

Response ID ANON-4BMN-AHBT-G

Submitted to **Broughton and Dalby - Reg 16 Consultation**
Submitted on **2017-08-04 17:06:05**

About you

1 What is your name?

Name:

Colin Wilkinson

2 What is your email address?

Email:

colin@planit-x.co.uk

3 Please select the type of respondee you are responding on behalf of below (tick all that apply)

Agent (B)

If you selected 'B', please give additional information here, including who you represent, if applicable:

Mrs Grey

4 Address

Address:

Planit-X Town and Country Planning Services
21 New Road
Burton Lazars

6 All consultations are made available for public view. Personal information such as address and email will not be published with your response. Please confirm you understand and agree to this, by ticking the box below.

Yes, I agree to publish my response

Representation 1

1 Would you like to submit a representation?

Yes

Representation Form 1

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

Which document does this representation relate - (for example Submission Plan, Policy Map, etc). :

Broughton and Old Dalby Parish Neighbourhood Plan: Submission Version

Page Number (if applicable). :

Paragraph/Policy (if applicable) :

H2

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

Do you believe that this Neighbourhood Plan. - Meets European obligations.:

Do you believe that this Neighbourhood Plan. - Has regard to national planning policies.:

No

Do you believe that this Neighbourhood Plan. - Is in general conformity with the strategic policies of the Local Plan/Is compatible with adjoining Neighbourhood Plans:

Do you believe that this Neighbourhood Plan. - Contributes to the achievement of sustainable development.:

No

Do you :

Object to this policy/part of the plan

Comments:

Planit-X acts on behalf of Mrs Grey, the principal owner of the Old Dalby Station Road reserve housing site as identified on page 20 of the Submission Plan. The site is the subject of Policy H2.

In December 2016, Broughton and Old Dalby Parish Council were advised of Mrs Grey's intention to submit a planning application for residential development on the site. On 27 March 2017, an outline planning application for residential development of up to 80 dwellings, associated infrastructure and landscaping on the site was registered (17/00397/OUT). As part of the application a range of supporting reports and surveys were submitted including an illustrative masterplan, flood risk assessment, biodiversity surveys, contamination assessments, noise impact assessment and transport assessment. The site is brownfield and the planning application is due to be determined soon.

At no point has my client been consulted on the proposed Neighbourhood Plan. This is evidenced by the Parish Council's own Consultation Statement. National Planning Policy Guidance (048 Reference ID: 41-048-20140306) states that 'landowners and the development industry should be involved in preparing a draft neighbourhood plan'. It is clear that in relation to the preparation of policy H2, the Neighbourhood Plan has failed to have regard for national planning guidance. The identification of our client's land as a suitable site for housing development is welcomed. The technical assessments supporting the planning application demonstrate that the site can be developed successfully and the Neighbourhood Plan agrees with that conclusion. Development would be consistent with the presumption that brownfield land is suitable for housing unless there are clear and specific reasons to the contrary (Housing White Paper 'Fixing our broken housing market') and the NPPF objective of encouraging the effective use of land by reusing land that has been previously developed, provided that it is not of high environmental value.

Indeed, the proposed development would provide several economic, social and environmental benefits, not least a significant boost to the area's supply of houses. The Neighbourhood Plan at 6.2.3 recognises some of these benefits.

Indeed, there is no logic in preventing these benefits from being brought forward as soon as possible. The Plan fails to identify a reason for withholding the development of this site especially as the housing requirement set out in Policy H1 is expressed as a minimum provision.

Further, Policy H2 places an artificial cap on the scale of development. No evidence has been provided to justify the 42 houses limit or the harm that would result if this were to be exceeded. Indeed, the illustrative masterplan associated with the planning application demonstrates that the application site is capable of being developed for up to 80 dwellings. Again it is important to note that the housing requirement set out in Policy H1 is expressed as a minimum provision.

Finally, the requirement for a 'professional environmental contamination survey' to be undertaken is unnecessary as one has already been supplied as part of the planning application. A noise assessment has concluded that noise attenuation bunds are not necessary.

Please suggest any amendments to the plan/policy here. :

The Plan should not proceed to referendum until the requirement for the involvement of landowners and the development industry in preparing the draft neighbourhood plan has been met.

Policy H2 should be amended as follows:

- 1 Criterion a and b should be deleted to allow the site to come forward as soon as possible;
- 2 The artificial limit of '42 houses' should be replaced by 'around 80 dwellings';
- 3 The need for a 'professional environmental contamination survey' be deleted; and
- 4 There should be no reference to 'noise attenuation bunds'.

