

Billesdon Neighbourhood Plan

Summary of representations submitted by Harborough District Council to the independent examiner pursuant to paragraph 9 of Schedule 4B to the 1990 Act

Name	Full Representation
Gail Atkinson	<p>Policy BP3 Housing Allocation</p> <p>Having read the supporting documents relevant to the above and having read the RAG report , I fail to see how this proposal has been fairly and subjectively determined and have great concern that prior to this information being reported in the Billesdon Neighbourhood Plan 2013 – 2028 no public consultation or discussions with the residents of the findings of the RAG scoring took place, in addition the results of the weights were not taken to public consultation.</p> <p>Document D1 (document does not have pages numbers so I cannot refer to page). Total Counts following question 9, sites 01/07 counts are considerably less (114 total) than sites 05 and 06 (341 total). With reference to document D2 item 6, site numbers 01/07 received the lowest % replies (8% total) as opposed to sites 05/05 (30% total) and sites 02/03</p> <p>Following the results of the community consultation 7/9th February 2013 document D2 – item 2 – sites 01/07 not detailed as option if there was a preference for 45 houses, item 4 details sites 01/07 as an option only if more than 45 houses are chosen yet sites 02/03 received 17% as first choice and sites 05/06 27% first choice. Item 5 showing the composite RAG scores overall as 01/07 Amber and sites 05/06 Green.</p>

TRAFFIC

Sites A/BL/HSG/01 and 07 will add to traffic volume through the village to access the A47 without doubt, (my property is on Rolleston Road and I always go through the village to access the A47), this will increase traffic through Church Street /Brook Lane and the Market Place. Sites 05/06 are set in a more beneficial position with regard to traffic management to allow access direct onto the A47 without travelling through the village.

Document D2 item 4 details that sites 01/07 receive a RAG score of Amber and sites 05/06 green, item 5 states that least impact on traffic flows through the village will be sites 05, 06, and 08

LANDSCAPE AND ENVIRONMENT

Landscaping Sites A/BL/HSG/01 and 07 – due to levels, the landscaping will be altered significantly and consequence concerns with the existing water course and the affects with additional housing. Existing trees and woodland will be removed, whereas sites A/BL/HSG/05 and 06 are fields and will have less impact and destruction.

Reference Document E 10.1 The community vision for Billesdon

- iii) - the existing woodland copse, trees and hedgerows protect and enhance the countryside landscape, wildlife habitats and biodiversity.
- iv) the proposal to develop sites 01/07 will add to the issue of through traffic in the village and parking problems.

	<p>Sites A/BL/HSG/05 and 06 were favourable with regard to least impact in terms of structure, parking, visual impact, and transport through the village, sites A/BL/HSG/01 and 07 will add to traffic volume through the village to access the A47 without doubt.</p> <p>Sites A/BL/HSG/01 and 07 were not considered previously as preferable sites following public consultations, however, in a short period of time and again without knowledge to the residents prior to the August 2013 public meetings this information was not made available to allow residents to comment.</p> <p>The recommendation of the BNDP committee to propose sites 01/07 in the plan should have been taken to public consultation prior to this report being issued. The message at the presentation was 'like it or fear the worst' and clearly if this is the case the BNDP committee appear to have taken this decision on their own, however, clearly there is opposition to the new development to propose sites 01/07.</p> <p>The scoring and weighting is most subjective and sites 02/03/05/06 have received significant support from the public consultation, sites 01/07 were only considered in February 2013 and no further public consultation to my knowledge took place before the report was issued.</p>
<p>David Wilson Homes (Helen Bareford)</p>	<p>Policy BP2</p> <p>It is considered that Policy BP2 of the Billesdon Neighbourhood Development Plan (Submission Plan) is in general conformity with the strategic policies contained within the Harborough District Council Core Strategy and aims to plan positively by providing a target of 45 dwellings over the development period to 2028 in Billesdon. Support is given to the amount of new housing proposed, however it is considered that this figure should be a 'minimum' figure. Paragraph 1.4 of Supporting EDocument E states that 'actual provision may be higher/lower than the total target', and it is considered that the capacity of site allocations proposed in Policy BP3 do not provide sufficiently for future growth.</p> <p>Policy BP3</p> <p>We raise a fundamental objection to the way the criteria has been applied within the Site Selection Framework to assess individual sites for housing allocations. This application, whilst clearly the subject of community consultation, is not robust and lacks formal assessment, which has resulted in proposed site allocations which do not conform to the principles of sustainable development, especially when considered against the reasonable alternatives. Objections to the use of the framework criteria were raised at the Pre-Submission consultation stage of the Neighbourhood Development Plan. The Consultation Statement states that the process set out in the Site</p>

Selection Framework is to be clarified, however no amendments have been made, no clarification is demonstrated and the matter has not been addressed.

The allocation of sites appears to have been based entirely upon the criteria within the Site Selection Framework. We object fundamentally to the lack of formal assessment on crucial criteria such as traffic flows and landscape quality which we consider has generated inaccurate and unfair assessments based on the views of the Neighbourhood Plan Group. These views have informed critical decisions on site selection and do not meet the basic conditions of achieving sustainable development. There is no evidence that the proposed site allocations are based on fact rather than they are based on preferences which do not have regard to actual evidence, and therefore we consider the evidence base to be fundamentally flawed.

