

Scraptoft Neighbourhood Plan

Summary of representations submitted by Harborough District Council to the independent examiner pursuant to Regulation 17 of Part 5 of The Neighbourhood Planning (General) Regulations 2012

Name	Full Representation
<p>Anglian Water (Stewart Patience)</p>	<p>Thank you for the opportunity to comment on the Scraptoft Neighbourhood Plan (Examination Version).</p> <p>It would appear that the area covered by this Neighbourhood Plan is located outside of our area of responsibility. Therefore we have no comments relating to the content of the Neighbourhood Plan.</p>
<p>Aylestone St James RFC (Richard Hickson)</p>	<p>I would like to say that there is no provision for sport and leisure, very little for planned or no-planned play or for young people. As a director of the largest sports provider in the Parish, Aylestone St James RFC I think the Parish needs to address this. As Stoneygate rugby club has now closed with the loss of an eleven acre sports ground within the parish, we are now inundated by requests from local sports and other organisations for use of our facilities. We feel we have a social duty with respect to these groups and have signed a community use agreement, which the parish seems to have ignored.</p>
<p>Davidsons Developments Ltd (David Bainbridge, Bidwells)</p>	<p>MAIN RESPONSE ONLY, APPENDIX DOCUMENTS TO BE SENT SEPARATELY</p> <p>I write on behalf of Bidwells' client Davidsons Development Ltd (DDL) in response to the submitted Scraptoft Neighbourhood Plan 2011-2028.</p> <p>In preparing this response, Bidwells on behalf of DDL are mindful of recent court judgements related to Neighbourhood Planning. These, have confirmed that the Neighbourhood Plan is tested against the current adopted Local Plan, rather than emerging documents. Notwithstanding these judgements, DDL would like to place on record that they are concerned the Scraptoft Neighbourhood Plan is being progressed on the basis of a Core Strategy and 'out of date' housing requirements. This situation is far from desirable, particularly given the chronic national shortage of housing.</p>

The Scraftoft Neighbourhood Development Plan has been produced by the 'Scraftoft Neighbourhood Plan Steering Group' and submitted by Scraftoft Parish Council (the Qualifying Body). The plans and policies apply to the Scraftoft Neighbourhood Plan area as designated on the 29th October 2012.

This letter, together with the following documents, forms the representations of Davidsons Developments Ltd for the consideration of the Examiner.

1. Pre-Submission Response to Scraftoft Neighbourhood Plan submitted by Bidwells on behalf of DDL under letter dated 2 March 2015.
2. Pre-Submission Consultation Representation Form submitted by Bidwells on behalf of DDL dated 2 March 2015.
3. Site Location Plan, drawing reference: GL0366 04, prepared by Golby+Luck.
4. Landscape Note, reference: GL0366, prepared by Golby+Luck.
5. Landscape Analysis, drawing reference: GL0366 02, prepared by Golby+Luck.
6. Harborough District Council Strategic Housing Land Availability Assessment Update (SHLAA) 2015 Economic Land Availability Assessment 2015 Site Suggestion Form submitted by Bidwells on behalf of DDL.
7. 14/00669/OUT Report to 1 July 2014 Planning Committee.

DDL remain committed to their offer of meeting with Scraftoft Parish Council. They wish to reaffirm their view that positively prepared Neighbourhood Plans offer a significant opportunity for communities to be engaged within the planning system. DDL are disappointed that, due to the timeframe between the pre-submission consultation and the submission of the plan, they have been unable to engage with the Parish Council. DDL observe that many of the comments made to the previous stage of consultation have not been properly taken into account. The comments, made to the pre-submission document, were provided in good faith to help ensure that the Neighbourhood Plan not only meets the *basic conditions* but also offers a robust framework to guide development decisions over the proposed plan period of 2011-2028. DDL maintain that emotive terms such as "*fair share of growth*" in respect of housing are not objective, do not provide clear instruction to the decision maker and emphasise the 'anti-development' stance that is embedded within the Scraftoft Neighbourhood Plan.

