Hinckley & Bosworth Borough Council Consultation Response to the Stoke Golding Neighbourhood Plan Submission

22nd July 2021

Hinckley & Bosworth Borough Council

Stoke Golding Neighbourhood Plan - shaping the future of our village!

1. **Background to Stoke Golding Neighbourhood Plan**
2. **Hinckley & Bosworth Borough Council's response to Stoke Golding Neighbourhood Plan submission document**
3. **Hinckley & Bosworth Borough Council's comments on the Draft Plan**
4. **Stoke Golding NDP vs NPPF Compliance Table**
5. **Stoke Golding NDP vs Local Plan Compliance Table**
6. **Hinckley & Bosworth Borough Council's response to the SEA Screening Decision**

1. Background to Stoke Golding 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 April 2016 Stoke Golding Parish Council submitted an application to designate a neighbourhood area in order to prepare a Neighbourhood Development Plan to cover the whole area of Stoke Golding Parish plus an area within the parish of Higham on the Hill. 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 27th May 2016. Following the consultation on 15th June 2016, the Borough Council formally designated Stoke Golding 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 Stoke Golding Neighbourhood Plan went out for consultation from 14th December 2020 for a period of 8 weeks until 5th February 2021. 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 9th June 2021. The consultation ended 5pm 21st July 2021**.** HBBC invited representations from all those previously consulted through the Pre-submission consultation stage (Regulation 14) as prescribed in the Stoke Golding 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 Stoke Golding Neighbourhood Plan submission documents

The submission of the Stoke Golding Neighbourhood Plan Proposal to Hinckley and Bosworth Borough Council over April and May 2021 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 Stoke Golding 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:

   i. a map which identifies the area to which the proposed neighbourhood development plan relates;
   ii. 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 requires an environmental assessment; and a statement of the conclusions of the SEA produced independently by AECOM that the effects of implementing the neighbourhood plan would be predominantly positive and neutral, although recommendations were made concerning impacts on the historic environment which have been incorporated into the Submission Version of the Stoke Golding Neighbourhood Plan; and
   iii. an Equalities Impact Assessment of the proposed neighbourhood development plan; and

d) a copy of the Minutes of the Stoke Golding Parish Council meeting held on 7 April 2021 confirming approval for submission 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 Basic Conditions Statement) identifying the area to which the plan relates Act 1990, as inserted into Schedule 10 of the Localism Act 2011.

Hinckley and Bosworth Borough Council are satisfied that the qualifying body of Stoke Golding Parish Council has satisfied the relevant regulatory requirements to advance the Stoke Golding Neighbourhood Plan to the Publicity and Consultation Stage (Regulation 16) and subsequent submission of the Neighbourhood Plan proposal for examination.

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 January 2021, 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, the Economic Regeneration Officer 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 Stoke Golding Neighbourhood Plan

Submission 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
Map 1	Map 1. The colours of the Parish boundary and Neighbourhood Plan (NP) boundary are very similar. Consider changing to make the two boundaries more distinctive.	Map boundaries updated
Para 1.6	Paragraph 1.6. To be precise, the NP must be in "general conformity" with the Development Plan for the area, which is a sterner test than "have regard to" applicable to the NPPF and NPPG. Hyperlink goes to Schedule 9 of the Localism Act 2011 when the basic conditions are set out in Schedule 10 (8(2)).	Third sentence of paragraph 1.6 revised to accurately reflect that the NP must be in general conformity with the strategic policies of the development plan for the area. Hyperlink revised
Para 1.31	Paragraph 1.33. From the point of view of planning officers dealing with planning applications they will know that all the policies of a "made" NP have to be considered in decision making as the NP forms part of the development plan. As such, paragraph 1.33 is not strictly necessary for decision making. Also, in line with the Planning Acts, decisions can be made contrary to the development plan where material considerations indicate otherwise, and on all planning applications a planning balance has to be applied such that proposals can be contrary to some policies but the benefits of a scheme may outweigh the harm. HBBC suggests the paragraph is either deleted or caveated to recognise other material considerations and the planning	HBBC accepts reasoning that local community need to know that all relevant policies of the neighbourhood plan will be applied in planning application decision making.

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	balance. Replacing "…will be applied." With "…will be considered" would help.	
Vision. P11.	Concise easy to understand infographic of the SGNP vision.	Support noted.
Paras 4.11 – 4.12 housing requirement	Paragraphs 4.11 – 4.12. In terms of the Neighbourhood Plan's method of calculating Stoke Golding's housing requirement, there is a simple logic to extrapolating the 3 dwellings per annum of the Core Strategy as a minimum, and the Leicestershire Growth Plan (2018) has a very similar annual housing requirement for HBBC as the Core Strategy (2009). However, it is now necessary to calculate housing requirements in line with the "Standard Method" of the Ministry of Housing Communities and Local Government (MHCLG). As a first step, HBBC has used the Standard Method to calculate a borough wide housing need of 8,588 dwellings for the period 2020-39. HBBC have recommended an approach to setting a housing requirement for neighbourhood plans of apportioning this across the borough by population. So If this need is apportioned to parishes according to population based on the Mid-Year Estimates of 2017, Stoke Golding's housing need would be 144 dwellings for 2020-39. HBBC have also recommended that neighbourhood plans include an additional buffer to give flexibility to the plan. For example this would help if sites did not come forward for development as anticipated and/or if the local plan, once adopted, set a different housing requirement for the parish. A 10% buffer has been recommended and for Stoke Golding this would give a housing requirement of 158 2020-2039. It could also help to address any requirement for the Borough to accommodate unmet housing need from the city of Leicester.	The submission plan retains the method of extrapolating 3 dwellings per annum derived from the Core Strategy but changes the plan period for housing from 2006 – 2039 to 2020 – 2039 and the minimum requirement figure from 99 dwellings to 57 dwellings. It also clarifies that windfall provision would be in addition to the 57 dwellings. HBBC does not consider this approach is appropriate for a number of reasons: 1. Reliance upon the Core Strategy distribution of dwellings is flawed. It is acknowledged that para 67 of the NPPF asks local planning authorities to provide indicative figures for neighbourhood plans taking into account need, population and "the most recently available planning strategy of the local planning authority" and that the Core Strategy 2009 is the most obvious embodiment of such strategy. However the strategy for housing growth set out in the Core Strategy is dated and cannot be relied upon moving forward into a new plan period. The evidence base supporting that strategy such as the Regional Spatial Strategy and prevailing government policy no longer applies and it is not appropriate to base future plans on this dated approach. In addition the Core Strategy predates the changed planning framework set out in the NPPF and, in particular, the new emphasis to significantly boost the supply of housing. Whilst a new development strategy is being developed through the emerging local plan it has to be acknowledged that planning policy, including issues around

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	Borough population 111,370 Stoke Golding population 1,861 Percentage 1.7% Borough Need 8,588 1.7% to Stoke Golding 144 10% uplift 9,447 1.7% to Stoke Golding 158 HBBC recommends that the Stoke Golding NP makes 158 dwellings its housing requirement for the period 2020 – 39. This accords with the "Standard Method", reflects the approach described by the examiner of the Burbage Neighbourhood Plan, and is considered a sensible approach in advance of a figure being provided through the emerging Local Plan. Should an alternative approach to the above be pursued through the Neighbourhood Plan this would need to be based on sound evidence and justified so satisfy the examiner of the Neighbourhood Plan. As noted above the Borough may need to accommodate unmet housing need from the City of Leicester. In December 2020 the Standard Method for establishing housing need for Local Planning Authorities was revised so that the housing need for the 20 largest cities in England, including Leicester, was increased by 35%. This is likely to lead to a significant increase in the level of unmet housing need arising in Leicester. Whilst work is ongoing across Leicester and Leicestershire to agree a method of apportioning this unmet need it is possible that the	housing delivery are different to that when the Core Strategy was adopted in 2009. 2. Until HBBC's local plan is sufficiently advanced to provide a housing requirement for neighbourhood plans, apportionment of the borough's housing requirement by population is considered a more appropriate approach. It provides for a consistent approach to multiple neighbourhood plans under preparation. It provides a fair and transparent starting point for all localities upon which adjustments can be advanced based on local planning circumstances. HBBC have recommended this approach, in advance of the local plan, since July 2020. HBBC's comments on the pre-submission neighbourhood plan invited consideration of reasons for diverging from the population apportionment that could be considered by the examiner of the neighbourhood plan. HBBC still considers that this will be a worthwhile exercise capable of arriving at a housing requirement that is most appropriate for Stoke Golding. 3. Leicester City's has declared an unmet housing need. The standard method for calculating housing requirements of local authorities gives HBBC a very similar annual figure (452) to that of the Core Strategy (450). However, the consequences for HBBC of Leicester's unmet housing need and the revision to the standard method for large cities late last year, including Leicester, have not yet been factored in. This means that the final annual figure for the borough as a whole may be higher than 452 to help meet a proportion of Leicester's unmet need For the reasons given above, HBBC cannot support an approach to establishing a housing requirement based on the Core Strategy. HBBC considers a reasonable starting point for establishing a