We object on the unsuitability of the proposed housing sites A and B on land north of High Acres, Uppingham Road and land east of Rolleston Road. We do not consider site A to have a safe and suitable highways access. Site B is considered to form an important part of the rural setting of the eastern edge of the village evident when approaching and leaving the village. These objections are discussed in further detail within our previous objections (attached). We strongly believe that formal traffic/highways assessments and landscape quality assessments would have generated vastly different conclusions within the Site Selection Framework, and therefore the most appropriate/sustainable sites have not been selected.

Proposed Changes

We respectfully request that the Site Selection Framework is evaluated in detail, and that formal assessments are required as part of the Site Selection process. A factual evidence base is required to meet the basic conditions of achieving sustainable development. These changes are required in order for the Neighbourhood Plan to meet the basic conditions.

Additional Comments submitted at Pre-Submission stage, and included in the Statement of Consultation:

Introduction

The Billesdon Neighbourhood Development Plan has an important role in the determination of where new residential development will go within the village. The plan must be in general conformity with the National Planning Policy Framework (NPPF) and the 2011 Harborough Core Strategy, with an overall requirement for the presumption in favour of sustainable development.

Adopted Core Strategy

It is considered that Policy BP2 of the Neighbourhood Development Plan Draft Proposals is in general conformity with Strategic Policies of Harborough District Council and aims to plan positively by providing a target of 45 dwellings over the development period to 2028 in Billesdon. It is considered that 45 dwellings is an appropriate amount of new housing for Billesdon, however with respect to paragraph 11.4 of Supporting Document E which states that 'actual provision may be higher/lower than the total target' we have questioned the capacity of the proposed site allocations in Policy BP3, and consider that altogether they do not provide sufficiently for future growth.

Harborough District Council New Local Plan

It is considered that the housing requirement for Billesdon will rise through the emergence of the Harborough District Council New Local

Plan. The proposed site allocations, land to the north of High Acres (Site A), land east of Rolleston Road (Site B), and the former lorry park, Gaulby Road (Reserve Site) can collectively provide approximately 54 dwellings. This total figure is considered to be insufficient to accommodate additional housing requirements expected from the emerging New Local Plan. A solution to this potential capacity issue would be to combine the proposed Reserve Site with the land adjacent on Gaulby Road. Formal Assessments with respect to transport, landscaping, and flood risk have been produced on land at Gaulby Road which concluded that development would have a moderate impact on traffic flows, and importantly no more impact than created by any other development in Billesdon. Following feedback from the neighbourhood Plan Group on 28th August, it is considered that a number of changes required can be implemented, along with the potential to provide land adjacent to and to the rear of the primary school for car parking/potential growth of the primary school. The combined land at Gaulby Road would provide Billesdon with a larger Reserve Site capable of accommodating and delivering potential future requirements and will prevent more piecemeal, unregulated development within Billesdon. We therefore respectfully request the Neighbourhood Plan Group consider this option of increasing the capacity of the Reserve Site.

Site Selection Process

A fundamental objection we raise with respect to the formulation of the Draft Neighbourhood Development Plan is the way that the criteria have been applied to assess individual sites within the Site Selection Framework (as displayed in Supporting Document F). For clarity, we do not contest the criteria, or the principle of using the Site Selection Framework. We object to the lack of formal assessment on crucial criteria such as traffic flows and landscape quality which we consider has generated inaccurate and unfair assessments, which have informed critical decisions on site selection. We consider the way that the criteria have been applied to be fundamentally wrong, and therefore the evidence base to be flawed. There is no evidence that the proposed site allocations are based on fact rather than they are based on preferences which do not have regard to actual evidence.

For example, an appeal for a residential dwelling on land to the east of Rolleston Road (reference APP/F2415/A/99/1018794 – 98/00904/OUT) was dismissed by the Inspector as the site was considered to be ‘not well related to existing development, and if allowed would create an element of ribbon development’. The Inspector also considered the site to form ‘an important part of the rural setting of the eastern edge of the village evident when approaching and leaving the village’, however, the Site Selection Framework considers the landscape quality to be moderate, and appropriate for development in landscape terms. It appears that judgement used in the proportionate approach has been applied improperly, and we consider that an equitable approach to our site (land at Gaulby Road) has not been taken in comparison with other sites, based on the presentation of an indicative layout not produced in conjunction with the Neighbourhood Plan Group.

Summary and Conclusions

In summary we respectfully request that consideration is given by the Neighbourhood Plan Group to extend the proposed Reserve Site to *include* the adjacent land at Gaulby Road. We consider that an appropriate scheme could be produced in collaboration with the Billesdon Neighbourhood Plan Group should the land be required for future development which could include solutions to identified key issues such as parking around the Primary School at peak times.

The Neighbourhood Plan Examination is the appropriate basis for the Site Selection Framework to be evaluated, and we wish to address this detail further at Examination.

