



# Frisby on the Wreake Neighbourhood Plan



**Regulation 14 Consultation Comments**  
**Date: 6<sup>th</sup> May 2017**



## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

### Introduction

This document is submitted to Melton Borough Council as part of the statutory consultation process under NPPF Planning Regulation 15. It provides the consultee responses to the pre-submission version of the Neighbourhood Plan for Frisby on the Wreake and the changes that have been made to the plan prior to submission under Regulation 16.

A 6 weeks duration Regulation 14 consultation on the pre-submission plan ended on March 21st 2017. Local Green Space letters were sent to landowners in February 2016 as part of that consultation and correspondence is included herein in the second part of the document.

Responses were received from residents of the parish, both resident and non-resident landowners, statutory consultees, developers and their agents. The PC in conjunction with the parish Neighbourhood Planning Advisory Committee, have formulated responses to the comments made and these are included in full in the pages that follow.

A table showing the summary of responses is presented below:

<b>Status</b>	<b>Number of Responders</b>
*Resident	<b>24</b>
Statutory Consultee	<b>6</b>
Resident Stakeholder	<b>1</b>
Resident Landowner	<b>2</b>
**Non-Resident Landowner	<b>1</b>
Developer on behalf of a resident landowner	<b>3</b>
<b>Total</b>	<b>37</b>

\*Includes residents who are resident stakeholders and landowners because general resident comments have also been made.

\*\*Non-Resident Landowner is defined as someone who is not on the Frisby on the Wreake electoral role.

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Parish residents have been thanked for their comments via individual replies from the Clerk to the Parish Council. Information has also been provided to all respondents as to how to access this document on the PC web site.

### General

No.	Plan section/ policy number	Comments	From	Response	Proposed amendment	
1		<ol style="list-style-type: none"> <li>1. Good first try,</li> <li>2. Maps too small</li> <li>3. Always told to keep it simple and this document doesn't – it needed an editor and lacks balance.</li> <li>4. In the interests of costs is it necessary to provide the summary as this information is available if required. This section must have doubled costs which would have been better spent elsewhere e.g. church roof village hall kitchen. The document is heading in the right direction.</li> </ol>	John Greaves	<p>Noted and your comments have been most valuable.</p> <p>With regard to costs, the community has compiled the document and various business owners have born the costs of printing, staff time, etc. for free. The assumption that a key section has in fact doubled the costs is incorrect. The FPC have managed to secure funding from Locality and Awards for All to support the production of the NP and all associated costs. These funds are specific to the NP.</p>	<b>No change</b>	<b>Resident</b>
2.		Found it easy to understand, thorough in its presentation and it fairly represents the village. Will be supportive of the findings	Bob Widdowson	Noted and your comments have been very helpful thank you	<b>No change</b>	<b>Resident</b>
3.		At first glance to anyone not knowing the village, its residents' feelings or the parish	David Cook	The NP was a community led activity that took 342 days between the	<b>No change</b>	<b>*Non Resident</b>

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		council, a very impressive looking piece of work. For everyone else, and In brief, a very rushed, uninformed, poorly researched, pre-mediated piece of fiction which will hopefully be seen for what it is.		formation of NPAC and Reg 14, involving more than 80 residents who have created 4 unique pieces of robust evidence to support and underpin the findings of the NP. Expert consultants have advised throughout and it is a document founded on evidence.		<b>Landowner</b>
4.		Frisby Neighbourhood Plan Group should be congratulated for producing this Neighbourhood Plan, Asfordby Parish Council supports the contents of the draft Neighbourhood Plan	Asfordby Parish Council	Noted and thank you for your support	<b>No change</b>	<b>Statutory Consultee</b>
5.		I would like to thank the Neighbourhood Plan team for producing such a thorough and professional document, I'm sure it's not been an easy task! I support this document fully and hope it will achieve some protection for our village	Mrs Michelle Pond	Noted and thank you for your support	<b>No change</b>	<b>Resident</b>
6.		Thank you for consulting The Coal Authority on the above. Having reviewed your document, I confirm that we have no specific comments to make on it. Should you have any future enquiries please contact a member of Planning and Local Authority Liaison at The Coal Authority using the contact details above.	The Coal Authority	Noted	<b>No Change</b>	<b>Statutory Consultee</b>
7.		I found the document to be both extremely comprehensive and very	Mr John Lovesay	Noted and thank you for your support	<b>No Change</b>	<b>Resident</b>

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		representative of the village view regarding the need to expand. Many are concerned that removing the village envelope has opened a door to huge expansion. This draft plan recognises that Frisby can move forward but, with sensible control, still retain its village identity. Congratulations to all involved in its compilation.				
8.		We have just read the Draft Neighbourhood Plan and would firstly like to thank all those who worked so hard to produce what is a very professional and comprehensive document. We completely agree with its contents and conclusions, especially with regards to the proposed limits of development.	G & L Chidlow	Noted and thank you for your support	<b>No Change</b>	<b>Resident</b>
9.		I shall certainly be voting in favour of adopting the plan when the time comes and thank you to all who have obviously devoted much time and effort in putting it together.	Chris Lawman	Noted and thank you for your support	<b>No Change</b>	<b>Resident</b>
10.		The plan as a whole contains a wealth of information and is professionally-produced. As such, it is a glowing testament to the hard work and attention to detail of NPAC. Recent comments on the Frisby Futures Facebook page seem to miss the point that to be adopted our Neighbourhood Plan must align with the	Ash Howe	Noted and thank you for your support	<b>No Change</b>	<b>Resident</b>

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		Melton Local Plan, so any discussion regarding the belief that 78 houses is too many for our village is aiming at the wrong target, and indeed can be categorised as “crying over spilt milk”. We as a community definitely need a Neighbourhood Plan to have any say in the future of the village that we all live in and enjoy, and as such this plan meets our needs. I shall, therefore, be voting for its acceptance, whilst accepting that it should be a living document, and also being aware that care for our village is an ongoing activity, which I, for one, am keen to contribute to.				
11.		A very thorough piece of painstaking hard work for which much praise needs to be given to NPAC.	Simon Blake	Noted and thank you for your support	<b>No Change</b>	<b>Resident</b>
12.		I have reviewed the plan and feel that it is a very well-considered and thoroughly researched document which addresses the areas of concern for the village. I agree with the views that have been expressed concerning: the limiting of the housing development to the two sites mentioned (off Great Lane and the brown field site off Rotherby Lane); the issues of flooding; environmental aspects; transport; social amenities and educational provision. There has clearly been a lot of hard work put in	Neil Knatt	Noted and thank you for your support	<b>No Change</b>	<b>Resident</b>

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		by many individuals in the preparation of the plan which is much appreciated				
13.		I would like to agree with the village plan.	Jim Beeton	Noted and thank you for your support	<b>No Change</b>	<b>Resident</b>
14.		This is an excellent document which accepts change within the village as long as it is done reasonably and helps the village to retain its character and function in the way it should. The most important issue is the size of development in the next 20 years and to increase the size of the village by more than one third in this time would be disastrous in so many ways. With developers seemingly determined to destroy the village concept that has served the community so well it is important that we call on the Planning Committee and Melton Council Officers to help retain the democratic planning principals and policies which this plan adopts so adeptly.	Brian Howes	Noted and thank you for your support	<b>No Change</b>	<b>Resident</b>
15.		Having read the DNP I feel that it provides a balanced approach to the future development needs of the village whilst preserving the 'village' values considered important by all the villagers. The plan also allows for the requirements imposed by local government regarding the provision of additional housing within the village.	G Anderson	Noted and thank you for your support	<b>No change</b>	<b>Resident</b>
16.		There needs to be a strong focus on addressing the provision of safe access to	S Heaney	Noted safety is of paramount importance and the PC have flagged	<b>No change</b>	<b>Resident</b>

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		<p>any developments. Both with traffic entering/leaving the village from the A607 and within the village itself. I am not sure the existing proposed site submissions deal with the extreme traffic issues we have – these were highlighted in the traffic surveys. Access at Main St / Water Lane junction is especially dangerous and also the single track of Gaddesby lane, which is single track and will be used for the Great Lane development access. Traffic calming measures on all entrances to the village would be very welcome.</p>		<p>and will continue to do so on any applications that are deemed necessary.</p>		
	P28	<p>The NP needs to ensure there is a provision of a children’s play area – accessible to the wider community of the village and not just situated within any new developments. Could land to the left of the village hall car park be purchased with developer’s community funds to ensure a play area in the heart of the village?</p>		<p>Noted and this and is an important area, policy H9 updated.</p>		<p><b>NP updated Policy H9 “Children’s play areas for existing and new developments”</b></p>
	P38	<p>A School ‘walking bus’s initiative could be investigated and implemented with funds from developers. This would encourage children within all areas of the village to walk to school safely and dissuade parents from driving their children up Hall Orchard Lane to drop off at school. This could also</p>		<p>Noted NP to be updated</p>		<p><b>NP update community action CATR1 “the PC to approach the school governors to</b></p>



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		<p>offer a part time employment role.</p> <p>I would question the need to expand the Primary School if the proposed 78 houses are built. The figures quoted within this NP state that currently 62% of pupils attending the school are from outside the catchment area, therefore I would suggest the school will need to, over a number of years, redress the balance ensure the priority is given to village/catchment children. This will then reduce the volume of school drop off / pick up traffic as the number of pupil attending are from the village itself and should be encouraged to walk to school!</p> <p>The NP should ensure the housing developments are phased in over a 20-year period and not rushed through to hit the MBC targets for housing in the next 5 years or 5-10years.</p> <p>Construction traffic and noise will have an enormous negative impact on the community and every effort should be made to minimise heavy, construction traffic from travelling through the heart of the village whilst the developments are built. The safety of residents must be carefully considered – does this fall within the remit of the NP?</p>		<p>Noted LEA responsibility</p> <p>Noted discussions have taken place with MBC but the PC are unable to change National Policy</p> <p>Noted but not part of planning policy</p>	<p><b>initiate discussions regarding a walking bus initiative”</b></p> <p><b>No change</b></p> <p><b>No change</b></p>	
17.	Conclusions	7.1 Richborough Estates comments on the	Richborough	Summary of comments made and		<b>Developer</b>

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	and Summary	draft NP policies can be summarised as follows: Policy H1: Housing Provision Policy H2: Housing Allocations Policy ENV9: Areas of Separation Policy ENV2: Protection of other sites of environmental (natural and historical) significance Appendix A: Guidelines for Building Design 7.10 Richborough Estates do not wish to raise any concern with Appendix A with the important exception of the suggested guideline of a buffer zone of 50 to 100 metres between new development and adjacent housing. With regard to the size of the proposed housing sites and the need to integrate new development with the existing village, a buffer zone of this magnitude is considered wholly inappropriate and unrealistic and should be reconsidered.	Estates	captured above. Each comment has already been responded to in the relevant section		<b>on behalf of a resident landowner</b>
18.		Here are my comments on the neighbourhood plan. The plan mentions that we have a well-stocked shop, but it is necessary to commute for main grocery shopping. It talks about local employment within the village. I really don't think that if I wanted a job in the village I would find one. I would have to commute, travelling in a car	L Manship	Noted and thank you for your support		<b>Resident</b>

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	<p>as I have done for years. The bus service is totally unreliable and is not useful for people travelling to work. I believe the bus stop and shelter on the A607 is highly dangerous to get to and wait at and has indeed been totally destroyed by traffic crashing into on two occasions in recent years - I would hold the council responsible for anyone injured there. It is necessary to provide affordable housing but people who need affordable housing are not likely to afford a car and will need to use the bus stop on the A607 to travel to work.</p> <p>Being a trained school teacher does not guarantee you work in the school! It may provide some employment but not necessarily for people within the village. It talks of a lot of people who are self-employed but this could happen in whatever community you live in whether urban or a village like Frisby. I don't know where the Tree Surgery Business is, as I have had a tree surgeon from further afield to work on the trees on my land.</p> <p>On page 47 I totally agree that the village must have a local green space.</p> <p>If vehicular access to the site South of the village is made available along Rotherby Lane the biodiversity of this area will be severely adversely affected. There are</p>				
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	<p>blackbirds, sparrows, several varieties of finches, woodpeckers, foxes, hedgehogs to name a few along with sightings of two varieties of bats. This would also turn Rotherby Lane into a busy road taking away the resident's rights to peace and quiet in their community. This is an older part of the village that would be spoilt by extra traffic.</p> <p>Page 17 Water Lane site - traffic will be even more congested along Water Lane than it is now. The view beautiful views across the valley will be gone and ruined for ever if planning for this goes through. It is really important that Frisby protects the trees that remain as land owners seem to be felling increasing numbers of trees possibly to make way for more houses. The is disastrous for the biodiversity and beauty of the village (Community Action CAENV2).</p> <p>I would like to thank the team of dedicated people who have contributed and worked very hard on this document for the benefit of residents in our rural country village, that Melton Borough Council seem to be set on turning into a series of housing estates. I strongly believe that Frisby like Hoby and surrounding villages is not sustainable and to build hundreds of</p>				
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		houses will spoil a beautiful, community known for its friendliness.				
19.		Overall a really good read, apologies for only finding time to skim read but really appreciate all the hard work that's gone into this. Well done to all involved, you have my utmost admiration and while I may not agree with everything contained within, you have clearly tried to consider all relevant issues	Sarah Meadows	Noted and thank you for your support	<b>No change</b>	<b>Resident</b>
20.		The plan as a whole articulates a sound vision for the parish, striking a reasonable balance between development and conservation. Aspects of the plan would benefit from more detail and greater transparency, as the maps used in the draft plan are not of good enough quality to make best sense of them.	Professor J Paavola	Noted and thank you for your support	<b>NP changes to maps made</b>	<b>Resident Landowner</b>
21.		Leicestershire County Council is supportive of the Neighbourhood plan process and is pleased to be consulted on Frisby on the Wreake's Neighbourhood Plan. <b>Highways</b> <b>General Comments</b> The County Council recognises that residents may have concerns about traffic conditions in their local area, which they feel may be exacerbated by increased traffic due to population, economic and development growth.	LCC Highways	Noted and thank you for your support and general comments.  We would value and find useful a comment from LCC regarding the traffic generated by 78 houses in relation to the narrow lanes supplying the parish and the congested internal village roads.	<b>No change</b>	<b>Statutory Consultee</b>

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	<p>Like very many local authorities, the County Council's budgets are under severe pressure. It must therefore prioritise where it focuses its reducing resources and increasingly limited funds. In practice, this means that the County Highway Authority (CHA), in general, prioritises its resources on measures that deliver the greatest benefit to Leicestershire's residents, businesses and road users in terms of road safety, network management and maintenance. Given this, it is likely that highway measures associated with any new development would need to be <b>fully</b> funded from third party funding, such as via Section 278 or 106 (S106) developer contributions. I should emphasise that the CHA is generally no longer in a position to accept any financial risk relating to/make good any possible shortfall in developer funding.</p> <p>To be eligible for S106 contributions proposals must fulfil various legal criteria. Measures must also directly mitigate the impact of the development e.g. they should ensure that the development does not make the existing highway conditions any worse if considered to have a severe residual impact. They cannot unfortunately be sought to address existing problems.</p>				
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	<p>Where potential S106 measures would require future maintenance, which would be paid for from the County Council's funds, the measures would also need to be assessed against the County Council's other priorities and as such may not be maintained by the County Council or will require maintenance funding to be provide as a commuted sum.</p> <p>With regard to public transport, securing S106 contributions for public transport services will normally focus on larger developments, where there is a more realistic prospect of services being commercially viable once the contributions have stopped i.e. they would be able to operate without being supported from public funding.</p> <p>The current financial climate means that the CHA has extremely limited funding available to undertake minor highway improvements. Where there may be the prospect of third party funding to deliver a scheme, the County Council will still normally expect the scheme to comply with prevailing relevant national and local policies and guidance, both in terms of its justification and its design; the Council will also expect future maintenance costs to be covered by the third-party funding. Where</p>				
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		<p>any measures are proposed that would affect speed limits, on-street parking restrictions or other Traffic Regulation Orders (be that to address existing problems or in connection with a development proposal), their implementation would be subject to available resources, the availability of full funding and the satisfactory completion of all necessary Statutory Procedures.</p> <p><b>Flood Risk Management</b></p> <p>The County Council are fully aware of flooding that has occurred within Leicestershire and its impact on residential properties resulting in concerns relating to new developments. LCC in our role as the Lead Local Flood Authority (LLFA) undertake investigations into flooding, review consent applications to undertake works on ordinary watercourses and carry out enforcement where lack of maintenance or unconsented works has resulted in a flood risk. In April 2015 the LLFA also became a statutory consultee on major planning applications in relation to surface water drainage and have a duty to review planning applications to ensure that the onsite drainage systems are designed in accordance with current legislation and guidance. The LLFA also</p>		<p>Noted deep concern remains across all the proposed sites. We are concerned that the LLFA database does not contain all flooding events that have occurred in Frisby have not necessarily been reported. Frisby residents remain concerned that some proposed sites could make flooding issues worse for existing properties.</p>	<p><b>No change</b></p>	
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		<p>ensures that flood risk to the site is accounted for when designing a drainage solution.</p> <p>The LLFA is not able to:</p> <ul style="list-style-type: none"> <li>• Prevent development where development sites are at low risk of flooding or can demonstrate appropriate flood risk mitigation.</li> <li>• Use existing flood risk to adjacent land to prevent development.</li> <li>• Require development to resolve existing flood risk.</li> </ul> <p>When considering flood risk within the development of a neighbourhood plan, the LLFA would recommend consideration of the following points:</p> <p>Locating development outside of river (fluvial) flood risk (Flood Map for Planning (Rivers and Sea)).</p> <p>Locating development outside of surface water (pluvial) flood risk (Risk of Flooding from Surface Water map).</p> <p>Locating development outside of any groundwater flood risk by considering any local knowledge of groundwater flooding.</p> <p>How potential SuDS features may be incorporated into the development to enhance the local amenity, water</p>				
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		<p>quality and biodiversity of the site as well as manage surface water runoff. Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk.</p> <p>All development will be required to restrict the discharge and retain surface water on site in line with current government policies. This should be undertaken through the use of Sustainable Drainage Systems (SuDS). Appropriate space allocation for SuDS features should be included within development sites when considering the housing density to ensure that the potential site will not limit the ability for good SuDS design to be carried out. Consideration should also be given to blue green corridors and how they could be used to improve the bio-diversity and amenity of new developments, including benefits to surrounding areas.</p> <p>Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. The LLFA recommend that existing watercourses and land drainage (including watercourses that form the site boundary) are retained as open features along their original flow</p>				
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	<p>path, and are retained in public open space to ensure that access for maintenance can be achieved. This should also be considered when looking at housing densities within the plan to ensure that these features can be retained.</p> <p>LCC in our role as LLFA will object to anything contrary to LCC policies.</p> <p>For further information it is suggested reference is made to the <a href="#">National Planning Policy Framework (March 2012)</a>, <a href="#">Sustainable drainage systems: Written statement - HCWS161 (December 2014)</a> and the <a href="#">Planning Practice Guidance webpage</a>.</p> <p><b>Planning</b></p> <p><b>Developer Contributions</b></p> <p>If there is no specific policy on Section 106 developer contributions/planning obligations within the draft Neighbourhood Plan, it would be prudent to consider the inclusion of a developer contributions/planning obligations policy, along similar lines to those shown for example in the Draft North Kilworth NP and the draft Great Glen NP albeit adapted to the circumstances of your community. This would in general be consistent with the relevant District Council's local plan or its policy on planning obligations in order</p>				
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		<p>to mitigate the impacts of new development and enable appropriate local infrastructure and service provision in accordance with the relevant legislation and regulations, where applicable.</p> <p><a href="http://www.northkilworth.com/wp-content/uploads/2016/01/nk-draft-low-resolution-1.pdf">www.northkilworth.com/wp-content/uploads/2016/01/nk-draft-low-resolution-1.pdf</a></p> <p><a href="http://www.greatglen.leicestershireparishcouncils.org/uploads/175670305aeaf48650823074.pdf">www.greatglen.leicestershireparishcouncils.org/uploads/175670305aeaf48650823074.pdf</a></p> <p><b>Mineral &amp; Waste Planning</b></p> <p>The County Council is the Minerals and Waste Planning Authority; this means the council prepares the planning policy for minerals and waste development and also makes decisions on mineral and waste development.</p> <p>Although neighbourhood plans cannot include policies that cover minerals and waste development, it may be the case that your neighbourhood contains an existing or planned minerals or waste site. The County Council can provide information on these operations or any future development planned for your neighbourhood.</p> <p>You should also be aware of Mineral Consultation Areas, contained within the adopted Minerals Local Plan and Mineral</p>				
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	<p>and Waste Safeguarding proposed in the new <a href="#">Leicestershire Minerals and Waste Plan</a>. These proposed safeguarding areas and existing Mineral Consultation Areas are there to ensure that non-waste and non-minerals development takes place in a way that does not negatively affect mineral resources or waste operations. The County Council can provide guidance on this if your neighbourhood plan is allocating development in these areas or if any proposed neighbourhood plan policies may impact on minerals and waste provision.</p> <p><b><u>Education</u></b></p> <p>Whereby housing allocations or preferred housing developments form part of a Neighbourhood Plan the Local Authority will look to the availability of school places within a two mile (primary) and three mile (secondary) distance from the development. If there are not sufficient places then a claim for Section 106 funding will be requested to provide those places. It is recognised that it may not always be possible or appropriate to extend a local school to meet the needs of a development, or the size of a development would yield a new school. However, in the changing educational landscape, the</p>				
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	<p>Council retains a statutory duty to ensure that sufficient places are available in good schools within its area, for every child of school age whose parents wish them to have one.</p> <p><b><u>Property</u></b>  <b>Strategic Property Services</b>          No comment at this time.</p> <p><b><u>Adult Social Care</u></b>          Suggest reference is made to recognising a significant growth in the older population and look for developments to include bungalows etc of differing tenures. This would be in line with the draft Adult Social Care Accommodation Strategy for older people which promotes that people should plan ahead for their later life, including considering downsizing, but recognising that people's choices are often limited by the lack of suitable local options.</p> <p><b><u>Environment</u></b>          No comment at this time.</p> <p><b><u>Communities</u></b>          We welcome the inclusion of policies with the plan that have taken into account the below comments previously made. Consideration of community facilities in the draft Plan would be welcomed. We would suggest where possible to include a</p>		<p>Noted provision for bungalows has been encouraged in the NP</p> <p>Noted. Community Facilities have been supported by Policies CF1 'Retention of Community Facilities and Amenities', and Policy CF2 'New or Improved Community Facilities'. The two areas of privately-owned parish allotments are included in</p>	<p><b>No change</b></p> <p><b>No change</b></p> <p><b>No change</b></p>	
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	<p>review of community facilities, groups and allotments and their importance with your community. Consideration could also be given to policies that seek to protect and retain these existing facilities more generally, support the independent development of new facilities and relate to the protection of Assets of Community Value and provide support for any existing or future designations.</p> <p>The identification of potential community projects that could be progressed would be a positive initiative.</p> <p><b><u>Economic Development</u></b></p> <p>We would recommend including economic development aspirations with your Plan, outlining what the community currently values and whether they are open to new development of small businesses etc.</p> <p><b><u>Superfast Broadband</u></b></p> <p>We welcome the inclusion of a broadband policy within the plan that has taken into account the below comments previously made.</p> <p>High speed broadband is critical for businesses and for access to services, many of which are now online by default. Having a superfast broadband connection is no longer merely desirable, but is an essential requirement in ordinary daily life.</p>		<p>other policies.</p> <p>Thank you for your support.</p>		
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		<p>All new developments (including community facilities) should have access to superfast broadband (of at least 30Mbps) Developers should take active steps to incorporate superfast broadband at the pre-planning phase and should engage with telecoms providers to ensure superfast broadband is available as soon as build on the development is complete. Developers are only responsible for putting in place broadband infrastructure for developments of 30+ houses. As some of your proposed sites fall below this threshold, consideration for developers to make provision in all new houses regardless of the size of development should be considered. We welcome the inclusion of a broadband policy within the plan that has taken into account the below above comments.</p> <p><b>NIK GREEN (MRS)</b> Policy Officer 21 March 2017</p>				
22.		<p>General comments about the plan: We are relative newcomers to the village (July 2016) and have arrived during this consultation. Unfortunately, the nature of my work entails time away from home during the week, my wife running her own business</p>	Shaun Groom	The possibility of holding PC meetings on a Saturday has been added onto the next PC meeting agenda		<b>Resident</b>



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	<p>and a young family means that we find it very difficult to attend the weekday evening Parish meetings. A consideration maybe to look at holding some of these meetings during a Saturday? This may allow us and other working age members of the community with families to participate in a more meaningful way. We do feel extremely let down by the parish council and the apparent complete u turn on the objections to the planning application lodged prior to the draft of this plan in respect of this land off Great Lane. Much is made of the importance of ridge and furrow in the draft plan, but that seemed to count for little in this application. Furthermore, the significant issues raised in the 100 plus public objections filed online seemed to of been ignored by the parish council in not raising a single objection at the deferred application hearing. Again due to work commitments we could not attend said planning meeting to make representations and hoped (maybe naively) the parish council given its objections at the initial hearing would continue with the objections at the following stage. Therefore we are both extremely sceptical as to what value comments made by</p>		<p>The Parish Council acted in accordance to support the Neighbourhood Plan and the parish's chosen site selections</p>	<p><b>No change</b></p>	
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		parishioners in respect of this draft may have.				
23.	Page 70, Monitoring and Review	Should this be a policy	Melton Borough Council	Not to be accepted as a policy as how would it determine a planning application? It is a statement of intent that has been used previously in Made NPs	<b>No change</b>	<b>Statutory Consultee</b>
24.	General Comment	A glossary and list of abbreviations at the end of the document would be useful and might aid those without strong planning knowledge.	Melton Borough Council	Noted	<b>No Change</b>	<b>Statutory Consultee</b>
25.		I would like to congratulate all involved at NPAC in producing a professional, detailed, balanced and well thought out document. I'm very impressed with the amount of detail, care and thought that has gone into this piece of work. I completely support everything within this document	Alex Warwick	Noted and thank you for your support	<b>No Change</b>	<b>Resident</b>
26.		The draft neighbourhood plan is a comprehensive, well presented document and the team should be congratulated for their efforts. The plan highlights amenities to be preserved however we should consider what additional amenities would be required for the increase in population or for improvement of current amenities. Developers budget to spend a percentage of contract value on social/environmental investment and I believe we may not be accessing and optimising this social	Stephen East	Noted and thank you for your support  Noted the plan is seeking to provide a play area for children and monetary support to current facilities for improvements. The plan can really only identify what shortfalls there are at the moment rather than predict what might come. The PC will seek to optimise any funding that is available	<b>No Change</b>	<b>Resident</b>

