

Newbold Verdon Neighbourhood Plan

Regulation 16 Consultation



March 2020

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1 INTRODUCTION

1.1 Context

- 1.1.1 Gladman Developments Ltd (hereafter referred to as “Gladman”) specialise in the promotion of strategic land for residential development and associated community infrastructure. From this experience, we understand the need for the planning system to deliver the homes, jobs and thriving local places that the country needs.
- 1.1.2 These representations provide Gladman’s response to the current consultation on the Newbold Verdon Neighbourhood Plan (NVNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012.
- 1.1.3 Through these representations, Gladman provides an analysis of the NVNP and the policy decisions promoted within the draft Plan. Comments made by Gladman through these representations are provided in consideration of the NVNP’s suite of policies and its ability to fulfil the Neighbourhood Plan Basic Conditions as established by paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended) and supported by the Neighbourhood Plan chapter of the PPG¹.
- 1.1.4 In accordance with the Neighbourhood Plan Basic Conditions, Neighbourhood Plan policies should align with the requirements of the National Planning Policy Framework (the Framework) and the wider strategic policies for the area set out in the Council’s adopted Development Plan. Neighbourhood Plans should provide a policy framework that complements and supports the requirements set out in these higher-order documents, setting out further, locally specific requirements that will be applied to development proposals coming forward.
- 1.1.5 The NVNP should only be progressed if it meets the Neighbourhood Plan Basic Conditions, supported by a robust and proportionate evidence base.
- 1.1.6 The Framework is clear that Neighbourhood Plans cannot introduce policies and proposals that would prevent sustainable development opportunities from going ahead. They are required to plan positively for new development, enabling sufficient growth to take place to meet the development needs for the area and assist local authorities in delivering housing need. Policies that are not clearly worded or intended to place an unjustified constraint on further sustainable development from taking place are not consistent with the requirements of the Framework or the Neighbourhood Plan Basic Conditions.
- 1.1.7 The NVNP should not seek to include policies that have no planning basis or are inconsistent with national and local policy obligations. Proposals should be appropriately justified by the findings of a supporting evidence base and must be sufficiently clear to be capable of being interpreted by applicants and decision makers. Policies and proposals contained in the NVNP should be designed

¹ Section ID: 41

to add value to existing policies and national guidance, as opposed to replicating their requirements.

- 1.1.8 Gladman are promoting land in the neighbourhood area for residential development at land off Kirkby Lane. A location plan is available at Appendix A of this submission.

2 LEGAL REQUIREMENTS, NATIONAL POLICY & GUIDANCE

2.1 Legal Requirements

2.1.1 Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The Basic Conditions that the NVNP must meet 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 neighbourhood plan;
- b) Having special regard to the desirability of preserving any listed building or its setting or any features of special architectural or historic interest that it possesses, it is appropriate to make the order;
- c) Having regard to the desirability of preserving or enhancing the character or appearance of any conservation area, it is appropriate to make the order;
- d) The making of the neighbourhood plan contributes to the achievement of sustainable development;
- e) The making of the neighbourhood plan is in general conformity with the strategic policies contained within the development plan for the area of the authority;
- f) The making of the neighbourhood plan does not breach, and is otherwise compatible with, EU obligations; and
- g) The making of the neighbourhood plan does not breach the requirements of Chapter 8 of Part 6 of the Conservation of Habitats and Species Regulations 2017.

2.2 National Planning Policy Framework, & Planning Practice Guidance

National Planning Policy Framework

2.2.1 The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements of the preparation of Neighbourhood Plans within which locally prepared plans for housing and other development can be produced.

2.2.2 In July 2018, the Minister of Housing, Communities & Local Government (MHCLG) introduced the first changes to the Framework (the Revised Framework) which has since brought about fundamental changes to the planning system. The Revised Framework was then updated in February 2019 to include some minor clarifications.

2.2.3 In relation to the preparation of Neighbourhood Plans, paragraph 13 of the Revised Framework states:

"The application of the presumption [in favour of sustainable development] has implications for the way communities engage in neighbourhood planning. Neighbourhood plans should support

the delivery of strategic policies contained in local plans or spatial development strategies; and should shape and direct development that is outside of these strategic policies.”

- 2.2.4 Further guidance on how the Presumption interacts with Neighbourhood Plans is provided in paragraph 14 of the Revised Framework.
- 2.2.5 The Revised Framework sets out how neighbourhood planning gives communities the power to develop a shared vision for their area in order to shape, direct and help deliver sustainable development. However, neighbourhood plans should not promote less development than set out in the strategic policies for the area, or undermine those strategic policies contained in higher order documents.

