Ensure that these spaces are accessible to all, including the elderly, people with disabilities, and low-income families.</p> <p><u>Policy DM12, page 146. section 8.38:</u> could this allow for permission for hot food takeaway outlets? If so we would recommend considering adding restrictions around hot food takeaways/fast food outlets as per the NPFF 2024, section 97: “Local planning authorities should refuse applications for hot food takeaways and fast food outlets: a) within walking distance of schools and other places where children and young people congregate, unless the location is within a designated town centre; or b) in locations where there is evidence that a concentration of such uses is having an adverse impact on local health, pollution or anti-social behaviour”.</p>
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Site Allocation Comments

HH1	Allocation lies within sand and gravel consultation area. Mineral Assessment would be required as part of any forthcoming application to avoid unnecessary minerals sterilisation. No comments from a waste perspective.
HH2	HH2: Allocation lies within sand and gravel consultation area. Mineral Assessment would be required as part of any forthcoming application to avoid unnecessary minerals sterilisation. No comments from a waste perspective.
HB1	HB1: Allocation lies within sand and gravel consultation area. Mineral Assessment would be required as part of any forthcoming application to avoid unnecessary minerals sterilisation. Given proximity to known, and

	worked, sand and gravel deposits at Husbands Bosworth Quarry a thorough assessment to be undertaken and consulted with Leicestershire County Council is especially critical. No comments from a waste perspective.
U1	No comments.
U2	Allocation lies partially within sand and gravel consultation area. Mineral Assessment would be required as part of any forthcoming application to avoid unnecessary minerals sterilisation. No comments from a waste perspective.
OA1	<p>Allocation is not within a mineral safeguarding area. It also appears that the allocation crosses over into Oadby and Wigston District. Notwithstanding joint working, it is noted that the description of the proposal in Policy SA01 mentions 1,000 homes within Oadby and Wigston as part of the allocation. The Policy itself however can only allocate land within the boundary of Harborough District and therefore care needs to be taken with the mapping to avoid confusion. The Inspector will ultimately advise on the appropriateness of inclusion of areas outside the district on mapping.</p> <p>The allocation is adjacent to safeguarded waste sites Great Glen STW (H10), and Little Stretton STW (H18) as identified in S3/2015 and figure H2 as part of the LMWLP. This should be taken into consideration and 'agent of change' principle applies.</p>
TB1	Allocation is within and adjacent to a mineral safeguarding area for sand & gravel. Mineral Assessment would be required as part of any forthcoming application to avoid unnecessary minerals sterilisation. The allocation is close to safeguarded waste site Houghton on the Hill STW (H11) as identified in S3/2015 and figure H2 as part of the LMWLP. Intervening distance may be sufficient. 'Agent of change' principle applies.
S1	Allocation is within and adjacent to a mineral safeguarding area for gypsum. Mineral Assessment would be required as part of any forthcoming application to avoid unnecessary minerals sterilisation. We welcome the mention within the site allocation schedule of the need for a Minerals Assessment in accordance with Policy M11 of the Leicestershire Minerals and Waste Local Plan. No waste safeguarding issues.
S2	Allocation is within a mineral safeguarding area for gypsum. Mineral Assessment would be required as part of any forthcoming application to avoid unnecessary minerals sterilisation. We welcome the mention within the site allocation schedule of the need for a Minerals Assessment in accordance with Policy M11 of the Leicestershire Minerals and Waste Local Plan. The allocation is close to safeguarded waste site Keyham STW (H14) as identified in S3/2015 and figure H2 as part of the LMWLP. Intervening distance may be sufficient. 'Agent of change' principle applies.
GG1	The allocation is not within a mineral safeguarding area. The allocation is adjacent to safeguarded waste sites Great Glen STW (H10), and Little

