

Melton Borough Council – Regulation 16 Response Form

Please use this form to submit your comments for the Neighbourhood Plan and return the form to: planningpolicy@melton.gov.uk.

For each representation, please use a separate form and mark clearly which document and part your representation relates to.

PART A: About you & Examination

1. What is your name?
2. What is your email?
3. Please enter your address

4. Are you a resident of the area that this Neighbourhood Plan relates?
(please tick Yes/No)

Yes No

5. If you answered 'No' above, please select from the appropriate option below
(tick or mark 'Yes' for all that apply)

An Agent

Developer

Landowner

Stakeholder

Consultee

Other

If you have selected any of the above, please give additional information here, including who you represent:

Representations on Waltham on the Wolds and Thorpe Arnold Neighbourhood Plan made on behalf of K and A Watchorn and Sons

PART B: Representation Form 1

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates

Which document does this relate to (e.g. submission plan, policy map)

Waltham on the Wolds and Thorpe Arnold Neighbourhood Plan – Submission Plan

Page Number (if applicable)

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Paragraph/policy (if applicable)

Policy S1 – Limits to Development

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning polices	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development Do you?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support this policy/part of the plan	<input checked="" type="checkbox"/>	Support this policy/part of the plan subject to modifications	<input type="checkbox"/>
			Object to this policy/part of the plan
			Neither support or object to this policy/part of the plan

Please provide your comments here:

PART B: REP 1 - Comments

Policy S1 defines limits to development for both Waltham on the Wolds and Thorpe Arnold. The plan explains that the purpose of the limits to development is to ensure that sufficient sites for new homes and economic activity are available in appropriate locations.

For Waltham on the Wolds, the land at Fair Farm to the west of Melton Road is included in the proposed limits to development. This is supported as it appropriately reflects the relationship of land to adjoining built development.

The northern part of the land at Fair Farm has consent for the development of 45 new homes, with the southern portion the subject of a current application to provide a further 60 dwellings.

We have made separate representations that the northern part of the site be shown as a commitment and the southern part included as an allocation for housing development to meet future housing requirements in the village, reflecting the proposed allocation in the Melton Local Plan.

Please suggest any amendments here:

PART B: REP 1 - Suggestions

None.

PART B: Representation Form 2

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates

Which document does this relate to (e.g. submission plan, policy map)

Waltham on the Wolds and Thorpe Arnold Neighbourhood Plan – Submission Plan

Page Number (if applicable)

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Paragraph/policy (if applicable)

Policy H1 – Housing Provision

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning polices	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development Do you?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Support this policy/part of the plan	<input type="checkbox"/>	Support this policy/part of the plan subject to modifications	<input type="checkbox"/>
		Object to this policy/part of the plan	Neither support or object to this policy/part of the plan
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please provide your comments here:

PART B: REP 2 - Comments

Policy H1 advises that, having regard to the number of dwellings already constructed plus existing sites with planning permission and allowing for allocated draft Local Plan sites within the Limits to Development, the Parish has exceeded its housing requirement over the Plan period.

The text to the policy notes that the allocations within the draft Submission Local Plan that are located within the Limits to Development meet the housing target for the Parish, coupled with recent planning approvals.

The land at Fair Farm is included within the proposed Limits to Development which are supported and is proposed for allocation in the Submission Draft Melton Local Plan to provide 106 dwellings. The Local Plan allocation WAL2 includes the northern part of the site already granted consent and the southern part the subject of the current outline application (ref 16/00847/OUT).

The reference to allocated draft Local Plan sites is an addition to the policy and text from the Regulation 14 consultation version of the plan and is supported.

However, for clarity it is considered that the Neighbourhood Plan should include a Proposals Map and that this should show the existing residential commitments, including the northern part of the land at Fair Farm with consent for 45 dwellings and also identify as an allocation the southern part of the Fair Farm site to provide 60 dwellings. This would provide a clearer indication of the Neighbourhood Plan's strategy for delivering housing over the plan period and demonstrate its consistency with the submission draft Melton Borough Local Plan.

Please suggest any amendments here:

PART B: REP 2 - Suggestions

Amend Neighbourhood Plan to include a Proposals Map which shows the committed sites with planning permission and show as an allocation the southern portion of the land at Fair Farm to provide for 60 dwellings in accordance with the Draft Local Plan allocation.

PART B: Representation Form 3

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates

Which document does this relate to (e.g. submission plan, policy map)

Waltham on the Wolds and Thorpe Arnold Neighbourhood Plan – Submission Plan

Page Number (if applicable)

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Paragraph/policy (if applicable)

Policy H2 – Housing Mix

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning polices	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development Do you?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Support this policy/part of the plan	<input type="checkbox"/>	Support this policy/part of the plan subject to modifications	<input type="checkbox"/>
		Object to this policy/part of the plan	Neither support or object to this policy/part of the plan
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please provide your comments here:

PART B: REP 3 - Comments

Policy H2 Housing Mix advises that new housing developments should provide for a mixture of dwellings and that dwellings of 3 bedrooms or fewer and single-storey accommodation suitable for older people will be supported.

