

Saddington Parish Neighbourhood Plan

Pre-submission Consultation Responses (Monday 20th November 2017 – Friday 12th January 2018) Final

No.	Chapter/ Section	Policy Number	Respondent	Comment	Response	Amendment
1	N/A	N/A	Natural England	Email dated 20-11-17. Natural England does not wish to comment on the plan.	Thank you for taking the trouble to read the NP.	None.
2	N/A	N/A	Historic England	Email dated 20-11-17. No comments provided. Advice given where to find information.	Thank you for taking the trouble to read the NP.	None.
3	N/A	N/A	National Grid	Email dated 20-11-17. No comments provided on draft plan.	Thank you for taking the trouble to read the NP.	None.
4	7.2	N/A	Saddington Resident	Additional information is provided on the value of ridge and furrow earthworks.	Thank you for this information. It will be used to enhance the description of Saddington's ridge and furrow archaeology.	An appendix added, to include the additional information on the value of ridge and furrow earthworks.
5	N/A	N/A	Saddington Resident	General editing comments provided in marked up copy of draft NP.	Thank you for taking the trouble to read the NP.	Minor edits, spelling and grammatical corrections will be incorporated in the Plan.
6	N/A	N/A	Highways England	Email dated 05-01-18. No comments on content of NP provided, other than to state that the small-scale nature of the planned growth will not impact upon the operation of the SRN.	Thank you for taking the trouble to read the NP.	None.
7	33-37		HDC	Natural and Historic Environment - much of the introductory text (pages 33-37) would be better placed in an appendix.	<p>The natural and historic environment is an important defining aspect of Saddington and this section provides much of the evidence that supports the subsequent policies. It is therefore considered appropriate to leave this information in the body of the NP.</p> <p>We will improve the clarity and prominence of the policies by grouping them at the end of the document.</p>	Improve the clarity and prominence of the policies by grouping them at the end of the document.

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	General	-	HDC	Suggest the description of existing community facilities/amenities (pages 56 – 59) is put in an appendix.	As above.	
		Policy H5 Policy H2, H3, H5	HDC	<p>It is not clear why Policy H5: Windfall Sites limits development proposals within Limits to Development to 2 dwellings per location. The effect of this is likely to be the development of large properties which the Neighbourhood Plan is seeking to discourage in favour of 3 or fewer bedroomed units.</p> <p>It also means that Policy H3 can, at best, deliver only one smaller unit on a site. Furthermore, Policy H5, with its 2 dwelling limit, is unnecessary and the criteria within it could be incorporated into Policy H2: Limits to Development which in effect covers windfall development. Relationship between policies H2, H3 and H5 should be considered further.</p>	<p>Policy H5 limits windfall development to 2 dwellings per location for two reasons: 1) the limited available space within the village of Saddington and 2) the allocation of two housing sites in the NP which promotes a relatively significant amount of housing for a small parish. It is by no means certain that this will result in larger homes. This assumes the availability of large sites within the limits to development.</p> <p>Each unit developed in conformity with policy H3 could be a small dwelling. If it were a two-unit development this would have to be two smaller units to meet the requirement of 'more than 50% of the units being 3-bed or fewer.</p> <p>We will combine policies H2 and H5 into one policy to clarify the intent.</p>	Combine policies H2 and H5 into one policy to clarify the intent.

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		Policy H7:	HDC	Tandem and backland development – this really repeats what is in policy H5 and ‘would cause harm to the local area’ is vague. It could be incorporated into a revised, comprehensive Policy H3.	Its purpose is to highlight a specific issue. The policy is the same as one which has passed examination and is a policy in the Harborough Development Plan, but we will combine H7 with policy H2 and H5 to clarify the intent.	Combine policy H7 with policy H2 and H5 to clarify the intent.
		Policy ENV1:	HDC	Area of Separation. The distances between Saddington village and Fleckney are such that there is no threat of coalescence. No justification is given for the Area of Separation as shown and development on the south western edge of Fleckney would be unlikely to impact unduly on the identity or distinctiveness of Saddington village. It is not reasonable to restrict the potential growth of Fleckney a Rural Centre (as defined in the Core Strategy and the Proposed Submission Local Plan) and as such a focus for rural growth, in this way. The aim of the area as defined would appear to be to restrict the growth of Fleckney rather than protect the village of Saddington.	Thank you for this comment. The purpose is to protect sensitive open space within Saddington Parish and to prevent coalescence, which could come from the building-out of either Saddington or Fleckney. It is proposed that the area of separation is extended to the built-up area of Saddington.	Redraw the area of separation to extend from the Saddington LtD to the Saddington parish boundary. Additional supporting evidence will be provided to clarify the intent of the AoS.
		Policy ENV7:	HDC	Ridge and Furrow – Suggest that the final sentence of the policy is unnecessary.	Agreed – this sentence will be removed.	Remove the sentence ‘In cases where development can be shown to be essential in principle, alternative (i.e. without ridge and furrow) development sites will be selected’.
		Policy BE2	HDC	Support for new employment opportunities – Why do new employment opportunities have to ‘Be well integrated into and complement existing businesses’ (criterion g)? This may be the case for the expansion of existing businesses but not for new businesses	This is important because the community wants new business development to be well integrated – this will apply to new businesses as well as existing ones.	None
	General	-	HDC	The community and Neighbourhood Forum should be complimented on the Reg 14 document. A great deal of hard	Thank you for this comment which is appreciated.	None.