	Stretton STW (H18) as identified in S3/2015 and figure H2 as part of the LMWLP.
MP1	Not within but adjacent to large MSA for sand & gravel. With intervening development including a pub, however, this part of the resource nearest Magna Park may be difficult to work. No waste safeguarding issues.
MP2	No comments as location yet to be identified. Allocation will need to take minerals and waste safeguarding into account.
MH1	<p>The site is not located in a mineral consultation area or close to any operational mineral sites. It is not considered that the proposed allocation would adversely affect the mineral safeguarding interest.</p> <p>The site is located relatively close (1.7km) to a strategic waste facility (H28), Welham Road, Great Bowden as identified in S3/2015 and figure H2 as part of the LMWLP. The waste facility (permission ref: 2014/0658/03) includes the bulking, storage and transfer of dry recyclable materials specifically paper, card, aluminium cans and glass. Policy W9 Safeguarding Waste Management Facilities of the LMWLP seeks to safeguard permitted waste management facilities from development which could prejudice the current and future operation of that waste facility. In this instance, due to the intervening distance between the proposed allocation and H28, it is unlikely that current/future operations would be compromised.</p> <p>The MWPA is aware of a proposal for an anaerobic digester on land at Welham Lane (planning application ref: 2024/00041/03) . Whilst this application currently remains undetermined, and has no weight at this stage, we are bringing it to your attention as a potential future consideration.</p>
MH2	<p>The site is not located in a mineral consultation area or close to any operational mineral sites. It is not considered that the proposed allocation would adversely affect the mineral safeguarding interest.</p> <p>At its closest point, allocation MH2 is located relatively close (1.36km) to a strategic waste facility (H28), Welham Road, Great Bowden as identified in S3/2015 and figure H2 as part of the LMWLP. The waste facility (permission ref: 2014/0658/03) includes the bulking, storage and transfer of dry recyclable materials specifically paper, card, aluminium cans and glass. Policy W9 Safeguarding Waste Management Facilities of the LMWLP seeks to safeguard permitted waste management facilities from development which could prejudice the current and future operation of that waste facility. In this instance, due to the intervening distance between the proposed allocation and H28, it is unlikely that current/future operations would be compromised.</p> <p>The MWPA is aware of a proposal for an anaerobic digester on land at Welham Lane (planning application ref: 2024/00041/03). Whilst this</p>

	<p>application currently remains undetermined, and has no weight at this stage, we are bringing it to your attention as a potential future consideration.</p>
MH3	<p>The site is not located in a mineral consultation area or close to any operational mineral sites. It is not considered that the proposed allocation would adversely affect the mineral safeguarding interest.</p> <p>The site is located approximately 3km to the west of an identified strategic waste management site (H28), Welham Road, Great Bowden as identified in S3/2015 and figure H2 as part of the LMWLP. In this instance, due to the intervening distance between the proposed allocation and H28, it is unlikely that current/future operations would be compromised.</p>
MH4	<p>The site is not located in a mineral safeguarded area or close to any operational mineral sites. It is not considered that the proposed allocation would adversely affect the mineral safeguarding interest.</p> <p>The site is not located close to any safeguarded waste management sites and is unlikely to adversely affect the waste safeguarding interest.</p>
MH5	<p>The site is not located in a mineral safeguarding area or close to any operational mineral sites. It is not considered that the proposed allocation would adversely affect the mineral safeguarding interest.</p> <p>The site is located approximately 2.6km to the west of an identified strategic waste management site (H28), Welham Road, Great Bowden as identified in S3/2015 and figure H2 as part of the LMWLP. In this instance, due to the intervening distance between the proposed allocation and H28, it is unlikely that current/future operations would be compromised.</p> <p>It is noted that the site effectively forms part of the wider North of Market Harborough Strategic Development Area. It is considered that the potential cumulative impacts associated with MH1, MH2, MH3 and MH5 (1700 new homes and 5.6ha additional employment land) and the potential implications for HWRC waste management infrastructure are considered as part of the plan process. Development of this scale could have the potential to result in significant pressure on existing waste management provision in the area.</p>
BA1	<p>The proposed site allocation is not located in a mineral safeguarding area or close to any operational mineral sites. It is not considered that the proposed allocation would adversely affect the mineral safeguarding interest.</p> <p>The proposed site allocation is located approximately 0.7km to the east of an identified strategic waste management site (H27), Sutton Lodge Farm, Frolesworth Road, Broughton Astley as identified in S3/2015 and figure H2 as part of the LMWLP. The facility was granted planning permission in 2010 (code ref: 2009/1488/03) and the waste planning authority is satisfied that the planning permission has been lawfully implemented. Lengthy issues relating to highway access have recently been resolved and it is understood that the</p>

