

# Hinckley & Bosworth Borough Council Consultation Response to the Markfield Neighbourhood Plan Submission

24<sup>th</sup> March 2021



Hinckley & Bosworth  
Borough Council



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## 1. Background to Markfield Neighbourhood Plan

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

- (a). having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan).
- (d). the making of the order (or neighbourhood plan) contributes to the achievement of sustainable development.
- (e). the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).
- (f). the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.
- (g). prescribed conditions are met in relation to the Order (or plan) and prescribed matters have been complied with in connection with the proposal for the order (or neighbourhood plan).

In March 2017 Markfield Parish Council submitted an application to designate a neighbourhood area in order to prepare a Neighbourhood Development Plan to cover the whole area of Markfield Parish. A six-week public consultation on whether this was an appropriate area to designate for the purpose of undertaking a Neighbourhood Development Plan ended on 14 April 2017. Following the consultation, the Borough Council formally designated Markfield Neighbourhood Area for the purpose of producing a Neighbourhood Development Plan.

Following years of evidence gathering and preparing the plan, the Pre-Submission version of the Markfield Neighbourhood Plan went out for consultation between Monday 7 September and Friday 13 November 2020. Following this consultation, the feedback provided to the Neighbourhood Plan Group was reviewed and considered alongside feedback from statutory stakeholders. Consultation results from the pre-submission stage were then used to inform the draft plan for final submission. HBBC submitted a response to the Regulation 14 consultation, in which it aimed to provide advice as to where policies, sections or paragraphs within the submission NDP may be improved with a view of ensuring conformity with the basic conditions outlined above; this can be seen in Section 3.

HBBC began the Regulation 16 Publicity consultation stage on **Wednesday, 10 February 2021. The consultation ended at 5pm Wednesday, 24 March 2021.** HBBC invited representations from all those previously consulted through the Pre-submission consultation stage (Regulation 14) as prescribed in the Markfield Neighbourhood Plan Consultation Statement, those on the Hinckley and Bosworth Local Plan Consultation Database and any others prescribed by regulation.

Following the Regulation 16 Draft Plan consultation, HBBC will make all representations received available to the independent examiner.

## **2. Hinckley and Bosworth Borough Council's response to Markfield Neighbourhood Plan submission documents**

The submission of the Markfield Neighbourhood Plan Proposal to Hinckley and Bosworth Borough Council (HBBC) on 1 February 2021 and included the following items.

- a) the Consultation Statement which:
  - i. contains details of the persons and bodies who were consulted about the proposed neighbourhood development plan;
  - ii. explains how they were consulted;
  - iii. summarises the main issues and concerns raised by the persons consulted; and
  - iv. describes how these issues and concerns have been considered and, where relevant, addressed in the proposed neighbourhood development plan.
- b) the Markfield Neighbourhood Plan;
- c) the Basic Conditions Statement which explains how the proposed neighbourhood development plan meets the requirements of paragraph 8 of Schedule 4B to the 1990 Act and The Regulations. The Basic Conditions Statement also contains:
  - a. a map which identifies the area to which the proposed neighbourhood development plan relates;
  - b. a statement of reasons for the determination that under regulation 9(1) of those Environmental Assessment of Plans and Programmes Regulations 2004(a) the plan proposal is unlikely to have significant environmental effects (and, accordingly, does not require an environmental assessment); and
  - c. an Equalities Impact Assessment of the proposed neighbourhood development plan; and
- d) a copy of the Draft Minutes of the Markfield Parish Council meeting held on 30 January 2021 confirming approval of the draft Neighbourhood Plan and accompanying documents.

The above documents are considered to adequately fulfil the submission requirements under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012 and Schedule 4b of the Town and Country Planning Act 1990, as inserted into Schedule 10 of the Localism Act 2011.

Therefore, HBBC is satisfied that the qualifying body of Markfield Parish Council had satisfied the relevant regulatory requirements to advance the Markfield Neighbourhood Plan to the Publicity and Consultation Stage (Regulation 16) and subsequent submission of the Neighbourhood Plan proposal for examination.

In addition, HBBC is satisfied that the Markfield Neighbourhood Plan proposal does not include any development which would be defined as 'excluded development' as prescribed by Schedule 9, Section 61k of the Localism Act.

