

Tugby and Keythorpe Neighbourhood Plan

Pre submission consultation responses

| No. | Chapter/ Section | Policy Number | Respon dent | Comment | Response | Amendment |
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| General comments | General comments | General comments |  Tugby Resident 1 | <p>Pat & I thought it was exceptional, thank goodness the new PC was in charge.</p> <p>> I know you paid for expert help (absolutely right) but the effort that everyone on the various committees put in has obviously been outstanding.</p> <p>Nothing to do with the plan and I am sure you have thought about it. It is probably a non starter BUT it would be lovely to have a walk around the top part of the village, with possible new houses going in at Harbrook Farm it would be perfect. If it went from Chapel Lane, around Pick's Pond and then round to link up with the Rolleston footpath somewhere below the Village Hall. It would be a wonderful asset with wild flowers etc to be really ECO friendly. A little project for the future - which I am sure you have in mind.</p> <p>></p> <p>> Well done Everyone involved.</p> <p>></p> | Thank you for this comment. | None |
| 48 | Flood risk resilience | 5.9 |  Tugby Resident 1 | <p>> 1. Just out of interested, I have just renewed my house insurance and in discussions some comment was made about flood risk. I laughed and said we had been here for over 20 years and there has been no sign of any floods. Obviously Figure 15 shows that Spinney Nook has been identified as a risk. I suppose I can understand it - but very odd.</p> | Noted | None |
| 60 | Electric vehicles/ communit y sustainabi lity | |  Tugby Resident 1 | <p>2. On page 60 Electric Vehicles. There is a funny little symbol after the first 2 words. Also I believe the Government have now brought forward the date of cessation of sale of petrol & diesel cars to 2030 not 2040. In addition the Tugby Orchard Business Centre have already installed 4 electric vehicle charging points and they are available for all to use. These are at the far end of the site away from the road and well hidden. I have no</p> | Thank you for pointing this out. We have removed the symbol at the start of the paragraph and changed the date to 2030. | Change to be made as indicated. |

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| | | | | idea on type or costs. Brian Jordon certainly said they were there to be used. | | |
| 15-16 | Residential Allocation | H1 | Leicestershire County Council | <p>Leicestershire County Council is supportive of the Neighbourhood plan process and welcome being included in this consultation.</p> <p>Highways Specific Comments POLICY: Residential site allocation - Land is allocated at Harbrook Farm for residential development as shown in figure 2 below. Development will be supported subject to the following planning conditions being met: i) A footpath and vehicular link will be constructed to Leicestershire County Council's adoptability standards to Main Street to serve the site; It is unclear which footpath is being referred to here, but it is assumed a vehicular access with an adjacent footway leading into the development. Nevertheless, the Leicestershire Highways Authority would assess the site on its own merits, should a proposal be submitted for pre application advice or formally. The site access will need to be designed in accordance with the Leicestershire Highway Design Guide (LHDG) to ensure a safe and suitable access can be delivered in accordance with the National Planning Policy Framework (NPPF).</p> | <p>Noted</p> <p>Noted. We will change the reference to the LHDG for clarity</p> | <p>None</p> <p>Change to be made as indicated.</p> |
| P58 | Community sustainability | | Leicestershire County Council | <p>Page 58 - A47 Dividing the village of Tugby is the A47. There is a crossroads, which facilitates turning into the village on either side. Other villages off the A47 have right turn filters but Tugby does not. A previously mentioned, signage is relatively poor and there is real danger of cars turning right being hit by both following and oncoming vehicles. Crossing the A47 from one side of the village to the other is even more difficult and dangerous. If there is further significant development on either side of the road, an improved and safer crossroad junction must be a part of it. It should be noted that a new development should only mitigate its own residual impact; it cannot be expected for developers to mitigate existing concerns. The LHA would normally expect development proposals to comply with prevailing relevant national and local policies and guidance, both in terms of justification and of design. The request for any improvements to the crossroads junction would also need to meet all the tests as set out in</p> | <p>Noted. The narrative in the neighbourhood plan, referred to in the comments here, identifies the issues that are of concern as an aid to any solution.</p> <p>We will add in a community action to support action to resolve these issues.</p> | <p>None</p> <p>Change to be made as indicated.</p> |

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| | | | | regulation 122(2) of the Community Infrastructure Levy Regulations. | | |
| General comments | General comments | General comments | Historic England | <p>Thank you for consulting Historic England about your Neighbourhood Plan.</p> <p>The area covered by your Neighbourhood Plan includes a number of important designated heritage assets. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.</p> <p>If you have not already done so, we would recommend that you speak to the planning and conservation team at your local planning authority together with the staff at the county council archaeological advisory service who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (www.heritagegateway.org.uk <http://www.heritagegateway.org.uk>). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.</p> <p>Historic England has produced advice which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:-</p> <p><https://historicengland.org.uk/advice/planning/plan-making/improve-your-neighbourhood/></p> <p>You may also find the advice in “Planning for the Environment at the Neighbourhood Level” useful. This has been produced by Historic England, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources</p> | This general advice is noted. | None |

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| | | | | <p>of information. This can be downloaded from:</p> <p><http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf></p> <p>If you envisage including new housing allocations in your plan, we refer you to our published advice available on our website, “Housing Allocations in Local Plans” as this relates equally to neighbourhood planning. This can be found at <https://content.historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/heag074-he-and-site-allocation-local-plans.pdf/></p> | | |
| General comments | General comments | General comments | Fisher German - on behalf of the Trustees of the John Pick Will Trust | <p>These representations have been prepared on behalf of the Trustees of the John Pick Will Trust in respect of their land interests at Wood Lane, Tugby (see Figure 1 below). Figure 1: Site Location Plan 1.2 The land at Wood Lane has previously been promoted to the Tugby and Keythorpe Neighbourhood Plan as a suitable and sustainable site for residential development. The site was initially submitted to the Neighbourhood Plan Group in June 2019 as site for a low-density scheme of 40 dwellings. 1.3 In March 2020, the Neighbourhood Plan Group provided us with a copy of the draft ‘Sustainable Site Assessment’ (SSA) for the site. We provided a response to the draft SSA and confirmed that the site could come forward for a lower number of dwellings. We note that this has resulted in the 4 site being assessed twice by the SSA published with the current Draft Neighbourhood Plan first as a potential site for 50 dwellings and secondly as a site for 19 dwellings. 1.4 As we will reiterate within these representations, we are concerned that the merits of allocating land for a larger residential development in Tugby have not been fully considered by the currently drafted Neighbourhood Plan. We therefore request that the Neighbourhood Plan Group takes the opportunity to consider again the merits of allocating the land at Wood Lane for residential development. 1.5 It is anticipated that the Tugby and Keythorpe’s Neighbourhood Development Plan Steering Group will prepare and submit a Basic Conditions</p> | <p>Noted.</p> <p>The Neighbourhood Plan allocates sufficient housing to meet, and exceed, the housing requirement set by Harborough District Council. It is not required to allocate more housing and the Qualifying Body has taken the decision that the amount of housing provided through the Neighbourhood Plan addresses the issues appropriately for the Parish.</p> <p>The Basic Conditions Statement will be provided on submission of the Neighbourhood Plan.</p> | None |

