



Hinckley & Bosworth
Borough Council

Hinckley and Bosworth Borough Council Consultation Response to the Stoke Golding Neighbourhood Plan Pre-Submission Draft (Regulation 14)

Neighbourhood plans are not required to meet the tests of soundness which local plans and other development plan documents must meet. Instead, in order for them to be able to be put to referendum, they must meet the 'basic conditions' set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990. Those relevant to neighbourhood plans are as follows:

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

(d). the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.

(e). the making of the order (or 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).

(f). the making of the order (or neighbourhood plan) 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 (or neighbourhood plan).

This consultation response aims to highlight where policies of the Stoke Golding NDP require modification in order to be in full conformity with the basic conditions.

Points (f) and (g) above relate to certain obligations which plans must adhere to, primarily in relation to habitats and environmental impacts. Some plans require a Strategic Environmental Assessment and/or a Habitat Regulations Assessment. Stoke Golding NDP undertook a screening and it was determined that a full HRA was not required but that an SEA was required to comply with this basic condition.

Comments are provided below on the NDP policies which aim to ensure that the policies in their final form are workable and can be implemented to their full effect, ensuring that they contribute to the achievement of sustainable development.

Detailed comments

Policy reference / Page number	HBBC comments
Map 1	The colours of the Parish boundary and Neighbourhood Plan (NP) boundary are very similar. Consider changing to make the two boundaries more distinctive.
1.6	<p>To be precise, the NP must be in “general conformity” with the Development Plan for the area, which is a sterner test than “have regard to” applicable to the NPPF and NPPG.</p> <p>Hyperlink goes to Schedule 9 of the Localism Act 2011 when the basic conditions are set out in Schedule 10 (8(2)).</p>
1.33	<p>From the point of view of planning officers dealing with planning applications they will know that all the policies of a “made” NP have to be considered in decision making as the NP forms part of the development plan. As such, paragraph 1.33 is not strictly necessary for decision making.</p> <p>Also, in line with the Planning Acts, decisions can be made contrary to the development plan where material considerations indicate otherwise, and on all planning applications a planning balance has to be applied such that proposals can be contrary to some policies but the benefits of a scheme may outweigh the harm.</p> <p>HBBC suggests the paragraph is either deleted or caveated to recognise other material considerations and the planning balance. Replacing “...will be applied.” With “...will be considered” would help.</p>
Vision. P11.	Concise easy to understand infographic of the SGNP vision.
4.11 – 4.12 housing requirement	<p>In terms of the Neighbourhood Plan’s method of calculating Stoke Golding’s housing requirement, there is a simple logic to extrapolating the 3 dwellings per annum of the Core Strategy as a minimum, and the Leicestershire Growth Plan (2018) has a very similar annual housing requirement for HBBC as the Core Strategy (2009). However, it is now necessary to calculate housing requirements in line with the “Standard Method” of the Ministry of Housing Communities and Local Government (MHCLG). As a first step, HBBC has used the Standard Method to calculate a borough wide housing need of 8,588 dwellings for the period 2020-39. HBBC have recommended an approach to setting a housing requirement for neighbourhood plans of apportioning this across the borough by population.</p> <p>So If this need is apportioned to parishes according to population based on the Mid-Year Estimates of 2017, Stoke Golding’s housing need would be 144 dwellings for 2020-39. HBBC have also recommended that neighbourhood plans include an additional buffer to give flexibility to the plan. For example this would help if sites did not come forward for development as anticipated and/or if the local plan, once adopted, set a different housing requirement for the parish. A 10% buffer has been recommended and for Stoke Golding this would give a housing requirement of 158 2020-2039. It could also help to address any requirement for the Borough to accommodate unmet housing need from the city of Leicester.</p>

