

Melton Borough Council - Regulation 16 Response Form

Under Regulation 15 of the Neighbourhood Planning (General) Regulations 2012, **Asfordby Parish Council** has submitted its draft Neighbourhood Plan to Melton Borough Council. In accordance with Regulation 16, Melton Borough Council would like to invite comments from organisations and individuals on the submitted Neighbourhood Plan. All background documents are available to view on the <https://www.meltonplan.co.uk/asfordby> webpage.

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 representations relates to.

PART A: About you & Examination

1. What is your name?

Ksenia Mironenko

2. What is your email?

ksenia.mironenko@deeley.co.uk

3. Please enter your address

George House, Herald Avenue, Coventry CV5 6UB

4. Are you a resident of the area that this Neighbourhood Plan relates?

Yes No

5. If you answered 'No' above, please select from the appropriate option below

Agent

Developer

Landowner

Stakeholder

Consultee

Other

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

The form is submitted on behalf of Deeley Homes who has an active presence in the area.

Do you wish to be notified of the local planning authority's decision under Regulation 19 in relation to the Neighbourhood Development Plan? Yes

NOTICE: Melton Borough Council will process the information you provide in a manner that is compatible with the General Protection Regulations (GDPR), 2018. Please be aware that all representations received by the authority will be made publicly available (in due course). These will be identifiable by name and organisation (if applicable).

PART B: Representation Form (1)

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates (e.g. submission plan, policy map)

Submitted Neighbourhood Plan

Page number (if applicable)

Page 11

Paragraph/policy (if applicable)

Policy A1: Area of Separation

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 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Do you?

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:

It is Deeley's view that the proposed approach taken in the APNP to define the exact extent of the Areas of Separation is contrary to the strategic policies in the Melton Local Plan (MLP) and thereby does not meet the fifth basis condition, which requires neighbourhood plans to be in general conformity with the strategic policies in the development.

Policy A1 and the proposal to define the exact extent of the Areas of Separation is contrary to Policy EN4. Policy EN4 is a strategic policy as confirmed by Paragraph 1.8.5 of the MLP and the APNP should be in conformity with it.

Policy EN4 does not seek to define the extent of Areas of Separation and instead allows a site by site assessment to be undertaken based on the criteria included in the policy. The explanation for this approach is set out in the supporting text at Paragraph 7.4.3 and the approach proposed by the APNP is in direct contravention of this:

“7.4.3 Areas of Separation (AoS) do not have a defined boundary because their purpose is not to prevent all development within the AoS, but rather to prevent development which would result in coalescence and harm to individual settlement character. They are not landscape designations, but rather areas which are identified as being particularly vulnerable to the effects of development”.

Please provide your suggestions below:

Policy A1 of the APNP should be deleted and Areas of Separation removed from the related maps. At the very least, development within these areas should not be specifically excluded.

PART B: Representation Form (2)

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates (e.g. submission plan, policy map)

Submitted Neighbourhood Plan

Page number (if applicable)

Page 32

Paragraph/policy (if applicable)

Settlement Boundary

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 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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Do you?

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

Please provide your comments here:

It is Deeley's view that the settlement boundary for Asfordby should be amended to include Local Green Space 2 – Jubilee Park. The other three Local Green Spaces proposed for Asfordby are all included in the settlement boundary, including those also on the edge of the settlement. We can see no justification for a different approach to this Local Green Space, which would already benefit from additional protection due to its proposed designation.

Please provide your suggestions below:

For consistency, Local Green Space 2 should also be included within the settlement boundary.

PART B: Representation Form (3)

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates (e.g. submission plan, policy map)

Submitted Neighbourhood Plan

Page number (if applicable)

Page 41

Paragraph/policy (if applicable)

Policy A14: First Homes

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	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Do you?

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

Please provide your comments here:

The policy sets a cap of £83,000 on First Homes at a first sale price. This is contrary to the definition of affordable housing in the Framework. The focus in the Framework is on providing a discount on the market value of the home. This allows for variation in the value based on the size and location of the home. An artificial cap could limit delivery of larger homes and is not consistent with the approach taken in the Framework to focus on a discount against the market value.

Criteria B seeks to restrict entry level exception sites from Areas of Separation. Such an approach is contrary to Policy EN4 and C5 of the MLP. Policy EN4 supports a site by site assessment in Areas of Separation against the spatial criteria include in the policy to ensure

the fundamental objective of Areas of Separation are achieved (i.e. preventing coalescence and protecting the character of settlements). The tenure of the housing being proposed makes no difference when making the assessment under policy EN4. Instead the consideration is focused on the scale, form and spatial arrangement of the dwellings. This additional in the neighbourhood plan would restrict the operation of this strategic policy.

Please provide your suggestions below:

- Reference to the £83,000 should be removed from the APNP. Suggestion for local income levels evidence is unsubstantiated and would add ambiguity to the planning process.
- Criteria B should be deleted.

PART B: Representation Form (4)

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates (e.g. submission plan, policy map)

Submitted Neighbourhood Plan

Page number (if applicable)

Plan 42

Paragraph/policy (if applicable)

POLICY A15: Affordable Housing

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 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	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Do you?

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:

Similarly to the previous comment, Policy A15 Criteria B excludes Rural Exception sites from Areas of Separation. Such an approach is contrary to Policy EN4 and C5 of the MLP. Policy EN4 supports a site by site assessment in Areas of Separation.

Please provide your suggestions below:

Criteria B should be deleted

PART B: Representation Form (5)

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates (e.g. submission plan, policy map)

Page number (if applicable)

Paragraph/policy (if applicable)

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

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<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 type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

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 type="checkbox"/>	Neither support or object to this policy/part of the plan <input type="checkbox"/>
--	--	--	--

Please provide your comments here:

Please provide your suggestions below:

PART B: Representation Form (6)

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates (e.g. submission plan, policy map)

Page number (if applicable)

Paragraph/policy (if applicable)

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

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<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 type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

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 type="checkbox"/>	Neither support or object to this policy/part of the plan <input type="checkbox"/>
--	--	--	--

Please provide your comments here:

Please provide your suggestions below:

PART B: Representation Form (7)

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates (e.g. submission plan, policy map)

Page number (if applicable)

Paragraph/policy (if applicable)

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

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<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 type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

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

Please provide your comments here:

Please provide your suggestions below:

PART B: Representation Form (8)

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates (e.g. submission plan, policy map)

Page number (if applicable)

Paragraph/policy (if applicable)

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

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<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 type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

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

Please provide your comments here:

Please provide your suggestions below:

PART B: Representation Form (9)

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates (e.g. submission plan, policy map)

Page number (if applicable)

Paragraph/policy (if applicable)

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

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<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 type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

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

Please provide your comments here:

Please provide your suggestions below:

PART B: Representation Form (10)

1. Please indicate which part of the submitted Neighbourhood Plan or supporting documents this representation relates (e.g. submission plan, policy map)

Page number (if applicable)

Paragraph/policy (if applicable)

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

	Yes	No	Unsure
Meets European Obligations	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Has regard to national Planning policies	<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 type="checkbox"/>	<input type="checkbox"/>
Contributes to the achievement of sustainable development	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Do you?

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 type="checkbox"/>	Neither support or object to this policy/part of the plan <input type="checkbox"/>
--	--	--	--

Please provide your comments here:

Please provide your suggestions below: