

Housing Statement

Thank you to everyone who commented on the Regulation 14 version of the Neighbourhood Plan for Bagworth, Thornton and Stanton-under-Bardon. We have taken all of the comments into account and amended the Neighbourhood Plan ready for submission to HBBC.

As a result of these comments there is a significant change to the Neighbourhood Plan which we wanted to bring to your attention.

It has been decided to remove all of the residential allocations from the Neighbourhood Plan. There is no requirement for neighbourhood plans to allocate sites for residential development, but those that do secure greater powers to resist inappropriate development in more sensitive areas.

We have not taken this decision lightly, however the housing requirement for our two parishes has increased dramatically as the Neighbourhood Plan has been prepared. It is now at a level that neither parish can sustain and we believe that continuing with this approach would require the identification of many more housing sites which we do not think is sustainable locally. We believe that we have been given an unachievable and unrealistic housing target by HBBC which cannot be met, and we have therefore chosen to remove all allocations from the Neighbourhood Plan and to revert to the Settlement Boundaries in the Local Plan. At the same time, we have committed to review the Neighbourhood Plan at the earliest opportunity and at a time when the housing requirement is finalised so that there is certainty about what level of housing is needed.

When BT&SuB took the decision to prepare a Neighbourhood Plan, the housing requirement for the neighbourhood area was 133 new dwellings up to 2036. This was made up of a requirement of 89 dwellings in Bagworth and Thornton and 44 in Stanton-under-Bardon.

The newly formed Housing Theme Group, comprising a mixture of Parish Councillors and residents from across the two parishes enthusiastically embraced the challenge of meeting this housing requirement and appointed an independent consultant to lead them through the process of determining the most suitable sites to be allocated in the Neighbourhood Plan to meet the housing requirement in a way that was most appropriate to the local communities.

An assessment was made of HBBCs latest (2018) Strategic Housing and Economic Land Availability Assessment (SHELAA). 10 potential development sites came forward through this process.

In order to capture the full range of potential sites, the Parish Councils undertook their own 'Call for Sites' in October 2019, writing to all landowners and stakeholders with land close to the villages. This resulted in a further three sites coming forward for assessment, 13 in total.

Each site was assessed against 26 criteria, such as site capacity, topography, distance to village centre etc. and marked red, amber or green against each.

As a result of this exercise, provision was made for around 90 new dwellings through four residential allocations in the Neighbourhood Plan. Taking into account the 81 dwellings with a planning consent or having already completed, this provided for 171 dwellings against the minimum target of 133. An allowance for windfall added considerably to this total and greatly

exceeded the minimum requirement. The Neighbourhood Plan also included a Reserve Site policy, identifying a site in Stanton-under-Bardon for around a further 50 dwellings in the event that the allocated site in that parish failed to come forward.

This process concluded and the Neighbourhood Plan was prepared for pre-submission consultation. A delay was experienced as HBBC required a Heritage Impact Assessment to be undertaken to assess the impact of development on a site in Thornton on a nearby Grade II Listed Building.

However, as the Neighbourhood Plan was being finalised, HBBC updated their advice in relation to the minimum housing requirement for parishes in the Borough.

A note sent to Parish Councils in November 2020 proposed an approach based on apportioning the overall borough housing need to parishes based on the share of population in those parishes, whilst encouraging Qualifying Bodies to explore options to set their own figures.

However, simultaneously to this, Planning Officers were also writing to Parishes undertaking Neighbourhood Plans to say that setting out evidence to justify a different housing requirement would be 'difficult to justify' and 'carries significant risk that the NP will not be supported by an Examiner.'

The new figures proposed by HBBC based on an apportionment of the Borough population came as a shock to the Neighbourhood Plan group.

The residual housing requirement (target figure minus approvals and completions) that the Neighbourhood Plan had been working to of 52 dwellings up to 2036 had been replaced with a housing requirement of 305 dwellings across the Neighbourhood Area up to 2039. Approvals and completions reduced this figure only by 12 dwellings, leaving a net housing requirement of 293.

So, the housing requirement for the Neighbourhood Area jumped from 52 to 293, an increase of over 550%.

This was considered to be a completely unsustainable figure to meet, especially with the Neighbourhood Plan being at an advanced stage. Any increase in housing allocations would inevitably require a further SEA Screening and potentially a full SEA, and a need to re-run Regulation 14 consultation. It was also noted that HBBC continued to state that 'the new Local Plan may set out significantly different housing figures for each area than shown in the table'. There was, therefore a very real prospect of the Neighbourhood Plan allocating a much higher number of houses than would ultimately be required. Whilst the Neighbourhood Plan group embraced fully the opportunities to meet its housing requirement, and indeed exceed it, by identifying suitable sites where development would be acceptable to the local communities, it was another thing entirely promoting what could amount to significantly more housing than would be needed locally, with the consequent harmful impact on community facilities and amenities.

The Neighbourhood Plan group met to consider the options available to it and were demoralised and downbeat, having thought they had positively responded to the opportunities

presented to it to promote sustainable development locally, but having the goalposts moved at such a late stage in the process.

The options were as follows:

Continue with the allocations in the Regulation 14 version of the Neighbourhood Plan. It was recognised, however, that despite the methodology used by HBBC to arrive at the housing requirement of 293 being crude and widely recognised as only a starting point for the determination of a sophisticated and meaningful housing requirement, this option would be objected to by HBBC and likely to fail at examination.

Argue that constraints to delivery demonstrate the need for a reduced target figure for the Neighbourhood Area. There was some support for this approach, but the group did not have confidence given the communication coming from HBBC that a reduced figure would be found that was acceptable to the Borough Council, resulting in further objections and failure at examination.

Allocate more sites in the Neighbourhood Plan to meet the revised housing requirement. There was no appetite or energy for this option, given that the figure being put forward by HBBC was 'subject to significant change' and that the Neighbourhood Plan would need to repeat Regulation 14 consultation and potentially undertake a full SEA, depending on the location of the new allocations.

Delay the preparation of the Neighbourhood Plan until the Local Plan was Made and the housing requirement confirmed. This option failed to receive support as it was considered that halting the process now would make it very difficult to re-start the process in what could be up to two years' time, or more, and that the motivation for doing so was likely to be lacking – understandable given that it had taken four years to reach this point in the process.

Withdraw the allocated sites from the Neighbourhood Plan and commit to a review once the housing requirement is finalised through the new Local Plan. This was unanimously the preferred option, although the decision to move forward on this basis was made with a heavy heart amongst all of those present. It was felt that the group had no viable alternative.

Agreement was reached to amend the draft Plan prior to submission to HBBC with no housing allocations, leaving the decision as to where future housing will go to HBBC based on the other housing policies in the Neighbourhood Plan relating to housing mix, windfall, Affordable Housing and design. An early review of the Neighbourhood Plan will provide an opportunity to allocate sites to meet the housing requirement once finalised and to secure the additional protection that is afforded neighbourhood plans that meet their housing requirement by including housing policies and allocations in line with Paragraph 14 of the NPPF.

This decision was reinforced when, on 30 June 2021, HBBC published its Consultation Draft Local Plan which contained a completely different methodology for calculating housing requirements on a parish-by-parish basis. On this new calculation, there is a further increase in housing which is needed across the Neighbourhood Area – the figure increasing to 450. The final meeting of the Steering Group to agree the responses to Regulation 14 consultation endorsed the decision to withdraw the allocated sites.

