



Ref:

(For official use only)

BREEDON ON THE HILL NEIGHBOURHOOD PLAN

Submission Consultation – Response Form

After assessing responses to the 'Pre-Submission' consultation, Breedon on the Hill Parish Council has now formally submitted the 'Submission' version of the Breedon on the Hill Neighbourhood Plan to North West Leicestershire District Council. In accordance with Section 16 of the Neighbourhood Planning (General) Regulations 2012, we are consulting on the Neighbourhood Plan for six weeks, from **Tuesday 16 July to Tuesday 27 August 2024**.

The submission plan and supporting documents can be viewed at https://www.nwleics.gov.uk/pages/breedon_on_the_hill_neighbourhood_plan

Please complete this form and either email it to planning.policy@nwleicestershire.gov.uk or post it to Planning Policy, North West Leicestershire District Council, PO Box 11051 Coalville, LE67 0FW

We must receive responses must by the end of Tuesday 27 August 2024.

*Including amendment regulations; The Neighbourhood Planning (General) (Amendment) Regulations 2015 and The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016.

PART A – Personal Details

If you are responding on behalf of yourself, or your own organisation, please fill in all the 'Personal Details' fields. If an agent is appointed, please complete only the Title, Name and Organisation boxes in the Personal Details column, but complete all the 'Agent's Details' fields.

	Personal Details	Agent's Details (if applicable)
Title		MRS
First Name		BEVERLEY
Last Name		MOSS
Job Title (where relevant)		ASSOCIATE DIRECTOR
Organisation (where relevant)	BOWSALL DEVELOPMENTS LTD	HOURIGAN PLANNING
Address Line 1	C/O AGENT	10 TH FLOOR, CHANCERY PLACE
Address Line 2		50 BROWN STREET
Address Line 3		MANCHESTER
Address Line 4		
Postcode		M2 2JG
Telephone		██████████
Email address		████████████████████

Do you wish to be notified of the Council's decision on the Neighbourhood Plan proposal?

Yes

No

PART B – Your Representation

In the left column below, please state which part of the Neighbourhood Plan your representation relates to (for example which section, page or policy). In the right column, please submit your comments.

You can comment on as many different parts of the Neighbourhood Plan as you wish (please add more lines if required).

Section, page or Policy (please specify for each comment)

Comments

This Representation should be read in conjunction with our previous Representation dated 11 December 2023 and submitted in respect of the Regulation 14 consultation on the Pre-Submission Version of the Breedon-on-the-Hill Neighbourhood Plan (NP).

Housing Requirement – Paragraphs 9.10-9.11

The Submission version of the NP makes reference at paragraphs 9.10-9.11 to the housing requirement in the district and how this relates to Breedon. The NP states that the District Council has indicated that the housing requirement for Breedon is 13 dwellings (to 2040). The evidence to support this statement is not included in the NP.

The District Council's Housing Land Supply Statement 2024-2029 confirms that the housing requirement is 481 dwellings per annum (dpa) over the Local Plan period. This is in line with Policy S1 (Future housing and economic development needs) which confirms that over the Plan period (2017-2031), provision will be made for the development of a minimum of 9,620 dwellings.

The policy is clear that that housing number is a minimum and should not act as a ceiling to housing growth in the District. Policy S2 of the Local Plan (Settlement Hierarchy) also confirms that Breedon is a 'Sustainable Village' where limited development within the defined Limits to Development can take place.

The Housing Land Supply Statement also notes that evidence prepared for the new Local Plan (HENA June 2022) supports a higher housing requirement of 686 dpa, and this has previously been agreed by the Council (at the Council meeting on 06 September 2022).

The Government's current consultation of the 'Proposed Reforms to the National Planning Policy Framework and other changes to the planning system' (consultation commenced Tuesday 30 July 2024 and closes Tuesday 24 September 2024), includes the proposal to restore the standard method for assessing housing needs, to align more closely with the Government's aspirations for the housing market by supporting growth across the country. For the district of North West Leicestershire, the current method results in a need for at least 357 houses per annum. The proposed updated method would result in the need for 621 houses per annum, a percentage change of + 74%.