Furthermore, at the time of preparing the pre-submission response DDL were unable to comment on the Site Selection Framework or the analysis of housing need as both were unavailable. As part of the Submission Consultation, these documents and other relevant aspects of the evidence base have been reviewed.

It is recognised Neighbourhood Plans are not subject to tests of soundness applied to Local Plans. Rather, the Neighbourhood Plan will be assessed against the *Basic Conditions* as set out within section 8(2) of the Town and Country Planning Act 1990 (as amended). However, having reviewed the submitted documentation and the supporting evidence, DDL do not believe that the submitted Neighbourhood Plan meets the *Basic Conditions* in respect of being in *general conformity* with National policies and advice 8((2)a)), contributing to sustainable development 8((2)d), being in general conformity with the strategic policies contained within the development plan 8((2)e)), Compatibility with European Directives 8((2)f)) or meeting the prescribed conditions 8((2)g)).

Compatibility with European Directives and the Prescribed Conditions:

DDL are concerned that the Neighbourhood Plan, as submitted, has not fully complied with condition 8((2)f) and 8((2)g).

These conditions require that "*the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations*" and "*prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan)*".

The Basic Conditions Statement, which accompanies the Submission Neighbourhood Plan, sets out how the Qualifying Body believe they have met these (and the other) basic conditions. The Neighbourhood Planning Regulations² set out at 15(1) ii that:

"where it has been determined under regulation 9(1)...that the plan proposal is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment) a statement of reasons for the determination."

The Basic Conditions Statement, Paragraphs 24 and 25, state no significant environmental effects are likely as a result of the Neighbourhood Plan. However, the screening report, which should set out these reasons clearly, has not been made available on either the Harborough District Council website, or that of Scraftoft Parish Council. We would highlight that the publication of this report is also a key component of the overall SA/SEA process.

Housing and Housing Supply:

DDL are concerned by the strong 'anti-development' stance taken during the preparation of the Scraftoft Neighbourhood Plan. Having reviewed the evidence provided on the Scraftoft Parish Council website, DDL observe the minutes of the July 2014 project group meeting record that there should be "*no further development in Scraftoft*".

It is, therefore suggested that a presumption of no further development in Scraftoft has informed and shaped the plan, through evidence gathering, site selection and the final allocations.

It is noted that the final preferred options were not agreed until December 2014, where it was recorded that the submission of an application on Land East of Beeby Road "*makes the production and acceptance of the Neighbourhood Plan more urgent*" inferring that the purpose of the plan is resist development. This approach to delivering housing within the Neighbourhood Plan is considered to be in direct conflict with the thrust of National Planning Policy which seeks to '*boost significantly*' the supply of housing.

The presumption that there should be no further development appears to be predicated on the basis that the 880 homes allocated to the Leicester Principal Urban Area (PUA) within the adopted Core Strategy have been met, and in doing so Scraftoft has "*accommodated more than its fair share of growth*" (a statement made within the Neighbourhood Plan at paragraph 30).

The adopted Core Strategy Policy CS16 makes is clear that the 880 homes are a *minimum*. Policy CS 16 sets out a number of conditions for additional development but ensures that provided development proposals do not undermine the regeneration objectives of Leicester City and is of a scale that safeguards the identity of the community, there would be no reason why a higher level of housing should not be accommodated over and above the 880 homes. Having reviewed the policies for the distribution of the homes within the Leicester PUA, there is no disaggregation between the settlements (e.g. Scraftoft, Thurnby or Bushby) and therefore no basis that any additional growth should be directed to Thurnby and Bushby

The figures at paragraph 27 are somewhat misleading. They set out total delivery within the PUA, rather than the Designated Neighbourhood Area (the only area to which the plan can relate). It is noted that only 320 homes of the *total* 880 have been delivered, with permission in place for a further 694 (some of which are in Thurnby or Bushby). It is therefore incorrect to state that minimum development needs *have been met* (paragraph 30 of the Scraftoft Neighbourhood Plan).