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				work has gone into this document which strives to include policies with a local context.		
	General	-	HDC	It has been suggested in a couple of places that some of the text is put in appendices. There may be other instances where this would be appropriate. We consider this would make it easier to read and more succinct.	We agree that some information will be moved to make the document easier to read.	As stated above.
8	7.2.2	ENV 1	Fleckney Parish Council	The Parish Council has raised just one concern and that is regarding paragraph 7.2.2 and POLICY ENV 1. The concern regards the fact that you have only identified a small strip of land adjacent to the Fleckney Parish boundary as the area of separation. The Parish Council's view is that it should extend from the Fleckney Parish boundary, on both sides of the Fleckney Road, to the limits to development in Saddington Parish. This is in line with the representation made to Harborough DC on the new Local Plan which is set out below:	Thank you for this comment. It is proposed that the area of separation is extended from the Saddington/Fleckney boundary to the Saddington Ltd.	Redraw the area of separation to extend from the Saddington LtD to the Saddington parish boundary. Additional supporting evidence will be provided to clarify the intent of the AoS
		GD6	Fleckney Parish Council	<p>"GD6 Areas of Separation</p> <p>This section of the Plan sets out the policy where there is a potential risk of new development resulting in the coalescence of settlements and the establishment of areas of separation to ensure that development does not harmfully reduce the separation between settlements.</p> <p>Notwithstanding that reference is made to 'Other Areas of Separation may be added by future neighbourhood plans' it is the Parish Council's view that the area of land between the parish boundary to the south-east of the Village and the built area of Saddington Village, because of its importance to both settlements, should be designated as an area of separation.</p> <p>The designation of this area as an area of separation is necessary in order to prevent harmful development extending in to the open countryside and prevent merging of the two settlements to ensure that the identity and distinctiveness of both settlements is maintained as well as their landscape setting, built environment and the views</p>	Agreed. See above.	Redraw the area of separation to extend from the Saddington LtD to the Saddington parish boundary. Additional supporting evidence will be provided to clarify the intent of the AoS.

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				across open countryside."		
	Fig 6	-	Fleckney Parish Council	Just a minor point in the text where you refer to Figure 6 it should say "above" and not "below".	Noted thank you.	Amendment to the text to be made as recommended.
		-	Fleckney Parish Council	Also the paragraph on Allotments lacks clarity. I assume you are trying to say that Harborough has six allotment sites throughout the District one of which is in Saddington.	Agreed – the text will be amended as indicated.	Amendment to be made as proposed.
9	7.5.4	-	Saddington Resident	7.5.4 – I would not be in favour of the extension of the footpath to the allotments for parking purposes. Parking should be for allotment holders only. Maintenance of green spaces/bulb planting important, this area should not be turned into a general carpark. Agree that verges need repairing but should not be replaced with a footpath. Large farm vehicles/buses will mount pavements to pass other vehicles, any widening of the road will encourage further speeding problems.	Thank you for this. The policy says that improvement generally (the allotments are not specified) will be made 'where appropriate.' Agreement to where improvements are to be made	Clarify the intent by changing the paragraph to read: "The pedestrian footpath along Smeeton Road could be extended to improve pedestrian safety for access to the allotments and the cemetery. The grass verge in front of the allotments is in serious need of repair to make it safe for pedestrians to use."
		H1	Saddington Resident	H1- Agree that these are potential sites for housing, but the land off Weir road may have access problems as it is close to the corner. I also think 5 houses may be too many as privacy for existing residents need to be maintained. H2-Agree that any development must be small scale as the roads will not cope with increases in volume of traffic.	Thank you – we have reviewed the site off Weir Road and agree that it cannot support 5 houses. Policy H1 will be changed to specify up to 4 houses on Site 1. Noted.	Policy H1 is to be updated to state for Site 1: a) The development will provide for up to 4 dwellings; b) At least 3 of the dwellings should be of 3-bed or fewer and include accommodation suitable for older people;
10	6 (b)	-	Saddington Resident	Agree wholeheartedly with the sentiment to protect and enhance the natural and built environment. In my opinion these are the most important aspects of the plan and this could be emphasised.	Thank you for these comments. The emphasis in any NP is determined by the policies themselves rather than through emphasis in the text.	None.

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				Although transport is a separate section, any developments or improvements to the road infrastructure will increase traffic through the village, which is already at a dangerous level. However I do not think it realistic or necessary to improve cycling facilities in Saddington village itself (see below). Improvements to cycling on the surrounding roads would only be useful if as part of a co-ordinated and interconnected network. The sheer volume of recreational cyclists already passing through the village suggests this is probably unnecessary.	The NP policies call for improvement to cycle networks 'where appropriate' and 'if possible' so it remains an aspiration rather than a definitive policy requirement.	None.
	7.1.3	H1:	Saddington Resident	Agree with comments about limited development with Saddington and this site is appropriate. I have some concerns about effects of development at this site on traffic at the entrance to the village.	Noted. The site numbers are subject to review.	Update policy H1 to state that site 1 is suitable for up to 4 dwellings.
	7.1.10	H8	Saddington Resident	Agree completely about restricting light pollution from street lighting and new dwellings. Could this be applied to existing houses and other buildings?	No – it can only apply to developments that are subject to determination through the planning system.	None.
	7.2.2	Env 1	Saddington Resident	Agree completely about areas of separation. Is it possible to affirm that the current village boundary extends to the land adjacent to Fleckney? (i.e. prevent boundary changes)	The proposed area of separation extends to the boundary with Fleckney Parish.	None.
	7.2.9	Env 9	Saddington Resident	Green spaces- could cross-reference access to these i.e. green corridors mentioned as important open spaces under 7.2.5	Noted.	We will add in a sentence about the quality of the surrounding countryside and the benefit of being able to access it better/more easily.
	7.5.4	T1	Saddington Resident	As one who walks frequently through the village, I disagree with the suggestion that extensive changes to the footpaths are required. Further extension to the footpath from Cedar Cottage to the cemetery and allotments are not needed and would require pavements along with kerbs and drains. People do not drive to the cemetery or allotments because there are no footpaths; those who exercise can do so already.	The enhancement to the network of footpaths is a community action. The policy seeks to preserve the network, and to upgrade it if so doing reduces the reliance on cars, which is at the heart of this	None.