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		investment in the village by the developers.				
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No.	Plan section/ policy number	Comments	From	Response	Proposed amendment	Status
27.		<p><b><u>Draft Frisby Neighbourhood Plan Representations on behalf of Mrs. S. Noble.</u></b></p> <p>This report should be considered as a representation into the emerging draft Neighbourhood Plan for Frisby on the Wreake. The representation is on behalf of Siobhan Noble, who along with her family owns land to the west of Water Lane.</p> <p>This site is currently the subject of a planning application for 30 dwellings that is being considered by Melton Borough Planning Committee. It is understood that there are no technical impediments to this proposal and that it is to be reported to the Committee in March.</p> <p><b>Basis of Comments</b></p> <p>These comments do not follow completely the format of the suggested questionnaire. This is because in order to understand the Plan it is necessary to first review the strategic context as well as critical</p>	Landmark Planning			Developer on behalf of a resident landowner

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>elements of the evidence base behind the Plan, particularly in relation to the site selection proposals incorporated. This is especially in relation to the housing sites, as it is only the evidence base that tries to set out why individual sites are chosen.</p> <p><b>Strategic Context</b></p> <p>The Town and Country Planning Act 1990 Schedule 4B s116 para 8(2) describes the basic conditions that a Neighbourhood Plan needs to satisfy. The first of these is that the Plan should have <i>“regard to national policies and advice contained in guidance issued by the Secretary of State.”</i> The Secretary of State in the National Planning Policy Framework (NPPF) sets out in para. 16 that:</p> <p><i>“Critically, it will mean that neighbourhoods should:</i></p> <ul style="list-style-type: none"> <li>● <i>develop plans that support the strategic development needs set out in Local Plans, including policies for housing and economic development;”</i></li> </ul> <p>Further para 184 of the NPPF explains that:</p> <p><i>“Neighbourhood plans must be in general conformity with the strategic policies of the Local Plan.” and that:</i></p>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p><i>“Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.”</i></p> <p>The Plan does not satisfy this basic condition in that it is incompatible both the strategic content and the quantum of development proposed in the emerging Melton Local Plan (MLP).</p> <p>The emerging Local Plan promotes three sites for development while the Neighbourhood Plan only promotes two one of which is only a reserve site in the Local Plan.</p> <p>The reserve site in the MLP has been promoted to one of the two essential sites in the Neighbourhood Plan (NP). The reason this site for 24 units is a reserve in the MLP is that Melton Borough Council (MBC) have been told by the owner that this site (in a publicly available recent representation) is not deliverable without the allocation of a much</p>		<p>The neighbourhood plan provides 78 houses as required in the MBC Local Plan and therefore satisfies the requirement for housing numbers. The lack of conformity with the strategic content is not described.</p> <p>Promoting fewer sites than the LP is not an issue of non-compliance. MBC advises that the LP contains sites that MAY be used to supply the required new housing. However, a site may be listed in the LP yet not used if the allocated number is met.</p> <p>FRIS4 was offered as a site option in good faith by FPC for inclusion in the Neighbourhood Plan. Following the comments received from MBC and the landowner during the regulation 14 consultation FRIS4 was formally withdrawn from the process on March 21<sup>st</sup> 2017 and has subsequently been removed as a deliverable site option from FOTW NP.</p>	<p><b>No change</b></p> <p><b>No change</b></p> <p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>larger site. The larger site would be at least double in size to the proposed allocation and well outside the limits of Frisby on the Wreake. This would be incompatible with the MLP.</p> <p>In addition, the quantum of development of 78 in the NP is achieved by increasing the number of houses on the site off Great Lane to 54, despite a planning application being recently granted for only 48. And this was only after the Planning Committee of the Borough Council had previously expressed concerns that the number of 48 proposed was too great for this site. This must cast serious doubt about whether the extra 6 units can be achieved.</p> <p>Therefore, the Plan does not satisfy the basic conditions for a NP and cannot be found sound.</p> <p>Having failed the basic condition test, it is not really necessary to proceed further to review the emerging draft NP. However, in order to be helpful to the drafters for future work to make the Plan sound I have made more</p>		<p>Comments received from Richborough Estates during the regulation 14 consultation states that 54 houses can be accommodated on the site. MBC has not registered an objection to the development potential for this site.</p> <p>This is not accepted as demonstrated by MBC comment of conformity to the draft MBC local plan.</p> <p>The suggestion that the NP fails to meet the basic conditions is not accepted.</p>	<p><b>No change</b></p> <p><b>No change</b></p> <p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		detailed comments in relation to specific statements outlined in the NP. They also illustrate in greater depth the concerns about the sites chosen and by implication the sites not chosen, despite being allocated in the MLP.				
28.	Para 5, p.13 b) Environment “To protect and enhance our natural, built and historic environment, we are seeking to ensure that: ☐ The most special open spaces within our village are protected from development, to protect the village identity and retain the rural nature of its surroundings”	This refers to protection of open space <u>within</u> the village – yet sites 16, 17, 18 and designated as LGS or recommended for special protection are <u>outside</u> the village and part of the adjoining countryside. Whilst several important sites <u>within</u> the village, such as sites 60,64 and 44 have not been designated with such protection	Rebecca Hayward	The sites were chosen as a consequence of a detailed assessment of sites across the parish. Proximity to the built-up area was just one of a number of criteria considered. – LGS, ‘other sites of environmental significance’ and R&F (policies ENV1, ENV2 and ENV5) can be anywhere, but Important Open Spaces (policy CAENV1) <u>should</u> be within (or on the immediate periphery of) the built-up area. The cricket field, site 44, is not within the village. It does score highly (23/32) in the Inventory but does not reach the required minimum score of 24 and therefore does not qualify to be designated LGS. Sites 60 and 64 are very small, green areas within the village. They are designated Important Open Space, but do not achieve the score required for LGS status (14 and 16 respectively).	<b>NP change P13 para 5 change village to “parish”</b>	<b>*Non-Resident Landowner</b>
29.		<b>RE: Frisby Neighbourhood Plan 2017 -</b>	Melton Borough	Noted. We have taken the policies of	<b>No change</b>	<b>Statutory</b>

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p><b>Pre-submission Consultation</b></p> <p>Thank you for sending the pre-submission Frisby on the Wreake Neighbourhood Plan 2016 to Melton Borough Council for comment.</p> <p>Melton Borough Council fully supports the community's initiative to produce a Neighbourhood Plan and recognises that this is a community-led process. The advice contained within this letter is intended to assist the Steering Group in ensuring a submission version Neighbourhood Plan is developed that will withstand examination and any possible legal challenge.</p> <p>Melton Borough Council's response is based on the pre-submission consultation documents provided via email to the Council on the 6th February, 2017. This response is structured with regard to the basic conditions as set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 (as applied to Neighbourhood plans by Section 38A of the Planning and Compulsory Purchase Act 2004).</p> <p>A. Whether the Plan has regard to National Planning Policy and advice;</p>	Council	the emerging Local Plan into account when considering the NP, whilst ensuring they are in general conformity with the Adopted Local Plan (1999).		<b>Consultee</b>
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>B. Whether the Plan contributes to Sustainable Development:</p> <p>C. Whether the Plan is in general conformity with the Council’s own development plan;</p> <p>D. Whether the Plan complies with various European Obligations.</p> <p>Please could I refer you to two important areas of national guidance that describe the needs to which the points in this correspondence relate. ‘Basic Condition A states that “Neighbourhood plans should have regard to national policies and advice contained in guidance issued by the Secretary of State it is appropriate to make the order (or neighbourhood plan)” (NPPG).</p> <p>The NPPG goes on to explain that to meet this condition, Neighbourhood Plans must have due regard for Paragraph 16 of the NPPF, which sets out that Neighbourhood Plans should support the “strategic development needs” set out in the Local Plan. Moreover, the NPPG clearly directs Neighbourhood Plan Groups to Paragraph 184 of the National Planning Policy Framework which states:</p>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>“Neighbourhood plans should reflect these policies (as contained in a Local Plan) and neighbourhoods should plan positively to support them. Neighbourhood plans and orders should not promote less development than set out in the Local Plan or undermine its strategic policies.” (NPPF Para 184)</p> <p>Whilst we appreciate the Local Plan is not adopted, the contents of the Pre-Submission Plan have been made available to the Parish Council in advance of this Statutory Consultation.</p> <p>Notwithstanding concerns to be raised below, it is recognised and appreciated that this Neighbourhood Plan makes full allocations for housing required by the Melton Local Plan Pre-Submission Draft (78 dwellings), however it is worth remembering that the plan may change dependent on responses received during Pre-Submission Consultation, this decision will be made on the 9th March. Moreover, during the eventual examination of the plan, the Inspector may require we make changes to plan,</p>		<p>The NP will reflect the most up to date housing numbers available and if necessary will be reviewed should numbers increase beyond the level indicated in the draft LP once the LP has been adopted.</p>	<p><b>No Change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>which could also have an influence on housing numbers and distribution.</p> <p>To ease your understanding of our comments and its relation with your Draft we have structured this letter to follow your draft. Moreover, we have not commented wherein we are content that the plan is sound and meets the criteria above. It must be remembered that as a part of the Development Plan and a legal planning document, the policies proposed must be appropriate for the determination of planning applications, either in granting or refusing.</p>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

### Housing and Built Environment

No	Plan section/ policy number	Comments	From	Response	Proposed amendment	Status
30	Pages 15/16	No mention of school access of Gaddesby lane between the site and A607	John Greaves	Noted	No change	Resident
31	Page 21 policy H5	Nothing about acceptable noise levels anywhere in document	John Greaves	Noted update to NP  Policies H5 and H7 both address issues concerning noise.	<b>Addition to Page 21 “any new development must be designed to include measures to mitigate excessive noise for existing and new residents”</b>	Resident
32		There was a mention of reserve sites, one being a further development towards Kirby Bellars, is this a further extension to the Great Lane proposal? If so, what would be the total number of houses built?	Julian Jones	There is no mention of a reserve site or a further development site in the NP towards Kirby Bellars	No change	Resident
33	Policy H2 Housing Allocations & Fig 4 pages 17/18	To someone not familiar with the village it would be more helpful if a site plan for each housing allocation FRIS1 & FRIS2 were to be shown rather than or as well as a Limits to Development plan, which if you were unaware of the limits to development it would not be	Environment Agency	Noted update to NP	<b>Plan updated to ensure chosen sites are labelled on the LTD map (figure 4)</b>	Statutory Consultee

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		easy to spot the new site locations.				
34	Page 20, 6 <sup>TH</sup> bullet point down	Can I suggest the addition “all areas of floodplain as shown on the Environment Agency Flood Zone maps”	Environment Agency	Noted update to NP	<b>NP updated at 6th bullet point p20 amended to “Landscaping of all areas of floodplain as shown on the Environment Agency Flood Zone maps; also of any new SuDS and other possible flood/surface water mitigation measures. Planting should be native flora suited to such areas.”</b>	<b>Statutory Consultee</b>
35	Policy H7 Windfall Sites page 24	Can I suggest a point i) It is not within an area of high flood risk	Environment Agency	Noted update to NP	<b>NP updated with an additional point i) It is not within an area of high flood risk</b>	<b>Statutory Consultee</b>
36		Letter from SG Wood owner of FRIS 4 appears in LGS regulation 14 response document.	SG Wood	Response in LGS reg 14 response document		<b>Resident Landowner</b>

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37	Page 17 all text	Should not this all be highlighted as being part of policy H2?	Ash Howe	Noted and agreed, NP updated	<b>Update NP to highlight all new text as necessary.</b>	<b>Resident</b>
38	Page 19, para 8	“wanted of mixture” to read “wanted a mixture	Ash Howe	Noted and agreed, NP updated	<b>NP updated P 19 para 8. Replace ‘of’ to ‘a’</b>	<b>Resident</b>
39	Page 22, para 3	Remove altogether as duplicated	Ash Howe	Noted and agreed, NP updated. Statement also appears on p21	<b>NP updated on p 22 para 3 Delete sentence starting “Preference was also...”</b>	<b>Resident</b>
40	Page 14 Para 6, Housing	Accurately, there are 247 houses in the village. It would be best to have current figures rather than from a 2011 Census	Simon Blake	Noted. Whilst the electoral roll figures are more recent than the census we are advised by Your Locale that it remains the best way to identify trends based upon comparative data.	<b>No change</b>	<b>Resident Stakeholder</b>
41	Page 22 Figs 5 & 6	Both figs have blurred writing on them. This is out of focus/unreadable.	Simon Blake	Noted unable to amend as data supplied by ONS data	<b>No change</b>	<b>Resident Stakeholder</b>
42	Page 23	No title to the table below	Simon Blake	Noted plan updated	<b>NP table on P23 updated with legend “Housing mix”</b>	<b>Resident Stakeholder</b>
43	H1 Housing Provision	At all the village consultation meetings, I have attended it has been evident that the villagers believe that 78 new houses (which will increase the size of the village by one third– 33%) is the maximum number that Frisby	Brian Howes	Noted and appreciated this is not within our control. The NP cannot express the housing requirement as a	<b>No change</b>	<b>Resident</b>

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		can accommodate whilst still protecting the village identity which has been intact for over 1000 years. The first sentence of H1 is the overriding policy for future development. If successful planning applications mean that H2, the preferred Housing Allocation does not happen, then so be it. The overriding policy must be to keep development at no more than 78 houses. If the plan can somehow incorporate the above regardless of application outcomes it should do so.		maximum		
44	<b>Housing and Built Environment Pages 14-18</b>	<p>My comments:</p> <p>At this Point I want it made clear that whenever I mention the FPC <b>I wish that</b> Councillor Charles Sercombe FPC committee member to be excluded.</p> <p><b><u>The Housing &amp; Built Environment has been developed around the LTD survey which clearly shows extreme concerns of biased, underhanded &amp; unlawful behaviour. I have based this response on factual events and information.</u></b></p> <p>This whole Section needs to be removed, <b>IT IS TOTALLY FLAWED AND UNLAWFULL as due process has not been conducted throughout.</b> The survey was developed to <u>lead</u> our village parish towards an outcome that suited many of the NPAC &amp; FPC members. This will be explained in more detail below. Since the LTD survey in October the Great Lane outline planning application for <b>48 dwellings</b> has been passed at MBC committee on the</p>	Pete Rogers	Your comments have been noted. FPC and NPAC have written the neighbourhood plan in line with the MBC local plan thus ensuring conformity. The PC and NPAC have engaged in a transparent and unbiased exercise, welcoming and encouraging community involvement. It is regrettable that Mr Rogers has not found it satisfactory. The process of engaging the community has been very thorough, as described in detail in the consultation statement. Not accepted.	<b>No Change</b>	<b>Resident</b>
					<b>No Change</b>	

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>12<sup>th</sup> January 2017. This after an initial deferral for housing density levels on the first MBC committee hearing on the 10<sup>th</sup> November 2016. This application has been <b>supported</b> by the FPC with very little or no challenge from the FPC and NPAC as this obviously suited their agenda to accommodate some of the total number of 78 houses in our village. They obviously did not have the fight or inclination to challenge Richborough Estates on this matter. This action has taken place without any thought to the residents between house numbers 19-33 of Great lane who had a very good case to reduce the housing density numbers more in-keeping with the area location.</p> <p>The Rotherby Lane site is and has always been <b>undeliverable</b> in its present form as will be explained later below.</p> <p><b><u>Background</u></b></p> <p>We were told by Rachael Armstrong (MLP Manager) and James Beverley back on the 11<sup>th</sup> March 2016 that the only way FRISBY could have a say in where house allocations would go was to conduct a one off village survey to identify the collective views of our community. Even then they did say that it would carry little weight.</p> <p>This survey was carried out and sent to the MBC at the end of May 2016.</p>		<p>The parish chose their favoured sites through consultation and FPC dutifully supported the NP.</p> <p>The initial survey was for 48 houses only and the community was not fully informed at that stage of the</p>	<p><b>No Change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>Results: (90% return) (There was also a vast amount of parish information collected on the views of our community)</p> <p><b>Results: collective site location</b></p> <ul style="list-style-type: none"> <li>• 33% wanted Mr D Cook Great lane / Rotherby Lane MBC/007/16</li> <li>• 28% wanted a Combination of sites</li> <li>• 24% wanted Mr Machine Great Lane MBC/191/15</li> <li>• 15% wanted Mrs Desmond-Noble Water Lane MBC/004/16</li> </ul> <p><b>Results on a Single Site location</b></p> <ul style="list-style-type: none"> <li>• 48% wanted Mr D Cook Great lane / Rotherby Lane MBC/007/16</li> <li>• 31% wanted Mr Machine Great Lane MBC/191/15</li> <li>• 21% wanted Mrs Desmond-Noble Water Lane MBC/004/16</li> </ul> <p>At the same time FPC through their independent consult organisation “Yourlocal” engaged in a site sustainability study. This was conducted without the knowledge of the NPAC.</p> <p>This study was carried out by <b>Derek Doran</b>.</p> <p>After a FEW challenges by some NPAC members due to the inconsistency across the different land studies, various <b>changes were made</b>. Results shown below.</p> <p>A meeting took place between the FPC and NPAC to</p>		<p>intricacies for each site such as access, flooding, drainage etc. The survey and its results became null and void when MBC increased the village settlement number to 78 houses in August 2016.</p> <p>This document was rejected by the Parish on June 7<sup>th</sup> 2016.</p>	<p><b>NP updated with improved supporting</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>consider submission to the MBC. It was agreed that this study should NOT be forwarded as it contained too many inconsistencies and was very subjective.</p> <p><b><u>Mr D Cook Great lane / Rotherby Lane MBC/007/16</u></b>  RAG rating  Red – 7, Amber – 13, Green - 6</p> <p><b><u>Mr Machine Great Lane MBC/191/15</u></b>  RAG rating  Red – 10, Amber – 10, Green – 6</p> <p><b><u>Mrs Desmond-Noble Water Lane MBC/004/16</u></b>  RAG rating  Red – 6, Amber – 6, Green - 14</p> <p>From that time forward the agenda the NPAC &amp; FPC community have been struggling to address are:</p> <ul style="list-style-type: none"> <li>• Point 1 - What is the least number of houses we can get away with</li> <li>• Point 2 - Where these houses should be located through a fair process.</li> </ul> <p>At NO point have the Frisby Parish Council addressed the real issue of:  <b>What is best in terms of improvements to OUR village and the community</b></p> <p>There were 3 Land owners who offered their land through the SHLAA process.</p> <ul style="list-style-type: none"> <li>• Mr Machine Great Lane MBC/191/15</li> <li>• Mrs Desmond-Noble Water Lane MBC/004/16</li> </ul>			evidence	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<ul style="list-style-type: none"> <li>Mr D Cook Great lane / Rotherby Lane MBC/007/16</li> </ul> <p>The policy of the FPC was NOT to formally engage with the land owners to discuss and identify clear planning gains to OUR village. The land owners are people who have been part of this community for many years they have ALWAYS welcomed dialogue to try and work through to a mutually agreed outcome.</p> <p>The FPC &amp; NPAC were re-engaged on the introduction of a new Chair to the NPAC in the Autumn. The agenda was to “Fast” track a Neighbourhood Plan, so that the community could carry more weight in future planning proposals.</p> <p>The settlement figures for Frisby have increased and currently sit at 78 houses, however this does not conform to the Pre submission MLP of 94 Houses.</p> <p><b>This is ONE of the basic conditions that a Neighbourhood Plan is required to meet in order to proceed to referendum.</b></p> <p>Basic Condition “A”) States that Neighbourhood plans should have regard to national policies and advice contained in guidance by the Secretary of State it is appropriate to make the order (or neighbourhood plan) (NPPG)</p> <p>The NPPG goes on to explain that to meet this condition then Neighbourhood plans must have due regard for Paragraph 16 of the NPPF, which sets out that Neighbourhood plans should support the “strategic</p>		<p>FPC met all landowners or their chosen representatives. They walked around each site and were made fully aware of community benefits offered within the applications. Each applicant held an open event within the village to inform parishioners of their proposals</p> <p>The NP proposes 78 houses as required through the draft Local Plan and fully conforms to the basic condition statement</p>	<p><b>No Change</b></p> <p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>development needs” set out in the Local Plan. Moreover the NPPG clearly directs Neighbourhood plan groups to Paragraph 184 of the National Planning Policy Framework which states:  “Neighbourhood Plans should reflect these policies (as contained in the Local Plan) and neighbourhoods should plan positively to support them. <b>Neighbourhood plans should not promote less development than set out in the Melton Local Plan or undermine its strategic policies “(NPPF Paragraph 184)</b></p> <p>The FPC / NPAC approach to the delivery of the houses has differed profoundly from that set out in the Melton Local Plan. These differences are extremely important as the “ <b>Frisby neighbourhood plan” is undeliverable and thus falls foul to the Basic Condition A.</b></p> <p>It is also very important to note that the NPAC &amp; FPC through the outcome results of their October village survey (see survey section below) have reduced the allocations from Fris 2 Water lane site and Fris 3 Land to South to zero contribution. This has been done by using Fris 1 Great Lane and “The reserve site” Fris 4. <b>The Melton Local Plan allocates Fris 2 “&amp; Fris 3, with Fris 4 being a reserve site. There has been NO site allocated as a reserve site which is in direct conflict to the MLP.</b></p> <p>There is and has always been an issue of deliverability of the Fris 4 Rotherby lane site.  This site has been submitted as 1 site by Mr Woods the</p>		<p>NPs are able to identify sites for the delivery of houses (PPG para 044), so the difference in approach is not in itself incompatible with the Basic Conditions. The sites identified in the NP were identified as deliverable and developable until the end of the Regulation 14 consultation.</p>	<p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>land owner. MBC split the site under their SHLAA process to sites “A” and “B” or sites 4 and 6. MBC have stated that site 4 is more preferable to site 6, <b>but less preferable than Fris 2 and Fris 3. The Frisby neighbourhood plan</b> seems to agree that site 6 is less preferable, earmarking the land as Local Green Space, in an area and outside the LTD boundary.</p> <p>Mr Woods who was never approached by the NPAC before the village LTD survey in October 2016 has stated that without the two sites Fris 4 (A &amp; B or 4 &amp; 6) being one then the site is undeliverable as far as he is concerned.</p> <p>This now leaves a significant shortfall in the land supply needs for our village.</p> <p>Therefore a re-engagement with the <b>community</b> to identify deliverable sites and a reserve site would require further additional work or by leaving it to the MBC planning process to identify the sites. (As in the emerging MLP)</p> <p>This would NOT go down well with the community and be EXTREMELY embarrassing to the NPAC &amp; FPC. It would seem that through their current actions the NPAC &amp; FPC are trying to cover their tracks in the development of this NP document and in doing so miss representing and miss leading the community.</p> <p><b><u>Choice of sites in the Frisby Neighbourhood Plan</u></b></p>		<p>FRIS 4 was withdrawn from the NP: please see comment below</p> <p>Parish consultation for new site choices undertaken April 21<sup>st</sup>-28<sup>th</sup> 2017</p>	<p><b>Plan updated with new LTDs and site choices following April 21st-28<sup>th</sup> 2017 consultation</b></p> <p><b>Plan updated with new LTDs and site choices following April 21st-28<sup>th</sup> 2017 consultation</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>The Chair of the FPC has stated in correspondence that we should only settle for 78 houses.          In September the NPAC decided to “Put a stake in the ground” regarding a new village envelope and in doing so identify where these 78 houses should go within the village. <b>(This is when the FPC &amp; NPAC made fundamental errors both in their individual and collective actions regarding the choice where the village wanted these houses developed). <u>It has NEVER been about the village it has been about WHAT the NPAC and FPC WANTED and influenced.</u></b></p> <p><b><u>The Chain of events from September 23<sup>rd</sup> 2016</u></b></p> <p>On the 23<sup>rd</sup> September the NPAC Chair and some of their members met with consultants “yourlocal”. <b>An action from that meeting was for Derek Dorans to take the emerging draft NP away to view and offer recommendation for improvement. (See NPAC minutes 23<sup>rd</sup> October)</b></p> <p>On the 24<sup>th</sup> September the Chair of the NPAC stated that they would draw up the various combinations of survey options. <b>(Stating “this was not rocket science”).</b>          On the 3<sup>rd</sup> of October as promised Derek Dorans returned his draft comments to the NPAC Chair.</p> <p><b><u>Derek Doran’s draft response comments as agreed at the 23<sup>rd</sup> September Meeting.</u></b></p>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p><u>Sent to the NPAC 3<sup>rd</sup> October 2017</u></p> <p>“Best of luck with the consultations. <b>The strategy is to agree these two sites as the only allocations for the next 20 years</b> – protecting the bulk of the Parish land and the best environmental assets, character and feel of Frisby”.</p> <p>“I would stress that only a small proportion of the Parish is being allowed to grow with new residential allocations, <u>two specific sites</u> in the existing built up area. <u>As we discussed at our recent meeting</u>, the remainder of the Parish does not require any further development to ensure the protection of its historical natural character”.</p> <p>“In terms of the description, <u>I would advise that you ONLY set out the preferred option (5 ??)</u>”.</p> <p>“Consultation, <u>clearly agree the target allocation of 78 dwellings over the term of the plan</u>”</p> <p>“Also stress, that the neighbourhood plan has primacy over the local plan in terms of localised land use planning allocations <u>as it is proposing certainty due to the proven support of the local community and the fact that the allocations are deliverable</u>”.</p> <p><b><u>Derek Doran’s comments on the Housing Allocations</u></b></p>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>“This whole section needs to be totally rewritten following the public consultation and stressing the <u>positive community agreement to the target of 78 dwellings</u>. Meeting this target will give the NP a lot of weight with a Planning Inspector”.</p> <p>“I would include Mike Ayres survey – <u>importantly, ensure this will be suggesting option 5 as the favoured allocation solution ??</u>”.</p> <p>My response to this correspondence from Derek Doran’s is:</p> <p><u>I would like the NPAC &amp; FPC to explain to the village WHY it would seem that Mr Dorans new that there would only be:</u></p> <p><u>Two sites and that Option 5 would be the LTD October survey outcome BEFORE the survey went out on the 5<sup>th</sup> October 2016.</u></p> <p><u>Note: There was 5 Options (1...5) with 3 Options having a 2 site combination and only 2 Options with a housing total of 78 Houses</u></p> <p><u>LTD Survey 4<sup>th</sup> October 2016</u></p> <p>The NPAC Chair presented the LTD survey options. It was pointed out by myself that the options grossly</p>		<p>Mr Doran, as an expert in his field, is entitled to express his professional opinion on his view of options and outcomes</p> <p>The LTD survey October 4<sup>th</sup> 2016 is now deemed null</p>	<p><b>No change</b></p> <p><b>NP update with new LTDs</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>favoured the Great lane site that was proposed in 4 out of the 5 options (80%). The Water lane site proposed in 3 out of the 5 options (60%). The Land to South(HO) was only proposed in 2 out of the 5 options (40%). I also pointed out that the figures shown in options 1&amp;2 were grossly miss representative of the Land owners pending planning application. On the 5<sup>th</sup> October I offered another survey that represented all site options fairly and accurately in terms of housing numbers. <u>However this was dismissed by the NPAC and FPC unanimously.</u></p> <p><b>With such an important survey it was imperative to base it on up to date factual information and NOT miss lead the community to ensure a fair and true end result.</b></p> <p>So with this in mind WHY:</p> <ul style="list-style-type: none"> <li>• Were the Options biased 80% Great Lane – 60% Water lane – 40% Land to South (HO)</li> <li>• Is the (Undeliverable) reserve site Rotherby Lane only showing 24 Houses, when its SHLAA has 66 House. <b>(I know we did NOT even bother to ask the Land owner Mr Woods).</b></li> <li>• Was the (Undeliverable) Rotherby lane reserve site in 3 Options.</li> <li>• Was there NO reserve site.</li> <li>• Was there NO Water Lane &amp; Land to South Option</li> <li>• Was the Reserve site offered in Option 1</li> <li>• Did the Water lane site NOT show its SHLAA and</li> </ul>		<p>and void due to the withdrawal of FRIS 4 by the landowner.</p>	<p><b>following parish consultation April 21<sup>st</sup>-28<sup>th</sup> 2017</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>Application site boundary and chose to show the MLP boundary.</p> <ul style="list-style-type: none"> <li>• Did the Great lane site not show the SHLAA numbers and also not show where the figure of 61 houses come from.</li> <li>• Was it appropriate to show the Land to South (HO) “Field not included”</li> <li>• Do the various option figures NOT add up correctly.</li> <li>• Why did the Land to South (HO) have both Application submission and SHLAA figures. (Especially when the SHLAA process figures had been clearly explained to the NPAC &amp; FPC in April 2016 and on various occasions afterwards)</li> <li>• Did we <b>TOTALLY confuse</b> the community with a covering letter that MOST people probably did not understand or even read.</li> <li>• If the agenda was to pick an option that accommodated 78 Houses did we offer options with numbers well above this.</li> </ul> <p>• <b><u>Note: There was 5 Options (1...5) with 3 Options having a 2 site combination and only 2 Options with a housing total of 78 Houses</u></b></p> <p><b><u>Further Information for consideration.</u></b></p> <p>Two of the NPAC committee members are neighbours to the sites and are fierce objectors to the Water lane and Land to the South applications. They were very</p>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>much instrumental in the agreement of the LTD survey options that went out to the parish and both rejected my alternative options presented to the NPAC on the 5<sup>th</sup> October as an fairer alternative out right.</p> <p><b><u>Method of distribution of the October 4<sup>th</sup> LTD Survey</u></b>          Distribution team- The method of delivery was to allow distributors who live in their own site location to deliver to their neighbours) (<b><u>Opportunity to influence the outcome by lobbying for support</u></b>)          The NPAC / FPC are made up of people who have been put in a position of influence to stay unbiased. However that has not been the case as these people are human and made up of residents who are after their own personal gain. <u>There is absolutely NO way with such a major criteria like the housing allocation LTD that they would be able to separate their own personal interests and serve to deliver a fair and unbiased process.</u></p> <table border="1" data-bbox="472 927 1155 1190"> <tr> <td colspan="4">October 4<sup>th</sup> LTD Village Survey</td> </tr> <tr> <td>Option 1</td> <td>3 Sites</td> <td>102-375 Houses</td> <td>Water Lane / I</td> </tr> <tr> <td>Option 2</td> <td>2 sites</td> <td>88-311 Houses</td> <td>Great Lane / L</td> </tr> <tr> <td>Option 3</td> <td>3 Sites</td> <td>102-115 Houses</td> <td>Great Lane / V</td> </tr> <tr> <td>Option 4</td> <td>2 Sites</td> <td>78-101 Houses</td> <td>Great Lane / V</td> </tr> <tr> <td><b>Option 5</b></td> <td><b>2 sites</b></td> <td><b>72-85 Houses</b></td> <td><b>Great Lane / F</b></td> </tr> </table> <p>The agenda of this survey was to ensure <b>ONLY 78 HOUSES:</b>          That is WHY:</p>	October 4 <sup>th</sup> LTD Village Survey				Option 1	3 Sites	102-375 Houses	Water Lane / I	Option 2	2 sites	88-311 Houses	Great Lane / L	Option 3	3 Sites	102-115 Houses	Great Lane / V	Option 4	2 Sites	78-101 Houses	Great Lane / V	<b>Option 5</b>	<b>2 sites</b>	<b>72-85 Houses</b>	<b>Great Lane / F</b>		<p>Not accepted. The PC and NPAC have engaged in a transparent and unbiased exercise.</p>	<p><b>No change</b></p>	
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		<p>Only <b>78 houses</b> mentioned in accompanying letter and on the survey 1<sup>st</sup> &amp; last page.</p> <p>So the message to the community was made very <b>CLEAR.</b></p> <p>Due process is the requirement that established laws and standards of behavior must be followed during any official act on the part of the village in terms of “Polling” and gaining their views and opinions and to ensure that individual's rights are not infringed upon. <b>I have proven beyond any reasonable doubt through both facts and the NPAC/FPC actions that the whole process is FLAWED.</b></p> <p>Let us now consider the:  <b>FRISBY ON THE WREAKE NEIGHBOURHOOD PLAN</b>  <b>Site Selection Methodology Sustainability Surveys</b></p> <p>The NP submission November survey has questions 11, 19, 21 included. Also question 30 has been included in the RAG assessment. For comparison I have removed them.</p> <p><b><u>May &amp; November Study outcomes</u></b></p> <table border="1" data-bbox="465 1177 1144 1289"> <thead> <tr> <th></th> <th>Great Lane</th> <th>Water lane</th> </tr> </thead> <tbody> <tr> <td>May 2016</td> <td><b>60</b></td> <td><b>88</b></td> </tr> <tr> <td>November 2016</td> <td><b>89</b></td> <td><b>79</b></td> </tr> </tbody> </table>		Great Lane	Water lane	May 2016	<b>60</b>	<b>88</b>	November 2016	<b>89</b>	<b>79</b>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>The May study carried out by Derek Doran of “Yourlocal” and was agreed that the study should NOT be forwarded as it contained too many inconsistencies and was very subjective. The second by the NPAC who again are not qualified to provide a NON biased accurate study result. The November study contains the Rotherby site where the study results have been elevated with NO detailed information to measure the study criteria. When you look at the method of these two studies, then once again it is a <b>totally flawed process</b> and subjective to the NPAC required outcome.</p> <p><b><u>In Summary</u></b></p> <p>MBC have advised that the evidence base used to underpin the MLP can and likely will be used in examination of a Neighbourhood Plan, including evidence such as site assessment and deliverability. It is clear that the village have been led by the NPAC and FPC who have their OWN self-interests as the main agenda. There are <b>far too many</b> very concerning points that have been raised in this document that clearly demonstrate the evidence base is <b>NOT CREDITABLE, EXTREMELY BIASED and conducted without “Due process”</b> so therefore only contributes to a <b>“FLAWED”</b> Frisby on the Wreake Neighbourhood Plan.</p> <p><b>Note: There are other various events and decisions that have occurred throughout this process that can and will substantiate the evidence submitted if</b></p>		<p>NPAC consulted with numerous experts and stakeholders whose expertise was used as the foundation of the document, more information has become available since they were undertaken.</p> <p>There have been changing circumstances throughout the development of the NP resulting from the increasing housing numbers required by MBC through further planning approvals to sites being added and withdrawn. FPC would have been subject to criticism if we had kept with the original assessments in the face of this shifting situation.</p>	<p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>required at a later date.</p> <p><b><u>General Comments</u></b></p> <p>The actions by both the NPAC and FPC demonstrates a real LACK of ability to deliver a fair due process with regard to the Housing allocation element with their Neighbourhood plan. Clear under handed behaviour has been conducted to deliver own personal gain. The Housing and Built Environment section is totally flawed in process and end results. I will be taking my extensive portfolio of facts and evidence all the way post regulation 14. I have been advised that I need to give you the opportunity to respond before I take my next steps.</p> <p>At the FPC meeting on the 31<sup>st</sup> January Councillor Ford and Baxter denied knowing that at the FPC meeting held on the 15<sup>th</sup> November 2016 that they agreed with the decision that the NPAC increase the housing allocation figures from 48 to 54.</p> <p>Councillor Ford went on to say “Why would we when we were trying to reduce the density numbers”, this being one of the reasons Great lane planning application had been deferred on the 10<sup>th</sup> November 2016. The Chair of FPC said to me in October 2016 “that he thought that the NPAC and FPC would be totally partisan by now”. Well it does not look like under his leadership that this has been resolved.</p>		<p>Noted not accepted</p>	<p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>Councillor Ford also stated at this meeting “that we still do not know if Mr Woods Rotherby lane site was DELIVERABLE”.</p> <p><u>This statement being made some 4 months after the village LTD survey incorporated it as a deliverable option.</u></p> <p>I look forward to my feedback on all the points I have raised.</p> <p><b>Note: I am very happy for my comments to be open to the Frisby on the Wreake community to view. In fact I welcome this.</b></p> <p>I also hope that the NPAC &amp; FPC Councillors review their position in light of this TOTAL fiasco on Housing Allocations. I feel it is shameful that people who have either volunteered or been voted into office can conduct themselves <u>in what seems</u> a biased, underhanded and or unlawful way. (House allocation was always going to be contentious, so therefore based on the NPAC &amp; FPC performance on this matter or LACK of it, then they should have left it to the MBC planning system as stated back in March 2016)</p>		<p>FRIS4 was offered as a site option in good faith by FPC for inclusion in the Neighbourhood Plan. Following the comments received from MBC and the landowner during the regulation 14 consultation FRIS4 was formally withdrawn from the process on March 21<sup>st</sup> 2017 and has subsequently been removed as a deliverable site option from FOTW NP.</p>	<p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