### 3. Hinckley & Bosworth Borough Council’s comments on the Draft Plan

At this ‘draft plan’ stage of the neighbourhood plan process the Local Planning Authority is not required to consider whether the draft plan meets the basic conditions. It is only after the independent examination has taken place and after the examiner’s report has been received that the local planning authority comes to its formal view on whether the draft neighbourhood plan meets the basic conditions.

The local planning authority should provide constructive comments on an emerging plan before it is submitted.

In November 2020, during the pre-submission consultation stage, Hinckley & Bosworth Borough Council (HBBC) provided constructive comments on the draft plan. Comments were provided from Planning Policy, Development Management, the Senior Planning Officer for Conservation, and the Housing Strategy and Enabling Officer.

Table 1 shows HBBC’s Pre-Submission consultation comments provided in November 2020 and a response to the submission consultation, March 2021. The Borough Council’s Submission comments are colour coded to show whether changes have been made or whether the Borough Council has outstanding concerns.

	Amended and no further comments
	Amended to a certain extent – still requires some further modification.
	No changes made following previous comments – HBBC recommends significant modification.
Silent	No further comments or N/A

**Table 1: Hinckley and Bosworth Borough Council (HBBC) responses to the Regulation 14, Draft Plan and Regulation 16 Markfield Neighbourhood Plan**

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
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?
Policy M1	<p><u>Policy M1:</u> In the recent <a href="#">Burbage Examiner's Report</a> 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 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  Amend criteria 3 to – Development and diversification of agricultural and other land-based rural businesses  Amend criteria 4 to – Brownfield Development  Amend criteria 6 to – Renewable energy</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>

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.

The policy states that *'The following types of development may be considered sustainable'*. The word 'may' open the policy up to challenge and misinterpretation; it is recommended the wording is amended from 'may' to 'will'.

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: *'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'*. A public utility provider can be defined as: Businesses that provide the public with 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 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>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 examiner in recent examinations (See the <a href="#">Sheepy Neighbourhood Plan Examiner's Report</a>), 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 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 <a href="#">Burbage Examiner's Report</a>.</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 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>

Figure 2, page 13	<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 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.	No changes made, agree with previous comment
Figure 3, page 14	<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.	No changes made, agree with previous comment
Policy M2 page 15-16	<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 <a href="#">Burbage Neighbourhood Plan Referendum Version</a>)</p> <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>	<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. 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>



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 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 within the neighbourhood areas first and then if they can't achieve that then it needs to be within the National Forest Area.</p>	The policy relating to the National Forest has been removed from the Submission Plan
Paragraphs 4.18-4.22 page 19-20	<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 <a href="#">here</a>.</p>	Plan has been updated to reflect the current Green Infrastructure Study (2020)

<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>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>The policy has been updated and amended to read less like aims and objectives.</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 <a href="#">Burbage Neighbourhood Plan Referendum</a> 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.</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>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 <a href="#">Burbage Neighbourhood Plan Referendum Version</a> 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 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>Amended, no further comments.</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>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>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>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>
Pages 24-26 Policy M6 Appendix 1	<p><u>Pages 26-27, Para 4.37-4.38</u> Policy M6 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>‘The Local Green Space designation should only be used where the green space is:</p> <ul style="list-style-type: none"> <li>a) in reasonably close proximity to the community it serves;</li> <li>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</li> <li>c) local in character and is not an extensive tract of land’.</li> </ul>	<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 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 I) all of the LGS are identified as Open Space, Sports and Recreational Facilities in the Site Allocations and</p>

	<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>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 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>	<p>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>
<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</p>	<p>Regulation 14 comments remain relevant</p>

	<p>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 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>	
M8	It is recommended that this policy is expanded to include all new residential developments. This is something which is contained within <a href="#">The Good Design Guide SPD</a> . 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.
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?
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.
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 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 or historic”. More detail on these categories of interest is provided in the Planning Practice Guide (Paragraph 006 Reference ID: 18a-006-20190723): <a href="https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment">https://www.gov.uk/guidance/conserving-and-enhancing-the-historic-environment</a>. This is further broken down within the Borough Council’s selection criteria for identifying heritage assets: <a href="https://www.hinckley-bosworth.gov.uk/downloads/file/3571/suggested_selection_criteria">https://www.hinckley-bosworth.gov.uk/downloads/file/3571/suggested_selection_criteria</a></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</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>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 or 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 <a href="#">here</a>. This is further broken down within the Borough Council’s selection criteria for identifying local heritage assets which is available to view <a href="#">here</a>.</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>

	<p>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> <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>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>
Policy M10	<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>
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>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>It is recommended that the NDP could just include in the text for the purposes of DM25 these following site are applicable ...</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 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 re-worded to read additional access should be avoided</p> <p>Point 4 – 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>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>Point 2 (Submission Version) should be slightly re-worded to: <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>
Map 9, page 46	<p><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.</p>	<p>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.</p>
Para 5.18 Policy M13	<p>Policy M13 introduces the requirement for an impact assessment to be carried out if a proposal exceeds 200m<sup>2</sup> 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</p>	<p>The threshold size for an impact assessment has been amended from 200m<sup>2</sup> in the Pre-Submission Version of the NDP to 500m<sup>2</sup> in the Submission Version. There is no</p>

<p>localised thresholds to be set and the NPPG provides further guidance on this. The NPPG states: <i>'In setting a locally appropriate threshold it will be important to consider the:</i></p> <ul style="list-style-type: none"> <li>• <i>scale of proposals relative to town centres</i></li> <li>• <i>the existing viability and vitality of town centres</i></li> <li>• <i>cumulative effects of recent developments</i></li> <li>• <i>whether local town centres are vulnerable</i></li> <li>• <i>likely effects of development on any town centre strategy</i></li> <li>• <i>impact on any other planned investment'</i></li> </ul> <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 underpin the 200m2 threshold so that the NPPG criteria are considered and the figure can be defended.</p> <p>The LPA undertook a <a href="#">Town and District Centre Study</a> 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, 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 'neighbourhood centres' should be removed from the policy as their designation is</p>	<p>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 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 Uses<sup>2</sup> 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 Uses<sup>2</sup> 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><i>Planning applications for uses other than Commercial, Business and Service Uses<sup>2</sup> will not be supported unless it to occupy a premises that has remained vacant for a period of at least six months.</i></p>
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	<p>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>There is an * but then this isn't explained anywhere</p>	<p><i>A sequential test will be applied to planning applications for Commercial, Business and Service Uses<sup>2</sup> 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 Uses<sup>2</sup> 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 500m<sup>2</sup> retail floor space. This should include 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>
<p>Infrastructure Chapter</p> <p>Policy M14</p>	<p>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 available, but it does not state what improvements have been identified, for example want</p>	<p>Regulation 14 comments remain relevant</p>

improvements have been identified for Copt Oak Memorial Hall? Are these related to capacity and development pressures?

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.

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.

I would suggest the group considers preparing an 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.

	<p>Regarding Policy M14 infrastructure - as discussed above, the policy lists existing 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> <p>The <a href="#">infrastructure Capacity Study Baseline Assessment</a> may just also provide them with a bit of context regarding healthcare, education and highways. See Section 5.2.12.</p>	
Paragraph 6.3, page 55	<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>
Paragraph 6.5, page 55	<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</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>

	<p>accounts for 3.9% of the total borough population. Based on this share Markfield would 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 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 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</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 neighbourhood plan groups</p>

	<p>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 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>	<p>have a greater say in the direction of development if a larger housing need is determined.</p>
<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 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>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 <a href="#">Planning Committee</a> on the 30<sup>th</sup> 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</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 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> <p>Paragraph 105 of the NPPF (2018) states:      "If setting local parking standards for residential and non-residential development, policies should take into account:      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; and      e) the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles."</p> <p>For example, terrace houses should still have parking the design needs to reflect this and therefore parking courts could be used.</p>	<p>Examination. The proposal is for 283 dwellings and the built development falls within the settlement boundary 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>
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	<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> <p>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.</p>	
<p>Paragraph 6.18, page 59</p>	<p>Map 9 does not show the settlement boundary, this is contained on map 2. Please see comments in relation to Map 2.</p>	<p>Regulation 14 comment remains</p>
<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 <a href="#">Burbage Examiner's Report</a> 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 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>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>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 available in the <u>2019 Housing Needs Study</u> - 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>

Policy M19	<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>Point 5 – This should be re-worded 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>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>
Paragraph 7.11	<p><u>Paragraph 7.7</u> The Borough Council published an <a href="#">Employment Land and Premises Study</a> 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>
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	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.	Regulation 14 comments remain
Chapter 9	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.	This chapter has been deleted, no further comment
Policies Map	These maps have information missing as they do not fit on the page. It is recommended that the maps are inserted onto an A3 page in landscape so all information can be viewed.	Comment remains applicable, although these maps have been greatly improved it would be better if they could be shown on an A3 map to allow for easier use.
Evidence Base	<p>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> <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</p>	<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 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</p>

