

Response to HBBC Representation

Submission Version Policy reference / Page number	HBBC Regulation 14 comments (reference to page numbers and policies in the Regulation 14 Pre-Submission Version)	HBBC Regulation 16 Comments	Qualifying Body Response
Page 7	n/a	The final note in bold at the bottom of the paragraph is strange. In what instance would relevant development plan policies be ignored as this would mean that the decision is unsound and could be challenged through Judicial Review?	The note is accurate and relevant.
Policy M1	<p><u>Policy M1</u>: In the recent Burbage Examiner's Report it was recommended that where the NDP 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 Borough Council believes that criteria 1 of</p>	<p>References to existing policies remain.</p> <p>The following comment remains: The policy states that <i>'The following types of development may be considered sustainable'</i>. The word 'may' open the policy up to challenge and misinterpretation; it is recommended the wording is amended from 'may' to 'will'.</p>	<p>See the Report of the Independent Examiner on the Sheepy Neighbourhood Plan recommendation 5.1.</p>

	<p>policy M1 is unnecessary as it repeats existing policy and does not provide any additional detail. If the Group would like to keep a reference to DM14 and DM15 this could be included in the supporting text as an alternative.</p> <p>As highlighted above, making reference to other neighbourhood plan policies is repetitive and it is recommended that references to policy codes are removed. As an alternative the group could consider the following:</p> <p>Amend criteria 2 to – Infill housing development</p>		
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	<p>Amend criteria 3 to – Development and diversification of agricultural and other land-based rural businesses</p> <p>Amend criteria 4 to – Brownfield Development</p> <p>Amend criteria 6 to – Renewable energy</p> <p>If the group feel it would be beneficial to retain the reference to the policies, this could be included outside of the policy as supporting text.</p> <p>The policy states that '<i>The following types of development may be considered sustainable</i>'. The word 'may' open the policy up to challenge and</p>		
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	<p>misinterpretation; it is recommended the wording is amended from 'may' to 'will'.</p> <p>Criteria 4-6 of the policy would only apply if a planning application were submitted by a statutory undertaker or a public utility provider. The Town and Country Plan Act (1990) defines statutory undertakers as: <i>'persons authorised by any enactment to carry on any railway, light railway, tramway, road transport, water transport, canal, inland navigation, dock, harbour, pier or lighthouse undertaking or any undertaking for the supply of hydraulic power and a relevant airport operator'</i>. A public utility provider can be defined as: Businesses that provide the public with</p>		
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	<p>necessities, such as water, electricity, natural gas, and telephone and telegraph communication. The limitation of these criteria to the above bodies does not achieve sustainable development and would be problematic to apply at the planning application stage; the LPA would not be able to restrict applicants for such uses to only these bodies. An example of where this policy is overly restrictive is if a planning application were to be submitted for a tourism facility which supports the role of the National Forest it would be considered unsustainable if it were submitted by someone who wasn't a statutory undertaker or utility body. It is suggested that this is reconsidered and there is potential that this</p>		
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	<p>would fail basic condition a) sustainable development as renewable energy and recreation and tourism would be considered unsustainable in the countryside if it were to be submitted by someone other than a statutory undertaker or utility provider.</p> <p>It is also queried that Development by statutory undertakers is read as a title or whether this should be an individual point in the policy.</p> <p>How has the settlement boundary changed compared to what is included in the Borough Council's Local Plan? The NDP should expand on how the settlement boundary has changed. As highlighted by a neighbourhood plan</p>		
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	<p>examiner in recent examinations (See the Sheepy Neighbourhood Plan Examiner's Report), Neighbourhood Plans must clearly set out where settlement boundaries have changed and how. Perhaps highlighting what methodology was used to determine the new boundary. See HBBC's Settlement Boundary Revision Topic Paper as an example methodology.</p>		
<p>Map 2, page 12</p>	<p><u>Map 2, page 14</u>: It is recommended that the map is focused more on the settlement boundary, it is not necessary to cover the whole of the designated area. As presented, it is difficult to interpret the exact boundary and this would be</p>	<p>This map has been greatly improved since the pre-submission version however it is recommended that the settlement boundary is revisited around the housing allocation to ensure that it follows the proposed development. This could be done by comparing it to the current planning application for the site. The neighbourhood boundary line is layered over the top of the settlement boundary which makes it difficult to interpret the eastern</p>	<p>See paragraph 6.18 of the Submission Draft Neighbourhood Plan. Jelsons Ltd Housing Mix Plan (Drawing no. 6675-A-11 B) is in the Markfield Neighbourhood Plan Evidence Base.</p>

	<p>problematic at the planning application stage. The map should be presented on a larger scale base map and be more focused for clarity. An A3 map may also aid interpretation. This map is referred to as a map whereas other maps are labelled as figures. There should be consistency in the labelling, for example all maps and diagrams be labelled as figures. This was a modification in the recent Burbage Examiner's Report.</p>	<p>boundary of the settlement. As the designated area boundary is illustrated on Map 1 this layer could be turned off so that it is just the settlement boundary being shown on this map. All lines of the settlement boundary need to be visible.</p>	
<p>Figure 2, page 13</p>	<p><u>Figure 2, page 15</u>: This map has lost clarity, there is no scale, or copyright, place names and the legend are blurred and difficult to read. The base map could be improved to aid its interpretation. This map is referred to as a figure whereas other maps are</p>	<p>No changes made, agree with previous comment</p>	<p>Largely irrelevant as the whole of Markfield Parish lies within the Charnwood Forest (see paragraph 4.3).</p>

	<p>labelled as maps. There should be consistency in the labelling, for example all maps and diagrams be labelled as figures. This was an outcome of the recent Burbage Examination.</p>		
<p>Figure 3, page 14</p>	<p><u>Figure 3, page 16:</u> This map has lost clarity, there is no scale, and the copyright and place names cannot be read. The quality of the map should be improved so it is clear where the Charnwood Forest lies. This map is referred to as a figure whereas other maps are labelled as maps. There should be consistency in the labelling, for example all maps and diagrams be labelled as figures. This was an outcome of the recent Burbage Examination.</p>	<p>No changes made, agree with previous comment</p>	<p>Largely irrelevant as the whole of Markfield Parish lies within the Charnwood Forest (see paragraph 4.3).</p>

<p>Policy M2 page 15-16</p>	<p><u>Policy M2, page 17:</u> Bullet point 5 indicates the importance of several views and vistas; this would be difficult to be applied to a planning application without them being mapped. What are the important views and vistas in these locations? If they are a wide 'hilltop' view then the wider area views will unlikely be uninterrupted unless there was high-rise development proposed, which is unlikely. This is something which was discussed in detail at the recent Burbage NDP examination and a map was inserted (see figure 27, page 66 of the Burbage Neighbourhood Plan Referendum Version)</p>	<p>The policy has been amended from a bulleted list to a numbered list which is welcomed. However, the comment remains in relation to criteria 5 in regards to the application of this criteria at the planning application stage.</p> <p>Comment remains in relation to pony paddocks in criteria 4.</p> <p>Pony paddocks and menage are part of the rural character there does not appear to be justification for this inclusion, and it should be removed. The Council cannot "control" it can prevent. In what circumstances are pony paddocks not acceptable? If they are not located in the Countryside, then where should they be located do you expect them to be located?</p> <p>Criteria 5 Are these views defined elsewhere in the document?</p>	<p>Maps of views and photographs have been added to the Markfield Neighbourhood Plan Evidence base.</p> <p>Planning permission is required for the change from agricultural use to the keeping of horses for recreational purposes. Field shelters, hard-standings, muck-heaps, stables, tack-rooms etc. also require planning permission. The introduction of small parcels of land to keep ponies or horses in, can potentially erode landscape character, without some form of control.</p>
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	<p>Control of conversion of farmland to pony paddocks is confusing, what does it mean? The use of word control isn't clear and isn't a term used in planning policy. Pony Paddock isn't a term we would use, but a pony paddock would be a rural use in the countryside and is highly unlikely to be in a settlement so needs to be in countryside. Maybe this point needs to be in M1 not M2 as it's a use not a landscape character issue?</p>		
National Forest	<p><u>Page 19</u>: A number and title needs to be added to this policy.</p> <p>New developments – needs defining as this encompasses almost everything even house</p>	The policy relating to the National Forest has been removed from the Submission Plan	