45		We have read the draft plan with interest but are curious as to how the "Limits to Development" around the village have been determined. We would appreciate a brief explanation in due course, but, at the same time, we apologise for adding to your time burdon we may be placing on you. Perhaps you could provide a response at your convenience, which will be appreciated. Thank you.	A & P Hesketh	Noted and thank you. An explanatory note has been added into the NP	<b>Updated the NP to confirm the neighbourhood plan LTDs took into account the results of the parish surveys, extant/granted planning applications and were drawn around the former parish boundary from 2005 as the base.</b>	<b>Resident</b>
46	Page 7, with reference to Policy H6 Housing Mix	It is such a valid point that the village development should be mindful and therefore works towards the required village profile of housing needs – it has been clearly stated in questionnaires and consultations that there is a need for both starter homes for the young and bungalows / suitable housing for the elderly. These must be designated within the housing developments to ensure the community is gaining sustainable community housing.	S Heaney	Noted these are exactly the points that need to be made when detailed planning applications are submitted	<b>No change</b>	<b>Resident</b>
47	<b>Page 15 FRIS1 Land at the top of Great Lane / P16 Policy H2</b>	Melton Borough Council for a number of reasons has granted planning approval after considerable concern. One of these was the amount and density of the development. Indeed, the application was deferred to consider a reduction in the numbers. Now the Plan,	Landmark Planning	Comments received from Richborough Estates during Reg 14 consultation state that 54 houses can be accommodated on the	<b>No Change</b>	<b>Developer on behalf of a resident landowner</b>



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		published within a month of the resolution to approve, says it “might” be possible to increase the numbers by 6. This is only a “might,” but the Plan relies on this number without any testing. Without this testing, the Plan cannot meet its minimum target, so it will be unsound if this cannot be resolved.		existing permitted area. Please see the site plan submitted for Great Lane phase 1 and 2 from Richborough Estates as part of their Regulation 14 comment on page P67 of this document.		
48	<b>Page 16 FRIS4 Land off Rotherby Lane P17 Policy H2.</b>	<p>The description says this site is brownfield. This is not the case, as it is a working farm. The glossary to the NPPF specifically excludes such land, as being defined as previously developed land or brownfield land. Indeed, as a working farm what is to happen to the farm if all its buildings are removed?</p> <p>Replacement accommodation would be necessary. Not only would a site need to be found, but also critically the financial resources for what would be a very expensive exercise. Given that elsewhere in the Plan there is a requirement for 37% affordable housing; would sufficient resources be available to achieve this? Questions such as this need to be answered, before any confidence can be given to the proposed allocation.</p> <p>There also do not appear to be any proposals for the development of this site to test its feasibility or indeed a commitment of the owners to pursue a proposal. Without a proper evaluation of any proposal for the number proposed and a commitment from the owners the housing numbers, which are critical to the Plan, FRIS 4 cannot be achieved. The Plan cannot be sound at present.</p>	Landmark Planning	<p>Noted FRIS 4 is removed from the NP</p> <p>FRIS4 was offered as a site option in good faith by FPC for inclusion in the Neighbourhood Plan. Following the comments received from MBC and the landowner during the regulation 14 consultation</p>	<p><b>NP changed with new site selection as per consultation of April 21<sup>st</sup>-28<sup>th</sup> 2017</b></p> <p><b>No change</b></p>	<b>Developer on behalf of a resident landowner</b>

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>The Plan proposes 24 houses, but there is little explanation in the Plan, other than it is within easy walking distance of facilities. The Plan does point out that the site contains a listed building, no assessment, however, has been undertaken to consider how the setting of this asset can be safeguarded, if substantial development around it is to provided. (see also Page 7 below Starred (*) in relation to the statutory duty of a decision maker). This is a particular concern as the building is currently at risk and in need of substantial renovation.</p> <p>Furthermore, <b>P54 Policy ENV 3 Important Woodland Trees and Hedges</b> with <b>Fig 21 on P53</b> identifies sites that are expected to be protected when development proposals are considered. This includes substantial rows of trees adjacent or within the site <b>FRIS 4</b>. No consideration of this issue appears to have been undertaken.</p> <p>There is therefore a raft of concerns about this proposal if the Plan is to be found sound.</p>		<p>FRIS4 was formally withdrawn from the process on March 21<sup>st</sup> 2017 and has subsequently been removed as a deliverable site option from FOTW NP.</p>		
				<p>The identified trees in FRIS4 will be added to Policy ENV 3 as suggested</p>	<p><b>NP updated TPO suggestions added to the tree survey</b></p>	
49	<b>P17 Limits to Development (LTD) Policy H3P18</b>	<p>It is noted that this is currently only illustrative. These proposals need to be firmed up more before effective consultation can take place. However, the LTD seems to rely on the existing allocations above, which have some considerable uncertainty, to meet the target of 78 dwellings outlined in Policy H1. The limits can only be properly cast once much greater certainty is known about the allocations in the Plan.</p>	Landmark Planning	Noted	<p><b>NP update of LTDS Will be undertaken prior to submission to MBC once the housing sites have been determined.</b></p>	<p><b>Developer on behalf of a resident landowner</b></p>
50	<b>P18</b>	<p>Criteria c) refers to the RAG system, which forms the</p>	Landmark	No e mail received please	<b>No change</b>	<b>Developer</b>

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<b>Methodology</b>	<p>basis of the site selection criteria. This is only outlined in <b>Appendix F</b>, so this is discussed here.</p> <p>The basis of this analysis was, it is understood, first based on an independent assessment by the Frisby Neighbourhood Plan Committee advisers Your Locale. Indeed in e-mail dated 3<sup>rd</sup> October 2016 from them this is again advocated.</p> <p>However, this evaluation is not available and the assessment has been significantly altered by the Committee to produce different preferred sites. Moreover the altered judgements are not based on known facts that are available in the public domain.</p>	Planning	<p>provide</p> <p>The Your Locale’s document was not used following the meeting on June 7<sup>th</sup> and recorded in the PC meeting minutes dated June 21<sup>st</sup> 2016</p>		<b>on behalf of a resident landowner</b>
51	Policy H1: Housing Provision	<p>2.1 Richborough Estates welcomes the draft NP’s recognition of the need for additional housing growth in Frisby on the Wreake and the work that has been undertaken to seek to identify the most appropriate and sustainable way to accommodate future development through the plan.</p> <p>2.2 Policy H1 identifies a target of 78 new dwellings in Frisby over the period 2017 and 2036. Richborough Estates recognises that this target figure is informed by the emerging Melton Local Plan (Pre-Submission Draft) and that Policy H1 is therefore in line with paragraph 184 of the National Planning Policy Framework (the NPPF) which requires neighbourhood plans to be in general conformity with the strategic policies of the Local Plan.</p> <p>2.3 However, given the significance of establishing an appropriate housing target, it is considered important to re-iterate here that Richborough Estates have serious</p>	Richborough Estates	<p>Noted FOTW wishes to remain a small rural parish. The infrastructure does not support the suggestion of an upgrade change of status</p> <p>These issues are for MBC to address not Frisby PC. Many NPs have come forward in advance of emerging Local</p>	<b>No change</b>	<b>Developer on behalf of a resident landowner</b>

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>concerns with the soundness of the housing target currently being proposed in the emerging Melton Local Plan. In particular, Richborough are concerned that the approach to identifying the settlement roles and hierarchy in the emerging Local Plan is flawed and does not adequately reflect the sustainability of the settlements in the district. As set out in detail in our representations to the Pre-Submission Local Plan in December 2016, Richborough Estates contend that the identification of Frisby on the Wreake as a ‘Rural Hub’ is not justified when considering the range of services and amenities within the village. It is submitted that by the Council’s own methodology, the emerging Melton Local Plan will need to be modified to identify Frisby on the Wreake as the higher level ‘Service Centre’ in order to ensure the development strategy and settlement hierarchy within the Local Plan is justified and effective and can be found sound.</p> <p>2.4 We do not repeat our concerns about the housing target for Frisby in detail here, as we appreciate that is a matter to be dealt with by the Melton Local Plan, and not the Frisby Neighbourhood Plan. However, we feel it important to highlight that the housing requirement figure for neither Melton nor Frisby has yet been tested through the rigours of a Local Plan examination and with regard to the concerns briefly highlighted above, Richborough Estates anticipate the target for Frisby will need to be increased from that currently proposed in Policy H1 in order to ensure development in the district is directed to the most sustainable locations.</p>		<p>Plans and can only be based on the latest information available. It is recognised that housing numbers may increase, but conversely, they may also decrease. If the NP requires a review in the future to accommodate increased levels of housing this will be undertaken. However the MBC local plan is subject to some delays as outlined on their website on March 22<sup>nd</sup> 2017.</p>		
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>2.5 We understand the Melton Local Plan is due to be submitted to the Secretary of State for examination in April/ May 2017. It will be essential to the future relevance and effectiveness of the Frisby NP that it is either not progressed in its current form until the housing target has been tested through the examination process or, the proposed Policy H1 is reworded to allow greater flexibility to respond to a change in the identified housing target for the village. This could be achieved through the introduction of a 'contingency' policy and the identification of additional deliverable housing sites as 'reserve sites', to be relied upon should the overall housing figure for the village increase.</p>				
52	Policy H2: Housing Allocations	<p>3.1 Richborough Estates support the proposed allocation of land off Great Lane (FRIS 1) for new housing. With reference to footnote 11 to paragraph 49 of the NPPF, Richborough can confirm the site represents an available, suitable, achievable and deliverable housing site. The land benefits from a resolution to grant outline planning permission for residential development subject to a Section 106 agreement (ref: 16/00491/OUT). It is anticipated that the Section 106 agreement will be completed in the upcoming weeks and the formal decision notice issued by the end of March 2017.</p> <p>3.2 With reference to the supporting text to Policy H2 in the draft NP, we take the opportunity to clarify the following points:</p> <ul style="list-style-type: none"> <li>☐ The work that has been undertaken in relation to technical constraints and masterplanning for</li> </ul>	Richborough Estates	Noted	<b>No change</b>	<b>Developer on behalf of a resident landowner</b>

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>the site has demonstrated that the site could accommodate at least 54 dwellings in a manner appropriate to the context and constraints of the site surrounding area;</p> <ul style="list-style-type: none"> <li>☐ The comment on page 16 of the draft NP about surface water run off is noted and we can confirm the application was support by a Flood Risk Assessment. This identified that the site is within Flood Zone 1 (areas least likely to flood). Drainage proposals were also put forward to show how surface water run off will be limited to green field rates by means of flow attenuation. These proposals were assessed and considered acceptable by the Lead Local Flood Authority during the determination of the application;</li> <li>☐ To encourage pedestrian movement between the site and the centre of the village, the application scheme includes for the provision of a new footway along Great Lane connecting the proposed access to the site to the existing footway to the north;</li> <li>☐ It has also been demonstrated through the application that a safe and appropriate access to the site can be achieved via Great Lane, and that the impact of the development on the local highway network would be acceptable.</li> </ul> <p>3.3 On a more general note, it would be helpful to include a plan showing the proposed allocations within the Neighbourhood Plan itself to aid clarity. We are</p>		<p>Noted the LTD map will include the correct outline in the final NP.</p>	<p><b>NP update of LTDS will be included as per</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>mindful of the need to ensure the proposed Limits to Development in Policy H3 encompass all of the land subject to permission 16/00491/OUT (which was slightly larger than the proposed site originally included in the emerging Local Plan).</p> <p>3.4 Overall, the Neighbourhood Plan Advisory Committee and the wider community of Frisby can have a great deal of confidence that land off Great Lane (FRIS 1) represents a suitable and deliverable housing allocation that benefits from a commercially viable planning permission and will come forward to meet the needs in the village. A suite of detailed, technical information has been submitted with the application to demonstrate the achievability of residential development on the site and no objections or concerns have been raised by statutory consultees.</p> <p>3.5 In contrast, there appears limited evidence that land at Rotherby Lane (FRIS 4), the other proposed housing allocation in Policy H2, is deliverable, especially when the requirements imposed by Policy H2 are taken into account. The majority of FRIS 4 is currently occupied by agricultural buildings and in describing the site, the draft NP refers to it being ‘the only working farm that remains in the village’. This raises questions around the availability of the site for residential development. Whilst the site has been promoted through the Melton Strategic Housing Land Availability Assessment, we are not aware that there are any developers on board or that there is any firm intention or timescales to vacate the site to allow for its future redevelopment.</p>		<p>FRIS4 was offered as a site option in good faith by FPC for inclusion in the Neighbourhood Plan. Following the comments received from MBC and the landowner during the regulation 14 consultation FRIS4 was formally withdrawn from the process on March 21<sup>st</sup> 2017 and has subsequently been removed as a deliverable site option from FOTW NP.</p>	<p><b>the April 21<sup>st</sup>-28<sup>th</sup> parish consultation which determined the housing sites.</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>3.6 Richborough Estates also question what evidence there is that the development as envisaged in the criteria in Policy H2 is commercially viable. The policy requires any development on FRIS 4 to deliver 37% affordable housing and facilitate the restoration of the adjacent Grade II listed building, Zion House. Richborough would question the viability of these requirements from a development of only 24 dwellings, especially when the cost of demolishing the existing buildings on site along with any associated ground remediation would also need to be factored in.</p> <p>3.7 In the context of these doubts around the deliverability of FRIS 4, Richborough wish to take the opportunity to re-iterate representations they made previously to the emerging Melton Local Plan promoting an additional area of land to the immediate east of FRIS 1. This land is also available, suitable, achievable and deliverable for further residential development. The proposed wider allocation is shown on the plan enclosed in Appendix 1. It includes an additional 1.6 hectares of land to the immediate east of the land that currently benefits from planning permission 16/00491/OUT and could represent a ‘Phase 2’ to that development. The site can be considered deliverable with regard to the following tests in footnote 11 of the Framework:          Availability – The area of land to the east of FRIS 1 in the draft NP is within the same ownership as FRIS 1 (the Machin Family). Richborough Estates have an</p>		<p>Your comments have been noted.          This offer of additional land has been included in the parish consultation on April 21<sup>st</sup> 2017</p>	<p><b>NP updated with new LTDs</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

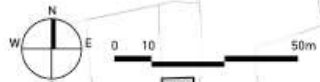
		<p>agreement with the land owners who support the promotion of the whole site for residential development. As such, there are no legal or ownership constraints to developing the site and it can be confirmed as available.</p> <p>Suitability – The suitability of FRIS 1 for housing has been robustly demonstrated through the granting of planning permission on the site. Richborough Estates have also commissioned technical surveys and assessments of the identified additional land to the east of FRIS 1. This work has also confirmed there are no technical or physical constraints which would prevent the wider site coming forward for residential development.</p> <p>Achievability – An assessment of the technical constraints and necessary mitigation measures that would be required to deliver both FRIS 1 and the land to the east have confirmed there is nothing that would physically, environmentally, socially or legally constrain the development of the wider site.</p> <p>3.8 The enclosed Illustrative Masterplan (Appendix 1) shows how the area of additional land could accommodate a further 25 to 30 dwellings, meaning the entire site would be able to deliver the whole of the currently identified housing requirement for Frisby on the Wreake (78 dwellings).</p> <p>3.9 There are several material advantages to delivering the entire housing requirement on land at Great Lane:</p> <ul style="list-style-type: none"> <li>- The deliverability of FRIS 1 has been demonstrated beyond any doubt through the</li> </ul>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>application process so the local community can have confidence the site will come forward for development;</p> <ul style="list-style-type: none"> <li>- The allocation of the wider site to meet the whole housing target will reduce the risks that the draft NP will fail to deliver the housing requirement to be established within the emerging Local Plan. It would therefore help ensure that the NP can be used as a robust basis to defend Frisby against speculative applications on land outside of the defined settlement boundary;</li> <li>- Allocating the additional land to the east of FRIS 1, where new development is already set to come forward, would direct the remaining housing requirement for Frisby to a location that would have the least impact upon existing residents and the character of the existing settlement. This is especially pertinent when compared with FRIS 4 which lies adjacent to the historic heart of the village;</li> <li>- -Allocation of the larger site would allow for greater flexibility in design of the development. It would provide scope for more high quality landscaping and open space to be introduced; and</li> <li>- Any disturbance caused through the construction process (ie. through construction traffic or noise pollution) would be concentrated in one area of the village, thereby</li> </ul>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>minimising disruption to village residents.</p> <p>3.10 Even if the Neighbourhood Plan is progressed with the allocation of FRIS 1 and FRIS 4 as currently proposed in Policy H2, there should be a mechanism introduced into the plan to allow for some contingency should FRIS 4 not come forward as envisaged, given the deliverability concerns that exist. This is essential to ensure the NP has the flexibility to respond to changes in circumstance. Given that land to the east of FRIS 1 would represent an extension to FRIS 1, which has already been confirmed as a suitable and achievable development site, it presents an eminently logical 'reserve site' for inclusion in the draft NP should the decision be taken not to allocate the whole of the site.</p>				
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# Richborough Illustrative Masterplan (Appendix 1)

**KEY**

	PHASE 1 SITE LOCATION		PROPOSED RESIDENTIAL DEVELOPMENT		PUBLIC OPEN SPACE
	PHASE 2 & LAND WITHIN APPLICANTS CONTROL		EXISTING LANDSCAPE		SUSTAINABLE URBAN DRAINAGE

PHASES 1 & 2 QUANTUM: UP TO MAXIMUM OF 79 DWELLINGS



**KEY PRINCIPLES**

1. PRINCIPAL STREET AND ACCESS VIA GREAT LANE; RESIDENTIAL BUILDING LINE EXTENDING EXISTING STREETScape.
2. SOFT DEVELOPMENT EDGE.
3. FOCAL POINT BUILDINGS AND KEY SPACE.
4. BUNGALOWS.
5. 1.5 STORY COTTAGES.
6. EXTENDED BUILDING SEPARATION DISTANCES; PROPOSED PUMPING STATION.
7. GREEN EDGE.
8. EXISTING FIELD EDGE.
9. VIEW TO ST. PETERS CHURCH IN KIRBY BELLARS.
10. SHARED SURFACE STREET AND PROPOSED ELECTRICITY SUB-STATION.
11. EXISTING PONDS RETAINED.
12. POTENTIAL NEW PLAY SPACE.