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	Borough may be expected to accommodate part of this additional 35% uplift. It is therefore considered important that neighbourhood plans in the borough are flexible enough to respond to a potentially higher housing need figure in the emerging local plan. Without flexibility it is possible that neighbourhood plans may quickly become out of date.	housing requirement figure for the neighbourhood plan would be a method based on population apportionment, and as demonstrated in the response to the Reg 14 consultation, the starting point would be around 158 dwellings for the period 2020-2039
4.12 plan period	Paragraphs 4.12. HBBC is encouraging neighbourhood plans currently under preparation to plan for the period 2020-39. It is logical and standard practice for housing requirements and planning supply to apply to the plan period; this means that both annual requirements and housing completions for the *preceding period* should not be included.	Paragraph 4.13 has been updated to reflect this point.
4.12 Windfall allowance	Paragraphs 4.14 and 4.15. Rewording is recommended to reflect there being a housing requirement of 158 dwellings 2020-39. An allowance for windfall development can be made based on past trends. HBBC calculates that from 2006 to 2020 there were 38 windfall dwellings delivered in Stoke Golding giving 2.7 windfall dwellings a year which would equate to 51 dwellings over the plan period. A word of caution is that the figure might need to be reduced if there is cause to believe that opportunities for windfall development will reduce over the plan period.	Regarding the suggestion to incorporate a windfall allowance paragraph 4.12 of the submission neighbourhood plan says that windfall provision would be in addition to the requirement. HBBC understands that with a housing requirement of only 57 dwellings and the recent permission for 65 dwellings at East of Roseway, a windfall allowance is unnecessary. But in HBBC's opinion, a housing requirement of 158 would be more appropriate, in which case a windfall allowance may need to be considered.
4.13	Paragraphs 4.13. Past completions prior to April 2020 should not count towards housing supply in the period 2020-2039, so the completions at Bosworth Manor and Convent Drive would not count; however, they could contribute toward a windfall allowance – see below.	Paragraph 4.13 has been updated to remove reference to developments completed prior to April 2020 and add reference to the development at East of Roseway that was approved recently.

Submission 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
Policy SG1	Policy SG1. A title "Housing Requirement" would better reflect the intention of the policy, than "Provision" which can suggest supply. If a windfall allowance is included, Policy SG1 should set out the overall requirement figure, the windfall allowance and the remainder to be met by allocations.	Title of Policy SG1 is changed to Housing Requirement.
Policy SG1	Policy SG1. A title "Housing Requirement" would better reflect the intention of the policy, than "Provision" which can suggest supply. If a windfall allowance is included, Policy SG1 should set out the overall requirement figure, the windfall allowance and the remainder to be met by allocations.	Regarding HBBC's recommendation to reword paragraphs 4.15 and 4.15 by setting a housing requirement of 158 dwellings 2020 – 39 the submission draft neighbourhood plan has not carried forward paragraphs 4.14 and 4.15 at all. Policy SG1 sets a requirement of 57 dwellings 2020 – 39 which HBBC considers inappropriate for the reasons set out under paragraphs 4.11 – 4.12 above.
Policy SG1	Policy SG1. A title "Housing Requirement" would better reflect the intention of the policy, than "Provision" which can suggest supply. If a windfall allowance is included, Policy SG1 should set out the overall requirement figure, the windfall allowance and the remainder to be met by allocations.	Policy SG1 says the housing requirement of 57 dwellings will be met by the permission for 65 dwellings on land East of Roseway plus windfall. If the housing requirement were increased to 158, a further option to help meet the requirement is the recent permission for up to 55 dwellings at Wykin Lane granted at appeal (APP/K2420/W/20/3262295) on 21/5/21. Potential supply options: East of Roseway: 65 Wykin Lane 55 Windfall allowance 51 Total 171 The Mulberry Farm site offers potential for further flexibility in case windfall delivery does not materialise as forecast.

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Paras 4.16 – 4.18. Site Selection	Comments made on pre-submission plan evidence. The RAG assessment has merit as a locally determined assessment of local preferences. But there will be questions over the subjective nature of the scoring and the detailed reasoning is not readily apparent. For example, how was it concluded that the Mulberry Farm site, including both the land with farm buildings the open land, should be scored Amber rather than Red in terms of impact on the designated Bosworth Battlefield? There is reference to the process of scoring being carried out at public meetings that were minuted, but the examiner will want to understand the scoring without having to trawl through minutes of several meetings. It would be better if the reasoning behind site scoring could be assembled in one place.	A summary of the conclusions for each the sites assessed is provided in the document "Summary of Rationale for Site Selection for AECOM" but it is not fully apparent how the scores for each site were arrived at. The scoring and analysis of each site set out in Appendix B of the SEA is helpful, but it is assessing different criteria to the Sustainable Site Assessment.
Para 4.19 and Policy SG2 Mulberry Farm	Paragraph 4.19 and Policy SG2 Mulberry Farm. HBBC welcomes the extent to which the allocation has been scaled back to include the recognised improvement area only, as this greatly reduces the potential of negative effects on the historic environment. Is there evidence of the remaining site being deliverable within the plan period? As Mulberry Farm is the only proposed allocation, this is likely to be a question of the Examiner. The NP Group may wish to explore whether the landowner can provide evidence of current developer interest in the site? Criterion 1: the policy needs to be clear on the minimum number of dwellings achievable	The submission draft neighbourhood plan relegates this site from an allocation to a reserve site. The purpose of reserve housing sites is to provide future flexibility for later in the plan period if more housing is needed than necessary. They are normally sites which are held back by planning control to be released if certain circumstances are met. In the case of Mulberry Farm, the site is a redundant poultry farm comprising redundant derelict buildings and falls within the settlement boundary as defined in HBBC's Site Allocations and Development Management Policies DPD (p.89). The neighbourhood plan is proposing to redraw the settlement boundary to exclude the site. HBBC's Conservation Area Appraisal considers the site as unattractive and in need of improvement, such that development for housing could improve the setting of the historic Bosworth battlefield. As such, is there

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	Criterion 2: unnecessary duplication. Can rely on Policy SG5 without repetition here Criterion 3: the Examiner will want to know if access is possible off High Street. Has the highway authority given an opinion? Criterion 4: Remove the proviso, "unless removal is necessary to provide a safe and suitable access". This presumes that the locally listed building will need to be demolished to provide access, presenting a fait accompli. Criterion 8: The requirement for a LVIA would be excessive considering that the acceptability of housing development in principle has already been established by the allocation, which implies that the impact of housing development on the wider landscape is acceptable. A Design and Access Statement will be required for the planning application. An assessment of street scenes and heritage would be more appropriate than a LVIA. Criterion 9: Duplicates the Development and Design policy (DM10a+b) of HBBC's Site Allocations and DM Policies Plan 2016. Are there any other site specific issues of amenity, other than impact of the White Swan PH covered in criterion 10 that will be unique to this site? Criterion 12: Duplicates the Preventing Pollution policy (DM7e) of HBBC's Site Allocations and DM Policies Plan 2016 Criterion 13: Duplicates the Development and Design policy (DM10h) of HBBC's Site Allocations and DM Policies Plan 2016. Are there any site specific drainage issues that could be identified?	any reason in principle to hold the site back for future development as implied by designation as a reserve site? Regarding the concern about developability of the site Appendix 3 of the Consultation Statement (p.96) explains that the site is the subject of an Option Agreement with a house-builder, and that the house builder is meeting the Neighbourhood Planning Steering Group and the Parish Council about bringing the site forward. HBBC accepts that the significance of the lack of supporting information is reduced because the site is now advanced as a reserve site rather than an allocation. Regarding the policy criteria, only some of the concerns raised at pre-submission stage have been addressed: Criterion 3- The developer's agent has confirmed that a suitable access can be achieved. The Highway Authority has no objection to the allocation of this site. Criterion 4. The NP group wishes to retain the proviso about allowing demolitions for highway access. This is because Mulberry Farm is not locally listed and the Conservation Area Management Plan is not adamant that the traditional brick buildings have to be retained (it says every effort should be made to retain them). Criterion 8. It is acknowledged that the SEA recommends a LVIA for Policy SG2 and SG3, but HBBC maintains its objection to the requirement for a LVIA. It will be unreasonable to require an LVIA

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		as the principle of development will be established by its designation. The remaining concerns remain about expressing the number of dwellings as a minimum (criterion 1) and unnecessary duplication of HBBC policy (Criteria 2, 9 12 and 13)
Suggestion for insertion of housing supply information.	Suggestion for new text after Policy SG2 Given a housing requirement of 158, a windfall allowance of 51 and question marks over the deliverability of Mulberry Farm, other allocations will need to be considered. The most obvious opportunities for additional allocations include the proposed reserve site at Stokesfield Farm (South of Hinckley Road) and the recent outline permission for development of up to 65 dwellings on Land East Of Roseway (20/00779/OUT). If the deliverability of Mulberry Farm cannot be demonstrated, there would be a shortfall that would need to be met by a further allocation. Also, increased flexibility would be provided if a new reserve site could be identified to replace Stokesfield Farm. Housing requirement -158 Windfall allowance 51 -107 East of Roseway 65 -42 Stokesfield Farm 25 -17 Mulberry Farm 25? +8 Although permission has been granted in outline, it would still be worth setting out a Policy for Land East of Roseway similar to Policy SG2, to guide the form of development. Many detailed matters are still to be agreed if the outline permission is pursued, and one cannot be sure that there will not be further outline or full planning applications in the future that the NP could influence.	With a housing requirement of 158 for the plan period as HBBC recommends (see response to paras 4.11 – 4.12 above) the neighbourhood plan needs to demonstrate a sufficient housing supply to meet this requirement. The submission NP fails to do this. The submission NP proposes to acknowledge the East of Roseway permission for up to 65 dwellings with an extension to the settlement boundary on the policies map. There is now the potential to include the permission granted at appeal for upt to 55 dwellings at Wykin Lane. If this is included in the supply Mulberry Farm becomes optional. However, the development of Mulberry Farm provides potential to improve the appearance of a site with derelict buildings. In commenting on the pre-submission plan, HBBC had suggested a windfall allowance could be made of 51 dwellings over the 19 year plan period. See comments on paragraph 4.12 above for more explanation. Housing requirement -158 Windfall allowance 51 -107 East of Roseway 65 -42 Wykin Lane 55 +13