<p>Environment Agency</p>	<p>Page 24/25 Water Management – Paras 6.13 & 6.14 Policy BP14</p> <p>It is noted that within “Supporting Document: A” Consultation Statement several references are made to flooding in the village. However within all documentation there is no reference to the Harborough BC adopted Core Strategy Policy CS10 – Flood Risk, which addresses both fluvial and pluvial flood risk and the use of sustainable drainage systems in new developments.</p> <p>Page 24 para 6.15 & 6.16 - Policy BP14</p> <p>The site overlies a secondary aquifer (undifferentiated) and as such should be protected from contamination. We therefore welcome the recommendations in sections 6.13 to 6.16 of the above report which detail the reasoning behind policy BP14.</p> <p>Page 31 para 8.5 and Policy BP21 Biodiversity</p> <p>We welcome the comments on biodiversity (p31) ‘8.5 and would suggest that particular reference could be made to the protection and enhancement of species and habitats of ‘principal’ importance” for the conservation of biological diversity listed for England under s41 of the Natural Environment and Rural Communities (NERC) Act 2006. Section 40 of NERC Act 2006 local planning authorities must have regard to purpose of conserving biodiversity.</p> <p>Page 32 para 8.10 & Policy BP23 Climate Change</p> <p>Climate change is increasingly recognised as the biggest environmental threat we face. A consequence of which can be hotter, drier summers, leading to water scarcity, drought and placing greater strain on wildlife. Whilst we welcome rain harvesting & grey water recycling we see as an omission the installations of fittings that will minimise water usage and also the use of water efficient appliances in new developments.</p>
<p>Andrew Granger (Fritz Graves)</p>	<p>On behalf of our client, Bloor Homes, we wish to make the following observations on the Billesdon Neighbourhood Development Plan. We have previously made submissions to the Pre-Submission Draft for Consultation and attended and represented our client at the public consultation events.</p> <p>Whilst we acknowledge that the Inspector is to test whether the Neighbourhood Plan meets the basic conditions and other relevant legal requirements set out in the Localism Act we consider that there are fundamental flaws in the evidence documents and process which undermines, and calls into question, the validity and soundness of the Neighbourhood Plan.</p> <p>We have felt it necessary to comment as comprehensively as possible on the documentation available in the public domain, including the</p>

Supporting Documents which make up the Evidence Base.

Supporting Document D(1): Evidence Base

With regards to Qs. 8 & 9, we question how the BNDPG came to the conclusion regarding the following two points:

1. Proposed housing target of 45 – the survey results show that 20.0% favoured 1-10 dwellings, 16.3% were in support of 31-40 dwellings, 14.1% favoured 41-50 and 12.0% were in support of 21-30.
2. Selection of two site combination – 34.1% of residents favoured development on one site and 24.7% & 16.5% were in support of two and three sites, respectively.

Supporting Document D(2): Evidence Base

With reference to the above document, we make the following comments:

The results from the community consultation event held on the 15th May 2012, highlight that 36% of respondents favoured site 3 as the most suitable single site solution, with 25% selecting site 5. However, at the community consultation event, which took place on 7th/9th February 2013, sites 3 and 5 (the most popular sites, as just alluded to) were not considered in isolation. It was site 8, which was put forward in isolation as the only single site option.

We question why this was the case, and why sites 3 and 5 were not also proposed as single site options.

In addition to the above comment, there is a further discrepancy between the results of the consultation event on the 15th May 2012 and the proposed potential site combinations put forward for consideration on the 7th/9th February 2013. The two site combination on the 7th/9th February 2013 included sites 02/03, yet there was no support for these sites at the previous event on the 15th May 2012 as a two site option.

We again question the process behind putting forward site combinations, as it does not appear to be based on the results of previous consultation events and does not enable residents to form their own combinations or vote on individual sites.

Supporting Document E: Number of Dwellings

Whilst we support the number of new dwellings proposed for Billesdon,

we believe that this figure should be expressed as a minimum number of dwellings and not as a maximum target. We consider that the plan needs to take a more flexible approach to providing dwellings across the plan period and plan for change and demand up until 2028.

Supporting Document F: Site Selection Framework

We found the process followed to be somewhat subjective, inconsistent and unaccountable.

We believe that there are a number of anomalies when looking at the RAG Scores. We note two examples below:

1. If we consider the 'Impact of Traffic' criteria, the scoring for site 05, green, is correct. However, the scoring for site 08 is also green, which we believe is wrong. Site 8 will lead to an increase in traffic through the village centre to travel to both the primary school and the A47 junction. Therefore, the site will have an impact upon traffic through the village centre, which does not accord with the score given.
2. Another criteria we consider to be incorrect, is 'Public Rights of Way'. Site 5 has been marked as amber, when there is a footpath to the village centre and it is the only site where children would be able to walk to the Primary School without crossing a road.

We do acknowledge that our client's site does score low in comparison to other sites. However, there is only a difference of 5% between Site 5 (57) and Site 8 (54), which is heavily influenced by the 'Landscape Character' score. We consider that this is the only constraint to development on site, when you assess the RAG scores. To overcome this, there is an agreed design solution to minimise the impact of the development on the surrounding environment and character of the settlement. The design solution, which includes the provision of open parkland and allotments, was supported through public consultation. The provision of footpaths (used to create attractive green avenues within the development), which will link to the existing network of footpaths within Billesdon, will ensure the site and open parkland/allotments are accessible and not enclosed. This will also ensure the site is integrated within the existing built form of the settlement.

The RAG score also focuses on 'safeguarding important views and

landmarks', we acknowledge the site scores poorly. However, we do not consider that this is correct and we question the process behind producing this score. As you enter the village from the west, the site is heavily screened by mature trees and hedgerows, and it is not until you are adjacent to our client's site that you see it. Furthermore, the concept plan for the proposed development outlines how views across the site to the church will be protected. We consider that our site is no more visually prominent than other sites put forward for consideration. A large part of Site 8 is visually prominent as you travel into the village from the eastern side. If this area was taken out of consideration it would greatly reduce the developable area.