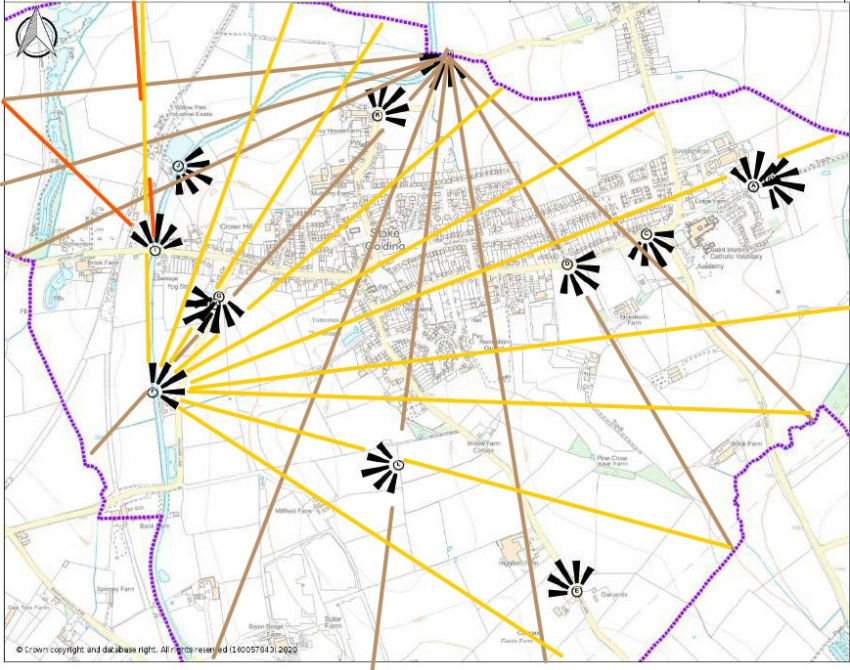
	<p>Borough population 111,370 Stoke Golding population 1,861 Percentage 1.7% Borough Need 8,588 1.7% to Stoke Golding 144 10% uplift 9,447 1.7% to Stoke Golding 158</p> <p>HBBC recommends that the Stoke Golding NP makes 158 dwellings its housing requirement for the period 2020 – 39. This accords with the “Standard Method”, reflects the approach described by the examiner of the Burbage Neighbourhood Plan, and is considered a sensible approach in advance of a figure being provided through the emerging Local Plan.</p> <p>Should an alternative approach to the above be pursued through the Neighbourhood Plan this would need to be based on sound evidence and justified so satisfy the examiner of the Neighbourhood Plan.</p> <p>As noted above the Borough may need to accommodate unmet housing need from the City of Leicester. In December 2020 the Standard Method for establishing housing need for Local Planning Authorities was revised so that the housing need for the 20 largest cities in England, including Leicester, was increased by 35%. This is likely to lead to a significant increase in the level of unmet housing need arising in Leicester. Whilst work is ongoing across Leicester and Leicestershire to agree a method of apportioning this unmet need it is possible that the Borough may be expected to accommodate part of this additional 35% uplift. It is therefore considered important that neighbourhood plans in the borough are flexible enough to respond to a potentially higher housing need figure in the emerging local plan. Without flexibility it is possible that neighbourhood plans may quickly become out of date.</p>
4.12 plan period	HBBC is encouraging neighbourhood plans currently under preparation to plan for the period 2020-39. It is logical and standard practice for housing requirements and planning supply to apply to the plan period; this means that both annual requirements and housing completions for the <i>preceding period</i> should not be included.
4.13	Past completions prior to April 2020 should not count towards housing supply in the period 2020-2039, so the completions at Bosworth Manor and Convent Drive would not count; however, they could contribute toward a windfall allowance – see below.
4.14 and 4.15	Rewording is recommended to reflect there being a housing requirement of 158 dwellings 2020-39. An allowance for windfall development can be made based on past trends. HBBC calculates that from 2006 to 2020 there were 38 windfall dwellings delivered in Stoke Golding giving 2.7 windfall dwellings a year which would equate to 51 dwellings over the plan period. A word of caution is that the figure might need to be reduced if there is cause to believe that opportunities for windfall development will reduce over the plan period.
Policy SG1	<p>A title “Housing Requirement” would better reflect the intention of the policy, than “Provision” which can suggest supply.</p> <p>If a windfall allowance is included, Policy SG1 should set out the overall requirement figure, the windfall allowance and the remainder to be met by allocations.</p>
4.17 Site	See comments on Evidence below.

Selection																
4.19 and Policy SG2 Mulberry Farm	<p>HBBC welcomes the extent to which the allocation has been scaled back to include the recognised improvement area only, as this greatly reduces the potential of negative effects on the historic environment.</p> <p>Is there evidence of the remaining site being deliverable within the plan period? As Mulberry Farm is the only proposed allocation, this is likely to be a question of the Examiner. The NP Group may wish to explore whether the landowner can provide evidence of current developer interest in the site?</p> <p>Criterion 1: the policy needs to be clear on the minimum number of dwellings achievable</p> <p>Criterion 2: unnecessary duplication. Can rely on Policy SG5 without repetition here</p> <p>Criterion 3: the Examiner will want to know if access is possible off High Street. Has the highway authority given an opinion?</p> <p>Criterion 4: Remove the proviso, “unless removal is necessary to provide a safe and suitable access”. This presumes that the locally listed building will need to be demolished to provide access, presenting a fait accompli.</p> <p>Criterion 8: The requirement for a LVIA would be excessive considering that the acceptability of housing development in principle has already been established by the allocation, which implies that the impact of housing development on the wider landscape is acceptable. A Design and Access Statement will be required for the planning application. An assessment of street scenes and heritage would be more appropriate than a LVIA.</p> <p>Criterion 9: Duplicates the Development and Design policy (DM10a+b) of HBBC’s Site Allocations and DM Policies Plan 2016. Are there any other site specific issues of amenity, other than impact of the White Swan PH covered in criterion 10 that will be unique to this site?</p> <p>Criterion 12: Duplicates the Preventing Pollution policy (DM7e) of HBBC’s Site Allocations and DM Policies Plan 2016</p> <p>Criterion 13: Duplicates the Development and Design policy (DM10h) of HBBC’s Site Allocations and DM Policies Plan 2016. Are there any site specific drainage issues that could be identified?</p>															
After Policy SG2	<p>Given a housing requirement of 158, a windfall allowance of 51 and question marks over the deliverability of Mulberry Farm, other allocations will need to be considered. The most obvious opportunities for additional allocations include the proposed reserve site at Stokesfield Farm (South of Hinckley Road) and the recent outline permission for development of up to 65 dwellings on Land East Of Roseway (20/00779/OUT). If the deliverability of Mulberry Farm cannot be demonstrated, there would be a shortfall that would need to be met by a further allocation. Also, increased flexibility would be provided if a new reserve site could be identified to replace Stokesfield Farm.</p> <table data-bbox="389 1742 842 1910"> <tr> <td>Housing requirement</td> <td></td> <td>-158</td> </tr> <tr> <td>Windfall allowance</td> <td>51</td> <td>-107</td> </tr> <tr> <td>East of Roseway</td> <td>65</td> <td>-42</td> </tr> <tr> <td>Stokesfield Farm</td> <td>25</td> <td>-17</td> </tr> <tr> <td>Mulberry Farm</td> <td>25?</td> <td>+8</td> </tr> </table> <p>Although permission has been granted in outline, it would still be worth setting out a Policy for Land East of Roseway similar to Policy SG2, to guide the form of development. Many detailed matters are still to be agreed if the</p>	Housing requirement		-158	Windfall allowance	51	-107	East of Roseway	65	-42	Stokesfield Farm	25	-17	Mulberry Farm	25?	+8
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	<p>outline permission is pursued, and one cannot be sure that there will not be further outline or full planning applications in the future that the NP could influence.</p>
<p>4.21 – 4.22 and Policy SG3 Reserve Site Stokesfield Farm</p>	<p>Following the logic of the above comment, paras 4.21 – 4.23 and Policy SG3 would need to be recast to present land at Stokesfield Farm as an allocation rather than a reserve site.</p> <p>The explanatory chronology of proposing then withdrawing the remainder of Mulberry Farm in paragraph 4.22 is unnecessary baggage. It will have seemed an important step in plan preparation over the last year, but will soon be forgotten. For the record, the reasons for the change have been set out in the Site Selection background evidence.</p> <p>HBBC supports the principle of having a reserve site (as a replacement for Stokesfield Farm) available for release if necessary. The following comments on the wording of Policy SG3 can apply to Stokesfield Farm as an allocation or could be carried forward to a new reserve site:</p> <p>Current wording says the site will be made available if it becomes necessary to provide additional homes in accordance with the new Local Plan. To avoid any dispute about when a reserve site becomes available it would be worth adding wording to clarify at what point in the process of Local Plan preparation the site is released for development.</p> <p>Criterion 1: policy needs to be clear on the <i>minimum</i> number of dwellings achievable</p> <p>Criterion 2: unnecessary duplication. Can rely on Policy SG5 without repetition here</p> <p>Criteria 3 and 7: applicable to the Stokesfield Farm site, the Examiner will want to know if access is possible off Hinckley Road and implications for the bus stop. Has the highway authority given an opinion? Acceptable highway access will also need to be demonstrated on any new reserve site.</p> <p>Criterion 4: This clause should not be used in relation to any allocation or reserve site as a policy cannot be used to preclude further development in the future. Criterion 5: Unless recommended by LCC Archaeology the exact level of Archaeological work should not be specified as a requirement. This should be left to the statutory consultee. The criterion should just state that an archaeological assessment may be required.</p> <p>Criterion 6: The requirement for a LVIA would be excessive considering that the acceptability of housing development in principle has already been established by either allocation or reserving the site, which implies that the impact of housing development on the wider landscape is acceptable. A Design and Access Statement will be required for the planning application. An assessment of street scenes and heritage would be more appropriate than a LVIA.</p> <p>Criteria i, ii and iii under point 6 should be given their own numbers (rather than being a sub-set of 6.) as they concern separate issues.</p> <p>Criterion 8: Duplicates the Development and Design policy (DM10a) of HBBC's Site Allocations and DM Policies Plan 2016. Are there any site specific issues of amenity that will be unique to this site?</p> <p>Criterion 9: This criterion may not be needed if a new reserve site does not sit below power cables. The criterion is laudable for reasons of visual amenity, but is it known whether the replacement of the overhead cabling with underground cabling is necessary to allow the development to go ahead and whether the cost can be realistically covered by the development? It</p>

