



Hinckley & Bosworth
Borough Council

Hinckley and Bosworth Borough Council Consultation Response to the Stoke Golding Neighbourhood Plan Review Pre-Submission Draft (Regulation 14)

Neighbourhood plans are not required to meet the tests of soundness which local plans and other development plan documents must meet. Instead, in order 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).

This consultation response aims to highlight where policies of the Stoke Golding NDP Review require modification in order to be in full conformity with the basic conditions, some matters for clarification, and/or where the LPA support/object.

Points (f) and (g) above relate to certain obligations which plans must adhere to, primarily in relation to habitats and environmental impacts, for example SEA.

Comments are provided below on the NDP policies which aim to ensure that the policies in their final form are workable and can be implemented to their full effect, ensuring that they contribute to the achievement of sustainable development.

This response has been put together by Planning Policy, with input from other key members of the Development Services department.

Policy reference / page number / section	HBBC comments
Section 1, page 6, Policy SG1	No comments, support the inclusion of this policy.
Section 3, page 10, para 3.5 – 3.6	Some plans require a Strategic Environmental Assessment and/or a Habitat Regulations Assessment. Stoke Golding NDP Review has undertaken an updated screening; all three statutory consultation bodies confirmed that the limited changes proposed to the plan do not require another full SEA to be undertaken. The LPA are content that this satisfies all SEA requirements and basic conditions at this stage.
Section 4, Page 12, Para 4.2	<p>At para 4.2 the plan states: <i>“As with the first Stoke Golding Neighbourhood Plan, the Borough Council is unable to provide an indicative housing provision for Stoke Golding Neighbourhood Area to 2039. Consequently, Stoke Golding Parish Council has undertaken its own assessment to provide an indicative housing requirement for the Neighbourhood Area.”</i></p> <p>For context, the LPA are unable to provide indicative housing figures for neighbourhood plan groups for a number of reasons:</p> <ul style="list-style-type: none"> • Standard Method figures, affordability ratios changing • The Leicester and Leicestershire Housing & Economic Needs Assessment (HENA): <ul style="list-style-type: none"> ○ The Statement of Common Ground is being considered by the Leicestershire partners, including Hinckley & Bosworth • National uncertainty for planning, no sign of the updates to the NPPF at the time of writing • Leicestershire awaits the outcomes of Charnwood Borough Council’s Examination in Public • The Hinckley & Bosworth Local Plan is not far enough advanced to delegate indicative housing figures to settlements <p>Affordability Ratios for 2022 can be viewed on the following link: https://www.pegasusgroup.co.uk/briefing-papers/2022-affordability-ratios/</p> <p>The Borough Council is also required to prepare and annually review an Action Plan, to show how the council is responding to the challenge of ensuring more homes are built in the Hinckley and Bosworth Borough and faster. In line with national planning practice guidance, it identifies the reasons for under-delivery and sets out measures the council intends to take to try and improve levels of delivery. You can view the latest Action Plan reports on the following link: https://www.hinckley-</p>

	<p>bosworth.gov.uk/info/856/local_plan_2006_to_2026/395/monitoring_and_land_availability/4</p> <p>Nevertheless, the Local Plan Regulation 19 document includes some helpful information for groups, for example the Housing Needs Study and the subsequent Rural Housing Numbers Methodology Statement. The Regulation 19 plan also sets the overall strategy for growth across the borough, closely adhering to the current adopted Local Plan settlement hierarchy of Urban settlements, followed by Key Rural Centres, followed by Rural Villages.</p> <p>Due to the increase in housing requirements, the Council will be looking to update the settlement hierarchy and required numbers in each settlement to ensure the Local Plan is delivering the appropriate amount of development at each level, but still aligning with our overarching strategy for growth.</p> <p>In terms of the Local Plan, there is outstanding work to be undertaken that is required in order to submit a sound and legally compliant plan to the Secretary of State. This includes working with our partners at Leicestershire County Council on highways/transport modelling, but also other evidence bases such as the Infrastructure Delivery Plan, the Infrastructure Capacity Study, and the Sustainability Appraisal. These are all critical to the success of the Local Plan at submission and EiP stage. The Council is also committed to the ongoing work to deliver both Sustainable Urban Extensions (SUEs) at Barwell and Earl Shilton.</p> <p>With the increase in the standard method figure, and the outcomes of the HENA and Statement of Common Ground (as outlined above), the Council are revisiting the housing and employment sections of the plan, including the preferred and alternative sites for allocation. The Council will be working with parishes and neighbourhood plan groups moving forward.</p> <p>It also worth noting that the NPPF is due to be updated following the Levelling-up and Regeneration Bill (LURB), and the NPPG will no-doubt follow. After which, neighbourhood plans should take account of any changes made.</p> <p>In lieu of the Council being unable to give Neighbourhood Plan groups a requirement figure, there are options that the groups can take to avoid delaying the preparation of their plan. It is reasonable for the groups to work towards their own housing figures as the basis of their strategy, housing policies and allocations. Other than minor comments on the delivery of housing and the explanation around the commitments (see below), the Council are content that Stoke Golding NP Review has considered how it will be meeting its housing need.</p>
Section 4, page 14, para 4.11 & 4.12	Please note, HBBC consider that a further apportionment of 102 dwellings per year (85 dwellings per year lower than the apportionment of 187) to be an initial justified apportionment of Leicester’s unmet need, however the additional 85 should be tested through their Local Plan work and through