Objection

For the above reasons we object to the Billesdon Neighbourhood Development Submission on the basis that the processes behind the allocation of sites does not appear to be robust and has raised a number of questions. We propose that the BNDG review the allocation of sites. The Community Consultation event of the 7/9 February 2013 caused much confusion for residents; and unfairly, and unnecessarily, grouped sites together thereby limiting choice. Residents were not given the option of selecting our site HSG/05 independently of HSG/06. Public support for HSG/05 was generally favourable over the two day event but the selection of the site was prejudiced by the choices presented to residents. This was pointed out to Parish representatives at the time, and subsequently recorded in writing. From the public response at the consultation event it was clearly evident that the majority of people favoured our site and especially the constructive approach we presented.

Proposal

Further to the above points we consider that our site is suitable to accommodate future development and provide new dwellings in line with guidance set out in the National Planning Policy Framework and the Harborough District Core Strategy. The development will ensure the site is well integrated and linked to the existing settlement and will provide open parkland for both current and future residents of Billesdon to enjoy. The open parkland and allotments

	<p>will not be divorced from the existing community; rather it will be a community space, accessible for all residents of Billesdon. It will create a new soft edge to the village, recognising that, as with any new housing site around the village, there will be incursion into the countryside landscape.</p> <p>The proposal incorporates a mixture of housing types and tenures, providing new homes in the village including bungalows, with good safe pedestrian links to the existing village. Muddy Lane will be protected and remain in situ, physically unaltered. Vehicular access will be directly onto the Leicester Rd, with traffic calming as requested by residents.</p> <p>We propose that the Parish Council be invited to reconsider its proposal for new housing, and allocate the above site either as a replacement for, or in addition to, a reduced HSG08 which more should properly deal with landscape intrusion, traffic impact, and pedestrian safety.</p> <p>Further letter submitted:</p> <p>Dear Sirs</p> <p><u>RE: BILLEDON NEIGHBOURHOOD PLAN EXAMINATION VERSION</u></p> <p>Please find enclosed our submission on behalf of Bloor Homes Ltd in connection with the above matter.</p> <p>We draw your attention particularly to the iniquity of the public consultation which has produced a flawed decision through the Community Consultation event in February 2013 due to an unfair presentation of site choices. In essence, our site was unfathomably and unjustifiably linked with another site as one of the choices presented to Parishioners. It is fair to say that the majority of people who discussed our site with us were very supportive but their decision was influenced by having to include it with another site, which most people did not want. We should point out that we have absolutely no interest in the site with which ours was grouped for public choice; and the sites are completely independent of one another. We pointed this out to Parish representatives at the time. Ironically the site being favoured by the Parish Council was presented by them as a stand alone site, and we believe that had we been afforded the same standing then the public consideration would have presented a different outcome.</p> <p>We do not consider that the Parish response has properly and fairly dealt with this matter.</p>
<p>Harborough District Council (Christopher</p>	<p>Across the document</p> <p>Wording of a 'target of X dwellings' should be replaced with wording of 'a minimum of X dwellings' to be in compliance with Core Strategy Policy CS2.</p>

Brown)	<p>Policy BP2</p> <p>Additional statement required outlining the need to review the Plan should the Core Strategy be superseded by a Development Plan, and with it the need to update the period of the plan, the target housing requirement, and policy with regards to housing within limits to development.</p>
Hazleton Homes (David Morley)	<p>HOUSING (Para 4 of Plan) Hazelton Homes Ltd has an agreement for the purchase and development of the land north of High Acres, Uppingham Road shown as site A on the proposals map. In addition it has reached agreement to with the owners of the land between the site and the Uppingham Rd (the former bridleway) to purchase this land for an access to construct an estate road into the site to be adopted on its completion. The company is also able to provide a pedestrian access from the site onto Long Lane and from there into the village centre.</p> <p>Hazelton Homes are confident they can bring forward the site for development and are proposing to submit a planning application immediately on the adoption of the Neighbourhood Plan.</p> <p>In general Hazelton Homes are supportive of the plans proposals for housing as set out in the 4 HOUSING, paragraphs 4.7 to 4.14 and policy statements BP2, BP3, BP4, BP6.</p> <p>EMPLOYMENT (Para 5 of Plan) Hazelton Homes are supportive of policy BP8.</p> <p>SERVICES AND FACILITIES (Para 6 of Plan) Hazelton Homes are supportive of policy BP13 providing it remains in its current form with regard to viability.</p> <p>TRAFFIC AND TRANSPORT (Para 7 of Plan) Hazelton Homes are supportive of policies BP16, BP17 and BP18</p> <p>ENVIRONMENT AND CLIMATE CHANGE (Para 8 of Plan) Hazelton Homes are supportive of policies BP19. Hazelton Homes are also supportive of BP21 and BP23 but suggest that they are amended to make it clear that they should not compromise the viability of the developments.</p> <p>DESIGN STATEMENT (PARA 9 OF PLAN) Hazelton Homes are supportive of the principals set out in the Design Statement.</p>