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				Agree that traffic is a major problem: volume, type and speed. This could be expanded and affirmed in that we really need to reduce the volume of traffic volume and size of vehicles, and actively discourage drivers from using Saddington as a cut-through route. Local developments at Kibworth have made this significantly worse in the last few years and this will only worsen unless specific measures are introduced. In fact, the congestion along Weir Road and to a lesser extent Smeeton Road helps limit the traffic speed there. I do not think further paths or cycleways are required (see above); it is much more important to curb traffic and its speed by whatever traffic calming means possible. Residents-only parking on or adjacent to the new village green, or on the ground at the entrance to Briars Close would be useful	comment.	
11		ENV10: Flooding	Anglian Water Services Ltd	Reference is made to new development including the provision of Sustainable Drainage Systems as part of its design. Anglian Water support the requirement for applicants to include the provision of Sustainable Drainage Systems (SuDS) so as not to increase flood risk and to reduce flood risk where possible. The use of SuDS would help to reduce the risk of surface water and sewer flooding.	Noted.	None.
		BE2: Support for new employment development, and BE5: Tourism	Anglian Water Services Ltd	Reference is made to development proposals for employment or tourism uses not having a significant impact on existing infrastructure including that provided by Anglian Water. We would suggest that development proposals in the parish should demonstrate that capacity is currently available within existing wastewater infrastructure or that capacity can be made available in time to serve the development.	Agreed. Introduction to the development sections to include this condition.	Add 'development proposals in the parish should demonstrate that capacity is currently available within existing wastewater infrastructure or that capacity can be made available in time to serve the development' to policy H2.
12	-	-	LCC	8 pages of general comments provided for consideration as appropriate to the NP	General comments noted.	None.

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13		H1 Residential Sites	Gladman Developments	<p>Gladman in this response do not discuss the individual merits of the proposed site allocations, as the SNP is able to allocate sites for specific purposes provided the basic conditions are met. It is however noted in the supporting text that the Housing Theme Group undertook a Sustainability Analysis of each site where the landowner had expressed a desire to developer their land. The Sustainability Analysis of sites, however, is notably absent from the consultation documents and brings into question the adequacy of this evidence to support the Plan and whether the sites selected are the most sustainable options for development. This is contrary to the requirements of the PPG which states that:</p> <p>“Proportionate, robust evidence should support the choices made and the approach taken. The evidence should be drawn upon to explain succinctly the intention and rationale of the policies in the draft neighbourhood plan or the proposals in an Order.”⁴</p> <p>Furthermore, it is noted that the combination of the two sites identified will only be able to deliver 8 dwellings. It is therefore unlikely that the Parish Council will be able to ensure the delivery of the Plan’s wider objectives such as affordable housing. Contributions for affordable housing should not be sought from developments of 10 units or less following the order of the Court of Appeal dated 13 May 2016, which give legal effect to the policy set out in the written ministerial statement of 28 November 20145.</p>	<p>Noted. The housing site selection process will be made available on submission of the NP to HDC. The housing site selection is based on achieving limited development of Saddington in line with the rural village designation.</p> <p>The statement questioning ‘whether the sites selected are the most sustainable options for development’ and citing this as a requirement of the PPG is wrong.</p> <p>A NP is able to ‘deliver the sustainable network they need’ (NPPF para183) and there is no requirement for the NP to allocate additional or alternative sites in order to meet the basic conditions.</p> <p>Whist it is not an obligation for there to be an affordable housing contribution on sites with fewer than 11 dwellings, the landowner has agreed to this provision.</p>	<p>Publish the Housing Site Assessment process with the NP.</p> <p>None.</p> <p>None.</p>
		H2: Limits to Development		<p>Whilst it is acknowledged that the current Development Plan defines limits to development, the SNP correctly acknowledges that the emerging Local Plan proposes to remove limits to development in favour of a criteria-based approach with regards to development within or contiguous with the existing or committed built up area. The approach</p>	<p>It is apparent, through a rudimentary search of Neighbourhood Plans that have been ‘Made’ within Harborough District and elsewhere, that the introduction of Limits to</p>	<p>None</p>

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				<p>taken which seeks to define settlements limits is therefore contrary to the advice issued by the Secretary of State. The PPG states that:</p> <p>“Neighbourhood plans, when brought into force, become part of the development plan for the neighbourhood area. They can be developed before or at the same time as the local planning authority is producing its Local Plan. A draft neighbourhood plan or Order must be in general conformity with the strategic policies of the development plan in force if it is to meet the basic condition. Although a draft neighbourhood plan or Order is not tested against the policies in an emerging Local Plan the reasoning and evidence informing the Local Plan process is likely to be relevant to the consideration of the basic conditions against which a neighbourhood plan is tested. For example, up-to-date housing needs evidence is relevant to the question of whether a housing supply policy in a neighbourhood plan or Order contributes to the achievement of sustainable development. Where a neighbourhood plan is brought forward before an up-to-date Local Plan is in place the qualifying body and the local planning authority should discuss and aim to agree the relationship between policies in:</p> <ul style="list-style-type: none"> ☐ The emerging neighbourhood plan ☐ The emerging Local Plan ☐ The adopted development plan with appropriate regard to national policy and guidance. <p>The local planning authority should take a proactive and positive approach, working collaboratively with a qualifying body particularly sharing evidence and seeking to resolve any issues to ensure the draft neighbourhood plan has the greatest chance of success at independent examination. The local planning authority should work with the qualifying body to produce complementary neighbourhood and Local Plans. It is important to minimise any conflicts between</p>	<p>Development is within the scope of a neighbourhood plan irrespective of the continuation of such a policy in the Local Plan. This is accepted by HDC Planners and Examiners alike. Please see Made NPs including Hungarton; Foxton; Kibworth and Great Easton in Harborough District alone for confirmation of this.</p> <p>The SNP designating a Limits to Development is therefore not contrary to the advice issued by the Secretary of State as stated.</p>	