<p>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>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>  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>  There is no evidence of an assessment of the spaces identified as Local Green Space. LGS designations need to be justified against the criteria set out in paragraph 100 of the NPPF:  ‘The Local Green Space designation should only be used where the green space is:</p> <ul style="list-style-type: none"> <li>a) in reasonably close proximity to the community it serves;</li> <li>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</li> <li>c) local in character and is not an extensive tract of land’.</li> </ul> <p>From the information provided it is not clear how the LGS have been identified, scored and selected or how the LGS</p>	<p>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>  This document is available on the Markfield Neighbourhood Plan Website</p> <p><u>Non-designated Heritage Assets</u>  Further information has been provided on the Markfield Neighbourhood Plan Website</p> <p><u>Renewable Energy</u>  Regulation 14 comment remains</p> <p><u>Local Impact Threshold</u>  Regulation 14 comment remains</p>
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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.

Locality provide further information in regards to an assessment [here](#).

#### Housing Need Assessment

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.

#### Non-designated heritage assets

The justification for these assets is not included in the Plan, is it contained within supplementary evidence base documents? Please see comments on M9.

#### Renewable Energy

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.

#### Local Impact Assessment Threshold

Policy M13 introduces the requirement for an impact assessment to be carried out if a proposal exceeds 200m<sup>2</sup> of

	<p>retail space outside of a neighbourhood/local centre. This is based on a proportionate approach against Policy DM21 of the SADMPDPD. 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 states: <i>'In setting a locally appropriate threshold it will be important to consider the:</i></p> <ul style="list-style-type: none"> <li>• <i>scale of proposals relative to town centres</i></li> <li>• <i>the existing viability and vitality of town centres</i></li> <li>• <i>cumulative effects of recent developments</i></li> <li>• <i>whether local town centres are vulnerable</i></li> <li>• <i>likely effects of development on any town centre strategy</i></li> <li>• <i>impact on any other planned investment'</i></li> </ul> <p>Evidence which takes account of the NPPG criteria should be provided.</p>	
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 overcome the same issues Burbage NDP Group had during the examination process</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>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 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 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>	Comment remains



#### 4. Markfield NDP vs NPPF Compliance Table

Table 4 sets out how Hinckley & Bosworth Borough Council (HBBC) considers that the Markfield Neighbourhood Plan meets the requirements of Basic Condition (a) “having regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan)”.

**Table 2: Regard to National Policies and Guidance**

NDP Policy	Most relevant section of the NPPF (2019)	HBBC Submission Representation- Regard?
Policy M1: Countryside	Paragraph 77 and 78 (Rural Housing) Paragraph 170	The policy has regard to the NPPF in so far as it considers the intrinsic character and beauty of the countryside and setting out the types of development that could be acceptable beyond the settlement boundary.
Policy M2: Landscape	Paragraphs 20, 127 and 170	The policy has appropriate regard and considered consistent with the NPPF.
Policy M3: Green Infrastructure	Paragraphs 91, 171 and 181	The policy has appropriate regard and considered consistent with the NPPF.
Policy M4: Ecology and Biodiversity	Paragraphs 170, 171, and 174	Paragraph 174 states that plans should: ‘Identify, map and safeguard components of local wildlife rich habitats and wider ecological networks’. The NDP is consistent with this.
Policy M5: Trees	Paragraph 170 and 175	Policy M5 is consistent with the NPPF
Policy M6: Local Green Space	Paragraphs 99, 100 and 101	Para 99 states ‘The designation of land as Local Green Space through ... neighbourhood plans allows communities to identify and protect green areas of particular importance to them’. Markfield’s LGS policy seeks to designate a number of local green spaces and each space has been assessed against criteria set out in Appendix 1. These criteria reflect criteria b) of paragraph 100 but the allocations are not assessed (or the evidence has not been made available) against criteria a) or c).  In addition, the majority of the LGS designations are already designated as open space in the Borough Council’s Site Allocations and Development Management Policies DPD.  The policy is currently considered not be in general conformity due to the assessment of sites but could be amended to be in conformity.
Policy M7 Renewable Energy	Paragraphs 148, 151 and 152	Policy M7 does not have appropriate regard to the NPPF.  Paragraph 151. To help increase the use and supply of renewable and low carbon energy and heat, plans should: a) provide a positive strategy for energy from these sources, that maximises the potential for suitable development, while ensuring that adverse impacts are addressed satisfactorily (including cumulative landscape and visual impacts
Policy M8: Electric Vehicle Chargepoints	Paragraphs 108,110,	Policy M8 is consistent with the NPPF
Policy M9: Non-designated Heritage Assets	Chapter 16: Conserving and Enhancing the Historic Environment.  Paragraph 185. Paragraphs 189-192.	Para 185 of the NPPF states: “Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, 9including heritage assets most at risk through neglect, decay or other threats. This strategy should take into account... c) the desirability of new development making a positive contribution to local character and distinctiveness...”. Therefore, the policy is largely considered in general conformity with NPPF policies  The plan has appropriate regard to the NPPF in this regard, as the plan seeks to “preserve and enhance” and addresses the benefits coming from a development.