<p>Highways Agency</p>	<p>Given the location of Billesdon and the scale of proposed the housing provision, it is not anticipated the proposal will have a significant impact on the strategic road network and in particular the M1. Therefore under the circumstance the Highways Agency have no specific comments to make.</p>
<p>Natural England</p>	<p>Thank you for your consultation on the above document which was received by Natural England on 10 December 2013 Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development. Natural England generally welcomes the Billesdon Neighbourhood Development Plan. We particularly support chapter 8: Environment and Climate Change, which we consider provides a strong framework for the protection and enhancement of the landscape and biodiversity of the parish as well as encouraging the positive provision of green infrastructure. We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us. For any queries relating to the specific advice in this letter only please contact Roslyn Deeming on 0300 060 1524. For any new consultations, or to provide further information on this</p>
<p>National Farmers Union</p>	<p>Paragraph 3.19 We hope that the protection of the distinctive rural landscape will not prevent development on farms which need to develop to improve their farm and diversified businesses. Policy BP11 Business in the Countryside. We hope that Policy BP11 will allow the conversion of traditional farm buildings for housing and if there is no valid alternative use.</p>
<p>Leicestershire County Council (Sarah Rudkin)</p>	<p>Leicestershire County Council departments didn't have anything further to add because we were involved during the drafted stages of this plan and all comments made were dealt with in the document ahead of this consultation.</p>
<p>David Mills</p>	<p>Harborough Core Strategy The Neighbourhood Plan is based on an out of date Policy Framework Freedom of Information</p>

The Group has not complied with the basic legal requirement to publish information (please see copies of correspondence)

The 37 Criteria

The method of assessing sites was incorrect, and there was no village involvement, allowing Group members to skew the results to fit their own personal agendas

Green Issues

A wildlife corridor between the village and the by-pass would close – going against policy requirements

National Planning Framework

The requirement to 'enhance and improve places where people live' has not been met.

Democratic principles

No public discussion has been allowed after the Draft Plan was issued in June

Prime reason for Village support must be confirmed

Can HDC confirm the figure of 45 houses being the total number of housing development during the full period of the Plan

Further comments submitted:

Comments on the Billesdon Neighbourhood Development Plan

The Harborough Core Strategy

As stated in the first paragraph of the Plan, the Neighbourhood Development Plan must be in line with the 2012 National Planning Policy Framework and the 2011 Harborough Core Strategy. However on 3rd December 2012 the Harborough Council resolved to prepare a New Local Plan in response to a number of important Government changes in respect of local planning policy. The 2011 Harborough Core Strategy will undergo a focused review and is therefore currently on hold. The New Local Plan is due for adoption in July 2015 and will go up to 2031 not 2028 as quoted in the Neighbourhood Development Plan therefore the basis for the Plan is incorrect.

None of this information has been given to the residents of Billesdon.

Freedom of Information Legislation

On reading in the Parish Magazine in early June when, for the first time, the choice of sites was made public, I tried for almost two months from 11th June 2013 to obtain copies of –

The results of the Community Consultation in February.

The HDC Site Selection Report the Group used in their decision on site selection.

Details of the 37 objective criteria they also based their decision on.

None of these were provided by the Neighbourhood Development Plan Group, and my appeal to the Parish Council on 29th July 2013 for this information was also rejected. This lack of sharing information goes against the spirit of the Plan and does not comply with the legal requirement 'to proactively publish or make available as a matter of routine information to the Public'

The Site Selection Report from the Harborough District Council in January 2013, which surveyed all the sites put up for development, was issued. This showed most of the sites were satisfactory in principle, except for site 08 which was rejected outright. One of the main criticisms of this site by the Council was the large, negative traffic impact that its development would create in the village.

The Group were instructed in their meeting of Monday 7th January 2013 to decide on their preferred site 'based on evidence in the results of the Community Questionnaire and the Site Assessment Report of the HDC' so the Questionnaire as it stood at that time was a vital piece of information.

I asked the Parish Council to ensure that this Report was presented at the Public Forums held recently, but it was not presented.

None of this information has been given to the residents of Billesdon.

The 37 Criteria

These do not comply with an acceptable standard regarding the village involvement, the basic logic behind the process, and democratic standards.

With the majority of residents responding to a preference for the 05 combinations, and the Harborough District Council rejecting site 08, the choice that the Neighbourhood Development Plan Group made must have been swayed overwhelmingly by the analysis of the 37 criteria that were used on each site. However the difference in the scores between site 05 (57) and 08 (54) is only 5%.

The methodology of the measurement of the Criteria under the RAG system with only three choices restricts the results. Harborough Council recommend 5 choices -

1. It restricts the differences between the sites to scores of 1 (Red), 2 (Amber), 3 (Green) which gives no scope to display more significant differences than a scoring system of 1 – 10 for example.
2. It does not grade the Criteria in importance of selection. So 'Gas/Oil Pipeline' has the same three points as 'Impact of traffic' which has such considerable impact on the village.

The system itself is therefore inflexible. However the way in which the result was decided on was totally undemocratic. No-one was allowed questions at the Presentations that were made recently, so there has been no village involvement in the decisions on these Criteria.

Some of the scoring decisions made are at best naïve, but the resulting scores skew the final result.

If we take the 'Impact of traffic' Criteria, which is one of the most significant adverse results of any development, and is mentioned as being a problem no less than 15 times in the Neighbourhood Development Plan and Village Design Statement, the scoring for site 05 is Green correct, but for site 08 it is also Green which is completely wrong as –

1. The Consultant to the Group reported that drivers leaving site 08 would turn left, so not increasing traffic flow through the village. As the majority would be travelling towards Leicester this assumes that they would travel ¼ mile away from Leicester – queue to join the Melton/Harborough Road, then queue to join the A47 at one of the most dangerous junctions in the County, and then travel another ¼ mile to be back were they got started!
2. Site 08 is the furthest site from the School. Parents will use their cars to ferry their children to and from school adding to the traffic along Brook Lane/Church Street and the chaos round the school. This is specifically identified in the Neighbourhood Development Plan as a problem that must be avoided.

