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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	<b>Noted</b>
Para 1.6	<p>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.</p> <p>Hyperlink goes to Schedule 9 of the Localism Act 2011 when the basic conditions are set out in <a href="#">Schedule 10</a> (8(2)).</p>	<p>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.</p> <p>Hyperlink revised</p>	<b>Noted</b>
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	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.	<b>Noted</b>

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	<p>plan. As such, paragraph 1.33 is not strictly necessary for decision making.</p> <p>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.</p> <p>HBBC suggests the paragraph is either deleted or caveated to recognise other material considerations and the planning balance. Replacing "...will be applied." With "...will be considered" would help.</p>		
Vision. P11.	Concise easy to understand infographic of the SGNP vision.	Support noted.	<b>Noted</b>

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Paras 4.11 – 4.12 housing requirement	<p>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</p>	<p>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.</p> <p>HBBC does not consider this approach is appropriate for a number of reasons:</p> <ol style="list-style-type: none"> <li>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</li> </ol>	<p><b>See Housing Note</b></p>

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	<p>apportioning this across the borough by population.</p> <p>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</p>	<p>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 housing delivery are different to that when the Core Strategy was adopted in 2009.</p> <p>2. Until HBBC's local plan is sufficiently advanced to provide a</p>	

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	<p>unmet housing need from the city of Leicester.</p> <p>Borough population 111,370</p> <p>Stoke Golding population 1,861</p> <p>Percentage 1.7%</p> <p>Borough Need 8,588</p> <p>1.7% to Stoke Golding 144</p> <p>10% uplift 9,447</p> <p>1.7% to Stoke Golding 158</p> <p>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</p>	<p>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</p>	

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	<p>considered a sensible approach in advance of a figure being provided through the emerging Local Plan.</p> <p>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.</p> <p>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</p>	<p>that is most appropriate for Stoke Golding.</p> <p>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</p> <p>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 housing</p>	

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	<p>Leicester. Whilst work is ongoing across Leicester and Leicestershire to agree a method of apportioning this unmet need it is possible that the 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.</p>	<p>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</p>	
4.12 plan period	<p>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</p>	<p>Paragraph 4.13 has been updated to reflect this point.</p>	<p><b>Noted</b></p>

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	both annual requirements and housing completions for the <i>preceding period</i> should not be included.		
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.	<b>See Housing Note</b>
4.13	Paragraphs 4.13. Past completions prior to April 2020 should not count towards	Paragraph 4.13 has been updated to remove reference to developments completed prior to April 2020 and	<b>Noted</b>

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	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.	add reference to the development at East of Roseway that was approved recently.	
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.	<b>Noted</b>
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	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	<b>See Housing Note</b>

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	remainder to be met by allocations.	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.	<p>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.</p> <p>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.</p> <p>Potential supply options:</p> <table data-bbox="799 1027 1301 1161"> <tr> <td>East of Roseway:</td> <td>65</td> </tr> <tr> <td>Wykin Lane</td> <td>55</td> </tr> <tr> <td>Windfall allowance</td> <td>51</td> </tr> <tr> <td>Total</td> <td>171</td> </tr> </table> <p>The Mulberry Farm site offers potential for further flexibility in case windfall delivery does not materialise as forecast.</p>	East of Roseway:	65	Wykin Lane	55	Windfall allowance	51	Total	171	<b>See Housing Note</b>
East of Roseway:	65										
Wykin Lane	55										
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Total	171										

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Paras 4.16 – 4.18. Site Selection	<p>Comments made on pre-submission plan evidence.</p> <p>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</p>	<p>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.</p>	

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	behind site scoring could be assembled in one place.		
Para 4.19 and Policy SG2 Mulberry Farm	<p>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.</p> <p>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?</p> <p>Criterion 1: the policy needs to be clear on the minimum number of dwellings achievable</p>	<p>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</p>	<p><b>See Housing Note</b></p>

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	<p>Criterion 2: unnecessary duplication. Can rely on Policy SG5 without repetition here</p> <p>Criterion 3: the Examiner will want to know if access is possible off High Street. Has the highway authority given an opinion?</p> <p>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.</p> <p>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</p>	<p>of the historic Bosworth battlefield. As such, is there any reason in principle to hold the site back for future development as implied by designation as a reserve site?</p> <p>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.</p> <p>Regarding the policy criteria, only some of the concerns raised at pre-submission stage have been addressed:</p>	