NDP Policy	Most relevant section of the NPPF (2019)	HBBC Submission Representation- Regard?
Policy M10: Design	Section 12. Paragraphs 124, 125, 126, 129, and 130	Section 12 Achieving well-designed places,' (Section 12) which emphasises that: ' <i>the creation of high-quality buildings and places is fundamental to what the planning and development process should achieve.</i> '  Therefore, the policy is largely considered in general conformity with NPPF policies
Policy M11: Community Services and Facilities	Paragraph 83 and paragraph 92.	Para 83 states "Planning policies should enable: ... d) the retention and development of accessible local services and community facilities, such as local shops, meeting places, sports venues, open space, cultural buildings, public houses and places of worship." Para 92 discusses similar aspirations for providing facilities and services to the community.  Policy M11 supports the retention of community facilities, and therefore the policy is largely considered in general conformity with NPPF policies
Policy M12: Markfield Institute of Higher Education	Paragraph 94	The NPPF seeks development which achieves healthy, inclusive and safe places and ensure a sufficient choice of school places are available to meet the needs of existing and new communities. Policy M12 supports such development and provides criteria against which these proposals will be assessed. The policy is in general conformity with the NPPF.
Policy M13: Local and Neighbourhood Centres	Paragraph 85 and 89	Paragraph 89 allows for locally set floorspace thresholds which require proposals to carry out an impact assessment, however the threshold size for an impact assessment has been amended from 200m <sup>2</sup> in the Pre-Submission Version of the NDP to 500m <sup>2</sup> in the Submission Version. There is no indication why this figure has changed and the evidence behind the figure.
M14: Infrastructure	Paragraphs 8, 28, 72, and 81	The NPPF states that Non-strategic policies should be used by local planning authorities and communities to set out more detailed policies for specific areas, neighbourhoods or types of development. This can include the provision of infrastructure and community facilities at a local level. The policy is in general conformity with the NPPF.
M15: Housing provision	Paragraphs 15, 60, 66	Paragraph 60 of the NPPF refers to 'the minimum number of homes needed'. The housing figure in Policy M15 should be expressed as a minimum to be consistent with the NPPF.
M16: Housing allocation- Land south of London Road	Silent	Silent
Policy M17: Windfall Housing Development	Paragraph 68.c (Identifying Land for Homes)	The policy supports the development of windfall sites within the settlement boundary or on brownfield sites, therefore the policy is largely considered in general conformity with NPPF policies.
M18: Housing Mix	Section 5 - Paragraph 59 and 61	The NPPF requires that plans provide for a mix of housing to cater for different groups and identify the size, type, and tenure of housing required. The policy is largely considered in general conformity with NPPF policies.
M19: Markfield Court Retirement Village and Woodrowe House	Section 5 – Paragraph 59	The NPPF requires that plans provide for a mix of housing to cater for different groups it sets out that a 'sufficient amount and variety of land can come forward where it is needed, that the needs of groups with specific housing requirements are addressed and that land with permission is developed without unnecessary delay. and identify the size, type, and tenure of housing required'. The policy is largely considered in general conformity with NPPF policies.
M20: Affordable Housing	Section 5 - Paragraph 59, 61, 62, 63 and 64	The policy has appropriate regard to the NPPF
M21: Markfield Industrial Estate	Paragraph 80	The policy has appropriate regard to the NPPF