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| | | | <p>Statement ahead of submitting the emerging Neighbourhood Development Plan to the Local Planning Authority for the Regulation 16 Consultation and Independent Examination. This response to the current Regulation 14 Consultation comments, where necessary, on whether the Draft Neighbourhood Development Plan in its current form meets the relevant Basic Conditions as set out within the National Planning Practice Guidance. 1.6 These representations follow the order of the policies within the Draft Neighbourhood Plan, where we have not commented, we have no specific comments at this stage. If you have any questions regarding these representations, please contact the author. 5 02 Legislative Context 2.1 Paragraph: 065, Reference ID: 41-065-20140306 of the National Planning Practice Guidance (PPG) sets out the basic conditions that a draft Neighbourhood Plan or Order must meet if it is to proceed to referendum. 2.2 Before a Neighbourhood Development Plan can be put to referendum and be made, each of the basic conditions set out within Paragraph 065 Reference ID 41-065-20140306 must be met. The basic conditions are set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 as applied to Neighbourhood Plans by Section 38A of the Planning and Compulsory Purchase Act 2004. The basic conditions are as follows: • Basic Condition (a) - have regard to national policies and advice contained in guidance issued by the Secretary of State. Note: this means that a Neighbourhood Plan must not constrain the delivery of important national policy objectives which are in the mainly set out within the National Planning Policy Framework (NPPF) (2019). • Basic Condition (b) - have special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses. * • Basic Condition (c) Have special regard to the desirability of preserving or enhancing the character or appearance of any conservation area. * • Basic Condition (d) - the making or the order (or Neighbourhood Plan) must contribute to the achievement of sustainable development. • Basic Condition (e) - the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development</p> | | |
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| | | | | <p>plan for the area of the authority (or any part of that area). 6 • Basic Condition (f) - the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations. • Basic Condition (g) - ensure prescribed conditions are met in relation to the Order (or plan) and that prescribed matters have been complied with in connections with the proposal for the Order (or neighbourhood plan). 2.3 *Note: Conditions (b) and (c) apply only apply to Neighbourhood Development Orders. Therefore, for the purpose of Tugby and Keythorpe’s emerging Neighbourhood Development Plan, only conditions a, and d - g apply.</p> | | |
| 13-14 | Chapter 4 | Housing and the Built Environment, Housing Provision | Fisher German - on behalf of the Trustees of the John Pick Will Trust | <p>This references the Harborough Local Plan 2011- 2031 which classifies Tugby as a ‘Selected Rural Village’. Tugby is therefore identified as a settlement suitable for “rural development on a smaller scale than Rural Centres reflecting their limited services and facilities. Development should be primarily in the form of small-scale infill developments or limited extensions to help address economic, social or community objectives. This could include schemes to enable more social housing, small-scale market housing and development aimed at meeting the needs of local people”. 3.2 Reference is also made by the Neighbourhood Plan to a housing requirement for Tugby of 30 dwellings for the 2011 - 2031 plan period. At the time of the adoption of the District Council’s Local Plan in 2019, the requirement for Tugby was 15 dwellings. However, due to further existing planning consents in the village, a requirement for Tugby, as at March 2020, was confirmed with Harborough District Council as 5 dwellings. 3.3 Page 14 of the Neighbourhood Plan notes that “The Parish Council has agreed that to “future proof” the Neighbourhood Plan a small number of additional units would be supported to address any future increase in housing need”. This has therefore resulted in the Neighbourhood Plan Steering Group identifying a site for 11 dwellings. 3.4 Whilst we do welcome the Parish Council’s intention to “future proof” the Neighbourhood Plan. We are concerned that only identifying land for a further 6 dwellings, which is a very small number compared with the 30 dwellings first identified for the village, will not in reality achieve this aim. 3.5 Firstly, it is</p> | <p>Noted.</p> <p>The additional housing provided for in the Neighbourhood Plan may appear to be ‘a small number’ but is proportionate to a parish the size of Tugby and Keythorpe.</p> <p>If there is a requirement for the parish to deliver more housing in the future, then consideration will be given for a review of the NP, but this will be determined at the time.</p> <p>You may consider the uplift of 6 dwellings to be superseded by a higher requirement, but this is speculation at this time.</p> <p>The NP meets the basic requirements in relation to its housing provision</p> | None |

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| | | | <p>noted that the Harborough District Local Plan makes reference to the fact that Leicester City Council are unable to meet all of their housing needs within the City boundaries. Paragraph 5.1.7 of the Harborough Local Plan states that “A Memorandum of Understanding (MoU) is currently being prepared by the 8 local authorities within the HMA. This document will identify how any unmet housing needs will be accommodated and will be signed by each authority as a binding agreement. Until the MoU is agreed and the scale of any unmet need for Harborough to help to meet is identified, Harborough’s plan requirement is 557 dwellings per annum, or 11,140 dwellings in total over the plan period”. 3.6 At present, a MoU is still to be agreed/prepared by the local authorities in the Housing Market Area (HMA). However, in September 2020, Leicester City Council published its housing land supply and expected unmet needs. Their unmet need amounted to 7,742 dwellings up to the period 2036, although projecting no unmet needs until 2030. Recent revisions to the Standard Methodology for assessing Local Housing Need (December 2020) however have delivered a 35% increase to the 20 biggest cities and towns in England. In terms of Leicester City, against their published supply, this means that their unmet needs will rise to 18,435 dwellings, with unmet needs existing now, and throughout the plan period. 3.7 On this basis, it is considered inevitable that six Leicestershire Authorities (assuming Oadby and Wigston will not be able to assist in meeting unmet needs) will need to increase their housing requirements to deliver this total. This total will be established through cooperative working between the authorities and as such only predictions can be made at this stage. However, on the basis of an equal split, Harborough District will need to increase their overall housing requirement by c. 3,073 dwellings. Whilst the eventual split will likely be more nuanced, it does show the potential for a significant level of increase in the current Local Housing Need for the District. 3.8 Whilst we do acknowledge that the Government’s recent response to the local housing need proposals consultation (April 2021), states that the cities and urban centres will be expected deliver this 35% uplift themselves. We nonetheless</p> | <p>and this is what the Examiner will be looking for.</p> | |
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| | | | | <p>consider this to be wholly unrealistic. Especially, in the case of Leicester, where aside from the recent changes to the standard methodology, they have still historically unable to find land for 7,742 homes. 3.9 Overall, we consider that the likely significant increase in dwellings Harborough District will need to Plan for, will trigger an early review of the District Local Plan. As part of a Local Plan review new housing targets will be set for the settlements in Harborough and it is therefore likely that Tugby will receive a new increased housing requirement. Given the number of homes (30 dwellings) previously initially assigned to Tugby (before consents were granted at a time when there was no five year housing land supply), it is considered that the additional 6 dwellings the Neighbourhood 9 Plan is currently planning for is not proactive and could very easily be superseded by a higher requirement. 3.10 Having a robust housing requirement and a higher number of allocations will assist in ensuring the Neighbourhood Plan Group has the final say on allocations through this Neighbourhood Plan. If sufficient development is not allocated within this Neighbourhood Plan, then Harborough Borough Council may need to impose further allocations as part of a future review of its Local Plan. If there is desire to ensure the community have first choice of sites, then the Neighbourhood Plan must positively identify sufficient land, otherwise risk having sites imposed by the District Council.</p> | | |
| 15-17 | Policy H1 | Limits to development | Fisher German - on behalf of the Trustees of the John Pick Will Trust | <p>Residential site allocation - Land is allocated at Harbrook Farm (11 dwellings) 3.11 It is noted that the Neighbourhood Plan as drafted includes an allocation for 11 dwellings on land at Harbrook Farm (located off Main Street). Whilst we note that the Harbrook Farm site has achieved the best score within the updated Sustainable Site Assessments (SSA) - it is ranked first place, we are concerned that the SSAs have been unduly biased against the merits of allocating larger housing sites in the village, such as the land at Wood Lane, north of the A47. 3.12 In particular, the SSA's first Site Sustainability Criteria (Site Area and Capacity), only allows sites to achieve a 'green' score when they are for 4 dwellings or less. 'Amber' is attributed to sites of 5 to 15 dwellings, and sites over 15 dwellings are scored 'red'. We believe this scoring criteria</p> | <p>Noted. We disagree with this comment.</p> <p>The site assessment process was independently led and the scoring criteria reflects locally important issues. It is for this reason that larger sites which delivered greater levels of housing than was required were marked down.</p> | None |