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	<p>will be required for the planning application. An assessment of street scenes and heritage would be more appropriate than a LVIA.</p> <p>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?</p> <p>Criterion 12: Duplicates the Preventing Pollution policy (DM7e) of HBBC's Site Allocations and DM Policies Plan 2016</p> <p>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?</p>	<p>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.</p> <p>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).</p> <p>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 as the principle of development will be established by its designation.</p>	

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		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	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 up to 55 dwellings at Wykin Lane. If this is included in the supply Mulberry Farm becomes optional. However, the development of	<b>See Housing Note</b>

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	<p>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.</p> <p>Housing requirement - 158</p> <p>Windfall allowance 51 - 107</p> <p>East of Roseway 65 - 42</p> <p>Stokesfield Farm 25 - 17</p> <p>Mulberry Farm 25? +8</p> <p>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</p>	<p>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.</p> <p>Housing requirement -158</p> <p>Windfall allowance 51 -107</p> <p>East of Roseway 65 -42</p> <p>Wykin Lane 55 +13</p>	

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	applications in the future that the NP could influence.		
Deletion of Pre-Submission Draft Policy SG3 Reserve Site Stokesfield Farm	<p>Paragraphs 4.21 – 4.22 and Policy SG3 Reserve Site Stokesfield Farm.</p> <p>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.</p> <p>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.</p>	<p>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.</p>	<p><b>See Housing Note</b>  <b>The Qualifying Body is prepared to support modifications which would allow a minimum housing requirement of 158 dwellings to be met. This includes a 10% additional buffer, using the Borough Council’s preferred methodology. Windfall development provides additional flexibility. The release of part of Stokesfield Farm, even as a Reserve Site, is therefore unnecessary.</b></p>

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	<p>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:</p> <p>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.</p>		

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	<p>Criterion 1: policy needs to be clear on the <i>minimum</i> number of dwellings achievable</p> <p>Criterion 2: unnecessary duplication. Can rely on Policy SG5 without repetition here</p> <p>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.</p> <p>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.</p>		

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	<p>This should be left to the statutory consultee. The criterion should just state than an archaeological assessment may be required.</p> <p>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.</p> <p>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.</p>		

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	<p>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?</p> <p>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.</p> <p>Criterion 10: Duplicates the Development and Design policy (DM10h) of HBBC's Site</p>		

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	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.	<b>Map Title does not need to be changed as Map 3 addresses the housing policies of the plan.</b>
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?	<b>It makes no sense to exclude the land to the east of 77 Roseway given the Borough Council's approval of 65 dwellings on land east of Roseway.</b>

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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.	<b>1:2500 is an acceptable scale for planning applications and is fine here.</b>
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	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	<b>We believe that the full list of housing development types that are appropriate outside the settlement Boundary, along with appropriate cross-referencing is helpful to the reader. We also note that the relevant Site Allocations and Development Management Policies are out of date.</b>

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	<p>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.</p> <p>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.</p> <p>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</p>	<p>local plan policies have not been accepted.</p>	

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	<p>supported with the exception of the instances specified in Policy SG4 and the exceptions allowable under Local Plan policies:</p> <ul style="list-style-type: none"> <li>• Rural worker accommodation (Policy DM5)</li> <li>• Replacement dwellings (Policy DM14)</li> <li>• Re-use and adaption of redundant rural buildings (DM15) and</li> <li>• Exception sites for affordable housing (CS17)”</li> </ul>		
<p>4.24 – 4.29 and Policy SG4 Housing Mix. Meeting Local Housing Needs and Needs of Older People</p>	<p>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 (<a href="https://www.hinckley-bosworth.gov.uk/info/1004/plan ning_policy_and_the_local_pla">https://www.hinckley-bosworth.gov.uk/info/1004/plan ning_policy_and_the_local_pla</a>)</p>	<p>The submission NP includes updated text and data from the later evidence.</p>	<p><b>Noted</b></p>

