

## **BLABY NEIGHBOURHOOD PLAN**

### **Summary of responses received at Regulation 16 stage (submission)**

The following table sets out a summary of the responses received to the submission consultation of the Blaby Neighbourhood Plan.

All of the responses received were considered by the examiner when preparing her assessment of, and recommended modifications to, the Blaby Neighbourhood Plan.

The following summary of comments received reflects the views put forward by respondents. They have been abridged as faithfully as possible to ensure that the essence of the original representation is fully maintained.

Full versions of the 12 responses received on the Blaby Neighbourhood Plan (along with more information regarding the Neighbourhood Plan) are available to view at: <http://www.blaby.gov.uk/about-the-council/strategies-plans-policies/environment-and-planning/neighbourhood-planning/>

<b>Respondent</b>	<b>Support/Object/ Comment</b>	<b>Summary of response</b>
Andrew Granger (on behalf of Davidsons Development Ltd)	Comment	<p>A number of our comments, contained within our previous submissions, have been acknowledged in the Blaby Neighbourhood Plan Overall Consultation Report and the draft Plan amended. These include allocating land off Lutterworth Road as a Reserve Site through Policy BNP7(b) Reserve Site (S2) and amending the site boundary to reflect an extended reserve site of 4.49 acres. Our requested that a Proposals Plan be included within the Neighbourhood Plan has also been accepted.</p> <p>Given that the allocated/reserve housing sites along with Green Wedge (and other relevant policy designations) have been identified on the Proposals Plan, the settlement boundary and Green Wedge maps should be amended accordingly to show the sites as outside the Green Wedge and within the Settlement Boundary.</p> <p>Whilst we support the site being allocated as a 'reserve' housing site, we request that it should be a formal allocation to provide for flexibility in the plan and assist in meeting housing demand in the wider District.</p> <p>Including the site as a formal allocation will also provide clarity, as it is not clear as to the circumstance that allow a 'reserve site' to be brought forward. If the site is not formally allocated, then details will need to be made available as to the circumstances in which a reserve site should be brought forward.</p> <p>The site has the potential to deliver circa 51 new homes with associated open space and landscaping. The need to provide affordable housing is identified within the Neighbourhood Plan as being of real importance which the scheme could provide subject to viability considerations. Again, we confirm that the site is available and deliverable.</p> <p>To make it clear that the full 4.49 acre site is being allocated, under Policy BNP7 (b) Reserve Site (S2), we request that the original Reserve Site S2 Map 13 is deleted and the sites allocation map for the site is labelled Reserve Site S2 Map 13; the Settlement</p>