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Deletion of Pre-Submission Draft Policy SG3 Reserve Site Stokesfield Farm	Paragraphs 4.21 – 4.22 and Policy SG3 Reserve Site Stokesfield Farm. Following the logic of the above comment, paras 4.21 – 4.23 and Policy SG3 would need to be recast to present land at Stokesfield Farm as an allocation rather than a reserve site. The explanatory chronology of proposing then withdrawing the remainder of Mulberry Farm in paragraph 4.22 is unnecessary baggage. It will have seemed an important step in plan preparation over the last year, but will soon be forgotten. For the record, the reasons for the change have been set out in the Site Selection background evidence. HBBC supports the principle of having a reserve site (as a replacement for Stokesfield Farm) available for release if necessary. The following comments on the wording of Policy SG3 can apply to Stokesfield Farm as an allocation or could be carried forward to a new reserve site: Current wording says the site will be made available if it becomes necessary to provide additional homes in accordance with the new Local Plan. To avoid any dispute about when a reserve site becomes available it would be worth adding wording to clarify at what point in the process of Local Plan preparation the site is released for development. Criterion 1: policy needs to be clear on the *minimum* number of dwellings achievable	Accepting the appropriateness of a housing requirement of 158 for the plan period as HBBC recommends (see response to paras 4.11 – 4.12 above), with the recent permission granted at appeal for 55 dwellings at Wykin Lane, the case for including Stokesfield Farm is reduced. Given that the site performs well in the Sustainable Site Assessment, including part of Stokesfield Farm as a Reserve Site would give the neighbourhood plan resilience to deal with any future increases in housing need later in the plan period and strengthen a “plan led” approach in the face of pressure for release of land in the countryside.

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	Criterion 2: unnecessary duplication. Can rely on Policy SG5 without repetition here Criteria 3 and 7: applicable to the Stokesfield Farm site, the Examiner will want to know if access is possible off Hinckley Road and implications for the bus stop. Has the highway authority given an opinion? Acceptable highway access will also need to be demonstrated on any new reserve site. Criterion 4: This clause should not be used in relation to any allocation or reserve site as a policy cannot be used to preclude further development in the future. Criterion 5: Unless recommended by LCC Archaeology the exact level of Archaeological work should not be specified as a requirement. This should be left to the statutory consultee. The criterion should just state than an archaeological assessment may be required. Criterion 6: The requirement for a LVIA would be excessive considering that the acceptability of housing development in principle has already been established by either allocation or reserving the site, which implies that the impact of housing development on the wider landscape is acceptable. A Design and Access Statement will be required for the planning application. An assessment of street scenes and heritage would be more appropriate than a LVIA. Criteria i, ii and iii under point 6 should be given their own numbers (rather than being a sub-set of 6.) as they concern separate issues. Criterion 8: Duplicates the Development and Design policy (DM10a) of HBBC's Site Allocations and DM Policies Plan 2016. Are there any site specific issues of amenity that will be unique to this site?	

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	Criterion 9: This criterion may not be needed if a new reserve site does not sit below power cables. The criterion is laudable for reasons of visual amenity, but is it known whether the replacement of the overhead cabling with underground cabling is necessary to allow the development to go ahead and whether the cost can be realistically covered by the development? It may not be a planning matter, rather a matter for the statutory undertaker. Criterion 10: Duplicates the Development and Design policy (DM10h) of HBBC's Site Allocations and DM Policies Plan 2016. Are there any site specific drainage issues that could be identified?	
Map 3 Housing	Add "Settlement Boundary" to the title of Map 3.	The title Settlement Boundary would be more appropriate for Map 3 as it is also relevant to other policies than housing including SG6 concerning countryside.
Map 3 Housing	The Settlement Boundary ought to be drawn round the site of the outline planning permission for housing at Land East of Roseway.	The settlement boundary is redrawn to include Land East of Roseway. However, there is a small patch of open land to the east of 77 Roseway that falls outside of the red-line boundary of the planning permission for 65 dwellings. The proposed settlement boundary would make this land part of the settlement and therefore less protected from development than if the line were drawn to exclude. It is not clear if this is deliberate or a possible oversight and whether the small patch of open land has value as open land?

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		The settlement boundary ought to be re-drawn to include the Wykin Lane permission for up to 55 dwellings granted at appeal.
Map 4 Housing Allocation	Map 4 at 1:5000 scale reads as a location plan for the proposed allocation and reserve site. If someone were interested in precise boundaries, for example wanting to know if a tree or fence lay inside or outside the site they would struggle at this scale. If individual site maps could be provided at either 1:1000 or 1:500, more detail about each site would be apparent. Map 3 serves adequately to show the locations of the sites within the village.	The submission draft contains a 1:2500 scale map of the Mulberry Farm reserve site, which is a significant improvement on the pre-submission draft, but would be better at 1:1000 scale. The Consultation Statement says "no change" and that HBBC has site maps at much lower scale. However, this is no reason for a neighbourhood plan not to provide maps at a scale that makes them legible for their purpose, particularly as NPs are expected to have a larger audience of non-professional local people.
4.22 – 4.23 and Policy SG3 Windfall Housing Development	Paragraph 4.25 and Policy SG4 "Infill Housing Development". The subject matter of Policy SG4 concerns housing development inside and outside of the Settlement Boundary. As such it goes beyond what the title, "Infill Development" suggests. Consider using a new title that better reflects the purposes of the policy. Point 3 should make reference to the NPPF (para 19) as this is where this text originates and is normally the only reason to have to include such exception. Of the exceptions where development outside the Settlement Boundary may be permissible listed in Policy SG4, several merely duplicate Site Allocations and Development Management Policies: 4 (DM5), 5 (DM14) and 6 (DM15). If a cross reference to the relevance of SADM policies is desired, paragraph 4.25 could be added to: "…will not normally be supported with the exception of the instances specified in Policy SG4 and the exceptions allowable under Local Plan policies:	The title of the section and policy is helpfully changed to "Windfall Housing Development". The other suggestions of HBBC to cross reference the NPPF in criterion 3 and reduce duplication with HBBC local plan policies have not been accepted.

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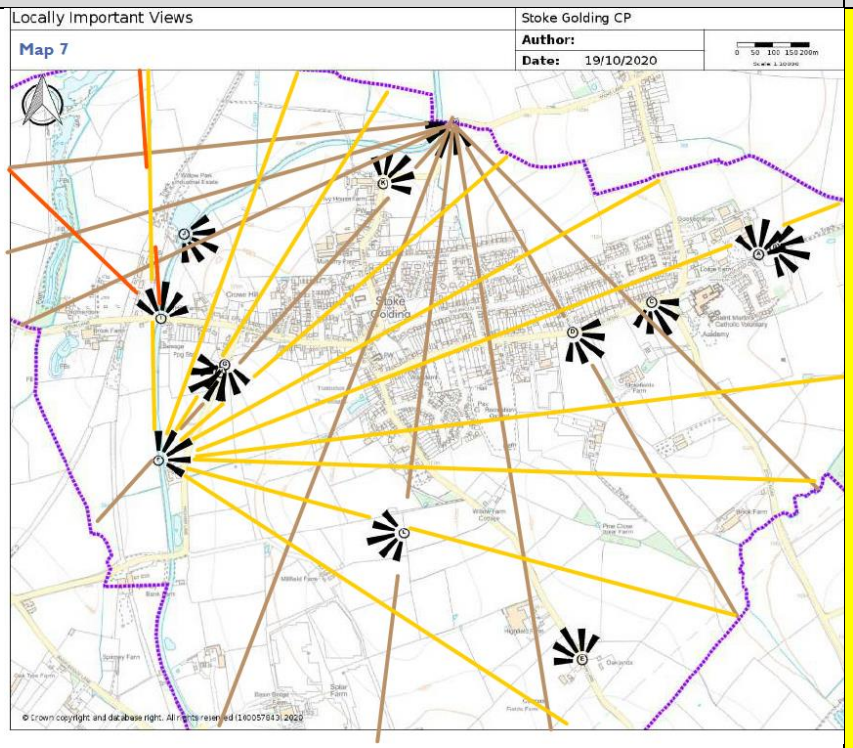
	• Rural worker accommodation (Policy DM5) • Replacement dwellings (Policy DM14) • Re-use and adaption of redundant rural buildings (DM15) and • Exception sites for affordable housing (CS17)"	
4.24 – 4.29 and Policy SG4 Housing Mix. Meeting Local Housing Needs and Needs of Older People	Paragraphs 4.26 – 4.30 and Policy SG5. The information in the Housing and Economic Development Need Assessment 2017 has been superseded by the HBBC Housing Needs Study (https://www.hinckley-bosworth.gov.uk/info/1004/planning_policy_and_the_local_plan/1610/housing_needs_study_2020) Refer to the above for updated information on housing mix and size – update table at 4.27 with new information. The table also needs a title and source Policy SG5 could refer to the housing needs study and subsequent updates. .	The submission NP includes updated text and data from the later evidence.
5.30 – 5.32 Self-Build	Paragraphs 4.31 – 4.33 The data in paragraph 4.33 could be updated to state that at 30th October 2020 there were 72 people on the register. The following sentence stating that none of these specifically sought a plot in Stoke Golding could be extended to note however that 22 people stated a preference for a rural location. Is it assumed that the NDP will defer to the local plan on self-build policies?	The submission draft updates the data to 72 people at 2020, but the Consultation Statement says that as there is no specified need of plots in Stoke Golding a self-build policy is unnecessary. Reference should be made to emerging Local Plan Policy HO-06
4.33 – 4.35 and Policy SG5 Affordable Housing	Paragraphs 4.34 – 4.36 and Policy SG6. Policy SG6 almost duplicates requirements of Core Strategy policies CS15 (Affordable Housing) and CS17 (Rural Needs). One difference is that Policy SG6 expects occupation of *all* affordable housing provided in Stoke Golding to be subject to a	Duplication with HBBC's Policy CS15 remains. The application of the policy concerning rural exception developments to areas within the settlement boundary does not make sense