**PHASE ONE**  
48 TO 54 DWELLINGS.  
DEPENDENT ON HOUSING MIX.

**PHASE TWO**  
25 TO 30 DWELLINGS.  
DEPENDENT ON HOUSING MIX.

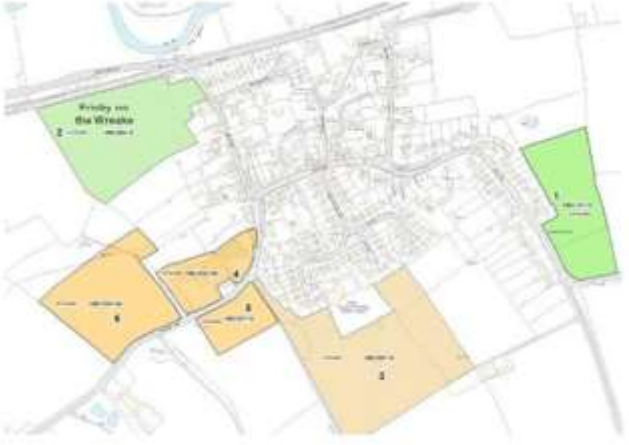
LAND OFF GREAT LANE, FRISBY ON THE WREAKE - PROPOSED INDICATIVE MASTERPLAN (PHASES 1 & 2)



## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

53	FRIS 1 & Page 15	The land off Great Lane is defined in this text as arable. It is not and is clearly permanent pasture/grazing. Having inspected the field during the recent archaeological excavations it is clear that the water table is extremely high (within 50cm of the surface) and aforementioned excavations have severed several clay pipe land drains. This has resulted in the field becoming seriously water logged and water already washing off the surface and eroding top soil.	Shaun Groom	Noted Flood Risk Assessments and drainage proposals will be undertaken prior to development	<b>No change</b>	<b>Resident</b>
54	Page 14, Last Para	Reference is made to the reserve site being used to make up a shortfall in the Borough, this is incorrect. Reserve sites are a mechanism to ensure delivery in any given settlement. For this site to come forward, the applicants would have to provide evidence as to why the settlements other sites would not deliver	Melton Borough Council	Noted NP update	<b>Sentence is removed due to withdrawal of FRIS4</b>	<b>Statutory Consultee</b>
55	Page 15, FRIS1	The Borough Council notes that the allocation made is different from that granted planning permission in 2017. It was explained to the Council that discussions by the agent had taken place and the additional housing within the allocation could be made. It is understood that an agreement has been reached with the agent, and that a further 6 dwellings are deliverable, though this will most likely have to form a new planning application, as the outline is up to 48 homes (16/00491/OUT). It would be beneficial for a masterplan to be provided to show how the additional six dwellings could be included on the site and not on additional land within the applicants control as per the policy. It is worth remembering that the site density was already a concern for members of the planning committee and	Melton Borough Council	Noted. Please see the site plan submitted for Great Lane phase 1 and 2 from Richborough Estates as part of their Regulation 14 comment on page P67 of this document. This demonstrates how the homes could be accommodated on the 2 phases of the site. We would draw your attention to Appx F and the report submitted by Richborough Estates.	<b>NP updated with new LTD and housing allocation accordingly</b>	<b>Statutory Consultee</b>

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		local residents, some of which felt the density of the approved scheme was already too high.				
	Page 17, FRIS4	<p>During the Pre-submission Consultation the following was brought to our attention from the owner of this site. Fris4 was originally part of a larger submission made up of land 4 and 6 on the below map.</p>  <p>The Council made the decision to split the site and assess them as two different sites, with 4 being more preferable to 6, but less preferable than 1,2 and 3. The Draft Neighbourhood Plan seems to agree that site 6 on the above map is also less preferable for residential development, earmarking the land both as Local Green Space and outside the Limits to Development. The issue with relying on just site 4 is that the owner has stated</p>	Melton Borough Council	<p>FRIS4 was offered as a site option in good faith by FPC for inclusion in the Neighbourhood Plan. Following the comments received from MBC and the landowner during the regulation 14 consultation FRIS4 was formally withdrawn from the process on March 21<sup>st</sup> 2017 and has subsequently been removed as a deliverable site option from FOTW NP. A revised site selection process will ensure that the minimum housing requirement is met through the provision of alternative sites.</p>	<b>NP updated and FRIS 4 removed from the NP and replaced with new LTDs post village consultation</b>	<b>Statutory Consultee</b>

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>that it is not deliverable without site 6. This has come fresh of the recently held Local Plan consultation. The owner of the site has stated in conversation with officers and also partially through submitted Local Plan Reps that the cost of redevelopment of Fris4, including expensive works to the Grade Two Listed Zion House and the relocation of the farm to a new working location mean that without Fris6, Fris4 cannot come forward alone. This information throws grave doubt into the deliverability of the allocation of Fris4, and thus the delivery of the plan overall. Without sufficient evidence to counter this information, Melton Borough Council would have to object to the Neighbourhood Plan as it would in our opinion fail basic condition A. Moreover, caution should be noted that by allowing the expansion of the site to allow for additional 'enabling' development to allow Fris4 to come forward, may undermine the plan for the reasons outlined above (Local Green Space designation and Limits to Development Policies) and that additional justification would now be required.</p> <p>It is noted that the Neighbourhood Plan looks to deliver the same quantum of housing as the Local Plan, but through differing means. The Pre-Submission Local Plan allocates 3 sites and a reserve to ensure the delivery of at 78 dwellings over the plan period. The Neighbourhood Plan looks to allocate the same quantum on 2 sites, with no reserve. This lack of a reserve site is particularly problematic given the</p>		<p>Noted but it is stated in the NP that the sites in the MLP are not deliverable. Frisby has no reserve site</p>	<p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>deliverability concerns raised above. It is the belief of Melton Borough Council that reserve sites are important for the delivery of the Boroughs housing requirement, and as such forms a strategic policy within the Local Plan, diversion from this may again lead to an objection to your Neighbourhood Plan. On a more general note, failure to deliver a reserve could lead to the need for early review of the plan or risk becoming out of date.</p> <p>The Neighbourhood Plan Group are reminded that to ensure safe passage through the examination process, the rationale behind site selection methodology must be as clear and robust as possible. If in light of the above comments the group are minded to select different sites, we advise as well as possible to ensure any and all evidence connected with that decision is available in a clear document/s and the reasoning behind the choice of sites is also clear. This means it should be clear to anyone who reads the document what the reasoning behind choosing or in rejecting given site is. The Authority reserve the right to communicate with the group moving beyond this consultation, to advise on how best to do this and where possible share good practice and thoughts.</p>		<p>Noted with thanks. The continued support of the Borough Council is very much appreciated.</p>		
56	Page 18, Limits to Development	The Authority has recognised the ability for Neighbourhood Plans to introduce Limits for Development policies, given the removal of village envelopes from the Local Plan. However, it must be	Melton Borough Council	Noted update to the NP	<b>Updated the NP to confirm the neighbourhood plan LTDs took</b>	<b>Statutory Consultee</b>



## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		remembered as to why Melton Borough Council has taken this course of action. Namely the negative effects of village envelopes on issues such as house prices and garden grabbing, notwithstanding compatibility with the NPPF and its aims. The Limits to Development whilst allowing room for the allocations, may not allow for 'breathing room' for the village, which could lead to urbanisation of the village centre from windfall development and place pressure on valued green spaces in the centre of the village			into account the results of the parish surveys, extant/granted planning applications and were drawn around the former village boundary from 2005 as the base.	
57	Page 21, Policy H5	Support reference to BfL12. Policy could be strengthened with stronger wording for example "Proposals will be supported where they perform well against Building for Life 12". Note can be taken of seeming government support for BFL as referenced in the recent White Paper.	Melton Borough Council	Noted NP update	<b>NP updated with "Proposals will be supported where they perform well against Building for Life 12".</b>	<b>Statutory Consultee</b>
58	Page 21, Policy H5	The rationale or evidence for this policy is not clear in the text of the plan, nor clearly directed to in an appendix.	Melton Borough Council	Noted. The narrative will reference NPPF paragraphs 109 and 123 which seek to ensure that development mitigates the negative impact of noise.	<b>NP updated with reference NPPF paragraphs 109 and 123 which seek to ensure that development mitigates the negative impact of noise. Bullet point added regarding noise</b>	<b>Statutory Consultee</b>

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

					<b>in Frisby</b>	
59	Page 22, 2nd sentence	Rationale is fairly clear, but punctuation and wording could use a bit of tightening	Melton Borough Council	Noted NP updated	<b>NP grammar corrected</b>	<b>Statutory Consultee</b>
60	Page 22, Graphs	The graphs here are a little unclear, even when viewed zoomed digitally, clearer graphs would be useful	Melton Borough Council	Noted NP updated	<b>Update of clearer graphs</b>	<b>Statutory Consultee</b>
61	Page 26, Figure 7	A more clear version of this map can be made available in digital form by the Borough Council should it be required	Melton Borough Council	Noted and thank you for the new map	<b>New map inserted into the NP</b>	<b>Statutory Consultee</b>
62		<p>As detailed below, our principle objection relates to the approach, evidence, site assessment and public consultation which the Frisby on the Wreake Neighbourhood Plan Advisory Committee (NPAC) has undertaken in preparing the emerging Neighbourhood Plan.</p> <p>In preparing these representations, consideration has been had to the guidance set out in the National Planning Practice Guidance in respect of the preparation of Neighbourhood Plans.</p> <p>Positive and Proactive Approach</p> <p>The guidance seeks a proactive and positive approach with the Local Planning Authority, sharing evidence and seeking to resolve any issues to ensure that the draft Neighbourhood Plan has the greatest chance of success at independent examination. The guidance goes on to state that it is important to minimise any conflicts in the Neighbourhood Plan and those in the emerging Local Plan, including housing supply policies (Paragraph 009,</p>	Fisher German for Mr and Mrs D Cook			<b>Developer on behalf of a non-resident landowner</b>

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>Reference ID 41-009-20160211, Revision date 11.02.2016).</p> <p>The NPAC has sought to engage with the LPA in preparing Frisby Neighbourhood Plan, but has only had regard to the advice provided insofar as its own position is benefited. The Officers at Melton Borough Council have on a number of occasions provided the NPAC with guidance and feedback on the emerging Frisby on the Wreake Neighbourhood Plan, most recently providing written feedback on the draft Plan ahead of its consultation. This feedback has been ignored in its entirety in progressing the Plan for consultation.</p> <p><b>Robust and Credible Evidence</b></p> <p>Further to the above, the extensive evidence base the Borough Council has prepared in formulating the emerging Local Plan has been entirely ignored in the preparation of the Neighbourhood Plan. The evidence available, as part of the Local Plan, provides a robust assessment of all the possible development sites around Frisby; drawing conclusions on those which should be allocated following a robust assessment of sites.</p> <p>The evidence prepared by the Borough Council in the preparation of the emerging Local Plan and the proposed site allocations identified having regard to this extensive body of evidence is in contrast to the four evidence documents the NPAC has prepared which include a Traffic Survey, Environmental Inventory, Tree Survey and Wildlife Survey. This evidence cannot be considered 'robust' evidence. The</p> <p>Page 2 of 7 Traffic Survey has been undertaken by</p>		<p>Not correct as numerous amendments have been made prior to consultation and much of the MBC information has been used</p>	<p><b>No change</b></p>	
			<p>The survey was conducted at the same times daily by simply counting cars</p>	<p><b>No change</b></p>	

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>various residents, utilising different forms of data capture; the Tree Survey is a record of trees within the village, it does not seek to categorise trees according to their quality as you would expect</p> <p>Tree Survey to; similarly, the Wildlife Survey is a record collated from siting's of wildlife provided by villagers, it is not a full ecological survey. Assessment of Options</p> <p>The appraisal of options and assessment of sites is a key part of any Neighbourhood Plan preparation where the Neighbourhood Plan seeks to allocate sites for development. The National Planning Practice Guidance is clear in this regard that an appraisal of options and an assessment of individual sites against a clearly identified criteria is required (Paragraph 042, Reference ID 41-042-20140306, Revision date 06.03.2014).</p> <p>An appraisal of options, based on the evidence being prepared to support the Borough Council's emerging Local Plan, was undertaken by the NPAC's appointed and qualified consultant team, Your Locale; this assessment was published in June 2016. At the time this document was prepared, the Borough Council and the NPAC were considering land to deliver 48 dwellings in Frisby in total. The sites considered included:</p>		<p>The tree survey was undertaken by the former parish tree warden and is a community driven activity. TPOs have been identified. The wildlife survey was collated by the community sightings.</p>	<p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<ul style="list-style-type: none"> <li>• ‘Great Lane Extension Site’</li> <li>• ‘Cooks Expansion Site – rear of School’</li> <li>• ‘Water Lane Extension Site’</li> </ul> <p>A site assessment framework (Final Sustainability – Housing Land Site Assessment Framework) was prepared to inform the site assessment. As set out above, a qualified, independent consultant team, ‘Your Locale’, was appointed to undertake an assessment of each site against the framework. The sites were scored as follows:</p> <p>Site</p> <p>Red Scores, Amber Scores, Green Scores</p> <p>Rank and Status</p> <p>Cooks Expansion Site 7, 13, 6 Second AMBER</p> <p>Water Lane Extension Site 6, 6, 14 First GREEN</p> <p>Great Lane Extension Site 10,10,6 Third RED</p> <p>Table 1: Summary Table - Site Scoring as detailed within the Your Locale, June 2016 Report</p> <p>The assessment concluded, “The Your Locale independent sustainability analysis of the three competing development sites in the Parish has concluded that only two of the sites are sustainable, Cook's Development's [rear of school], and Water Lane and these merits further consideration. Great Lane was considered to be least sustainable of the three options”. In reporting the findings, the Your Locale report advised that “A further community consultation exercise is now</p>		<p>The original site assessments from Your Locale were rejected by the FPC on June 7<sup>th</sup> 2016 &amp; it is the revised assessments that are in the draft NP. Amendments to the SSA used Your Locale documents as the basis, with updated MBC SHLAA information, planning application information Inc. statutory consultee responses. Not all of this information was available at the time of the Your Locale SSA. The current site assessments used in the NP are more up to date.</p>	<p><b>NP update with revised site allocation information to include new site choice.</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>required to enable the community to be brought up to date with the content of the Sustainability and Opinion Survey” with “the advantages and disadvantages of the sites [Water Lane and Cooks Expansion] explained to them to allow them to consider the full situation and agree which site to proceed with”. This exercise would no doubt have been updated to allow for the increase in dwelling numbers that the Borough Council and the NPAC has since had to plan for.</p> <p>The independent assessment of the sites, undertaken by Your Locale, are reported by the NPAC (Appendix I: Consultation and Open Events, Neighbourhood Plan) to have been rejected by the public at the Parish Council meeting on 7th June 2016. The reason for the rejection being that the assessments were “not being objective, accurate or sufficiently professional to be submitted to MBC as evidence”.</p> <p>Page 3 of 7</p> <p>This is notwithstanding that the assessments had been undertaken by a team of qualified consultants with extensive experience of working on other Neighbourhood Plans with successful outcomes.</p> <p>It is interesting to note that there are no further reports (Appendix I: Community Consultation and Open Events, of the Neighbourhood Plan) of Your Locale’s involvement in the preparation of the Neighbourhood Plan following the Parish Council meeting on 7th June 2016.</p> <p>As with the Council’s evidence base, discussed above, it is clear that the NPAC has deliberately chosen to ignore</p>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>the professional advice of Your Locale.</p> <p>This is evidenced through the NPAC subsequently undertaking its own assessment of sites as set out in Appendix F: Site Selection Methodology of the Neighbourhood Plan. This assessment is presumably considered by the NPAC to be a more ‘objective, accurate and professional’ assessment of the sites than that undertaken by Your Locale; albeit there is no date provided as to when the assessment was undertaken, nor who the author of the assessment was. Furthermore, and as detailed above, there is no new credible evidence available to the NPAC on which to base the revised scoring and justify revised site scoring from that undertaken by Your Locale.</p> <p>The table below illustrates the differences in scoring of that undertaken by Your Local in May 2016, and that undertaken by NPAC.</p> <p>Site</p> <p>Increase in Positive Scoring since Your Locale Assessment</p> <p>Increase in Negative Scores since Your Locale Assessment</p> <p>Cooks Expansion Site 4, 4</p> <p>Water Lane Extension Site 0,6</p> <p>Great Lane Extension Site 12,1</p> <p>Table 2: Summary of increased Positive and Negative Scores in Site Assessment since the Your Locale</p>		<p>Not accepted as Your Locale &amp; MBC have been involved with the NP and continue to be. Amendments to the site selection matrix were made utilising more up to date information from statutory stakeholders, which was not available to Your Locale at the time of their doing the assessments</p>	<p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>Assessment</p> <p>The increase in the positive scores associated with the Great Lane site, may have resulted following a review of the planning application documents which were available in the public domain at the time the re-assessment was undertaken. However, if this is the case, substantially increased positive scoring would be expected for the Cooks expansion, south of the school, as a planning application and its supporting information was also available for review.</p> <p>Separate to the above, but worth noting, there are some errors in adding within the NPAC's tables contained in Appendix F of the Neighbourhood Plan.</p> <p>In respect of my client's land, Cooks Expansion – rear of school, it is worth noting the differences in scoring between Your Locale and the NPAC assessment, as illustrated in the table below.</p> <p>Site Assessment Criteria</p> <p>Score Change</p> <p>Comment</p> <p>Topography</p> <p>Amber to Red</p> <p>The topography of the site has remained exactly the same since the Your Locale Assessment was undertaken- the revised scoring cannot be justified.</p> <p>Safe Access to Public Transport on A607</p> <p>Amber to Red</p> <p>As confirmed through the Great Lane planning application and the Highway Authority response to the</p>		<p>It is red in the Your Locale scoring</p> <p>Survey completed prior to acceptance of GT Lane application. Bus stop on A607 demolished by a car.</p>	<p><b>No change</b></p> <p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>Cook, land to the south of the school, application, there Page 4 of 7 are no highways objections in respect of safe access to the A607.</p> <p>Flood Issues Amber to Red</p> <p>Flood issues have not changed since the Your Locale Assessment was undertaken- the revised scoring cannot be justified. Further work has been undertaken and submitted in with the planning application which confirms the sites suitability for development in this respect.</p> <p>Drainage Issues Amber to Red</p> <p>Drainage Issues have not changed since the Your Locale Assessment was undertaken- the revised scoring cannot be justified. Further work has been undertaken and submitted in with the planning application which confirms the sites suitability for development in this respect.</p> <p>Table 3: Summary of key differences in scoring between Your Locale and NPAC Assessment</p> <p>It is also worth commenting on the scoring of the additional site, land at Rotherby Lane [Zion House] which receives 17 'Green' scores in the NPAC's assessment of the site (6 'Green Scores ahead of the second highest scoring site). Again the credibility of the scoring is questioned. The site has scored 'Green' against the criteria "Any contamination issues"; the site is an operational farmyard and therefore cannot without a contamination assessment score so well</p>		<p>Not tested on the Land to the South application yet</p> <p>For both flood and drainage issues scoring has been applied based upon LLFA letters 5.12.16 &amp; 9.3.17 stating "<i>The application documents as submitted are insufficient for the Lead Local Flood Authority to provide an acceptance at this stage</i>"</p> <p>As above</p> <p>This site has been withdrawn by the landowner</p>	<p><b>No change</b></p> <p><b>No change</b></p> <p><b>NP updated with the new LTD's following village consultation</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>against this criterion without the appropriate evidence. This is just one example, of many.</p> <p>As set out above, the NPAC has no new credible evidence on which to make the amendments to the site scoring from that undertaken by Your Locale. It is therefore unclear as to why the scoring has been revised. The 2016 assessment of sites was undertaken by a team of qualified consultants, with extensive experience of helping communities prepare Neighbourhood Plans (Your Locale). In contrast, the 2017 assessment lacks any transparency as to the assessment and the revised scoring, is considered to be fundamentally flawed, and should not, and cannot, be relied on to progress the Neighbourhood Plan.</p> <p>In considering whether to progress the Neighbourhood Plan to Examination, the NPAC should have regard to the recent Examiners report in respect of the Weedon Bec Neighbourhood Plan, which in response to the assessment of housing sites concluded that “whilst the sites have been appraised, there is a lack of apparent transparency in the selection of sites”. The Examiner went on to state “too many of the Plan’s policies and proposals including the site allocations, lack robust and proportionate evidence to support them. It is not clear how some of the allocations and proposals have come about and as a result the process appears to lack transparency. The Plan does not include proportionate, robust evidence to support the approach taken and the choices made”. The Examiner recommended that the Plan should not proceed to referendum.</p>		<p>Unable to comment on any other neighbourhood plan. NPAC have always worked in an open, transparent and collaborative manner</p>	<p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>Page 5 of 7 Consultation In April 2016, the NPAC undertook a village survey, seeking resident's opinion on three potential development sites:</p> <ul style="list-style-type: none"> <li>• 'Cooks Expansion Site – rear of School'</li> <li>• 'Water Lane Extension Site'</li> <li>• 'Great Lane Extension Site'</li> </ul> <p>The results of this consultation found that land to the rear of the school was favoured by 48% of respondents and 33% of respondents, if the development was to include a combination of sites. The table below summarises the responses from residents; respondents were asked whether they preferred a single site location or a combination of sites. The table is taken from the 'Frisby on the Wreake Community Consultation (May 2016)', report to Melton Borough Council by Frisby Neighbourhood Plan Advisory Committee.</p> <p>Table 4: Summary of responses received to the April 2016 consultation. Note: Location 1 is 'Cooks, Land to the rear of school, Location 2 is Land off Water Lane, Location 3 is Land at Great Lane.</p> <p>Having regard to the above, it is clear that as at April 2016, when residents were first able to comment on proposed allocations, land to the rear of the school was the most preferred whether brought forward as the only site in the settlement, or in combination with another site.</p> <p>Notwithstanding the above results, the NPAC undertook a further consultation with the community in October</p>		<p>Survey null and void as housing allocation numbers for FOTW increased and changed in June to 78 houses this survey was only relevant for 48 houses.</p> <p>Applications for all sites were available in October and no one site could deliver FOTW housing allocation of 78 houses at that time, hence combination sites</p>	<p><b>No change</b></p> <p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>2016. This consultation included an additional site, land at Rotherby Lane.</p> <p>The NPAC reports the result of this consultation as the combination of the Great Lane site and “the brownfield” Zion House site [Rotherby Lane site]; preferred by 61.4% of villagers.</p> <p>The consultation undertaken in October 2016, cannot however be considered to be a fair and comparable exercise to that undertaken in April 2016. In April 2016, residents were asked to consider each site separately, as well as in combination with another site. The October 2016 consultation sought opinion on a combination of sites only.</p> <p>In addition, and far more concerning is that the consultation material sent to residents has been misleading. Residents were advised that the land to the rear of the school could deliver between 48 and 340 dwellings. This was in contrast to the reporting of the other site combinations, which reported far lower numbers.</p> <p>Page 6 of 7</p> <p>The NPAC were very well aware of the proposals for land to the south of the school and had full knowledge that the land to the east of the development area is proposed as open space, as part of the development, and would not therefore be built on in future; limiting the number of dwellings on the site to 48 dwellings not the 340 dwellings suggested.</p> <p>Furthermore, the additional site at Rotherby Lane [Zion</p>		<p>were the only options.</p> <p>Applications and MBC SHLAA documents were the basis of the October survey with planning application numbers being the minimum number quoted by site</p>	<p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>House] was described as brownfield land. Again, this is a misleading statement as agricultural land and associated farmyards, are not classified as brownfield land.</p> <p>The questions posed to residents were deliberately misleading, and arguably influenced the way in which respondents chose to respond.</p> <p>In addition, the Rotherby Lane site appeared on all five options consulted upon, with Great Lane featuring for approx. 80% of the options, Water Lane, 60% of the options and Land to the south of the school, only featuring for 40% of the options. Residents were only able to choose one option; a totally flawed consultation process.</p> <p>It is considered that the information gathered through the October 2016 consultation cannot be relied on in any way, in supporting the proposed allocations in the emerging Neighbourhood Plan. The questions put to residents by the NPAC were deliberately misleading.</p> <p>Legal</p> <p>Finally, the Neighbourhood Plan documents are held across two separate websites (Parish Council and Frisby Neighbourhood Plan), which makes it difficult to understand the evidence and work undertaken in respect of the Neighbourhood Plan. It is not clear having looked at the two websites whether the NPAC has met its legal requirements in respect of the Environmental Assessment of Plans and Programmes Regulations 2004 (SEA Regulations), and whether the Plan has been properly screened as such.</p>		<p>Not accepted as FRIS4 is only a site choice on 3 options.</p> <p>An SEA screening exercise will be undertaken by MBC prior to submission of the Examination version of the NP</p>	<p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>Conclusion</p> <p>It is considered that the Frisby Neighbourhood Plan is fundamentally flawed in its preparation. Robust and credible evidence, prepared by the Borough Council has been disregarded, as to has the advice the Borough Council has provided throughout the preparation of the Plan. The NPAC has sought to prepare evidence of its own however, the robustness and credibility of this is challenged. The assessment of sites undertaken by the NPAC, in 2017, lack transparency and any evidence on which the amended site scoring has been prepared. Most concerning of all however is that the community has been misled in the consultation exercise undertaken in October 2016; the Neighbourhood Plan cannot therefore be considered to represent the views of the community.</p> <p>I trust the above comments will be taken into consideration by the NPAC in deciding whether to progress the Neighbourhood Plan to Examination in its current format</p>		<p>Not accepted. Throughout this time, allocated housing numbers were being updated by MBC, at the same time. Multiple planning applications around the parish were submitted. The surveys had to reflect the situation at the time they were undertaken. The applications provided more information about the sites, which was continually reflected to keep residents and NPAC/PC fully informed. Regulation 14 has driven a number of necessary changes to the FOTW NP.</p>	<p><b>See amended NP</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

### Transport, amenities and economic growth

No.	Plan section/ policy number	Comments	From	Response	Proposed amendment	
63.	Page 29	There is little reference to the church and neighbourliness is grossly over exaggerated	John Greaves	Please note the church provided the narrative on P41	<b>No change</b>	<b>Resident</b>
64.	Page 30 fig 8	This is not large enough and should have been A4 and contains some minor inaccuracies	John Greaves	This is information un mapped by Severn Trent and has been provided by community members of which you are one	<b>No change</b>	<b>Resident</b>
65.	Page 31	The details of ground water and sewage are not mapped out by any authority and should include the drainage from FRIS1	John Greaves	Noted action for Severn Trent but not a requirement of the NP.	<b>No change</b>	<b>Resident</b>
66.	Page 34 and 35a	Much said about parking but practically nothing about the solutions. Flashing speed signs a waste of time. There is a simpler solution to school traffic which would be to move the school to Brooksby. This would allow for expansion in the catchment area. A deal could be done with Brooksby to allow them to build the houses. The provision of off street parking could be solved if neighbourliness was put into play.	John Greaves	Please refer to Policy TR1 School relocation is a matter for Leicestershire education authority	<b>No change</b>	<b>Resident</b>
67.	Pages 42 and 43	The photos of the chapel, village hall and bell in would have been better with both internal and external views.	John Greaves	Noted	<b>No change</b>	<b>Resident</b>