		<p>Boundary Plan Map 14 and Proposals Map 15. This would make it clear that it is the full 4.49 acre site that is being allocated for housing and avoid any confusion.</p> <p>The identification of the land off Lutterworth Road as an allocation/reserve site requires a number of other plans/policies to be adjusted so all plans and policies are consistent.</p> <p>Firstly, Character area C Map 4 on page 24 should be amended so that the southern boundary of the character area includes the extended Reserve Site (S2) within the red line.</p> <p>Secondly, in respect of Policy BNP2: Green Wedge, we request that the Green Wedge area be amended to take into account the allocation of the extended Reserve Site (S2). Character Area F Map 8 on page 34 should be amended so that the Green Wedge designation does not cover Reserve Site (S2), as shown for the sites which currently have consent. The boundary of Policy BNP2 should reflect the amended Site Boundary of Reserve Site (S2).</p> <p>At present, the allocation of the site as a 'Reserve Site' and the Green Wedge designation are in conflict. It would assist in the text in respect of the Green Wedge to explain that two sites are allocated on land that has been removed from the Green Wedge.</p> <p>The Blaby Settlement Boundary Map 15 on page 59 is restrictive and contradicts the aims of other policies within the plan, which seek to identify suitable development sites. It is inconsistent with the reserve site identified by Policy BNP7 (b). To ensure the Plan is consistent, the settlement boundary should be amended and redrawn to include the extended Reserve Site (S2) within the settlement boundary.</p> <p>In addition, we do not support the approach at objective 2f and question whether this restriction on development outside of the village boundary is consistent with national guidance which states, '<i>blanket policies restricting housing development... should be avoided</i>'.</p>
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		<p>Finally, we propose that the wording of point 1) of 6.2 Objectives is amended to reflect a positive and proactive approach to the delivery of future homes within Blaby. The wording should be amended to ‘1) <i>To identify a preferred site or sites for housing development that will deliver a mix of housing opportunities across all tenures, including affordable housing to meet local and district wide needs</i>’. The Plan would also benefit from additional supporting text which identifies that once the identified sites have been delivered there will be a future need to identify further suitable sites.</p> <p>We suggest that if the above concerns are addressed, it will result in a clear and comprehensive plan, which will guide development in Blaby over the plan period. The Plan has objectives which are supported, for example the delivery of sustainable development by planning positively for growth, which will significantly boost the supply of new homes. It is evident that it is the intention for the Plan to deliver a flexible strategy however, this could be improved if the above issues are resolved.</p> <p>For completeness, this respondent also attached copies of previous submissions along with their formal Regulation 16 response summarised above. The previous representations are not summarised here, but can be viewed attached to their full Regulation 16 representation available on the Council website.</p>
Davidsons Developments Ltd	Comment & Object	<p>Davidsons Developments Ltd has an interest in land located to the rear of Blaby Hall, which is the subject of a live planning application for residential development. The site to the rear of Blaby Hall represents an opportunity for redevelopment within the heart of the village. Currently, the site detracts from the listed buildings, their setting and the Conservation Area generally.</p> <p>Objective 2f is not supported and it is questioned whether this restriction on development outside of the village boundary is consistent with the guidance in the PPG, which states ‘<i>blanket policies restricting housing development... should be avoided</i>’. There is little or no available land within the settlement boundary to meet future need and therefore, amending the boundary or providing appropriate explanatory text will ensure flexibility in the plan and be responsive to change. In recognition that sites may come forward</p>

		<p>outside the Settlement boundary, it is suggested that the Objective 2f text should be amended to be less restrictive.</p> <p>In respect of Policy BNP1, the proposed development on land rear of Blaby Hall can create a sense of place compatible with adjacent uses appropriate to its location.</p> <p>The site is in close proximity to the Grade II Listed building of Blaby Hall. The development offers an opportunity to enhance the setting of the listed buildings and the conservation area.</p> <p>Policy BNP3 is confusing as currently written. The Proposals Map shows Blaby Hall and the area the subject of Davidson’s application as countryside. The text however focuses on Character Area G Map 9. The text should also refer to Character Area D Map 5, which is of different character and contains areas of previously developed land such as Hall Farm and environs currently the subject of Davidsons planning application.</p> <p>Part of the site on its north eastern boundary is proposed under Policy BNP4 to be designated as Local Green Space (LGS). This land forms part of Davidsons land interest, is private and not accessible for public use. This strip of land should not be designated as LGS, in accordance with NPPF paras. 76 and 77, as it does not form accessible open space of recreational value, has no direct public access through the site and is land associated with the farmyard and environs and not the wider countryside and accordingly is within the currently submitted planning application boundary. It is requested that the LGS boundary line is amended to follow the eastern boundary of Davidson’s application site and that Local Green Space Map 11 under Policy BNP4 is duly amended.</p> <p>The allocation of sites S1 and S2 under Policy BNP7 a) and b) for residential development is commended and will provide certainty in respect of future residential development. Given the limited opportunities identified within the settlement it is critical that the Neighbourhood Plan recognises the importance of further future residential development – references the benefits of the Davidson’s application site.</p>
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Environment Agency	Comment	We commented on the draft submission Plan in October 2016 and found that to be acceptable. In respect of this consultation, I find the Neighbourhood Plan acceptable as submitted and have no further comments to make.
Historic England	Comment	The commitment to protecting the historic environment in the plan is welcomed. We advised that the Planning Policy Guidance identifies Local Green Spaces as, “a way to provide special protection against development for green areas of particular importance