Submission 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
	local connections priority, whereas this is only a requirement for affordable housing secured for Rural Needs (CS17) in the case of Core Strategy policy. Another difference is that Policy SG6 defines local connection as including "…close family ties…" whereas Policy CS17 defines this as an existing family connection. A further difference is that Policy SG6 describes Rural Exception sites as being possible *within* the Settlement Boundary. It is generally the case that to be "exceptional" these sites have to be proposed in locations where permission would not normally be granted, which would fit with locations outside the Settlement Boundary of Stoke Golding, but not within. Duplication would be reduced if: i) the supporting text made cross reference to Local Plan policy requirements for affordable housing and ii) Policy SG6 were reworded to set out only the aspects of the affordable housing requirement that are different in Stoke Golding.	HBBC does not object to the local connection aspects of the policy being different to HBBC's policy.
Policy SG6: Countryside	Could SG7 be reworded to concentrate on the policy provisions that add additional considerations, rather than duplicating HBBC SADM policy?	Duplication with HBBC's Site Allocations and Development Management Policy DM4 remains
5.8 – 5.9 and Policy SG7 Areas of Separation	Paragraphs 5.8 – 5.9 and Policy SG8. Could the wording of this policy be strengthened? Once the East of Roseway development proceeds, the remaining countryside gap with Dadlington is of critical importance to the separation of the two settlements, such that stronger wording could be justified to resist further encroachment into the gap between settlements. The final sentence "Any development	Policy strengthened by deletion of final sentence and reference to the East of Roseway permission in the supporting text.

Submission 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
	proposal…" implies development can acceptable in principle providing that location, design and landscaping is acceptable.	
Para 5.10	Map 6 is not on p.29.	Map moved to p.29
Policy SG9 and Fig 9 Public Rights of Way	Policy SG10 and Fig 9. As there is a policy requirement, there needs to be a clear full page map with a key showing existing PRW, the long distance footpaths and any proposals for improved links (which should be schematic, if precise routes are not yet known).	Figure 9 provides a poor representation of rights of way and does not include any suggestions for new links or where improvements to existing are needed. If the NP is unable to include a clearer map, reference to the Definitive Map of Leicestershire County Council ought to be made in the supporting text.
5.23 – 5.26, Map 7 and Policy SG10 Important Views	Paragraphs 5.23 – 5.26, Map 7 and Policy SG11 Taking the arc of vision suggested by the viewpoint symbols on Map 7, every part of Stoke Golding Parish is covered by one or more Locally Important View (see sightlines added to map below). The ubiquitous generality of the coverage will diminish the value of the key ones. It would be better to seek to preserve the best views rather than apply blanket coverage to all. Also, more explanation is needed to understand what is valuable about each of the views, particularly where this can be linked to any features highlighted in the Borough Landscape Character Assessment. As part of the NP evidence, the Parish website hosts a document "Locally Important Views" (ref VW1) with large photographs of views around Stoke Golding but it is not clear which ones relate to the Locally Important Views listed on Map 7.	The number of views is rationalised to 7 key ones which overcomes HBBC criticism of the pre-submission plan. The Policy text refers to major developments needing to submit LVIAs but paragraph 5.26 still refers to "large developments" The supporting evidence ought to be updated to provide context and explanation of what is thought valuable in the 7 key views.

Submission 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
	 5.26. This paragraph requires a Landscape and Visual Impact Assessment (LVIA) for “large developments” and “proposals that are likely to impact on Locally Important Views”. To avoid uncertainty about when LVIAs are or are not required, further explanation is recommended to give guidance on what counts as “large” development and what degree of impact on views, perhaps with some examples. Use of the term “Major” which is	

Submission 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
	defined in Government regulations could be an alternative to "large" which would otherwise need to be explained. View D looks across land proposed as the reserve housing site (Stokesfield Farm). If the NP accepts that housing development (albeit, reserved for a future date) in the foreground of one of the highly characteristic views defined by Policy SG11 would accord with the provisions of Policy SG11, the same argument could be advanced for all the other highly characteristic views. To avoid this, View D ought to be deleted or moved to beyond the boundary of the proposed site.	
5.27 – 5.29, Policy SG11 and Map 6 Ecology and Biodiversity	Paragraphs 5.27 – 5.29, Policy SG12 and Map 6. As the Local Wildlife Sites (LWSs) listed in the policy have distinctive features of value, it would be helpful for the location of individual sites to be referenced on Map 6. This locational information would make it easier to evaluate the impact of proposed development on the LWSs. BAP Priority Habitats is referenced in the Policy but not explained in the supporting text. "Midlands' style" hedge laying is referenced in the Policy but not explained in the supporting text.	Site references have been added to Map 6 but neither cross references nor explanations of BAP Priority Habitats or Midlands style hedging are provided in the supporting text. A map of Local Wildlife sites is required for clarity.
5.30 – 5.33 and Policy SG12 Trees and Hedgerows	Paragraphs 5.30 – 5.33 and Policy SG13 As woodland is very limited in Stoke Golding (para 5.6) innovative policy could be considered that insists that new development provide new trees on the basis of number of trees per new floor space, and where it is not physically possible to provide new trees on-site, the NP could identify appropriate locations in SG parish where new tree planting would be	The comment on the pre-submission draft NP was made as an optional suggestion The essence of HBBC's suggestion is that new development would be required to plant trees which would not fall outside of the scope of neighbourhood planning, but would require resources to prepare evidence and justification that may not be available.

Submission 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
	directed instead. Such locations would need to be agreed with the landowner and clearly mapped. Supporting evidence can be taken from the Green Infrastructure Strategy.	
5.34 – 5.41 and Policy SG13 Renewable Energy	Paragraphs 5.34 – 5.41 and Policy SG14. Regarding the criteria of SG14 for solar farms, 1. How does the priority for previously developed / non-agricultural land work in practice? Are there meaningful quantities of such land available in Stoke Golding? Does it mean that small plots of such land that happen to be available must be used in conjunction with a permission for greenfield agricultural land? 3. Important grammatical nuance. As currently worded "sensitively" applies to the *process* of selecting land. Suggest rewording to require the location to be sensitive to the landscape.	Wording changed to reflect location of solar farms being sensitive to the character of the landscape. The previously raised concern about the practical availability of brownfield and non-agricultural land is not significant as the clause says "wherever possible".
5.34 – 5.41 and Policy SG13 Renewable Energy	Regarding the proposed policy on development of wind turbines, is a total embargo justified? Are some locations inappropriate because of landscape quality, but other locations appropriate for certain sizes or types of turbine?	From the Consultation Statement it is explained that national planning policy allows for blanket restriction against wind turbines if the local community wants that approach. However, the examiner of a similar policy in the Markfield Neighbourhood Plan recently concluded that a justification for prohibiting all scales of wind turbine regardless of impact had not been adequately made. Evidence of such justification has not been provided for the Stoke Golding NP either.