<p>developer intends to proceed with the development.</p> <p>The operation of an AD facility of the type which has consent at Sutton Lodge Farm has the potential to result in impacts to amenity resulting from noise, dust and odour. There may also be landscape and visual impacts associated with the facility. Your authority needs to be satisfied that the proposed site allocation is capable of being planned and delivered in such a way that it would not compromise the future operation of the Sutton Lodge Farm AD plant. In this respect, the County Council in its role as Mineral and Waste Planning Authority wishes to bring to your attention the following policy constraints:</p> <p>Policy W9: Safeguarding Waste Management Facilities of the LMWLP seeks to safeguard permitted waste management facilities from development which could prejudice the current and future operation of that waste facility.</p> <p>Paragraph 8 of the National Planning Policy for Waste (2014) (NPPW) which states that: <i>'When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:</i></p> <ul style="list-style-type: none"> • <i>the likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;'</i> <p>Paragraph 193 of the National Planning Policy Framework (December 2023) states that <i>'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed'</i>. The proposed site allocation is not located in a mineral safeguarding area or close to any operational mineral sites. It is not considered that the proposed allocation would adversely affect the mineral safeguarding interest.</p> <p>The proposed site allocation is located approximately 0.7km to the east of an identified strategic waste management site (H27), Sutton Lodge Farm, Frolesworth Road, Broughton Astley as identified in S3/2015 and figure H2 as part of the LMWLP. The facility was granted planning permission in 2010 (code ref: 2009/1488/03) and the waste planning authority is satisfied that the planning permission has been lawfully implemented. Lengthy issues relating</p>

	<p>to highway access have recently been resolved and it is understood that the developer intends to proceed with the development.</p> <p>The operation of an AD facility of the type which has consent at Sutton Lodge Farm has the potential to result in impacts to amenity resulting from noise, dust and odour. There may also be landscape and visual impacts associated with the facility. Your authority needs to be satisfied that the proposed site allocation is capable of being planned and delivered in such a way that it would not compromise the future operation of the Sutton Lodge Farm AD plant. In this respect, the County Council in its role as Mineral and Waste Planning Authority wishes to bring to your attention the following policy constraints:</p> <p>Policy W9: Safeguarding Waste Management Facilities of the LMWLP seeks to safeguard permitted waste management facilities from development which could prejudice the current and future operation of that waste facility.</p> <p>Paragraph 8 of the National Planning Policy for Waste (2014) (NPPW) which states that: <i>'When determining planning applications for non-waste development, local planning authorities should, to the extent appropriate to their responsibilities, ensure that:</i></p> <ul style="list-style-type: none"> • <i>the likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities;'</i> <p>Paragraph 193 of the National Planning Policy Framework (December 2023) states that <i>'Planning policies and decisions should ensure that new development can be integrated effectively with existing businesses and community facilities (such as places of worship, pubs, music venues and sports clubs). Existing businesses and facilities should not have unreasonable restrictions placed on them as a result of development permitted after they were established. Where the operation of an existing business or community facility could have a significant adverse effect on new development (including changes of use) in its vicinity, the applicant (or 'agent of change') should be required to provide suitable mitigation before the development has been completed'.</i></p>
B1	Proposed allocation does not lie within an MCA (Minerals Conservation Area) and thus does not require a Minerals Assessment. Furthermore, there are no concerns from a waste safeguarding perspective.
B2	Proposed allocation does not lie within an MCA and thus does not require a Minerals Assessment. Furthermore, there are no concerns from a waste safeguarding perspective.

