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Dear Mr Collison,

Independent Examination of the Dadlington Neighbourhood Development Plan

Thank you for your initial letter of 22 August setting out how the Independent Examination will be conducted. The contents are noted.

In respect of the Regulation 16 representations, the Parish Council would like to make the following comments.

As required under Part 5, Section 14 of the Neighbourhood Planning (General) Regulations 2012, the Parish Council undertook a pre-submission consultation on the proposed Neighbourhood Plan. This took place between 26 February and 8 April 2024, and a summary of the representation received, along with the Parish Council's response, is set out in Appendix 3 of the Parish Council's Consultation Statement. Some of the Regulation 16 representations, particularly those of Leicestershire County Council, simply repeat their earlier submissions so the Parish Council has no more to add at this stage.

Dadlington and Sutton Cheney Parish Council approved the submission version of the Dadlington Neighbourhood Plan on 14 November 2024 and the Plan, along with other documentation, was formally submitted to Hinckley and Bosworth Borough Council on 14 January 2025. During this period the National Planning Policy Framework (NPPF) was updated (12 December 2024) and this fact is reflected in paragraph 1.7 of the submitted Neighbourhood Plan. Annex 1 of the NPPF sets out transitional arrangements and paragraph 239 make it clear that the policies in the 2024 NPPF do not apply to the Dadlington Neighbourhood Plan as it was submitted before 12 March 2025. The Parish Council therefore agrees with the Examiner that the Independent Examination should be undertaken in the context of the National Planning Policy Framework published on 20 December 2023. It follows that representations referring to the 2024 NPPF may not be relevant.

Similarly, a great deal of time has elapsed between submission and your appointment, though it unclear why it has taken the Borough Council so long to reach this stage. Notwithstanding, it is inevitable that some references in the Draft Plan may be out of date. This includes Draft Neighbourhood Plan paragraphs 1.14 to 1.17 which refer to the emerging, new Hinckley and Bosworth Local Plan although, fundamentally, the status of the new Local Plan has not changed.

Local Green Space

Policy D1 identifies three Local Green Spaces: The Church of St James the Greater Churchyard, The Green and Ballis Hole. Draft Neighbourhood Plan paragraphs 4.2-4.6 summarise the significance of each Local Green Space and why they are important to local people. Further evidence is provided on the Parish Council's website. Each Local Green Space meets the requirements for designation. References to Site Allocations and DM Policies DPD (SADMP) Policy DM8 are largely irrelevant as the SADMP was adopted some years prior to the introduction of the Local Green Space designation in the 2012 NPPF.

Area of Separation

The justification for Policy D2 is set out in Draft Neighbourhood Plan paragraphs 4.7 and 4.8 which makes it clear that the communities of both Dadlington and Stoke Golding agree that the maintenance of the separation of the built-up areas is crucial to the identities of the settlements. It is clear from the Borough Council's <u>Strategic Housing and Economic Land Availability Assessment</u> and the representation on behalf of Mrs Margaret Croxall that the separation of the two settlements is at risk.

The precise boundary of the "area of separation" has emerged through the plan-making process and has taken account of the Area of Separation designated by the Stoke Golding Neighbourhood Plan (Policy SG8).

Seeking to prevent development that adversely affects the character of an area is not the same as preventing any development in that area. Sustainable development could occur in the area identified as 'areas of separation' that does not undermine the open character of the area or the character and setting of Dadlington and Stoke Golding. The policy seeks to shape and direct sustainable development to ensure that local people get the right type of development for their community.

Policy D2 makes no reference to 'inappropriate uses'.

Landscape and Locally Important Views

In the 2021 Questionnaire, local people were invited to identify important views of the local landscape. There were lots of suggestions for views that people valued, the most important are set out in Draft Neighbourhood Plan Policy D3 and Map 3, justified by paragraphs 5.10 to 5.15 and Appendix 1.

Policy D3 is clearly written and unambiguous, so it is evident how a decision maker should react to development proposals.

Design

The Draft Neighbourhood Plan makes appropriate reference to Hinckley and Bosworth Borough Council's Good Design Guide Supplementary Planning Document (SPD) at paragraphs 9.2 and 9.3. However, while the Neighbourhood Plan must be in general conformity with the strategic policies contained in the development plan for the area, it is not required to be in conformity with SPD.

Housing

The Hinckley and Bosworth Core Strategy identifies Dadlington as a Rural Hamlet and development will be limited, for example infill housing development and the conversion of agricultural buildings. The emerging Local Plan continues to identify Dadlington as a Rural Hamlet, and it is not considered to be a sustainable location for further growth.

During the preparation of the Neighbourhood Plan, consideration has been given to the allocation of a housing site(s). However, the Parish Council has concluded that the allocation of a housing site is not currently appropriate for the following reasons:

- Hinckley and Bosworth Borough Council is unable to provide an indicative housing provision for the Neighbourhood Area;
- A housing allocation may not be in conformity with Dadlington's status as a Rural Hamlet;
- Environmental constraints such as the Registered Battlefield and the community's aspirations for an Area of Separation between Dadlington and Stoke Golding make it difficult to identify suitable sites; and
- Land ownership considerations.

By not making a housing allocation, the Parish Council recognises that the Neighbourhood Area will not benefit from the limited protections offered by NPPF paragraph 14.

To clarify where infill development would be acceptable, the Draft Neighbourhood Plan defines a settlement boundary for Dadlington (Map 9). The starting point was the Settlement Boundaries defined by the SADMP, but the new boundaries have evolved through the plan-making process. To ensure consistency, the Parish Council has adopted a methodology that broadly ensures that open areas of countryside (agricultural land, paddocks, meadows, woodland, rivers and lakes, and other greenfield land)- will continue to lie outside the settlement boundary:

- Where possible, the boundary should follow a defined feature that is visible on-site and on an OS plan e.g. field boundary, building, road, stream, wall or fence.
- Boundaries should generally follow the curtilage of properties. Occasionally the curtilage of the property is not well defined or so large that it appears to form part of the countryside surrounding the settlement. In these cases, the boundary should be defined to protect the landscape setting of the settlement.
- Isolated or sporadic development which is clearly detached from the principal built-up area should be excluded from within the boundary.
- The settlement boundary excludes agricultural buildings unless they are well related in terms of scale and positioning to the rest of the settlement, especially if the buildings have been converted to residential or non-agricultural use. Account has also been taken of the availability of defensible boundaries and how compatible the building is with neighbouring properties.

Draft Neighbourhood Plan paragraphs 10.11 to 10.14 make it clear that the needs of younger people who want to live in Dadlington are not being met by the current housing stock. The Parish Council recognises that the opportunity for new housing will be limited but is keen to ensure that where those opportunities do arise, new homes are suitable for younger people and first-time buyers.

Conclusion

The Parish Council would like to thank you for the opportunity to respond to the Regulation 16 representations and will be happy to respond to any further questions or issues that you may have.

Yours sincerely,

Hannah Pickles

Clerk to the Council