Submission 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
Para 6.10	Paragraph 6.10 reference to Map 9 should be to p46	Reference corrected
6.28 – 6.32, Map 9 and Policy SG14 Non-Designated Features of Local Heritage Interest	Paragraphs 6.28 – 6.32, Map 9 and Policy SG15 6.29 Page reference to map incorrect. Should be to p46. The wording of Policy SG15 is proportionate and conforms with Policies DM11 and DM12 of the Site Allocations and Development Management Policies DPD and Section 16 of the NPPF. The reference to taking opportunities to enhance or better reveal their significance is welcomed. Inclusion of the important local buildings identified within the Conservation Area Appraisal within policy SG15 is supported. However there are a number of other sites of interest included on the Leicestershire Historic Environment Record (as acknowledged in para 6.32) so is there a reason why just five sites from this source have been specifically included within Policy SG15 (these are entries AA-EE)? If the Group wish to only identify these five sites only perhaps a greater articulation as to why the sites have been included within the policy is required, i.e. why are they of local significance? It is likely that the local significance of the former railway station (AA) and WW2 observation tower (EE) warrant identification within the policy. Are there any physical remains of the ditches and boundaries at Laburnum Cottage (DD) following the recent completion of the re-development of the site – i.e. are there any features left to preserve that would warrant specific inclusion within this policy? Also the extent of the turnpike road (BB) is	Map reference corrected in paragraph 6.29. Additional references added to Map 10 (Map 9 in the pre-submission draft NP) so that the heritage assets of Policy SG14 can be located. The settlement and conservation area boundaries are amended on the Policies map to avoid confusion. Map 10 (Map 9 in the pre- submission draft NP) no longer shows the conservation area boundary. Commitment given to update the supporting evidence to explain the importance of heritage assets. No policy protection has been introduced to protect ridge and furrow fields as suggested by HBBC.

Submission 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
	not very clear on the Policies Map (pages 66 and 67) whilst the positon of the flint scatter north of Millfield Farm (CC) does not appear to be on the Policies Map (when compared to its position marked on the HER map). There appears to be some faint and well-defined areas of ridge and furrow surrounding the village, has the Group given any consideration to identifying this remnant of the medieval landscape and whether a policy identifying it as a non-designation heritage asset and seeking its preservation and enhancement is required? There are a number of other emerging NDPs within the HBBC area that have a specific policy for ridge and furrow so there are examples that could be presented to the Group Policy SG15 and Map 9. As the features of local heritage interest listed in the policy have distinctive features of value, it would be helpful for the location of individual sites to be referenced on Map 9. This locational information would make it easier to evaluate the impact of proposed development on the features of heritage interest. Map 9. The map could be made more legible if the area boundaries were better differentiated. One option could be to make the Conservation Area boundary dashed or dotted rather than a solid line. The same comment is made regarding the Conservation Area boundary on the Policies Maps below.	
Policy SG15 Design	Policy SG16. HBBC supports this Policy as it seeks to preserve the historic environment. But with some additional wording it may also present opportunities to enhance the	No changes have been made in response to HBBC's suggestions.

Submission 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
	historic environment. In the policy text after the word *protect* in limbs 2, 6i and 6ii consider adding to this so it reads *protect and where possible enhance…* The place making requirement of criterion 6 may be difficult to achieve for certain types of development. Could add "As appropriate to the scale of development…" to the beginning of the clause?	
7.1 – 7.3 and Policy SG16 Local Green Spaces	Paragraphs 7.1 – 7.2 and Policy SG17. The 11 candidates closely match most of the open spaces defined and protected by Policy DM8 of HBBC's Site Allocations and Development Management Plan (SADMP). Differences are: i) SGNP site H (Convent Drive) has a larger footprint than SADMP STG12PP including part of STG13 (St Martins Allotments) and some undesignated amenity land to the south ii) SGNP Site I (St Martins Allotments) is narrower than SADMP STG13 having included land in site H instead iii) SGNP Site J (Laburnam Gardens) appears to be a much smaller part of SADMP STG05 (High Street Allotments) iv) SGNP Site K (St Margarets CoE Primary School Playing Fields) is larger than SADMP STG07, incorporating additional open space that forms part of STG 19 (St Margarets School Community Facility) Local Green Space (LGS) designations have a higher protection status consistent with Green Belt policy, so require a higher level of justification than open spaces of a local plan. The NPPF sets out criteria (paragraph 100)[Para 102 of July 2021 Revise NPPF]:	The submission plan proposes only one space to be a Local Green Space. This is the Zion Baptist Church Allotments. The Discussion Paper on Local Green Spaces explains the rationale for going with only one of the candidate sites. Evidence will be required to show how the allotments site meets the tests of the NPPF a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land'.

Submission 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
	'The Local Green Space designation should only be used where the green space is: a) in reasonably close proximity to the community it serves; b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and c) local in character and is not an extensive tract of land'. Paragraph 7.2 explains that the NP consultation is designed to elicit views of landowners before a decision is taken on which sites to propose as LGSs in the submission NP. However, evidence will also need to be provided to illustrate how proposed LGSs meet the NPPF criteria for designation.	
8.1 – 8.2 and Policy SG17 Community Services and Facilities	Paragraphs 8.1 – 8.2 and Policy SG18. Duplication of SADM Policy DM25? Policy DM25 (community facilities) and DM8 (open space, sport and recreational facilities) provide qualified protection to most of the facilities listed. Policy DM22 provides qualified protection for the village convenience store. The pubs and Stoke Golding Club are not identified for protection in the SADM Plan, but Policy DM25 still would provide some qualified protection for such facilities. Stoke Golding Plan Facility — SADM Plan Ref A. St Margarets CE Primary School — STG19 B. Stoke Golding Surgery — STG22 C. Stoke Golding Recreation Ground (DM8) — STG10	The first sentence of Policy SG17 (SG18 in pre-submission draft): Community Services and Facilities is modified to read: "Development must show appropriate regard for the retention of the community facilities listed below in accordance with Site Allocations and Development Management Policies DPD Policies DM8, DM22 and DM25:" This ensures that the spaces and shop in the list of facilities are offered protection under the appropriate HBBC policies.

Submission 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
	D. Village (Sehmbi) convenience store (DM22) STG15N E. Village Pubs a. The George & Dragon b. The Three Horseshoes c. The White Swan d. Stoke Golding Club F. Community Halls a. The Baxter Hall STG18 b. Methodist Hall STG20 c. Village Hall STG21 d. Stoke Golding Club G. Places of Worship a. St Margarets Church STG17 b. Methodist Church STG20 c. Zion Chapel STG16 H. Allotments STG03, 05, 13 (DM8) Policy SG18 needs to be reworded to either: i) Add that retention of facilities should also be in accordance with Policies DM8 and DM22 (to cover the allotments, recreation ground and convenience store), or ii) Take the allotments and recreation ground out of Policy SG18 and ensure they are covered by the submission version of Policy SG17 (Local Green Spaces). Take the convenience store out of Policy SG18 and ensure it is covered by Policy SG19 (Village Centre)	

Submission 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
8.3 – 8.10 Education and Stoke Golding Surgery	Paragraphs 8.3 – 8.10. Paragraph 8.5 says St Margaret's School is oversubscribed. Give consideration to whether this will remain the case for the duration of the neighbourhood plan, as the demographic need for child places can change significantly over a small number of years. Adding a time reference to the statement would be helpful, for example, "At 2020 the school was oversubscribed." Paragraph 8.5 raises concern about school overcrowding and 8.10 relays concerns expressed in the household survey that the GP surgery is at capacity and that further housing development will lead to a poorer service. Cross references to Policy SG20 "Infrastructure" would help direct readers to the requirement for major new development to contribute to infrastructure improvements including St Margarets School and Stoke Golding Surgery.	Date references added. No cross reference to Policy SG20 to link school and GP capacity issues with infrastructure policy
8.11 – 8.12 and Policy SG18 Village Centre	Paragraph 8.11 and Policy SG19. Regarding Paragraph 1 of Policy SG19. SADM Plan policy DM22 and map on p.89 defines the Stoke Golding Neighbourhood Centre with physical boundaries, as do the Policies Maps (pp 66 and 67) of the Stoke Golding Neighbourhood Plan, albeit labelled as Village Centre. However, Map 11 of Stoke Golding Neighbourhood Plan only shows the location of a number of facilities, and does not show the Neighbourhood Centre; most of the facilities are not located within the defined Neighbourhood Centre. As such, first paragraph of Policy SG19 is confused. It says the Village Centre will be maintained and, where possible, enhanced for	The policy, supporting text and maps have been comprehensively rewritten clarifying policy intentions with regard to new development, taking account of recent use class order changes.