Planning Practice Guidance

- 2.2.1 It is clear from the requirements in the Framework that neighbourhood plan policies should be prepared in general conformity with the strategic requirements for the wider area, as confirmed in an adopted Development Plan. The requirements set out in the Framework are also supplemented by the Government’s suite of Planning Practice Guidance (PPG). In relation to the preparation of the NVNP, the PPG on Neighbourhood Planning is of particular relevance.
- 2.2.2 Paragraph 009 of the PPG states:

“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:

- **the emerging neighbourhood plan**
- **the emerging Local Plan**
- **the adopted development plan**

with appropriate regard to national policy and guidance.

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 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.”²

2.2.3 This guidance is intended to ensure that emerging evidence of housing need is addressed, to in turn help minimise any potential conflicts which can arise and ensure that policies are not overridden by a new Local Plan.

2.2.4 The PPG also emphasises that;

“...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”

2.2.5 With further emphasis that;

“.... 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.”³

2.2.6 Accordingly, the NVNP will need to ensure that it takes into account the latest guidance issued by the SoS so that it can be found to meet basic conditions (a) and (d).

2.3 Strategic Environmental Assessment

2.3.1 In accordance with PPG ID: 11-027, the preparation of Neighbourhood Plans may fall under the scope of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations) that require a Strategic Environmental Assessment (SEA) to be undertaken where a Plan’s proposals would be likely to have significant environmental effects.

² PPG Reference ID: 41-009-20160211

³ Paragraph: 044 Reference ID: 41-044-20160519 (Revised 19/05/2016).

- 2.3.2 The SEA is a systematic process that should be undertaken at each stage of a Plan's preparation. It should assess the effects of a Neighborhood Plan's proposals and whether they would be likely to have significant environmental effects and whether the Plan is capable of achieving the delivery of sustainable development when judged against all reasonable alternatives.
- 2.3.3 The decision making and scoring of the SEA should be robust, justified and transparent and should be undertaken through a comparative and equal assessment of each reasonable alternative. Too often SEA flags up the negative aspects of development whilst not fully considering the positive aspects which can be brought about through new opportunities for housing development and how these can influence landscape issues, social concerns and the economy.
- 2.3.4 It is noted that the current consultation is accompanied by a SEA, dated September 2019. The NVNP Pre-Submission consultation was held May – July 2018 and was not accompanied by a SEA. Following advice from Historic England, Hinckley & Bosworth Borough Council requested a SEA which was eventually the subject of a standalone three-week consultation in December 2019.
- 2.3.5 Gladman are of the view that, in accordance with PPG ID: 11-033, the SEA should have been published for consultation alongside the Pre-Submission NVNP through a second Regulation 14 consultation. This is a position that appears to be shared by Hinckley and Bosworth Borough Council.⁴
- 2.3.6 Given the nature of the NVNP's proposals, Gladman suggest that there may be a requirement to undertake a comprehensive Regulation 14 consultation incorporating both the Pre-Submission NVNP and the SEA. A failure to do so could mean that the NVNP is not legally compliant and risk the neighbourhood plan failing to meet basic condition (f) when examined.

⁴ Newbold Verdon Neighbourhood Plan: Consultation Document: Reference 19: SEA Consultation Process and Outcomes. See Appendix A & D.

3 DEVELOPMENT PLAN

3.1 Adopted Development Plan

- 3.1.1 To meet the requirements of the Framework and the Neighbourhood Plan Basic Conditions, neighbourhood plans should be prepared to conform to the strategic policy requirements set out in the adopted Development Plan.
- 3.1.2 The adopted Development Plan relevant to the preparation of the NVNP is the Hinckley and Bosworth Local Plan, which consist of the Core Strategy DPD and the Site Allocations & Development Management Policies DPD. The Core Strategy determined that Hinckley & Bosworth would be required to deliver 9,000 homes between 2006 and 2026. The important role Newbold Verdon plays as a key rural centre that provides the necessary day-to-day services for those people living in the settlement, and the surrounding rural villages and hamlets, is recognised in the Core Strategy.
- 3.1.3 It must be noted however, the housing policies in the adopted Development Plan were prepared to meet the housing requirement of the East Midlands Regional Plan and do not address the latest evidence on local housing need. These policies therefore are inconsistent with the Framework's requirements and the Government's objective of significantly boosting the supply of homes.