Basic condition e seeks to test conformity with the adopted Development Plan. DDL wish to highlight that the 880 homes is predicated on the basis of the distribution and housing requirements contained within the revoked East Midlands Regional Plan. More recent evidence, such as that set out within the Strategic Housing Market Assessment (SHMA), prepared by GL Hearn, highlights that the overall figures for Harborough District should be increased from 350 dwellings per annum to approximately 445; these figures are those used by Harborough in assessing their 5-year land supply assessment.

Notwithstanding the likelihood of a higher housing requirement, the approach of the plan is directly at odds with the NPPF's instruction at paragraph 184 that "*Neighbourhood Plans should not promote less development than set out in the Local Plan or undermine its strategic policies*" (*our emphasis*. through imposing a moratorium on development within Scraftoft until such a time as the Local Plan is reviewed. **The plan therefore fails to meet basic conditions 8((2)a) and 8((2)e).**

To ensure that the plan meets the basic conditions, the following amendments are suggested:

Paragraph 27: delete "*this means that the Core Strategy's minimum housing requirements for the area have been met*" and replace with "*this means that the over the plan period it is likely the minimum housing requirements of the adopted Core Strategy will be met. The delivery of housing will need to be monitored and, should this fall below the required level, additional sites will need to be released*". This will ensure that the plan is flexible and capable of being updated. This approach is considered to be in conformity with the NPPF (footnote 11) and assist in ensuring that there is a consistent supply of sites within the PUA.

Paragraph 30: This paragraph should be deleted. It is not factually correct to state that there is no evidence to suggest that a higher level of housing development should take place in Scraftoft relative to Thurnby and Bushby. The evidence, including the adopted policy, makes no distinction between the settlements in terms of the overall housing figures. The statement that "86% of local households" refers to those that responded to the consultations, not the overall village population; this is misleading. For example, the Statement of Consultation highlights that the March 2014 event was attended by just 52 individuals and the questionnaire was returned by only 45 households. This is not 86% of the residents of the village and does not accurately reflect the demographics of the settlement.

Policy S1: It is requested that the following changes are made to the policy to ensure consistency with national and currently adopted local policy.

"The minimum housing provision for ~~Scraftoft~~ the Leicester Principal Urban Area, as defined within the Harborough Core Strategy, for the period 2006-2028 has been ~~met~~ identified. The delivery of sites with planning permission will be kept under review. Should sites not come forward as anticipated, additional sites including reserve sites, will be released to ensure a consistent supply of land to meet housing needs.

Permission for housing development within, or well related to, the Scraftoft Limits to Development, as defined on the Policies Map, will be

granted if the development:

i) is in keeping with the scale, form and character of its surroundings;

ii) does not significantly adversely affect the amenities of residents in the area, including daylight/sunlight, privacy, air quality, noise and light pollution; and

iii) has safe and suitable access to the site for all people"

Housing Reserve Site and Protecting the Countryside between Settlements:

The principle of reserve sites is welcomed. It is agreed that it is important for Neighbourhood Plans to ensure that future development needs are considered carefully and that they remain effective. However, DDL object to the premature 'discounting' of the site based on its location within the Area of Separation and maintain that, based on the evidence used to support the Neighbourhood Planning process that this site could form a reasonable 'reserve' site. For the avoidance of doubt, DDL do not object to the principle of the Neighbourhood Plan identifying a relevant area of separation and a Green Wedge.

DDL welcome the general approach to site selection undertaken by the Parish Council and believe that the methodology seeks to balance planning considerations against the wishes of the community. Whilst it would be helpful to have had a map of the sites included within the Framework to assist understanding and cross referencing between the various supporting materials, this is not considered essential. However, whilst generally supportive, there are a number of concerns in respect of how the assessment has been carried out and conclusions reached.

The methodology appears to have precluded the identification of a series of smaller sites that could contribute to meeting the flexibility required for delivering new homes and supporting infrastructure, rather than a larger single site. It is believed that the search for a single site relates to the presumption that all needs have been met and there is no requirement for further development in the Neighbourhood Area. DDL specifically note that there is no reference made to the size of the sites or the overall quantum of housing required to form part of a 'reserve'.