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68.	Pages 45	This was obviously written by someone very keen on up to date technology and may only be quoting a minority opinion and gives the section too much prominence.	John Greaves	Noted	No change	Resident
69.		If parking restrictions were introduced on Water Lane where would existing residents park?	Julian Jones	Noted re wording of neighbourhood plan to clarify protection of parking for residents and houses	<b>Map of potential traffic calming measures Fig 11 amended and updated to state Water Lane resident parking only.</b>	Resident
70.	Page 32	Wording re parking restrictions on Main Street and Water Lane needs clarifying it is to protect parking for existing residents. Maybe this should also be an area of residents only parking for the purpose of the plan as on Hall Orchard although in reality any actual restrictions would be difficult to implement as it only pushes the problem elsewhere. There appears to be no solution to parking problems due to the nature of the housing and road infrastructure in place. My only suggestion would be that the council and school trying to bring in a better bus service for pupils from Asfordby/Melton if the school is required to take pupils from outside catchment, which parents from these areas could contribute too should they wish their children to attend Frisby	Mrs Michelle Pond	Noted re wording of neighbourhood plan to clarify protection of parking for residents and houses	<b>Map of potential traffic calming measures Fig 11 amended and updated to state Water Lane resident parking only.</b>	Resident



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		<p>school. Whilst I appreciate that if we don't give enough business to the shop/pub/village hall we could lose them, encouraging their use also increases traffic/parking problems as none of these facilities have adequate off-street parking. It would appear to me that the neighbourhood plan, in particular the traffic and parking issues raised, just reiterates that as there are no real solutions to the issues, the village does not have the necessary infrastructure to support additional development with our roads and parking already at maximum capacity!</p>				
71.	Page 31	<p>The fact that we have a bus service at all is to be wondered at in the present climate and I do not feel that the report gives this enough emphasis. There is really only mention of it as a means of getting to work but I for one use it reasonably regularly to get to Leicester and I am sure that there a number of others who do likewise, similarly to travel to Melton. I believe there is no chance of having the main road service bus diverted through the village, especially with so many vehicles parked in the streets. This was discontinued by Midland Red many years ago.</p>	Chris Lawman	Noted and update to NP	<b>NP updated to reflect all routes available. Addition of bus timetables</b>	<b>Resident</b>

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		To state that there are traffic build ups when the level crossing is closed seems rather overstated – I don't think in nearly 40 years of using the crossing I have ever been in a queue of more than 3 vehicles.		Traffic flows have increased in recent years. During the traffic survey which you assisted with it was observed and photographed that 7 cars were seen to be queuing at the crossing exiting the village. The barriers were down for around 4.5 minutes whilst 2 freight trains passed.	<b>No change</b>	
72.	Page 32	Having helped with the traffic survey I would point out that the Hall Orchard position should be shown at the junction of HOL and Main Street opposite the Post Office and not where HOL meets Oak and Ash Way	Chris Lawman	Noted and update to NP	<b>NP updated with a clearer map and also the position of the HO junction</b>	<b>Resident</b>
73.	Page 34	-e parking on Hall Orchard Lane /Ash Way / Oak Way during School dropping off and picking up certainly needs a solution. One contributing factor is the fact that some parents in the village use their cars; whilst you cannot forbid this perhaps the school could encourage children living in the village to use walking to school as good exercise. I was astonished at the number of out of catchment children attending the school	Chris Lawman	Noted and update to NP. We will recommend that the school liaise with relevant parties to try to improve the current situation.	<b>NP updated “will include discussions with the school governors on alleviating traffic and parking issues in Hall Orchard Estate”</b>	<b>Resident</b>

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		which obviously shows how popular it is – there may be some merit in encouraging parents to car share – I see little evidence of this at the moment. Perhaps with the advent of the new housing in catchment children will increase which will reduce to some extent the number coming from further afield and hence a drop in the number of cars, albeit this will only happen in the long term. What I do not think is viable is making the estate resident parking only.				
74.	Page 40, para 6	We definitely need to actively promote the presence of the Leicestershire Round passing through the village. In the summer months, this could definitely be used to bolster income in both the café in the village shop and the pub, and attract visitors to the village who could well return when not walking.	Ash Howe	Noted: we appreciate the support for our comments. The PC would be delighted to accept any help residents are able to give to take this forward	<b>No change</b>	<b>Resident</b>
75.	Page 30 1 <sup>st</sup> para	Attention could be drawn here to the Litter Picks which occur several times per year	Simon Blake	Noted and update to NP in section 5	<b>NP updated to include “residents undertake litter picks which occur several times per year”</b>	<b>Resident</b>
76.	Page 40 Line 5	This is confusing. This arises out of the fact that 2 phrases using the clause “instead of” are used.	Simon Blake	Noted and update to NP	<b>NP updated and corrected</b>	<b>Resident</b>
77.	Page 41 Line 6	Please delete “afternoon teas” from the	Simon Blake	Noted and update to NP	<b>NP updated to remove “afternoon</b>	<b>Resident</b>

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		sentence			teas”	
78.	Page 41 Line 9	Please add “Christmas service” to “Harvest Festival and Leaving Services” in the same sentence	Simon Blake	Noted and update to NP	<b>NP updated to include “Christmas services, harvest festival and leaving services”</b>	<b>Resident</b>
79.	Page 41 Line 16	Please delete “South Transept roof”. The sentences should now read: “The church is in need of significant funds for repairs to the Baptistery and Nave rooves. There is also a great need for an effective heating system, toilets and servery.”	Simon Blake	Noted and update to NP	<b>NP updated with deletion of South transept roof and a new sentence added to read “The church is in need of significant funds for repairs to the Baptistery and Nave rooves. There is also a great need for an effective heating system, toilets and servery.”</b>	<b>Resident</b>
80.	Page No 32 Parking (fig 9)	There is also a significant parking problem at the bottom of Mill Lane between the churchyard and the Carrfields Lane junction (similar to the issue on Water Lane). This should be included in Fig 9	Brian Howes	Noted and update to NP	<b>Figure 10 amended with a red marker at the junction</b>	<b>Resident</b>
81.	Page 38 –	The correct name for the group mentioned is ‘Frisby Old School Group’ FOSG – not Friends of.....	S Heaney	Noted and update to NP	<b>Neighbourhood plan updated to “Frisby Old School Group”</b>	<b>Resident</b>
82.		Highways England welcomes the opportunity to comment on the Frisby on the Wreake Neighbourhood Plan which covers the period 2017-2036. It is noted that the document provides a vision for the future of the Parish of Frisby on the Wreake and sets out a	Highways England	Noted for 78 new houses.	<b>No change</b>	<b>Statutory Consultee</b>

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	<p>number of key objectives and planning policies which will be used to help determine planning applications.</p> <p>Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the Strategic Road Network (SRN). It is the role of Highways England to maintain the safe and efficient operation of the SRN whilst acting as a delivery partner to national economic growth. In relation to Frisby on the Wreake Neighbourhood Plan, Highways England’s principal interest is safeguarding the operation of the A46 which routes approximately 5 miles to the west of the Plan area.</p> <p>Highways England understands that a Neighbourhood Plan is required to be in conformity with relevant national and Borough-wide planning policies.</p> <p>Accordingly, the Neighbourhood Plan for Frisby on the Wreake is required to be in conformity with the emerging Melton Borough Local Plan and this is acknowledged as a requirement within the document.</p> <p>Highways England notes that the plan</p>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>makes provision for 78 new homes on two specific sites adjacent to the existing built up area in Frisby on the Wreake to meet the housing requirement of Melton Borough Council. Highways England does not consider that this scale of growth proposed within the Neighbourhood Plan will have any significant effect upon the operation of the SRN.</p> <p>Highways England has no further comments to provide, and trusts the above is useful in the progression of the Frisby on the Wreake Neighbourhood</p>				
83.	P31 Parking	<p>This has been identified as a problem in a number of locations, including Water Lane. However, limited solutions are proposed and no discussion of where at least some solution has been proposed (adjacent to the village hall) in the development proposal FRIS 2. Has this been dismissed from consideration?</p>	Landmark Planning	<p>Noted the NP makes provision for off road parking in its design policies and windfall policies and also is prioritised within the section on developer contributions.</p>	<b>No Change</b>	<b>Developer on behalf of a resident landowner</b>
84.	Page 35 Traffic calming	<p>Agree with the proposal for weight restriction on Water lane although this may be difficult to enforce in reality. What about sections for residents only parking on main street / water lane? May not be feasible just a thought (it's been used successfully in a number of small Derbyshire villages but I guess they</p>	Sarah Meadows	<p>Noted thank you for your comment</p>	<b>No change</b>	<b>Resident</b>

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		are struggling with outside visitors which is different). Sadly, public transport is not an option for commuters, and I can speak from experience having tried for 3 months to use it on first moving to Frisby				
85.	Page 43	The village hall brings additional traffic and parking issues for Water Lane – we regularly have to park on Rotherby Lane / Washstones Lane when events are on which we understand but increasing the hall’s usage does have to be balanced with residents parking needs.	Sarah Meadows	Noted Policy CF2 requires adequate parking to be provided for any additional or enhanced community facility.	<b>No change</b>	<b>Resident</b>
86.	Page 43 Pub	I don’t think it’s appropriate to say that increased housing brings increased footfall to the pub (or shop). We know through research that pubs are closing every day as modern drinking habits have changed. Hoby manages to maintain its public house without additional housing because it draws people in from further afield to dine.	Sarah Meadows	Noted the stakeholder made this comment	<b>No change</b>	<b>Resident</b>
87.	Page 44, Policy CF1+CF2.	This Policy is very similar to Melton Local Plan Policy C7. Whilst there is no objection in principle to the Policy, the need for such policies is questioned given regard for national advice regarding duplication of policies in Neighbourhood and Local Plans.	Melton Borough Council	These NP policies add detail (such as car parking requirements) to the pre-submission Local Plan Policy C7. This is legitimate in that it adds further detail and identifies the facilities in	<b>No change</b>	<b>Statutory Consultee</b>

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				question. The draft Policy C7 may change before Adoption of the Local Plan therefore the inclusion of these policies affords a degree of protection.		
88.	Page 46, Policy E1	Have the effects on viability been considered? Why has 30mbps threshold been selected? Does this policy apply to windfall sites also?	Melton Borough Council	30mbps is the recommended minimum standard as recommended by Leicestershire County Council (see their response on p138). The LCC view is that it should apply to all development.	<b>No change</b>	<b>Statutory Consultee</b>



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### Environment

No.	Plan section/ policy number	Comments	From	Response	Proposed amendment	
89.	Page 47	This was again written by someone who obviously knows their subject and is inclined to use too much jargon.	John Greaves	The NP has been written in accordance to be compliant with legal requirements, “jargon” is the vocabulary that is used by the specialists which has been mirrored	<b>No change</b>	<b>Resident</b>
90.	Page 48	Village allotments – now that provision has been made elsewhere in the village this site could be used for off street parking	John Greaves	Unsuitable safe vehicle access. The land is privately owned by Mr David Cook and Mrs Anita Cook and, whilst they are willing, the current use is favoured by those wishing to have allotment space within the village itself. The allotments remain very popular and there is a waiting list.	<b>No change</b>	<b>Resident</b>
91.	Page 51	The writing in figure 20 is impossible to read without a magnifying glass	John Greaves	Noted and improvements will be made	<b>Figure 22 Page 51 map updated with enlarged writing</b>	<b>Resident</b>
92.	Page 65	Photo looking towards Hoby	John Greaves	Noted this photograph has been removed from the NP	<b>Figure 32 photo change</b>	<b>Resident</b>
93.	Page 50 Community Action CAenv1	Can I suggest the addition “all areas of floodplain as shown on the Environment Agency Flood Zone maps	Environment Agency	Noted and update to NP	<b>NP updated to Amend list within CAENV1 to include “all areas of floodplain as</b>	<b>Statutory Consultee</b>

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	Other Important Open Space				shown on the Environment Agency Flood Zone maps” and add such areas to figure 19 Other Important Spaces	
94.	Page 51 Figure 20	Text in the key is too small to read.	Environment Agency	Noted and improvements will be made	Figure 22 Page 51 map updated with enlarged writing	Statutory Consultee
95.	Page 68 narrative on flooding	<p>The second paragraph states that “The sequential test is required in Flood Zone 2 &amp; 3 that are over 1 hectare in area”. This statement is incorrect.</p> <p>The sequential test is required for all development in Flood Zone 2 or 3 irrespective of size with the exception of changes of use and minor development as defined by NPPF – Planning Practice Guide. Changes of use to a caravan, camping or chalet site, or to a mobile home or park home site does require the sequential test.</p>	Environment Agency	Noted and NP amended to use EA definition.	<p><b>NP p68 para 2. Delete sentence starting “The sequential test is required...” and replace with “The sequential test is required for all development in Flood Zone 2 or 3 irrespective of size with the exception of changes of use and minor development as defined by NPPF – Planning Practice Guide. Changes of use to a caravan, camping or chalet site, or to a mobile home or park home site does require the sequential test.”</b></p>	Statutory Consultee
96.	Policy ENV8	Water is a precious resource and a	Environment	Noted and added to NP Policy	NP updated Policy ENV8	Statutory

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	Sustainable Development page 64	fundamental requirement and a major consideration for all new development. Water efficiency measures should be incorporated into new build housing.	Agency	ENV8	<b>Add clause “f) Water is a precious resource and a fundamental requirement and a major consideration for all new development. Water efficiency measures should be incorporated into new build housing.”</b>	<b>Consultee</b>
97.	Policy ENV 10 Rivers and Flooding Page 69	The sequential test also applies to all areas within Flood Zone 2. Additionally – Highly Vulnerable development (in accordance with Planning Policy Guidance) also requires the application of the exception test.	Environment Agency	Noted and added to NP Policy ENV10	<b>NP updated Policy ENV10 Amend to “...within Flood Zones 2 and 3...” Add statement at end of para “Additionally – Highly Vulnerable development (in accordance with Planning Policy Guidance) also requires the application of the exception test.”</b>	<b>Statutory Consultee</b>
98.	Policy Community Action CAENV 6 Flood Mitigation page 69	I would suggest changing the word “river” to “watercourse”, this will capture both flooding for rivers, streams and ditches	Environment Agency	Noted and NP amended	<b>NP updated “river changed to “watercourse””</b>	<b>Statutory Consultee</b>
		The section and map on “other sites of environmental significance” is rather ambiguous. While I see nothing	Jouni Paavola	Noted Figure 20 legend has been improved and amended. The brown areas affecting your	<b>NP update with figure 20 amendment</b>	<b>Resident Landowner</b>

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		<p>impacting us specifically in the text, the text is quite open-ended (it ought to be more definite / unambiguous in the final version which will be one of my formal comments). But the map suggests we may be affected, as one of the red areas in the map extending from water lane towards the open country side seems to be more or less coinciding with our smaller paddocks adjoining the village hall and the garden of the house next door further down the water lane. Yet they are not mentioned in the environmental appendix and there is no public access (although we have availed the paddock next to village hall for use in events whenever asked). There is no clarity what the “other sites” are, what are the implications, and the map is not of good enough quality to deem what is actually where. Would you be able to provide more information about what is intended, and how these two areas of our property closer to the village are affected by the neighbourhood plan?</p>		<p>two small paddocks indicate existing features or finds in the Historic Environment Record. The legend to the figure has been improved. Policy ENV 2 seeks to preserve or enhance locally important features within the parish but does not prohibit sensitive development.</p>		
99.	Page 49, page 61	<p>Here we should be back-to-back with (and perhaps quote) the policy of the Ramblers’ Association:</p>	Ash Howe	<p>NPAC welcomes this suggestion to strengthen residents wish to protect and enhance all footpaths within the parish and</p>	<p><b>NP updated with from <a href="http://www.ramblers.org.uk/policy/england.aspx">http://www.ramblers.org.uk/policy/england.aspx</a>) We work to help people</b></p>	<b>Resident</b>

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		<p>(from <a href="http://www.ramblers.org.uk/policy/england.aspx">http://www.ramblers.org.uk/policy/england.aspx</a>)</p> <p>We work to help people access and enjoy these benefits - which are often best enjoyed by being outdoors on foot - and to protect and enhance the beauty of the countryside.</p> <p>By this we mean the places and landscapes which are highly valued for their aesthetic qualities, which are naturally attractive and are commonly regarded to be 'beautiful'.</p> <p>We believe such landscapes need to be developed sensitively, so that the communities living in them can benefit from the services and infrastructure they require in order to have a sustainable future.</p>		<p>it has been incorporated into the NP. The PC with adopt the intent contained within the RA policies</p>	<p><b>access and enjoy these benefits - which are often best enjoyed by being outdoors on foot - and to protect and enhance the beauty of the countryside.</b></p> <p><b>By this we mean the places and landscapes which are highly valued for their aesthetic qualities, which are naturally attractive and are commonly regarded to be 'beautiful'.</b></p> <p><b>We believe such landscapes need to be developed sensitively, so that the communities living in them can benefit from the services and infrastructure they require in order to have a sustainable future.</b></p> <p><b>P61 end first para add: in accord with the policy of the RA (ref)</b></p> <p><b>Add intent to adopt RA policy into Policy Env 7 or CAENV</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

100	Page 62, CAENV4	Any work needed doing on dog access, please let me know! My spaniel and I walk the footpaths extensively, and we can acid-test for dog-friendliness!	Ash Howe	Noted and accepted with thanks	<b>No change</b>	<b>Resident</b>
101	Page 51 Fig 20	Unreadable print.	Simon Blake	Noted and fig 20 updated	<b>NP updated with the revised Fig 20</b>	<b>Resident</b>
102	Page 65 Fig 25 Area of Separation	Should the shaded blue area (AoS) not include the field directly to the east of Mill Lane? As it is outside the Limit to Development surely for completeness it should be included in the AoS	Brian Howes	The area of land referred to is believed to be LGS 16 if so it cannot be included in AoS as well. AOS is being amended in response to other consultation comments.	<b>No change</b>	<b>Resident</b>
103	Pages 50 and 78	The village allotments are <u>alongside</u> the railway not 'across' The Parish council in conjunction <u>with</u> Spelling error as states will	S Heaney	Noted and update to NP	<b>NP updated with "alongside" NP updated on P79 to be with</b>	<b>Resident</b>
104	Page 61	There is an odd grey shape within text Add AOS acronym into the title of Areas of Separation	S Heaney	Noted and update to NP	<b>NP updated</b>	<b>Resident</b>
105		Many of the diagrams/photos are of poor quality and therefore illegible pages 22,26,32,34,49,48,37,39,43	S Heaney	Noted and update to NP	<b>NP updated P22, P26, 32,34,48,</b>	<b>Resident</b>
106	Page 54	I read with interest the Tree/Hedge Survey and welcome all efforts to preserve our existing trees/hedging, protect the wildlife this supports and identify additional areas for planting	S Heaney	Noted NP update	<b>NP recommendation to TPOs are now included on P70 in appendix D and a new community action has been added.</b>	<b>Resident</b>

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		<p>new woodland areas</p> <p>Can I clarify if the NP will have a clear action and policy to ensure the all trees identified within the Tree Survey will have Tree Preservation Orders (TPOs). There is mention on Page 54 to the Parish Council and TPOs but no clear policy/action from the NP.</p> <p>We can ill afford to lose more trees, with reference to the 2 veteran ash trees felled recently.</p>				
107	P62 Env 6 Protection of Important Views (and Fig 24 P60)	<p>This policy seems to have been drawn up based upon casual observations expressed by villagers. To use it as a criterion for “strongly resisting development” requires at the very least a proper evaluation in terms of a Landscape Visual assessment. The lack of rigour can easily be seen in terms of View E, for example, where it lists the view west from residential gardens. In planning policy there can be no right to private views. And if there were such a protection none are protected east from Great Lane, which clearly have more substantial views eastwards. This policy at the very least needs review and rewording.</p>	Landmark Planning	<p>View E identifies the views from the road as well as gardens. The uninterrupted view of the skyline and sunsets is often exceptional. Many people stop as they enter the village on Water Lane for View E and the view into open countryside and Hoby church is appreciated along much of Wellfield Lane and is noted in the 1999 MLP. Great Lane offers superb views to the north from the road (view B). Views to the east are obscured by rising ground and housing.</p> <p>FOTW is located on the side of a ridge looking north and overlooks a river valley to east</p>	<p><b>NP updated. Figure 29 updated. Policy ENV 6 wording changed. ‘View E. West from road on Water Lane, and east towards village edge from Leicestershire Round footpath. The dot map from the Community Engagement event held on March 8<sup>th</sup> 2016 has been added (Fig. 30)</b></p>	<p><b>Developer on behalf of a resident landowner</b></p>

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				and west. The arrows indicate direction of views, not specific viewpoints. Views were chosen in line with the parish dot map		
108	P66 Policy ENV9: Areas of Separation	<p>4.1 Richborough Estates raise serious concerns that the proposed 'Area of Separation' under Policy ENV9 as currently drafted is not justified with regard to appropriate evidence and does not conform with the strategic policies in the emerging Melton Local Plan.</p> <p>4.2 The justification given in the draft NP for the proposed 'Area of Separation' is 'to retain the physical and visual separation between the villages of Asfordby, Frisby on the Wreake and Kirby Bellars.' However there is approximately 1.5 kilometres between Frisby and the settlement of Kirby Bellars to the east suggesting there is no immediate threat of the settlements coalescing. Policies being proposed through the emerging Local Plan to protect environmental, landscape and heritage assets are already sufficient to ensure there is no wholesale erosion of the open space between these</p>	Richborough Estates	<p>4.1-4.5 The criteria used for assessing the need or justification for AofSs are:</p> <ul style="list-style-type: none"> <li>• There is not a realistic risk of the named settlements coalescing during the lifetime of the Plan so this was disregarded</li> <li>• BUT The settlements are currently separated by open or undeveloped countryside;</li> <li>• AND The distance between the Limits to Development defined by the Plan is 1500m or less (e.g. as between Long Clawson and Hose in MBC Areas of Separation, Settlement Fringe Sensitivity and Local Green Space Study 2015).</li> </ul> <p>The new MLP is not yet in place.</p>	<b>NP updated with new AOS' for the parish</b>	<b>Developer on behalf of a resident landowner</b>



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		<p>settlements.</p> <p>4.3 The proposed 'Area of Separation' between Frisby, Asfordby and Kirby Bellars was put forward through the Issues and Options consultation on the Melton Local Plan and accordingly assessed in detail through the 'Melton Borough Areas of Separation, Settlement Fringe Sensitivity and Local Green Space Study' (September 2015) prepared by landscape architects Influence as a key evidence base document for the Local Plan. The appropriateness of the proposed 'Area of Separation' was assessed against set criteria established by Influence. These include consideration of topography and skyline; landscaping scale and pattern, including cultural/ historic pattern; aesthetic and perceptual quality including landscape experience/ recreational value and tranquillity; and views, visual character and intervisibility.</p> <p>4.4 Following the assessment, the 'Areas of Separation, Settlement Fringe Sensitivity and Local Green Space Study' concluded that although the area is</p>		<p>The MLP study supported the AOS in principle because of the landscape character, but deemed to be unnecessary due to natural landscape features such as the River Wreake and the railway line. It is accepted that whilst the River Wreake and the railway line provide some measure of separation, the river is merely 10m wide and vehicular access across the track is already available so diminishing its function as a barrier to development. The parishioners of Frisby on the Wreake wish to define an AOS between Frisby on the Wreake and Asfordby to preserve the rural setting and distinct characters of the settlements.</p>		
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		<p>sensitive in part to development, the sense of separation would be maintained by existing landscape features and constraints and that it is therefore not necessary to designate this area as an area of separation in the Local Plan. It should be noted that the Study did identify other critical locations in the district where an 'Area of Separation' was deemed appropriate and this has been translated into Policy EN4 of the emerging Local Plan.</p>		<p>4.4</p>  <p>Since the publication of the Study, significantly more land between Asfordby and Frisby has been given Planning Approval (see map above) (for 149 houses reaching to the river parish boundary) and another Application is under Appeal for a further 100 houses which would be closer along river boundary and bring the ltd of the two villages to around 500m. It is reasonable, therefore to reassess the parameters.</p> <p>4.5 The parameters have changed. LTDs have been extended and new</p>		
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		<p>4.5 The potential for an ‘Area of Separation’ to the east of Frisby has therefore already been robustly assessed and dismissed through the emerging Local Plan process. On this basis, it is not considered justified for the draft NP to now be proposing to designate this area as such.</p> <p>4.6 Furthermore, the approach taken in the draft NP whereby the proposed ‘Area of Separation’ is identified through a clearly defined boundary on the plan is contrary to the approach taken in strategic Policy EN4 contained in the emerging Melton Local Plan (Pre-Submissions Draft) whereby the proposed ‘Area of Separation’ in the district are more broadly defined. As paragraph 7.4.3 of the supporting text to Policy EN4 of the Local Plan states ‘Areas of Separation do not have a defined boundary because their purpose is not to prevent all development within the AoS [Area of Separation], but rather to prevent development which would result in</p>		<p>developments permitted, including your own. Your comments have been noted and a new AOS map has been included to balance your comments v’s the needs of the parish.</p> <p>4.6 The comment quotes MLP ENV4 correctly, but ENV 9 is not worded to prevent all development, so (as above) it is in general conformity. The AOS in the NP has been reduced in size and the edges are not defined. MBC has supported AoS in other NPs that are not in the Local Plan. In response to your argument, the AoS will be decreased in area between FOTW and Asfordby and will be removed between Kirby Bellars and FOTW.</p> <p>4.7 As above. The AOS in the NP has been reduced in size and the edges are less defined.</p>		
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		<p>coalescence and harm to individual settlement character’.</p> <p>4.7 In light of the above, Richborough Estates object to Policy ENV9 in the draft NP on the grounds that it is insufficiently justified and would fail to meet the basic condition set out in paragraph 8(2) of Schedule 4B to the Town and Country Planning Act 1990 that the neighbourhood plan must be in general conformity with the strategic policies contained in the development plan.</p>		<p>Policy ENV9 is in general conformity with the emerging Local Plan, but the community wishes to apply the principle to the area between Frisby and Asfordby. The Study referred to was a consultation document [other Neighbourhood Plans are proposing AofSs that were not mapped in the Study</p>		
109	Figure 18, p48 & Figure 20, p51	The plans are too small to be able accurately identify the areas of land being referred to. A detailed plan which can be enlarged clearly on an electronic device should have been provided.	Rebecca Hayward	Noted NP updated	<b>Fig 20 legend updated</b>	<b>*Non-Resident Landowner</b>
110	Page 61 – Public Rights of Way	I agree, we regularly walk the footpaths around Frisby, Hoby, Gaddesby etc and crossing the A607 is often rather hair raising!	Sarah Meadows	Noted and agreed thank you for your comment	<b>No change</b>	<b>Resident</b>
111	Subsection “Other sites of environmental significance, pp. 50-52	The section of text and linked map on “other sites of environmental significance” on p. 50 are rather ambiguous in their current form. There is no clarity what the “other sites” are (in terms of exhaustive list of areas) and what are the implications of identifying them in the plan. The text of the section	Prof J Paavola	Noted the inventory only covers the area to the North of the A607 and the entire parish is shown in the diagram because the LCC phase 1 ecology survey identifies further sites to be included. The Inventory will be completed in more detail for	<b>Appendix C updated with more detail for accessible areas in the parish to the south of the A607.</b>	<b>Resident Landowner</b>