3.2 Emerging Development Plan

- 3.2.1 To meet the requirements of the Framework the Council is currently reviewing the Core Strategy and the Council is still in the early stages of plan preparation. It is therefore vital that the NVNP provides flexibility to ensure that the policies contained within the Plan are capable of being effective over the duration of its plan period and not ultimately superseded by s38(5) of the Planning and Compulsory Purchase Act 2004.
- 3.2.2 Hinckley & Bosworth Borough Council most recently held an emerging Local Plan Review consultation entitled 'New Directions for Growth' which closed in March 2019. The Local Development Scheme sets out the timescales for the adoption of the Local Plan Review with the eventual adoption of the plan expected in April 2021. It is observed however that this Local Development Scheme is now out of date and the timescales for the preparation of the emerging Local Plan are behind schedule.

4 NEWBOLD VERDON NEIGHBOURHOOD PLAN POLICIES

4.1 Context

4.1.1 These representations are made in response to the current consultation on the Regulation 16 Version of the Neighbourhood Planning (General) Regulations 2012. This chapter of our representations highlights the key points that Gladman raise regarding the content of the NVNP as currently proposed.

4.1.2 As currently proposed, Gladman believe that several of the NVNP's policies require modification/amendment, before they can be considered consistent with the Neighbourhood Plan Basic Conditions.

4.2 Chapter 7A: Housing Provision

4.2.1 Gladman note that the NVNP is being prepared at a time when there remain significant uncertainties in establishing the housing need for Hinckley and Bosworth, and Newbold Verdon more locally. Indeed the Parish Council acknowledge in Chapter 7a that the full scale of housing requirement for the Neighbourhood Plan can only be fully established once the Hinckley and Bosworth Local Plan Review has reached a sufficiently advanced stage.⁵

4.2.2 In determining the minimum number of homes needed for the emerging Hinckley & Bosworth Local Plan Review, the housing requirement will be based upon a local housing needs assessment, defined using the standard method. Applying the standard method based on the 2014 household projections results in a requirement of 457 dwellings per annum and represents the **minimum** level of housing need required for Hinckley and Bosworth up to 2036.

4.2.3 PPG⁶ confirm the existence of a set of circumstances that exist in which the adoption of a higher housing requirement is justified. One such circumstance is an authority agreeing to take on unmet need from neighbouring authorities, as set out in a statement of common ground.

4.2.4 The City of Leicester Draft Plan, published for consultation in February 2020, identifies an unmet need of 7,742 homes up to 2036. Given the close relationship between Hinckley & Bosworth and the City of Leicester, it is considered highly likely that a significant proportion of the unmet need arising from the City of Leicester will be accommodated in Hinckley and Bosworth, in a manner that is consistent with achieving sustainable development in line with the Framework.

4.2.5 The housing requirement for Hinckley and Bosworth, and in turn sustainable settlements such as Newbold Verdon, is therefore likely to increase significantly in light of emerging evidence. Given this, it is essential that the NVNP is prepared with appropriate flexibility ahead of the preferred strategy for the Local Plan Review being known. This would be in accordance with Paragraphs 11

⁵ Newbold Verdon Neighbourhood Plan, Submission version 2020. Chapter 7, p15.

⁶ See PPG Paragraph 010 Reference ID: 2a-010-20190220

and 16(b) of the Framework and the requirement for policies to be prepared positively whilst sufficiently flexible to be able to adapt to rapid change.

4.2.6 Taking this into account, Gladman are concerned that **Policy H2: Settlement Boundary** is not sufficiently flexible to respond to significant changes in housing requirement. The current approach taken by the NVNP is not appropriate given that it would preclude the delivery of sustainable growth from coming forward adjacent to the settlement.

4.2.7 Gladman consider that Policy H2 should be modified and it is considered that the NVNP would be better served by a criteria-based approach consistent with the requirements of national policy, this will enable the NVNP to respond positively to rapid changes with regards to the amount of new homes required. The following wording is put forward for consideration:

“When considering development proposals, the Neighbourhood Plan will take a positive approach to new development that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. Applications that accord with the policies of the Development Plan and the Neighbourhood Plan will be supported particularly where they provide

- **New homes including market and affordable housing; or**
- **Opportunities for new business facilities through new or expanded premises; or**
- **Infrastructure to ensure the continued vitality and viability of the neighbourhood area.**

Development proposals that are considered sustainable and well related to the existing settlement will be supported provided that the adverse impacts do not significantly and demonstrably outweigh the benefits of development.”