	<p>may not be a planning matter, rather a matter for the statutory undertaker. Criterion 10: Duplicates the Development and Design policy (DM10h) of HBBC's Site Allocations and DM Policies Plan 2016. Are there any site specific drainage issues that could be identified?</p>
Map 3 Housing	<p>Add "Settlement Boundary" to the title of Map 3.</p> <p>The Settlement Boundary ought to be drawn round the site of the outline planning permission for housing at Land East of Roseway.</p>
Map 4 Housing Allocations	<p>Map 4 at 1:5000 scale reads as a location plan for the proposed allocation and reserve site. If someone were interested in precise boundaries, for example wanting to know if a tree or fence lay inside or outside the site they would struggle at this scale. If individual site maps could be provided at either 1:1000 or 1:500, more detail about each site would be apparent. Map 3 serves adequately to show the locations of the sites within the village.</p>
4.25 and Policy SG4 Infill Housing	<p>The subject matter of Policy SG4 concerns housing development inside and outside of the Settlement Boundary. As such it goes beyond what the title, "Infill Development" suggests. Consider using a new title that better reflects the purposes of the policy.</p> <p>Point 3 should make reference to the NPPF (para 19) as this is where this text originates and is normally the only reason to have to include such exception.</p> <p>Of the exceptions where development outside the Settlement Boundary may be permissible listed in Policy SG4, several merely duplicate Site Allocations and Development Management Policies: 4 (DM5), 5 (DM14) and 6 (DM15). If a cross reference to the relevance of SADM policies is desired, paragraph 4.25 could be added to: "...will not normally be supported with the exception of the instances specified in Policy SG4 and the exceptions allowable under Local Plan policies:</p> <ul style="list-style-type: none"> • Rural worker accommodation (Policy DM5) • Replacement dwellings (Policy DM14) • Re-use and adaption of redundant rural buildings (DM15) and • Exception sites for affordable housing (CS17)"
4.26 – 4.30 and Policy SG5 Housing Needs of Older People and Housing Mix	<p>The information in the Housing and Economic Development Need Assessment 2017 has been superseded by the HBBC Housing Needs Study (https://www.hinckley-bosworth.gov.uk/info/1004/planning_policy_and_the_local_plan/1610/housing_needs_study_2020)</p> <p>Refer to the above for updated information on housing mix and size – update table at 4.27 with new information. The table also needs a title and source Policy SG5 could refer to the housing needs study and subsequent updates.</p>
4.31 – 4.33 Self-Build	<p>The data in paragraph 4.33 could be updated to state that at 30th October 2020 there were 72 people on the register. The following sentence stating that none of these specifically sought a plot in Stoke Golding could be extended to note however that 22 people stated a preference for a rural location.</p> <p>Is it assumed that the NDP will defer to the local plan on self-build policies?</p>
4.34 – 4.36 and Policy	<p>Policy SG6 almost duplicates requirements of Core Strategy policies CS15 (Affordable Housing) and CS17 (Rural Needs). One difference is that Policy</p>