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				<p>policies in the neighbourhood plan and those in the emerging Local Plan, including housing supply policies. This is because section 38(5) of the Planning and Compulsory Purchase Act 2004 requires that the conflict must be resolved by the decision maker favouring the policy which is contained in the last document to become part of the development plan. Neighbourhood plans should consider providing indicative delivery timetables, and allocating reserve sites to ensure that emerging evidence of housing need is addressed. This can help minimise potential conflicts and ensure that policies in the neighbourhood plan are not overridden by a new Local Plan.”⁶ (Our emphasis)</p> <p>It cannot be said that the emerging SNP has regard to the direction contained in the emerging Local Plan which is due to be submitted for Independent Examination. The SNP should ensure that flexibility and the need for contingency is included in the wording of the above policy through a criteria-based approach to ensure that the Neighbourhood Plan is able to accommodate the needs of the community over time and not prevent the delivery of further sustainable growth opportunities which can be delivered in nearby settlements such as Fleckney.</p>		
		H3: Housing Mix		<p>In principle, Gladman recognise the general thrust of this policy which seeks to ensure development proposals provide an appropriate mix of new housing types. However, housing mix will inevitably change over a period of time and this policy should seek to ensure a greater degree of flexibility going forward so that the Plan is able to positively respond to changing market conditions. Accordingly, this policy should make reference to the ‘latest Strategic Housing Market Assessment’ available, rather than basing its evidence on 2011 Census data which is unlikely to provide an up-to-date assessment of Saddington’s housing needs. Furthermore, it is recommended that the statement “<i>Development should</i></p>	<p>The policy as written is in line with community requirements as evidenced by the feedback from the community questionnaire and consultation events that showed majority support for 3 bed or fewer housing instead of larger houses. This is against a background of there being no need for large scale developments .</p> <p>However, we can accept that</p>	<p>After the existing text of H3, add: All proposals will be expected to demonstrate how the proposal will meet the current and future housing needs of the parish as evidenced in the Parish Housing Needs Survey Report 2016 and the Leicester and Leicestershire Housing and Employment Development Needs Analysis 2017 or any more recent document updating either of</p>

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				<i>deliver more than 50% of the units as 3-bed or fewer</i> is deleted as this is not supported by any robust or proportionate evidence as advised by the PPG.	there should be flexibility in the future to adapt to identifiable changing needs and the policy could therefore be extended to allow for future changes in housing need.	these reports.
		H5: Windfall Sites		<p>The above policy seeks to limit the delivery of windfall sites to proposals of up to 2 dwellings per location within the limits to development. In addition to the comments made in response to policy H2, it would be inappropriate to cap development to such a small number which will offer no ability to meet the plan's wider objectives such as the delivery of affordable housing or assisting in the delivery of essential infrastructure in the neighbourhood plan area.</p> <p>Gladman therefore recommend that this policy is deleted given the stance taken in the emerging Local Plan and its approach that development opportunities which are well related to existing settlement fringes will be allowed.</p>	<p>The NP proposes allocations of housing that exceed the LPA's minimum requirement and so it is reasonable to restrict further development as proposed.</p> <p>See also the response to 7 above.</p>	None.
		ENV1: Area of Separation		<p>Policy ENV1 defines an area of separation to retain the physical and visual separation between Saddington and Fleckney. The proposed area of separation is not related to Saddington and only serves to prevent the future expansion of Fleckney which is in direct conflict with the PPG which states <i>"all settlements can play a role in delivering sustainable development in rural areas – and so blanket policies restricting housing development in some settlements and preventing other settlements from expanding should be avoided unless their use can be supported by robust evidence"</i>7.</p> <p>Gladman submit that Policy ENV1 is contrary to basic conditions (a) and (d) and should be deleted.</p>	<p>There are many reasons that the NP proposes an area of separation between Saddington and Fleckney, including:</p> <p>a. To prevent harmful development extending into the open countryside. For example harm will be caused by extending the linearity of Fleckney's housing into Saddington as the site is too far away from the centre of Fleckney for residents to walk to the shops or to the school, thereby creating far more traffic than if the housing is</p>	Redraw the area of separation to extend from the Saddington LtD to the Saddington parish boundary. Additional supporting evidence will be provided to clarify the intent of the AoS

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					<p>located closer to the centre of Fleckney, and it is not safe for cycling due to traffic levels. By creating an area of separation Saddington is contributing to sustainable development because it encourages Fleckney's new housing to be located closer to the centre of the village.</p> <p>b. To prevent satellite settlements of Saddington being created that are totally disconnected from the main settlement and which are unsustainable by Saddington.</p> <p>c. If Fleckney is to expand there are other more sustainable sites within Fleckney parish to accommodate such expansion.</p> <p>d. To prevent merging of the two settlements in order to ensure that the identity and distinctiveness of both settlements is maintained as well as their landscape setting, built environment and the views across open countryside.</p> <p>e. This policy is wholly supported by Fleckney Parish Council.</p> <p>f. Within the term of the NP (2018-2031) Saddington has identified housing sites that can provide sustainable housing</p>	

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					development in Saddington, and which will provide housing in excess of that required by the Core Strategy or Local Plan and therefore Saddington is meeting the basic conditions of NPPF.	
		ENV2: Local Green Spaces		<p>Gladman do not have any areas of land that they wish to identify for consideration as Local Green Space (LGS) designation, however take this opportunity to remind the Parish Council of the tests which need to be met when seeking to designate LGS. Paragraph 77 of the Framework sets out the following in terms of when it is appropriate or not to designate land as a Local Green Space. It states that:</p> <p>“The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used:</p> <ul style="list-style-type: none"> ☐ Where the green space is in reasonably close proximity to the community it serves; ☐ Where the green area is demonstrably special to a local community and holds particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and ☐ Where the green area concerned is local in character and is not an extensive tract of land.” <p>The Planning Practice Guidance (PPG) provides further guidance on LGS designations including paragraph ID. 37-015-20140306, <i>“There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgement will inevitably be needed. However, paragraph 77 of the National Planning Policy Framework is clear that Local Green Space Designation should only be used where the green area concerned is not an extensive tract of land.</i></p> 	Noted. The proposed LGS designations have been tested against the NPPF criteria and this is available in the supporting information.	None.