Submission 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
	small scale shops / services for the use of the local community. Questions are: i. If "Village Centre" means the same defined area as Neighbourhood Centre, either the reference to Map 11 needs to be removed from the policy, or the Village Centre added to Map 11. Without this clarification, it is easy to think that the policy applies to the facilities identified on Map 11 which are spread over a larger area. It would be helpful if the supporting text could clarify that the Village Centre is the same as the defined Neighbourhood Centre in the SADM Plan, but with a different name. ii. What is exactly meant by the verbs "maintain" and "enhance"? Do they refer to the physical size of the area designated as the Village Centre? Does "enhance" mean physically extend, or improvement of quality? Or do the verbs refer to town centre uses, such that the loss of existing uses be resisted and new floor space encouraged that would enhance the centre? Policy on uses is set out in Paragraph 2, so would be unnecessary duplication in Paragraph 1. Greater clarification is needed, and if the Neighbourhood Plan anticipates any future expansion of the defined centre, could the location(s) for this be shown on the map? Regarding paragraph 2 of Policy SG19, this supports a list of uses where they will enable the Village Centre to continue to meet the needs of the community. It is presumed this means proposals for new floor space of the named uses would be	

Submission 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
	supported (in the Village Centre or anywhere in Stoke Golding?), providing that the existing facilities within the Village Centre would not be undermined in their ability to serve the needs of the local community. The question of *where* would such proposals be supported ought to be made clear. The defined Village/Neighbourhood Centre is quite small and ability to accommodate new floor space limited, so without qualification in the policy, readers may assume it means anywhere in Stoke Golding. The range of supported uses is extensive, and the locational consequences vary considerably. For example, the F1 uses are typically found out-of-centre within the residential areas that they serve. Conversely, pubs and takeaways typically gravitate to centres, and can cause residential amenity problems. Small scale convenience retail proposals might be welcome as a means of improving the local choice to meet local day to day needs, but at what scale would a proposal prejudice the existing convenience store? How will that judgement be made? If Policy SG19 is to offer qualified support to proposed uses beyond the Village Centre, thought will need to be given to whether different uses warrant a different policy approach, and consistency with the sequential approach of national planning policy and SADM Plan's policies DM21 and DM22. Regarding the third paragraph of Policy SG19, the first part "Proposals that could prejudice the Village Centre's ability to meet local day to day needs…will not be supported" is essentially the reverse wording of paragraph 2. It should be	

Submission 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
	possible to word Paragraph 2 so that this part of paragraph 3 would be unnecessary. The other element of paragraph 3 says that proposals that could lead to an over-concentration in any one use in the Village Centre, will not be supported. The defined centre is so small that it will be difficult to have more than 3 or 4 of the same uses, but thought needs to be given to how over-concentration would be defined, and would it be different depending on the use, for example 3 separate shops might be considered favourably, whilst 3 hot food takeaways unfavourably? Map 11 does not show a boundary for the Village Centre. In any case, the scale of Map 11 (1:10000) will not enable sufficient clarity of boundary to see which properties lie inside. A larger scale map of the Village Centre should be provided. Many questions have been raised about how Policy SG19 applies. Hopefully these will help the NP Group to focus and refine the policy into achieving what they think is most important, for example protecting the uses of the village/neighbourhood centre to provide a service to residents.	
8.34 – 8.35 Superfast broadband	Paragraphs 8.34 – 8.35 To help deliver improved broadband, the NP should consider making provision of optical fibre cable connections to new housing a requirement of the policies governing development of allocated and reserve sites and of other housing and	The Consultation Statement clarifies that superfast broadband is already available throughout most of Stoke Golding.

Submission 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
	employment development. Appropriate cross references to these policies should then be made in paragraphs 8.34-35.	
8.36 – 8.38 and Policy SG19 Infrastructure	Paragraphs 8.36 – 8.38 and Policy SG20 Regarding the second sentence, a more accurate wording of the need for developer contributions would be, “Sometimes these impacts can be detrimental and so developers will be required to mitigate the impact of their development by contributing to local infrastructure.” Policy SG20 - wording “Major new development will be supported by the provision of…”. This is ambiguous about who will provide the infrastructure. It should be made clear that it is an expectation for the developer to make provision where new development generates increased need for infrastructure use. The level of provision will depend upon viability of the development and it is unlikely that all improvements on the list could be funded. Could the policy or supporting text give a steer on how different improvements would be prioritised or chosen? Also, the policy applies to *major* new development which is defined nationally as inter alia housing developments of 10 or more dwellings. Where there is an evident need, HBBC policy seeks contributions toward green space improvements on schemes of less than 10 dwellings. To make sure the policy does not prevent HBBC from seeking contributions from developments of less than 10 dwellings, the following wording	Suggested rewording to clarify developer contribution requirements have not been undertaken. The suggestion to itemise and prioritise infrastructure needs has not been accepted. It is noted that the government is poised to reform the system of contributions.

Submission 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
	could be used: "Developments of new dwellings and other major development…." Is there evidence that the landowners, operators and regulating authorities of existing facilities such as the schools, GP Surgery and recreation ground are supportive of the extensions and improvements envisaged? With regard to the community infrastructure improvements (including the provision of parish notice boards, seats, children's play area equipment, bus shelters, litter bins), are these just generic ideas, or is there an inventory of specific proposals for which there is a demonstrable need for in particular locations? Are there any particular road related improvements envisaged as necessary in the village to control speed or volume of traffic generated by major housing developments? The reference to the Community Infrastructure Regulations 2010 may be dated. There have been many changes to national policy and regulations concerning S106 and the Community Infrastructure Levy, and the Planning White Paper 2020 proposes an entirely new regime. It might be safer to simply say "Contributions are governed by national regulations"	
9.1 – 9.12 Traffic & Transport	Paragraphs 9.1 – 9.12 . This section is largely descriptive of the way things are in Stoke Golding concerning roads, parking, public transport and cycling. Whilst it is true that many traffic matters do fall outside	The Consultation Statement states that community aspirations that do not rely on planning control for delivery are not a matter for the neighbourhood plan. HBBC accepts this is a matter for the neighbourhood group to decide.

Submission 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
	the scope of planning (as stated in para 9.1), there is also a place for neighbourhood plans to set out other aspirations for improvements, for example on-street parking controls, pedestrian crossings, traffic calming and improved bus services. Stating these in the NP can be instrumental in seeking infrastructure funding from public authorities. See advice on "Community Proposals" below. A policy addition could be a requirement to install an electric vehicle charging point for each parking space provided in new development? Government policy means that the number of electric cars will multiply during this decade and it is much cheaper for charging points to be included as part of development rather than being retro-fitted later.	The Consultation Statement also considers that anticipated government regulation on charging points means that neighbourhood plan policy on the matter will be unnecessary. HBBC addresses this matter in its new Local Plan.
10.1 – 10.11 Policy SG20 Tourism	Paragraphs 10.1 – 10.11 and Policy SG21 There is a degree of duplication with HBBC Local Plan policies; Policy 23 (Tourism Development) of the Core Strategy and DM24 (Cultural and Tourism Facilities) of the SADMDPD which include criteria to assess proposals for tourism development. In practical terms how will proposals for tourism facilities that have no demonstrable association with the battlefield and canal be considered?	The Consultation Statement clarifies that proposals for tourism facilities that are not associated with the battlefield or canal would be dealt with by HBBC planning policy, but the supporting text does not clarify this.
10.12 – 10.13, Policy SG21 and Map 13 Willow Park	Paragraphs 10.12 – 10.13 and Policy SG22. Para 10.12: correct the page reference to Map 12. Para 10.13: the Employment Land and Premises Study was updated to 2020 so the reference to 2013 needs to change to 2020.	Paragraph references updated Helpful additions made to Policy SG21 specify what types of business use would be appropriate and other provisos.

Submission 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
Industrial Estate	Policy SG22. Whilst the proposed protection of this key rural employment site of Willow Park in Policy SG22 is supported by HBBC in principal, the NP Group need to consider carefully the uses that it wants to protect. Policy SG22 refers to B2 (industry) and B8 (warehouse/distribution) uses but does not include offices, research and light industry (formerly the uses of the now redundant B1 class), now part of the broad E class which includes retail and other commercial uses. It is quite likely that Willow Park contains some existing office and light industrial uses, which would now have the right to change to retail or other E class uses without the need for planning permission. Nothing can be done about that, but if applications were made for new business development, including proposals for offices or light industry in the E class, Policy SG22 could be revised to offer support for these perhaps on the proviso that planning conditions are applied that would require planning permission to change to other E class uses that are not considered appropriate in that location.	Drafting error spotted on Map 13 (employment area). It copies HBBC's Employment Land and Premises Study (ELPS) outline for the industrial estate but the ELPS outline is wrong. The 2 dwellings to the front of the site should not be included.
10.14- 10.15 and SG22 Business Conversion of Rural Buildings	Paragraphs 10.14 – 10.15 and Policy SG23. Criterion 1: Could any rules of thumb be provided on what is meant by "proportionate" in terms of building enlargement? Eg % increase on volume? Criterion 5: what is meant by "harmful to local rural roads"? Does this mean congestion & safety? What about harm to local communities in terms of noise and vibration?	The Consultation Statement says it is for the development management process to interpret the term 'proportionate'. This would be preferable to an arbitrary threshold. Policy SG23 is modified replacing 'local rural roads' with: "road safety, residential amenities"
	Is there a policy gap for dealing with proposals for employment uses in the settlement that are not tourism related, for example infills or building conversions? Perhaps policy could be generally supportive (reflecting the Household Survey findings)	Not addressed.

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

General comments

Duplication of Policy Requirements

In the recent Burbage Examiner's Report it was recommended that where the NP makes reference to adopted Borough Council Local Plan policies, these should be removed as they repeat policy. This recommendation was agreed and taken forward. The NP is an opportunity to refine and add more detail to general policy requirements, particularly where local circumstances give reason to apply a general policy requirement differently. Sometimes, it will be appropriate to list relevant local circumstances or features that ought to be taken into account when applying a Local Plan policy. Such matters may be better set out in the supporting text with appropriate cross references to relevant policy. Duplication addressed by revisions to Policy SG17 (Community Facilities). Not addressed by policies SG2 (Housing Reserve Site), SG3 (Windfall Housing Development), SG5 (Affordable Housing) and SG6 (Countryside)

Evidence base

The need for evidence is outlined in Planning Practice Guidance and this sets out that proportionate, robust evidence should support the choices made and the approach taken. Planning policies need to be based on clear planning rationale and proper understanding of the place they relate to, if

they are to be relevant, realistic and to address local issues effectively. The data and analysis about a place is called the evidence base. This can include social, economic and environmental data.