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		is quite open-ended and the map is not accurate and remains difficult to interpret. The areas indicated in the map on p. 50 are not all mentioned and characterised in the environmental appendix of the neighbourhood plan. More transparent and detailed information and rationale for other sites of environmental significance should be provided		accessible areas of the parish before progressing the NP to Reg 16. Thank you for your very prescriptive comment. If you would like to see the LCC report it can be provided, I am sure, by Karen Headley at LCC.		
112	Page 54, Policy ENV3	There doesn't seem to be any justification given for the onus placed on developers to replace trees on a "two-for-one" basis.	Melton Borough Council	Noted as Leicestershire has one of the lowest cover of woodland in the country it is vital to maintain and improve to encourage native planting.	<b>NP updated to include the statement Leicestershire has one of the lowest cover of woodland in the country it is vital to maintain and improve to encourage native planting.</b>	<b>Statutory Consultee</b>
113	Page 55, Biodiversity	Reference could be made to the Melton Borough Council Biodiversity and Geodiversity (2016) Evidence	Melton Borough Council	Noted. This paper was just one of many sources used. NP update to include reference.	<b>NP updated with Ref Melton Borough Council Biodiversity and Geodiversity (2016) LRWT nature spot</b>	<b>Statutory Consultee</b>
114	Page 62, Env 7	Minor point – Box cuts bottom of text off.	Melton Borough Council	Noted NP update	<b>NP box tidied and made larger</b>	<b>Statutory Consultee</b>
115	Page 62, bullet points	A number of the bullet points are repeated.	Melton Borough Council	Noted NP updated	<b>NP updated to have one set of bullet points on dog hygiene only</b>	<b>Statutory Consultee</b>

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116	Page 64, Policy Env8	Much of what is included in this policy forms part of the existent planning system, it is queried whether it needs to be repeated. Moreover, caution must be raised at policies which could increase the planning burden on developers as they may argue this to be unreasonable	Melton Borough Council	The respondent does acknowledge that ENV8 only duplicates 'part' of the existing MBC policy. It maintains a standard of development that is sought. The windfall definition of 5 or less is indeed in the pre-submission local plan, but the NP is likely to be Made before the LP is Adopted.	<b>No change</b>	<b>Statutory Consultee</b>
117	Page 65, Figure 25	Frisby Neighbourhood Development Plan, Page 65, Figure 25 This figure seems to incorrectly draw the limits to development and should show the NDP's second allocation.	Melton Borough Council	Noted. Figure 25 has been corrected.	<b>NP updated to reflect the LTD accurately</b>	<b>Statutory Consultee</b>
118	Page 66, Policy ENV 9	This evidence should have due regard for the Local Plans evidence. Where is the evidence that these Areas of Separation are required? i.e. is there development pressure which could result in coalescence and harm to settlement character? Again, rationale for deviation from adopted Local Plan evidence will be required to ensure sound examination and to resist potential challenge	Melton Borough Council	As MBC is aware, since the publication of the 2015 Study, significantly more land between Asfordby and Frisby has been given Planning Approval (see map) (for 149 houses reaching to the river parish boundary) and another Application is under Appeal for a further 100 houses which would be closer along river boundary and bring the ltd of the two villages to around 500m. It is reasonable, therefore to reassess the	<b>NP update with new AOS map and evidence.</b>	<b>Statutory Consultee</b>

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				<p>parameters.</p>  <p>The 'Melton Borough Areas of Separation, Settlement Fringe Sensitivity and Local Green Space Study' (September 2015) supported an AOS here because of landscape character but was deemed unnecessary because of the physical barriers of the River Wreake and the railway. However, the river is merely 10m wide and there is already vehicular access across the railway, and development pressure around the village has never been greater. The AOS has, however, been reduced in size to address your concerns.</p>		
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119	Page 69, Policy ENV 10	The policy appears to seek a site-specific flood risk assessment for all development. This is not in conformity with the NPPF. Reference the Melton Strategic Flood Risk Assessment 2015 and Addendum 2016 as evidence. Para 4.4.5 refers to Frisby Lakes flood defences. Fig. 9-4 illustrates National Flood Risk Assessment mapping for Frisby. Fig. 9-5 illustrates defended and undefended flood risk areas for Frisby	Melton Borough Council	Noted the environment Agency Reg 14 comments have updated and supported this policy. NP updated	<b>NP updated with EA reg 14 updates. Strategic Flood Risk Assessment 2015 and Addendum 2016</b>	<b>Statutory Consultee</b>
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

### Appendices

Plan section/ policy number	Comments	From	Response	Proposed amendment
	Appendices in most cases unnecessary and particularly appendix g	John Greaves	Noted.	<b>No change</b>
Appendix B	Appendix B – are pages 5 and 6 intentionally duplicated?  - House sales: I was astonished to note the volume of house sales over the past 20 odd years – remarkable and perhaps demonstrates the popularity of the village.	Chris Lawman	Noted and the NP Appendix B updated	<b>NP updated to remove 1 copy of Appx B</b>
	Appendix G page 7 Grand Total column is misplaced	Ash Howe		
Appendix F page 12	Third paragraph after open views add ‘but to the detriment of existing residents on Great Lane	Bob Widdowson	Noted and accepted	<b>Appx F amended to include “but to the detriment to the existing residents on Great Lane”</b>
Appendix F page 15	There is a bus service 128 to Leicester and Melton. This is a two-hourly service in each direction. It does not run on a Sunday. This applies to the same comment on pages 20 and 23.	Chris Lawman	Agreed unable to change as P15 MBC supplied information but NP amendment in transport section.	<b>Amendment made to P31 in the transport section “There is a bus service 128 to Leicester and Melton. This is a two-hourly service in each</b>

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				<b>direction. It does not run on a Sunday”.</b>
Page 15	Noise – should contain a comment about the dog Kennels.	Bob Widdowson	Unable to change – formal document imported into the plan.	
<b>Appendix I</b>	<p><b>Appendix I</b> of the Plan lists the <b>Community and Consultation and Open Events</b>. Sustainability Assessments were commissioned from Your Locale in May 2016 (page 2). However, their assessment, presumably prepared by professionally qualified people, was rejected on August 9<sup>th</sup> 2016 “as not being objective, accurate or sufficiently professional to be submitted as evidence...” So what did a professional company prepare and how was the analysis revised? By whom? On what objective basis? And how were the changes justified?</p> <p>So, for example reviewing FRIS 2, Water Lane, the scoring evidence on P4 of Appendix F first remarks that a planning application has been received and then proceeds to score the site, ignoring the evidence it knows is available.</p> <p>Without listing all the errors, but as an indication of the concerns: Crit 1 Site capacity meets the MBC requirement (the emerging Local Plan requires at least 14 dwellings of this site). This is achieved so a red is inappropriate and instead should be a green.</p> <p>Crit 8 Landscape Quality is shown as red, but ignores the different evaluation in the Landscape Study as part of the County Highway Authority.</p> <p>Crit 19 Safe Highway Access is shown as red, but the planning</p>	Landmark Planning	<p>The emerging LP does not require 14 dwellings on this site, it requires 78 houses in FOTW. The scoring is based upon site applications to MBC.</p> <p>Noted not accepted</p> <p>Independent engineer report</p>	<p><b>No Change</b></p> <p><b>No Change</b></p>

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	<p>application clearly shows that this is acceptable and has been confirmed by the County Highway Authority.</p> <p>Crit 26 refers to noise issues. Again, as the planning application supporting information confirms, this issue has been resolved.</p> <p>Crit 28 relates to flooding issues and scores the site a red. As the planning application clearly shows not only is this not a problem, but the proposal can resolve the problem already identified in terms of flooding to Water Lane on P67 of the Plan. The proposal is a positive benefit not a negative and should be scored accordingly. Crit 29 Drainage as 26 and 28 above.</p> <p>It is interesting to compare this analysis of FRIS 2 with the overall analysis of FRIS 4 Rotherby Lane. It is not known whether the latter site is available and certainly no detailed analysis has been undertaken. The analysis must be speculative at best. It is clearly flawed in places.</p> <p>Crit 13, as an example, scores Listed Buildings or important assets as an amber. Yet there is a listed building within the site and any development will fundamentally change the relationship with the farm building's setting. Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990* places a statutory duty that special regard must be had to the desirability of preserving the setting of the listed building. This is not acknowledged.</p> <p>Later in the document (Appendix F) P8 the view upon FRIS 2 is summarised. It is well placed to be integrated into the village and has easy access to all amenities.</p>		<p>by Sandersons submitted to MBC refutes this statement</p> <p>EH has severe concern re current and future night noise and there is a danger to public health.</p> <p>EA have confirmed the site is within flood Zone 2 and therefore is governed by national policy. Under review by MBC</p> <p>Noted FRIS4 has been withdrawn</p> <p>The listed building in FRIS4 is in need of renovation which would have been addressed as part of the site development</p>	<p><b>No change</b></p> <p><b>No change</b></p> <p><b>No change</b></p> <p><b>No change</b></p> <p><b>No change</b></p>
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	<p><i>“However, major concerns surround the development in terms of its proximity to the railway line and the river, as well as its impact on local traffic.”</i></p> <p>Somehow it then says it could be suitable for social housing. The planning application that has been submitted has resolved the three technical issues to the satisfaction of the statutory bodies, so these should not be an issue.</p> <p>At the same time I have great difficulty in accepting the proposition that these problems make it only suitable for social housing. Socially divisive or what must be a question to be asked? Finally, social housing is realistically only going to be achieved with cross subsidy by private housing in Frisby. There are no proposals for any alternative solution; so private housing is needed if the objective of social housing is to be achieved.</p> <p><b>What the Village voted for:</b></p> <p>This voting was based on choosing combinations of options and you could only choose one of the options. The Rotherby Lane site (FRIS4) figured on all 5 options meaning its selection was guaranteed. This form of option choosing is similar to elections in non-democratic countries with only one name of the ballot paper. The process is therefore totally unacceptable.</p> <p>This is made even more pertinent as the other sites such as FRIS1 Great Lane (80%); FRIS2 Water Lane (60%); and, FRIS3 Land to the south had only a 40% chance of selection. There is a clear and unacceptable bias to favour particular sites.</p> <p>Furthermore, as explained above on Page 2, there are many uncertainties about the delivery of the site FRIS4 Rotherby Lane and this is the one that is guaranteed to be included.</p> <p>The whole process of consultation is therefore fundamentally</p>		<p>MBC identified the site as “suitable for social housing” on the SHLAA document. This is not supported by the NP or their view. We recommend P10 of Appx F is re revisited by Landmark.</p> <p>FRIS 4 features in 3 of the options offered as a site choice. FRIS 2 features in 3 of the options offered as a site choice. FRIS 4 addressed in previous comments</p>	<p><b>No change</b></p> <p><b>No change</b></p>
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	<p>flawed and cannot be relied upon as a basis for taking the Neighbourhood Plan forward.</p> <p>There are a number of very important questions to be resolved about the strategic context; the process in the preparation of this Plan; as well as the actual content of the document. The Plan does not satisfy the required Basic Conditions for soundness. This coupled with the evidence questions identified means that it is not possible for an Examiner to be comfortable with the emerging Plan. This is compounded by the analysis in this document, which seriously calls into question the analytical basis upon which this Plan has been conceived.</p>			
<p><b>Appendix A: Guidelines for Building Design</b></p>	<p>6.1 Appendix A re-iterates best practice advice in relation to the design of new development and provides a useful analysis of local character and architectural features.</p> <p>6.2 Richborough are alarmed however by the first bullet point under 'Local Factors' which appears to recommend a buffer zone of 50-100 metres between new development and adjacent housing. A separation distance of this size is wholly unrealistic. This is evident in the fact that a distance of 100 metres from the nearest residential property in both of the proposed housing allocations (FRIS 1 and FRIS 4) would encompass more than half of the site in each instance. A requirement to achieve a buffer of up to 100 metres would therefore drastically reduce the amount of dwellings which could be accommodated on each site. It would also result in new developments which do not relate well to the existing settlement.</p> <p>6.3 Given the above, Richborough Estates urge the Action Group to</p>	<p>Richborough Estates</p>	<p>Noted plan to be updated</p>	<p><b>NP amendment reduced size of buffer zone to 20-30mtrs between existing building and new buildings</b></p>

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	reconsider this element of the draft guidelines.			
<b>Appendix C</b>	It has been brought to the attention of the authority that this appendix was changed (albeit through a administrative error) during the consultation. It may prove prudent to create a note for circulation outlining the changes made and the rationale behind it.	Melton Borough Council	The published Appx C had 2 editing errors on sites 16 and 27 so the original working document was uploaded immediately it came to light. All LGS landowners were informed on that day of the document change.	<b>NP updated with correct information and revisions</b>
	<p>The area covered by your Neighbourhood Plan encompasses Frisby on the Wreake Conservation Area and includes a number of important designated heritage assets including the Church of St Thomas of Canterbury (listed grade I) and the Village Cross scheduled monument. In line with national planning policy, it will be important that the strategy for this area safeguards those elements which contribute to the significance of these assets so that they can be enjoyed by future generations of the area.</p> <p>We note that the proposals include housing allocations. The supporting evidence required for these will be the same as that required for local plans, and we therefore refer you to Historic England Advice Note 3: The Historic Environment and Housing Allocations in Local Plans, a copy of which I have attached. Historic England have made representations to Melton Borough Council on 4/12/16 about these housing allocations that are also set out in the on the Local Plan, setting out concerns relating to potential effects on the historic environment:</p> <p>Sites FRIS1 – 4 are adjacent to the Conservation Area and other heritage assets and this is not adequately reflected within the policies or assessments in order to ensure a sound plan; although</p>	Historic England	FOTW residents value the heritage both within and beyond the parish. The need to safeguard heritage assets is central to the NP and is referenced regularly, including a section identifying heritage assets and a requirement that heritage assessments are undertaken where necessary.	<b>NP update in the section on housing Policy H4 “existing heritage assets will need to be conserved and enhanced through the layout, design and detailing of schemes.”</b>

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	<p>criteria in relation to 8 Rotherby Lane in policy FRIS4 is welcomed. FRIS1 forms an important section of the historic landscape setting to Frisby on the Wreake Conservation Area to the west and other heritage assets including the Grade I listed Church of St Thomas of Canterbury, at the entrance to the village. The site also includes what appears to be part of a well preserved and coherent area of ridge and furrow contributing as setting to the significance of the designated assets and the wider historic landscape character.... Development of sites FRIS1-4 will only be supported where it is illustrated through the layout, design and detailing that the heritage assets will be conserved and enhanced.</p> <p>If you have not already done so, we would recommend that you speak to the planning and conservation team at Melton Borough Council, together with the staff at Leicestershire County Council who look after the Historic Environment Record. They should be able to provide details of the designated heritage assets in the area together with locally-important buildings, archaeological remains and landscapes. Some Historic Environment Records may also be available on-line via the Heritage Gateway (<a href="http://www.heritagegateway.org.uk">www.heritagegateway.org.uk</a>). It may also be useful to involve local voluntary groups such as the local Civic Society or local historic groups in the production of your Neighbourhood Plan.</p> <p>Historic England has produced a number of documents which your community might find helpful in helping to identify what it is about your area which makes it distinctive and how you might go about ensuring that the character of the area is retained. These can be found at:-  <a href="http://www.helm.org.uk/place-and-placemaking/communities/neighbourhood-planning/">http://www.helm.org.uk/place-and-placemaking/communities/neighbourhood-planning/</a>          You may also find the advice in “Planning for the Environment at</p>		<p>Thank you. These sources have already been accessed. References made to them in the NP will be checked.</p>	<p><b>Add reference to <a href="http://www.heritagegateway.org.uk">www.heritagegateway.org.uk</a> on p27</b></p>
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	<p>the Neighbourhood Level” useful. This has been produced by Historic England, Natural England, the Environment Agency and the Forestry Commission. As well as giving ideas on how you might improve your local environment, it also contains some useful further sources of information. This can be downloaded from:</p> <p><a href="http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf">http://webarchive.nationalarchives.gov.uk/20140328084622/http://cdn.environment-agency.gov.uk/LIT_6524_7da381.pdf</a></p> <p>If you have any queries about this matter or would like to discuss anything further, please do not hesitate to contact me Historic England</p>			
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# **Regulation 14 Consultation Local Green Space Comments**

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

### LGS Regulation 14 comments – Frisby on the Wreake

#### Housing and Built Environment

No.	Plan section/ policy number	Comments	From	Response	Proposed amendment	Status
1.		<p>I am in receipt of two letters from you dated 6.2.2107 and for which I thanks you. I would direct a response to Frisby of the Wreake PC as follows;- Our only involvement with the Neighbourhood Plan Group occurred recently when we were approached by one of their number on the advice of MBC planning policy office Mr James Beverly in his email to scott Bailey dated 19.1.2017. During the course of that meeting I was made aware of MBC’s poor quality transcript of representations made by my brother and I regarding MB Local Plan pre submission draft. In view of this I have allowed full copy of those representations to be taken with the request that this information be forwarded to the PC. Since then I have also requested that copy of a final exchange of Valerie Adams and I should be included with the information. Consequently the information which the PC now have will inform as to why we oppose any move to identify part of the site which we have offered for development as Local Green Space as it would prevent the farm relocation which we are seeking. We would point out an apparent inconsistency in the way LGS policy is being applied to respect of grass paddocks attached to each of the properties knows as the Cedars and the Limes. We do not believe that the policy should be used simply to block proposals which you have been alerted to. It should also be recognised that if our site were to be included in an arable rotation any LGS designation would appear to lose all credibility. There is another aspect of this planning process which we would ask you to consider.</p>	SG Wood	<p>The LGS scores are based on an assessment of each site in their own right and have not been produced in order to block development proposals. MBC had already rejected the site from the shlaa process when the site was scored for the Environmental Inventory.</p>		<b>Resident Landowner</b>

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>Mr Beverly states in his email referred to above that MBC decided to subdivide site MBC/036/16 into parts a and b. As I have previously made clear, that decision was made without consultation or agreement with the site owners but now more importantly now perhaps I a told by the NPAC that neither they or the PC were aware that the site was offered as a single entity. MBC failure to disclose its decision may have produced a significant maladministration if in so doing it misled the PC or distorted consideration by them of either support of opposition to the proposed scale of development elsewhere in the parish including the Great Lane</p>		<p>The paddock (27) attached to 'The Cedars' is designated LGS in the Draft NP. The paddock attached to 'The Limes' did not achieve the score required for LGS.</p> <p>However, reassessment of the score relating to 'Proximity' from 3 to 2, in line with Field 18 (behind Mill Lane) reduces the total score for this field. This means the field will now be placed in the category Other Sites of Environmental Interest instead of LGS.</p> <p>There are numerous issues stated here that need to be addressed to Melton Borough Council not FPC.</p>	<p>NP update. Remove Field 28 from LGS category and add to Other Sites of Environmental Interest. Update Appendix C: field 28 score for Proximity changed from 3 to 2, adjust total score 23.</p> <p>No change.</p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>site. Be aware also that whilst Mr Beverly makes the assertion in his email to Scott Bailey referred to above that issues about site MBC/036/16 are freshly emerged from the recently held Local Plan consultation. Our email to Head of Regulatory services Mr Worley dated 5.11.16 shows effectively that this situation was brought to their attention much earlier but clearly has not been acted upon.</p> <p>We would also ask you to consider that whilst the NPAC wished to designate the furthest reaches of site MBC/036/16 as being outside the LTD, it is noticeable that the site is within easier and shorter walking distance to village facilities than the furthest reaches of the Great Lane site. Their support for the scale of that site and indeed their advocacy for its being further extended would therefore seem questionable. Finally we would ask you not to stand in the way of the farm relocation which we are seeking.</p>		<p>The issue of accessibility to services is only one of a large number of factors that led to the ranking of potential housing sites. Planning permission was given to the land on Great Lane in January 2017 before the Draft NP was published.</p> <p>As the last remaining working farm in the village, your farm and Grade II listed house is much valued by the community. Have you considered applying to the Historic Building Grant Scheme to aid renovation?</p>	<p>No change</p> <p>No change</p>	
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### Environment

No.	Plan section/ policy number	Comments	From	Response	Proposed amendment	
2.	Page 48 POLICY ENV 1: PROTECTION OF LOCAL GREEN SPACES Village allotments	It would appear that the NPAC has either not done its homework, or has decided arbitrarily to give this “green space” the title “village allotments”. The land to which the NP refers has been and remains PRIVATE LAND, and is owned by myself and my sister-in-law, Mrs Anita Cook. We have to date allowed the existing allotment users continued access to the land for a peppercorn rent. This in no way implies that the Parish Council or indeed the village as a whole has any rights to use or indeed have access to the land. If	David Cook	NPAC has used the common village parlance for a site that has been used by the village as allotments for decades. There is no inference or statement that this land is	<b>NP amend. Change classification of site 57 to Other Important Open Space.</b>	<b>Non Resident Landowner</b>

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	<p>behind The Bell inn, Frisby on the Wreake (057)</p>	<p>the FPC persists with this proposal they should consider using the term "<u>former</u> village allotments</p>		<p>not privately owned. This comment appears in the outgoing MLP and still applies today "<i>The allotment/paddock area to the rear of the Bell (PH) is also important to the form of the conservation area.</i>" These are very popular heavily used allotments, across the resident age spectrum, as evidenced by a waiting list. This is due to their convenient location within the village, rather than by a long walk/short car journey to reach the other allotment site in the fields beyond Mill Lane. It would be a great loss to residents should the current use be changed due to simple misunderstanding over nomenclature. The classification of your private land will be changed from LGS to Other Important Open Space. Please note that Policy CF1</p>	<p><b>NP p44 amendment to include references to existing allotment areas in the parish under Community Facilities section p44 of NP.</b></p>
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

				'Retention of Community Facilities and Amenities' is also relevant to this site, as is the draft MBC LP Policy EN3 (retention and enhancement of existing green infrastructure).		
3.	Policy ENV1	I am strongly in support of Policy ENV1 for the protection of the local green spaces and the Community Action CAENV1. These are vital areas within our community and should be preserved.	S Heaney	Noted and thank you for your support. Areas of land (28 and 57) denoted in Policy ENV 1 have been removed in response to other comments received during reg 14.	<b>No change</b>	<b>Resident</b>
4.	Page 46 to 48	We object to allocation of 'Dawson's Fields at Frisby edge 001' as 'Local Green Space'. See supporting assessment of land.	The Dawson Family	Comment repeated. See response to comment 5.	<b>No change</b>	<b>*Non-resident Landowner</b>
5.	Policy ENV1 : Protection of Local Green Spaces	<p>We object to allocation of 'Dawson's Fields at Frisby edge 001' as 'Local Green Space'. See supporting assessment of land.</p> <div style="border: 1px solid #ccc; padding: 5px; margin-bottom: 5px;">  1713 - appendix A - Plans of the site and surroundings <span style="float: right; font-size: small;">Date modified: 21/03/2017 08:15 Size: 2.20 MB</span> </div> <div style="border: 1px solid #ccc; padding: 5px; margin-bottom: 5px;">  1713 - appendix B - Viewpoint information <span style="float: right; font-size: small;">Date modified: 21/03/2017 08:15 Size: 10.6 MB</span> </div> <div style="border: 1px solid #ccc; padding: 5px; margin-bottom: 5px;">  1713 - appendix C - Links to key sources <span style="float: right; font-size: small;">Date modified: 21/03/2017 08:15 Size: 94.4 KB</span> </div> <div style="border: 1px solid #ccc; padding: 5px; margin-bottom: 5px;">  1713 - Landscape Report - Land off Rotherby Lane, Frisby on the Wreake <span style="float: right; font-size: small;">Date modified: 21/03/2017 08:15 Size: 187 KB</span> </div> <p>Welch Design Chartered Landscape Architects 'Landscape Report'</p>	The Dawson Family	The documents (totalling over 12 MB) supplied with this comment in the Reg 14 consultation could not be reproduced in their entirety without making this response document unwieldy. Therefore, only the Landscape Report written by Welch Design Chartered Landscape Architects, forming the main part of the objection,	<b>No change</b>	<b>*Non-resident Landowner</b>