The technical assessment, which is aligned and consistent with Harborough District's own sustainability objectives, identifies that Land off Station Lane is most favourable. The site is considered to score positively on a range of sustainability criteria. However, land off Station Lane is 'discounted' due to its location within the Area of Separation.

The site selection places significant weight on the Green Wedge and the Area of Separation. These areas were first designated in 1987 and have not been reviewed through the Local Plan process. DDL note that, based on community consultation, Land off Station Lane (site 1) scores 4th with 21 respondents of the 118 believing that this was 'best'; the Consultation Event in March identified the same site as the 3rd preference.

We note that a number of the sites preferred by local residents are located within areas covered by these designations. It is contended that it would be reasonable to assert that, whilst the principle of these designations is supported, a review informed by local residents and up-to-date landscape information should be undertaken.

As such, the application of the Green Wedge and the AOS, has led to the identification of a site that is 'less' sustainable than other

reasonable alternatives.

As such, the plan fails to meet basic condition 8((2)d).

Policy S2 indicates that the site will only be released if the Pulford Drive application is not developed. DDL therefore believe that there is a case to ensure that a range of smaller sites are also identified to help meet any shortfall that could arise due to a lack of delivery from other consents. It is proposed that additional sites are identified, including Land off Station Lane.

More recent evidence and analysis, produced since the dismissed appeals, sets out the relevant context and how the site can be delivered without compromising the wider views to the agricultural landscape and setting of Scraftoft.

It is considered that providing a range of sites, in locations accessible to the village would help ensure that the plan can deliver sustainable development. The following criterion for a reserve site at Land off Station Lane, to be allocated under an additional policy, is suggested:

Land off Station Lane (Site 1) is identified as an additional reserve site, as shown on the policies map. The site will be released for development if:

- i) it is required to meet the wider housing needs of the Leicester Principal Urban Area in the event that there is a shortfall in the supply of housing land due to the failure of existing sites to deliver the anticipated levels of planned development;
- ii) it becomes necessary to provide for additional homes in Scraftoft in accordance with a new Local Plan for Harborough District

In the above circumstances, development will be permitted as follows:

a) The development shall provide for up to 50 dwellings, of which 40% will be affordable homes unless it can be demonstrated that this would be unviable. The type and tenure of such homes shall be based upon the most recent evidence produced by Harborough District Council to ensure that they meet the identified needs of the community;

b) The development shall contribute towards identified infrastructure, including a new Community Hall, as identified within Policy S12.

c) The development will make provision for structured Open Space

d) The development will provide safe access, including the provision of new footpaths to connect to the existing built up area

e) The development will provide appropriate landscaping and design measures to maintain views and vistas of the wider agricultural setting of Scraftoft.

The approach, as set out above, will require an amendment to the Policies Map to ensure that Policy S7 remains consistent.

Due to the matters raised within our representations in respect of the underlying presumption against development that has influenced the plan, resulting in a conflict with adopted housing policy for the Leicester PUA and National Policy, it is requested that the Examiner holds a hearing session in which these issues, together with matters relating to the Area of Separation, can be properly interrogated and understood by all parties.

On behalf of DDL, I would like to emphasise our disappointed that Neighbourhood Planning is being used to block further development