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				<p><i>Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name."</i></p> <p>It is noted that no evidence has been prepared to support the proposed designations and the Plan is therefore not supported by proportionate and robust evidence as required by the PPG.</p>		
		ENV3: Protection of sites and features of environmental significance		<p>The above policy identifies 29 sites which are considered as being locally significant for biodiversity, history and are considered to be locally valued by residents.</p> <p>However, the supporting text confirms that "because their community value scores are not high enough they are not eligible for Local Green Space designation." It is also concerning that the emphasis of this policy is very much on 'protection' of these sites rather than seeking to integrate existing environmental features with sustainable development opportunities within the neighbourhood plan area.</p> <p>Furthermore, Gladman note that the policy refers to Appendix 5 which provides the evidence to support the above policy. Appendix 5 is notably absent from the consultation documents and we therefore reiterate that the plan is not supported by proportionate and robust evidence as required by national guidance.</p>	<p>This is an inaccurate and misleading interpretation of what the community is seeking to achieve with this policy.</p> <p>The supporting text does exactly that – identifies the significant features of the sites but does not designate them as LGS. The emphasis is not on protecting the sites but on protecting the identified features of the sites – an important distinction.</p> <p>Appendix 5 was published on Saddington's NP public website for the duration of the consultation period and was therefore always available to Gladman. Appendix 5 will be available with the submission version of the NP.</p>	None
		ENV7: Ridge and furrow		The above policy seeks to designate ridge and furrow identified in Figure 13 as non-designated heritage assets.	The policy in question requires the 'demonstrable benefits of	None

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				<p>Gladman take this opportunity to inform the Parish Council that ridge and furrow is often truncated by modern farming practices. In addition, this policy is again not supported by any evidence to demonstrate that those areas identified are of particular significance. Indeed, the guidance published by Historic England (HE)⁸ states at paragraph 12:</p> <p>“While local heritage listing can be a legitimate response to an actual or perceived threat to a heritage asset, including the threat of demolition, the level of protection afforded is influenced by the manner in which the local heritage list is prepared. The sounder the basis for the addition of an asset to the local heritage list – particularly the use of selection criteria – the greater the weight can be given to preserving the significance of the asset.</p> <p>The degree of consultation on the list and the inclusion of assets on it also increases that weight...” (Our emphasis)</p>	development to be balanced against the significance of the ridge and furrow feature, thereby satisfying the guidance of Historic England as quoted by the respondent.	
		ENV8: Important views		<p>This policy seeks to ensure that development proposals respect the open views and vistas identified in Figure 14. Whilst acknowledging that these views may be valued by the local community, this policy should be supported by robust evidence and allow a decision maker to come to a view as to whether a particular location contains physical attributes that would <i>‘take it out of the ordinary.’</i> Local residents may raise particular concerns with development on the edge of Saddington and/or Fleckney that forms an area of accessible countryside and therefore contributes to an area’s pleasant sense of openness. However, the presence of views across an area to open countryside cannot on their own amount to a landscape which should be protected.</p>	The policy does not seek blanket protection against development as is inferred, but rather to ensure that development respects open views and vistas that are valued by the community.	None.
		Site Submission		<p>As the Parish Council will be aware, Gladman are promoting land east of Fleckney Road, for residential development. The 7.14 ha site lies adjacent to existing residential development on the edge of Fleckney within the parish of Saddington. It</p>	Noted. The statement that the SNP fails to meet the basic conditions is based on an apparent misunderstanding of	None.

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				<p>presents an ideal opportunity to create a sustainable, high quality residential development in a sought-after location. Residential development on the site would incorporate up to 130 dwellings, 30% of which would be affordable housing (of a variety of types, from affordable rented properties to discounted sale properties to help key workers and first-time house buyers). This will help to meet the identified need for affordable housing and starter homes.</p> <p>A copy of the Development Framework plan (submitted with a planning application to Harborough District Council) can be found at Appendix 1 of this submission, showing how development could be accommodated on site. The site is located on the south-eastern edge of Fleckney, within Saddington Parish and represents a logical extension to Fleckney. The development would be supported by the facilities in Fleckney as it is considered a highly sustainable settlement and capable of accommodating growth. Residents will have direct access to community facilities such as a pub, health centres, a take away, a newsagent with a Post Office and a primary school. The development offers a range of benefits such as investment in the local community, new areas of public open space and a children’s play area, improvements to biodiversity, an onsite Sustainable Drainage System (SuDS) and economic gains in the form of CIL payments and s106 contributions. The average resident annual expenditure is estimated to be £3.9m, some of which will be retained in the Fleckney and Saddington areas ensuring future vitality and viability.</p> <p>The landscape features of the scheme will be retained and reinforced to maintain a suitable gap between Fleckney and Saddington, whilst creating an aesthetically softer edge to Fleckney than the current industrial estate. Gladman consider that the site is in a sustainable location and is available, achievable and deliverable.</p>	<p>neighbourhood planning and its relationship with local, national and EU strategic planning policies.</p> <p>Saddington’s NP is being developed to ensure that sustainable housing can be provided in Saddington parish commensurate with its obligations under the Core Strategy and the evolving Local Plan.</p>	

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				<p>Gladman consider that the site should be included in the SNP as it provides a sustainable location for future growth on the edge of Fleckney. There is opportunity for Saddington Parish to work closely with Fleckney Parish Council in order to achieve sustainable development across the two closely linked parishes, in allocating land east of Fleckney Road.</p> <p>More information regarding the site proposals can be found on the Harborough District Council website under planning application reference 17/01860/OUT.</p>	<p>All residents of Saddington were consulted and invited to identify land within the parish that they considered to be suitable for housing development. The site being proposed by Gladman was not put forward for consideration and is outside the Limits to Development.</p>	
	Conclusions			<p>Gladman recognises the role of the neighbourhood plan as a tool for local people to shape the development of their local community. However, national guidance is clear that these must be consistent with national planning policy and the strategic requirements for the wider authority area. Through this consultation response, Gladman has sought to clarify the relation of the SNP as currently proposed with the requirements of national planning policy and the wider strategic policies for the wider area.</p> <p>Gladman is concerned that the plan in its current form does not comply with the basic conditions. Accordingly, the Parish Council should consider the issues raised in these representations and ensure that the policies which do not comply with national policy and guidance are amended to ensure the Plan can be found in conformity with the basic conditions.</p>	<p>Saddington's NP has followed a rigorous process that complies with the NP regulations, and we have carried out extensive consultation with residents and stakeholders to ensure that we comply with statutory and regulatory requirements. Our proposed policies have been developed using the NPPF as one of the key regulatory requirements.</p> <p>We cannot therefore agree with your general observation that we are non-compliant.</p>	None.
14.	General		Saddington Resident	<p>I cannot find fault with this plan as I believe it takes into careful consideration all aspects of what the village community requires together with the wider social need. I feel it strikes a good balance of maintaining the village aspect of life which current and future residents want and move here for and also providing a sensible and realistic "quota" of housing stock. We are a small village and people move to Saddington for the small village community not for anything</p>	<p>Thank you for this helpful comment.</p>	None.