<p>SG6 Affordable Housing</p>	<p>SG6 expects occupation of <i>all</i> affordable housing provided in Stoke Golding to be subject to a local connections priority, whereas this is only a requirement for affordable housing secured for Rural Needs (CS17) in the case of Core Strategy policy. Another difference is that Policy SG6 defines local connection as including "...close family ties..." whereas Policy CS17 defines this as an existing family connection. A further difference is that Policy SG6 describes Rural Exception sites as being possible <i>within</i> the Settlement Boundary. It is generally the case that to be "exceptional" these sites have to be proposed in locations where permission would not normally be granted, which would fit with locations outside the Settlement Boundary of Stoke Golding, but not within.</p> <p>Duplication would be reduced if:</p> <ul style="list-style-type: none"> i) the supporting text made cross reference to Local Plan policy requirements for affordable housing and ii) Policy SG6 were reworded to set out only the aspects of the affordable housing requirement that are different in Stoke Golding.
<p>Policy SG7: Countryside</p>	<p>Could SG7 be reworded to concentrate on the policy provisions that add additional considerations, rather than duplicating HBBC SADM policy?</p>
<p>5.8 – 5.9 and Policy SG8 Areas of Separation</p>	<p>Could the wording of this policy be strengthened? Once the East of Roseway development proceeds, the remaining countryside gap with Dadlington is of critical importance to the separation of the two settlements, such that stronger wording could be justified to resist further encroachment into the gap between settlements. The final sentence "Any development proposal..." implies development can acceptable in principle providing that location, design and landscaping is acceptable.</p>
<p>5.10</p>	<p>Map 6 is not on p.29.</p>
<p>Policy SG10 and Fig 9 Public Rights of Way</p>	<p>As there is a policy requirement, there needs to be a clear full page map with a key showing existing PRW, the long distance footpaths and any proposals for improved links (which should be schematic, if precise routes are not yet known).</p>
<p>5.23 – 5.26, Map 7 and Policy SG11 Locally Important Views</p>	<p>Map 7. Taking the arc of vision suggested by the viewpoint symbols on Map 7, every part of Stoke Golding Parish is covered by one or more Locally Important View (see sightlines added to map below). The ubiquitous generality of the coverage will diminish the value of the key ones. It would be better to seek to preserve the best views rather than apply blanket coverage to all. Also, more explanation is needed to understand what is valuable about each of the views, particularly where this can be linked to any features highlighted in the Borough Landscape Character Assessment.</p> <p>As part of the NP evidence, the Parish website hosts a document "Locally Important Views" (ref VW1) with large photographs of views around Stoke Golding but it is not clear which ones relate to the Locally Important Views listed on Map 7.</p>

	<p>Locally Important Views</p> <p>Stoke Golding CP</p> <p>Map 7</p> <p>Author: [redacted] Date: 19/10/2020</p>  <p>5.26. This paragraph requires a Landscape and Visual Impact Assessment (LVIA) for “large developments” and “proposals that are likely to impact on Locally Important Views”. To avoid uncertainty about when LVIAs are or are not required, further explanation is recommended to give guidance on what counts as “large” development and what degree of impact on views, perhaps with some examples. Use of the term “Major” which is defined in Government regulations could be an alternative to “large” which would otherwise need to be explained.</p> <p>View D looks across land proposed as the reserve housing site (Stokesfield Farm). If the NP accepts that housing development (albeit, reserved for a future date) in the foreground of one of the highly characteristic views defined by Policy SG11 would accord with the provisions of Policy SG11, the same argument could be advanced for all the other highly characteristic views. To avoid this, View D ought to be deleted or moved to beyond the boundary of the proposed site.</p>
<p>5.27 – 5.29, Policy SG12 and Map 6 Ecology and Biodiversity</p>	<p>Policy SG12 and Map 6. As the Local Wildlife Sites (LWSs) listed in the policy have distinctive features of value, it would be helpful for the location of individual sites to be referenced on Map 6. This locational information would make it easier to evaluate the impact of proposed development on the LWSs.</p> <p>BAP Priority Habitats is referenced in the Policy but not explained in the supporting text.</p> <p>“Midlands’ style” hedge laying is referenced in the Policy but not explained in the supporting text.</p>
<p>5.30 – 5.33 and Policy SG13 Trees and Hedgerows</p>	<p>As woodland is very limited in Stoke Golding (para 5.6) innovative policy could be considered that insists that new development provide new trees on the basis of number of trees per new floor space, and where it is not physically possible to provide new trees on-site, the NP could identify appropriate locations in SG parish where new tree planting would be directed</p>

	<p>instead. Such locations would need to be agreed with the landowner and clearly mapped. Supporting evidence can be taken from the Green Infrastructure Strategy.</p>
5.34 – 5.41 and Policy SG14	<p>Regarding the criteria of SG14 for solar farms,</p> <ol style="list-style-type: none"> 1. How does the priority for previously developed / non-agricultural land work in practice? Are there meaningful quantities of such land available in Stoke Golding? Does it mean that small plots of such land that happen to be available must be used in conjunction with a permission for greenfield agricultural land? 3. Important grammatical nuance. As currently worded “sensitively” applies to the <i>process</i> of selecting land. Suggest rewording to require the location to be sensitive to the landscape. <p>Regarding the proposed policy on development of wind turbines, is a total embargo justified? Are some locations inappropriate because of landscape quality, but other locations appropriate for certain sizes or types of turbine?</p>
6.8 – 6.13 Designated Heritage Assets	6.10 reference to Map 9 should be to p46
6.28 – 6.32, Map 9 and Policy SG15	<p>6.29 Page reference to map incorrect. Should be to p46.</p> <p>The wording of Policy SG15 is proportionate and conforms with Policies DM11 and DM12 of the Site Allocations and Development Management Policies DPD and Section 16 of the NPPF. The reference to taking opportunities to enhance or better reveal their significance is welcomed.</p> <p>Inclusion of the important local buildings identified within the Conservation Area Appraisal within policy SG15 is supported. However there are a number of other sites of interest included on the Leicestershire Historic Environment Record (as acknowledged in para 6.32) so is there a reason why just five sites from this source have been specifically included within Policy SG15 (these are entries AA-EE)? If the Group wish to only identify these five sites only perhaps a greater articulation as to why the sites have been included within the policy is required, i.e. why are they of local significance? It is likely that the local significance of the former railway station (AA) and WW2 observation tower (EE) warrant identification within the policy. Are there any physical remains of the ditches and boundaries at Laburnum Cottage (DD) following the recent completion of the re-development of the site – i.e. are there any features left to preserve that would warrant specific inclusion within this policy? Also the extent of the turnpike road (BB) is not very clear on the Policies Map (pages 66 and 67) whilst the position of the flint scatter north of Millfield Farm (CC) does not appear to be on the Policies Map (when compared to its position marked on the HER map).</p> <p>There appears to be some faint and well-defined areas of ridge and furrow surrounding the village, has the Group given any consideration to identifying this remnant of the medieval landscape and whether a policy identifying it as a non-designation heritage asset and seeking its preservation and enhancement is required? There are a number of other emerging NDPs within the HBBC area that have a specific policy for ridge and furrow so there are examples that could be presented to the Group</p> <p>Policy SG15 and Map 9. As the features of local heritage interest listed in the policy have distinctive features of value, it would be helpful for the</p>