NDP Policy	Most relevant section of the NPPF (2019)	HBBC Submission Representation- Regard?
M22: Brownfield Land	Paragraphs 117, 118 and 137	The policy has appropriate regard to the NPPF
M23: Business conversion of rural buildings		<p>Para 84 states: "Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."</p> <p>The policy has appropriate regard to the NPPF</p>
M24: Business Expansion	Paragraphs 80, 81, 82, 83 and 84.	<p>Para 84 states: "Planning policies and decisions should recognise that sites to meet local business and community needs in rural areas may have to be found adjacent to or beyond existing settlements, and in locations that are not well served by public transport. In these circumstances it will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport). The use of previously developed land, and sites that are physically well-related to existing settlements, should be encouraged where suitable opportunities exist."</p> <p>The policy has appropriate regard to the NPPF, all be it limits expansion to be small-scale</p>

## 5. Markfield NDP vs Local Plan Compliance Table

Table 4 sets out how Hinckley & Bosworth Borough Council (HBBC) consider the Markfield Neighbourhood Plan meets the requirements of Basic Condition (e) “the making of the order (or neighbourhood plan) is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).”

The Planning Policy Guidance (Paragraph: 074 Reference ID: 41-074-20140306) When considering whether a policy is in general conformity a qualifying body, independent examiner, or local planning authority, should consider the following:

- whether the neighbourhood plan policy or development proposal supports and upholds the general principle that the strategic policy is concerned with
- the degree, if any, of conflict between the draft neighbourhood plan policy or development proposal and the strategic policy
- whether the draft neighbourhood plan policy or development proposal provides an additional level of detail and/or a distinct local approach to that set out in the strategic policy without undermining that policy
- the rationale for the approach taken in the draft neighbourhood plan or Order and the evidence to justify that approach

	The policy is largely considered in general conformity with the strategic policies of the Local Plan
	The policy is currently considered not be in general conformity but could be amended to be in conformity with wording amendments and additions.
	Directly contradictory
Silent	Strategic policies of the Local Plan are silent

**Table 3: Conformity of the Markfield Neighbourhood Plan to the Hinckley & Bosworth Local Plan**

NDP POLICY	HBBC Regulation 16 Submission Comments March 2021	
	Relevant Site Allocations Policies	Relevant Core Strategy Policy/Spatial Objective
Policy M1: Countryside	DM4 – Safeguarding the Countryside and Settlement Separation DM14 – Replacement Dwellings in the Rural Area DM15 – Redundant Rural Buildings	Silent
Policy M2: Landscape	DM4 – Safeguarding the Countryside and Settlement Separation	Policy 8 – Key Rural Centres Relating to Leicester
Policy M3: Green Infrastructure	Silent	Policy 8 – Key Rural Centres Relating to Leicester Policy 20 – Green Infrastructure
Policy M4: Ecology and Biodiversity	DM6 – Enhancement of Biodiversity and Geological Interest	n/a
Policy M5: Trees	n/a	n/a
Policy M6: Local Green Space	Silent	Silent
Policy M7 Renewable Energy	DM2 - Delivering Renewable Energy and Low Carbon Development	Silent

NDP POLICY	HBBC Regulation 16 Submission Comments March 2021	
	Relevant Site Allocations Policies	Relevant Core Strategy Policy/Spatial Objective
	<i>See comments raised in relation to this policy</i>	
Policy M8: Electric Vehicle Chargepoints	Silent	Silent
Policy M9: Non-designated Heritage Assets	DM11 – Protecting and Enhancing the Historic Environment DM12 – Heritage Assets	Silent
Policy M10: Design	DM10 – Development and Design	Policy 16 – Housing Density, Mix and Design
Policy M11: Community Services and Facilities	DM25 – Community Facilities <i>See comments raised in relation to this policy</i>	Policy 8 – Key Rural Centres Relating to Leicester
Policy M12: Markfield Institute of Higher Education	Silent	Policy 8 – Key Rural Centres Relating to Leicester
Policy M13: Local and Neighbourhood Centres	DM22 – Vitalising District, Local and Neighbourhood Centres	Policy 7 – Key Rural Centres Policy 8 – Key Rural Centres Relating to Leicester
M14: Infrastructure	DM3 – Infrastructure and Delivery	Policy 8 – Key Rural Centres Relating to Leicester
M15: Housing provision	n/a	Policy 8 – Key Rural Centres Relating to Leicester
M16: Housing allocation- Land south of London Road	Silent	Silent
Policy M17: Windfall Housing Development	Silent	Silent
M18: Housing Mix	Silent	Policy 7 – Key Rural Centres Policy 16 – Housing Density, Mix and Design
M19: Markfield Court Retirement Village and Woodrowe House	Silent	Policy 7 – Key Rural Centres Policy 16 – Housing Density, Mix and Design
M20: Affordable Housing	Silent	Policy 7 – Key Rural Centres Policy 15 – Affordable Housing
M21: Markfield Industrial Estate	DM19 Existing Employment Sites <i>See comments raised in relation to this policy</i>	Policy 7 – Key Rural Centres Policy 8 – Key Rural Centres Relating to Leicester