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| | | | <p>fails to meet Basic Condition (a) - the need to have regard for national planning policy. The NPPF is clear, at paragraph 59, that it is the Government’s objective to significantly boost the supply of homes. To support this, it is important that a sufficient amount and variety of land can come forward and that the needs of groups with specific housing requirements are addressed. 3.13 We are concerned that the SSA is unreasonable as a proposal for 15 or more dwellings is not inherently unsustainable. Indeed, a larger development of more than 15 dwellings could deliver a number of benefits for the village. These include (but are not limited to), new affordable dwellings, the provision of a greater range of dwelling type for the village, developer contributions towards local services (e.g. school places) and increased public open space provision. 10 3.14 In particular, the contents of the Tugby and Keythorpe Housing Needs Report (February 2019) are noted. These emphasise that the 2011 Census found that home ownership levels are high within the Parish (85% compared with the District average of 78%). Moreover, 7% of households live in private rented accommodation (District 11%) and only 5% live in social rented accommodation (again lower than the District average which is 8%). In terms of dwelling type, the 2011 Census showed that the majority of dwellings are detached (66%), which is much higher than the District average (48%). Semi-detached housing accounted for only 20% of the housing stock against 29% for the District. 3.15 The Tugby and Keythorpe Housing Needs Report concludes that: “There is evidence of under occupancy suggesting a need for smaller homes of one to two bedrooms which would be suitable for residents needing to downsize, small families and those entering the housing market. Providing suitable accommodation for elderly residents will enable them to remain in the local community and release under-occupied larger properties onto the market which would be suitable for growing families. There is a predominance of large detached and high value housing. There is an under representation of housing for single people with just 1% of dwellings having one bedroom. Land Registry data indicates there has been some new build housing market activity over recent years, but this has been</p> | <p>The NP does, therefore, boost the supply of homes. It is an inaccurate interpretation of the NPPF to suggest that not allocating the largest site available is necessary.</p> <p>The allocation is considered appropriate given the size of Tugby and the housing requirement set by Harborough District Council.</p> | |
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| | | | | <p>predominantly high value detached housing. Deprivation is not a significant issue in the local area but IMD domain data suggests that some residents may find it difficult to access owner occupation or access the private rental market". 3.16 As the above shows, there is clearly a need for a greater range of dwelling type to come forward in Tugby and therefore, we believe that the SSA's first Site Sustainability Criteria (Site Area and Capacity), should be amended to not unduly mark down sites of more than 15 dwellings in recognition that it is sites with a higher number of dwellings that have the ability to deliver a wider range of market and affordable homes and not just the "high value detached housing", which the village has seen built in recent years. 3.17 Regarding the proposed residential allocation at Harbrook Farm, whilst it is noted that the development is being required to deliver 5 affordable homes and give priority to homes of three bedrooms or fewer. Nevertheless, a site for only 11 dwellings will only make a minimal contribution towards addressing the current imbalance in the range of housing available in the Parish. There is also a significant risk that any potential planning application located on the site may seek to deliver 11 only 10 dwellings. This means it would need to make no provision for affordable housing, and other tariff-style developer contributions, for example including things such as contribution to local schools. Allocation of a larger site would provide more certainty that such vital community contributions would be made. 3.18 We therefore consider that the land at Wood Lane should be allocated within the Plan as it provides an opportunity to deliver a wider range of housing for the village, but still on a relatively modest scale.</p> | | |
| 17-18 | Policy H2 | Limits to Development | Fisher German - on behalf of the Trustees of the John Pick Will Trust | <p>3.19 Figure 3 of the Neighbourhood Plan contains the following proposed Limits to Development for Tugby: 12 3.20 In general, we are supportive of that the Limits to Development have been drawn to include the existing homes to the north of the A47/Uppingham Road. We believe this recognises the status that this part of the village has, as an equal part of the village community, regardless of the A47. 3.21 However, we are concerned that the buildings associated with Tugby Orchards have been excluded. In particular, we note that Café Ventoux</p> | On reflection, we have decided to keep the café outside of the Limits to Development. Further proposed development of this site will be covered by the countryside policy which applies to development proposals | None |

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| | | | | <p>which operates both as a café and as a village shop (which has become more popular and important to the community during the COVID-19 pandemic) has been excluded. We consider that this plus the other businesses at Tugby Orchards, which provide local employment in the village, should be included within the Limits to Development in recognition of the importance they have to the life and vitality of the village. 3.22 In addition to this, we also consider that the Neighbourhood Plan should be amended to include the land to off Wood Lane as a proposed housing allocation site, within the Limits to Development. 3.23 As will be detailed in Section 4 below, the land off Wood Lane is a suitable and appropriate site for residential development</p> | <p>outside of the Limits to Development.</p> <p>Extending the Ltd to include further proposed development is not appropriate without extending the boundary elsewhere and as the NP allocates a site to meet its housing requirement, this is not necessary.</p> | |
| 43-46 | ENV9 | Important Views | Fisher German - on behalf of the Trustees of the John Pick Will Trust | <p>3.24 This policy sets out that the identified views at Table 3 and Figure 13 of the Plan are important to the setting and character of the village. Development proposals should respect and protect them and any development which would have an unacceptable impact on the views will not be supported. 3.25 Viewpoint 3 is taken from Wood Lane as shown by the Plan extract below: 13 3.26 It is noted that the land off Wood Lane is largely obscured from view by the mature trees along the edge of Wood Lane. Although a ‘glimpsed view’ of the existing buildings on the land off Wood Lane is visible to the right-hand side of the photograph above. 3.27 At present, the current buildings on the land at Wood Lane are not considered to provide an attractive gateway to the village. As such, the site’s development for residential use would present an opportunity to enhance the visual appearance of this gateway into Tugby and enhance proposed Viewpoint 3 through the provision of appropriate landscaping as part of a scheme on the site.</p> | <p>Noted. We disagree that development of land off Wood Lane would enhance the view.</p> <p>Rural buildings are part of the countryside and preferable locally to the views of further residential development.</p> | None |
| General comments | Proposed development | Proposed development | Fisher German - on behalf of the Trustees of the John Pick Will Trust | <p>Proposed Development - Land off Wood Lane / land north of the A47 Site and Surrounding Context 4.1 The site is located to the north of Tugby on land that lies to the north-west of Wood Lane, the entire site is approximately two hectares in size. 4.2 Existing dwellings adjoin the south-western boundary of the site and Tugby Orchards Business and Events Centre lies to the south-east of the site. Agricultural land lies beyond the north-eastern and north-western boundaries. 4.3 The site is within walking</p> | <p>Noted.</p> <p>Development of this site is not supported because of the separation of the site from the village and facilities in Tugby by the A47. Proposed road</p> | None |

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| | | | <p>distance of a number of local services and facilities in Tugby which include: • Café Ventoux with Village Shop (opposite the site, approx. 1 minute walk); • Bus Stops on Uppingham Road/A47, served by the regular 747 (Leicester - Uppingham) Bus Service, (approx. 4 minute walk); • G T Doughty Butchers (approx. 6 minute walk); • Tugby C of E Primary School (approx. 6 minute walk); • St Thomas A Becket Church (approx. 6 minute walk); • Fox & Hounds Public House (approx. 8 minute walk); • Village Hall and Recreation Facilities (approx. 12 minute walk). 4.4 The site comprises a range of buildings including agricultural buildings associated with Lane Farm and two existing dwellings. A portion of the site fronting Wood Land is currently a paddock in occasional grazing use. As highlighted previously the existing agricultural buildings on the site are no longer required for the family's farming business. The farm will be worked by contractors who do not need to use the buildings. 4.5 As the buildings are now surplus to requirements, we wish to highlight that the existing farmyard only could come forward for re-development as part of the Neighbourhood Plan. Equally the Landowners are willing to make the entire site available for development too. 15 Proposed Development 4.6 The site can deliver a sensitive, well-designed residential development, providing a logical extension to Tugby. It is proposed that a scheme of 20 dwellings could come forward on the existing farmyard. Or a larger scheme of up to 40 dwellings could come forward on the existing farmyard plus the existing paddock land also. 4.7 Working with the Neighbourhood Plan Group, we are committed to giving detailed consideration to the design and layout of the site and ensuring the building materials ensure the development can assimilate with its surroundings and reflect the character of the existing settlement. 4.8 Any development would incorporate a range of house types, sizes and tenures to ensure the creation of a mixed neighbourhood which would complement and enhance the existing community. Strategic Sustainability Assessment 4.9 As noted above, the SSA published with the current Draft Neighbourhood Plan first as a potential site for 50 dwellings (Site 1) and secondly as a site for 19 dwellings (Site 1a). 4.10 We are</p> | <p>improvements would not overcome these issues.</p> | |
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| | | | | concerned that the scoring attributed to the site within both SSAs is unreasonable and therefore we will outline below why this needs to be amended. The table below relates to the assessment of Site 1a for approximately 19 units and the comments below should be applied to both assessments. | | |
| General comments | Proposed development | Proposed development | Fisher German - on behalf of the Trustees of the John Pick Will Trust | Attached Appendix 1 - RAG rating document submitted on site suitability. | Noted. Opportunities were available to challenge the SSA scores and amendments to the scoring system made where considered appropriate. | None |
| General comments | Proposed development | Proposed development | Fisher German - on behalf of the Trustees of the John Pick Will Trust | In line with our comments above, we believe that the land off Wood Lane should be considered a sustainable and appropriate location for housing development. 4.12 We note that previously, there has been support within the village for the land off Wood Lane to come forward for development, and that this was previously brought to the attention of the Neighbourhood Plan Steering Group by Cllr Gail Squire (Chair of Tugby and Keythorpe Parish Council). 4.13 Minutes of a meeting of the Tugby Neighbourhood Plan Steering Group, held via Zoom on 6th July 2020, state the following: "P16 - There was extensive debate about the preferred site selected by the Housing Group. RP confirmed the amount of time and debate that the group had spent at arriving at the conclusion with the input of Derek from Your Locale and also advised that a different site might have been favoured if it were not for feedback received from HDC effectively ruling out sites to the north of the A47". 4.14 We note that there is mention of 'feedback' from Harborough District Council which rules out sites north of the A47 (i.e. the land off Wood Lane). However, no details of this feedback have been provided online as part of the current consultation (nor has it been provided when we have previously requested it from the Neighbourhood Plan Group). As such, it is considered that we have been unfairly disadvantaged as a result of not being able to view this information and respond to it. In any event the Neighbourhood Plan process enables communities to take the lead in plan making, not the | Noted. This will be considered on review of the NP once the transport issues have been resolved. | None |