	<p>location of individual sites to be referenced on Map 9. This locational information would make it easier to evaluate the impact of proposed development on the features of heritage interest.</p> <p>Map 9. The map could be made more legible if the area boundaries were better differentiated. One option could be to make the Conservation Area boundary dashed or dotted rather than a solid line. The same comment is made regarding the Conservation Area boundary on the Policies Maps below.</p>
<p>Policy SG16 Design</p>	<p>HBBC supports this Policy as it seeks to preserve the historic environment. But with some additional wording it may also present opportunities to enhance the historic environment. In the policy text after the word <i>protect</i> in limbs 2, 6i and 6ii consider adding to this so it reads <i>protect and where possible enhance...</i></p> <p>The place making requirement of criterion 6 may be difficult to achieve for certain types of development. Could add “As appropriate to the scale of development...” to the beginning of the clause?</p>
<p>7.1 – 7.2 and Policy SG17 Local Green Spaces</p>	<p>The 11 candidates closely match most of the open spaces defined and protected by Policy DM8 of HBBC’s Site Allocations and Development Management Plan (SADMP). Differences are:</p> <ul style="list-style-type: none"> i) SGNP site H (Convent Drive) has a larger footprint than SADMP STG12PP including part of STG13 (St Martins Allotments) and some undesignated amenity land to the south ii) SGNP Site I (St Martins Allotments) is narrower than SADMP STG13 having included land in site H instead iii) SGNP Site J (Laburnam Gardens) appears to be a much smaller part of SADMP STG05 (High Street Allotments) iv) SGNP Site K (St Margarets CoE Primary School Playing Fields) is larger than SADMP STG07, incorporating additional open space that forms part of STG 19 (St Margarets School Community Facility) <p>Local Green Space (LGS) designations have a higher protection status consistent with Green Belt policy, so require a higher level of justification than open spaces of a local plan. The NPPF sets out criteria (paragraph 100):</p> <p>‘The Local Green Space designation should only be used where the green space is:</p> <ul style="list-style-type: none"> a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a 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 c) local in character and is not an extensive tract of land’. <p>Paragraph 7.2 explains that the NP consultation is designed to elicit views of landowners before a decision is taken on which sites to propose as LGSs in the submission NP. However, evidence will also need to be provided to illustrate how proposed LGSs meet the NPPF criteria for designation.</p>
<p>8.1 – 8.2 and Policy SG18 Community Services and Facilities</p>	<p>Duplication of SADM Policy DM25? Policy DM25 (community facilities) and DM8 (open space, sport and recreational facilities) provide qualified protection to most of the facilities listed. Policy DM22 provides qualified protection for the village convenience store. The pubs and Stoke Golding Club are not identified for protection in the SADM Plan, but Policy DM25 still</p>