The Draft Melton Borough Local Plan includes a policy on housing mix indicating that the Council will seek to manage the delivery of a mix of house types and sizes having regard to market conditions, housing needs and economic viability.

It is important that any policies on housing mix are not applied prescriptively without taking proper account of relevant factors in relation to market conditions, housing need and the economic viability of a site. Otherwise further development in the parish is likely to be frustrated.

The policy should therefore make reference to issues of market conditions, housing needs and economic viability as factors to be taken into account in relation to considering the appropriate mix on new housing sites.

Whilst the management of housing mix for affordable housing units is appropriate, for private sector housing, ultimately the market will determine the appropriate housing mix on a site. If the sizes of units proposed on a site are in demand locally they will sell. If not the development will need to adjust the mix to reflect the local market demand.

The policy should be amended to refer to the need to have regard to market conditions, housing needs and economic viability in considering the appropriate housing mix on a site.

Please suggest any amendments here:

PART B: REP 3 - Suggestions

Amend policy text as follows;

“New housing development proposals should provide a mixture of housing types specifically to meet identified needs in Waltham on the Wolds and Thorpe Arnold, **having regard to market conditions, housing needs and economic viability.**”

PART B: Representation Form 4

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates

Which document does this relate to (e.g. submission plan, policy map)

Waltham on the Wolds and Thorpe Arnold Neighbourhood Plan – Submission Plan

Page Number (if applicable)

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Paragraph/policy (if applicable)

Policy H3 – Affordable Housing Provision

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure				
Meets European Obligations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Has regard to national Planning polices	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>				
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>				
Contributes to the achievement of sustainable development Do you?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>				
Support this policy/part of the plan	<input type="checkbox"/>	Support this policy/part of the plan subject to modifications	<input type="checkbox"/>	Object to this policy/part of the plan	<input checked="" type="checkbox"/>	Neither support or object to this policy/part of the plan	<input type="checkbox"/>

Please provide your comments here:

PART B: REP 4 - Comments

Policy H3 sets out a requirement for new housing developments of 10 or more dwellings to provide 32.4% affordable housing. This reflects the revised Local Plan policy which, based on up-to-date evidence, sets a target of 32% affordable housing in the Value 2 Area which includes Waltham on the Wolds.

The policy adds little to the draft policy in the Local Plan and therefore should be deleted.

Please suggest any amendments here:

PART B: REP 4 - Suggestions

Delete Policy H3.

PART B: Representation Form 5

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates

Which document does this relate to (e.g. submission plan, policy map)

Waltham on the Wolds and Thorpe Arnold Neighbourhood Plan – Submission Plan

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Paragraph/policy (if applicable)

Policy ENV4: Protection of other Sites of Environmental (natural or historical) Significance

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development Do you?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Support this policy/part of the plan	<input type="checkbox"/>	Support this policy/part of the plan subject to modifications	<input type="checkbox"/>
		Object to this policy/part of the plan	Neither support or object to this policy/part of the plan
		<input checked="" type="checkbox"/>	<input type="checkbox"/>

Please provide your comments here:

PART B: REP 5 - Comments

Policy ENV4 identifies sites of local significance for wildlife and/or history and indicates that the protection and enhancement of the identified significant features will be supported.

On behalf of K and A Watchorn and Sons, Pegasus Group made representations to the Regulation 14 consultation arguing that the land at Fair Farm does not merit designation under this policy. In support of our submission we included a report on Ridge and Furrow by CgMs. This report concludes that the ridge and furrow identified in the Plan is ill defined, assigned an inappropriate level of communal and educational value and has not been properly assessed. The proposal to safeguard the land at Fair Farm under Policy ENV4 is therefore not justified.

The Parish Council response to representations on the policy at the Regulation 14 consultation stage suggests that the proposed designation does not rule out development but seeks to ensure that any identified features are taken into account. With the amendment to Policy H1, recognising the contribution both existing permissions and land within the limits to development allocated in the Local Plan make towards meeting housing requirements, designation of the land at Fair Farm under Policy ENV4 is inconsistent with this approach.

The Neighbourhood Plan variously proposes the designation and protection of Local Green Spaces (Policy ENV1), Other Sites of Environmental Significance (Policy ENV4), and Ridge and Furrow (Policy ENV/11). This approach to the designation of a multiplicity of land safeguarding policies is unnecessarily complex and overly restrictive. It is an approach that is not supported by the NPPF.