		to local communities”. The identification of the long walk by the community as a Local Green Space should in itself justify inclusion, and provide a level of protection from development broadly consistent with Green Belt.
Leicester City Council	Comment	<p>Our Transport section has the following comments:</p> <ul style="list-style-type: none"> <li>• Overall, the Plan needs to encourage walking, cycling and public transport use.</li> <li>• Proposals for new housing need to ensure that they are well connected with the village for example, walking and cycling routes connecting to existing routes, where possible, and making them attractive and safe for pedestrians and cyclists.</li> <li>• That development has good access to public transport and provides good pedestrian access to bus stops.</li> <li>• Specify what the ‘sustainable transport issues’ are mentioned in Policy BNP6.</li> </ul>
Leicestershire County Council	Support, Object & Comment	<p>Leicestershire County Council is supportive of the Neighbourhood plan process and welcome being included in the consultation.</p> <p><b><u>Planning</u></b> It would be prudent to consider the inclusion of a developer contributions/planning obligations policy, along similar lines to those shown in the draft North Kilworth NP and draft Great Glen NP, adapted to local circumstances. This would enable appropriate local infrastructure and service provision to mitigate the impacts of new development.</p> <p><b><u>Property</u></b> <b>Strategic Property Services</b> The comments set out below are made by the Asset Management Group of Strategic Property Services on behalf of Leicestershire County Council, as a landowner with property interests within the plan area.</p> <p><b><u>Vision and Objectives</u></b>  In principle the vision as set out in the Plan is supported. However, it is considered that a number of objectives and policies contained in the Plan will act to restrict the delivery of future sustainable growth.</p>