	<p>would provide some qualified protection for such facilities.</p> <table border="1"> <thead> <tr> <th><u>Stoke Golding Plan Facility</u></th> <th><u>SADM Plan Ref</u></th> </tr> </thead> <tbody> <tr> <td>A. St Margarets CE Primary School</td> <td>STG19</td> </tr> <tr> <td>B. Stoke Golding Surgery</td> <td>STG22</td> </tr> <tr> <td>C. Stoke Golding Recreation Ground</td> <td>STG10 (DM8)</td> </tr> <tr> <td>D. Village (Sehmbi) convenience store</td> <td>STG15N (DM22)</td> </tr> <tr> <td>E. Village Pubs</td> <td></td> </tr> <tr> <td> a. The George & Dragon</td> <td></td> </tr> <tr> <td> b. The Three Horseshoes</td> <td></td> </tr> <tr> <td> c. The White Swan</td> <td></td> </tr> <tr> <td> d. Stoke Golding Club</td> <td></td> </tr> <tr> <td>F. Community Halls</td> <td></td> </tr> <tr> <td> a. The Baxter Hall</td> <td>STG18</td> </tr> <tr> <td> b. Methodist Hall</td> <td>STG20</td> </tr> <tr> <td> c. Village Hall</td> <td>STG21</td> </tr> <tr> <td> d. Stoke Golding Club</td> <td></td> </tr> <tr> <td>G. Places of Worship</td> <td></td> </tr> <tr> <td> a. St Margarets Church</td> <td>STG17</td> </tr> <tr> <td> b. Methodist Church</td> <td>STG20</td> </tr> <tr> <td> c. Zion Chapel</td> <td>STG16</td> </tr> <tr> <td>H. Allotments</td> <td>STG03, 05, 13 (DM8)</td> </tr> </tbody> </table> <p>Policy SG18 needs to be reworded to either:</p> <ol style="list-style-type: none"> i) Add that retention of facilities should also be in accordance with Policies DM8 and DM22 (to cover the allotments, recreation ground and convenience store), or ii) Take the allotments and recreation ground out of Policy SG18 and ensure they are covered by the submission version of Policy SG17 (Local Green Spaces). Take the convenience store out of Policy SG18 and ensure it is covered by Policy SG19 (Village Centre) 	<u>Stoke Golding Plan Facility</u>	<u>SADM Plan Ref</u>	A. St Margarets CE Primary School	STG19	B. Stoke Golding Surgery	STG22	C. Stoke Golding Recreation Ground	STG10 (DM8)	D. Village (Sehmbi) convenience store	STG15N (DM22)	E. Village Pubs		a. The George & Dragon		b. The Three Horseshoes		c. The White Swan		d. Stoke Golding Club		F. Community Halls		a. The Baxter Hall	STG18	b. Methodist Hall	STG20	c. Village Hall	STG21	d. Stoke Golding Club		G. Places of Worship		a. St Margarets Church	STG17	b. Methodist Church	STG20	c. Zion Chapel	STG16	H. Allotments	STG03, 05, 13 (DM8)
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<p>8.3 – 8.10 Education and Stoke Golding Surgery</p>	<p>Paragraph 8.5 says St Margaret’s School is oversubscribed. Give consideration to whether this will remain the case for the duration of the neighbourhood plan, as the demographic need for child places can change significantly over a small number of years. Adding a time reference to the statement would be helpful, for example, “At 2020 the school was oversubscribed.”</p> <p>Paragraph 8.5 raises concern about school overcrowding and 8.10 relays concerns expressed in the household survey that the GP surgery is at capacity and that further housing development will lead to a poorer service. Cross references to Policy SG20 “Infrastructure” would help direct readers to the requirement for major new development to contribute to infrastructure improvements including St Margarets School and Stoke Golding Surgery.</p>																																								
<p>8.11 and Policy SG19</p>	<p>Regarding Paragraph 1 of Policy SG19. SADM Plan policy DM22 and map on p.89 defines the Stoke Golding Neighbourhood Centre with physical boundaries, as do the Policies Maps (pp 66 and 67) of the Stoke Golding Neighbourhood Plan, albeit labelled as Village Centre. However, Map 11 of Stoke Golding Neighbourhood Plan only shows the location of a number of facilities, and does not show the Neighbourhood Centre; most of the facilities are not located within the defined Neighbourhood Centre. As such, first paragraph of Policy SG19 is confused. It says the Village Centre will be maintained and, where possible, enhanced for small scale shops / services for the use of the local community. Questions are:</p>																																								

- i. If “Village Centre” means the same defined area as Neighbourhood Centre, either the reference to Map 11 needs to be removed from the policy, or the Village Centre added to Map 11. Without this clarification, it is easy to think that the policy applies to the facilities identified on Map 11 which are spread over a larger area. It would be helpful if the supporting text could clarify that the Village Centre is the same as the defined Neighbourhood Centre in the SADM Plan, but with a different name.
- ii. What is exactly meant by the verbs “maintain” and “enhance”? Do they refer to the physical size of the area designated as the Village Centre? Does “enhance” mean physically extend, or improvement of quality? Or do the verbs refer to town centre uses, such that the loss of existing uses be resisted and new floor space encouraged that would enhance the centre? Policy on uses is set out in Paragraph 2, so would be unnecessary duplication in Paragraph 1. Greater clarification is needed, and if the Neighbourhood Plan anticipates any future expansion of the defined centre, could the location(s) for this be shown on the map?

Regarding paragraph 2 of Policy SG19, this supports a list of uses where they will enable the Village Centre to continue to meet the needs of the community. It is presumed this means proposals for new floor space of the named uses would be supported (in the Village Centre or anywhere in Stoke Golding?), providing that the existing facilities within the Village Centre would not be undermined in their ability to serve the needs of the local community. The question of *where* would such proposals be supported ought to be made clear. The defined Village/Neighbourhood Centre is quite small and ability to accommodate new floor space limited, so without qualification in the policy, readers may assume it means anywhere in Stoke Golding.

The range of supported uses is extensive, and the locational consequences vary considerably. For example, the F1 uses are typically found out-of-centre within the residential areas that they serve. Conversely, pubs and takeaways typically gravitate to centres, and can cause residential amenity problems. Small scale convenience retail proposals might be welcome as a means of improving the local choice to meet local day to day needs, but at what scale would a proposal prejudice the existing convenience store? How will that judgement be made? If Policy SG19 is to offer qualified support to proposed uses beyond the Village Centre, thought will need to be given to whether different uses warrant a different policy approach, and consistency with the sequential approach of national planning policy and SADM Plan’s policies DM21 and DM22.

Regarding the third paragraph of Policy SG19, the first part “Proposals that could prejudice the Village Centre’s ability to meet local day to day needs...will not be supported” is essentially the reverse wording of paragraph 2. It should be possible to word Paragraph 2 so that this part of paragraph 3 would be unnecessary.

The other element of paragraph 3 says that proposals that could lead to an over-concentration in any one use in the Village Centre, will not be supported. The defined centre is so small that it will be difficult to have more than 3 or 4 of the same uses, but thought needs to be given to how over-