	<p>extensions, dropped kerb as these are classed as development. Need better definition, there is something in the text above, but it needs to be within the policy for clarity.</p> <p>Should it just refer to national forest planting guidelines, this then allows for any update to these if there was one and avoiding the policy to become out of date.</p> <p>Identifies off-site planting within the neighbourhood area only, this isn't justified as it is not clear if any areas are available within the Neighbourhood Area for offsite planting? Possibly could add a sequential approach to try and get it</p>		
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	<p>within the neighbourhood areas first and then if they can't achieve that then it needs to be within the National Forest Area.</p>		
<p>Paragraphs 4.18-4.22 page 19-20</p>	<p><u>Paragraphs 4.18-4.22 page 19-20</u>: The Borough Council have recently published a new Green Infrastructure Study (September 2020) and it is recommended that this chapter is updated as the 2008 Study is now redundant. The most recent study can be viewed here.</p>	<p>Plan has been updated to reflect the current Green Infrastructure Study (2020)</p>	
<p>Policy M3</p>	<p><u>Policy M3</u> Most of these points are aims and objectives – should this be moved to a community action aim rather than a policy similar to the Burbage NDP. The London Road sentence could possibly be a policy.</p>	<p>The policy has been updated and amended to read less like aims and objectives.</p>	

	<p>What is the evidence for the policy and are they deliverable?</p> <p>Green infrastructure what is this and how is it defined as a lot in the policy appears to be about sustainable travel option. In Core Strategy we have Green Infrastructure policies and its green spaces and habitats not transport and access. This needs to be consistent.</p>		
<p>Map 3, page 18</p>	<p><u>Map 3, page 21</u>: The map appears to be stretched and is difficult to interpret. It is recommended that the Group look at Figure 21, page 47 of the Burbage Neighbourhood Plan Referendum Version and</p>	<p>Map has been amended and is now larger in size although concerns remain in relation to the useability of the map and identification of sites. The green corridors need to be able to be clearly identified so the map can be used easily and successfully.</p>	<p>Local Green Infrastructure is also shown on the Policies Maps at the rear of the document which are at A3 size.</p>

	<p>follow a similar format. This map is larger in size and uses a different base map. All spaces are numbered and labelled on the Plan making it easier for interpretation. This map was a result of a modification in the Examiner's Report.</p>		
<p>Map 4, page 21</p>	<p><u>Map 4, page 24:</u> The map appears to be stretched and is difficult to interpret. It is recommended that the Group look at Figure 21, page 47 of the Burbage Neighbourhood Plan Referendum Version and follow a similar format. This map is larger in size and uses a different base map. All spaces are numbered and labelled on the Plan making it easier for interpretation. This map was a result of a modification in the Examiner's Report. The designated Area boundary</p>	<p>Amended, no further comments.</p>	

	<p>should be included in the legend. The acronym RIGS should be in full, or are these Local Nature Reserves? There are no Local Nature Reserves shown on the map, but they are included in the legend as a pink site.</p>		
<p>Policy M4</p>	<p>Policy M5: The policy refers to Map 3, should it refer to Map 4?</p> <p>Last two points could be argued they aren't necessary to make the development acceptable, for example a tree coming to the end of its life would be a loss irrespective of development. Maybe these last 2 points should be something to consider in the landscaping of a scheme and could be placed in the text?</p>	<p>Reference to the map has been removed. It would be useful to include in the supporting text further information regarding the code used before the title of the Local Wildlife Site. It is assumed that these are the reference numbers given by Leicestershire Environmental Records Centre (LERC) this could be explained in the supporting text.</p> <p>Not all the spaces listed in this policy are contained on the map, is it the intention of the user of the policy to go to LERC or Leicestershire County Council to identify the boundaries for themselves?</p>	<p>The referencing used on Map 4 is cross-referenced to Policy M5. We believe all places listed in Policy M5 are shown on Map 4 and the Policies Maps. The data and boundaries for these designations have been sourced from LERC.</p> <p>The Environment Bill introduces statutory measures to restore and enhance nature - through 'biodiversity net gain'. The Government is planning to consult on the detail of the secondary legislation for biodiversity net gain with publication of the final version of the biodiversity metric this Spring.</p>