	<p>within the parish and district at a time when within the district there is an acknowledged shortfall of housing, as recognised within the report to the 1 July 2014 Planning Committee in respect of outline planning application reference: 14/00669/OUT, at Land off Pulford Drive, Scraftoft.</p> <p>I look forward to receiving confirmation of receipt of this submission and to be notified of all stages of the plan progress.</p>
<p>English Heritage (Ann Plackett)</p>	<p>We would agree with you that if any allocations were previously assessed as part of the Core Strategy process, it is not necessary to undertake an SEA of the Neighbourhood Plan. However, we advise that if the plan identifies new allocations, it should be subject to SEA. We understand that a 'reserve site' has been identified which has been the subject of a recent planning application. In this case, we consider that you should seek further advice to determine whether an SEA is required.</p> <p>Our current guidance on SEA, which includes reference to Neighbourhood Plans, can be found at: http://historicengland.org.uk/images-books/publications/strategic-environ-assessment-sustainability-appraisal-historic-environment/</p>
<p>Environment Agency (Geoff Platts)</p>	<p>Having read the Scraftoft Neighbourhood Plan Consultation Statement, the Basic Conditions Statement and the Submission Scraftoft Neighbourhood Plan and considered it within the remit of my organisation together with the six bullet points detailed in your consultation e-mail dated 23rd March 2015 I consider it to be acceptable.</p>
<p>Gladman Developments Ltd (John Fleming)</p>	<p>EXEC SUMMARY ONLY, FULL REPRESENTATION TO BE SENT SEPARATELY</p> <p>1.1 Context</p> <p>1.1.1 Gladman Developments Ltd (Gladman) specialise in the promotion of strategic land for residential development and associated community infrastructure. From this experience, we understand the need for the planning system to deliver the homes, jobs and thriving local places that the country needs. Every effort should be made in meeting the housing and economic needs of an area, whilst responding positively to the wider opportunities for growth.</p> <p>1.1.2 This submission provides Gladman's representations to the Submission version of the Scraftoft Neighbourhood Plan (SNP), to which Harborough District Council (HDC) is currently seeking comments.</p>

1.1.3 Gladman submitted detailed representations to the pre-submission consultation in March 2015. In principle Gladman support many of the policies contained in the SNP, specifically the allocation of land east of Beeby Road as a housing reserve site. Whilst we recognise the work undertaken by the Parish Council in the production of the SNP we feel that it is more appropriate if land east of Beeby Road is allocated as a full housing allocation to accord with the requirements of national planning policy and guidance. Gladman consider that land east of Beeby Road can be developed to deliver a higher number of dwellings than currently proposed in the submission version of the plan this is demonstrated through Gladman's existing planning application (ref: 14/01637/OUT) for 178 dwellings with associated community infrastructure. The evidence submitted as part of our application to HDC and our previous representations to the pre-submission version of the Neighbourhood Plan demonstrates that to secure the future sustainability of the village a higher housing requirement in this location is necessary.

1.1.4 With small amendments, Gladman believe that the proposals put forward by the submission version of the Plan are sound and deliverable. To ensure that the full potential of the SNP's policies and objectives can be met in full, Gladman consider that the Parish Council should seek to increase the plan requirement.

1.2 National Planning Policy Framework and Planning Practice Guidance

1.2.1 Before a Neighbourhood Plan can proceed to referendum it must be tested through Independent Examination against the statutory Basic Conditions, set out in paragraph 8 (2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended).

1.2.2 To confirm that the SNP can progress to referendum, the Examiner must conclude that the SNP is able to demonstrate its ability to:

(a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.

(b) Having regard to the desirability of preserve any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order.

(c) Having special regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order.

(d) The making of the order contributes to the achievement of sustainable development.

(e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).

(f)The making of the order does not breach, and is otherwise compatible with, EU obligations

(g) prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order.

1.2.3 It clear from the above requirements set out by both the Framework and PPG that Neighbourhood Plans must conform with national planning policy and the up-to-date strategic policy requirements set out in the relevant authorities up-to-date and adopted Local Plans.

1.2.4 Neighbourhood Plans must take a positive approach to facilitate new development and should not be used as a mechanism to restrict the ability of future growth going forward.

1.3 Emerging Harborough Local Plan

1.3.1 The strategic policies covering the Harborough District were adopted in November 2011. The Harborough Core Strategy is based on a pre-Framework Development Plan, its housing requirement having been identified by the now revoked Regional Spatial Strategy (RSS).

1.3.2 The Core Strategy requires 7,000 units to be delivered over the plan period 2006 – 2026, of which Scraftoft along with Thurnby and Bushby are identified as the Principle Urban Area (PUA) and are required to provide at least 880 dwellings over the plan period.

