

Dear Mr Matheson,

Billesdon Neighbourhood Development Plan Review

Thank you for the opportunity to respond to the Regulation 16 representations. The Qualifying Body's (Billesdon Parish Council) response is as follows:

Plan Period

In most instances the neighbourhood plan period should match that of the relevant Local Plan. However, the Harborough Local Plan has a plan period of 2011-2031 and while there is no problem with planning to 2031, a base date that is now almost 13 years ago lacks credibility.

The 2022 base date has been chosen to reflect the latest [housing land supply](#) position published by Harborough District Council (HDC). This includes at Table B an assessment of the residual housing requirement for Billesdon alongside other Rural Centres and Selected Rural Villages that takes into account the housing provision specified in Local Plan Policy H1. This is reflected in Billesdon Neighbourhood Development Plan Review Policy BPr1 and paragraph 4.9. A more up-to-date housing supply position has not yet been published by HDC.

Contents

There are around 25 'made' neighbourhood plans in Harborough district and we have found none that have a contents page that signposts policies, including the first Billesdon Neighbourhood Development Plan (BNDP). The Parish Council does not believe that a table of contents is relevant to the Basic Conditions.

1 Introduction

The Parish Council agree that there will be several minor (non-material) modifications to the BNDPR following the Examination that can be agreed with the LPA.

2 Profile

The Parish Council agree that there will be several minor (non-material) modifications to the BNDPR following the Examination that can be agreed with the LPA.

3 Sustainable Development and Vision

Paragraphs 3.4 to 3.14 of the BNDPR are essentially the same as the 'vision' set out in paragraphs 2.1 to 2.10 of the 'made' Neighbourhood Plan.

4. Housing

Map 2

The Limits to Development are essentially the same as those in the previous Local Plan other than for revisions that reflect more recent and committed developments.

Land North of 22 Long Lane benefits from planning permission for 'Demolition of existing storage sheds and erection of a single dwelling'. Planning permission was granted on appeal in November 2018. The District Council issued a Certificate of Lawfulness of Existing Development (21/01852/CLU) in December 2021. This confirms that development has commenced in line with the planning permission granted on appeal and therefore the site benefits from planning permission for built development which is protected in perpetuity. It follows that land north of 22 Long Lane should be included within Limits to Development.

Policy BPr1 Housing Requirement

To benefit from NPPF paragraph 14, a neighbourhood plan should contain policies and allocations to meet its identified housing requirement. The inclusion of Policy BPr1 makes it clear that this criterion has been met. A similar policy was included in the BNDP.

It is agreed that the words ‘will be’ at the beginning of the policy’s second sentence could be replaced by ‘is’.

Infill Housing

The Limits to Development should be extended to include the allocated site.

The deletion of the term ‘high-level craft’ is supported.

Gaulby Road Lorry Park

The Gaulby Road Lorry Park measures just 0.16 hectares. At a typical housing density of 30 dwellings per hectare, this equates to 4.8 dwellings. The term ‘at least 5 dwellings’ could have unintended consequences such as the refusal of permission for 4 dwellings or encourage the over-development of the site. The term ‘approximately’ is preferred.

Small sites are currently exempt from mandatory biodiversity net gain.

The Parish Council would support the revision of criterion b to improve clarity.

The Parish Council would support the cross referencing to policies BPr20: Design and Policy BPr21: Climate Change.

Housing Mix

The housing needs of older people has been clarified by the NPPF as encompassing ‘accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.’

Affordable Housing

A local connection test can be applied to all forms of affordable housing including rented, shared-ownership and discounted market tenures (see Planning Practice Guidance paragraph: 008 Reference ID: 70-008-20210524).

The Former Highway Depot (Gaulby Road)

The redevelopment of the former Highway Depot for either a mixed-use development or a Fire and Rescue Station with Training Facility would be acceptable. There is no preference.

As set out in paragraph 5.10, outline planning permission (16/00273/OUT) for 3,630 square metres of business and storage or distribution employment land was approved in March 2017. Although permission has lapsed, there was no objection to the site access or indicative layout (subject to conditions). The indicative site layout shows that the site frontage could be developed for housing in a manner compatible with the redevelopment of the remainder of the site. In any event, the remainder of the site is to be redeveloped for Commercial, Business and Service, and Local Community (Classes E and F2 of the Town and Country Planning (Use Classes) Order 1987 (as amended)) uses. These uses are generally acceptable in residential areas, indeed the Government has enacted a Permitted Development right (Class MA) which enables the conversion of Class E buildings to dwellings.

The proposed residential development is prioritised for self-build or custom-build housing. The Self-build and Custom Housebuilding Act 2015 requires each relevant local authority to keep a register of individuals and groups who are seeking to acquire serviced plots of land in the authority's area for their own self-build and custom housebuilding. Since 2016, the Department has collected information from relevant local authorities in England on self-build and custom housebuilding activity in their areas. The latest [data](#) shows that there is a significant shortfall in provision in Harborough district, but no doubt HDC can provide further information.

HDC's [Self-Build and Custom Housebuilding Corporate Policy](#) makes it clear that Local Plan Policy GD2 allows for self-build or custom-build plots to come forward on sites within or adjoining the built up area of Billesdon.