	<p>National Planning policy sets out an expectation that planning policy should distinguish between the hierarchy of international, national and local designated wildlife sites, as well as to identify wildlife corridors and steppingstones. This policy sets out to achieve this by identifying Local Nature Reserves and Local Wildlife Sites. It would be beneficial to make it clear that Billa Barra Hill; Hill Hole Quarry and Alter Stones are all Local Nature Reserves by including the designation title before their listing, similar to what the policy does for Local Wildlife Sites.</p>	<p>How will biodiversity enhancement be secured? Is this intended to be a S106 requirement? Is this CIL compliant?</p>	
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Policy M5	n/a	<p>All tree surveys should be in accordance with BS5837:2012</p> <p>What does “good amenity” value mean. Does it mean category A and B trees?</p>	<p>‘Amenity’ is not defined in law, so the authority will need to exercise judgment when deciding whether the requirements of Policy M5 have been met. It is a common planning concept for local planning authorities to maintain and enhance the amenity value provided by trees.</p>
<p>Pages 24-26</p> <p>Policy M6</p> <p>Appendix 1</p>	<p>Pages 26-27, Para 4.37-4.38</p> <p><u>Policy M6</u> Paragraph 4.37 refers to an Appendix 1; however, there is not an Appendix 1 to the NDP.</p> <p>LGS designations need to be justified against the criteria set out in paragraph 100 of the NPPF:</p>	<p>Appendix 1 has now been included within the document.</p> <p>It appears that Appendix 1 is the sole justification for the LGS designations and further documentation has not been provided. The Borough Council has previously advised the NDP Group what type of evidence should be used for these designations and provided examples so that the Group can clearly demonstrate the spaces warrant Local Green Space protection. The LGS do not meet all of the criteria</p>	<p>Appendix 1 is a summary of reasons for LGS designation. Full reasons are included in the Markfield Neighbourhood Plan Evidence base.</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; andc) local in character and is not an extensive tract of land'. <p>From the information provided it is not clear how the LGS have been identified, scored and selected or how the LGS relate to these four NPPF criteria and as a result the justification for these</p>	<p>set out in Appendix 1 but have still been selected as LGS, there is no clear justification for the allocation.</p> <p>The Borough Council's previous comments remain in relation to the evidence behind the allocation of the LGS.</p> <p>With the exception of the Two Upper Greens (LGS 1) all of the LGS are identified as Open Space, Sports and Recreational Facilities in the Site Allocations and Development Management Policies DPD (2016) and are protected by policy DM8 within this DPD. If it can not be demonstrated that these open spaces meet the NPPF LGS test they are still protected.</p>	
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	<p>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 have clear robust evidence to support their selection and designation.</p> <p>Except for the Two Upper Greens (LGS I) all of the LGS are identified as Open Space, Sports and Recreational Facilities in the Site Allocations and Development Management Policies DPD (2016) and are protected by policy DM8 within this DPD. If it can not be demonstrated that these open spaces meet</p>		
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	<p>the NPPF LGS test they are still protected.</p> <p>Need justification for these sites to warrant LGS status. The majority of these spaces do not need designating as Local Green Space as they are already protected; this is not the point of a Local Green Space. They are existing parks should this be changed to a play and open space policy/Play provision to discuss retention and enhancement? LGS should be areas which are not protected such as an area that is well used and accessible but isn't a formal park.</p> <p>LGS J is not shown on the map.</p>		
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<p>Policy M7: Renewable Energy</p>	<p><u>Policy M7</u>: The supporting text highlights the importance of renewable energy is for reducing the impact of climate change but policy is quite restrictive in how renewable energy can be achieved.</p> <p>A blanket assumption that Markfield Neighbourhood Area is not suitable for wind turbine installations does not promote sustainable development and is contrary to basic condition a). Is this backed by evidence? Justification for no wind turbines at all should be given to support this policy restriction. The Site Allocations and Development Management Policies DPD does not contain a policy on wind turbines, it directs</p>	<p>Regulation 14 comments remain relevant</p>	<p>One of the key factors determining the acceptability or otherwise of wind turbines is their potential impact on the local landscape – this is due to their height and the movement they introduce into the landscape (i.e. rotating blades). The Renewable Energy Capacity Study found that the landscapes in Hinckley and Bosworth have a moderate/moderate high sensitivity to large scale turbines. The Neighbourhood Area is particularly sensitive to wind turbines because its distinctive landform allows for great inter-visibility with the surrounding countryside. The Area is also part of the Charnwood Forest Regional Park and National Forest. In the past planning applications for wind turbines at Little Markfield Farm (Ref: 14/01258/FUL) and Stanton Lane Farm (Ref: 12/00399/FUL and 12/00091/FUL) have either been refused or withdrawn.</p> <p>Paragraph: 033 Reference ID: 5-033-150618: “The written ministerial statement made on 18 June 2015 clarifies that when considering applications for wind energy development, local planning authorities should (subject to the transitional arrangement) only grant planning permission if ... following consultation, it can be demonstrated that the planning impacts identified by affected local</p>
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	<p>applicants to the NPPF and NPPG. The NPPG gives detailed guidance on the assessment of wind turbine applications to enable the approval of such installations in appropriate places</p> <p>Has an assessment of available brownfield sites or non-agricultural land available to solar farms been undertaken? This policy is restrictive and should be removed. There is a 'get out' in the policy 'wherever possible'; however the inclusion of this gives an expectation which isn't realistic.</p>		<p>communities have been fully addressed and therefore the proposal has their backing."</p>
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M8	It is recommended that this policy is expanded to include all new residential developments. This is something which is contained within The Good Design Guide SPD . The LPA can and have secured conditions to secure this. Supported by Policy DM10 of the SADMP DPD.	Amendments have been made to this policy although there is potential for the policy to go further with the inclusion of EV charging points for new / redevelopment of existing employment sites i.e. 1 charging point for every 10 spaces.	Policy M8 requires Electric Vehicle Chargepoint provision in connection with non-residential developments.
Map 6, page 33	<u>Map 6, page 34</u> The map appears to be stretched it is recommended that the map is reinserted within the document	Changes made, no further comment	
Para 4.62	<u>Para 4.64</u> Should this read Map 6 rather than Map 5?	Changes made, no further comment	
Para 4.64-65	<u>Para 4.66-67</u> These paragraphs read like a policy rather than supporting text.	These paragraph's repeat paragraph's 194-195 of the NPPF, should the NPPF be referenced here?	See paragraph 4.63.

Map 7, page 35	<u>Map 7</u> The map does not fit on the page; the title is missing and the copyright.	Changes made, no further comment	
Map 8, page 38	<u>Map 8</u> The map does not fit on the page, the copyright is missing.	This map has been greatly improved from the pre-submission version. It is recommended that the colours used for the map are re-visited so there is more of a contrast to make the map easier to interpret.	Designations have also been hatched for clarity.
Policy M9, Page 39	<p><u>Policy M9</u> This policy lists a number of non-designated assets and refers to their location on maps. It would be useful if these assets could be identified on the map so that the policy can be consistently applied. It is recommended that the Group look at Figure 21, page 47 of the Burbage Neighbourhood Plan Referendum Version and follow a similar format.</p> <p>There are 24 features of local heritage interest identified in</p>	<p>A letter on map 7 cross-references to the assets identified in Policy 9, although the clarity of the letters on the map is poor.</p> <p>The same comments as per Reg 14 still apply:</p> <p>There are 24 features of local heritage interest identified in Policy M9: Non-Designated Heritage Assets. Some of these features need clearer (full) addresses so their location can be identified, as the associated map only gives a general idea.</p>	<p>The Qualifying Body has to work within the constraints of the available mapping system.</p> <p>Further details of the Features of Local Heritage Interest (including addresses), including reasons for their designation are included in the Markfield Neighbourhood Plan Evidence base.</p> <p>The Qualifying Body has had regard to Historic England's advice 'Neighbourhood Planning and the Historic Environment' in the identification of the features of the area's historic environment that are valued by the local community and preparing policies to ensure the need for their conservation is given appropriate weight in decisions.</p>

	<p>Policy M9: Non-Designated Heritage Assets. Some of these features need clearer (full) addresses so their location can be identified, as the associated map only gives a general idea.</p> <p>It is not clear as to what is significant about these features; this must be clearly articulated in the Plan to allow for appropriate decision taking etc. Significance is defined in the NPPF as “the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic of historic”. More detail on these categories of interest is provided in the Planning Practice Guide (Paragraph 006 Reference ID:</p>	<p>It is not clear as to what is significant about these features; this must be clearly articulated in the Plan to allow for appropriate decision taking etc. Significance is defined in the NPPF as “the value of a heritage asset to this and future generations because of its heritage interest. The interest may be archaeological, architectural, artistic of historic”. More detail on these categories of interest is provided in the Planning Practice Guide (Paragraph 006 Reference ID: 18a-006-20190723) which is available here. This is further broken down within the Borough Council’s selection criteria for identifying local heritage assets which is available to view here.</p> <p>The above guidance provides the framework to identify significance, and it could be articulated in the Plan in many ways (see the Sheepy Plan for an example). Alternatively, if the NP Group feels that the information is already articulated in the supplementary evidence documents then this should be made clear and clearly signposted in the Plan.</p>	
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	<p>18a-006-20190723): https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment. This is further broken down within the Borough Council's selection criteria for identifying heritage assets: https://www.hinckley-bosworth.gov.uk/downloads/file/3571/suggested_selection_criteria</p> <p>The above guidance provides the framework to identify significance, and it could be articulated in the Plan in many ways (see the Sheepy Plan for an example). Alternatively, if the NP Group feels that the information is already articulated in the supplementary evidence documents then this should</p>	<p>In terms of Policy M9, there has been inconsistency between Inspectors so far (within the Borough) on whether a local heritage asset/non-designated heritage asset policy should be included in the plan. Sheepy NP has a local heritage asset policy that is consistent with Policies DM11 and DM12 of the SADMP DPD and para.197 of the NPPF, Burbage had drafted a similar policy but the Inspector suggested it was removed as it repeated local and national policy. The consistent element of both plans was the clear identification of local heritage assets and what makes them of significance, so that is the key element that needs to be achieved in this Plan.</p> <p>The wording says directly or indirectly this could mean everything. The wording should say "directly or within the setting of"</p>	
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	<p>be made clear and clearly signposted in the Plan.</p> <p>In terms of Policy M9, there has been inconsistency between Inspectors so far (within the Borough) on whether a local heritage asset/non-designated heritage asset policy should be included in the plan. Sheepy NP has a local heritage asset policy that is consistent with Policies DM11 and DM12 of the SADMP DPD and para.197 of the NPPF, Burbage had drafted a similar policy but the Inspector suggested it was removed as it repeated local and national policy. The consistent element of both plans was the clear identification of local heritage assets and what makes them of significance,</p>		
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	<p>so that is the key element that needs to be achieved in this Plan.</p>		
<p>Policy M10</p>	<p><u>Policy M10</u> Define jitties and setts in the text as this isn't clear and could be up for interpretation.</p>	<p>The wording '<i>Only development that reflects the traditional character of Markfield will be supported unless the development is of exceptional quality or innovative design</i>' is too strong especially on modern estates and areas outside of the Conservation Area in Markfield. It is suggested the following wording is used instead:</p> <p><i>Development that does not reflect the character of Markfield will be not be supported unless the development is of exceptional quality or innovative design.</i></p>	<p>Double negation is grammatically incorrect: any negative proposition must only contain one negative.</p>