	<p>further strategic work. The Statement of Common Ground is being deliberated by the Leicestershire partners, including Hinckley & Bosworth.</p> <p>Therefore, at this time, the Council consider that the figure of 659 dwellings per annum used as a basis for Stoke Golding's Neighbourhood Plan is appropriate.</p>
<p>Section 4, page 14, para 4.13</p>	<p>The plan states <i>“An additional flexibility allowance would not be necessary for Stoke Golding as there is considerable certainty that the large housing sites proposed for the village will come forward for development.”</i></p> <p>Would it be beneficial in this para to reference the map over the page (map 3), on page 15, and para 4.15? For example rephrase as follows:</p> <p><i>“An additional flexibility allowance would not be necessary for Stoke Golding as there is considerable certainty that the large housing sites proposed for the village will come forward for development, as referenced in para 4.15 and in map 3”.</i></p> <p>The explanation given by the Parish Council in the document called ‘Summary of the Key Revisions to the Plan’, linked here, under ‘Section 4 Housing’ is helpful, in particular the following paragraph:</p> <p><i>“On the supply side, the approval of the three major applications (Roseway, Wykin Lane and Hinckley Road) adds 190 homes to the housing supply and the Plan has been updated to reflect these approvals. The Mulberry Farm allocation (which will be retained) adds a further 25 homes, bringing the supply to 215. In addition, there will inevitably be some infill which will further increase the supply. Therefore, the allocations proposed for meeting the target of 213 homes are viable.”</i></p> <p>Another thing to note, the housing sites identified (particularly the three commitment sites at Roseway, Wykin Lane and Hinckley Road) I would anticipate to be coming forward within 5-10 years, in the first half of the plan period. How does the neighbourhood plan intend to deliver the required housing in the latter parts of the plan period? If this is through another review of the plan please could there be some commentary around this. Otherwise it would be good to see an explanation of the trajectory of delivery of sustainable housing throughout the plan period.</p> <p>In addition, it is worth noting that the NPPG, para 001, states (my emphasis added): <i>“The standard method for calculating local housing need provides a minimum number of homes to be planned for. Authorities should use the standard method as the starting point when preparing the housing requirement in their plan, unless exceptional circumstances justify an alternative approach.”</i> Has the neighbourhood plan had regard to the fact that a housing need is a minimum, and the neighbourhood plan can plan for more?</p>

Section 4, page 22, policy SG5	Policy SG5 – as there is limited evidence provided to justify the restriction on the types of market housing, the council wouldn't support this at this time. In particular it is important to note that 4+ bedroom properties can provide more than just the typical family home, i.e. more bedrooms can serve elderly/disabled family members who require care, or for younger members of the family needing to live at home longer in order to save to buy their own home, for example.
Section 4, page 22, para 4.31	The most up to date information on Self-Build and Custom Build is on the council's website here . This states that there are currently 37 individuals on the register. One individual specifically mentions Stoke Golding/Dadlington as a preferred area of interest, however there are many entries that state they are flexible on location but would prefer a rural setting, of which Stoke Golding is.
Page 22, Para 4.33	<p>Comment from the Strategic Housing Enabling Officer:</p> <p>For para 4.33 could you please just add "for rent" i.e. "<i>To apply for council and housing association properties for rent local people need to apply to go on Hinckley and Bosworth Borough Council's Housing Register.</i>"</p>
Section 5, pages 26 & 27, Policy SG7	Just one matter for clarification on Policy SG7 Areas of Separation – the term "inappropriate uses of land" is not defined anywhere in the policy or supporting text (para's 5.8 & 5.9). Does this follow the similar intentions of Policy SG6 Countryside? Or are there different inappropriate uses in the area of separation?
Section 5, page 33, Policy SG11	Support the strengthening of Policy SG11 through increase evidence provided in Appendix 1.
Section 7, page 54, para's 7.1 – 7.3 & Policy SG17 Local Green Spaces	<p>Please could it be made clearer where the evidence supporting the choice/designation of Local Green Spaces is held on the Parish Council website please? In addition, the names of the sites don't seem to match between the plan itself, the 'Summary of the Key Revisions to the Plan' document here, the main NP evidence page here, and the 2023 revisions page here.</p> <p>There are LGS assessment toolkits are available for the sites, here, here and here, but it could be made clearer.</p> <p>In addition, are the available assessments up to date? For example, for the Hinckley Road LGS it states that the owner is being consulted, but the response is unknown as there has been no prior consultation.</p> <p>Sites B and C on map 12 are also covered by the areas of separation policy, meaning two restrictive policies are covering the same area. If an application was to come in for somewhere in this area, how does the NP intend for the case officer to apply both policies? Local Green Space policies are intended to be strict (similar to Green Belt); the policy states</p>

	<p>that development will only be supported in very special circumstances. Whereas the area of separation policy (SG8) only applies where development proposals adversely affect the open character of the area or the character and setting of Dadlington or Stoke Golding villages. Some clarity around this would be appreciated.</p>
<p>Numerous</p>	<p>Comments from the Conservation Officer:</p> <p>I raise no concerns with the proposed revisions to the document that affect heritage assets, namely:</p> <ul style="list-style-type: none"> - The changes to the settlement boundary with the paddock to the rear of the White Swan (which is designated Battlefield land) being moved outside the settlement boundary. - The description of the locally important views and photos provided in Appendix I to support Policy SG11 - Locally Important Views - Inclusion of areas of ridge and furrow as locally valued (non-designated) heritage assets in Section 6 and Policy SG15.
<p>Section 10, Pages 67, 68 and 70.</p>	<p>Comment from Principal Economic Development Officer:</p> <p>Small comment re the boundary for Willow Park Industrial Estate, page 70, the boundary cuts through some buildings towards the front of the site, and doesn't encompass all buildings. Does the plan need to explain the reasons for this in paras 10.12 – 10.13 in the event that there are applications that straddle the boundary or on the buildings outside of the boundary and the case officer requires clarification.</p>