Another important Criteria is access to public rights of way and footways.

Site 05 has been marked as Amber while it has one footpath directly down through the village to shops, buses etc., and another footpath through to Church Street. Site 5 is the only site where children could walk to the Primary School without crossing a

road. There is also a footpath from this site directly onto the open countryside, and it also has Muddy Lane running alongside.

Site 08 has been marked as Green. The proposed footpath connects the site to Long Lane at its narrowest part that is without a pavement for safe walking. Long Lane is treated as an overflow car park for the centre of the village and is always congested, however the footpath proposed will funnel people along the Lane towards the centre where they will be forced to cross the main road on a virtually blind and busy bend. This is a very dangerous proposal.

There are disputes over the positioning of the footpath proposed for site 08 which does not exist at the present time. It is one of the essential requirements of the Plan that footpath access must be in place. We cannot therefore approve site 08 until a clear, legally permissible footpath is in existence.

The results for the Criteria covering Landscaping cannot take the lie of the land into consideration.

The land at site 05 falls away steeply from the road and is at the end of a bend on the hill up to the village. Of course the development will be visible, as they all will be, however the impact of site 05 will be left to the last minute as you enter the village, with the screen of trees along the roadside hiding the sight of it.

The land at site 08 rises up to the highest point of the village. Ridgelines and hilltops are marked as Red in the Rag scoring not Green! In a previous planning application the Inspector said of the site 'The site is in an elevated position above the village and can be seen very easily from the open countryside to the North, and can also be seen from and between buildings within the village'. He rejected the application.

Residents have had no input into these Criteria which seems to have swayed the Group to ignore the wishes of the residents and the objections from Harborough Council. However they seem to be marginal in the differences between sites, the system averages out differences, and some of the scoring seems at best naive.

Green Issues

Developments are expected to enhance existing ecological corridors, but by developing site 08 the wildlife corridor between the village and the by-pass will be closed.

A portion of the old and extensive hedgerow in the middle of site 08 will be pulled up.

National Planning Policy Framework

There is a requirement in the National Planning Policy Framework for the Plan to result in 'enhancing and improving the places where people live'.

There is no mention anywhere in the Plan about the quality of life for our new neighbours if site 08 is developed. The noise (only considered Amber in the scoring criteria even though the developers admit they will be putting triple glazing in!) and pollution from the by-pass is continuous 24/7. Surely they have the same right to expect a peaceful and tranquil village life as we all wish for and are striving to maintain in Billesdon.

Democratic Principles

'Public participation and approval are the keys to the success of the project'

The above is quoted on the majority of the Groups notices in the Parish Magazine.

These notices have included bullying and scaremongering statements that if we did not vote for the Plan a 'no' vote 'will leave the Parish to be developed by planners and house builders over which the community would have no control'. There has been no public debate – the two Village Presentations both started with the statement that there would be no discussion or questions after the presentations.

Number of Houses

Throughout the period of the preparation of the Draft Plan the main purpose of the Plan, as presented to the village, was to limit the number of houses being built during the period the Plan covered. We were told in the Public Presentations that a number of 45 houses had been agreed with HDC. If this is not the case the HDC need to tell the village and new Public Presentations made.

CONCLUSION

There has been a tremendous amount of hard work and useful information produced in the Plan by many people. For the Plan to be rejected by a hurried vote would be a complete waste. But, in my opinion, the wrong recommendations regarding the timing and positioning of houses has been arrived at.

I believe the 37 Criteria ought to be reviewed and scored by residents to avoid any suspicion of prejudice, or voting through self interest. The potential sites are now identified as site 03, 05, 08 and 10 so a simple one site solution can be made rather than the combinations of sites previously chosen.

Also, that residents should be informed about the changes in the Harborough Core Strategy and the opinion that Harborough Planning Department have on the three sites. They can then give an informed view on how the phasing and timing of any developments should be arranged.

This will result in a report based on democratic principles, owned by the village, after open discussions and informed decisions.

	Additional letters between Mr Mills and the Billesdon Neighbourhood Development Plan Group were also submitted.
Police (Michael Lambert)	<p>Thank you for consulting the Police and Crime Commissioner for Leicestershire on this draft plan and I now offer some general comments on his behalf. The village are to be congratulated on their efforts and for progressing the document to this stage.</p> <p>Like many more sustainable rural settlements the village will face growth in the next 15 years and villagers have considered how and where this is best accommodated. The Plan should ensure that local people will lead this process.</p> <p>Police and other services are facing such growth across our sub region with many much larger proposals for new housing including in this. There will be a considerable impact on the service and whilst our revenue streams will adjust to a limited extent there is a historic problem in our funding to provide for additional capital infrastructures like communications and IT systems, vehicles, officer equipment and premises.</p> <p>Harborough's Core Strategy and developer guidance recognises this and makes provision for developer contributions. The Neighbourhood Plan needs to be in general conformity with the Core Strategy and it does recognise this content. The Plan considers infrastructures and the impact of development upon these [PB13] and although there is no reference to crime and community safety I have no doubt that additional development of the scale proposed will impact Policing demand. There are particular characteristics in this for remoter rural settlements like Billesdon. Police do all we can within our resources to make the service accessible especially when people need and demand our support.</p> <p>Leicestershire Police are a regular participant in Planning matters in Harborough District and rely on Core Strategy infrastructure policies to offset the impacts of growth on the service. This is likely to mean that we may on occasions seek contributions from developments in Billesdon as we do elsewhere and indeed alongside the requests of other services which support the local community.</p> <p>I hope this comment and input is welcomed by the Neighbourhood Development Plan Group and I wish them success with their document.</p>
Mr David Quinn (on behalf of Billesdon Baptist	<p>Proposals Map, 8.1, 8.4 and Policy BP20</p> <p>At a meeting of members of Billesdon Baptist Chapel on Tuesday 21 January 2014 a resolution that the Trustees of the Chapel should</p>