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| | | | | <p>Council. Only if there is a specific policy in the Council's Development Plan which states development north of the A47 would be unsuitable, would such an option be unavailable. Simply, because Officers have stated concerns this is not sufficient to prevent such an allocation being advanced. 4.15 Nevertheless, we have recently made our own enquiries with Matthew Bills, Neighbourhood and Green Spaces Officer at Harborough District Council to confirm whether they have made any comments on the land off Wood Lane. From Matthew we understand that the District Council gave initial informal advice to the Neighbourhood Plan Group in April 2020 (without prejudice) based on evidence they were provided with at that time. 4.16 Matthew has provided us with a summary of the comments made. We have listed the comments below alongside our response as a means to address the concerns raised:</p> <ul style="list-style-type: none"> • Concern about location on north side of A47 and relationship to existing village Fisher German Comment: As the Neighbourhood Plan Group are aware, the Limits to Development for Tugby have now been drawn to include existing dwellings to the north of the A47, which are recognised as forming an important part of the village community. As such, the status of the land off Wood Lane, as an edge of village site, has been further reinforced. It is therefore clear that the site does benefit from a strong relationship within the existing village. • Concern about integration of new community with existing village Fisher German Comment: As raised above, the existing homes on the north side of the A47 are already a part of the village community. Moreover, Café Ventoux which also contains a Village Shop and is therefore an important focus for Tugby's community, lies on the opposite side of Wood Lane to the site. Any new residents on the site would be within easy walking distance of this facility and could very easily engage and integrate with members of the existing community. • Concern about difficulty of access to existing facilities across the A47 Fisher German Comment: To our knowledge this concern has not arisen through comments raised by the Highways Authority. As mentioned previously, a Highways Consultant has reviewed the site and has confirmed that in principle, a residential | | |
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| | | | <p>development would be acceptable and that safe vehicular access to and from the site via Wood Lane can be achieved. Regarding the need to cross the A47, the Consultant also confirmed that there could be scope to provide a pedestrian refuge island on the A47 in order to enhance access to the village. Therefore this development would have potential to deliver a crossing which would benefit both the proposed residents and the existing residents who already cross the A47 on foot in order to access both the bus stop to Uppingham on the north side of the A47 and the facility at Café Ventoux/Tugby Orchards. We are disappointed that this comment was not shared with us by the Neighbourhood Plan Group as this would have enabled us to undertake a Highways Report in time for the current consultation. We therefore request that the Neighbourhood Plan Group allow us extra time in order to prepare a report to allay these concerns. We would be grateful if the Neighbourhood Plan Group could confirm if they will allow us this opportunity ASAP. 26 • Recognised that the location would not impact the conservation area and listed buildings but was felt to be outweighed by its relative isolation and A47 barrier Fisher German Comment: We welcome the recognition that this site will not impact the Conservation Area or Listed Buildings. However, as noted above, we do not believe the other concerns raised are insurmountable. • Consideration of the brownfield site was felt to not be sufficient to overcome the above Fisher German Comment: The site comprises a number of large unsightly buildings which are no longer needed for farming operations. In their current state, they offer no benefit to the visual appearance of Tugby, as experienced on the approaches to the village southeastbound on the A47 or southbound on Wood Lane. Their proposed redevelopment for housing provides an opportunity to enhance the visual appearance of the village. Moreover, as outlined above, the issues raised by the Council are not insurmountable. • Noted that the site had not been promoted through the SHLAA Fisher German Comment: In April 2020 there was no active Call for Sites being undertaken by HDC. However, as part of the current Call for Sites (which closes on 4th June 2021), the site off Wood Lane will be promoted. Regardless of this, the site's</p> | | |
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| | | | | <p>submission to the Neighbourhood Plan demonstrates our Client's willingness to make it available for development.</p> <p>27 05 Conclusion 5.1 The land at Wood Lane, Tugby, is a sustainably located residential development site that is capable of delivering a high-quality development of approx. 20 dwellings which will complement the existing village. 5.2 As a site which can accommodate a greater number of dwellings than the current Neighbourhood Plan allocation, it provides an opportunity to deliver a wider range of homes for the village, and plan for a higher quantum of development, which will ultimately enable the Neighbourhood Plan to be 'future proofed'. This is important as it is likely that Harborough District Council will be required to revise their housing requirement in order to address Leicester City's unmet housing need. The Neighbourhood Plan has an opportunity to plan for this now, on a community led level, rather than waiting for a larger housing requirement to be imposed by the District Council at a later date. 5.3 We therefore politely request that the Neighbourhood Plan Steering Group give serious consideration to allocating the land off Wood Lane for residential development within the Neighbourhood Plan.</p> | | |
| General comments | Proposed development | Proposed development | Fisher German - on behalf of the Trustees of the John Pick Will Trust | <p>Hub Transport Planning Ltd has been commissioned by Mrs Maureen Pick to provide transport advice for a proposed residential development of up to 20 dwellings off Wood Lane, Tugby.</p> <p>7.2 Safe and suitable vehicular access can be provided to the proposed development site from Wood Lane via a priority T-junction; pedestrian and cycle access will also be accommodated into the proposed access and site layout design, with a footway provided along the western side of Wood Lane providing a continuous link to the existing footway network alongside the A47.</p> <p>7.3 Junction improvements will be made at the A47/Wood Lane/Main Street junction in the form of an uncontrolled pedestrian crossing with dropped kerbs and tactile paving across the A47 and Wood Lane arms of the junction.</p> <p>7.4 The proposed development will generate approximately one vehicle every six minutes during the AM and PM peak hours; the impact of this traffic on the adjacent highway network will be considered in detail as</p> | <p>The comments from the transport consultant are noted.</p> <p>This does not elevate the site to become the highest scoring site and it does not, therefore, change the allocation in the NP.</p> <p>Rather than provide a partial report from a transport consultant, it would have been helpful to have obtained support from the Highways Authority.</p> | None |