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>1.0 Introduction</p> <p>1.1 Background</p> <p>This report relates to the land off Rotherby Lane called Dawson’s Fields and referenced in the Frisby on the Wreake draft Neighbourhood Plan (NP) as site 001, hereafter referred to as ‘the site’.</p> <p>This report has been prepared in conjunction with the consultation period of the draft NP on behalf of the land owners, along with Grace Machin Planning &amp; Property who submitted representations on the land in December 2016 in relation to the Pre-Submission Draft Local Plan.</p> <p>This report aims to identify the sites landscape value, visual amenity, and other assets in order to assess the suitability for Local Green Space (LGS) designation in the NP.</p> <p>It includes a thorough description of the site in its current state and its surroundings, in terms of landscape and visual characteristics, linking to landscape character and historical background.</p> <p>1.2 The site and the NP proposals</p> <p>The context of the site is show on plan 1713.0.1. The existing site is shown on plans 1713.0.2 to 1713.0.5. Proposed development is outlined on plan 1713.0.5. These plans are all in appendix A.</p> <p>The draft NP proposes designating the site as Local Green Space (LGS). Further information on the NP and this type of designation is given in section 3.0. The full draft NP and their appendices can be found on the</p>		<p>has been inserted here.</p> <p>(Responses are aligned to the points being addressed.)</p>		
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>Frisby on the Wreake Parish Council (FWPC) website, links to these are included in appendix C.</p> <p>1.3 The study area</p> <p>The area studied in this report includes the site itself and its surroundings.</p> <p>The study area and selected viewpoints have been selected through physical site visits and professional judgement.</p> <p>Key sources of information for the study will include: - the relevant national character area (NCA) profile - the local authorities – Melton Borough Council (MBC) and Frisby on the Wreake Parish Council (FWPC) - the relevant landscape character assessment (LCA)</p> <p>- the authority’s adopted local plan - site visits - OS maps - the online ‘Magic’ map which collates information from across various organisations</p> <p>1.4 Report structure</p> <p>In part, this report has been written with reference to the Guidelines for Landscape and Visual Impact Assessment, 3rd edition (GLVIA3) by the Landscape Institute and Institute of Environmental Management &amp; Assessment. These guidelines have been used to provide a practical report structure and assessment methods as far as they are relevant.</p> <p>To clarify, this is not a Landscape and Visual Impact Assessment, as that form of assessment must relate to a specific proposed development, which does not exist for this site.</p>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>The report is structured as below: - Landscape and visual baseline report – a report on the study of the site and the surroundings - Proposed LGS designation description – a description of the NP proposals, relevant National Planning Policy Framework (NPPF) information and the NP environmental inventory assessment method - Analysis of the site against certain criteria and evaluation of the relevance of those criteria - Summary and conclusions – a summary of the previous sections and conclusions that can be drawn from the information set out</p> <p>2.0 Landscape and Visual Baseline Report</p> <p>2.1 Introduction</p> <p>This baseline includes information about the existing landscape and visual elements of the site and surroundings. It is necessary to establish this information in order to assess the criteria which decides the suitability of the site for LGS designation.</p> <p>In terms of landscape, this report includes existing official designations, land use, planting, public amenity, character, perceptual qualities, topography, and historic character. For the visual baseline, this report will include information about visibility of the site from the surroundings and details of the people who may experience views of the site.</p> <p>From this information, the relevant characteristics, along with key viewpoints can be assessed, as set out in section 4.0.</p> <p>The existing site context and layout, along with the areas referred to in the descriptions below, can be seen on plans 1713.0.1 to 1713.0.5 in appendix</p>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>A.</p> <p>2.2 The site</p> <p>The site is a field and is mainly bounded by other fields. To the north is Rotherby Lane and to the south is Leicester Road (A607).</p> <p>The local authorities are Frisby on the Wreake Parish Council (FWPC) and Melton Borough Council (MBC). The site lies within the Melton Borough landscape character assessment (LCA) area 12, named Wreake Valley, and national character area (NCA) number 74: Leicestershire and Nottinghamshire Wolds. Links to the LCA and NCA information can be found in appendix C.</p> <p>The site has boundary planting on all sides, including mature trees, and some individual trees within the site. The boundary planting is thicker in the north section of the west boundary, against Gated Road, as shown on plan 1713.0.3.</p> <p>There is one public right of way (PROW) across the site, footpath reference H46. This runs down the eastern side of the site linking Rotherby Lane at the north of the site and the A607 to the south. The PROW is accessed by a stile at the north end and a metal kissing gate to the south.</p> <p>The site has a pattern of ridges and troughs in the land, characteristic of ridge and furrow farming methods used in medieval times. The distinction of the pattern varies through the site. Ridge and furrow patterns are seen in fields throughout the local area.</p> <p>This site is classed as grade 3a/b agricultural land meaning it is of good to</p>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>moderate quality. The NCA profile and draft Local Plan (LP) describe the soil as lime-rich and clayey, with impeded drainage. The NCA considers this moderately fertile land for agriculture. However, these classifications only consider the soil type and quality. Another consideration is the ridge and furrow form of the land, which can present a problem to modern farming practices and may lower the agricultural value.</p> <p>The whole site is within a nitrate vulnerable zone, meaning that there are restrictions on the amount of fertiliser that can be applied and the times of year it can be spread.</p> <p>According to the Environment Agency maps, the site is not at risk of flooding from rivers and is at a low to very low risk of surface water flooding. The site is outside the River Wreake floodplain. The LCA describes the areas outside the floodplain as less sensitive than those within it.</p> <p>Although the site is within the LCA area called the Wreake Valley, the south part of the site is almost flat and is part of the plateau to the south. The north, sloping part and south, flat part of the site are shown on plan 1713.0.3. The north part of the site dips down, towards the village and the River Wreake.</p> <p>Also shown on plan 1713.0.3 is the line where electrical lines cross the site, the existing individual trees and small ponds on site.</p> <p>2.3 North of the site</p> <p>The north of the site is bounded by a hedgerow separating it from Rotherby Lane and the entrance to the public footpath. Rotherby Lane is under the national speed limit and becomes a 30mph road approximately halfway</p>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>along the site boundary when entering Frisby on the Wreake.</p> <p>Opposite the site is a private residence and the plot of land FRIS4, which is earmarked as a reserve site for 24 units. Partially opposite and to the north-west is the area named 028 in the draft NP, which is suggested for allocation as LGS. Off Rotherby Lane, opposite the site, are the entrances to all of these areas.</p> <p>The site can be seen from Rotherby Lane through its gateway and stile entrances, and may be glimpsed through the mature boundary planting at various points, depending on the time of year and foliage growth. These views are included in appendix B.</p> <p>The village of Frisby on the Wreake is to the north and north-west of the site. The village includes a total 12 grade two listed buildings and one grade one listed building, the Church of St Thomas of Canterbury.</p> <p>The Post Office and shop, the village hall and the Bell Inn are all examples of important facilities for the community in the village.</p> <p>On the north-west edge of the village is site FRIS2. This is allocated for a housing development of 14 units. The boundary of this site meets the railway, which is effectively the northern boundary of the village.</p> <p>The areas to the north of the site are described in the draft Local Plan (LP) as being at a medium/high sensitivity to development, with the land to the north of the River Wreake having a high sensitivity.</p> <p>The River Wreake is a meandering river, which flows south-west from Melton Mowbray to near the town of Syston, where it joins the River Soar.</p>		<p>FRIS 4 has been withdrawn from the NP as it is no longer considered deliverable. Site 028 has been reclassified as Other Sites of Environmental Importance</p> <p>FRIS 2 was not a chosen housing site in the NP. The existing Planning Application is therefore not supported by the community.</p>	<p><b>No change</b></p> <p><b>No change</b></p>	
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		<p>Although canalised in the 18th century, which included creating several diversions, it fell in disrepair and now provides an excellent habitat for a variety of species.</p> <p>Due to the topography of the area, the site can be seen between the trees from points on Hoby Road and Washstones Lane. The north side of the site can be seen over the existing farm buildings on the site FRIS4.</p> <p>North of the Wreake Valley is the LCA 6: Ridge and Valley. The topography is significantly different here than the even land south of the valley, as described in its name.</p> <p>2.4 East of the site</p> <p>On the east boundary of the site is site FRIS3, which is one of three sites in Frisby on the Wreake earmarked for housing development. The allocation is for 40 units and, at the time of writing, there is a current outline planning application for 48 units on this site, under application number 16/00704/OUT.</p> <p>Further east, on the eastern edge of the village, is FRIS1 off Great Lane. This site is also allocated for housing development totalling 40 units.</p> <p>The LCA number 12: Wreake Valley extends over two miles to the east, where it meets LCA 20: Melton Farmland Fringe.</p> <p>Melton Mowbray is 4 miles to the east and is the nearest town to the site.</p>		<p>FRIS 3 was not a chosen housing site in the NP. The existing Planning Application is therefore not supported by the community.</p> <p>FRIS 1 was granted Planning Permission for 48 houses in January 2017.</p>	<p><b>No change</b></p> <p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>2.5 South of the site</p> <p>Immediately south of the site is the A607. Only the south half of the site is visible from here, as shown in appendix B, as the north half dips down below the ridgeline.</p> <p>Views south show that the land is almost flat and forms a plateau of higher ground between the valleys created by the various waterways in the area. In the Melton Mowbray LCA, this area is number 11: Pastoral Farmlands. The LCA describes the topography as very gently rolling.</p> <p>South of the site, near to the footpath entrance on the A607 is the remains of Stump Cross, a scheduled monument. The footpath H46 continues south from here, to the village of Gaddesby, 2.75 miles away.</p> <p>10 miles to the south west is Leicester, the closest city to the site and county town of Leicestershire.</p> <p>2.6 West of the site</p> <p>The land west of the site is mainly open countryside and agricultural land. The field pattern and footpath network continue to the west.</p> <p>The LCA area extends over 2.5 miles to the west, following the River Wreake, until it reaches the edge of the Melton Borough District.</p> <p>The only site of special scientific interest (SSSI) in the area, Frisby Marsh, is to the north west of the site, 0.3 miles to the west along Rotherby Lane. The north boundary of this SSSI is aligned with the meandering shape of the River Wreake. The area is shown in bright green on plan 1713.0.1 in</p>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>appendix A.</p> <p>Hoby and Brooksby are both approximately 1.5 miles away to the west of the site. Hoby is a small village, while Brooksby is described as a deserted village, with a 16th century manor house, Brooksby Hall, and its church, which are now part of Brooksby Melton College.</p> <p>Rotherby, another small village, is slightly closer to the site, 1.3 miles away.</p> <p>3.0 Proposed Local Green Space Designation</p> <p>3.1 Draft Neighbourhood Plan</p> <p>The draft Neighbourhood Plan (NP) has been put together by the Frisby on the Wreake Neighbourhood Plan Advisory Committee (NPAC), made up of volunteers and supported by the Parish Council and an independent company called Yourlocale.</p> <p>The consultation period, during which comments can be submitted, ends on Tuesday 21st March.</p> <p>3.2 Relevant National Planning Policy Framework sections</p> <p>Paragraphs 76 and 77 of the NPPF relate to Local Green Space designation and are set out below.</p> <p>76. Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances.</p>		<p>Please note that Brooksby has a large and thriving Agricultural College (Further Education campus) and plans for housing exist.</p>	<p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>Identifying land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should only be designated when a plan is prepared or reviewed, and be capable of enduring beyond the end of the plan period.</p> <p>77. The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used: where the green space is in reasonably close proximity to the community it serves where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife where the green area concerned is local in character and is not an extensive tract of land</p> <p>From paragraph 77 of the NPPF, the conditions for designating a Local Green Space are clear. How these criteria relate to the site and the NP assessment is discussed in section 4.0.</p> <p>3.3 Proposed local green spaces in the Neighbourhood Plan</p> <p>An Environmental Inventory is shown in appendix C of the NP. This evaluates 65 plots of land against nine criteria – access, proximity, bounded, special, recreational/educational, beauty including views, tranquillity, history, wildlife etc.</p> <p>A score is given for each criterion regarding each site, within varying ranges. The sites are colour coded and although there is no key, these colours relate to different sections within the draft NP. No descriptions of the criteria are</p>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>included and no explanation of each criterions weight in deciding suitability for designating a LGS is given. On 10.03.2017, the Frisby Parish Clerk, and the Neighbourhood Plan Advisory Committee Chair and Vice Chair were contacted by email for further information on the methodology used, but no information was supplied before the end of the consultation period.</p> <p>It appears that the eight highest scoring sites are those that have been selected for designation as LGS. As there is no methodology or clarification available alongside this process, it must be reasoned that this outcome could be either because there was an aim to select eight LGS sites or simply to select those scoring 24 and over. Either way, there is no clarification as to why these eight sites in particular were proposed for LGS designation.</p>		<p>There were no emails received on 10<sup>th</sup> March 2017 from the landowner or representatives to our knowledge.</p> <p>Noted. An improved rationale to the scoring has been added to Appendix C and to text in LGS and Other Sites of Environmental Significance sections.</p>	<p><b>No change</b></p> <p><b>NP update.</b>  <b>P47. Add</b>  <b>‘Sites</b>  <b>attaining a</b>  <b>score of 75%</b>  <b>or more in</b>  <b>the</b>  <b>Environment</b>  <b>al Inventory</b>  <b>were put</b>  <b>forward for</b>  <b>LGS</b>  <b>designation.’</b>  <b>P50. Add</b>  <b>‘Sites</b>  <b>attaining a</b>  <b>score of</b>  <b>20/32 or</b>  <b>more or at</b>  <b>least 50% for</b>  <b>History/Wild</b>  <b>life in the</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>4.0 Site Assessment for Local Green Space Designation</p> <p>4.1 Introduction</p> <p>As shown in sections 3.2 and 3.3, the NPPF describes several conditions for designating a site as a LGS and appendix C of the draft NP, the Environmental Inventory, sets out nine categories, some of which relate to the NPPF.</p> <p>In this section, each of the nine NP categories' relevance to the NPPF will be assessed, and the site re-evaluated against them.</p> <p>Below is a table which sets out the NP Environmental Inventory categories and the NPPF conditions and tries to associate the different assessment criteria with each other. Some of the NPPF conditions are shown in brackets as they are examples of how a site may be demonstrably special or hold local significance and not standalone conditions.</p>			<p><b>Environmental Inventory were put forward for Other Sites of Environmental Significance.' Appendix C update. Add scoring rationale sheet.</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>Neighbourhood Plan Environmental Inventory categories National Planning Policy Framework conditions Access Proximity In reasonably close proximity to the community it serves Bounded Special Demonstrably special or of local significance Recreational/Educational (Recreational value) Beauty, Including Views (Beauty) Tranquillity (Tranquillity) History (Historic significance) Wildlife etc. (Wildlife) Local in character and not an extensive tract of land Table 1 - NP categories and NPPF conditions</p> <p>In addition to the nine NP categories, whether or not the site is considered local in character or an extensive tract of land will also be included to ensure all of the NPPF conditions are covered.</p> <p>4.2 Access</p> <p>Access to the site is not one of the NPPF criteria.</p> <p>However, it is an important factor when assessing the value of green space if it is to be accessed by the public through a PROW.</p> <p>Evaluating the access to the site in this case is more specifically evaluating access to the footpath H46, as the entire site is not open to the public. Appraising access to the site is covered by the assessment of the sites proximity and recreational value.</p> <p>4.3 Proximity</p> <p>The NP Environmental Inventory does not explain the meaning of proximity for the purposes of its evaluation. For this appraisal, to ensure it is relevant to the NPPF, it will be taken to mean whether or not 'the green space is in</p>		<p>The field is proximal (adjoins) the village, therefore scores one less</p>	<p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>reasonably close proximity to the community it serves’.</p> <p>Firstly, the ‘community it serves’ can be taken to mean, primarily, the village of Frisby on the Wreake.</p> <p>The term ‘reasonably close’ is somewhat subjective. However, the site is adjacent to a private residence, opposite the site on Rotherby Lane, and adjacent to sites FRIS3 and FRIS4, which are to become part of the built area of the village.</p> <p>The Frisby village road sign and 30mph signs on Rotherby Lane signify the entrance to the village. As these are adjacent to the north boundary of the site, at least the north part of the site can be considered to be in the village.</p> <p>An additional meaning of ‘the community that [the site] serves’ is the people that use the footpath, H46, whether from Frisby on the Wreake, or otherwise. These people evidently find the site to be reasonably close, due to the fact that they are using the footpath.</p> <p>Plan 1713.0.5, in appendix A, shows the existing and future boundaries of the village, alongside the site boundary. This shows that the site is very close to the village, if not adjacent.</p> <p>In conclusion for this requirement, the site can be considered “in reasonably close proximity to the community that it serves”.</p> <p>4.4 Bounded</p> <p>The description of being bounded does not fit into the NPPF guidelines and therefore cannot influence the suitability for the site to be designated as a</p>		<p>than the maximum number of points available. (Score 3/4)</p> <p>As above, FRIS 3 was not chosen to be an allocated site by the community and FRIS 4 has been removed from the NP.</p> <p>The supplied figure does not reflect the Limits to Development in the NP as it includes sites which were rejected by the community and sites rejected by MBC as undeliverable.</p>	<p><b>No change</b></p> <p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>LGS.</p> <p>The meaning of bounded, when analysing a landscape area, can simply be taken to mean that the sites boundaries are clearly defined.</p> <p>To take this further, the site may be considered physically bounded, as the boundaries obstruct access for the most part, or partially visually bounded, as the mature planting partly impedes views. Particularly, the northern part of the west boundary, alongside Gated Road, has a thicker band of planting, creating a more significant edge.</p> <p>The site does have visually significant boundaries and can therefore be described as relatively well bounded. This may be of significance when assessing landscape or visual impacts of development, but not in designating LGS according to the NPPF.</p> <p>4.5 Special</p> <p>The description of special is used in the NPPF criteria. To ensure this links with that criteria in full, this should mean the site is ‘demonstrably special to a local community and holds a particular local significance’.</p> <p>Special and significant are both subjective descriptions to apply to a site and therefore the NPPF lists some examples of reasons for classing a site as either one.</p> <p>The local community in this case should be taken to mean Frisby on the Wreake.</p> <p>The examples given in the NPPF are listed in the NP Environmental Inventory</p>		<p>Footpath H46, the Leicestershire Round, affords the only safe access to a Scheduled Monument, Stump Cross, which is sited on the verge of the busy A607 road. The listing includes a 1m boundary around the Cross into the hedgeline. <i>“The Stump Cross south of Frisby on the Wreake is a good example of a medieval standing cross. Situated by the</i></p>	<p><b>NP already updated p60. Dot map inserted.</b></p>	
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		<p>and are included below. No additional reasons are given in the draft NP for the site being special or locally significant and none have been ascertained through research for this report, so no further conditions are included.</p> <p>4.6 Recreational/Educational</p> <p>The NPPF lists recreational value as an example of something that would make a green space special to a local community or hold a local significance. It does not mention educational value, but this could also be a justification for considering a site special or significant.</p>	<p><i>roadside, it is believed to stand near its original position and it illustrates the variety of the functions and forms of this type of monument, which is more often found marking churchyards or markets. Archaeological deposits relating to its construction in this location are likely to survive intact. The cross has been little altered in modern times and has continued in use as a public monument and amenity from the medieval period to the present day.”</i></p> <p><a href="https://historicengland.org.uk/listing/the-list/list-entry/1014513">https://historicengland.org.uk/listing/the-list/list-entry/1014513</a></p> <p>The Leicestershire Round is a District Level footpath, much valued by the immediate community and also by Charity Walkers and those seeking a challenge. The footpath is on an</p>		
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		<p>There is existing recreational use on the site, due to the footpath H46, which allows public access to the scheduled monument, Stump Cross. As the Environmental Inventory states, there is potential for educational use. However, this suggests that there is not at present any educational use of the site.</p> <p>For both uses, the importance is limited by this not being the only option locally, but the recreational use of the footpath across site is meaningful as it is part of the wider network and should be preserved.</p> <p>The footpath route across the site does contribute amenity value to the site and therefore adds to the sites local significance.</p> <p>4.7 Beauty, including Views</p> <p>The NPPF lists beauty as an example of something that would mean a green space is special to a local community or holds a local significance.</p> <p>Beauty is something which is renowned to be very subjective, however views are a key part of this and therefore will be analysed strongly within this section.</p> <p>The beauty of a site is often interlinked with its tranquillity and wildlife. As tranquillity and wildlife are both dealt with under later sub-headings, repetition will be avoided.</p> <p>Views can mean both views from and views of the site, and key views will be considered to help gauge the beauty of this site. These can be seen in</p>		<p>incline in the site requiring some exertion. Health and fitness is an important issue locally and nationally.</p> <p>There are treasured views across the Wreake Valley and village Conservation Area, evidenced by the dot map produced at a Community Engagement Event in March 2016.</p> <p>The photographs presented are not</p>	<p><b>NP update.</b></p>	
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	<p>appendix B.</p> <p>The topography of the site is a key factor in the views of and from the site. As shown repeatedly in appendix B, the characters of the north and south parts of the site are very different. Reference plan 1713.0.3 to see an indication of where the site has been divided for the purposes of this description.</p> <p>Views from and of the northern part of the site are limited and shorter. The mature boundary planting is a key factor in this, along with the contour of the land as it slopes downward as part of the Wreake Valley. Views of and from the south part of the site are much more extended and longer, wider panoramas of the semi-natural landscape are presented. This is due to the south part of the site being very open and almost flat.</p> <p>The site has some beauty, particularly due to its semi-improved land type and partially natural character. However, the long, open views of the south part of the site are the main contributing factor to the sites beauty.</p> <p>4.8 Tranquillity</p> <p>Tranquillity can be defined as being calm or free from disturbance. The Campaign to Protect Rural England (CPRE) has quite extensive information on tranquillity and has compiled the top eight survey responses for what tranquillity is and is not, as below.</p> <p>What tranquillity is: 1. Seeing a natural landscape 2. Hearing birdsong 3. Hearing peace and quiet 4. Seeing natural looking woodland 5. Seeing the stars at night 6. Seeing streams 7. Seeing the sea 8. Hearing natural sounds</p>	<p>considered to be representative. More relevant photographs are included in a new document in Appendix C.</p> <p>The site is considered to have integral beauty by parishioners.</p> <p>Noted.</p>	<p><b>Appendix C to contain a new report “FOTW Areas of Separation and Local Green Spaces”</b></p> <p><b>No change</b></p> <p><b>No change</b></p>	
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	<p>What tranquillity is not: 9. Hearing constant noise from cars, lorries and/or motorbikes 10. Seeing lots of people 11. Seeing urban development 12. Seeing overhead light pollution 13. Hearing lots of people 14. Seeing low flying aircraft 15. Hearing low flying aircraft 16. Seeing power lines</p> <p>This shows further that visual factors or beauty, wildlife and tranquillity are all interlinked.</p> <p>The site can currently be said to give those on the site a view of natural landscape (1), the sound of birdsong (2), a view of the stars at night (5), and natural sounds (8). However, people on the site will also hear the constant noise from cars, lorries and/or motorbikes (9) from Rotherby Lane and the A607, and see the power lines that cross the site (16).</p> <p>The neighbouring site FRIS3, to the east, is designated for housing development and has an existing outline planning application on it at present. Additionally, the site FRIS4, directly to the north, is a reserve housing development site.</p> <p>At least, the proposed development at FRIS3 and its effects on the sites tranquillity should be taken into account, and notionally also housing development at FRIS4. Both will certainly reduce the existing level of tranquillity on the site. Firstly, the potential for seeing the stars at night (5) will be reduced, while seeing overhead light pollution (12) will be increased. Seeing urban development (11) and seeing lots of people (10) may be more extreme descriptions of the effects of neighbouring development than can be expected, but an increase in the people seen and the visibility of the buildings will detract from the overall tranquillity.</p>		<p>The rising landform contains the noise from the road, particularly in the northern section of the field. The power cable and timber pole are small and of low voltage.</p> <p>As above, FRIS 3 and FRIS 4 are not in, or were removed from, the NP as chosen housing sites.</p>	<p><b>No change</b></p> <p><b>No change</b></p>	
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		<p>The site may be currently described as somewhat tranquil at present, but will certainly lose a significant amount of that tranquillity once FRIS3, and potentially also FRIS4, are developed.</p> <p>4.9 History</p> <p>Where the NP Environmental Inventory lists history as one of the criteria, this is been taken to mean historic significance, to correlate with the NPPF. This is a relatively straightforward description, as a historically significant site should have a discernible historic tie, although the level of significance must be evaluated.</p> <p>The sites ridge and furrow remains and the way the fields are divided are the only apparent historic elements of the site.</p> <p>This means the site does have some historic significance. The shape of the site is something that can more easily be preserved than the ridge and furrow land.</p>	<p>In addition to the ridge and furrow features, the area surrounding the Stump Cross is and the ancient road way under the modern A607 has <b>yielded a large number of finds pertaining to several thousand years of history. LCC HER MLE 21395. Roman site and Stump Cross</b> <i>“Metal detecting in 2011-2013 has recovered 56 coins (3 silver, 53 copper alloy), 20 brooches, pieces of 2 copper alloy snake's head bracelets, a nail cleaner, a copper alloy finger ring with a green glass setting and a possible buckle. The majority of the coins are late Roman, the brooches may all be early Roman.”</i></p>	<p><b>No change</b></p>	
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		<p>4.10 Wildlife etc.</p> <p>Richness of wildlife is an example given in the NPPF as something that may make a site special to a local community or give it a local significance.</p> <p>Existing analysis of the wildlife on the site rests mainly on the draft Phase 1 Habitat Survey conducted by Karen Headley of the Leicestershire County Council. There is no link to this survey included in appendix C of this report</p>	<p><b>LCC HER MLE 21396</b>  <b>Possible Bronze Age burial site, Stump Cross, south of Frisby on the Wreake</b>  <i>“Two Bronze Age copper alloy spear fragments and a tip of a blade or axe were found here via metal detecting in 2011/13.”</i></p> <p><b>LCC HER MLE 21397</b> Iron Age sword fitting from near Stump Cross, south of FOTW  <i>“Probable copper alloy sword fitting 50mm long and 31mm wide, an open oval, covered in gold leaf, with V-shapes punched into it.”</i></p> <p>LCC aims to supply the Final Phase 1 survey very soon and a link to this document will then be cited in the NP.  The site is protected in the 1999 MLP as a Site of</p>	<p><b>NP update. Appendix C. Add link or to LCC Phase 1 survey if available.</b></p>	
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	<p>as it is in a draft state and therefore not yet publicly available.</p> <p>The draft Habitat Survey (HS) categories the northern part of the site as semi-improved neutral grassland and the southern part as poor semi-improved grassland. It selects the site which it considers to be in OK condition, along with three individual trees within the hedgerows, as a potential or candidate Local Wildlife Site (LWS) at the parish level.</p> <p>The draft HS also identifies two possible ponds, one next to the north boundary and another near the change in gradient within the site. Neither of these ponds is of a significant size and their quality is debatable.</p> <p>As the draft HS notes, further survey work on the site is necessary in order to establish full ecology information.</p> <p>For the purposes of this report, there is some wildlife value attributed to the site. Although the ponds and semi-improved land have some value, the majority of the wildlife value is attached to the boundary planting, which should be preserved.</p> <p>4.11 Local in character</p> <p>The NPPF conditions include that a site should be local in character to be designated a LGS. This is not visibly considered in the draft NP.</p> <p>As described above, the site has a ridge and furrow land form, relatively mature hedgerows of varying density and height, and boundary trees, which are all seen throughout the area. The topography of the site is both part of the Wreake valley and the plateau to the south.</p>		<p>Ecological or Geological Importance.</p> <p>The recent LCC Phase 1 data was used in the NP as being the most recent appraisal. There are at least five pLWS sites on the site, including several trees and the grassland itself.</p>	<p><b>No change</b></p>	
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		<p>Because of these factors, the site can be considered local in character.</p> <p>4.12 Not an extensive tract of land</p> <p>The NPPF states that a site proposed as being designated a LGS must not be an extensive tract of land. This is not noticeably reflected on in the NP.</p> <p>The site boundary and an indicative line showing the built village area are both shown on plan 1713.0.5. This visually compares the size of the site against the size of the village, and shows that the site is almost a third of the built area of the village. This is a large amount of land to designate as LGS against the edge of the village.</p> <p>Because of the above, this report considers the site to be an extensive tract of land.</p> <p>However, the Environmental Inventory, appendix C of the draft NP, describes proposing at least the northern part of the field as LGS. This would alter the proposals and may require a more in-depth assessment of just the northern part of the site, as this report is about the parcel of land as a whole. However, should only a portion of the site be designated LGS, various elements of this report suggest that the south part of the site is more valuable against the relevant conditions.</p> <p>4.13 Summary &amp; analysis of conditions</p>		<p>The NPPF does not define 'extensive' so it is open to local interpretation. The issue of whether land is 'extensive' is a matter for local determination. There is no specific size identified in the legislation.</p> <p>None of the proposed LGS sites is larger than one parcel of land: they are not extensive tracts of land but they are demonstrably local in character and are close to (proximal) the places where local people live.</p> <p>The area of the site is approx. 7.2 Ha. For comparison, the area covered by the existing Planning Application on FRIS 3, adjacent to the site, is approximately 6.6Ha.</p>	<p><b>No change</b></p>	
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	<p>The first condition of the NPPF is that the site should be “in relatively close proximity to the community it serves”. Section 4.3 shows that this is the case for this site.</p> <p>The second condition for designation as a LGS is that “the green area is demonstrably special to a local community and holds a particular local significance”. This is arguably the most complicated condition to analyse.</p> <p>The site - has definite recreational and amenity value - has some visual beauty in the semi-natural character of the land and boundary planting, with more significant views of and from the south part of the site - has some historical significance in the land and boundaries - is somewhat tranquil in certain ways, with a reduction of this tranquillity being foreseen in the future - does have some wildlife value established, mainly in the boundary planting</p> <p>From this information, the site is not strongly special or significant, but it does have meaningful value at a local level. This value has been identified as mainly in the PROW and the boundary planting. Preservation of these elements may be appropriate.</p> <p>Finally, the third condition is that the green area concerned is local in character and is not an extensive tract of land. Although the site is local in character, it is also an extensive tract of land and therefore does not meet this condition.</p> <p>5.0 Summary and Conclusions</p> <p>In summary, there is some valid reasoning in the draft NP. For example, the</p>		<p>These points are addressed above.</p>	<p><b>No change</b></p>	
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		<p>site is in close proximity to the community and the existing footpath holds important recreational and amenity value.</p> <p>However, as seen in section 4, the site overall does not meet the NPPF requirements and is not worthy of designation as LGS.</p> <p>Taking into account the existing and proposed shape of the village, the existing planting on the west boundary of the site (adjacent to Gated Road) provides a natural position for the west village boundary. As such, it may be important to protect this.</p> <p>Other elements considered potentially worthy of protection or preservation are the footpath H46 and the sites boundary planting.</p> <p>As outlined in section 4.12, designation of the south part of the site as LGS would make more sense than designation of the north part. This is due to it being equally or more valuable in regard to the majority of the evaluation criteria, and particularly as views are longer over the plateau and this is a more sensitive area.</p> <p>With careful design, development on the northern part of this site would have limited landscape or visual impacts.</p>		<p>The hedge row along Rotherby Lane includes some three of the pLWS on the site and it is hoped that the two large ash trees, recently felled here, will regenerate. The grassland is also pLWS. The site is of ecological importance to the parish.</p> <p>FPC disagree entirely with these statements. The environmental features predominantly in the northern two-thirds of the site, as are the ridge and furrow. The wealth of portable archaeological finds were in the vicinity of Stump Cross. The Footpath relates to the entire site. The views relate to the southern (higher) half of</p>	<p><b>No change</b></p>	
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				<p>the field. The southern part of the site is also further from the village. There is value to the community across the site, which is similar in size to the area of an existing planning proposal.</p> <p>FPC has arranged to meet with the landowner to discuss which should be adopted as the southern boundary of the site.</p>		
6.	<p>Policy ENV2: Protection of other sites of environmental (natural and historic) significance</p>	<p>5.1 Richborough Estates would also like to raise their concerns with Policy ENV 2 which seeks to afford 37 sites in the Neighbourhood Plan area a certain level of protection on the grounds of their natural and/ or historic significance.</p> <p>5.2 The draft NP identifies ‘Local Green Spaces’ (which it seeks to protect under proposed Policy ENV1), ‘Other Important Open Spaces’ (which it seeks to protect under Community Action CAENV1), ‘Important Woodland, trees and hedges’ (which it seeks to protect under Policy ENV3), and ‘Important Views’ (which it seeks to protect under Policy ENV 6). We are not clear then what the justification, or indeed the purpose of Policy ENV2 is which goes on to identify a further 37 sites ‘as being of local significance for wildlife and/or history’ and states that ‘development proposals that affect them will be expected to protect or enhance the identified features’.</p>	Richborough Estates			<p><b>Developer on behalf of a resident landowner</b></p>