	<p>Objective 2c which seeks to protect and enhance existing open spaces and amenities in the way that has been proposed through the designation of land at Hospital Lane for the purposes of Local Green Space contrary to the requirements of para.77 of the NPPF is NOT supported.</p> <p>Objective 2f which seeks to contain any future growth within the existing settlement boundary presents a fundamentally flawed approach to plan preparation that is consistent with the criteria based approach advocated by paragraphs 14 and 49 of the NPPF.</p> <p>It is considered that the Plan's objectives need to be reviewed in order to set out more clearly the overall strategy to be adopted and should align with the wider policy framework. As such they should concentrate on the outcomes. Proposed example is provided.</p> <p><u>Policies</u></p> <p><b>Policy BNP1</b> – Whilst protecting the character and environment of Blaby is seen as desirable, the overall Plan needs to be sufficiently flexible to facilitate the need to bring forward development in sustainable locations. Section 4.4 of the Plan states that land to the north of Hospital Lane should be preserved as open green space. Instead of reflecting the character of the local area through recognising the existing character of development abutting the boundaries of Character Area A, this policy acts to prevent the delivery of sustainable growth opportunities.</p> <p><b>Policy BNP2</b> – The extent of the Green Wedges mirrors that contained within Blaby Local Plan (Core Strategy), which states that 'Green Wedges are important strategic areas'. Weight should be given in prioritising future residential development options to the east of Blaby on land outside this policy designation such as land at Hospital Lane.</p> <p><b>Policy BNP3</b> – The policy fails to reflect the Core Strategy assessment at para. 7.5.11 that due to the constraints imposed by the Green Wedge and floodplain "<i>New Growth is</i></p>
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		<p><i>expected to be delivered on Greenfield sites, with limited opportunities as part of Town Centre redevelopments</i>". In addition the policy should also make reference to the re-use of existing buildings within open countryside to provide additional housing and employment opportunities in order to maintain and enhance the vitality of rural communities as detailed in para. 55 of the NPPF.</p> <p><b>Policy BNP4</b> – The designation of land at Hospital Lane as Local Green Space fails to meet all of the tests required by para. 77 of the NPPF. This policy would act as a constraint for future sustainable growth coming forward contrary to the positive approach required by the NPPF.</p> <p>Para. 007 of the PPG states that 'Designating any Local Green Space will need to be consistent with local planning for sustainable development in the area. In particular, plans must identify sufficient land in suitable locations to meet identified development needs and the Local Green Space designation should not be used to in a way that undermines this aim of plan making'.</p> <p>Further, para. 015 of the PPG states; <i>"Paragraph 77 of the National Planning Policy Framework is clear that the Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, the designation should not be proposed as a 'back door' way to try to achieve what would amount to a new area of Green Belt by another name"</i>.</p> <p>As this area is designated as open countryside in the Core Strategy and contains no sites of national or district level ecological importance being farmland, its proposed designation is wholly inappropriate.</p> <p>The proposed Local Green Space proposed in the Plan extending to 19ha is considered to be an "extensive tract of land" and thus contrary to policy (based on examples given from elsewhere).</p>
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		<p>considers, in detail, all reasonable development alternatives including the land at Hospital Lane in order to comply with statutory requirements.</p> <p>It is concluded that land at Hospital Lane would provide the most sustainable location for new housing. The land is both available, with a willing landowner, and deliverable. The site would be capable of delivering transport links with the Town Centre and deliver significant community benefits including highways infrastructure and the potential extension to Bouskell Park.</p> <p>Given Blaby's status as the "market town" of the district, its local NDP needs to be sufficiently flexible to enable an appropriate level of additional housing to be delivered. Having regard to the inability of other authorities within the HMA, particularly Leicester City, to deliver their objectively assessed needs, there is a strong case to suggest that the FOAN will be higher as unmet needs will be redistributed through the duty to co-operate.</p> <p>An additional consideration is the potential for delivery of housing throughout the district failing to meet target levels. Accordingly, it is suggested that the Plan has sufficient flexibility to facilitate bringing forward part of any such shortfall at Blaby.</p> <p><b>Policy BNP8</b>, which seeks to protect the character of the Conservation Area, is supported.</p> <p><b>Policy BNP9</b>, which encourages good design, is supported.</p> <p><b>Policy BNP10</b> – The policy as drafted would be inconsistent with the requirements of the NPPF if the inclusion of a settlement boundary is used as a mechanism to preclude the delivery of sustainable growth opportunities. This is contrary to the criteria based approach advocated by the NPPF which requires development proposals to be assessed on a case by case basis.</p> <p><b>Employment Land Allocation</b> - It is noted that no additional land has been allocated for</p>
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	<p>employment uses. Such an allocation is essential to providing enhanced business and work opportunities in a sustainable location close to residential areas. It is proposed that sustainable sites be identified to meet future needs.</p> <p><b><u>Adult Social Care</u></b> Reference should be made to recognising a significant growth in the older population and that development seeks to include bungalows etc. of differing tenures to accommodate the increase.</p> <p><b><u>Environment</u></b> LCC would like to see all aspects of the natural environment including climate change, the landscape, biodiversity, ecosystems, green infrastructure, as well as soils, brownfield sites and agricultural land should be covered within the plan.</p> <p>Plans should in as far as possible seek to contribute to and support a reduction in greenhouse gas emissions and increasing the county's resilience to climate change.</p> <p>LCC would like to see the inclusion of a local landscape assessment. We would also recommend that Plans should also consider the street scene and public realm within their communities.</p> <p>Each neighbourhood plan should consider the impact of potential development on enhancing biodiversity and habitat connectivity such as hedgerows and green ways.</p> <p>Neighbourhood Plan groups have the opportunity to plan GI networks at a local scale to maximise benefits for their community and in doing so they should ensure that their Neighbourhood Plan is reflective of the relevant Local Authority Green Infrastructure strategy.</p> <p>Neighbourhood planning groups should check with DEFRA if their neighbourhood planning area includes brownfield sites. Where information is lacking as to the ecological value of these sites then the NP could include policies that ensure such survey work</p>
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		<p>should be carried out to assess the ecological value of a brownfield site before development decisions are taken.</p> <p>High quality agricultural soils should, where possible be protected from development. Neighbourhood planning groups should consider mapping agricultural land classification within their plan.</p> <p>Consideration of community facilities would be welcomed, along with policies which seek to protect and retain them, support the independent development of new facilities and protect Assets of Community Value.</p> <p>Economic development aspirations would also be welcomed within the Plan. 7.8.1 partly covers the vision for the future of the 1970s infrastructure, but could be enhanced to include design, style, signage aspirations of the community.</p> <p>consideration for developers to make provision in all new houses (regardless of the size of development) for putting in place superfast broadband infrastructure.</p>
Member of Public (1)	Support	<p>I particularly welcome the policies on heritage protection and enhancement of the shopping centre. Policy BNP4 on Local Green Space designation of the Long Walk area is especially welcomed. It is a green space with heritage and recreational value that is especially important and valuable to the local community.</p> <p>Recent planning history of the proposed LGS site has confirmed development here would not be at all appropriate. It would not be sustainable and would run counter to local and national policy. Hence designation of it as LGS would not harm the potential for future sustainable growth.</p>
Member of Public (2)	Support	<p>Strong support for the Plan. The Plan reflects the wishes of the local community. I feel that this is balanced document within which, the objectives firmly underline the importance of protecting the environment, character and heritage of Blaby, whilst outlining the visions to develop the town centre and incorporating flexibility for some sustainable housing provision if necessary.</p>