Policy M11	<p><u>Policy M11</u> This is a weaker policy than the one contained in the Borough Council's Site Allocations and Development Management Policies DPD and would weaken the position in Markfield.</p> <p>It is recommended that the NDP could just include in the text for the purposes of DM25 these following site are applicable ...</p>	<p>Regulation 14 comments remain relevant, this policy is not strong enough. Suggest:</p> <p><i>The community facilities listed below should be retained in accordance with Site Allocations and Development Management Policies DPD Policy DM25:</i></p>	<p>Policy M11 is already cross-referenced to Site Allocations and Development Management Policies DPD Policy DM25.</p>
Policy M12	<p><u>Policy m12</u> This policy makes reference to Map 10; however Map 10 shows the potential housing allocation and not the Markfield Institute for Higher Education. This should be addressed through the preparation of the</p>	<p>Mapping change made and policy now refers to the correct Map.</p> <p>Point 2 of the Pre-Submission Version of Policy M12 has been removed from the Submission Version</p>	

	<p>Submission Version document.</p> <p>Point 2 – the buildings on site aren't of high quality and we don't want new buildings to reflect the existing, a more modern design would help enhance the character of this site. Recommend that this is changed this should be changes to be in accordance with the design policy and SPD.</p> <p>Point 3 – This should be reworded to read additional access should be avoided</p> <p>Point 4 – This is not justified as a landscaping scheme would not necessarily be</p>	<p>Point 2 (Submission Version) should be slightly reworded to:</p> <p><i>The use of any building for residential uses should be restricted to the staff and students of the Markfield Institute of Higher Education only; and</i></p> <p>Point 3, the word additional has been removed</p> <p>Point 4 of the pre-submission Version of Policy M12 has been removed from the Submission Version</p>	
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	needed unless a redevelopment of the site is proposed. Suggest change to landscaping on site should provide an improvement in biodiversity....		
Map 9, page 46	<u>Map 9</u> This Map does not fit entirely on the page and should be reinserted on a full A4 page in landscape so that it can be seen in its entirety.	Changes have been made to this map and it is now a lot clearer, however the Chitterman Way Neighbourhood Centre boundary is not shown in its entirety and the full extent of the boundary should be shown on the map.	The full boundary is shown on the two Policies Maps. To show the full boundary on Map 6 would require a scale of 1:5,000 instead of 1:2,500, with associated reduction in clarity.
Para 5.18 Policy M13	Policy M13 introduces the requirement for an impact assessment to be carried out if a proposal exceeds 200m ² of retail space outside of a neighbourhood/local centre. This is based on a proportionate approach against Policy DM21 of the SADMPDPD. Paragraph 89 of the NPPF allows for localised thresholds to be set and the NPPG provides further guidance on this. The NPPG	<p>The threshold size for an impact assessment has been amended from 200m² in the Pre-Submission Version of the NDP to 500m² in the Submission Version. There is no indication why this figure has changed, and previous comments remain in relation to this policy.</p> <p>The policy has been updated to reflect the change to the Use Class System and now refers to Commercial, Business and Service (Class E) uses. The policy applies the sequential test and impact assessment to Class E uses only, however, these do not apply to all Class E uses and would also apply to</p>	For inexplicable reasons, the Hinckley & Bosworth Town and District Centres Study 2017 excludes Markfield. However, recommendation HB10 states: 'In order to protect the vitality and viability of the Council's network of town and district centres, an impact assessment threshold of 500 sq.m (gross) should be adopted for all applications for retail and other 'main town centre' uses. This will help protect the network of town and district centres from inappropriate edge and out-of centre retail development, ensuring that the local authority retains the greatest level of control during the decision making process.'