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	<p><a href="#">n/1610/housing_needs_study_2020</a>)</p> <p>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. .</p>		
5.30 – 5.32 Self-Build	<p>Paragraphs 4.31 – 4.33</p> <p>The data in paragraph 4.33 could be updated to state that at 30<sup>th</sup> 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.</p> <p>Is it assumed that the NDP will defer to the local plan on self-build policies?</p>	<p>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.</p> <p>Reference should be made to emerging Local Plan Policy HO-06</p>	<p><b>The emerging new Local Plan can only be attributed very limited weight at this stage.</b></p>

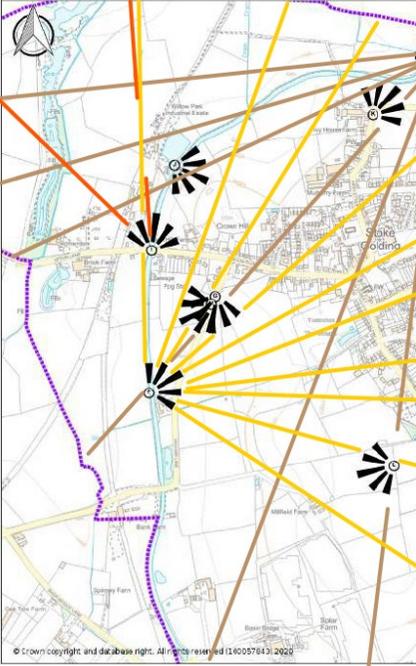
Submission Policy reference / Page number	HBBC Regulation 14 comments (reference to page numbers and policies in the Regulation 14 Pre-Submission Version)	HBBC Regulation 16 Comments	Qualifying Body Response
4.33 – 4.35 and Policy SG5 Affordable Housing	<p>Paragraphs 4.34 – 4.36 and Policy SG6.</p> <p>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 <i>all</i> affordable housing provided in Stoke Golding to be subject to a 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 <i>within</i> the Settlement Boundary. It is generally the case that to be</p>	<p>Duplication with HBBC’s Policy CS15 remains.</p> <p>The application of the policy concerning rural exception developments to areas within the settlement boundary does not make sense</p> <p>HBBC does not object to the local connection aspects of the policy being different to HBBC’s policy.</p>	<p><b>Core Strategy policies CS15 (Affordable Housing) is out of date as its threshold of 4 dwellings or more (or 0.13 ha or more) does not comply with NPPF paragraph 64 which requires that provision of affordable housing should not be sought for residential developments that are not major developments, other than in designated rural areas. Stoke Golding is not a designated rural area. Exception site affordable housing can be delivered within settlements where land is protected for other uses.</b></p>

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	<p>“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.</p> <p>Duplication would be reduced if:</p> <ul style="list-style-type: none"> <li>i) the supporting text made cross reference to Local Plan policy requirements for affordable housing and</li> <li>ii) Policy SG6 were reworded to set out only the aspects of the affordable housing requirement that are different in Stoke Golding.</li> </ul>		

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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	<b>Site Allocations and Development Management Policies are out of date.</b>
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 proposal...” implies development can acceptable in principle providing that location, design and landscaping is acceptable.	Policy strengthened by deletion of final sentence and reference to the East of Roseway permission in the supporting text.	<b>Noted</b>

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	Qualifying Body Response
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.	<b>Leicestershire County Council is required to maintain a definitive map and statement of public rights of way in Leicestershire. Only the Definitive Map provides current, conclusive evidence of the existence of a right of way. Figure 9 is taken from the County Council's website <a href="https://www.leicestershire.gov.uk/leisure-and-community/parks-and-outdoor-activities/where-to-walk-in-leicestershire">https://www.leicestershire.gov.uk/leisure-and-community/parks-and-outdoor-activities/where-to-walk-in-leicestershire</a> and is not the Definitive Map and is for guidance only. Opportunities to improve the rights of way network can only be taken where development presents itself.</b>
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	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 LVIA's but paragraph 5.26 still refers to "large developments"	<b>Supporting evidence to be updated.</b>