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| | | | <p>part of any future application, however, at this stage it is not expected to have a material impact on the operation of local junctions.</p> <p>7.5 Capacity analysis of the A47/Wood Lane/Main Street crossroad junction suggests that it currently operates well within capacity and is forecast to continue to do so into the future years of both 2026 and 2031 with the additional development traffic on the network.</p> <p>7.6 A review of accident data in the vicinity of the site does not suggest there are any specific highway safety issues that would need to be addressed; however, further consideration of accidents will be examined as part of the Transport Assessment report that will accompany an eventual planning application.</p> <p>7.7 The site benefits from several local facilities within a comfortable walking and/or cycling distance; these include a primary school, café, public house, and local butchers.</p> <p>7.8 Bus stops are located on the A47 within a comfortable walking distance of the site and provide realistic sustainable travel opportunities for potential residents of the site to travel to Leicester for commuting purposes.</p> <p>Conclusions</p> <p>7.9 The National Planning Policy Framework (NPPF) states that opportunities to promote sustainable transport modes should be taken up and that safe and suitable access to the site is achievable for all users. 7.10 The development is located to make use of existing infrastructure and services and is suitable in transport terms. The development will promote the use of sustainable modes of transport and the site provides safe and suitable access for all users.</p> <p>7.11 Bearing the above in mind, the NPPF states that: 'Development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual impact on the road network would be severe.'</p> <p>7.12 The assessment work undertaken and detailed in this report demonstrates that, in NPPF terms, the development will not have a severe impact on the operation of the local highway network or an unacceptable impact on highway safety.</p> | |
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| | | | | Also See Appendix 2 for full data - traffic survey relating to proposed development. | | |
| 13 | 4 | Housing and the built environment |  Tugby Resident 2 | <p>Having recently received The Tugby and Keythorpe Neighbourhood Plan, I strongly object to the identified land site at Harbrook Farm for housing development. 1. This land is in a designated 'Conservation' area and what's the point of having conservation areas if they are to be built on. 2. I feel the road (Main Street) and village infrastructure cannot support the extra road traffic that would be generated by such a development. The land proposed is on a very narrow stretch of Main Street (that is assuming that is where traffic access to the development would be) which has a narrow blind corner which already has caused traffic issues in the past. All the extra cars/vans etc would always have to go through the heart of the village and past the local primary school to reach the A47. 3. The damage caused to local already fragile roads by construction traffic during development could be considerable. 4. The carbon emissions generated by the extra traffic in and out of the village, personal journeys, deliveries, visitors etc will be greatly increased at a time when we are all trying to reduce our carbon footprint. 5. The village has already undergone 2 main housing developments recently. Does it really need such further housing development on this scale being that there are very limited facilities such as local shops, in turn causing greatly increased road traffic throughout the village when home owners journey out for daily supplies, work and leisure. 6. There is a lot of wildlife that would be badly affected by the proposed development. All sorts of wildlife are resident in this area, from insects, pond life, frogs, newts, rabbits, birds, geese to name a few. I have lived in Tugby for the past 17 years and specifically moved here because it is a small village in an open clean environment with daily fresh air. Why destroy this environment with further housing development, generating busier village road congestion and pollution along with the adverse effect to local wildlife. If really required, surely any new housing development would be more appropriately situated nearer to the A47, not bringing the extra road congestion directly into and</p> | <p>Noted thank you.</p> <p>The presence of a Conservation Area does not prohibit development.</p> <p>You may feel that Tugby cannot sustain further development, however this is a requirement from the District Council and NPs cannot promote fewer houses than are required. Any concerns about the location of the development would be identified by the Highways Authority, and development will not be allowed to go ahead without their approval.</p> <p>The extra development helps to sustain the existing facilities.</p> <p>The NP goes to great lengths to protect environmental aspects.</p> | None |

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| | | | | through the village. More than one point of access should also be considered, there is only currently one minor road route to the site at Harbrook farm. There is a good possibility that the extra 5 dwellings required could well be achieved by individual house builds over the future years without the need for a dedicated site. Aside from the above, I live adjacent to this land and from a personal perspective, the current outlook from my property would be badly affected and no doubt the value of my home would be also . I do hope my objections and reasons for concern are taken into consideration before proceeding further with this matter. | | |
| General Comments | General Comments | General Comments |  Tugby Resident 2 | Whilst I think the overall NP for the area is a good idea for the future of the area and residents, I don't see the need for continual housing development to such a scale given the two recent housing projects in Tugby. Keep the village a village. | Noted, thank you. The housing requirement is set by the District Council and allowing for a small number of additional dwellings helps to protect the Parish from future inappropriate development. | None |
| 15-17 | Residential Allocation | Policy H1 | Mr Matthew Bills - Neighbourhood and Green Spaces officer - HDC | POLICY H1: Residential site allocation - Land is allocated at Harbrook Farm for residential development as shown in figure 2 below. Development will be supported subject to the following planning conditions being met: a) The development will provide for up to eleven dwellings; b) A minimum of five of the dwellings will be affordable; Criterion b is probably best to state "minimum of 40%" in case the development comes forward with less than 11 dwellings. f) The design and elevational treatment to the units abutting the village built form will be of a high quality so as not to undermine the setting and be sensitive to the heritage aspects of the site. The whole site is within the Conservation Area (and there is a Listed Building opposite the site frontage on Main Street), so this criterion should be worded to reflect this and not appear to only apply to "The design and elevational treatment to the units abutting the village built form". Current wording seems to suggest that only the proposed elevations facing the current village need to be high quality & sensitive... g) | Agreed. We will change the policy to say 'minimum of 40%' Agreed. | Change to be made as indicated. Change to be made as indicated. |

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| | | | | <p>Priority will be given to dwellings of three bedrooms or fewer; It would be helpful if this was a clearer stipulation, like with some other NDPs, e.g., it was prescriptive in the quantum of 3 or less bedroom dwellings vs 4 or more bedroom dwellings. Such as “A minimum of 75%** of the market dwellings shall be 3 or less bedroom dwellings, or in accordance with the most up to date objectively assessed housing needs of the locality.” **taken from HEDNA Table 55: h) The development will not create an adverse impact on the character of the area, or the amenity of neighbouring dwellings; This should also protect the amenities of proposed future occupiers of the development. j) The whole of the site is to be built as one carefully designed scheme. The residential development will be considered as one project submitted as one planning application and the site cannot be developed through more than one planning application.; and k) The site cannot be subdivided in development or planning terms. • Replace ‘planning conditions’ with ‘criteria’ • Is ‘up to 11 dwellings’ best way of expressing what is expected from the site? Would it not be better to say ‘a minimum of xx dwellings’ or ‘around xx dwellings’ in order to ensure the site delivers the expected number of dwellings. • Criterion e) does not need to be specified/cross-referenced • What does ‘priority will be given to dwellings of 3 bedrooms or fewer mean’? Are you expecting a certain percentage to be 3 or fewer bedrooms? Would be helpful for policy to be more specific. • j) I think this is overly prescriptive. Could say ‘the whole of the site should be planned and developed as a single, comprehensive and well-designed scheme’. Criterion k) would not be needed as it is repetitive.</p> | <p>Agreed. Change to ‘the mix of housing shall be in line with the latest independently assessed housing needs for the area’</p> <p>Agreed. Will add in the amenity of future occupiers.</p> <p>Agreed. Planning criteria will be used rather than planning conditions.</p> <p>Agreed. Will change to ‘around 11 dwellings.’</p> <p>Agreed</p> | <p>Change to be made as indicated.</p> |
| 19 | Windfall Development | POLICY H3 | Mr Matthew Bills - Neighbourhood and Green Spaces officer - HDC | <p>POLICY H3: Windfall Sites - Proposals for infill and redevelopment sites will be supported where: a) The location is within the Limits to Development; b) They meet an identified housing need in the Parish; c) they retain, wherever possible, existing important natural boundaries and features such as gardens, trees, hedges, footpaths and streams; d) there is a safe vehicular and pedestrian access to the site; e) they do not reduce garden space to an extent where there is an adverse impact on the character of the immediate vicinity. f)</p> | <p>Noted. Policy to be changed to say support will be given where:</p> <p>a) they retain, wherever possible, existing important natural boundaries and features such as</p> | <p>Change to be made as indicated.</p> |

