

Further to your email of 11 December, please find below the comments of the Sheepy Parish Neighbourhood Plan Steering Group and Parish Council about the points you have raised. The opportunity has also been taken to make observations on the response of Hinckley and Bosworth Borough Council on those same matters.

1. On the matter of the Settlement Boundaries you comment that the current Settlement Boundaries are defined by the Site Allocations and Development Management Policies DPD - a non-strategic development plan document. This may indeed be the case (although the Basic Conditions test refers to strategic policies not documents) but the practical effect of the redefining of boundaries - for Sheepy Magna at least - is to move land from the benefit of countryside policies to the benefit of settlement policies and such a change needs, proportionately, to be justified. The evidence document that you quote, whilst helpful as far as it goes, stops short of setting down the outcome of the application of the listed criteria from the "starting point" of the DPD document. I note that the boundary changes appear to be concentrated at the north end of Sheepy Magna; in Sibson the change appears to amount to the inclusion of a previously excluded section of road. The application of local knowledge is where neighbourhood planning can excel, but I am looking to understand the bases on which the boundary line has been realigned.

With regard to the Sheepy Magna Settlement Boundary, the principal differences between the DPD and the Draft Neighbourhood Plan are as follows:

1. Land North of Dormer House Twycross Road: NP includes site of three dwellings (17/00340/FUL);
2. Rodney Gardens, off Twycross Road: Trout Ponds Farm site- 24 homes (14/00136/FUL)

The variation at Sibson is of little consequence and can revert to the DPD Settlement Boundary alignment if that is preferred.

2. On the matter of the Local Green Space designation of the Mill Lake at Sheepy Parva, I can see that an extensive assessment sits behind each of the designations. However, this appears to start from a pre-defined boundary for each area/space. There is therefore no explanation in the Mill Lake case as to why the boundary has been drawn tightly around the water area rather than include all/some of the (green) setting for the lake; it would be helpful to me to know this.

The inclusion of green areas around the lake could serve to prevent recreation and tourism development which might otherwise be acceptable under Policy S1.

3. In response to my query re the site of the Hornsey Rise Memorial home both you and the local authority have made cases for retaining this site allocation even though events have overtaken its original purpose. The question that arises from this is: does this allocation + the current housing commitments meet "the identified housing requirement" for the Plan period. The Plan does not quantify the housing requirement for the Parish but instead relies on the figure for Sheepy Magna passed down from the Core Strategy. As I noted previously, the Core Strategy runs to 2026 whereas the Neighbourhood Plan runs to 2036. The Planning Practice Guidance says: "Neighbourhood plans are not obliged to contain policies addressing all types of development. However, where they do contain policies relevant to housing supply, these policies should take account of latest and up-to-date evidence of housing need. In particular, where a qualifying body is attempting to identify and meet

housing need, a local planning authority should share relevant evidence on housing need gathered to support its own plan-making". And further, "A neighbourhood plan can allocate additional sites to those in a Local Plan where this is supported by evidence to demonstrate need above that identified in the Local Plan" (Paragraph: 044 Reference ID: 41-044-20160519). Further, your response quotes para 14b of the 2018 NPPF to satisfy which the "policies and allocations" in the plan should meet the identified housing requirement in full - a policy on a windfall allowance alone would not be sufficient (PPG Paragraph: 097 Reference ID: 41-097-20180913).

The plan period was the subject of an early discussion with Hinckley and Bosworth Borough Council (see attached). The Borough Council's preference was for a plan period to 2036 with the option of including a 'reserve' housing site. The Neighbourhood Plan Steering Group initially considered the identification of the Hornsey Rise Memorial Home site as a housing reserve site. However, this was not a practical way forward for the following reasons:

1. The NPPF encourages the effective use of land by reusing land that has been previously developed (brownfield land). It is clear that where brownfield sites are available and deliverable, it is not sustainable to hold back its development, especially when green field sites are having to be built upon to meet housing need elsewhere;
2. The site has become victim to arson, vandalism and other anti-social behaviour and is a local eyesore. The local community are keen to see the site redeveloped as soon as possible; and
3. Discussions indicated that a planning application was soon to be made.