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	<p>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 <a href="#">Landscape Character Assessment</a>.</p> <p>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.</p>	<p>The supporting evidence ought to be updated to provide context and explanation of what is thought valuable in the 7 key views.</p>	

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	<p>Locally Important Views</p> <p>Map 7</p>  <p>5.26. This paragraph requires a Landscape and Visual Impact Assessment (LVIA) for “large developments” and “proposals that are likely to impact on</p>		

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	<p>Locally Important Views". To avoid uncertainty about when LVIA's 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 defined in Government regulations could be an alternative to "large" which would otherwise need to be explained.</p> <p>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</p>		

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	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	<p>Paragraphs 5.27 – 5.29, Policy SG12 and Map 6.</p> <p>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.</p> <p>BAP Priority Habitats is referenced in the Policy but not explained in the supporting text.</p> <p>“Midlands’ style” hedge laying is referenced in the Policy but</p>	<p>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.</p>	<p><b>The reference to BAP Priority Habitats was a recommendation of the SEA Report. The term “Midlands’ style” hedge laying is used in the Hinckley and Bosworth Borough Landscape Character Assessment and Planning Committee reports: <a href="https://moderngov.hinckley-bosworth.gov.uk/documents/s12994/20-00347-REM%20-%20Peckleton%20Lane%20-%20SW.pdf">https://moderngov.hinckley-bosworth.gov.uk/documents/s12994/20-00347-REM%20-%20Peckleton%20Lane%20-%20SW.pdf</a> Map 6 shows the Local Wildlife Sites.</b></p>

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	not explained in the supporting text.		
5.30 – 5.33 and Policy SG12 Trees and Hedgerows	<p>Paragraphs 5.30 – 5.33 and Policy SG13</p> <p>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 directed instead. Such locations would need to be agreed with the landowner and clearly mapped. Supporting evidence can be taken from the <a href="#">Green Infrastructure Strategy</a>.</p>	<p>The comment on the pre-submission draft NP was made as an optional suggestion</p> <p>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.</p>	<b>Noted</b>

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5.34 – 5.41 and Policy SG13 Renewable Energy	<p>Paragraphs 5.34 – 5.41 and Policy SG14. Regarding the criteria of SG14 for solar farms,</p> <ol style="list-style-type: none"> <li>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?</li> <li>3. Important grammatical nuance. As currently worded “sensitively” applies to the <i>process</i> of selecting land. Suggest rewording to require the location to</li> </ol>	<p>Wording changed to reflect location of solar farms being sensitive to the character of the landscape.</p> <p>The previously raised concern about the practical availability of brownfield and non-agricultural land is not significant as the clause says “wherever possible”.</p>	<b>Noted</b>

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	<p>be sensitive to the landscape.</p>		
<p>5.34 – 5.41 and Policy SG13 Renewable Energy</p>	<p>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?</p>	<p>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</p>	<p><b>National planning policy allows local people to have the final say on wind farm applications. In the 2017 Questionnaire, 56% of respondents were against wind turbines. The Markfield Neighbourhood Plan Examiner largely ignored PPG Paragraph: 033 Reference ID: 5-033-150618. Policy SG13 is helpful in that it is clear that the local community does not consider the landscape around Stoke Golding as suitable for hosting wind</b></p>

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		adequately made. Evidence of such justification has not been provided for the Stoke Golding NP either.	<b>turbine installations, therefore the LPA does not need to make a judgement on the matter.</b>
Para 6.10	Paragraph 6.10 reference to Map 9 should be to p46	Reference corrected	<b>Noted</b>
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.	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.	<b>Noted</b>

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	<p>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.</p>	<p>Commitment given to update the supporting evidence to explain the importance of heritage assets.</p> <p>No policy protection has been introduced to protect ridge and furrow fields as suggested by HBBC.</p>	

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	<p>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?</p> <p>Also the extent of the turnpike road (BB) is not very clear on the Policies Map (pages 66 and 67) whilst the position 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).</p> <p>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-</p>		

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	<p>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</p> <p>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.</p> <p>Map 9. The map could be made more legible if the area boundaries were better differentiated. One option</p>		