The NPPF refers to the identification of Local Green Space and sets out clear and limiting criteria for the types of spaces that could qualify for designation. The Submission Draft Neighbourhood Plan concludes that only a limited number of sites would merit safeguarding as Local Green Space, but then seeks to safeguard those sites that do not merit safeguarding as a Local Green Space through other designations. There is no national planning policy basis for the application for this multiplicity of safeguarding designations. This approach is unacceptable and these additional safeguarding policies should be deleted.

Please suggest any amendments here:

PART B: REP 5 - Suggestions

Remove land at Fair Farm from designation under Policy ENV4 and delete the policy.

PART B: Representation Form 6

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates

Which document does this relate to (e.g. submission plan, policy map)

Waltham on the Wolds and Thorpe Arnold Neighbourhood Plan – Submission Plan

Page Number (if applicable)

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Paragraph/policy (if applicable)

Policy ENV11 Ridge and Furrow Fields

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning polices	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development Do you?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Support this policy/part of the plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support this policy/part of the plan subject to modifications	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Object to this policy/part of the plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Neither support or object to this policy/part of the plan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide your comments here:

PART B: REP 6 - Comments

Policy ENV11, Ridge and Furrow Fields identifies areas of ridge and furrow as non-designated heritage assets and that any harm arising from a development will need to be balanced against their significance as heritage assets.

We previously made submissions at the Regulation 14 consultation stage objecting to the identification of the land at Fair Farm as one of these areas. In granting planning permission for development on part of the Fair Farm site, the Council undertook this balancing exercise and concluded that the development of the site for residential purposes was acceptable. The principle of residential development on the northern part of the site is therefore established.

We remain of the view that the Neighbourhood Plan does not provide any robust assessment of the ridge and furrow in support of the policy. For completeness we have attached the report by CgMs submitted as part of the Regulation 14 representations. This concludes that the ridge and furrow has been assigned an inappropriate level of communal and educational value in the plan.

The land at Fair Farm should be removed from designation under Policy ENV11.

Please suggest any amendments here:

PART B: REP 6 - Suggestions

Remove land at Fair Farm from designation under Policy ENV11.

PART B: Representation Form 7

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates

Which document does this relate to (e.g. submission plan, policy map)

Waltham on the Wolds and Thorpe Arnold Neighbourhood Plan – Submission Plan

Page Number (if applicable)

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Paragraph/policy (if applicable)

Policy ENV13 – Footpaths and Bridleways

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning polices	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development Do you?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Support this policy/part of the plan	Support this policy/part of the plan subject to modifications	Object to this policy/part of the plan	Neither support or object to this policy/part of the plan
<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please provide your comments here:

PART B: REP 7 - Comments

Policy ENV13 has been amended to include reference to appropriate mitigation in relation to development proposals resulting in the loss of or having a significant adverse effect on the existing footpath network. The text referring to the incorporation of a path into new development as a significant adverse effect has also been removed. These changes to the policy are supported.

For the land at Fair Farm, the consented site and current application integrate the routes of the existing public rights of way E99/1 and F1/1 as part of the development, with areas of open space aligned with the footpath routes wherever possible.

Please suggest any amendments here:

PART B: REP 7 - Suggestions

None.

PART B: Representation Form 8

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates

Which document does this relate to (e.g. submission plan, policy map)

Waltham on the Wolds and Thorpe Arnold Neighbourhood Plan – Submission Plan

Page Number (if applicable)

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Paragraph/policy (if applicable)

Policy E1 – Retention of Existing Employment Opportunities

2. Do you believe that this policy/section of the Neighbourhood Plan:

	Yes	No	Unsure
Meets European Obligations	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning polices	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Is in general conformity with the Strategic policies of the Local Plan/is compatible with adjoining Neighbourhood Plans	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development Do you?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
Support this policy/part of the plan	<input type="checkbox"/>	Support this policy/part of the plan subject to modifications	Object to this policy/part of the plan
<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Neither support or object to this policy/part of the plan
			<input type="checkbox"/>

Please provide your comments here:

PART B: REP 8 - Comments

Policy E1 refers to the safeguarding of existing employment opportunities. In response to the Regulation 14 consultation, we made representations arguing that existing employment sites subject to this safeguarding policy, including the Fairfield Industrial Estate, should be identified on a Proposals Map for clarity. This is consistent with the approach in local plans where sites to be subject to employment land safeguarding are clearly identified on a Proposals Map.

Please suggest any amendments here:

PART B: REP 8 - Suggestions

Land to be safeguarded as existing employment land under Policy E1, including land at Fairfield Industrial Estate, should be identified on a Proposals Map. The area to be identified is shown on the plan below.