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| | | | | <p>proposals provide a mixture of housing types specifically to meet the latest assessment of identified local needs. Applications for small family homes (2 or 3 bedrooms) or homes suitable for older people will be supported. Larger homes (4 or more bedrooms) can feature in the mix of housing but will be expected to provide a minority on any single site.; and g) They do not result in an unacceptable loss of amenity for neighbouring occupiers by reason of loss of privacy, loss of daylight, visual intrusion or noise. The housing mix criterion should be consistent with Policy H1 and more prescriptive, factoring in that windfall sites may tend to be for just one dwelling. The amenity criterion should ensure satisfactory amenities for the proposed dwelling's/s' future occupiers as well. Policy H3: Consider this is an overly prescriptive policy. • There may be opportunities for windfall development to come forward outside LtD which is inline with NPPF/Local Plan policies. • Not sure how some of the criteria would work in practice (e.g. would 4 or more bedroomed homes only be allowed on sites of 3 or more?). • Is it the intention of the policy to restrict development to meeting a proven local need? How will this be assessed in determining planning applications? • Some of it repeats the design policy (or would be more appropriate in the design policy).</p> | <p>gardens, trees, hedges, footpaths and streams; b) there is a safe vehicular and pedestrian access to the site; c) they do not reduce garden space to an extent where there is an adverse impact on the character of the immediate vicinity. d) proposals provide a mixture of housing types specifically to meet the latest assessment of identified local needs. Applications for small family homes (2 or 3 bedrooms) or homes suitable for older people will be supported. Larger homes (4 or more bedrooms) can feature in the mix of housing but will be expected to provide a minority on any single site; and e) They do not result in an unacceptable loss of amenity for neighbouring occupiers or proposed dwellings' future occupiers by reason of loss of privacy, loss of daylight, visual intrusion or noise.</p> | |
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| | | | | | Development of 4+ bedroomed houses will only be acceptable if they are in a minority, so this is clear that it will apply to developments of 3+ dwellings. | |
| 21 | Affordable Housing | POLICY H4 | Mr Matthew Bills - Neighbourhood and Green Spaces officer - HDC | POLICY H4: AFFORDABLE HOUSING - 40% of all new housing development on sites for more than ten dwellings, or on sites of more than 1,000 square metres, This wording needs to be changed to be consistent with HDC LP Policy H2, i.e., "or on sites with a combined gross floorspace of more than 1,000 square metres..." It currently reads like it applies to the total site area, not gross floorspace. | Agreed | Change to be made as indicated. |
| 8 | Consultation Process | | Mr Matthew Bills - Neighbourhood and Green Spaces officer - HDC | Page 8 references ' Starter Homes' b) Starter homes: is as specified in Sections 2 and 3 of the Housing and Planning Act 2016 and any secondary legislation made under these sections. The definition of a starter home should reflect the meaning set out in statute and any such secondary legislation at the time of plan-preparation or decision-making. Where secondary legislation has the effect of limiting a household's eligibility to purchase a starter home to those with a particular maximum level of household income, those restrictions should be used. I would advise that any reference to starter homes be removed as it is not part of the Government agenda for affordable homes in future and would suggest a broader based terminology to cover all bases for example 'or any discounted market scheme that is introduced by Government in future'. | Agreed. The Government has changed its approach to Affordable Housing for sale since the Regulation 14 process commenced. We will change the reference as proposed. | Change to be made as indicated. |
| 14 | Housing Provision | | Mr Matthew Bills - Neighbourhood and Green Spaces officer - HDC | Page 14: • 3rd para - Update to reflect para 5.1.11 of the adopted Local Plan (i.e. 8,792 built or committed through granting of planning permission or through allocation in neighbourhood plans with a further 225 anticipated on windfall sites, resulting in a residual requirement of 3,975 dwellings) • 4th para - for accuracy this should refer to minimum of 15 dwellings for Tugby as set out in Policy H1 of the adopted LP (taking into account completions and commitments at 31/3/2018). Not sure where the 30 target originated from. | Agreed. | Change to be made as indicated. |

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| General Comments | General Comments | | Mr Matthew Bills - Neighbourhood and Green Spaces officer - HDC | <ul style="list-style-type: none"> • Tugby & Keyworth (sic) NP makes reference to a requirement for only a small number of dwellings (2) required during the plan period - if any further 'potential' sites for housing come forward a key matters to be raised in terms of existing housing is the large number of detached 3/4 bedroom houses and the relatively small proportion of one bedroom dwellings and the acknowledgment in the NP of an under occupation of dwellings and a need for smaller sized houses e.g. one & two bedroom dwellings a proportion would need to be affordable houses. • The inclusion of a planning obligations policy would be a recognition new development can bring significant benefits for a local community, for example, new homes and jobs/employment opportunities and assist in securing through a S106 legal agreement for example a proportion of affordable housing on any proposed housing development that come forward and are implemented. S106 planning obligations are used to secure infrastructure or funding from a developer to mitigate the impacts of a new development, towards for example the community facilities, like village hall, allotments, cemeteries contributions where appropriate. • S106 Planning obligations must meet the three legal tests in Regulation 122 of the Community Infrastructure Levy (CIL) Regulations 2010 (as amended) - necessary to make the development acceptable in planning terms; directly related to the development, fair and reasonable related in scale and kind to the development. • The CIL charge regime was introduced by the Planning Act 2008 and it came into force on 6th April 2010. The CIL is a means for local authorities in England and Wales to help deliver infrastructure to support new development in their area. To date, Harborough District Council has not introduced a CIL charge in the District. This however is being kept under review in conjunction with partner authorities across the Leicester and Leicestershire Housing Market Area. • Consideration should be given to a developer contributions policy in the Neighbourhood Plan recognising the priorities e.g.affordable housing and other community facilities/benefits for the local community are consistent | Noted. We will include narrative about the importance of infrastructure and draw some general infrastructure priorities from the NP policy on new community facilities. | Change to be made as indicated. |
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| | | | <p>with the Harborough Local Plan and in particular policy IN1 - infrastructure provision. Page 16: Second paragraph - delete 'revised and updated' as there is no currently LTD.</p> <p>Page 18: First paragraph refers to 'windfall sites will be for no more than 3 new properties on any site....'. As this is in the supporting text only, it is not policy. Potentially overly restrictive anyhow.</p> <p>Page 40: First paragraph (1st sentence) - Reference should be to ENV 5 not ENV 3.</p> <p>Policy ENV 6: Unnecessary to repeat NPPF policy. Consider moving second part of policy to supporting text.</p> <p>Page 42: Figure 12 - Why are some sites amber and some yellow?</p> <p>Policy ENV 8: In relation to 032 and A/B/C, these are also designated as LGS under ENV 1 and therefore potentially there is a conflict in the policies. Suggest they should not be shown as IOS in this plan just LGS as this offers higher degree of protection.</p> <p>Policy CFA2: Criterion a) unnecessary as NP need to read as a whole.</p> <p>Policy TR2: May be advisable not be too specific with regards to requirements in part a) but just say that all new dwellings will be built to ensure that the installation</p> | <p>Agreed, however the NP makes it clear that the LtD were removed in the current Local Plan.</p> <p>Agreed. This figure will be removed.</p> <p>Agreed</p> <p>We believe this reinforces an important aspect of the policy and would prefer to retain it.</p> <p>The amber sites are identified through the NP, as it says in the policy.</p> <p>We will add in to the text that these sites can be removed as IOS sites if the designation as LGS is approved.</p> <p>We prefer to retain it for emphasis.</p> <p>We believe it is important to retain the reference to 7 kW or</p> | <p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>Change to be made as indicated.</p> <p>None</p> <p>None</p> <p>Change to be made as indicated.</p> <p>None</p> <p>None</p> |
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| | | | | <p>of a home electric vehicle charging point can be facilitated.</p> <p>Policy BE2: • Criterion h) is not justified as it could limit new proposals coming forward. Don't see why new businesses need to be well integrated into and complement existing businesses. • Needs 'and' inserting prior to last criterion to make it clear that all criteria in policy apply. Policy BE4: This policy should allow for suitably designed and located new buildings also.</p> | <p>better to maintain minimum requirements.</p> <p>Agreed</p> | <p>Change to be made as indicated.</p> |
| General Comments | General Comments | General Comments | <p>Sarah Bradley Wright Planning Manager - Leicester, Leicestershire & Rutland CCGs</p> | <p>Joanna.clinton@westleicestershireccg.nhs.uk: Draft Neighbourhood Plan, Tugby & Keythorpe We are writing in response to the draft Neighbourhood Plan for Tugby & Keythorpe. The LLR Clinical Commissioning Groups (CCGs) are supportive of the vision set out in your draft plan and would want to work collectively with you to understand in more detail how the local NHS can contribute to its delivery. Many of the themes identified in the plan will impact upon the wider determinants of health and as a result population health outcomes. We would therefore welcome working together to maximise the opportunity for health and wellbeing within the vision outlined in your plan. In particular, we would welcome: . • Actions to support the goal of sustainable development and community identity; maximising opportunities for residents to come together to create community cohesion and support each other, and protection of community facilities • Ensuring continued ease of access to the surrounding countryside and green spaces, and protection of natural habitats, which will improve the physical and mental health of residents • The actions to create and sustain local jobs and opportunities for new ways of working are welcome, as this is a large contributor to people's health and wellbeing. • That future development is designed in such a way to enhance physical and mental health and wellbeing. • Ensure that there are a range of options for travel within the area that enable residents to get to and from work and leisure easily • Designs that support the reduction in carbon emissions, as this has a direct impact on some resident's health As well as the above generic comments it is important to note that any</p> | <p>Noted. The Parish Council will take up this offer as appropriate.</p> | <p>None</p> |