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	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	<p>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 historic environment. In the policy text after the word <i>protect</i> in limbs 2, 6i and 6ii consider adding to this so it reads <i>protect and where possible enhance...</i></p> <p>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?</p>	No changes have been made in response to HBBC’s suggestions.	<b>Policy SG15: Design concerns the creation of well-designed buildings and spaces. It is not just about heritage though it does require developments to respect the prevailing character of the area.</b>

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7.1 – 7.3 and Policy SG16 Local Green Spaces	<p>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:</p> <ul style="list-style-type: none"> <li>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</li> <li>ii) SGNP Site I (St Martins Allotments) is narrower than SADMP STG13 having included land in site H instead</li> <li>iii) SGNP Site J (Laburnam Gardens) appears to be a much smaller part of SADMP</li> </ul>	<p>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</p> <ul style="list-style-type: none"> <li>a) in reasonably close proximity to the community it serves;</li> <li>b) demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and</li> <li>c) local in character and is not an extensive tract of land’.</li> </ul>	<p><b>The LGS designation form for the Zion Baptist Chapel allotments is available separately on request from the Parish Clerk: <a href="mailto:clerk.stokegoldingpc@gmail.com">clerk.stokegoldingpc@gmail.com</a></b></p>

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	<p>iv) STG05 (High Street Allotments) 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)</p> <p>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 Local Green Space designation should only be used where the green space is:</p>		

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	<p>a) in reasonably close proximity to the community it serves;</p> <p>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</p> <p>c) local in character and is not an extensive tract of land'.</p> <p>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.</p>		

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8.1 – 8.2 and Policy SG17 Community Services and Facilities	<p>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.</p> <p style="text-align: center;"><u>Stoke Golding Plan</u>  Facility _____ SADM  Plan Ref</p> <p>A. St Margarets CE Primary School  STG19</p> <p>B. Stoke Golding Surgery  STG22</p>	<p>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:”</p> <p>This ensures that the spaces and shop in the list of facilities are offered protection under the appropriate HBBC policies.</p>	<b>Noted</b>

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	<ul style="list-style-type: none"> <li>C. Stoke Golding Recreation Ground STG10 (DM8)</li> <li>D. Village (Sehmbi) convenience store STG15N (DM22)</li> <li>E. Village Pubs               <ul style="list-style-type: none"> <li>a. The George &amp; Dragon</li> <li>b. The Three Horseshoes</li> <li>c. The White Swan</li> <li>d. Stoke Golding Club</li> </ul> </li> <li>F. Community Halls               <ul style="list-style-type: none"> <li>a. The Baxter Hall  STG18</li> <li>b. Methodist Hall  STG20</li> <li>c. Village Hall  STG21</li> <li>d. Stoke Golding Club</li> </ul> </li> </ul>		

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	<p>G. Places of Worship</p> <p>    a. St Margarets Church         STG17</p> <p>    b. Methodist Church         STG20</p> <p>    c. Zion Chapel         STG16</p> <p>H. Allotments         STG03, 05, 13 (DM8)</p> <p>Policy SG18 needs to be reworded to either:</p> <p>    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</p>		

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	<p>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)</p>		
<p>8.3 – 8.10 Education and Stoke Golding Surgery</p>	<p>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</p>	<p>Date references added.  No cross reference to Policy SG20 to link school and GP capacity issues with infrastructure policy</p>	<p><b>Paragraph 8.37 states that ‘The Education Authority and West Leicestershire Clinical Commissioning Group have already indicated that developer contributions may be required.’</b></p>

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	<p>time reference to the statement would be helpful, for example, "At 2020 the school was oversubscribed."</p> <p>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.</p>		
8.11 – 8.12 and Policy SG18 Village Centre	<p>Paragraph 8.11 and Policy SG19.</p> <p>Regarding Paragraph 1 of Policy SG19. SADM Plan policy DM22 and map on p.89</p>	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.	<b>Noted</b>

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	<p>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 small scale shops / services for the use of the local community. Questions are:</p> <ul style="list-style-type: none"> <li>i. If "Village Centre" means the same defined area as Neighbourhood</li> </ul>		

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	<p>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.</p> <p>ii. What is exactly meant by the verbs “maintain” and “enhance”? Do they</p>		

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	<p>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</p>		