	<p>states: <i>'In setting a locally appropriate threshold it will be important to consider the:</i></p> <ul style="list-style-type: none"> • <i>scale of proposals relative to town centres</i> • <i>the existing viability and vitality of town centres</i> • <i>cumulative effects of recent developments</i> • <i>whether local town centres are vulnerable</i> • <i>likely effects of development on any town centre strategy</i> • <i>impact on any other planned investment'</i> <p>Paragraph: 015 Reference ID: 2b-015-20190722</p> <p>The proportionate approach taken does not take the above into account and the LPA believe further work should be undertaken to</p>	<p>other Main Town Centre uses applicable to the parish i.e. public houses.</p> <p>The Policy is quite lengthy it is suggested that it could be reworded to:</p> <p><i>The Main Street Local Centre and Chitterman Way Neighbourhood Centre are defined on Map 9 and the Policies Maps. The vitality and viability of the Local and Neighbourhood Centres should be maintained and enhanced. Within these centres, proposals for Commercial Business and Service Uses² will be supported provided development proposals do not detract from the character of the area.</i></p> <p><i>Except where changes of use are allowed through permitted development, Commercial, Business and Service Uses² should remain the dominant use in both Centres and development leading to an over concentration of any other one use will not be supported. What does this mean? What is the tipping point?</i></p>	<p>It considered unreasonable to apply a sequential test and impact assessment to uses which are broadly discouraged by Policy M13, unless it to occupy a premises that has remained vacant for a period of at least six-months.</p> <p>'Development leading to an over concentration of any other one use will not be supported' will prevent, for example, too many take-aways in either centre. The authority will need to exercise judgment when deciding whether the requirements of Policy M13 have been met.</p> <p>The Qualifying Body prefers the current wording of Policy M13.</p>
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	<p>underpin the 200m² threshold so that the NPPG criteria are considered and the figure can be defended.</p> <p>The LPA undertook a Town and District Centre Study which identified a localised threshold for these types of centres, although Markfield NP would not require this level of detail for a localised threshold it gives an idea of the type of assessment which could be undertaken.</p> <p>In addition, the policy makes reference to the impact assessment being required if a development falls outside a Local and Neighbourhood Centre. The NPPF (Annex 2) defines what should be considered as a town centre,</p>	<p><i>Planning applications for uses other than Commercial, Business and Service Uses² will not be supported unless it to occupy a premises that has remained vacant for a period of at least six months.</i></p> <p><i>A sequential test will be applied to planning applications for Commercial, Business and Service Uses² that are not within either Centre. This conflicts with the NPPF which defines a minimum floor area where a sequential test is required.</i></p> <p><i>Proposals for Commercial, Business and Service Uses² should be located in the Local Centre, then in edge of Local Centre locations and only if suitable sites are not available should out of Local Centre sites be considered. When assessing applications for retail development outside of the Local Centre, an impact assessment will be required if the development is to provide more than 500m² retail floor space. This should include</i></p>	
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	<p>it states: <i>‘References to town centres or centres apply to city centres, town centres, district centres and local centres but exclude small parades of shops of purely neighbourhood significance’</i>. Therefore reference to <i>‘neighbourhood centres’</i> should be removed from the policy as their designation is largely one of protection and not promotion for significant additional development of main town centre uses.</p> <p>Last paragraph cannot identify A1 as this isn’t a Use Class anymore also a lot is now allowed by Permitted Development. Need to identify village centre uses and what is acceptable.</p>	<p><i>an assessment of the impact of the proposal on both Centres’ vitality and viability. Where an application fails to satisfy the sequential test or is likely to have an adverse impact on vitality and viability, it will not be supported. This is unnecessary as it repeats the requirements of the NPPF.</i></p>	
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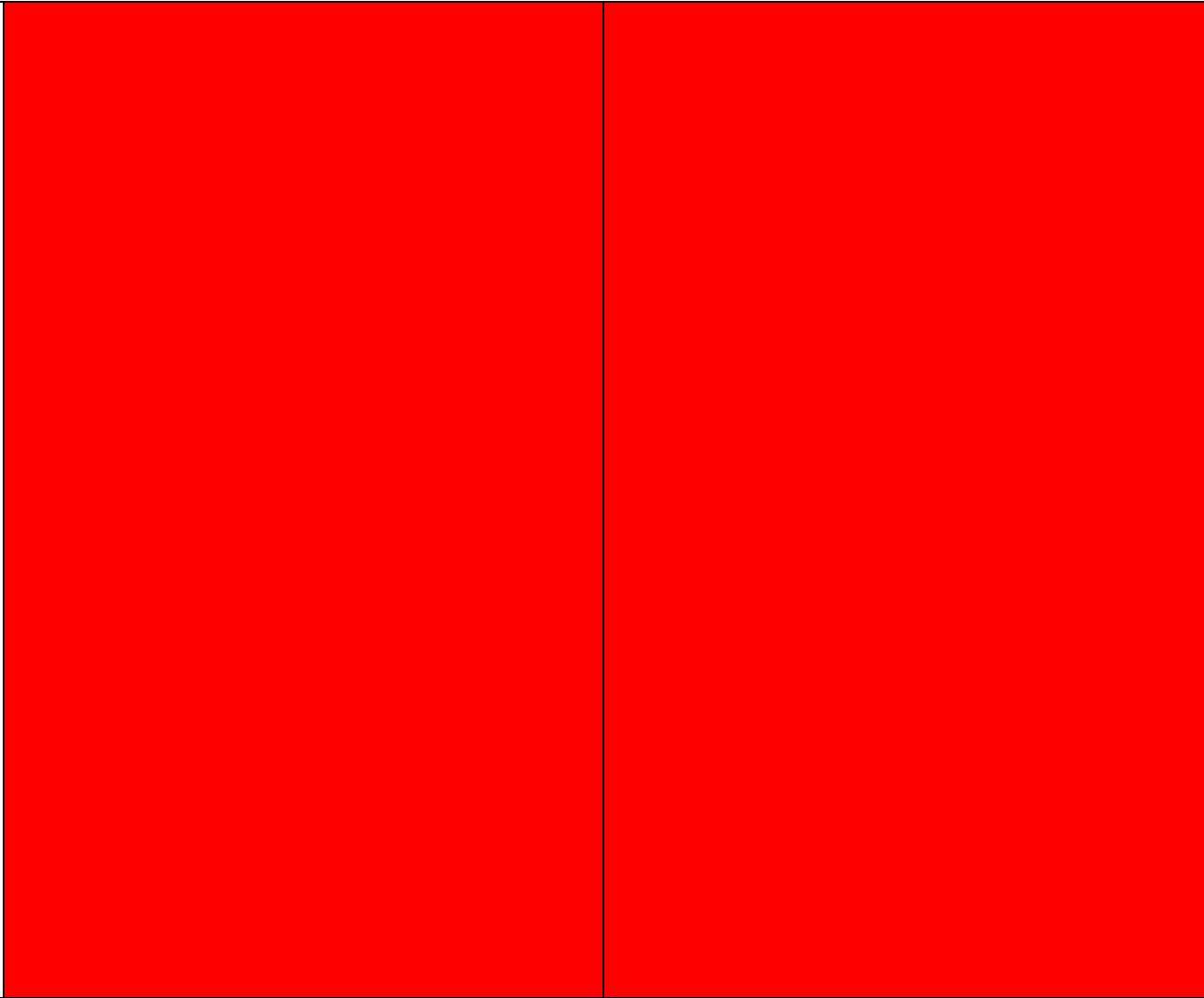
	There is an * but then this isn't explained anywhere		
Infrastructure Chapter Policy M14	The infrastructure section does not provide much information regarding where there are deficiencies in infrastructure provision, nor does it identify opportunities for infrastructure gain or enhancement, particularly from seeking funding from the proposed allocation Land South of London Road – Policy M16 only addresses on-site provision. Policy M14 Infrastructure seeks developer contributions towards infrastructure provision and lists a number of facilities for which the contributions could deliver 'improvement, remodelling or enhancement'. The document refers to the range of facilities	Regulation 14 comments remain relevant	<p>Policy M16 sets out several off-site infrastructure requirements, but unfortunately the Policy was not even referred to when full planning application for the development of 283 dwellings (20/01283/FUL) was determined, despite the Neighbourhood Plan being a material consideration.</p> <p>With no further large-scale development proposals supported by the Neighbourhood Plan, it is anticipated that Policy M14 will not be used too often. However, the details of the improvements required will largely depend upon the nature of the development proposed and may well vary over the plan period. The planning authority will need to exercise judgment when deciding whether the requirements of Policy M14 have been met.</p> <p>The infrastructure Capacity Study Baseline Assessment is deeply flawed and not a sound basis for determining infrastructure requirements. For example, in relation to primary healthcare it states 'Any new site allocations in Markfield may therefore need to include provision for a new surgery, and/or</p>

	<p>available, but it does not state what improvements have been identified, for example what improvements have been identified for Copt Oak Memorial Hall? Are these related to capacity and development pressures?</p> <p>Another example relates to the lack of quality and quantity of open space. Para 5.30 states, 'The greatest shortfall being formal parks. There are several open spaces which fall below the appropriate quality target, so there is a pressing need for improvements to increase the supply and quality of open spaces'. The group could pull this information into the document or supporting infrastructure schedule.</p>		<p>funding towards new provision elsewhere.'</p> <p>However, in relation to 20/01283/FUL, West Leicestershire CCG sought S.106 contributions area for an extension of the existing surgery to meet the needs of the population increase.</p>
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	<p>The Neighbourhood Plan is a good opportunity to undertake an audit of facilities and then consult with residents on what improvements in community facilities they would wish to see. The group may have already done this but there is no evidence of it. There are those infrastructure items which are the responsibility of infrastructure/service providers i.e. education and healthcare. The document refers to these and improvements in healthcare which is consistent with the findings of the Phase 1 infrastructure Study.</p> <p>I would suggest the group considers preparing an</p>		
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infrastructure schedule, informed by a consultation with residents and stakeholders which identifies new / improvements in infrastructure they feel is needed / wanted. Some items may become community actions and require funding that cannot be sought from development. The schedule could also set out a hierarchy or priorities. Capturing this information will also help DM negotiate S106 agreements. /ideally the schedule would be stand alone from the plan and remain a 'live' document which could be updated as and when improvements are delivered or priorities change.

Regarding Policy M14 infrastructure - as discussed above, the policy lists existing



	<p>facilities however this could limit what developer contributions may be sought in the future, particularly if they undertake an audit of facilities and complete an infrastructure schedule listing improvements. They could just refer to Policy DM3 Infrastructure and Delivery of the SADM otherwise I would suggest a similar overarching policy that refers to their infrastructure schedule if this is the approach they wish to progress. I also suggest that they wouldn't be able to seek developer contributions for items such as notice boards and litter bins – these may be provided on-site but not elsewhere in the settlement/parish.</p>		
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	<p>The infrastructure Capacity Study Baseline Assessment may just also provide them with a bit of context regarding healthcare, education and highways. See Section 5.2.12.</p>		
<p>Paragraph 6.3, page 55</p>	<p>The LPA issued advice to all neighbourhood plans during the Markfield NDP Regulation 14 consultation that the Borough Council Local Plan now uses the timeframe 2020-2039 rather than 2016-2036. The recently published Local Development Scheme (LDS) states that the draft Local Plan will be consulted on in Spring 2021. It is advised that the Markfield Neighbourhood Plan Group reconsider their Plan timeframe to align with the Local Plan.</p>	<p>The Markfield NDP timeframe has been realigned with the Borough Council Local Plan and now runs to 2039.</p>	

<p>Paragraph 6.5, page 55</p>	<p><u>Paragraph 6.5, page 55</u> As a consequence of the alignment with the Local Plan the housing figure should be updated to reflect this date (2020-2039). It is recommended that the standard methodology is referenced as this is the origin of the initial figure. It is recommended the wording is amended to:</p> <p>‘The national standard method for determining housing need gives a housing need for the borough of 452 houses per year or 8,588 over the period 2020-2039. Based on the latest data on population (2017 midyear estimates) Markfield parish accounts for 3.9% of the total borough population. Based on this share Markfield would</p>	<p>The figure contained in the Submission Version of the Neighbourhood Plan has been based on the figure provided by the Borough Council in the Regulation 14 comments all be it one unit different.</p>	
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	<p>have a housing requirement of 335 dwellings between 2020 and 2039. The borough has recommended that neighbourhood plans build in flexibility to their housing policies to allow for changes to the housing requirement once the local plan has progressed sufficiently to provide housing requirement figures at parish level. We have therefore incorporated flexibility by.....’</p> <p>It should be noted that by making this amendment any completions prior to April 2020 cannot be included, however it does mean that there is a lower starting figure of 335 compared to 382. If the Group wish to continue with a 2016-2036 timescale the Group need to provide</p>		
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	<p>justification for this and there is a risk the plan could be out of date quicker once the Hinckley and Bosworth Local Plan is adopted with a different time frame. If the period 2016-2036 is used the housing figure is slightly bigger at 352 as there is an extra year in that time period.</p>		
<p>Paragraph 6.11, page 56</p>	<p>Bullet point 2 – ‘see paragraph???’ this should be amended to the correct reference.</p>	<p>This has been removed no further comment</p>	
<p>Policy M15</p>	<p>It is important to build flexibility into the housing numbers as Neighbourhood Plan sets out the long-term housing provision within the area; this hasn’t been provided in the Draft Neighbourhood Plan. The housing figure should be expressed as a minimum as it</p>	<p>Regulation 14 comments remain relevant. Flexibility has not been included within the Plan. Although the housing figure has been updated to reflect the new timeframe it is not expressed as a minimum as advised in the Regulation 14 comments.</p> <p>A reserve site has not been included within the neighbourhood plan. The Borough Council advise groups to contain reserve sites so that</p>	<p>See Housing Note.</p>

	<p>enables greater variance to react to any changes such as if the Borough Council are required to plan for higher numbers than those in the current Local Plan, and with the new planning reforms outlined in the recent White Paper, and changes to the Standard Methodology. Flexibility could be incorporated into the Plan by identifying a reserve housing site or a second phase of the preferred allocation given the potential for a larger scheme on this site submission.</p> <p>Reserve sites allow you to have a say in what sites may be allocated in the future if a larger housing need is determined. Reserve sites give the Local Authority a good idea of what sites the</p>	<p>neighbourhood plan groups have a greater say in the direction of development if a larger housing need is determined.</p>	
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	<p>NDP have assessed as good alternative sites, and this would come into consideration when/if allocating through the Local Plan process if a higher need is determined. What are your thoughts on identifying reserve sites or a second phase of the allocation to help cater for potential future growth, and help in the instance of a future review of the NDP?</p> <p>Map 10 needs to be updated to show the changes to the site having access from London Road</p>		
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<p>Para 6.11, page 58</p>	<p><u>Para 6.13, page 57</u> The site selection material has not been made publicly available during this consultation and respondents have not been provided the opportunity to comment on this. The site selection documents should be made available for consultation so that the assessments are open and transparent.</p>	<p>The Site Selection Framework and Assessment Results have been made available on the Neighbourhood Plan website</p>	
<p>Policy M16, page 59</p>	<p><u>Policy M16</u> Criteria 4 and 6 – These criteria are repetitive. Have the Highway Authority been consulted to establish whether these are acceptable access points? If they have not been provided the opportunity to comment on this element they should be as a priority as the access points may not be viable and are set out in policy. Primary access should be from London Road, as agreed</p>	<p>There is a current planning application in for the London Road allocation. The planning application reference is 20/01283/FUL and the description is: Residential development of 283 dwellings (Class C3) including provision of public open space, associated infrastructure and engineering works and demolition of Vine Cottage. The planning application is due to go to Planning Committee on the 30th March 2021 and the application is recommended for approval. The Borough Council will be able to provide an update in relation to planning application during the Examination. The proposal is for 283 dwellings and the built development falls within the settlement boundary</p>	<p>The Qualifying Body is keen to ensure that the area will benefit from the protections set out in paragraph 14 of the National Planning Policy Framework. Therefore, it wishes Policy M16 to be retained. Indeed, as the decision notice for 20/01283/FUL has not been issued it is still possible for the ‘made’ Neighbourhood Plan to influence the details of the development.</p> <p>It would be helpful if the Local Planning Authority could set out how the Policy M16 criteria have been used to shape the proposed London Road</p>

	<p>through discussions with Parish and Development Management officers at the LPA – this will need to be reflected in the policy (points 4 and 6)</p> <p>Criteria 7 b) incomplete reference to right of way.</p> <p>Criteria 7 e) incomplete reference to the number of parking spaces to be provided. If a parking figure were identified, the LPA would have concerns that a reference to provision of ‘parking for xx cars’ for all new dwellings is included. The policy does not have proportionate regard for the types of dwellings being</p>	<p>identified within the NDP. It appears that the access points follow what are set out in Policy M16 as well as the green infrastructure requirements.</p> <p>Criteria 1 could be reworded to refer to a minimum of 280 dwellings rather than some 280 dwellings- this would be more consistent with how figures should be expressed as a minimum in planning policies</p>	<p>development and how they might usefully be applied in the future.</p>
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	<p>proposed, and no clear consideration has been given to consideration of Leicestershire County Council's 'Leicestershire Highways Design Guide' (which has superseded the 6Cs Design Guide). A recent appeal decision (APP/Y2430/W/18/3196456) has overruled a similar NP policy specifying two parking spaces. The Inspector noted that the NP parking standards are at odds with those contained within the 6C's Design Guide used by the Highway Authority, although acknowledging that, amongst other things, the policy seeks to ensure that adequate off-road parking is provided.</p>		
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	<p>Paragraph 105 of the NPPF (2018) states:</p> <p>“If setting local parking standards for residential and non-residential development, policies should take into account:</p> <ul style="list-style-type: none">a) the accessibility of the development;b) the type, mix and use of development;c) the availability of and opportunities for public transport;d) local car ownership levels; ande) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles.”		
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	<p>For example, terrace houses should still have parking the design needs to reflect this and therefore parking courts could be used.</p> <p>Have the Highways Authority been consulted in relation to this?</p> <p>Figure for housing number and size of site should be amended to reflect the changes that have been made to the allocation following discussion with the Parish and DM officers. This can be discussed further during the preparation of the Submission Version Document.</p>		
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	Map 9 is labelled shopping need a clear map to identify the limits to development/settlement boundary. Need a large insert map, at least A3 size.		
Paragraph 6.18, page 59	Map 9 does not show the settlement boundary, this is contained on map 2. Please see comments in relation to Map 2.	Regulation 14 comment remains	The proposed housing allocation shown on Map 10 matches the application site, but the areas of housebuilding are to be retained within the newly defined settlement boundary (paragraph 6.18).