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| | | | | <p>increase in the number of new residents in any area will have a direct impact upon local NHS services whether that is primary, hospital or community care. Local primary care services are already under high demand and therefore any additional demand from housing developments will require developer contribution to mitigate this. Thank you for the opportunity to comment on your vision and I look forward to working together to make the most of the opportunity and mitigate any impacts from increases in population upon local NHS services. Yours sincerely Joanna Clinton Head of Strategy and Planning</p> | | |
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| General Comments | General Comments | General Comments | Sandra Close Planning Adviser - Natural England | <p>The 'Neighbourhood Planning for the Environment' toolkit.: Natural England formed part of a partnership that has produced a planning toolkit aimed at supporting neighbourhood planning groups developing neighbourhood plans which shape development and land use change in their community. The guide includes: opportunities to enhance the environment and how this can be achieved in plan-making; important issues to consider, including legislative requirements; where to find out more; good practice and real life examples and a checklist to use when developing a Neighbourhood Plan.</p> | Noted | None |
| | | |  Tugby Resident 3 | <p>I would like to comment on Section 4 of the neighbourhood plan, specifically the proposed development site of Harbrook Farm.</p> | Thank you for making comment. | None |
| | | | | <p>I do not think that this is a suitable location within the village to support the development of 11 dwellings. The road surrounding the site is already heavily overused and the entrance to the site is on a sharp bend with limited visibility that has a large number of parked cars surrounding it. I feel the additional dwellings will make the road far too busy and the area surrounding the school busy and dangerous for the local children. The route itself is used on a weekly basis by the local school to access the village hall, the additional traffic will make the route more dangerous for the children. The location of the proposed site is also an area of natural beauty within the village which is regularly utilised by the locals throughout the year. The construction vehicles and everything associated with such a development will struggle with access and put too much pressure on an area of the village already struggling with traffic and cause considerable disruption to those living in the neighboring houses.</p> | Noted. No development will take place without the Highways Authority approving access arrangements. | None |
| | | | | <p>I feel that a far more suitable site would be Picks Farm on the opposite side of the A47. This site has a good infrastructure already in place to support a new development with it's own access to the A47, which has much clearer views and access than the current crossroads. It would incorporate that side of the A47 into the village helping to develop the community feel within</p> | Noted. The site was assessed as part of the process undertaken but did not score highly enough to be included as an allocation. | None |

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| | | | <p>the village. It would also support the local businesses on that side of the road again incorporating them more into the village and building a stronger community. There is good access to the site and with the buildings already in place, you are not destroying or changing the local landscape and beauty. In a time where we are trying to help stop environmental damage and support our planet in trying to recover, does it not make sense to develop a site already there rather than destroy natural habitats and put too much pressure on a part of the village that is already overused?</p> <p>Thank you,</p> <p>██████████</p> | | |
| | | <p>██████████ Chairman East Norton Parish Meeting</p> | <p>What an interesting and well prepared document! I enjoyed reading it, especially the historical records.</p> <p>My initial personal comments are as follows.</p> <p>I was not aware of the opening of a new cycle route and, as a cyclist, would welcome further details. Footpaths, Bridleways and Cycleways Tugby & Keythorpe Parish is well served by multiuse bridleways, footpaths and mountain bike routes, however, the only designated road cycle route are sections of the National Cycleway, 64 & 63. These sections, along with many of the surrounding rural roads, are very popular with road cyclists and are well used throughout the year.</p> <p>The opening of café Ventoux coincided with the opening of a new cycle route - a very pretty and popular part of a national cycleway. In general this is a positive thing and their needs must be considered as we plan for the movement of traffic through the Parish.</p> <p>Apart from three short footpath only paths, which link outlying houses to the main village, the main tracks are multipurpose and are used by horse riders, walkers and off road cyclists. These paths link the parish to Hallaton, Goadby, East Norton, Skeffington, Loddington, Noseley</p> | <p>Thank you for commenting.</p> <p>Noted</p> | <p>None</p> <p>None</p> |
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| | | | <p>Just for interest, I once tried to get triangular 'Cyclists Crossing' signs erected on the A47 either side of the cross roads but this was probably in the days of the A47 being a trunk road and was rejected by Highways England. It might be worth the Parish Council trying again now the A47 has been de-trunked. Though whether the County Council has the money for this is another matter.</p> | <p>Noted. There is already a Community Action which covers the issue of signage at that junction.</p> | |
| | | <p>Robbie Clarey Natural England</p> | <p>Tugby & Keythorpe Neighbourhood Plan - Pre-Submission Draft Thank you for your consultation on the above dated 13 September 2021 and received by Natural England 15 September 2021. Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England is a statutory consultee in neighbourhood planning and must be consulted on draft neighbourhood development plans by the Parish/Town Councils or Neighbourhood Forums where they consider our interests would be affected by the proposals made. Natural England has the following comments to make on this version of the neighbourhood plan: Housing Allocations: We note the inclusion of allocations for a further 11 houses above that which is included within the Local Plan. Natural England advise that these allocations do not trigger any impact risk zones. We consider that the allocations included would not cause a significant impact on designated sites. An impact risk zone would only be triggered for Leighfield Forest SSSI where development consisted of 50 or more residential units in the countryside, or 100 units in an urban area. We welcome the strategy to develop the site as one project; would welcome the requirement for SuDS to deal with Surface water from across the site. SuDS can be interlinked with green infrastructure and</p> | <p>Noted</p> | <p>None</p> |
| | | | | <p>Noted</p> | <p>None</p> |
| | | | | <p>Noted</p> | <p>None</p> |