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				else.		
15.		Refer to Persimmon response	Persimmon Homes	<p>INTRODUCTION</p> <p>Firstly, Persimmon Homes North Midlands (PHNM) would like to congratulate Saddington Parish Council on its efforts to produce a Neighbourhood Plan for the local community and in reaching this key milestone of producing a draft Plan.</p> <p>We do however have some serious concerns regarding the process and content of the Plan and we wish to bring these issues to your attention so they can be addressed prior to Examination.</p>	Thank you for taking the time to comment on our NP.	
				<p>LEGAL REQUIREMENTS</p> <p>A Neighbourhood Plan has to meet the Basic Conditions set out in paragraph 8(2) of Schedule 48 to the Town & Country Planning Act 1990 and in relation to Neighbourhood Plans by Section 38A of the Planning & Compulsory Purchase Act 2004. PHNM consider the SPNP fails to meet a number of the Basic Conditions as follows:</p>	Noted.	None.
				<p>1. <u>A failure to have regard to the National Planning Policy Framework (NPPF), contrary to Basic Condition 8(2)(a).</u></p> <p>The Basic Conditions are mandatory tests and in examining the plan, an examiner has a duty to assess the consistency of each Neighbourhood Plan Policy with National Planning Policy, taking account of the fact that the NPPF must be read as a whole. The particular concern at Saddington relates to the failure to apply National Planning Policy on housing delivery under NPPF Paragraph 47 and its accompanying paragraphs 15, 16, 17, 49, 156, 158 and 184.</p> <p>Paragraph 15 confirms that the requirement extends to Neighbourhood Plans “<u>all plans</u> should be based upon and</p>	<p>Saddington’s NP has followed a rigorous process that complies with the NP regulations, and we have carried out extensive consultation with residents and stakeholders to ensure that we comply with statutory and regulatory requirements.</p> <p>Our proposed policies have been developed using the NPPF as one of the key regulatory requirements.</p>	None

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				<p>reflect the presumption in favour of sustainable development, with clear policies that will guide how the presumption should be applied locally.”</p> <p>Paragraph 16 then confirms that:</p> <p><u>“The application of the presumption will have implications for how communities engage in neighbourhood planning. Critically, it will mean that neighbourhoods should:</u></p> <p><u>Develop plans that support the strategic development needs set out in local plans, including policies for housing and economic development</u>”</p> <p>NPPF paragraph 184 also confirms that “neighbourhood plans must be in general conformity with the strategic policies of the local plan.” This includes the housing requirements and Areas of Separation for the local plan, in this case the Harborough District Core Strategy.</p> <p>There is an inherent need to boost housing supply and promote sustainable development. The use of the Area of Separation as per SPNP Policy ENV1 is restrictive and inhibits Fleckney’s accommodation for growth as a Rural Centre.</p>	<p>The strategic policies of the Local Plan categorise Saddington parish as a sub-selected rural village that has no housing allocation, and where development is to be strictly controlled. Our policies have been developed against these criteria alongside national policies and the emerging Local Plan.</p> <p>We can only consider matters within the Saddington parish. There are ample development sites in Fleckney for it to meet and exceed its housing delivery requirements as a Rural Centre.</p>	
				<p>2. A failure to have regard to the contribution to the achievement of sustainable development contrary to Basic Condition 8(2)(d)</p> <p>Alongside Basic Condition 8(2) (a), Basic Condition 8(2) (d) requires that ‘the making of the [neighbourhood plan] contributes to the achievement of sustainable development’. From PHNM’s perspective, Policy ENV 1 is contrary to this Basic Condition as it risks stifling the achievement of sustainable development in Fleckney, which has ‘the services to support its continued designation as a Rural Centre and a range of additional services, facilities and employment opportunities’</p>	<p>Within the term of the NP (2018-2031) Saddington has identified housing sites that can provide sustainable housing development in Saddington, and which will provide housing in excess of that required by the Core Strategy or Local Plan and therefore Saddington is meeting</p>	None

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				<p>(Fleckney Settlement Profile 2015, Harborough District Council). Furthermore Fleckney has a large amount of housing land availability and the capacity to accommodate such growth in what is a highly sustainable location. However, we acknowledge that the Saddington Parish boundary runs to the edge of Fleckney; but despite this our site would form part of the urban fringe of Fleckney in practical landscape terms. Therefore more thought should be given to allow for more than small scale development when related to development adjacent to Fleckney. By proposing an Area of Separation in this location it becomes restrictive and affects the growth of Fleckney.</p> <p>PHNM's site at Fleckney Road, Fleckney is identified as part of the 'Fleckney Lutterworth Lowlands LCA' which is of medium sensitivity and value in landscape terms. As identified in Harborough Rural Centres Landscape Character Assessment (2014), Fleckney – along with Lutterworth and Kibworth – has the capacity and infrastructure to allow for further development, within or adjacent to their current urban envelopes. Therefore it can be seen that the proposed Area of Separation is restrictive to our site which is of medium to medium-high capacity for development (as found in The Landscape Partnership Study 2017) and has been promoted for allocation within the emerging Local Plan.</p> <p>There is a need for additional housing in the emerging local plan and the final allocation of sites for Fleckney has yet to occur. We propose that the Neighbourhood Plan allocates our site for housing, reflective of the strategic role of Fleckney and strategic housing needs which must be accommodated by the settlement. As a minimum the NP, should not unnecessarily restrict, Fleckney in contributing to meet strategic and local needs.</p>	<p>the basic conditions of NPPF.</p> <p>We can only consider matters within the Saddington parish. There are ample development sites in Fleckney parish for it to meet and exceed its housing delivery requirements as a Rural Centre.</p>	