The following comments relate to particular pieces of evidence:

Site Selection

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

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

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

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

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

HBBC comments are as follows: The RAG assessment has merit as a locally determined assessment of local preferences. But there will be questions over the subjective nature of the scoring and the detailed reasoning is not readily apparent. For example, how was it concluded that the Mulberry Farm site, including both the land with farm buildings the open land, should be scored Amber rather than Red in terms of impact on the designated Bosworth Battlefield? There is reference to the process of scoring being carried out at public meetings that were minuted, but the examiner will want to understand the scoring without having to trawl through minutes of several meetings. It would be better if the reasoning behind site scoring could be assembled in one place. Addressed in table above in paras 4.16 – 4.18. regarding Site Selection

Local Green Space Designation

There is no evidence of an assessment of the spaces identified as Local Green Space. LGS designations need to be justified against the criteria set out in paragraph 100 of the NPPF [nb Para 102 of July 2021 Revised NPPF]:

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

a) in reasonably close proximity to the community it serves;

b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and

c) local in character and is not an extensive tract of land'.

From the information provided it is not clear how the LGSs have been identified, scored and selected or how the LGSs relate to these three NPPF criteria and as a result the justification for these designations is questioned. The protection afforded to sites designated as Local Green Spaces is significant, consistent with Green Belt policy and therefore it is important to justify their designation. It appears from the information provided that the LGS designations do not yet have clear robust evidence to support their selection and designation. Addressed in table above in paras 7.1 – 7.3 and Policy SG16 Local Green Spaces

Renewable Energy

There is a blanket restriction of wind turbines in policy SG14. Can this supported by evidence as to why the Stoke Golding Designated Area is not an appropriate location for wind installations? Addressed in table above in paras 5.34 – 5.41 and Policy SG13 Renewable Energy

Mapping

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

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

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

Document Accessibility

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

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

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

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

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

Community Proposals

In the preparation of neighbourhood plans a number of Neighbourhood Plan Groups have highlighted non-planning issues or the need for community projects. There are a number of ways these can be included within a Neighbourhood Plan, Sheepy NDP included them as an Appendix whereas Burbage NDP included them as Community Action Points within the relevant document section. The Group may wish to see if there are any actions arising from the plan preparation which you wish to have more prominence similar to Burbage and Sheepy. For example local aspirations for improved bus services, traffic management and parking could be included. Addressed in table above in paras 9.1 – 9.12 Traffic & Transport

4. Stoke Golding NDP vs NPPF July 2021 Compliance Table

Table 2 below sets out how Hinckley & Bosworth Borough Council (HBBC) considers that the Stoke Golding 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)".

NDP Policy	Most relevant section of the NPPF (2021)	HBBC Submission Representation- Regard?
Policy SG1: Housing Requirement	Paragraphs 60-67	NPPF Para 60 says that it is important that a sufficient amount and variety of land can come forward where it is needed to support the Government's objective of significantly boosting the supply of housing. Para 67 makes clear that a local planning authority should provide an indicative housing requirement figure where it has not been possible to set a requirement figure. Footnote 33 explains the circumstances where this will be necessary including where the neighbourhood plan comes before the local plan and where the strategic housing policies of the local plan are out-of-date. HBBC considers that these circumstances apply (as explained further in section 5 below) and that the neighbourhood plan should be planning for the indicative population based figures provided by HBBC in July 2020 and revised in November 2020. Instead, the submitted neighbourhood plan housing requirement is based on the outdated strategic housing policies of the Core Strategy 2009. This is not consistent with the letter nor intentions of Paragraphs 60 – 67 of the NPPF (July 2021).
Policy SG2: Housing Reserve Site at Mulberry Farm, High Street	Paragraphs 61 and 78	NPPF policy expresses housing need in terms of minima to be provided for. Local Plans and Neighbourhood Plans should be expected to do likewise in terms of the dwelling capacities of site allocations. NPPF para 78 says that in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs. Mulberry Farm is a brownfield site within the settlement boundary of Stoke Golding (HBBC's Site Allocations Plan 2016) with no planning policy reason to resist the principle of housing development at present. As such, the neighbourhood plan proposed designation of Mulberry Farm as a reserve site effectively casts the site as a

NDP Policy	Most relevant section of the NPPF (2021)	HBBC Submission Representation- Regard?
		long-term option which could delay its development unnecessarily and as such this runs contrary to the intention of NPPF para 78 of supporting housing developments that reflect local needs. It would better accord with the NPPF if Mulberry Farm were made a housing allocation.
Policy SG3: Windfall Housing Development	Paragraph 69.c (Identifying Land for Homes)	The policy supports the development of housing on windfall sites within the settlement boundary and in other circumstances; therefore the policy is largely consistent with NPPF policies.
Policy SG4: Housing Mix	Paragraphs 60 and 62	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.
Policy SG5: Affordable Housing	Paragraphs 60, 62, 63, 64 and 65	The policy has appropriate regard to the NPPF
Policy SG6: Countryside	Paragraph 78 and 79 (Rural Housing) Paragraph 174	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 SG7: Area of Separation	Paragraphs 127 and 174	The NPPF acknowledges the importance of development reflecting the defining characteristics and special qualities of different areas and recognises the intrinsic character of the countryside.
Policy SG8: Green Infrastructure	Paragraphs 92, 175 and 186	The policy is considered consistent with the NPPF.
Policy SG9: Public Rights of Way Network	Paragraph 100	The NPPF expects planning policies to protect and enhance public rights of way. Policy SG9 seeks protection and enhancement from development proposals but could go further in identifying particular routes and locations where enhancement opportunities exist.

NDP Policy	Most relevant section of the NPPF (2021)	HBBC Submission Representation- Regard?
Policy SG10: Locally Important Views	Paragraphs 127 and 174	The NPPF acknowledges the importance of protecting areas of character and valued landscapes. Policy SG10 therefore needs to be backed up by explanations of what is valued in the views highlighted.
Policy SG11: Ecology and Biodiversity	Paragraphs 174, 175, and 179	Paragraph 179 states that plans should: 'Identify, map and safeguard components of local wildlife rich habitats and wider ecological networks'. Better mapping is needed to achieve this.
Policy SG12: Trees and Hedgerows	Paragraphs 131, 174 and 180	The policy is considered consistent with the NPPF.
Policy SG13: Renewable Energy	Paragraphs 152, 155 and 158	The policy is considered consistent with the NPPF.
Policy SG14: Features of Local Heritage Interest	Paragraphs 190, 194 and 203	Para 190 of the NPPF states: "Plans should set out a positive strategy for the conservation and enjoyment of the historic environment, including 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…" The policy is considered in general conformity with NPPF policies
Policy SG15: Design	Paragraphs 126, 127, 128, 133, and 134	The policy is considered in general conformity with NPPF policies
Policy SG16: Local Green Spaces	Paragraphs 101 and 102	To ensure conformity with the NPPF, evidence needs to demonstrate how the proposed local green space, Zion Baptist Church Allotments, meets the tests of paragraph 102.
Policy SG17: Community Services and Facilities	Paragraphs 84 and 93	Para 84 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 93 discusses similar aspirations for providing facilities and services to

NDP Policy	Most relevant section of the NPPF (2021)	HBBC Submission Representation- Regard?
		the community. Policy SG17 supports the retention of community facilities, and therefore the policy is considered in general conformity with NPPF policies
Policy SG18: Commercial, business and services uses in the Village Centre	Paragraphs 86 – 91	The policy is seeking to support the health and vitality of the village centre and, as such, is considered in general conformity with NPPF policies
Policy SG19: Infrastructure	Paragraphs 8, 28 and 73	Policy SG19 sets out a list of infrastructure improvements needed in the village. Whilst the policy could be clearer on priorities how it will be delivered, it is broadly in conformity with NPPF policy.
Policy SG20: Tourism	Paragraphs 84, 174 and 190	The policy seeks to promote development associated with tourism providing it is in respects the countryside and features of heritage. As such it is broadly in conformity with NPPF policy.
Policy SG21: Willow Park Industrial Estate	Paragraph 81	In safeguarding and promoting new business accommodation at Willow Park Industrial Estate, Policy SG21 is in conformity with NPPF policy.
Policy SG22: Business Conversion of Rural Buildings	Paragraph 85	The policy responds to the need for business accommodation in the countryside with appropriate criteria to safeguard interests of importance in conformity with NPPF policy.

5. Stoke Golding NDP vs Local Plan Compliance Assessment

The policies of Stoke Golding NDP are assessed against the relevant adopted plans of HBBC, which include the Core Strategy 2009 and the Site Allocations and Development Management Policies Plan 2016, and the draft Local Plan (Regulation 18) of July 2021

<u>Policies with major conformity issues</u>

Policy SG1: Housing Requirement.