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| | | | <p>many SuDS features can also contribute to Net Gains in biodiversity on-site, as well as providing amenity within the development. Guidance on sustainable drainage systems, including the design criteria, can be found in the CIRIA SuDS Manual (2015) C753.</p> <p>Biodiversity Net Gain</p> <p>Biodiversity net gain is a demonstrable gain in biodiversity assets as a result of a development project that may or may not cause biodiversity loss, but where the final output is an overall net gain. Net gain outcomes can be achieved both on and/or off the development site and should be embedded into the development process at the earliest stages. The government is intending that it will mandate net gains for biodiversity on new developments in England to deliver an overall increase in biodiversity. Natural England therefore suggests that the net gain approach could be made a requirement for this allocation, which could be an exemplar development demonstrating a net gain in biodiversity. - The new and improved Biodiversity Metric 3.0 has recently launched, alongside the Small Sites Metric (Beta Test Version) and the Environmental Benefits from Nature Tool (Beta Test Version). The tools can be accessed here and include user guides and technical supplements. With the launch of the Small Sites Metric, it should now be much more manageable for the net gain approach to be taken for smaller developments. The advantage of using a recognised metric to deliver net gain is that it provides a clear, transparent and evidence-based approach to assessing a project's biodiversity impacts that can assist with "de-risking" a development through the</p> | <p>Noted. We will reference Biodiversity Metric 3.0 in the section.</p> | <p>Change to be made as indicated.</p> |
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| | | | <p>Avison Young - on behalf of National Grid</p> <p>nationalgrid.uk@avisonyoung.com</p> | <p>National Grid is able to provide advice and guidance to the Council concerning their networks and encourages high quality and well-planned development in the vicinity of its assets. Electricity assets Developers of sites crossed or in close proximity to National Grid assets should be aware that it is National Grid policy to retain existing overhead lines in-situ, though it recognises that there may be exceptional circumstances that would justify the request where, for example, the proposal is of regional or national importance. National Grid's 'Guidelines for Development near pylons and high voltage overhead power lines' promote the successful development of sites crossed by existing overhead lines and the creation of well-designed places. The guidelines demonstrate that a creative design approach can minimise the impact of overhead lines whilst promoting a quality environment. The guidelines can be downloaded here: https://www.nationalgridet.com/document/130626/download The statutory safety clearances between overhead lines, the ground, and built structures must not be infringed. Where changes are proposed to ground levels beneath an existing line then it is important that changes in ground levels do not result in safety clearances being infringed. National Grid can, on request, provide to developers detailed line profile drawings that detail the height of conductors, above ordnance datum, at a specific site. National Grid's statutory safety clearances are detailed in their 'Guidelines when working near National Grid Electricity Transmission assets', which can be downloaded here: www.nationalgridet.com/network-</p> | | |
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| | | | <p>██████████ Doughty Business premises owner and parishioner</p> <p>Tugby Resident 5</p> | <p>and-assets/working-near-our-assets Gas assets High-Pressure Gas Pipelines form an essential part of the national gas transmission system and National Grid’s approach is always to seek to leave their existing transmission pipelines in situ. Contact should be made with the Health and Safety Executive (HSE) in respect of sites affected by High-Pressure Gas Pipelines. National Grid have land rights for each asset which prevents the erection of permanent/ temporary buildings, or structures, changes to existing ground levels, storage of materials etc. Additionally, written permission will be required before any works commence within the National Grid’s 12.2m building proximity distance, and a deed of consent is required for any crossing of the easement. National Grid’s ‘Guidelines when working near National Grid Gas assets’ can be downloaded here: www.nationalgridgas.com/land-and-assets/working-near-our-assets</p> <p>My comments are on Policy BE1 on Page 62 of the draft plan.</p> <p>The Butchers shop does not at present provide employment for local residents.</p> <p>Tugby House and the butchers shop are on the same site which is owned by me.</p> <p>There isn't a separate vehicular access to the butchers shop and it is not possible to provide one. Parking at the shop works by goodwill between my tenant and myself.</p> <p>My tenant has indicated that he intends to retire in 4/5 years time and then I will be looking to sell</p> | <p>Thank you for this comment.</p> <p>Noted. We will remove the references to the Butcher’s.</p> | <p>None</p> |
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| | | | <p>the whole site either as commercial/ residential or residential with possible development.</p> <p>Generally I think that the plan has great merit and I would like to congratulate all the people that have worked so hard to produce it.</p> <p>Leicestershire County Council is supportive of the Neighbourhood plan process and welcome being included in this consultation. Highways Specific Comments It is unclear which footpath is being referred to in regard to the land being allocated at Harbrook Farm, but it is assumed a vehicular access with an adjacent footway leading into the development. Nevertheless, the LHA would assess the site on its own merits, should a proposal be submitted for pre application advice or formally. The site access will need to be designed in accordance with the Leicestershire Highway Design Guide (LHDG) to ensure a safe and suitable access can be delivered in accordance with the National Planning Policy Framework (NPPF). It should be noted that a new development should only mitigate its own residual impact; it cannot be expected for developers to mitigate existing concerns. The LHA would normally expect development proposals to comply with prevailing relevant national and local polices and guidance, both in terms of justification and of design. The request for any improvements to the crossroads junction would also need to meet all the tests as set out in regulation 122(2) of the Community Infrastructure Levy Regulations. General Comments The County Council recognises that residents may have concerns about traffic conditions in their local</p> | <p>Noted. We will change the reference to the LHDG for clarity</p> <p>The remaining general comments are noted.</p> | <p>Change to be made as indicated.</p> <p>None</p> |
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| | | | | <p>area, which they feel may be exacerbated by increased traffic due to population, economic and development growth. Like very many local authorities, the County Council's budgets are under severe pressure. It must therefore prioritise where it focuses its reducing resources and increasingly limited funds. In practice, this means that the County Highway Authority (CHA), in general, prioritises its resources on measures that deliver the greatest benefit to Leicestershire's residents, businesses and road users in terms of road safety, network management and maintenance. Given this, it is likely that highway measures associated with any new development would need to be fully funded from third party funding, such as via Section 278 or 106 (S106) developer contributions. I should emphasise that the CHA is generally no longer in a position to accept any financial risk relating to/make good any possible shortfall in developer funding. To be eligible for S106 contributions proposals must fulfil various legal criteria. Measures must also directly mitigate the impact of the development e.g. they should ensure that the development does not make the existing highway conditions any worse if considered to have a severe residual impact. They cannot unfortunately be sought to address existing problems. Where potential S106 measures would require future maintenance, which would be paid for from the County Council's funds, the measures would also need to be assessed against the County Council's other priorities and as such may not be maintained by the County Council or will require maintenance funding to be provided as a commuted sum. In regard to public transport,</p> | | |
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| | | | | <p>securing S106 developer contributions for public transport services will normally focus on larger developments, where there is a more realistic prospect of services being commercially viable once the contributions have stopped ie they would be able to operate without being supported from public funding. The current financial climate means that the CHA has extremely limited funding available to undertake minor highway improvements. Where there may be the prospect of third-party funding to deliver a scheme, the County Council will still normally expect the scheme to comply with prevailing relevant national and local policies and guidance, both in terms of its justification and its design; the Council will also expect future maintenance costs to be covered by the third-party funding. Where any measures are proposed that would affect speed limits, on-street parking restrictions or other Traffic Regulation Orders (be that to address existing problems or in connection with a development proposal), their implementation would be subject to available resources, the availability of full funding and the satisfactory completion of all necessary Statutory Procedures.</p> <p>Flood Risk Management The County Council are fully aware of flooding that has occurred within Leicestershire and its impact on residential properties resulting in concerns relating to new developments. LCC in our role as the Lead Local Flood Authority (LLFA) undertake investigations into flooding, review consent applications to undertake works on ordinary watercourses and carry out enforcement where lack of maintenance or unconsented works has resulted in a flood risk. In April 2015 the LLFA also became a</p> | | |
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| | | | <p>statutory consultee on major planning applications in relation to surface water drainage and have a duty to review planning applications to ensure that the onsite drainage systems are designed in accordance with current legislation and guidance. The LLFA also ensures that flood risk to the site is accounted for when designing a drainage solution. The LLFA is not able to:</p> <ul style="list-style-type: none">• Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation.• Use existing flood risk to adjacent land to prevent development.• Require development to resolve existing flood risk. <p>When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points:</p> <ul style="list-style-type: none">• Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)).• Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map).• Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding.• How potential SuDS features may be incorporated into the development to enhance the local amenity, water quality and biodiversity of the site as well as manage surface water runoff.• Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk. All development will be required to restrict the discharge and retain surface water on site in line with current government policies. This should be undertaken through the use of Sustainable Drainage Systems (SuDS). Appropriate space allocation for SuDS features should be included | | |
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| | | | | <p>within development sites when considering the housing density to ensure that the potential site will not limit the ability for good SuDS design to be carried out. Consideration should also be given to blue green corridors and how they could be used to improve the bio-diversity and amenity of new developments, including benefits to surrounding areas. Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing watercourses and land drainage (including watercourses that form the site boundary) are retained as open features along their original flow path and are retained in public open space to ensure that access for maintenance can be achieved. This should also be considered when looking at housing densities within the plan to ensure that these features can be retained. LCC, in its role as LLFA will not support proposals contrary to LCC policies. For further information it is suggested reference is made to the National Planning Policy Framework (March 2012), Sustainable drainage systems: Written statement - HCWS161 (December 2014) and the Planning Practice Guidance webpage. Flood risk mapping is readily available for public use at the links below. The LLFA also holds information relating to historic flooding within Leicestershire that can be used to inform development proposals. Risk of flooding from surface water map: https://flood-warning-information.service.gov.uk/long-term-flood-risk Flood map for planning (rivers and sea): https://flood-map-for-planning.service.gov.uk/ Planning Minerals & Waste Planning The County Council is the Minerals</p> | | |
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| | | | <p>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. Property Education</p> <p>Whereby housing allocations or preferred housing developments form part of a Neighbourhood Plan the Local Authority will look to the availability of school places within a two-mile (primary) and three-mile (secondary) distance from the development. If there are not sufficient places then a claim for Section 106 funding will be requested to provide those places. It is recognised that it may not always be possible or appropriate to extend a local school to meet the needs of a development, or the size of a development would yield a new school. However, in the changing educational landscape, the Council retains a statutory</p> | | |
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| | | | | <p>duty to ensure that sufficient places are available in good schools within its area, for every child of school age whose parents wish them to have one. Strategic Property Services No comment at this time.</p> | | |
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