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	<p>Plan anticipates any future expansion of the defined centre, could the location(s) for this be shown on the map?</p> <p>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 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 <i>where</i> would such proposals be supported ought to be made clear. The defined Village/Neighbourhood Centre</p>		

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	<p>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.</p> <p>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</p>		

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	<p>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.</p> <p>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 possible to word Paragraph 2 so that this part of paragraph 3 would be unnecessary.</p> <p>The other element of paragraph 3 says that proposals that could lead to an</p>		

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	<p>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?</p> <p>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.</p> <p>Many questions have been raised about how Policy SG19</p>		

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	<p>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.</p>		
8.34 – 8.35 Superfast broadband	<p>Paragraphs 8.34 – 8.35</p> <p>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 employment development. Appropriate cross references to these policies should then be made in paragraphs 8.34-35.</p>	<p>The Consultation Statement clarifies that superfast broadband is already available throughout most of Stoke Golding.</p>	<p><b>Noted</b></p>
8.36 – 8.38 and Policy SG19 Infrastructure	<p>Paragraphs 8.36 – 8.38 and Policy SG20</p>	<p>Suggested rewording to clarify developer contribution requirements have not been undertaken.</p>	<p><b>Community infrastructure improvements will depend upon the scale and nature of the development proposed and prioritisation may vary over time.</b></p>

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	<p>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."</p> <p>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</p>	<p>The suggestion to itemise and prioritise infrastructure needs has not been accepted.</p> <p>It is noted that the government is poised to reform the system of contributions.</p>	<p><b>The Planning for the Future consultation proposes many reforms of the planning system. They are too early in preparation to be a significant consideration.</b></p>

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	<p>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?</p> <p>Also, the policy applies to <i>major</i> 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 could be used: "Developments of new dwellings and other major development...."</p>		

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	<p>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?</p> <p>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?</p> <p>Are there any particular road related improvements envisaged as necessary in the village to control speed or</p>		

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	<p>volume of traffic generated by major housing developments?</p> <p>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"</p>		
9.1 – 9.12 Traffic & Transport	<p>Paragraphs 9.1 – 9.12 .</p> <p>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 scope of planning (as stated in</p>	<p>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.</p> <p>The Consultation Statement also considers that anticipated</p>	<b>Noted</b>

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	<p>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.</p> <p>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.</p>	<p>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.</p>	

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10.1 – 10.11 Policy SG20 Tourism	<p>Paragraphs 10.1 – 10.11 and Policy SG21</p> <p>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.</p> <p>In practical terms how will proposals for tourism facilities that have no demonstrable association with the battlefield and canal be considered?</p>	<p>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.</p>	
10.12 – 10.13, Policy SG21 and Map 13 Willow Park Industrial Estate	<p>Paragraphs 10.12 – 10.13 and Policy SG22.</p> <p>Para 10.12: correct the page reference to Map 12.</p> <p>Para 10.13: the Employment Land and Premises Study was updated to 2020 so the</p>	<p>Paragraph references updated</p> <p>Helpful additions made to Policy SG21 specify what types of business use would be appropriate and other provisos.</p>	<p><b>Qualifying Body would support removal of the dwellings from the Willow Park Industrial Estate designation.</b></p>

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	<p>reference to 2013 needs to change to 2020.</p> <p>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</p>	<p>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.</p>	

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	<p>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.</p>		
<p>10.14- 10.15 and SG22 Business Conversion of Rural Buildings</p>	<p>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 &amp; safety? What about harm to</p>	<p>The Consultation Statement says it is for the development management process to interpret the term ‘proportionate’. This would be preferable to an arbitrary threshold.</p> <p>Policy SG23 is modified replacing ‘local rural roads’ with: “road safety, residential amenities”</p>	<p><b>Noted</b></p>

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	local communities in terms of noise and vibration?		
	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) subject to standard protections against loss of residential amenity, impact on heritage, open space etc?	Not addressed.	<b>Neighbourhood plans are not obliged to contain policies addressing all types of development.</b>
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	Suggested map changes are made.	<b>Noted</b>

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	above, it will be helpful if the Local Wildlife Sites and Features of Heritage Interest could be referenced on Maps 6 and 9.		