Events have not necessarily overtaken the purpose of the Neighbourhood Plan allocation as set out in our earlier representation and that of Hinckley and Bosworth Borough Council. Notwithstanding planning practice guidance paragraphs 040 Reference ID: 41-040-20160211 and 044 Reference ID: 41-044-20160519, the NPPF makes it clear that planning policies should encourage the effective use of land by re-using land that has been previously developed such as the Hornsey Rise Memorial Home. The NPPF taken as a whole, constitutes the Government's view of what sustainable development in England means in practice for the planning system.

On the matter of housing provision, although there is no specific provision for Sheepy Parish as a whole, the Core Strategy identifies Sheepy Magna as a 'Rural Village' where at least 20 new homes are to be allocated over the period 2006 to 2026. For the reasons explained by the Borough Council, it is unable to provide a housing figure for the Neighbourhood Area for the period 2016-2036.

As set out in Draft NP paragraphs 1.11-1.12, the new Hinckley and Bosworth Local Plan will set out the overall development strategy for Hinckley and Bosworth Borough for the period up to 2036 and will include strategic policies and allocate sites to meet identified development needs such as for homes. When the policies in the Local Plan are updated, this may mean that some of the existing neighbourhood plan policies may require review. This does not necessarily mean that the whole neighbourhood plan becomes out-of-date, rather those policies which are impacted by the new Local Plan.

Regarding paragraph 14b of the 2018 NPPF, it is our view that the minimum housing requirement has not just been met but it has been exceeded significantly. It follows that

provided the NP's housing allocation is retained and the other criteria a, c and d are met, the adverse impact of allowing development that conflicts with the neighbourhood plan is likely to significantly and demonstrably outweigh the benefits. We understand that this is a matter for the decision maker on future planning applications and not this examination.

Finally, on matters relating to strategic Local Plan policies this is of limited consequence as the Neighbourhood Plans is in general conformity with both the Hinckley and Bosworth Core Strategy 2006-2026 (Adopted December 2009) and the Site Allocations and Development Management Policies Development Plan Document (DPD) 2006-2026 (Adopted July 2016). The Borough Council refers to the 2018 NPPF on matters relating to the identification of strategic policies and we request you consider NPPF paragraph 28 which states: 'Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include allocating sites, the provision of infrastructure and community facilities at a local level, establishing design principles, conserving and enhancing the natural and historic environment and setting out other development management policies.' (our emphasis).

Colin Wilkinson

From: Samuel Hatfield <Samuel.Hatfield@hinckley-bosworth.gov.uk>
Sent: 07 April 2017 16:15
To: Colin Wilkinson
Subject: RE: Sheepy Parish Neighbourhood Plan

Hi Colin,

Not necessarily, although there may be additional requirements for certain settlements which arise as part of the new Local Plan. I often suggest to groups that it is worth putting a 'reserve site' in NDPs to cater for this eventuality and to retain an element of control over this possible growth.

Thanks

Sam

From: Colin Wilkinson [mailto:colin@pranix.co.uk]
Sent: 07 April 2017 16:13
To: Samuel Hatfield
Subject: RE: Sheepy Parish Neighbourhood Plan

OK, but does this imply additional housing provision?

From: Samuel Hatfield [mailto:Samuel.Hatfield@hinckley-bosworth.gov.uk]
Sent: 07 April 2017 16:10
To: Colin Wilkinson <[redacted]>
Subject: RE: Sheepy Parish Neighbourhood Plan

Hi Colin,

We have recommended to parishes that they make their plan periods to 2036 because this then aligns with the period for the emerging new Local Plan, and means that NDPs will be able to function more in tandem with this.

Thanks

Sam

From: Colin Wilkinson [mailto:colin@pranix.co.uk]
Sent: 05 April 2017 23:22
To: Samuel Hatfield
Subject: RE: Sheepy Parish Neighbourhood Plan

Hi Sam,

I have a small but significant query that perhaps you can help with.

I had been putting the Neighbourhood Plan together with a plan period that matched the Local Plan i.e. to 2026. However, I note that Newbold Verdon are planning for the period to 2036. Can you clarify what plan period you think we should be working to?

Regards