4.3 Policy H4: Windfall Sites

4.3.1 Echoing our comments on policy H2, policy H4 as currently drafted is too restrictive and limits new development to within the defined settlement boundary. Given the housing requirement for Newbold Verdon over the plan period is likely to increase, Gladman contend that the policy should be reworded to support sustainable development opportunities well related to the existing settlement.

4.4 Policy H5: Housing Mix

4.4.1 The above policy requires new development proposals to provide a mixture of housing types specifically to meet the latest assessment of identified local needs in Newbold Verdon and Gladman acknowledge the need for smaller family homes and dwellings suitable for those with restricted mobility disabilities or special needs requiring support in the community.

4.4.2 We suggest the policy requires further modification however and suggest the element of the policy that states *“Larger homes (4 or more bedrooms) can feature in the mix of housing but will be expected*

to provide a minority on any single site” is deleted from the Neighbourhood Plan. The approach advocated by the Parish Council is too restrictive by seeking to limit larger family homes and could potentially impact the viability of future proposals.

4.5 Policy ENV1: Protection of Local Green Spaces

4.5.1 Policy ENV1 designates three sites as Local Green Space (LGS). Land off Kirkby Lane currently being promoted by Gladman overlaps with LGS 028 Newbold Spinney. If the Neighbourhood Plan is revised, taking on board our comments at 4.2, and does not seek to arbitrarily restrict sustainable development opportunities in Newbold Verdon, this LGS could be managed as part of any future planning application.

4.5.2 The potential ongoing management and maintenance of Newbold Spinney would ensure the LGS remains an integral part of Newbold Verdon’s natural environment for current and future generations.

4.6 Policy ENV2: Protection of Sites and Features of Environmental Significance.

4.6.1 Policy ENV2 identifies 27 sites that are known to be of at least local significance for biodiversity and/or history. Gladman reiterate our response from the regulation 14 consultation and state Policy ENV2, alongside Policy ENV4, fail to make a distinction and recognise that there are two separate balancing exercise which need to be undertaken for national and local designated site sites and their settings. Policy ENV2 and Policy ENV4 should be revisited to ensure that they are consistent with the guidance contained within the Framework.

4.7 Policy ENV5: Landscape Character Areas

4.7.1 As currently worded, this policy will likely prejudice the delivery of sustainable development opportunities as it is based on maintaining the existing status quo of the existing landscape features surrounding the settlement as opposed to incorporating new development opportunities within the existing landscape setting of the area in order to provide new vistas and views available to both existing and future residents.

4.7.2 Gladman consider that Policy ENV5 requires modification to ensure it is consistent with the provisions of the Framework, which indicates that the planning system should recognise the character of the countryside to support thriving local communities within it. This policy should therefore be modified so that applicants recognise the character of the countryside within any proposals for development rather than seeking to protect existing landscape features to maintain the current status quo which may not contain any landscape features worthy of significance.

4.8 Policy ENV6: Safeguarding Important Views

- 4.8.1 Policy ENV6 identifies 6 important views that proposals for development will be required to respect. The policy continues to state proposals which would have an unacceptably detrimental impact on the identified views and vistas will not be supported.
- 4.8.2 The supporting text to Policy ENV6 refers to the supporting 'environmental inventory', which provides the evidence base in support of the policy. The 'environmental inventory' principally focuses on identifying sites of environmental significance and confirms the sightlines of the suggested views.
- 4.8.3 For a view to be identified for protection there should be demonstrable physical attributes that elevate its importance out of the ordinary, rather than seeking to protect views of the open countryside due to their pleasant sense of place. To pass such a high bar any such views should be clearly identified with the key characteristics and attributes detailed. This is essential to conform with national policy and guidance and case law regarding key views.
- 4.8.4 Having reviewed the documents in support of Policy ENV6, Gladman submit the evidence base does little to indicate why these views should be protected. Opinions on landscape are highly subjective, therefore, without further evidence to demonstrate why these views and landscape areas are considered special, the policy does not provide support for a decision maker to apply the policy predictably and with confidence.
- 4.8.5 Gladman therefore suggest that Policy ENV6 should be revisited and appropriate evidence provide to justify the inclusion of the policy. If this evidence is unavailable, then Gladman contend the policy should be deleted from the Neighbourhood Plan.