NDP POLICY	HBBC Regulation 16 Submission Comments March 2021	
	Relevant Site Allocations Policies	Relevant Core Strategy Policy/Spatial Objective
M22: Brownfield Land	DM19 Existing Employment Sites DM20 – Provision of Employment Sites	Policy 7 – Key Rural Centres Policy 8 – Key Rural Centres Relating to Leicester
M23: Business conversion of rural buildings	DM5: Enabling Rural Worker Accommodation DM10: Development and Design DM15 Redundant Rural Buildings	Silent
M24: Business Expansion	DM20 – Provision of Employment Sites	Policy 7 – Key Rural Centres Policy 8 – Key Rural Centres Relating to Leicester

## **6. Hinckley and Bosworth Borough Council's response to the SEA Screening Decision**

Basic Conditions (f):

(f). the making of the order (or neighbourhood plan) does not breach, and is otherwise compatible with, EU obligations.

Points (f) above relates to certain obligations which plans must adhere to, primarily in relation to habitats and environmental impacts. Some plans require a Strategic Environmental Assessment and/or a Habitat Regulations Assessment (SEA/ HRA respectively).

Markfield has undertaken an SEA screening, in which it was determined a full SEA would not be required, as agreed by the three statutory bodies: Historic England, Natural England and The Environment Agency. Below is HBBC's decision statement, issued to the Qualifying Body on 27<sup>th</sup> August 2020.

The Borough Council subsequently received a consultation response from Historic England on 8th September 2020. An addendum was published which updates paragraph 6.1 of the SEA Screening Report to ensure the response submitted by Historic England has been considered and the SEA determination has been reviewed in light of this response.

The response by Historic England concluded that on the basis of the submitted information, no reasons relating to the historic environment were identified that would necessitate the preparation of an SEA. The conclusions set out in the Markfield SEA Screening Report (August 2020), SEA Determination Notice and HRA Determination notice remained appropriate.



**Hinckley & Bosworth  
Borough Council**

**Markfield Neighbourhood Plan  
The Environmental Assessment of Plans and Programmes Regulations 2004  
Screening Determination notice under Regulation 9(1)**

Regulation 9 of the above Regulations requires Hinckley and Bosworth Borough Council, on behalf of Markfield Parish Council (the “responsible authority”), to determine whether the Markfield Neighbourhood Plan is likely to have significant environmental effects.

Hinckley and Bosworth Borough Council, following consultation with the Environment Agency, Natural England and Historic England, has determined that the Markfield Neighbourhood Plan is unlikely to have significant environmental effects. It is therefore considered that a Strategic Environmental Assessment (SEA) is not required.

This notice fulfils the publicity requirements in accordance with Regulations 11(1) and 11(2). A copy of this screening opinion and the associated screening report will be available on the Council’s website or can be viewed at:

*Hinckley Hub*

*Rugby Road*

*Hinckley*

*Leicestershire*

*LE10 0FR*

Please note, at the time of issuing this Determination (August 2020), the Hinckley Hub is only open to visitors with pre-appointments and emergencies only due to the coronavirus pandemic. Please check the Borough Council’s [Website](#) or call (01455 238141) for the latest information regarding visiting the Hinckley Hub before you make your journey.



For further information, please email [planningpolicy@hinckley-bosworth.gov.uk](mailto:planningpolicy@hinckley-bosworth.gov.uk)

27th August 2020



**Hinckley & Bosworth  
Borough Council**

**Markfield Neighbourhood Plan Strategic Environmental Assessment (SEA) Screening  
Report – Addendum 17th September 2020**

**The Markfield SEA Screening Report<sup>1</sup> was published in August 2020. The draft screening report was subject to a five week consultation with the statutory consultees: Natural England, The Environment Agency and Historic England until the 26th August 2020.**