1.3.3 The adopted Core Strategy was never based on an objective assessment of housing need. To conform with the requirements of the Framework and PPG, HDC are progressing with its emerging Local Plan.

1.4 Scraftoft Neighbourhood Plan

1.4.1 This section of the representations provides specific comments on the policies and objectives contained in the SNP. These submissions are provided in consideration of our knowledge and experience of the planning system, national policy and guidance requirements and neighbourhood planning. All our interests are best served in securing a sound and deliverable plan for Scraftoft.

1.4.2 In principle Gladman are generally supportive of the approach taken by the Parish Council however we feel that the SNP requires some minor alternations so it is able to demonstrate its ability to meet the neighbourhood plan basic conditions.

1.5 Sustainability Appraisal

1.5.1 Whilst there is no legal requirement for a Neighbourhood Plan to have a supporting Sustainability Appraisal (SA), PPG suggests that it may provide a useful approach to assess whether a neighbourhood plan will meet all basic conditions required section 38 of the Planning and Compulsory Purchase Act 2004.

1.5.2 The adequacy of the SA/SEA goes to the core compliance of basic condition (f) which requires strict adherence to the requirements of the Strategic Environmental Assessment Directive and the implementing UK regulations.

1.6 Site Submission

1.6.1 As the Parish Council will be aware Gladman has land interests in Scraftoft at land east of Beeby Road which has been identified by Policy S2 as a housing reserve site. Gladman welcome the Parish Council's decision to identify this land for future housing development and the ability for future sustainable development to be delivered in this location to meet local and the wider areas housing needs.

1.6.2 Gladman has submitted an outline planning application (reference: 14/01637/OUT) for 178 dwellings with associated community infrastructure. The Council will determine the application in June 2015.

1.6.3 Gladman are still of the belief that it would be more appropriate if the Parish Council allocates this land as a full allocation for housing and would support the national growth agenda to boost significantly the supply of housing as set out in the Framework.

	<p>1.7 Conclusion</p> <p>1.7.1 It is clear from the requirements of national policy and guidance that Neighbourhood Plan's must be consistent with both national policy and the up-to-date strategic requirements for the wider local authority area. For the Neighbourhood Plan to be 'made' an independent examiner will have to examine the SNP against the neighbourhood plan basic conditions.</p> <p>1.7.2 Gladman believe that with minor modifications the Plan can be found able to meet the basic conditions as required by national planning policy.</p>		
<p>Harborough District Council (Chris Brown)</p>	<p>Across the document</p> <p>Policy S2 – A</p> <p>Policy S1 and S2</p> <p>Policy S1</p> <p>Policy S7 and Policies Map</p>	<p>The Scraftoft Neighbourhood Plan Pre-Submission document is well written, clear, concise, well presented and shows the amount of work that has gone into the Plan</p> <p>Policy S2 – A, 'around 130 dwellings' requires further clarification. A 'minimum of' figure would be considered in compliance with the Core Strategy.</p> <p>The Council supports the approach taken in Policies S1 and S2, with the provision of a housing reserve site. This sets out the preferred location for further development within the Parish should one of three criteria be met.</p> <p>Additional statement required outlining the need to review the Plan when the Core Strategy is superseded by the Local Plan, and with it the need to potentially update the period of the plan, the target housing requirement, and policy with regards to housing within limits to development where considered necessary.</p> <p>The area of separation needs to be adjusted to exclude the red line boundary of permission reference 14/00669/OUT – Land off Pulford Drive, Scraftoft.</p>	