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				<p>3. <u>A failure to have regard to the making of the Neighbourhood Plan in general conformity with the strategic policies contained in the development plan, contrary to Basic Condition 8(2)(e).</u></p> <p>Basic Condition 8(2) (e) states that ‘the making of the [neighbourhood plan] 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)’. PHNM’s view is that the SPNP does not conform to the strategic policies of the adopted Core Strategy in relation to its proposed designation of Area of Separation.</p> <p>Policy CS2 of the adopted Core Strategy requires the provision of at least 7,700 dwellings across the Harborough District between 2006 and 2028. Saddington is categorised as a Selected Rural Village, which along with Rural Centres are to provide at least 2,420 homes over this period. Policy H1 of the SPNP is restrictive and allocates at only a minimum of 7 dwellings which does not reflect the District’s strategy. Furthermore Policy CS2 of Harborough District’s Core Strategy includes a mechanism which allows housing outside the Limits to Development if a 5YHLS cannot be demonstrated. The SPNP makes no reference to this mechanism. At this time, Harborough do not have a 5YHLS, but the use of ENV1 in the SPNP would restrict the success of policy CS2 working at Fleckney. Lastly, the proposed Saddington Area of Separation is not identified within the adopted Core Strategy.</p> <p>Policy GD6 of Harborough District’s emerging Local Plan (eLP) designates two Areas of Separation – Market Harborough and Great Bowden, and Lutterworth, Bitteswell and Magna Park. The Area of Separation proposed is not identified and there is no evidence stating why this should be the case. On the contrary, the evidence base identifies our site on the edge of Fleckney</p>	<p>In both the Adopted Core Strategy and the evolving Local Plan, Saddington is not a Selected Rural Village – it is a Rural Village where development is to be strictly controlled, and has no defined contribution to the housing supply. Within the term of the NP (2018-2031) Saddington has identified housing sites that can provide sustainable housing development in Saddington, and which will provide housing in excess of that required by the Core Strategy or Local Plan and therefore Saddington is meeting the basic conditions of NPPF.</p> <p>We can only consider matters within the Saddington parish. There are ample development sites in Fleckney parish for it to</p>	<p>Publish the Consultation Plan with the NP.</p>

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				<p>as having capacity for development.</p> <p>It is queried as to whether the SPNP should be identifying Areas of Separation as this is a strategic policy that should be the responsibility of the eLP. By addressing it via neighbourhood plans it has the potential to prevent strategic needs being met (i.e. housing) – designating such gaps require robust evidence that is produced and tested.</p> <p>The buffer drafted for the SPNP is not really about protecting Saddington from coalescence with Fleckney but as more of a direct attempt to prevent sustainable development on our site. Should the Parish Council wish to protect the setting of Saddington it could do so in a much more logical way that would potentially comply with the basic conditions.</p> <p>In addition the plan suffers from two other major failings:-</p> <ol style="list-style-type: none"> 1. <u>It is not supported by appropriate evidence.</u> <p>Guidance on Neighbourhood planning in NPPG paragraph 041 is clear that a policy in a neighbourhood plan “should be concise, precise <u>and supported by appropriate evidence.</u> It should be distinct to reflect and respond to the unique characteristics and planning context of the specific neighbourhood area for which it has been prepared.” Other than the mention of ‘a number of English Local Planning Authorities’, there is no evidence to support policy ENV 1. Therefore, there is no explanation of the justification and planning context of the Area of Separation to support these policies.</p> <p>As stated above, we do not consider that there is any need for an AOS in this location.</p> <p>ENV 1 – Area of Separation</p>	<p>meet and exceed its housing delivery requirements as a Rural Centre.</p> <p>The designation of open space is a common feature of neighbourhood plans, including those within the Harborough district. The statement therefore that this is a strategic policy the responsibility of the LPA is inaccurate and not based on an understanding of the role and remit of neighbourhood plans.</p> <p>The NP plan is supported by evidence for all policies that have been drafted. This can be found on our Neighbourhood Plan website. Additional evidence will be published with the Submission version of the NP.</p>	

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				<p>Policy ENV1, addresses Area of Separation. The introduction, (page 4 of the document) states:</p> <p>“Our vision for the next 15 years is the new development proposals to be shaped in such a way that Saddington manages its independent rural identify and locality, district from adjacent settlements.” (my emphasis)</p> <p>It goes on to note on page 11, that:</p> <p>“Robust evidence is the foundation on which a Neighbourhood Plan has to be based”</p> <p>Figure 6 shows a proposed ‘Area of Separation’ designation on land contiguous with the southern boundary of Fleckney. Whilst the western boundary of the designation follows a mature hedgeline, the eastern boundary does not follow any physical feature on the ground, nor does the southern boundary. Examination of the draft Neighbourhood Plan does not reveal any evidence as to the rationale adopted concerning the extent and limit of this designation.</p> <p>Furthermore, the policy is redundant as this particular area of land is already covered by Policy H2 which states:</p> <p>“New development in the area contiguous with the southern boundary of the built up area of Fleckney but within Saddington parish (and within the designated Saddington Parish Neighbourhood Area – refer to Figure 1) would encroach on open countryside that is otherwise protected by the Saddington Limits to Development policy (H2).</p> <p>“Policy H2: limits to development – within the defined limits to development as shown in Figure 4, development proposals for small scale infill</p>		

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				<p>development and conversion of existing buildings will be supported where it:</p> <ul style="list-style-type: none"> a) Reflects to size, character and level of service provision of Saddington; b) Helps to meet a clearly identified need in Saddington Parish; c) Retains existing natural boundaries such as trees, hedges, boundaries and streams which; d) Maintains important views and vistas; e) Retains and where possible, enhances the distinctive qualities of the special and attractive landscape in which Saddington is situated. f) Preserves and where possible, enhances the setting of any heritage assets would be affected by the proposal; g) Preserves and where possible, enhances the Saddington Conservation Area.” <p>When each of the parameters of this policy are considered and the policy is read in the round it is apparent that policy would maintain separation of Fleckney and Saddington and therefore policy ENV 1 redundant and not necessary.</p> <p>Policy ENV 1 notes that the Area of Separation designation is to retain both the physical and visual separation between Saddington and Fleckney.</p> <p>A physical separation distance of in excess of 650m currently exists between the two settlements. The explanatory text to the policy is concerned with any development which would reduce the distance between the settlements to less than 600m because at</p>	<p>It is odd to be saying on the one hand that the policy does not comply with the basic conditions whilst on the other that it is not needed because it is covered in</p>	