<p>Chapel)</p>	<p>object to the allocation of part of the site of the Chapel as Local Green Space, in the Billesdon Neighbourhood Development Plan, was approved unanimously.</p> <p>The area of land in question is roughly rectangular in shape, and is currently used as a private garden, over which the public have no acquired rights of access or rights of way. The boundaries are defined by a wall and iron gates to the road boundary, and largely by hedges and shrubbery to the remainder.</p> <p>The total frontage of the Chapel site to Brook Lane measures approx. 75feet, and some 63 feet of that will be compromised by the allocated land, which also comprises approximately 17% of the total chapel site area.</p> <p>Our submission is that the allocation of the land as Local Green Space will have an adverse effect on the Chapel's right to have peaceful and quiet enjoyment of not only the allocated land but of the whole site.</p> <p>The BNDP document says that Local Green Space identified on the Proposals Map will be protected, and development that is harmful to these Local Green Spaces will not be approved.</p> <p>Consequently, by virtue of the large proportion of the Chapel's total land frontage being occupied by the proposed Local Green Space, the possibility of improving the very restricted vehicular access to the Chapel, which is of only single vehicle width with no footpath provision, would no longer be possible, and any future redevelopment potential of the larger site could be effectively ruled out if the Chapel closed or if we should ever have a need to relocate the Chapel to new premises.</p> <p>We consider this to be a totally unacceptable situation and contend the allocation to be entirely inappropriate, no thought having been given to the consequences of the decision.</p> <p>We cannot understand the principles which have been applied in deciding that a particular area such as the Chapel's privately owned land should be allocated as Local Green Space, and other similar areas of privately owned gardens of which there are many in the village, have not been similarly designated.</p> <p>We also suggest that as the whole of the Chapel site is located within the boundaries of the Billesdon Conservation Area enough planning controls are already in place to ensure that only appropriate development is permitted, and allocation of the land currently used as private garden is unnecessary.</p>
<p>Sandrion Limited (Mr Lance Wiggins)</p>	<p>Page 6 Plan Policies, first bullet point – Housing</p> <p>The proposed development of 45 new houses in the village by 2028 should be expressed as 'the development of at least 45 dwellings' as this would more closely conform to the strategic policies set out in the adopted Core strategy. Policy CS2 states that at least 2,420 dwellings should be built in the plan period in Rural Centres (including Billesdon) and selected rural villages. For clarity, the word dwellings should be used as this would include bungalows and flats.</p> <p>Page 16 paragraph 4.2 and 4.3 – target of 45 houses</p> <p>As above</p> <p>Policy BP2: Housing Provision</p> <p>This policy is supported subject to its alteration to 'at least 45 dwellings'.</p> <p>Policy BP3: Housing Allocations</p>

This policy is supported although as the promoter for site B, my clients wish to stress that there are no significant issues with delivery of the development on this site that would lead me to believe that the reserve site would be necessary in lieu of site B. Sandrion have an agreement with the owners that they will purchase the site in receipt of detailed planning permission. There are no substantive practical or technical issues with the development of the site and subject to the comments set out in respect of Policy BP5, the development of the site is fundamentally viable.

Page 18 paragraph 4.8 and Policy BP6: Affordable Housing

This policy approach is supported given the need to ensure economic viability of the schemes for the development of the allocated sites

Policy BP7: Building for Life

The stipulation that new development should meet the requirements of the Billesdon Village Design Statement (VDS) exceeds what is set out in the adopted Core Strategy in either policy CS2 or CS11. Whilst it is accepted that all new developments should have regard to the VDS, policy BP7 as drafted is considered not to conform to the strategic policies of the development plan. Furthermore, although Building for Life 12 is a worthy discursive tool for increasing the quality of design, the requirement that developments of five or more dwellings should achieve 12 greens is unrealistic and excessive given the need in policy CS11 simply to achieve the highest standards of design.

Policy BP9: Superfast Broadband

If the provision of such high quality broadband is technically feasible, the promoters of site B would be supportive of providing the necessary ducting etc within the new properties to facilitate the service.

Policy BP5: Land east of Rolleston Road (site B)

As the promoter of site B, my clients support this policy in principle. However, we are concerned about some of the prescriptive details that are set out in the policy, as follows:

The inclusion of a target figure should be replaced with an expression that the site would be developed for at least 10 dwellings. My clients have prepared a master plan showing how the site can be appropriately developed with 12 dwellings. This has been presented to the Billesdon Neighbourhood Plan Group and this has been the subject of public consultation as evidenced by Annex 2 to the Statement of Consultation. The development of 12 dwellings represents an appropriate density of 25 dwellings/hectare. A copy of the presentation is appended to these representations.