4.9 Policy ENV7: Footpaths and Bridleways

- 4.9.1 Policy ENV7 states that any proposals that result in the loss of, or have significant adverse effect on, the existing network of footpaths and bridleways will not be supported. Whilst we acknowledge the desired protection of all public rights of way, we consider it important that the policy recognises that that the Council should assess the harm, in respect of the loss or degradation of a public right of way, as part of the planning balance, against the public benefits of any proposal. Where there is deemed to be substantial harm, then the proposal would need to achieve substantial public benefits to outweigh that harm.
- 4.9.2 Gladman believe that this policy needs to be redrafted in order to ensure that it conforms with the guidance and requirements set through national policy.

4.10 Community Action ENV4: Footpaths and Bridleways

- 4.10.1 The above Community Action seeks to ensure the Parish Council works with landowners, Leicestershire County Council, community groups and other bodies to achieve enhancements to the present network of walking routes.

- 4.10.2 Gladman are committed to providing improvements to the Public Right of Way in the Parish. In particular Route 95, as indicated on Figure 18, overlaps with our land interests and as part of any eventual planning application improvements to the Public Right of Way will be incorporated into the proposals.

4.11 Policy T1: Travel Requirements for New Development

- 4.11.1 Policy T1 outlines the travel requirements for new developments including the provision of travel packs, public transport timetables and 6 months' free bus passes. Whilst acknowledging the intention of this policy, Gladman are of the view that this is a matter best suited to Leicestershire County Council to determine through their own policies. Consequently this policy should be removed from the Neighbourhood Plan.

4.12 Monitoring & Review

- 4.12.1 Chapter 8 of the NVNP details how during the plan period, it is likely that circumstances which the Neighbourhood Plan seeks to address will change. The chapter states the Parish Council proposes to formally review the Neighbourhood Plan in 2023, or to coincide with the review of the Hinckley and Bosworth Local Plan.
- 4.12.2 Echoing our comments made at 4.2, it is highly likely that the established housing requirement for Hinckley and Bosworth will increase significantly in light of the unmet need arising from the City of Leicester. The increased housing requirement for the authority will in turn impact on the Neighbourhood Plan and the number of homes it should provide for.
- 4.12.3 Whilst Gladman acknowledge the Parish Council's intention as set out in Chapter 8, to ensure the Neighbourhood Plan is clear and concise we suggest the commitment to review the NVNP is reinforced as an actual policy in the Neighbourhood Plan. The following wording is put forward for consideration as a new policy:

Policy MR1: A full review of the Newbold Verdon Neighbourhood Plan will be commenced within 6 months of the publication of the Local Plan Review for Hinckley & Bosworth (defined as publication of an invitation to make representations in accordance with Regulation 19 of the Town and Country (Local Planning) (England) (Regulations 2012).

In the absence of the publication of the Local Plan Review for Hinckley and Bosworth, a full review of the Newbold Verdon Neighbourhood Plan will commence within 6 months of January 1st, 2023.

5 SITE SUBMISSION

5.1 Land off Kirkby Lane, Newbold Verdon

5.1.1 Gladman are promoting land off Kirkby Lane for residential development and associated community infrastructure. A location plan is available at Appendix A of this submission.

5.1.2 The site represents a suitable and sustainable location for housing, well located to the existing settlement. Gladman consider that the site has the potential to deliver the following benefits:

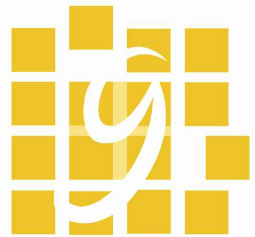
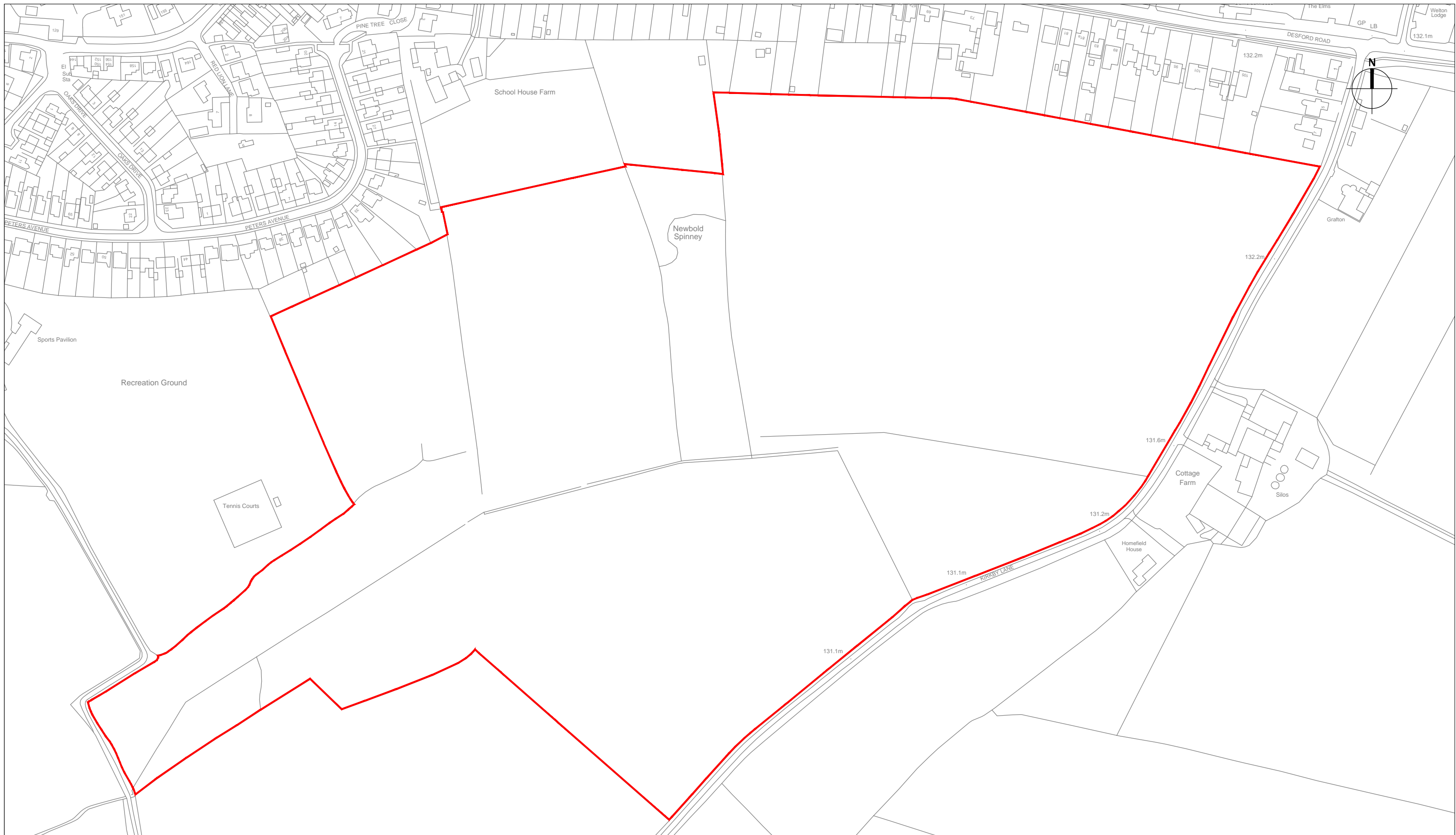
- Much needed market and affordable housing of a suitable mix of housing types and sizes to meet the strategic needs of the local housing market;
- Provision of new public open space facilities to serve existing and future residents;
- Significant areas of green infrastructure with associated ecological and wildlife benefits;
and
- Improvements to the local economy and increased footfall to the existing businesses in Newbold Verdon.

6 CONCLUSIONS

- 6.1.1 Gladman recognises the Government's ongoing commitment to neighbourhood planning and the role that such Plans have as a tool for local people to shape the development of their local community. However, it is clear from national guidance that the NVNP must be consistent with national planning policy and the need to take account of up-to-date housing needs evidence. If the plan is found not to meet the Basic Conditions at Examination, then the plan will be unable to progress to referendum.
- 6.1.2 The Parish Council must ensure that the policies within the NVNP allow for sufficient flexibility and are based on robust and justified evidence. Without the changes suggested being incorporated we submit that the NVNP does not meet basic conditions (a), (d) and (f), and amendments will need to be made to the Neighbourhood Plan to meet the basic conditions.

APPENDIX A

Site Location Plan



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Rev	Date	By	Revision notes
*	*	*	*
Status			
STATUS			

Project	Kirkby Lane Newbold Verdon
Title	Red Line Plan

Drawn by DMF	Issue date 03-03-20
Title checked by CHECKED BY	Title checked date CHECKED_DATE
Highways checked by CHECKED BY	Highways checked date CHECKED_DATE
Topo checked by CHECKED BY	Topo checked date CHECKED_DATE
Scale(s)	
1:2500@A3	
Drawing No	
2020-020-001	