	<p>This falls broadly in line with the figure previously agreed by the Council (in September 2022).</p> <p>Whilst this consultation document can only be afforded limited weight at this time, it signals the government’s direction of travel with regard to national planning policy. The relevance of this, is that all the evidence is supporting the view that more housing is required to be delivered in the North West Leicestershire district; this was recognised by the Council in 2022, and falls in line with the Government’s recently published proposed reforms to national planning policy.</p> <p>Regard should also be had of the Government’s recently published Written Ministerial Statement (WMS) – Building The Homes We Need (published on 30 July 2024). The WMS should be afforded substantial weight in the consideration of the draft Neighbourhood Plan, especially the section ‘Delivering More Affordable Homes’ which is of particular relevance to the subject site whereby the SoS confirms the following:</p> <p><i>‘Although increasing supply will be an essential part of improving affordability, we must also go further in building a greater share of genuinely affordable homes. That is why the Government is committed to the biggest growth in social and affordable housebuilding in a generation. As of 2023, there were 3.8 million Social Rent homes – 200,000 fewer than the four million that existed in 2013. According to revised figures we are publishing today, only 110,000 to 130,000 homes are now due to be delivered under the Affordable Homes Programme, down from an aspiration of ‘up to 180,000’ when it was launched. On current plans, delivery is due to decline. We will stop that happening. In the first instance, this Government’s aspiration is to ensure that, in the first full financial year of this Parliament (2025-26), the number of Social Rent homes is rising rather than falling.’</i></p> <p>There is nothing in the adopted Local Plan which limits the number of houses which could be delivered in Breedon, subject to compliance with Policy S2.</p> <p>With this in mind, we question the inclusion of the statements set out at Paragraphs 9.10 & 9.11 of the NP and in the absence of any supporting evidence, suggest that reference to a housing requirement specific to Breedon should be removed from the NP.</p>
<p>Policy BotH14: Housing Requirement. Part B</p>	<p>We wholly support the principle of the inclusion of land at Southworth Road, Breedon-on-the-Hill for the development of housing.</p> <p>The use of the word ‘approximately’ in reference to restricting the number of houses at the proposed allocation site is welcomed, and should be retained in the document as it falls in line with national planning policy.</p>
<p>Paragraph 9.18</p>	<p>It is pleasing that the NP includes reference to the current planning application on the subject site at Land north of Southworth Road – LPA reference</p>

Breedon on the Hill Neighbourhood Plan – Submission Consultation

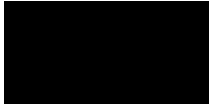
	<p>24/0007/FULM, and that the previous Representation to the Pre-Submission version of the NP satisfied previous concerns regarding access.</p> <p>The Parish Council has reaffirmed its position in respect of the current planning application (in their consultation response dated 12/08/2024) that they do not support the current planning application which proposes 18 no. dwellings and suggest that their concerns could be overcome by 'an improved layout and a smaller-scale development'.</p> <p>As noted in our previous Representation, the current planning application at the site is for a 100% affordable housing scheme, for the delivery of 18 no. homes for social rent, to be managed by emh Group. The layout and proposed housetypes have been revised as a result of detailed discussions with Planning and Urban Design Officers at the Council and it has been demonstrated to the Council how the revised scheme complies with current planning policy in terms of impact of amenity, good design (hard and soft landscaping), car parking provision and impact on matters of flooding and ecology.</p>
<p>Policy BotH16: Land north of Southworth Road, Breedon <u>on</u> the Hill</p>	<p>We support the draft Policy wording, except for criteria D which states '<i>A sustainable drainage strategy for the site in accordance with Policy BotH7 to include an improvement in run-off water rates overall</i>'. This should be reworded so that it is in line with the National Planning Policy Framework in so far as reference to '<i>improvement in run-off water rates overall</i>' should be deleted and replaced with the text '<i>to ensure that flood risk is not increased elsewhere</i>'. The existing text is not clear nor justified - any drainage strategy associated with proposed development at the proposed allocation site should only be expected to mitigate for the development itself and to follow the SuDS Hierarchy.</p>

Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publicly available and may be identifiable to my name / organisation.

I acknowledge that I have read and accept the information and terms specified under the Data Protection and Freedom of Information Statement.

Signed:



FOR HOURIGAN PLANNING.
ON BEHALF OF BOWSALL DEVELOPMENTS LTD

Date: 22/08/2024

DATA PROTECTION AND FREEDOM OF INFORMATION STATEMENT

The personal information you provide on this form will be processed in accordance with the requirements of the Data Protection Act 2018. It will be used only for the preparation of the Breedon on the Hill Neighbourhood Plan as required by the Neighbourhood Planning (General) Regulations 2012*, save for requests of such information required by way of enactment. Your name, organisation and representations will be made publicly available when displaying and reporting the outcome of this statutory consultation stage and cannot be treated as confidential. Other details, including your address and signature, will be treated as confidential.

You should not include any personal information in your comments that you would not wish to be made publicly available.

Further information about the Council's privacy policy and how we collect, store and use your personal data can be found [here](#).

*Including amendment regulations; The Neighbourhood Planning (General) (Amendment) Regulations 2015 and The Neighbourhood Planning (General) and Development Management Procedure (Amendment) Regulations 2016.

**Please send completed forms to planning.policy@nwleicestershire.gov.uk or
Planning Policy Team, NWLDC, PO Box 11051, Coalville, LE67 0FW**

The deadline for responses is the end of Tuesday 27 August 2024.