B3	<p>Proposed allocation does not lie within an MCA and thus does not require a Minerals Assessment. Furthermore, there are no concerns from a waste safeguarding perspective.</p>
GB1	<p>Both proposed allocation sites GB1 and GB2 are located entirely within a Mineral Safeguarding Area for sand and gravel as identified on Map S3/2015 of the Leicestershire Minerals and Waste Local Plan (2019-31) (MWLP) and Policy M11 outlines that mineral, including sand and gravel, will be protected from permanent sterilisation by other development.</p> <p>Therefore, we recommend that a Minerals Assessment is undertaken in line with Policy M11 of the MWLP to support any allocation of these sites in new policy, ensuring that the mineral is not needlessly sterilised by future development.</p> <p>Both sites are also within close proximity to three existing permitted waste safeguarding sites, allocated under references H22, H23 and H28 as identified on Map S3/2015 of the MWLP. The future use of these waste sites and associated infrastructure could be constrained if sensitive developments such as the proposed allocations are permitted nearby as it may prejudice the sites' ability to comply with their permitted planning controls, for example with set noise and odour limits.</p> <p>Having regard to the particular characteristics of the existing waste operations the LPA should be satisfied that it can be demonstrated that there would be no impacts to the amenity of development in this location or that the proposed development would prejudice continued operations at these waste facilities.</p> <p>Finally, it would be prudent to reference that Leicestershire County Council are currently going through the application process for a potential new anaerobic digestion facility (application reference: 2023/CM/0053/LCC) which would also be in close proximity to both of these proposed allocations. Whilst we are unable to offer direct comment from a waste safeguarding policy perspective, future applications should be cognisant of this current application.</p>
GB2	<p>Both proposed allocation sites GB1 and GB2 are located entirely within a Mineral Safeguarding Area for sand and gravel as identified on Map S3/2015 of the Leicestershire Minerals and Waste Local Plan (2019-31) (MWLP) and Policy M11 outlines that mineral, including sand and gravel, will be protected from permanent sterilisation by other development.</p> <p>Therefore, we recommend that a Minerals Assessment is undertaken in line with Policy M11 of the MWLP to support any allocation of these sites in new policy, ensuring that the mineral is not needlessly sterilised by future development.</p> <p>Both sites are also within close proximity to three existing permitted waste safeguarding sites, allocated under references H22, H23 and H28 as</p>

	<p>identified on Map S3/2015 of the MWLP. The future use of these waste sites and associated infrastructure could be constrained if sensitive developments such as the proposed allocations are permitted nearby as it may prejudice the sites' ability to comply with their permitted planning controls, for example with set noise and odour limits.</p> <p>Having regard to the particular characteristics of the existing waste operations the LPA should be satisfied that it can be demonstrated that there would be no impacts to the amenity of development in this location or that the proposed development would prejudice continued operations at these waste facilities.</p> <p>Finally, it would be prudent to reference that Leicestershire County Council are currently going through the application process for a potential new anaerobic digestion facility (application reference: 2023/CM/0053/LCC) which would also be in close proximity to both of these proposed allocations. Whilst we are unable to offer direct comment from a waste safeguarding policy perspective, future applications should be cognisant of this current application.</p>
MH6	<ul style="list-style-type: none"> • Located south of Market Harborough • Employment Use allocation site • Not located within a Mineral Safeguarding Area • No waste sites located near the allocated site • No comments from mineral & waste safeguarding perspective
MH7	<ul style="list-style-type: none"> • Located in centre of Market Harborough • Retail Use allocation • Not located in Mineral Safeguarding Area or close to Waste sites
MH8	<ul style="list-style-type: none"> • Located in centre of Market Harborough • Retail Use allocation • Not located in Mineral Safeguarding Area or close to Waste sites
L1	<ul style="list-style-type: none"> • Located north of Lutterworth • Housing allocation site • Not located in Mineral Safeguarding Area or close to Waste sites
L2	<ul style="list-style-type: none"> • Located SE Lutterworth, adjacent to J20 of M1 • Housing allocation site • Located in Mineral Safeguarding Area for Sand & Gravel • Located <1km from both Lutterworth East development and proposed new Misterton Quarry. Impact on these developments will need to be considered • Mineral Assessment required for new development
L3	<ul style="list-style-type: none"> • Located SW Lutterworth, adjacent to J20 of M1 • Employment Use site • Located in Mineral Safeguarding Area for Sand & Gravel • Previous approval for drive-thru restaurants (Ref. 22/01318/FUL) – LCC did not raise any objections regarding mineral sterilisation

	<ul style="list-style-type: none"> No waste sites close to allocation
F1	F1 & F2 are not within an MSA. There is a STW in Fleckney, but I wouldn't class the two locations in relation to it as a safeguarding issue.
F2	F1 & F2 are not within an MSA. There is a STW in Fleckney, but I wouldn't class the two locations in relation to it as a safeguarding issue.
K1	Not within an MSA. No waste safeguarding issues.
K2	Not within an MSA. No waste safeguarding issues.