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				<p>that distance such development would be in 'easy' viewing range from Saddington.</p> <p>The reference to 600m shows that there is already an acceptance that some development could occur within the gap.</p> <p>Clearly in physicality terms some development could occur with the gap and the separate identity of the settlements and communities would be retained.</p> <p>Visibility as a concept has a two way dimension, as intervisibility is the view both to and from something. In terms of views from the edge of Fleckney southward towards Saddington, such views can be appreciated from the Fleckney Road at the arrival point to the village and several public rights of way, reference (287/2) and 287/1, the east west bridleway and the north-south route A14/9 and A14/10. In general terms when looking south, one sees the countryside in middle and in the far distance. Saddington is situated on locally high ground at the eastern end of a broad ridge and as a result is easily seen and perceived as a settlement when viewed to the east-south and west of this village. However Saddington sits mainly on the south-east facing slope of this ridge and as a consequence only a few properties can be seen from Fleckney itself. A stranger to the area looking south from Fleckney would have the perception of a few farm houses rather than perceive a village. With residential development in place adjacent to Fleckney in the designation Separation Area this perception would remain unchanged.</p> <p>In terms of views from Saddington looking north towards Fleckney settlement, such public views can be appreciated from the Fleckney Road at its arrival point</p>	<p>another policy. The retention of the policy (revised to extend the area to Saddington itself) is an additional element to reinforce the importance of the area within the context of the Parish.</p>	

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				<p>to the village and several public rights of way, reference A14/8 and the Y3A/1. From these footpaths, the foreground and middle distance is characterised and dominated by the rural landscape. In the far distance, the Fleckney industrial estate is clearly visible, partially screened by a young mature tree belt. The existing Badstock housing estate on the southern side of Fleckney is also visible forming a distinct well defined edge to the settlement. The existing hedgerows only screen this housing to a limited degree. Any development in the Separation Area would sit' in front' of the settlement edge. The sense of visual separation of seeing Fleckney in the far distance would leave the sense of visual separation materially unchanged.</p> <p>Saddington can be readily perceived as a village and settlement when seen from the surrounding countryside located to the south and to the east of the settlement and to a degree also from the west. This is because it is situated on local high ground but lies on the eastern and southern slopes of a local ridge and area of high ground. As a consequence when viewed from the countryside which lies to the north of the settlement looking south towards it, the vast majority of the settlement lies on the far dip slope and as a consequence there is no real evidence that a settlement is present. Evidence of built form relates to a couple of properties that appear as farmsteads on the horizon in and amongst the dense tree cover. As such in terms of views from the land to the north there is no perception of a settlement of the scale and size of Saddington.</p> <p>If Saddington were to expand with development located on the northern edge of this village, it would</p>		

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				<p>inevitably descend down the lower north facing slope and would be highly visible from the landscape to the north.</p> <p>This would materially change the perception of the existing relationship between these two villages as Saddington would now appear as a village on the high ground. It is therefore the landscape which wraps around the northern part of the village which is most sensitive to change how the two settlements are currently perceived in terms of their visual relationship.</p> <p>Consequently it is the area wrapping around the northern part of the settlement that has logic in being subject to a Separation Area Policy – if indeed this was necessary. It is this area to the north of Saddington rather than the landscape immediately to the south of Fleckney which would materially change the visual relationship between the two settlements and justifiably be protected.</p> <p>To summarise the illogicality of the AOS policy, it suggests that Saddington could expand down to the AOS boundary without there being a harmful impact on the perceived gap between Saddington and Fleckney – however it is this area which is most sensitive to development.</p> <p>Notwithstanding this analysis Policy ENV 1 is not necessary and obsolete with Policy H2 in place.</p>		
				<p>2. <u>There has been no consultation with Developers</u></p> <p>NPPG 048 says “other public bodies, land owners and the development industry should be involved in preparing a draft neighbourhood plan or order.” PHNM are a developer and our site is a potential</p>	<p>Saddington has no expectation of large scale development within the parish and therefore did not attempt to consult with</p>	<p>Publish the Consultation Plan with the NP.</p>

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				<p>development site in the Parish but we have not been invited to or engaged in any of the consultation event over the course of the past year. Therefore, we are disappointed by the creation of Policy ENV 1 as an attempt to prevent development that could potentially be allocated, and that we have not had an opportunity to discuss this at an earlier stage of the plan-making process. Our site is a suitable housing site and our hopes and expectations are that is allocation within the eLP. We would welcome not only the opportunity to discuss this matter prior to the submission of the SPNP for examination, but also the chance to discuss the substantial benefits accommodated from our site to the local area.</p>	<p>major housing development companies. It has assessed available sites within the parish in and adjacent to the built-up area and has consulted in full throughout.</p> <p>Saddington’s NP has followed a rigorous process that complies with the NP regulations, and we have carried out extensive consultation with residents and stakeholders to ensure that we comply with statutory and regulatory requirements. All landowners in Saddington parish have been notified of the evolving NP and have been invite to public consultation events, and we would expect landowners would involve any partner development company in the consultation process. The Consultation Plan will be published with the NP.</p>	
				<p>CONCLUSION</p> <p>1. The Saddington Parish Neighbourhood Plan does not meet the legal requirements of the Basic Conditions. We have significant concerns regarding the plan and therefore we request an Examination is held where we can attend and discuss with the Examiner.</p>	<p>We believe that the NP has been developed in compliance with Basic Conditions and we cannot therefore agree with your general observation that we are non-compliant. The NP regulations do not provide an option for an Examination where PHNM could</p>	<p>None.</p>

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					discuss the NP with the Examiner. The presumption is that NP Examinations are held through written representation only.	