3 Please upload a file for supporting evidence below.

File upload:

Planning Statement.pdf was uploaded

Representation 2

1 Would you like to submit another representation?

Yes

Representation Form 2

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

Which document does this representation relate - (for example Submission Plan, Policy Map, etc) . :

Page Number (if applicable) :

Paragraph/Policy (if applicable) :
Policy H5

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

Do you believe that this Neighbourhood Plan. - Meets European obligations.:

Do you believe that this Neighbourhood Plan. - Has regard to national planning policies.:
No

Do you believe that this Neighbourhood Plan. - Is in general conformity with the strategic policies of the Local Plan/Is compatible with adjoining Neighbourhood Plans:
No

Do you believe that this Neighbourhood Plan. - Contributes to the achievement of sustainable development.:

Do you :
Object to this policy/part of the plan

Comments:

On 13 July, Melton Borough Council published changes to the new Melton Local Plan. Focused Change 6 provides a replacement Section 5.8 and Policy C4 which concern the delivery of Affordable Housing. In the Neighbourhood Plan Area the proposed new minimum target for affordable homes within housing developments on all sites of 11 or more units is 25%.
Our own assessment concludes that whilst the need for social and affordable rented housing in the area is apparent doubt is cast upon the desirability of providing it due to the lack of facilities offered locally and the difficulty of accessing essential healthcare services and affordable shopping. The evidence also suggests that due to the low values generated by Old Dalby's residential sector and the limited financial capacity of potential younger purchasers, the financial headroom for affordable housing and CIL subsidies is limited. This is exacerbated in the case of the proposed reserve site allocation where there are contamination and other remediation costs.

Please suggest any amendments to the plan/policy here. :

Policy C4 be amended so that the minimum target for affordable homes within housing developments on all sites of 11 or more units is 25%.
Policy C4 should clarify that the minimum target for affordable homes should not apply the 'reserve site allocation'.

3 Please upload a file for supporting evidence below.

File upload:
No file was uploaded

Representation 3

1 Would you like to submit another representation?

Yes

Representation Form 3

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

Which document does this representation relate - (for example Submission Plan, Policy Map, etc) .:
General

Page Number (if applicable) .:

Paragraph/Policy (if applicable) .:

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

Do you believe that this Neighbourhood Plan. - Meets European obligations.:

Do you believe that this Neighbourhood Plan. - Has regard to national planning policies.:
No

Do you believe that this Neighbourhood Plan. - Is in general conformity with the strategic policies of the Local Plan/Is compatible with adjoining Neighbourhood Plans:

Do you believe that this Neighbourhood Plan. - Contributes to the achievement of sustainable development.:

Do you :
Object to this policy/part of the plan

Comments:

National planning policy requires that all plan policies are supported by appropriate evidence (Reference ID: 41-040-20160211). However, despite occasional references to an 'evidence base' in the Neighbourhood Plan, the only supporting evidence available on the Parish Council's website is a 2014 Housing Needs Survey (which is not even referred to in the Plan document). The apparent lack of local evidence means that many Neighbourhood Plan policies simply defer to the Pre-Submission Melton Local Plan. The consequence being that the Neighbourhood Plan policies either duplicate policies at a higher level or otherwise fail to reflect and respond to the unique characteristics and planning context for the neighbourhood area (PPG Neighbourhood Planning How should the policies in a neighbourhood plan be drafted? Reference ID: 41-041-20140306).

In any event, references to the Pre-Submission Melton Local Plan are now out of date as on 13 July Melton Borough Council published changes to the new Melton Local Plan. These changes have a direct affect many of the Neighbourhood Plan policies.

Finally, reliance upon the emerging Melton Local Plan's policies as a basis for determining housing provision, housing mix, affordable housing, Limits to Development etc. is fundamentally flawed as the emerging Melton Local Plan is still in the early stages of preparation and has not been subject to independent examination. The draft neighbourhood plan is not tested against the policies in an emerging Local Plan.

Please suggest any amendments to the plan/policy here. :

Many of the Neighbourhood Plan's policies will need to be deleted or amended as they are either:

1 unsupported by appropriate evidence;

2 fail to reflect and respond to the unique characteristics and planning context for the neighbourhood area; or

3 are seeking to conform to an emerging Melton Local Plan.

Representation 4**1 Would you like to submit another representation?**

No

Upload a file**1 Please upload a file for supporting evidence below.****File upload:**

No file was uploaded

Examination

1 If you believe this Neighbourhood Plan should be examined through hearings, please indicate why you believe this to be necessary below.

If you believe this Neighbourhood Plan should be examined through hearings, please indicate why you believe this to be necessary below. :

2 Do you wish to be notified of the Council's decision to make or refuse to make the neighbourhood development plan? (Please tick one box only)

Yes