**The Borough Council received responses from Natural England and The Environment Agency who agreed with the conclusions of the report that the Markfield Neighbourhood Plan is not likely to result in significant environmental effects and accordingly does not require a Strategic Environmental Assessment or Habitats Regulations Assessment (HRA). Following the end of the consultation period the Borough Council published the SEA<sup>2</sup> and HRA<sup>3</sup> determination notices.**

**The Borough Council subsequently received a consultation response from Historic England on 8th September 2020. This addendum updates paragraph 6.1 of the SEA Screening Report to ensure the response submitted by Historic England has been considered and the SEA determination has been reviewed in light of this response.**

**The response by Historic England (included in Appendix 1) concluded that on the basis of the submitted information, no reasons relating to the historic environment were identified that would necessitate the preparation of an SEA. The conclusions set out in the Markfield SEA Screening Report (August 2020), SEA Determination Notice and HRA Determination notice remain appropriate.**

**1 Markfield Strategic Environmental Assessment Screening Report – August 2020  
2 Markfield Neighbourhood Plan The Environmental Assessment of Plans and Programmes Regulations 2004 Screening Determination notice under Regulation 9(1) – 27th August 2020  
3 Markfield Neighbourhood Plan Habitat Regulations Assessment Determination – 27th August 2020**



## Appendix 1 – Historic England Consultation Response to the Markfield SEA Screening Report

### Chris Colbourn

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**From:** Fletcher, Clive <Clive.Fletcher@HistoricEngland.org.uk>  
**Sent:** 08 September 2020 12:33  
**To:** Chris Colbourn  
**Cc:** Hendy, Bethany  
**Subject:** RE: Markfield Neighbourhood Plan: SEA Screening Opinion Request

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Mr Colbourn,

Thank you for your consultation. On the basis of the submitted information Historic England do not find that there are historic environment reasons that would necessitate the preparation of an SEA.

Best wishes,

Clive Fletcher, Principal Advisor and Lead Specialist, Historic Places  
Mobile phone: 07771502052

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[www.HistoricEngland.org.uk](http://www.HistoricEngland.org.uk)



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**From:** Chris Colbourn [mailto:Chris.Colbourn@hinckley-bosworth.gov.uk]  
**Sent:** 21 July 2020 12:31  
**To:** Midlands ePlanning  
**Subject:** Markfield Neighbourhood Plan: SEA Screening Opinion Request

THIS IS AN EXTERNAL EMAIL: do not click any links or open any attachments unless you trust the sender and were expecting the content to be sent to you

Dear Sir/Madam,

**The Environmental Assessment of Plans and Programmes Regulations 2004, Regulation 9 Screening**



Hinckley & Bosworth  
Borough Council

**Markfield Neighbourhood Plan**

**Habitat Regulations Assessment Determination**

Schedule 2 of the Neighbourhood Planning (General) Regulations 2012 makes provision in relation to the Habitats Directive. The Directive requires that any plan or project, likely to have a significant effect on a European site, must be subject to an appropriate assessment. To achieve this, paragraph 1 prescribes a basic condition that the making of a neighbourhood plan is not likely to have a significant effect on a European site or a European offshore marine site.

Habitat Regulations Assessment (HRA) screening is a requirement of the Conservation of Habitats and Species Regulations 2017. HRA considers the potential adverse impacts of plans and projects on designated Special Areas of Conservation (SACs), classified Special Protection Areas (SPAs) and listed Ramsar sites – collectively known as the Natura 2000 network.

It is the opinion of Hinckley & Bosworth Borough Council that a full Habitats Regulations Appropriate Assessment of the current Markfield Neighbourhood Plan is not required, as it is unlikely to have a significant effect on any designated sites. The justification for this is contained within the Markfield Neighbourhood Plan Strategic Environmental Assessment Screening Report (August 2020).

A copy of this screening opinion and the associated screening report will be available on the Council's website (Neighbourhood Planning webpage) or can be viewed at:

Hinckley Hub  
Rugby Road  
Hinckley  
Leicestershire  
LE10 0FR

Please note, at the time of issuing this Determination (August 2020), the Hinckley Hub is only open to visitors with pre-appointments and emergencies only due to the coronavirus pandemic. Please check the Borough Council's [Website](#) or call (01455 238141) for the latest information regarding visiting the Hinckley Hub before you make your journey.

For further information, please email [planningpolicy@hinckley-bosworth.gov.uk](mailto:planningpolicy@hinckley-bosworth.gov.uk)

[27<sup>th</sup> August 2020](#)