<p>Highways England (Samantha Pinnock)</p>	<p>Highways England welcomes the opportunity to comment on the Neighbourhood Plan for the Scraptoft Parish Council area. Highways England notes that the Plan has been prepared by Scraptoft Parish Council in order to ensure that the local population have a stronger influence over the way change and development takes place over the coming years. It puts forward a vision and identifies a number of key issues across the Neighbourhood Plan area, alongside local planning policies.</p> <p>It is the role of Highways England to maintain the safe and efficient use of the strategic road network whilst acting as a delivery partner to national economic growth. It is noted that the Neighbourhood Plan covers a small area and that there is no strategic road network routing through the area, or indeed in its vicinity. With this said, Highways England does not consider that the strategic road network will be impacted by any of the local planning policies for growth, as set out in the Plan.</p> <p>Highways England therefore has no comments on the plan.</p>
<p>Leicestershire County Council (Nik Green)</p>	<p><u>General</u> Policy s2, p. 8 Criteria A – I, Subject to the viability of the site, requirements cannot be put on the developer of the site unless they are justified as being needed as a direct result of this development. HDC should be able to advise on this. To some extent this is picked up in s14, but may be worth referencing again here.</p> <p><u>Transport</u></p> <p><u>General</u></p> <p>As stated in our pre-submission comments, the proposed NP appears to include one housing reserve site located off Beeby Road, Scraptoft. This site is currently subject to an outline planning application (14/01637), which is currently being considered by the highway authority in its role as statutory consultee in the planning process.</p> <p>As the suitability of this site in highways and transportation terms is already being considered as part of the planning application, we have no further comments to make on the NP.</p> <p><u>Sustainable Transport</u></p> <p>Any new development should be well connected by public transport to Leicester city centre. Good walking and cycling links should be provided within the village, to reduce the need for short journeys by car especially when walking to primary school.</p>
<p>Natural England (Sean Mahony)</p>	<p>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 has already commented on the Scraptoft neighbourhood plan proposal in response to a consultation from Scraptoft Parish Council on the draft neighbourhood plan. A copy of our response to that consultation is attached for ease of reference. The advice</p>

	<p>provided in our letter of 24 February 2015 to Scraptoft Parish Council applies equally to this consultation. Natural England does not consider that the plan poses any likely significant risk to internationally or nationally designated nature conservation sites and welcomes the broad principles of the plan and some of the specific policy proposals. It is consistent with the National Planning Policy Framework (NPPF) and set within the context of the Harborough Core Strategy. It also considers the potential impact of new development on the natural environment since its primary purpose is to manage the sustainable development of Scraptoft to preserve its character and environmental assets.</p> <p>We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.</p> <p>For any queries relating to the specific advice in this letter only please contact me on 0300 060 0571. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.</p>
<p>Sport England (Victoria Vernon)</p>	<p>Thank you for consulting Sport England on the above Neighbourhood Plan.</p> <p>Planning Policy in the National Planning Policy Framework identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.</p> <p>It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, 'A Sporting Future for the Playing Fields of England – Planning Policy Statement'. http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</p> <p>Sport England provides guidance on developing policy for sport and further information can be found following the link below: http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations. http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</p> <p>If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes. http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p>

<p>Thurnby and Bushby Society (Jim Rosenthal)</p>	<p>Policy S5: Landscape protection</p> <p>Policy S7: Area of Separation</p> <p>Policy S8: Countryside</p> <p>Policy S11: Biodiversity (especially concerning Thurnby Brook and the Dismantled Railway Line)</p>	<p>The Committee of the Thurnby and Bushby Society supports the Scraftoft Neighbourhood Plan, especially the following Policies which will also benefit Thurnby and Bushby Parish</p> <p>Policy S5: Landscape protection</p> <p>Policy S7: Area of Separation</p> <p>Policy S8: Countryside</p> <p>Policy S11: Biodiversity (especially concerning Thurnby Brook and the Dismantled Railway Line)</p>	
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Thurnby and
Bushby Parish
Council

The following is extracted from the unratified Minutes of the meeting of Thurnby and Bushby Parish Council held on Monday 13 April, which I am submitting on the Council's behalf:

Minute 15/95

It was reported that the Scraftoft Neighbourhood Plan has been submitted to HDC for examination and that a seven week period of consultation is underway, ending on Monday 11 May 2015. It was reported by the Clerk that, following detailed consideration of the pre-submission document, the Parish Council's comments had been taken into account in the final submission. It was RESOLVED that the Parish Council fully supports the Scraftoft Neighbourhood Plan, which appears to meet all basic conditions and legal requirements.