		<p>Most important objective is that all new development is restricted to within the settlement boundary to protect the Green Wedges and Countryside.</p> <p>Support for the proposed Local Green Space designation and the value of this area to the local community expressed.</p>
Member of Public (3)	Support	We would like to confirm our approval of the plan. In particular, we support the conservation of the heritage area around old Blaby, Bouskell Park, the Hall and the Long Walk. Preservation of this area is essential to maintaining the distinctive nature of the village.
National Federation of Gypsy Liaison Groups	Object	There is an ongoing requirement for permanent Gypsy and Traveller pitches in Blaby district. This is an important consideration in neighbourhood planning. Para. 7.9 and Policy BNP 10 are wholly unacceptable and in conflict with the Blaby Core Strategy. Various types of development are necessarily located outside settlement boundaries as is recognised in the Blaby Core Strategy, and this includes sites for Travellers.
Natural England	Comment	Natural England does not consider that the plan will have any significant effects on any internationally or nationally designated nature conservation sites and welcomes the broad principles of the plan and some of the specific policy proposals. It is consistent with the National Planning Policy Framework and set within the context of Blaby District Council's existing Core Strategy and emerging Local Plan.
Sport England	Comment	<p>It is essential that the neighbourhood plan reflects and complies with national planning policy for sport as set out in the National Planning Policy Framework, with particular reference to paras. 73 and 74.</p> <p>A neighbourhood planning body should look to see if the relevant local authority has prepared a playing pitch strategy or other indoor/outdoor sports facility strategy. It is important that a neighbourhood plan reflects the recommendations and actions set out in any such strategies, including those which may specifically relate to the neighbourhood area, and that any local investment opportunities, such as the Community Infrastructure Levy, are utilised to support their delivery.</p> <p>Where such evidence does not exist, relevant planning policies in a neighbourhood plan</p>

		<p>should be based on a proportionate assessment of the need for sporting provision in its area.</p> <p>Any new housing developments will generate additional demand for sport. If existing facilities do not have capacity to absorb the additional demand, planning policies should ensure new sports facilities, or improvements to existing ones, are secured and delivered.</p> <p>Consideration should be given to how any new development, particularly new housing, will provide opportunities for people to lead healthy lifestyles and create healthy communities. Active Design provides ten principles to help ensure the design and layout of development encourages and promotes participation in sport and physical activity.</p>
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