The phrase 'sold at an appropriate price' will need to be tested at planning application stage, but plots should be made available at a price that is genuinely affordable to self-builders.

It is important for the development to take place in a comprehensive manner to ensure that, for example, the housing element is not 'cherry-picked' for development leaving the remaining site vacant and prone to vandalism. The additional flexibilities built into Policy BPr8 were introduced to secure the redevelopment of the site primarily for business use to provide opportunities for the expansion of existing businesses and the creation of new businesses.

Discussions with the Fire and Rescue Service have indicated that a Training Facility could introduce additional noise, smoke etc. which could adversely affect properties some distance away from the facility unless properly controlled.

Given that there is no existing off-street parking for allotment holders or visitors to the adjoining Woodland Pool, any new provision would be of benefit.

Criterion d is not a new requirement and was included in the BNDP.

Biodiversity net gain (BNG) is mandatory from 12 February 2024. However, there are a variety of exemptions including self-build and custom build applications.

Retention of Key Services and Facilities

Policy HC2 of the Harborough Local Plan aims to protect against the loss of rural services but does not identify the community facilities to be retained. Policy BPr10 supplements Policy HC2 with useful local content.

Infrastructure

Policy BPr12 was included in the BNDP as Policy BP13 with only minor revisions.

Countryside

Policies BPr14 and BPr15 relate to entirely separate matters. Policy BPr14 concerns development in countryside locations (land outside Limits to Development) while Policy BPr15 encourages development to improve access to open spaces whether inside Limits to Development or outside. It is agreed that the words 'Opportunities for' in Policy BPr14 are unnecessary.

Countryside Access

The inclusion of a source for Map 4 is not relevant to the Basic Conditions.

The Parish Council believes that the wording of Policy BPr15 is clear and unambiguous.

Ecology and Biodiversity

Data on Local Wildlife Sites has been supplied by the Leicestershire and Rutland Environmental Records Centre. The inclusion of a source for Map 5 is not relevant to the Basic Conditions.

There are no proposals to declassify Historic Local Wildlife Sites.

Water Management

The Parish Council is supportive of the use of water efficient design of new developments fittings and appliances that encourage higher water efficiency.

The need for lower water consumption standards for new developments is supported by Government. In December 2018, the Government stated the need to a reduction in Per Capita Consumption (PCC) and issued a call for evidence on future PCC targets in January 2019, with an intention of setting a long-term national target. The National Infrastructure Commission (NIC) has already presented a report including recommendations for an average PCC of 118 l/p/d.

Non-Designated Heritage Assets

The inclusion of a source for Map 7 is not relevant to the Basic Conditions.

During the preparation of the BNDP local heritage assets were identified but the Examiner concluded ‘a Neighbourhood Development Plan cannot designate Local Heritage Assets. It is for local authorities to identify such sites.’ It has since become clear that there are several processes through which non-designated heritage assets may be identified, including the neighbourhood plan-making process.

The BNDPR has provided the opportunity to reinstate previously identified local heritage assets and meet national planning practice guidance requirements that ‘Plan-making bodies should make clear and up to date information on non-designated heritage assets accessible to the public to provide greater clarity and certainty for developers and decision-makers.’

BNDPR paragraphs 10.15 to 10.20 set out the community’s approach to the identification of Non-Designated Heritage Assets which is fully in line with Planning Practice expectations that ‘It is important that all non-designated heritage assets are clearly identified as such.’ Further details regarding the Features of Local Heritage Interest are included at Appendix 1.

Other than Muddy Lane and Ridge and Furrow areas, the Non-Designated Heritage Assets identified by Policy BPr19 are already on the Leicestershire & Rutland Historic Environment Record (HER). The inclusion of a site on the HER means that it has already been the subject to research and investigation in accordance with national standards of good practice.

There has been free, public access to the HER for many years. In addition, the Non-Designated Heritage Assets identified by Policy BPr19 have been prepared in consultation with the local community which has including a community newsletter containing information about the Neighbourhood Plan Review that was delivered to all

premises within the Parish. It follows that the owners of prospective non-designated heritage assets have been consulted.

The whole HER record has not been 'ported' into the Neighbourhood Plan. The HER has only been used to identify Features of Local Heritage Interest and Known Archaeological Remains. 'Findspots' such as pottery shards, arrow heads, flint scatters or the scattered remains of early humans that are on the HER are not included in Policy BPr19.

There are 420 households in Billesdon (2021 Census). Policy BPr19 identifies around six buildings as Non-Designated Heritage Assets. It follows that only a minority of buildings in Billesdon have been identified as Non-Designated Heritage Assets.

Design

The three additional design considerations were added because they are not addressed by Billesdon Design Guide.

Climate Change

Reducing and mitigating the effects of climate change was, and remains, a key objective for the Neighbourhood Plan. Policy BPr21 is based on a model policy devised by Nottinghamshire local planning authorities and the Parish Council is not aware of any objections concerning its clarity.

Other

If the Examiner requests further details in connection with these comments or requests clarification on other matters, Billesdon Parish Council would be welcome the opportunity to respond.

Regards

Simon Ford

Chair Billesdon Parish Council