The housing requirement for Stoke Golding of 57 dwellings is calculated by extrapolating the 3 dwellings per annum of the Core Strategy 2009 to the 19 year NDP plan period of 2020-39

Core Strategy 2009.

In articulating the spatial strategy paragraph 4.5 states that the majority of development will be accommodated in and around the Hinckley sub regional centre within the key urban area of the borough through sustainable amendments to the settlement boundary and two Sustainable Urban Extensions...It goes on to say that a proportion will also be distributed to the rural areas of the borough to accommodate their particular development needs.

Policy 11: Key Rural Centres Stand Alone. This sets a housing requirement of 60 dwellings for Stoke Golding. This equates to 3 dwellings per annum for the plan period of 2006 – 2026.

It is widely acknowledged that the housing strategy and requirement distribution of the Core Strategy is out of date.

Local Plan 2021

Of the growth options for the borough consulted on in 2019 the proposed strategy for the Local Plan is a hybrid that seeks to direct housing and economic growth to the urban areas of the borough, with proportionate growth in key rural settlements to maintain the vitality and viability of those centres and support the role they play in the rural area of the borough.

For each Key Rural Centres such as Stoke Golding there is a presumption to plan for a minimum of 200 dwellings to provide for managed growth and maintain the vitality and viability of those settlements and rural hinterland. The final minimum housing provision for each individual Key Rural Centre will take account of wider policy considerations, constraints on land supply and other wider strategic planning issues.

In July and November 2020 the Borough Council circulated to all parish and town councils and neighbourhood plan groups a table of indicative housing requirement figures based on the borough's housing requirement (from the standard method) apportioned to each area according to population. This generated a figure of 144 dwellings for Stoke Golding and with a 10% uplift recommended to all areas for increased resilience, this produced an indicative housing requirement figure for Stoke Golding of 157 for the 2020-39 period.

Conclusion

Policy SG1 is not in conformity with the emerging Local Plan. There is considerable divergence between the neighbourhood plan's housing requirement of 57 dwellings 2020-39 and the Local Plan requirement for a minimum of 200 dwellings for key rural centres such as Stoke Golding.

Policies with minor conformity issues

SG2: Housing Reserve Site at Mulberry Farm, High Street.

Issue: Duplication of HBBC policy (Criterion 9 with DM10 a) & b); Criterion 12 with DM7e and Criterion 13 with DM10h). Policy SG2 could make reference to emerging Local Plan Policy HO-02

SG3: Windfall Housing Development

Issue: Duplication of HBBC policy (Criterion 4 with DM5, Criterion 5 with DM14, Criterion 6 with DM15 and Criterion 7 with CS17)

SG5: Affordable Housing

Issue: Duplication with HBBC's Policy CS15. Rural exception site policy is also set out in Policy SG5. Emerging Local Plan Policy HO-10 is far more detailed in terms of development criteria and local connection requirements for occupiers

SG6: Countryside

Issue: Duplication with HBBC's Policy DM4. In the emerging Local Plan, Policy DM4 is proposed to be replaced with Policy PMD-04. The text of Policy SG6 could be amended as follows: "Subject to the caveats within the Hinckley & Bosworth ~~Site Allocations and Development Management DPD Policy DM4~~ local plan, the following types of development may be considered sustainable in countryside locations…."

Policies in conformity

SG4: Housing Mix

SG7: Areas of Separation

SG8: Green Infrastructure

SG9: Public Rights of Way

SG10: Locally Important Views

SG11: Ecology and Biodiversity

SG12: Trees and Hedgerows

SG13: Renewable Energy

SG14: Features of Local Heritage Interest

SG15: Design

SG16: Local Green Spaces

SG17: Community Services and Facilities

SG18: Village Centre

SG19: Infrastructure

SG20: Tourism

SG21: Willow Park Industrial Estate

SG22: SG22 Business Conversion of Rural Buildings.

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).

Stoke Golding undertook an SEA screening, in which it determined that a full SEA was required. This followed consultation with the Environment Agency, Natural England and Historic England, who determined that the Stoke Golding Neighbourhood Plan is likely to have significant environmental effects with particular regard to Bosworth Battlefield.

In regards to Habitat Regulations Assessment of the Stoke Golding Neighbourhood Plan it was determined that one is not required due to there being no adverse comments from the statutory consultation bodies and for the reasons set out in the Stoke Golding Strategic Environmental Assessment Screening Statement.

Below are HBBC's decision statements regarding SEA and HRA issued to the Qualifying Body on 15th April 2020 and the consultation responses received from the Statutory Bodies.

Hinckley & Bosworth Borough Council

Stoke Golding 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 (the "responsible authority"), on behalf of Stoke Golding Parish Council (the "responsible authority") to determine whether the Stoke Golding 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 Stoke Golding Neighbourhood Plan is likely to have significant environmental effects with particular regard to Bosworth Battlefield, and therefore, a Strategic Environmental Assessment (SEA) is 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 (Neighbourhood Planning webpage) or can be viewed during normal opening hours at:

Hinckley Hub
Rugby Road
Hinckley
Leicestershire
LE10 0FR

For further information, please email planningpolicy@hinckley-bosworth.gov.uk

Wednesday, 15th April 2020

Rachel Dexter

From: Fletcher, Clive <Clive.Fletcher@HistoricEngland.org.uk>
Sent: 21 January 2020 16:42
To: Rachel Dexter
Cc: Hendy, Bethany
Subject: STOKE GOLDING NEIGHBOURHOOD PLAN - SCREENING OPINION REQUEST

Dear Ms Dexter,
Thank you for your email asking for our screening opinion on the SEA for Stoke Golding Neighbourhood Plan.

For the purposes of consultations on SEA screening opinions, Historic England confines its advice to the question, "Is it likely to have a significant effect on the environment in respect of our area of concern, cultural heritage?". We note that the proposed site allocations (for up to 50 dwellings) are located within Bosworth Battlefield near to Crown Hill, where Henry VII was crowned after defeating Richard III. On the basis of the information supplied and in the context of the criteria set out in Schedule 1 of the Environmental Assessment Regulations [Annex II of 'SEA' Directive], Historic England is of the view that the preparation of a Strategic Environmental Assessment is likely to be required.

The views of the other statutory consultation bodies should be taken into account before the overall decision on the need for a SEA is made. If a decision is made to undertake a SEA, please note that Historic England has published guidance on Sustainability Appraisal / Strategic Environmental Assessment and the Historic Environment that is relevant to both local and neighbourhood planning and available at:

<https://historicengland.org.uk/images-books/publications/sustainability-appraisal-and-strategic-environmental-assessment-advice-note-8/>

I hope that this information is of use to you at this time.

Yours sincerely,

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

Historic England | The Axis, Birmingham B1 1TF www.HistoricEngland.org.uk

Hinckley & Bosworth
Borough Council

Stoke Golding 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 Regulation 102 of the Conservation of Habitats and Species Regulations 2010. 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 Stoke Golding 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 Stoke Golding Neighbourhood Plan Strategic Environmental Assessment Screening Statement.

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 during normal opening hours at:

Hinckley Hub
Rugby Road
Hinckley
Leicestershire
LE10 0FR

For further information, please email planningpolicy@hinckley-bosworth.gov.uk

Wednesday, 15th April 2020

Date: 03 February 2020
Our ref: 305704
Your ref: 1100/Neighbourhood Planning/NDP/Stoke Golding

Rachel Dexter
Senior Planning Officer (Policy)

BY EMAIL ONLY

NATURAL ENGLAND

Hornbeam House
Crewe Business Park
Electra Way
Crewe
Cheshire
CW1 6GJ

T 0300 060 3900

Dear Ms Dexter

Planning consultation: Stoke Golding Draft Neighbourhood Plan - screening assessment.

Thank you for your consultation on the above dated 14 January 2020 which was received by Natural England on 14 January 2020

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

Natural England welcomes the report *'Stoke Golding Neighbourhood Plan Draft Strategic Environmental Assessment Screening Statement'* (January 2020) for the Stoke Golding Neighbourhood Plan.

The screening opinion concludes that there is the potential for significant effects on the Kendall's Meadow Site of Special Scientific Interest (SSSI) located to the north of the Neighbourhood Area. The allocated housing site lies within the within the Impact Risk Zone (IRZ) of Kendall's Meadow SSSI.

IRZs are a GIS tool developed by Natural England to make a rapid initial assessment of the potential risks posed by development proposals to protected sites, including SSSIs. They define zones around each site which reflect the particular sensitivities of the features for which it is notified and indicate the types of development proposal which could potentially have adverse impacts.

Natural England has identified that the SSSI is particularly sensitive to residential dwellings of 100 or more dwellings outside of existing settlements. The proposed housing allocation and the proposed housing reserve site cumulatively propose around 50 dwellings

Based on the information submitted, Natural England considers that the proposed development will not damage or destroy the interest features for which the site has been notified. We would recommend that you seek clarification from the author on the conclusion of the report.

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

For any queries relating to the specific advice in this letter only please contact Sandra Close on 020 8026 0676. For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

Yours sincerely

SANDRA CLOSE

Planning Adviser
East Midlands Team