



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		Please see below
First Name		
Last Name		
Job Title (where relevant)		Please see below
Organisation (where relevant)		Miss Elanor Wright Associate Director Oxalis Planning Mr Gary Lees Consultant Pegasus Group
Address Line 1		Oxalis Planning Toll Bar House Landmere Lane Edwalton NG12 4DG Pegasus Group 4 The Courtyard Church Street Lockington DE74 2SL
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		As above
Telephone		████████████████████ ████████████████████

Breedon on the Hill Neighbourhood Plan – Submission Consultation

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
<p>Policy BotH3: Areas of Separation</p>	<p>We provided our response on Policy BotH3 as part of the Pre-Submission consultation. The reply to our pre-submission response, as set out in the Consultation Statement, notes that the proposed area of separation is to safeguard the landscape setting of existing settlements. It notes that the designation is 'provisional' and would only become active if the new settlement is confirmed, either through a planning application or allocation in the Local Plan. The consequential recommendation is 'no change'.</p> <p>The fact that the designation is provisional and would only apply if the new settlement was to come forward goes to the heart of our objection. The appropriate, logical and sensible place to deal with any settlement character impact concerns is through the Local Plan allocation.</p> <p>Any planning application and detailed design for the Isley Woodhouse new settlement will necessarily require masterplanning. Any scheme will be sensitively designed and, in the usual way, will need to respond to the relevant concerns and constraints before any proposals are approved.</p> <p>The proposed allocation site area for the Isley Woodhouse new settlement (IW1) includes two fields that are proposed as part of the provisional area of separation in the draft NP Policy BotH3.</p> <p>In this context, the inclusion of this policy does not accord with the requirements of the NPPF, by creating unnecessary duplication and constraint for the District Council's proposed allocation.</p> <p>The first basic condition of a Neighbourhood Plan is to have appropriate regard to national policy, with paragraph 16 of the NPPF stating that Plans should:</p> <p style="text-align: center;"><i>"(f) serve a clear purpose, avoiding unnecessary duplication of policies</i></p>

	<p><i>that apply to a particular area (including policies in this Framework, where relevant)”.</i></p> <p>Accordingly, it is the inclusion of these two fields as part of draft Policy BotH3 that this objection seeks to remove from the Neighbourhood Plan in order to meet the basic conditions.</p> <p>As such, we maintain our objection to this policy. Our previous points remain valid and should be appropriately considered in determining the Neighbourhood Plan.</p>
<p>BotH1: Countryside</p>	<p>In line with our representation regarding BotH3, if the area of separation is removed, the land would then automatically fall under Policy BotH1, becoming identified as countryside.</p> <p>Consequently, in order to maintain consistency with the emerging Local Plan, the countryside designation should exclude land proposed to be allocated for the Isley Woodhouse new settlement in the Local Plan. Not doing so would result in the Neighbourhood Plan being in conflict with the emerging Local Plan.</p> <p>Paragraph 29 (30 in the current consultation) of the NPPF states that Neighbourhood Plans should not:</p> <p><i>"promote less development than set out in the strategic policies for the area, or undermine those policies."</i></p> <p>The footnote to the paragraph goes on to state that Neighbourhood Plans <i>"must be in general conformity with the strategic policies contained in any development plan that covers their area."</i></p> <p>In this context, the Neighbourhood Plan should have regard to the proposed strategic allocation of the new settlement of Isley Woodhouse and should be amended to accommodate this to ensure that the Neighbourhood Plan remains relevant in the long term. This could be a provisional designation, coming into force if the new settlement is allocated.</p>
<p>BotH11: Locally Valued Heritage Assets</p>	<p>We also provided a response to this Policy in our Pre-Submission consultation response; however, no change is proposed to the policy. Therefore, the points from our previous response remain, these are:</p> <p>Objection – The policy fails to have regard to national policies in respect of heritage. It incorrectly states that several areas of ridge and furrow mapped on Map 12 are ‘non-designated local heritage assets’.</p> <p>National guidance on the assessment of ridge and furrow, Historic England and Northamptonshire County Council’s 2001 document ‘Turning the Plough’</p>

	<p>gives a methodology for assessing the significance of ridge and furrow earthworks, and applies this to identify 43 Priority Townships where the most significant ridge and furrow is present (Neither Breedon on the Hill nor Tonge are identified as such). The methodology given in this document is clear that ridge and furrow should be considered as township units, rather than individual blocks or other groups of earthworks and, as such, where it is considered to be a non-designated heritage asset, it is the entirety of the earthworks within each township (here Breedon on the Hill or Tonge) that is one asset, and impacts should be assessed on that township asset as a whole.</p> <p>Historic England have not stated that all ridge and furrow is of national importance, nor indeed that all ridge and furrow is a heritage asset – their studies have been clear that different areas of ridge and furrow earthworks have different levels of significance and provide a methodology for the assessment of such significance. That methodology has not been applied here and thus Policy Both11 in respect of ridge and furrow fails Basic Condition a) for preparing Neighbourhood Plans.</p>
--	--

Declaration

I understand that all comments submitted will be considered in line with this consultation, and that my comments will be made publically 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: Elanor Wright

Date: 23rd August 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.