<p>Policy M17</p>	<p><u>Policy M17</u>: The settlement boundary is not demarcated on Map 9 it is on Map 2.</p> <p>Should this policy be called Housing development? It is suggested the word infill is removed as it covers more than infill development</p> <p>Criteria 3), Criteria 5) and Criteria 6): In the recent Burbage Examiner's Report it was recommended that where the NDP makes reference to adopted Borough Council Local Plan policies these should remove as they repeat policy. This recommendation was agreed and taken forward. The Borough Council believes that criteria 1 of policy M1 is unnecessary as it repeats</p>	<p>The main settlement boundary map is map 2 of the Neighbourhood Plan, should this policy refer to this map rather than Map 10 which shows the settlement boundary and allocation.</p> <p>Title has been amended.</p> <p>Regulation 14 comments remain in relation to Criteria 3), Criteria 5) and Criteria 6).</p> <p>Criteria 4 has been updated</p>	<p>The settlement boundary is shown on maps 2, 10 and the Policies Maps. The boundary is identical on each.</p> <p>Policy M17 does not duplicate Site Allocations and Development Management Policies DPD policies, but instead provides helpful cross-referencing.</p>
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	<p>existing policy and does not provide any additional detail. If the Group would like to keep a reference to DM5, DM14 and DM15, this could be included in the supporting text as an alternative.</p> <p>Criteria 4) This criteria is incomplete as it refers to Policy ? There isn't a SADMP policy to accord with, so it needs to be one within the Markfield NDP. Should it be Policy M19?</p>		
<p>Policy M18 Paragraphs 6.21-6.22</p>	<p>Should say reflect the most up to date housing needs rather than give set figures as this becomes out of date quickly. Also, smaller family homes are not defined.</p>	<p>Regulation 14 comments remain.</p> <p>Paragraphs 6.21-6.22 – these paragraphs still refer to the 2017 HEDNA, although the policy does note that the most recent data should be used if available. There is more up to date information</p>	<p>Agreed</p>

		<p>available in the 2019 Housing Needs Study - page 108 contains the updated table. It is suggested the reference to the 2017 HEDNA is replaced by a reference to the Housing Needs Study and the table updated to that in the study. The supporting text 6.21 and 6.22 should be amended.</p>	
<p>Policy M19</p>	<p><u>Policy 19</u> Criteria 2) incorrect reference to map, a better plan is required to support this policy.</p> <p>Criteria 3) the buildings on site aren't of high quality and we don't want new buildings to reflect the existing, a more modern design would help enhance the character of this site. Recommend that this is changed this should be changes to be in accordance with the design policy and SPD.</p>	<p>Criteria 2) amended, no further comment</p> <p>Criteria 3) of the pre-submission version has been deleted no further comment</p> <p>Criteria 4 (formerly 5 in pre-submission version), regulation 14 comment remains: This should be re-worded to read additional access should be avoided</p> <p>Criteria 6) of the pre-submission version has been deleted no further comment</p>	<p>Criterion 4 is sufficiently clear.</p>

	<p>Point 5 – This should be reworded to read additional access should be avoided</p> <p>Point 6 – This is not justified as a landscaping scheme would not necessarily be needed unless a redevelopment of the site is proposed. Suggest change to landscaping on site should provide an improvement in biodiversity....</p>		
<p>Paragraph 7.11</p>	<p><u>Paragraph 7.7</u> The Borough Council published an Employment Land and Premises Study in 2020 and this paragraph should be updated to reflect this change.</p>	<p>This has been amended no further comment</p>	

Policy M21	<p>Incorrect map referenced in policy; better quality map required.</p> <p>Use classes have changed this is Class E and there are a lot more things you can do with Permitted Development</p> <p>No reference to Policy DM19 and DM20 – this is a stronger policy, don't want to weaken the position.</p>	<p>Only B1 are now included under Class E, so the references to B2 and B8 in the policy are fine. It may be worth the group exploring whether there are any planning conditions attached to the PP for the existing units formerly classed as B1 (offices referred to in supporting text) which restricts other uses for anything other than employment, which would mean proposals for other Class E uses would require PP.</p>	<p>There is no 'tick box' list of evidence required for neighbourhood planning. The Qualifying Body believes that it has provided proportionate, robust evidence to support the choices made and the approach taken. It does not believe that the additional information requested is 'proportionate' and, in any event, the Local Planning Authority has access to this information and can supply this data itself especially given its duties under paragraph 3 of Schedule 4B to the Town and Country Planning Act 1990 (as amended).</p>
Map 12	<p>This map has been stretched and lost clarity and scale. The legend is incomplete as it falls off the page. The map should be inserted and not stretched so that it is not distorted.</p>	<p>This has been amended no further comment</p>	

Figure 5	<p>This map has lost its clarity, it has no scale or copyright. It is not possible to read the legend. All other maps are referred to as such, whereas this map is referred to as a figure. All maps should be consistently referenced, this was highlighted through the recent Burbage Examination Report. It is recommended that the group repopulate the mapping data on Parish Online so that users of the document can interpret the map effectively.</p>	Regulation 14 comments remain	Representation unclear.
Chapter 9	<p>It is not clear what the purpose of this chapter is. Is this a policy for highways it is not clear? A lot of these are aspirations and shouldn't be a policy.</p>	This chapter has been deleted, no further comment	
Policies Map	<p>These maps have information missing as they do not fit on the page. It is recommended</p>	Comment remains applicable, although these maps have been greatly improved it would be better if	These maps are at A3 size.

	that the maps are inserted onto an A3 page in landscape so all information can be viewed.	they could be shown on an A3 map to allow for easier use.	
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.	<p><u>Site selection</u></p> <p>The Site Selection Framework Assessment have been made available and are on the Markfield Neighbourhood Plan Website, so this comment no longer applies.</p> <p><u>Local Green Space designation</u></p> <p>As per comments on Policy M6</p> <p>It appears that Appendix 1 is the sole justification for the LGS designations and further documentation has not been provided. The Borough Council has previously advised the NDP Group what type of evidence should be used for these designations and</p>	The Markfield Neighbourhood Plan Evidence base can be viewed at: https://npsg.markfieldpc.org.uk/supporting-evidence/