The provision of at least 30% affordable housing is supported. The proposed master plan shows 4 two bedroom affordable houses (4 being 30% of 12 dwellings). This increased provision provides further support to the removal of the target figure of 10 dwellings from policy BP5.

The requirement that at least three of the remaining dwellings be designed to be bungalows is overly prescriptive. The site promoters have included three dwellings in the scheme that are essentially bungalows in that they contain all essential living accommodation, including a bedroom, on the ground floor. Recognising that older people and people disabilities have visitors and family members who can readily access first floor accommodation, this restriction goes beyond what is set out in policy CS2 of the Core Strategy (in terms of securing a mix of dwellings) and together with the requirement for 30% affordable housing, its inclusion would potentially threaten the economic viability of the site. Paragraph 173 of the National Planning Policy Framework makes it clear that site developments should not be subject to a scale of obligations and policy burdens such that their ability to be developed viably would be threatened. The costs of requirements such as affordable housing, standards or other requirements such as a restriction to single storey development need to be taken into account when considering the proposed policy wording of policy BP5.

Although it is also considered overly prescriptive in a policy of this nature, the requirement that at least 50% of the dwellings would be two or three bedrooms is met by the development that is shown on the current master plan.

The requirement that all dwellings be designed to meet Code for Sustainable Homes (CSH) level 4 is also considered to be overly prescriptive in a policy of this nature, particularly given the reduced emphasis that the Government intends to place on CSH in the future. The site promoters are prepared to include three dwellings that would be designed to maximise energy efficiency and achieve high environmental standards and these are shown on the submitted master plan, however, it is felt that a requirement to meet code level 4 goes beyond what is required by the adopted Core Strategy.

Policy BP13: Infrastructure

	<p>The requirements for financial contributions towards the improvement, remodelling or enhancement of existing facilities at the Billesdon Parochial Primary School and secondary schools should be expressed as the requirement for financial contributions towards the provision of the additional school places made necessary by the respective developments as this would better fit the CIL Regulation 122 test and better comply with the provisions of policy CS12 of the Core Strategy which refers to the Local Infrastructure Schedule. This Schedule refers, in respect of Rural Centres, to the extension of primary and secondary schools, however, this is based on the availability (or otherwise) of spare capacity at the respective schools.</p> <p>Billesdon Village Design Statement (VDS)</p> <p>Subject to the comments that I have made in relation to policy BP7, the guidance set out in the VDS is supported and the design guidelines set out in paragraphs 3.1 onwards have been followed in the preparation of my clients scheme.</p>
Sport England	<p>Thank you for consulting Sport England on the above Neighbourhood Plan.</p> <p>Planning Policy in the National Planning Policy Framework identifies how the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Encouraging communities to become more physically active through walking, cycling, informal recreation and formal sport plays an important part in this process and providing enough sports facilities of the right quality and type and in the right places is vital to achieving this aim. This means positive planning for sport, protection from unnecessary loss of sports facilities and an integrated approach to providing new housing and employment land and community facilities provision is important.</p> <p>It is important therefore that the Neighbourhood Plan reflects national policy for sport as set out in the above document with particular reference to Pars 73 and 74 to ensure proposals comply with National Planning Policy. It is also important to be aware of Sport England's role in protecting playing fields and the presumption against the loss of playing fields (see link below), as set out in our national guide, 'A Sporting Future for the Playing Fields of England – Planning Policy Statement'. http://www.sportengland.org/facilities-planning/planning-for-sport/development-management/planning-applications/playing-field-land/</p> <p>Sport England provides guidance on developing policy for sport and further information can be found following the link below: http://www.sportengland.org/facilities-planning/planning-for-sport/forward-planning/</p> <p>Sport England works with Local Authorities to ensure Local Plan policy is underpinned by robust and up to date assessments and strategies for indoor and outdoor sports delivery. If local authorities have prepared a Playing Pitch Strategy or other indoor/outdoor sports strategy it will be important that the Neighbourhood Plan reflects the recommendations set out in that document and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support the delivery of those recommendations.</p>

	<p>http://www.sportengland.org/facilities-planning/planning-for-sport/planning-tools-and-guidance/</p> <p>If new sports facilities are being proposed Sport England recommend you ensure such facilities are fit for purpose and designed in accordance with our design guidance notes.</p> <p>http://www.sportengland.org/facilities-planning/tools-guidance/design-and-cost-guidance/</p>
<p>Seven Trent Water</p>	<p>I refer to the above Neighbourhood Plan and would like to thank you for giving Severn Trent Water the opportunity to engage in the consultation process but at this stage, on behalf of Severn Trent Water, I have no specific comment to make. I do however appreciate the information in the plan which will help us to plan for the future.</p> <p>Under the provision of the Water Industry Act 1991 we have an obligation to provide capacity for future domestic development and it is usual for us to liaise directly with the Planning Authority and developers to ensure that the required infrastructure is provided at the appropriate time. Nevertheless, the information provided by the plan is most helpful.</p>
<p>Mr Mike Silverman</p>	<p>Policy BP23</p> <p>It is expected that Level 5 of the Code for Sustainable Homes will be a national requirement by 2015. It would be appropriate to include this requirement within Policy BP23, to avoid ambiguity.</p> <p>Village Design Statement</p> <p>There is no mention of renewable energy technology in the revised Village Design Statement. This omission leaves developers without the guidance required by earlier policy statements such as BP23.</p>