	<p>concentration would be defined, and would it be different depending on the use, for example 3 separate shops might be considered favourably, whilst 3 hot food takeaways unfavourably?</p> <p>Map 11 does not show a boundary for the Village Centre. In any case, the scale of Map 11 (1:10000) will not enable sufficient clarity of boundary to see which properties lie inside. A larger scale map of the Village Centre should be provided.</p> <p>Many questions have been raised about how Policy SG19 applies. Hopefully these will help the NP Group to focus and refine the policy into achieving what they think is most important, for example protecting the uses of the village/neighbourhood centre to provide a service to residents.</p>
8.34 – 8.35 Superfast broadband	<p>To help deliver improved broadband, the NP should consider making provision of optical fibre cable connections to new housing a requirement of the policies governing development of allocated and reserve sites and of other housing and employment development. Appropriate cross references to these policies should then be made in paragraphs 8.34-35.</p>
8.36 – 8.38 and Policy SG20 Infrastructure	<p>8.36. Regarding the second sentence, a more accurate wording of the need for developer contributions would be, “Sometimes these impacts can be detrimental and so developers will be required to mitigate the impact of their development by contributing to local infrastructure.”</p> <p>Policy SG20 - wording “Major new development will be supported by the provision of...”. This is ambiguous about who will provide the infrastructure. It should be made clear that it is an expectation for the developer to make provision where new development generates increased need for infrastructure use. The level of provision will depend upon viability of the development and it is unlikely that all improvements on the list could be funded. Could the policy or supporting text give a steer on how different improvements would be prioritised or chosen?</p> <p>Also, the policy applies to <i>major</i> new development which is defined nationally as inter alia housing developments of 10 or more dwellings. Where there is an evident need, HBBC policy seeks contributions toward green space improvements on schemes of less than 10 dwellings. To make sure the policy does not prevent HBBC from seeking contributions from developments of less than 10 dwellings, the following wording could be used: “Developments of new dwellings and other major development...”</p> <p>Is there evidence that the landowners, operators and regulating authorities of existing facilities such as the schools, GP Surgery and recreation ground are supportive of the extensions and improvements envisaged?</p> <p>With regard to the community infrastructure improvements (including the provision of parish notice boards, seats, children’s play area equipment, bus shelters, litter bins), are these just generic ideas, or is there an inventory of specific proposals for which there is a demonstrable need for in particular locations?</p> <p>Are there any particular road related improvements envisaged as necessary in the village to control speed or volume of traffic generated by major housing developments?</p> <p>The reference to the Community Infrastructure Regulations 2010 may be</p>

	<p>dated. There have been many changes to national policy and regulations concerning S106 and the Community Infrastructure Levy, and the Planning White Paper 2020 proposes an entirely new regime. It might be safer to simply say “Contributions are governed by national regulations”</p>
<p>9.1 – 9.12 Traffic & Transport</p>	<p>This section is largely descriptive of the way things are in Stoke Golding concerning roads, parking, public transport and cycling. Whilst it is true that many traffic matters do fall outside the scope of planning (as stated in para 9.1), there is also a place for neighbourhood plans to set out other aspirations for improvements, for example on-street parking controls, pedestrian crossings, traffic calming and improved bus services. Stating these in the NP can be instrumental in seeking infrastructure funding from public authorities. See advice on “Community Proposals” below.</p> <p>A policy addition could be a requirement to install an electric vehicle charging point for each parking space provided in new development? Government policy means that the number of electric cars will multiply during this decade and it is much cheaper for charging points to be included as part of development rather than being retro-fitted later.</p>
<p>10.1 – 10.11 SG21 Tourism</p>	<p>There is a degree of duplication with HBBC Local Plan policies; Policy 23 (Tourism Development) of the Core Strategy and DM24 (Cultural and Tourism Facilities) of the SADMDPD which include criteria to assess proposals for tourism development.</p> <p>In practical terms how will proposals for tourism facilities that have no demonstrable association with the battlefield and canal be considered?</p>
<p>10.12 – 10.13 and SG22 Willow Park Industrial Estate</p>	<p>Para 10.12: correct the page reference to Map 12. Para 10.13: the Employment Land and Premises Study was updated to 2020 so the reference to 2013 needs to change to 2020.</p> <p>Policy SG22. Whilst the proposed protection of this key rural employment site of Willow Park in Policy SG22 is supported by HBBC in principal, the NP Group need to consider carefully the uses that it wants to protect. Policy SG22 refers to B2 (industry) and B8 (warehouse/distribution) uses but does not include offices, research and light industry (formerly the uses of the now redundant B1 class), now part of the broad E class which includes retail and other commercial uses. It is quite likely that Willow Park contains some existing office and light industrial uses, which would now have the right to change to retail or other E class uses without the need for planning permission. Nothing can be done about that, but if applications were made for new business development, including proposals for offices or light industry in the E class, Policy SG22 could be revised to offer support for these perhaps on the proviso that planning conditions are applied that would require planning permission to change to other E class uses that are not considered appropriate in that location.</p>
<p>10.14- 10.15 and SG23 Business Conversion of Rural Buildings</p>	<p>Policy SG23. Criterion 1: Could any rules of thumb be provided on what is meant by “proportionate” in terms of building enlargement? Eg % increase on volume? Criterion 5: what is meant by “harmful to local rural roads”? Does this mean congestion & safety? What about harm to local communities in terms of noise and vibration?</p>
	<p>Is there a policy gap for dealing with proposals for employment uses in the settlement that are not tourism related, for example infills or building conversions? Perhaps policy could be generally supportive (reflecting the Household Survey findings) subject to standard protections against loss of</p>

	residential amenity, impact on heritage, open space etc?
Policies Maps	Generally clear and good key. The Settlement Boundary and Conservation Area boundaries are a similar colour, so it is difficult to distinguish them where they intersect. Maybe the Conservation Area boundary line could be dashed or dotted rather than continuous? As mentioned above, it will be helpful if the Local Wildlife Sites and Features of Heritage Interest could be referenced on Maps 6 and 9.

General comments

Duplication of Policy Requirements

In the recent Burbage Examiner's Report it was recommended that where the NP makes reference to adopted Borough Council Local Plan policies, these should be removed as they repeat policy. This recommendation was agreed and taken forward. The NP is an opportunity to refine and add more detail to general policy requirements, particularly where local circumstances give reason to apply a general policy requirement differently. Sometimes, it will be appropriate to list relevant local circumstances or features that ought to be taken into account when applying a Local Plan policy. Such matters may be better set out in the supporting text with appropriate cross references to relevant policy.

Evidence base

The need for evidence is outlined in Planning Practice Guidance and this sets out that proportionate, robust evidence should support the choices made and the approach taken. Planning policies need to be based on clear planning rationale and proper understanding of the place they relate to, if they are to be relevant, realistic and to address local issues effectively. The data and analysis about a place is called the evidence base. This can include social, economic and environmental data.