	<p>From the information provided in the Plan and the Neighbourhood Plan website there appears to be gap in evidence which underpins this Neighbourhood Plan. The LPA have raised this outside of the formal consultation process in regard to certain elements of this Plan. It may be that evidence has been produced but not been made publicly available through this consultation. Either way, all evidence produced to support a Neighbourhood Plan must be made available to view, during this Covid-19 Lockdown 2.0 period it is acceptable that this is made available online. The Neighbourhood Plan Group should make the evidence base a priority as part of the preparation of the Submission Document.</p>	<p>provided examples so that the Group can clearly demonstrate the spaces warrant Local Green Space protection. The LGS do not meet all the criteria set out in Appendix 1 but have still been selected as LGS, there is no clear justification for the allocation.</p> <p>The Borough Council's previous comments remain in relation to the evidence behind the allocation of the LGS.</p> <p>Except for the Two Upper Greens (LGS I) all of the LGS are identified as Open Space, Sports and Recreational Facilities in the Site Allocations and Development Management Policies DPD (2016) and are protected by policy DM8 within this DPD. If it cannot be demonstrated that these open spaces meet the NPPF LGS test they are still protected.</p> <p><u>Housing Need Assessment</u></p> <p>This document is available on the Markfield Neighbourhood Plan Website</p>	
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	<p>Outlined below is several evidence base documents that the LPA have identified are missing from this Regulation 14 consultation:</p> <p><u>Site Selection</u></p> <p>Para 6.13 on page 57 refers to a site selection process using clearly defined sustainability criteria, however these assessments have not been made publicly available. These assessments are a fundamental element of the Plan and respondents should be provided with the opportunity to comment on the site selection process.</p> <p><u>Local Green Space Designation</u></p>	<p><u>Non-designated Heritage Assets</u></p> <p>Further information has been provided on the Markfield Neighbourhood Plan Website</p> <p><u>Renewable Energy</u></p> <p>Regulation 14 comment remains</p> <p><u>Local Impact Threshold</u></p> <p>Regulation 14 comment remains</p>	
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	<p>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:</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; andc) local in character and is not an extensive tract of land’.		
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	<p>From the information provided it is not clear how the LGS have been identified, scored and selected or how the LGS relate to these four 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 have clear robust evidence to support their selection and designation.</p> <p>Locality provide further information in regards to an assessment here.</p> <p><u>Housing Need Assessment</u></p>		
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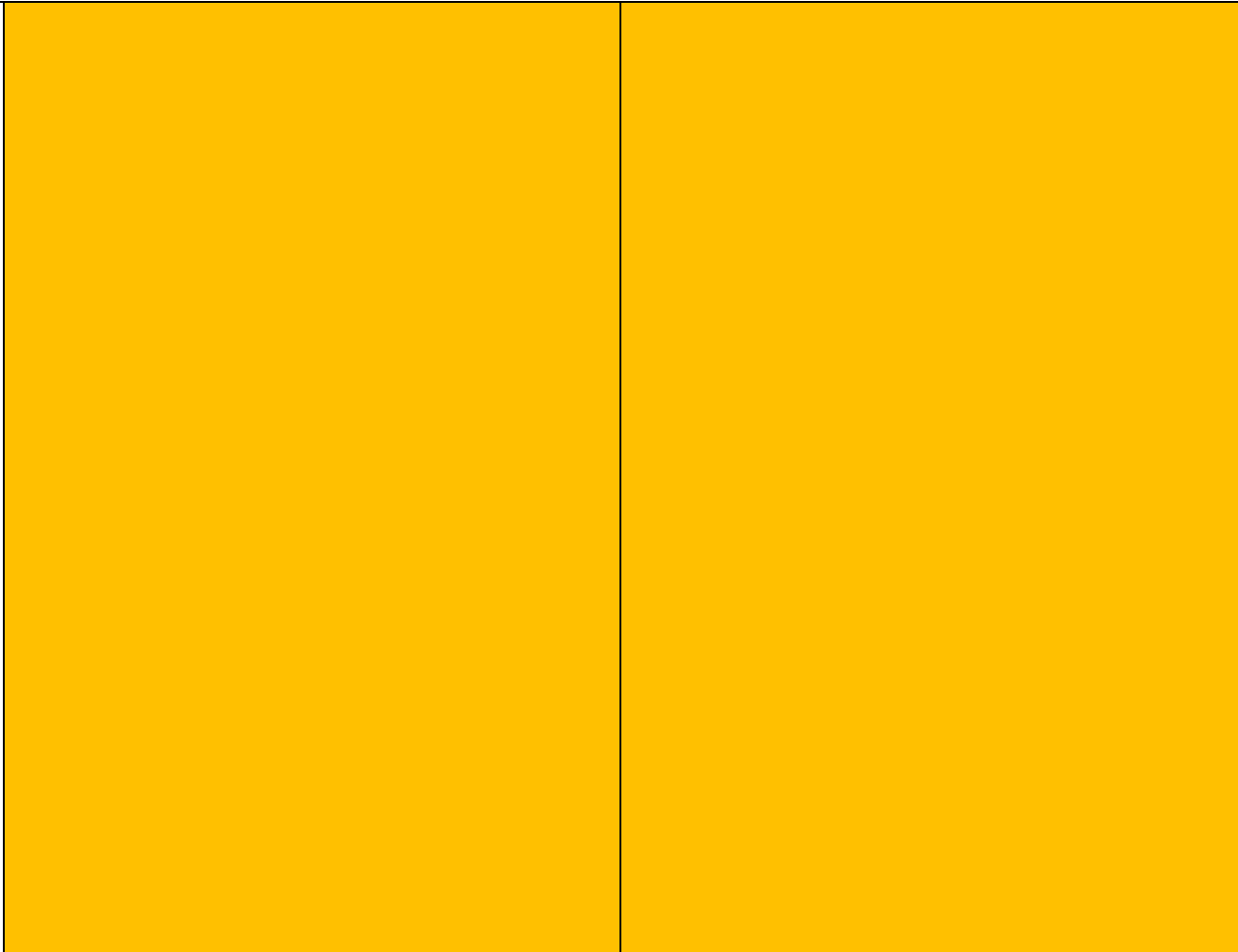
	<p>The Borough Council were provided with a copy of the Markfield Housing Needs Assessment in March 2020 as part of the preparation of the Plan, however this document has not been made publicly available as part of this consultation process. This is a key part of the Plan and should be made available for comment as part of the Regulation 14 consultation.</p> <p><u>Non-designated heritage assets</u></p> <p>The justification for these assets is not included in the Plan, is it contained within supplementary evidence base documents? Please see comments on M9.</p> <p><u>Renewable Energy</u></p>		
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	<p>There is a blanket restriction of wind turbines in policy M8, is this supported by evidence as to why the Markfield Designated Area is not an appropriate location for wind installations.</p> <p><u>Local Impact Assessment Threshold</u></p> <p>Policy M13 introduces the requirement for an impact assessment to be carried out if a proposal exceeds 200m² of retail space outside of a neighbourhood/local centre. This is based on a proportionate approach against Policy DM21 of the SADMPPD. This proportionate approach is contrary to paragraph 89 of the NPPF allows for localised thresholds to be set and the NPPG provides further guidance on this. The NPPG</p>		
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states: *'In setting a locally appropriate threshold it will be important to consider the:*

- *scale of proposals relative to town centres*
- *the existing viability and vitality of town centres*
- *cumulative effects of recent developments*
- *whether local town centres are vulnerable*
- *likely effects of development on any town centre strategy*
- *impact on any other planned investment'*

Evidence which takes account of the NPPG criteria should be provided.



Mapping	<p>There appears to be an issue with the way in which maps have been inserted into the document which has resulted in the images losing clarity or being partially missing. Maps have been individually commented on in the detailed comments sections. During the examination into the Burbage Neighbourhood Plan the Examiner raised concerns in relation to the quality of the mapping and made several modifications to improve their quality before the document could proceed to referendum. If the Group compare the Submission and Referendum Versions of the Burbage Neighbourhood Plan you will see a stark difference in the quality and usability of the maps. The recommendations set out in these comments seek to</p>	<p>The Group have successfully improved the majority of maps; however the Borough Council still have some concerns over certain maps and these comments have been raised in the comments above.</p>	<p>See above responses.</p>
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<p>overcome the same issues Burbage NDP Group had during the examination process before it gets to that stage to make the examination process smoother.</p> <p>When maps are inserted into a document it is generally best if they are inserted as a JPEG image and they should not be stretched as this can lose the scale and proportion.</p> <p>All maps must contain the correct copyright message.</p> <p>The map titles and numbers should be checked against the references within the document as quite often these are incorrectly referenced.</p> <p>It may be beneficial to insert some of your maps on A3</p>		
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	<p>pages or have them as a full A4 map.</p> <p>Consider what base map and scale you are using for the purpose of the map, so that the geographic information you are displaying can be easily interpreted by the users of the document.</p>		
Community proposals	<p>In the preparation of neighbourhood plans several of our Neighbourhood Plan Groups have highlighted non-planning issues or the need for community projects. There are a few 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</p>	Comment remains	

	<p>section. The Group may wish to see if there are any actions arising from the plan preparation which you wish to have more prominence like Burbage and Sheepy.</p>		
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