The following comments relate to particular pieces of evidence:

Site Selection

Evidence of how the sites were appraised is set out in background evidence paper "Site Selection and Evaluation Process" (ref: HO3) and a series of documents (EV1-4) setting out the chronology and methodology for site selection. Criteria for assessing the sites derived from feedback at drop-in sessions (EV1), from the approach used at Brigstock (EV2) and from assistance of the Rural Communities Council (RCC). Eight overall criteria were established:

- 1) Any new development should be of small to medium scale, limited to 25 dwellings on an individual site.
- 2) The village character should be preserved and heritage assets protected.
- 3) Valued landscapes and the overall landscape setting of the village should be protected.
- 4) Green and open spaces should be enhanced and protected.
- 5) Access to the countryside should be protected and enhanced.
- 6) Wildlife habitats and biodiversity should be protected and enhanced.
- 7) There should be good pedestrian connectivity to key local services and amenities.

8) The impact of traffic should be minimised and sustainable transport choices enhanced.

These were fleshed out into 39 detailed criteria against which the sites were RAG rated (EV4). Twelve key criteria (1a – 1e and averages of criteria 2 – 8) generated the final scores. The results of the evaluation are set out in a table (EV7) with the top scoring sites being White Swan, Mulberry Farm and AS540 (Land south of Hinckley Road, adjacent to Pine Close).

A comprehensive set of maps are provided. The location of the sites can be seen on SHELAA Map Oct 2018 (ref HO4) and Map of Sites for Housing Allocation Assessment (ref HO5). Individual site maps and proformas of key site characteristics are provided for all the sites set out in HBBC's SHELAA, but not for the 3 additional sites considered by the Neighbourhood Group, including the two sites of Mulberry Farm and White Swan that scored best in the assessment.

Further consultation with HBBC resulted in the White Swan site being considered inappropriate for housing development for conservation reasons and the open land comprising of the northern part of the Mulberry Farm site being withdrawn because of impact on the designated Bosworth Battlefield.

HBBC comments are as follows: The RAG assessment has merit as a locally determined assessment of local preferences. But there will be questions over the subjective nature of the scoring and the detailed reasoning is not readily apparent. For example, how was it concluded that the Mulberry Farm site, including both the land with farm buildings the open land, should be scored Amber rather than Red in terms of impact on the designated Bosworth Battlefield? There is reference to the process of scoring being carried out at public meetings that were minuted, but the examiner will want to understand the scoring without having to trawl through minutes of several meetings. It would be better if the reasoning behind site scoring could be assembled in one place.

Local Green Space Designation

There is no evidence of an assessment of the spaces identified as Local Green Space. LGS designations need to be justified against the criteria set out in paragraph 100 of the NPPF:

'The Local Green Space designation should only be used where the green space is:

- a) in reasonably close proximity to the community it serves;
- b) demonstrably special to a local community and holds a 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
- c) local in character and is not an extensive tract of land'.

From the information provided it is not clear how the LGSs have been identified, scored and selected or how the LGSs relate to these three NPPF criteria and as a result the justification for these designations is questioned. The protection afforded to sites designated as Local Green Spaces is significant, consistent with Green Belt policy and therefore it is important to justify their designation. It appears from the information provided that the LGS designations do not yet have clear robust evidence to support their selection and designation.

Renewable Energy

There is a blanket restriction of wind turbines in policy SG14. Can this be supported by evidence as to why the Stoke Golding Designated Area is not an appropriate location for wind installations?

Mapping

Comments are made about maps in the detailed policy comments above, including the need for clearer, more detailed maps of the housing allocations / reserve sites and of public rights of way and the need for Local Wildlife Sites and Local Heritage Assets to be referenced on maps.

Consider what base map and scale are appropriate for the purpose of the map, so that the geographic information displayed can be easily interpreted by the users of the document.

Where maps are busy, for example the Policies maps, it may be beneficial to use A3 pages.

Document Accessibility

As per the new Accessibility Act, all documents published on publically accessible websites must comply with the Website Accessibility Directive (2018).

The Borough Council now has to comply with this directive, and this means that all council websites (and documents on that website available for download) must be accessible to customers who may have a disability. These disabilities include: hearing impairment/deaf, visual impairment/blind, mobility issues, dexterity issue (for example difficulty using their hands) and cognitive disability (for example dyslexia or autism). This means that all PDF, Word and Excel documents published on our website after Sep 2018 must comply. Overall all the documents on our website must comply by the end of 2020. We now need to make sure any new documents meet the criteria, and it is the responsibility of the author to create an accessible document.

If you have Microsoft Word 2016 or newer an easy way to check accessibility in a word document is as follows: Click on File in the top left corner, go to Info, and click on Check for Issues under the Inspect Document function. You can then click on Check Accessibility. This will scan the document for any areas that may be difficult for people to read if they are using specific software to read the document out loud etc.

Unfortunately we do not have the resources to amend documents for you, so please ensure that all neighbourhood plan documents, including the plan itself, comply with the accessibility standards before submitting the plan to the LPA at Regulation 15 ready for the Regulation 16 Consultation. If we find that there are extensive parts of the plan that have not been checked for their accessibility, the plan will be returned to the group.

Prior to formal submission (Reg 15) it would be advisable for the group to send the document to the Local Planning Authority to do an initial check that the document is accessible. The LPA can then raise any further areas for amendment with the group before it is formally submitted.

Community Proposals

In the preparation of neighbourhood plans a number of Neighbourhood Plan Groups have highlighted non-planning issues or the need for community projects. There are a number of ways these can be included within a Neighbourhood Plan, Sheepy NDP included them as an Appendix whereas Burbage NDP included them as Community Action Points within the relevant document section. The Group may wish to see if there are any actions arising from the plan preparation which you wish to have more prominence similar to Burbage and Sheepy. For example local aspirations for improved bus services, traffic management and parking could be included.