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		<p>5.3 The policy refers to the Environmental Inventory in Appendix C which assesses the identified sites against Local Green Space Criteria in the NPPF. The 'other sites of environmental significance' identified in Policy ENV2 appear to be those which did not meet the criteria for 'Local Green Space' or 'Other Important Open Spaces'.</p> <p>5.4 To highlight our questions around the justification of the Policy, we refer to site number 018 which is adjacent to land off Great Lane. The Environmental Inventory in Appendix C refers to this as being a large field of horse-grazed grassland. It refers to 'frequent herbs in grass and tall hedges with ash, field maple and other trees' but also states 'awaiting further habitat survey'. There appears no evidence then to suggest that site 018 is</p>	<p>5.3 Policy ENV2 deals with sites of demonstrable environmental (wildlife and/or history) significance in the parish that do not meet NPPF social/community criteria for designation as LGS. Their wildlife / history value is a fact, supported by the evidence presented in Appendix C. It should be noted that these sites are not proposed for statutory protection (as are the LGSs), but recognised so that the value of features they exhibit will be taken into account by the Planning system in the event of a Development proposal being submitted.</p> <p>5.4 &amp; 5.5 Ridge and furrow is a feature of historical significance; it is also covered by ENV5 as a non-designated heritage asset, using policy wording</p>	<p>No change</p> <p><b>No change</b></p>	
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		<p>of particular value for flora and fauna which would require additional protection beyond that already provided in draft NP Policy EN4 (Biodiversity). Appendix C also refers to ridge and furrow being present on the site but again this would already be afforded a level of protection in draft NP Policy ENV5 (Ridge and Furrow Fields).</p> <p>5.5 As such, there is no clear justification why site 018 is identified as particularly worthy of protection under Policy ENV2. Consequently, it is unknown what ‘identified features’ any development proposals would be expected to ‘protect or enhance’ as required by the Policy.</p> <p>5.6 Overall, it is considered that there are other policies in the draft NP (and local and national policy) which would provide sufficient protection of significant environmental or heritage assets and draft policy ENV2 is unjustified and unnecessary and should be deleted.</p>	<p>supported by Historic England. The eastern part of the parish is designated SHINE (Selected Heritage Inventory for Natural England) by Natural England for the quality of the historic landscape features, including the ridge and furrow. The Great Lane development site is also part of that SHINE designation and that section is now lost to the village. Site 018 additionally has features of wildlife significance as judged by the LCC Ecology team; these would not be drawn to the LPA’s attention if the site’s only designation in the Plan was for the Ridge and Furrow.</p> <p>5.6 Policy ENV 2 is supported by NPPF paragraphs 109, 117, 118, 128, 129, 135 and 140. Its intention is to ensure that the community of Frisby on</p>	<p><b>No change</b></p>	
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				the Wreake makes a meaningful contribution to the protection of heritage assets and biodiversity at the local scale.		
7.	Figure 18, p48 & Figure 20, p51	The plans are too small to be able accurately identify the areas of land being referred to. A detailed plan which can be enlarged clearly on an electronic device should have been provided.	Rebecca Hayward	Noted NP updated	<b>NP updated with amended Fig 18 and Fig 20</b>	<b>*Non Resident Landowner</b>
8.	POLICY ENV 1: PROTECTION OF LOCAL GREEN SPACES POLICY ENV 2: PROTECTION OF OTHER SITES OF ENVIRONMENTAL (NATURAL AND HISTORICAL) SIGNIFICANCE	1.The landowners do not support the designation of sites 16 and 17 under POLICY ENV 1: protection of local green spaces, nor the identification of site 18 under POLICY ENV2: protection of other sites of environmental (natural and historical) significance as it places significant constraints on the land use, and is likely to significantly reduce its open market value. Given the Parish Council's obligations as a public body under the Human Rights Acts 1998, it would have been strongly advisable to consult the land-owners prior to designation given the significant constraint on the development rights and use of the land, not only to ensure that the designation was viable, but a more compelling argument would be that it meets the above Human Rights obligations.	Rebecca Hayward	1. Policy ENV1 provides statutory protection for designated Local Green Space <i>other than in exceptional circumstances</i> and is thus in conformance with the NPPF. Policy ENV2 deals with sites of demonstrable environmental (wildlife and/or history) significance in the parish that do not meet NPPF social/community criteria for designation as LGS. Their wildlife / history value is a fact, supported by the evidence presented in Appendix C It should be noted that	<b>No change</b>	<b>*Non Resident Landowner</b>

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	<p>POLICY ENV5: RIDGE AND FURROW FIELDS</p>	<p>2. Additionally, POLICY ENV 1 should be used to protect areas of green space <u>within the village that are local in character</u> and <b>not be used to target extensive tracts of land in the open countryside outside the village which is contrary to the National Planning Policy Framework (NPPF)</b>. The application of POLICY ENV1 and POLICY ENV2, to sites 16, 17 and 18 is deemed to be <b>Inappropriate Use of Neighbourhood plan to block potential future development</b> as set out in Section 1.4 of the Leicester and Leicestershire Neighbourhood Planning Toolkit which specifically states that</p>	<p>these sites are not proposed for statutory protection (as are the LGSs), but noted so that the value of features they exhibit will be taken into account by the Planning system in the event of a Development proposal being submitted.</p> <p>Furthermore, the landowners ARE being consulted prior to designation. It is inappropriate to consult prior to assessments being undertaken and proposed designations confirmed. No human rights violations have taken place.</p> <p>2. Local Green Spaces designations are not limited in the NPPF to sites ‘within [the] village’; the relevant criterion is ‘proximity’. None of the proposed LGS sites is larger than one parcel of land and</p>	<p><b>No change</b></p>	
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		<p>“A Neighbourhood Plan<sup>1</sup> CANNOT be used to... <b>Prevent any development from ever taking place in an area or Be used to block development</b>”.</p> <p>POLICY ENV5 should be removed from the plan as it is potentially harmful to landowners and can have a significant adverse impact on land use and subsequent land value and again consideration must be given to the Parish Council's obligations as a public body under the Human Rights Acts 1998 .</p> <p>Ridge and Furrow (figure 23), are non-designated heritage assets and FOTW NPC are using this policy to circumvent this current situation by placing additional significance on the feature as heritage assets.</p>	<p>are generally similar in size to local Planning Applications: they are not extensive tracts of land but they are demonstrably local in character and are close to (proximal) the places where local people live.</p> <p>Local Green Space designation, as defined in the NPPF, provides statutory protection of eligible sites against development (other than in exceptional circumstances). The FOTW Neighbourhood Plan, taken as a whole, does not aim to prevent all development (as the allocation of sufficient sites for development to meet the housing number target demonstrates); the purpose is to protect the environment of FOTW by</p>		
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<sup>1</sup> Extract from Leicester and Leicestershire Neighbourhood Planning Toolkit, section 1.4 p.6

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	<p>POLICY ENV 6: PROTECTION OF IMPORTANT VIEWS</p>	<p>3. POLICY ENV 6: This policy should be removed as it is not the role of the NP to designate areas of LGS based on views of the countryside. The 5 areas identified by FOTW NPC are in a countryside location on the outskirts of the village, projecting into the wider countryside. As such, the character of the site is as part of the surrounding countryside, rather than local in character. A precedent for such cases has been established by an independent examiners report on Chapel-en-le-Frith Neighbourhood Development Plan<sup>2</sup> 2013-2028 where it states <i>“It is not the purpose of the Local Green Space designations to include countryside land that provides wider views of the countryside. In my view, the site is a large area which projects into the open countryside and is part of the wider countryside rather than local in character”</i>. Specific objection to the inclusion under this policy of <b>area C</b>, North, East and west from Mill Lane fields, is detailed below.</p>	<p>proposing development on (deliverable) sites of relatively low environmental significance in the parish. This is the crux of sustainable development, and is the primary function of a Neighbourhood Plan.</p> <p>3. The criteria for Local Green Space eligibility include ‘special to the community’, ‘beauty’ and ‘access’. In FOTW, residents consider retention of and access to viewpoints, and the quality of views both within and from a site, to be key indicators of these criteria. The proposed LGSs in FOTW are not ‘large areas’ and do not include ‘countryside land’ beyond their mapped boundaries;</p>	<p><b>No change</b></p>	
	<p>POLICY ENV9: AREAS OF SEPARATION</p>				

<sup>2</sup> Chapel-en-le-Frith Neighbourhood Development Plan 2013-2028, Report by Independent Examiner Janet L Cheesley BA (Hons) DipTP MRTPI, CHEC Planning Ltd, January 2015

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		<p>4. The River Wreake, the flooded gravel pits and the railway line provide a clear line of separation from Asfordby as such the proposal to include land directly to the South of Mill Lane extension, including site 22 and 18, as an area of separation is unnecessary and conflicts with the recommendations of Melton Borough Council, as reported in Melton Borough Areas of Separation, Settlement Fringe Sensitivity and Local Green Space Study (2015)<sup>3</sup> the relevant section is quoted below:  “4.104 This Area of Separation is identified and considered in paragraphs 4.49 to 4.52 above.  4.105 The recommendation for this AOS is Not required.  4.106 The area was identified through the Issues and Options (2015) consultation. Although the area is sensitive in parts to development, it is considered that the sense of separation would be maintained by existing landscape features and constraints. <b>It is not necessary to designate this area.”</b>  Implementation of this policy against MBC recommendations is clear evidence of <b>Inappropriate Use of Neighbourhood plan to block potential future development</b></p>	<p>however development of these sites would make appreciation of the noted views impossible.  4. The flooded gravel pits (now a Nature Reserve) are situated to the north of the parish, and there is only open countryside beyond. The railway line does offer a line of separation from Asfordby, but the FOTW LTD does extend beyond the track and there is vehicular access across the track in two places on Mill Lane. Asfordby LTD now extends to the parish boundary on the river and there is only approximately 600m distance between the two villages here and only 775m from ‘Owl End’ on the corner of Mill Lane (well within FOTW LTD). Despite this, the AoS have been reduced in size.</p>	<p><b>NP updated p64-65. Areas of Separation have been changed.</b></p>	
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<sup>3</sup> Melton Borough Areas of Separation, Settlement Fringe Sensitivity and Local Green Space Study (2015) 4.104, 4.105 & 4.106

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	<p>COMMUNITY ACTION CAENV 1: OTHER IMPORTANT OPEN SPACE</p>	<p>5.The blanket designation of rural open space outside the village rather than the designation of local sites within the village as LGS, such as sites in blue on p.49 of the NP, seems to be contrary to the purpose of LGS designation. The draft NP states that these sites in blue are “classed as important open spaces although the Neighbourhood Planning Group have not scored them highly enough, using NPPF criteria as applied in this Plan, for Local Green Space designation”. They further describe these sites as being a ‘vital part of the special and rural character of the settlement of Frisby on the Wreake and merit consideration for protection and enhancement’<sup>4</sup>.</p> <p>6. It should be noted that sites 60 and 64 are both important recreational sites where children play, dogs are walked or as in the case of site 64, people can sit on a bench and relax, yet both sites have scored lower than site 16 regarding tranquillity and recreational/educational. Also the village cricket ground, site 44 should surely be designated as a LGS. As a resident of the village I would wholeheartedly support LGS designation for these pockets of land as they are an integral part of the character and beauty of the village and therefore hold special interest. The exclusion of these small local sites within the village and the focus on designating surrounding fields as LGS would seem to further support the argument that the NP is being used to block potential future development.</p>	<p>5. The sites mapped for Community Action ENV 1 are not proposed as Local Green Space so are not intended for statutory protection.</p> <p>6. We welcome these suggestions of further sites within the built-up area for consideration as LGS. However, sites 60 and 64 are very small roadside greens which are neither large enough nor suitable for play. Site 60 is at the turning head of the cul-de-sac, site 64 is where three residential roads meet. Both are designated Important Open Space within the Draft NP. The cricket field, site 44, is</p>	<p><b>No change</b></p> <p><b>No change</b></p>	
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<sup>4</sup> Draft NP page 50



## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

				not within the village. It does score highly (23/32) in the Inventory but does not reach the required minimum score of 24 and therefore does not qualify to be designated LGS.		
		<p><b>Detailed comments and objections to the draft NP are summarised below.</b>  It should be noted that the following policies all have significant and adverse implications for the landowner of sites 15, 16, 17, 18 and 22, a large area of fields located to the East of the village and North of the proposed new development site on Great Lane. Should these policies be allowed to be implemented this will have devastating implications for the landowner, in terms of future land use, whether that be agricultural, investment or development. Given the Parish Council's obligations as a public body under the Human Rights Acts 1998, serious consideration should have taken as to the effect these actions will have on the landowner given the significant constraint on the potential use and development rights of the land.</p> <p>POLICY ENV 1: PROTECTION OF LOCAL GREEN SPACES – affects sites 16 and 17.  POLICY ENV 2: PROTECTION OF OTHER SITES OF ENVIRONMENTAL (NATURAL AND HISTORICAL) SIGNIFICANCE – affects Site 18.  POLICY ENV5: RIDGE AND FURROW FIELDS – affects sites 15, 16, 17, 18 and 22.  POLICY ENV 6 PROTECTION OF IMPORTANT VIEWS – affects sites  POLICY ENV9: AREAS OF SEPARATION – affects sites 22 and 18.  In addition to the objections cited above I am objecting to the above policies and the designation/inclusion of these sites of the following grounds</p> <p>1) Inappropriate Use of Neighbourhood plan to block potential future</p>		<p>The impact on the landowner of the potential LGS designation is not a consideration in determining the special features of the land. The landowner has had this opportunity to comment on the proposed designation so human rights issues have been addressed.</p> <p>The designations have been proposed on the basis of the features of the land and not as a means of blocking development. The NPPF does not define 'extensive' so it is open to local interpretation.</p>	<p><b>No change</b></p> <p><b>No change</b></p>	

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>development</p> <p>I am objecting to the designation of sites 16, 17 as Local Green Space (LGS) under POLICY ENV1, and the designation of site 18 under POLICY ENV2 on the following grounds:</p> <ul style="list-style-type: none"> <li>2) Extensive Tracts of Land being designated as LGS is contrary to the National Planning Policy Framework (NPPF)</li>   <li>3) Sites 16, 17 and 18 are not demonstrably special or of particular local significance to the local community and the narrative and scores relating to sites 16, 17 and 18 are inaccurate and extremely subjective. Full objections are detailed under section 3 below. <ul style="list-style-type: none"> <li>a. Site 17 has no public access, so it offers no recreational value, beauty or tranquillity. There is no particular richness of wildlife and apart from a poor example of ridge and furrow, which in itself is a common feature in Leicestershire, has nothing of historic significance.</li>   <li>b. Site 16 contains a local footpath, similar to many in the area, there is no additional recreational value as access outside the footpath is trespass, there is no particular richness of wildlife, beauty or tranquillity as dogs are walked along the footpath and horses are grazed year round. And the recorded heritage site, which is of poor quality and of limited interest, has been partly demolished with the</li> </ul> </li> </ul>		<p>*Please find detailed response below</p> <p>LGS sites do not require public access to be classified as being ‘special’. The Independent Examiner for the Hungarton NP determined that ‘... a potential site does not have to meet all the suggested attributes for being special; one strong attribute is enough.’</p> <p>*Please find detailed response below</p>	<p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>remaining part on private land and not accessible to the public.</p> <p>c. Site 18 contains a local footpath, similar to many in the area, there is no additional recreational value as access outside the footpath is trespass, there is no particular richness of wildlife, beauty or tranquillity as dogs are walked along the footpath and horses are grazed year round.</p> <p>4) Additionally, I am objecting to the consultation process itself on the basis that it is fundamentally flawed for the following reasons:</p> <p>a. Key consultation documents were changed over half way through the consultation period, and without publicising the change.</p>	<p>*Please find detailed response below</p> <p>NPAC acknowledge that copy-editing errors appeared in the scoring of two fields in Appendix C and are grateful that you brought it to our attention. The publisher had ‘copy and pasted’ the scores for the preceding field in each case, thereby making the LGS fields appear to have a much lower score (that wouldn’t qualify for LGS). The original working document (unchanged since 16<sup>th</sup> Nov 2016) was uploaded to the website within 24 hours of you pointing the errors out to us, and all LGS landowners were immediately told.</p>	<p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p><b>1) <u>Inappropriate Use of the Neighbourhood Plan to block potential future development</u></b></p> <p>Section 1.4 of the Leicester and Leicestershire Neighbourhood Planning Toolkit specifically states that “A Neighbourhood Plan<sup>7</sup> CANNOT be used to... <b>Prevent any development from ever taking place in an area or Be used to block development</b>”. The selection of sites 17 and 16 is a clear attempt to block future housing development growth in the area. Site 17, a small site, borders the pending new development of 48 houses on Great Lane and site 16 adjoins this. Local Green Space is a restrictive and significant policy designation equivalent to Green Belt designation and the landowners feel that this is unjustified, particularly as development has been approved on the adjoining parcel of land.</p> <p>Section 1.4<sup>8</sup> of the ‘Green Spaces in Leicester And Leicestershire: Local Green Spaces Toolkit And Existing Policy Context’ clearly states that ‘<i>Land ownership is an important consideration in designating Local Green Spaces.</i> As with other site specific allocations in Plans the owners of sites should be involved from an early stage to <b>ensure the owner’s support for the designation. This is to make sure that the designation is viable</b>’. There is no support from the landowners for the designation.</p>	<p>days).</p> <p>The FOTW NP is NOT being used to block development – it makes provision for the number of new homes required through the draft Local Plan.</p> <p>Paragraph 76 of the NPPF says ‘Local communities through local and neighbourhood plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances’. The NP is therefore in conformity</p>	<p><b>No change</b></p>	
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<sup>7</sup> Extract from Leicester and Leicestershire Neighbourhood Planning Toolkit, section 1.4 p.6

<sup>8</sup> GREEN SPACES IN LEICESTER AND LEICESTERSHIRE: LOCAL GREEN SPACES TOOLKIT AND EXISTING POLICY CONTEXT, p9

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p><b>2) Extensive Tracts of Land being designated as LGS</b></p> <p>Designation of site 16 and 17 are contrary to NPPF guidance as site 16 individually, and when combined with site 17, could reasonably be classed as an extensive tract of land. Site 16 comprises 3.33ha and when combined with Site 17 (0.78ha) gives a total area of 4.11ha.</p> <p>The National Planning Policy Framework (NPPF) states:<sup>9</sup></p> <p>“The Local Green Space designation will not be appropriate for most green areas or open space. The designation should only be used: ● where the green space is in reasonably close proximity to the community it serves; ● where the green area is demonstrably special to a local community and</p>	<p>with national policy in proposing the designation of special LGS within the Parish.</p> <p>Furthermore, MBC described the Wymondham and Edmondthorpe NP as being ‘at an early stage’ when at Regulation 14.</p> <p>There is no legislative requirement to obtain a landowners’ approval for LGS designation.</p> <p>The issue of whether land is ‘extensive’ is a matter for local determination. There is no specific size identified in the legislation.</p>	<p><b>No change</b></p>	
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<sup>9</sup> Paragraph 77 of the NPPF

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and ● where the green area concerned is local in character and is <u>not an extensive tract of land</u>".</p> <p>The designation of sites 16 and 17 is inappropriate as these two sites combined could reasonably be classed as an extensive tract of land, site 16 alone is a large field and could reasonably considered thus without the inclusion of site 17. Similarly, Site 01 can also reasonably be classed as an extensive tract of land. Extensive is not, as far as I am aware, legally defined, so it seems that a site that area-wise covers an area almost 1/3<sup>rd</sup> the size of the nearby community would reasonable be considered large. Designating any large tract of land would breach Section 1.4 of the Leicester and Leicestershire Neighbourhood Planning Toolkit and contravene the guidance on p8 of the document Green Spaces In Leicester And Leicestershire: Local Green Spaces Toolkit And Existing Policy Context .</p> <p>Leicestershire County Council guidance on green spaces<sup>10</sup> (page 8) also advises that <i>"The NPPF states a designated Local Green Space should be "local in character" and "not an extensive tract of land", in other words it should be small rather than large. "</i> Sites 16 and 17 are areas of open countryside or farmland and as such reflect the characteristics of the surrounding countryside rather than being local in character. Planning Practice Guidance (PPG)<sup>11</sup> regarding local green spaces provides further guidance, stating that: <i>"...blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, 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> (paragraph: 015 Reference ID: 37-</p>		<p>This is not a blanket designation of open countryside but rather part of an assessed</p>	<p><b>No change</b></p>	
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<sup>10</sup> GREEN SPACES IN LEICESTER AND LEICESTERSHIRE: LOCAL GREEN SPACES TOOLKIT AND EXISTING POLICY CONTEXT p8

<sup>11</sup> <https://www.gov.uk/guidance/open-space-sports-and-recreation-facilities-public-rights-of-way-and-local-green-space>

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	<p>015-20140306)</p> <p>The blanket designation of rural open space outside the village rather than the designation of local sites within the village as LGS, such as sites in blue on p.49 of the NP, seems to be contrary to the purpose of LGS designation. The draft NP states that these sites in blue are “classed as important open spaces although the Neighbourhood Planning Group have not scored them highly enough, using NPPF criteria as applied in this Plan, for Local Green Space designation”. They further describe these sites as being a ‘vital part of the special and rural character of the settlement of Frisby on the Wreake and merit consideration for protection and enhancement’<sup>12</sup>. It should be noted that sites 60 and 64 are both important recreational sites where children play, dogs are walked or as in the case of site 64, people can sit on a bench and relax, yet both sites have scored lower than site 16 regarding tranquillity and recreational/educational. Also the village cricket ground, site 44 should surely be designated as a LGS. As a resident of the village I would wholeheartedly support LGS designation for these pockets of land as they are an integral part of the character and beauty of the village and therefore hold special interest. The exclusion of these small local sites within the village and the focus on designating surrounding fields as LGS would seem to further support my argument that the NP is being used to block potential future development.</p> <p><b>3) <u>Opposition to the LGS designation and specifically sites 16 and 17</u></b></p> <p>The National Planning Policy Framework (NPPF) states:<sup>13</sup>          “The Local Green Space designation will not be appropriate for most green</p>	<p>identification of what is considered special by the community.</p> <p>*Please see detailed response below</p>		
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<sup>12</sup> Draft NP page 50

<sup>13</sup> Paragraph 77 of the NPPF



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		<p>areas or open space. The designation should only be used: <b>where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife</b>".</p> <p>The seemingly arbitrary and inconsistent use of scores, particularly wildlife scores, across sites brings into question the integrity and robustness of the LGS scoring system. Sites 16, 17 and 18 have all scored significantly higher than comparable tracts of adjoining land, notably sites 15, 19 and 22 all of which have scored significantly lower. The pending new development site off Great Lane shares the same topography and landscape characteristics as sites, 16, 17 and 18. The assessment of the Great Lane development site states<sup>14</sup> <i>'There are no known protected species on the site.....from the biodiversity study the site has been identified to be of low ecological value'</i>. However the LGS assessment for site 16 and 17 has scored wildlife etc 3, and when compared to neighbouring site 19, which scored just 1, a score of 3 is felt to be unrealistic and unjustifiable. All three sites 16, 17 and 18 are horse grazed grassland and much of the re-growth is predominantly weed species, all three sites suffer with large patches of weed species, nettles and thistles, which as far I can ascertain are not classed as having any particular significance or positive impact on the environment or wildlife. As I have been unable to obtain a copy of the scoring descriptors used by FOTW NPC I have been disadvantaged as I am not in full possession of key information pertaining to the scoring methodology applied, in particular, how FOTW NPC have interpreted it.</p>				
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<sup>14</sup> Draft NP Plan appendix F, page 12

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p><b>SITE 16</b> Extract below taken from p4 of revised appendix C.</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr style="background-color: #c8e6c9;"> <th colspan="10" style="text-align: center;">SITE 16 – PROPOSED LGS AS DESIGNATED BY FOTW NPG</th> </tr> <tr style="background-color: #e0e0e0;"> <th colspan="10" style="text-align: center;">NPPF 2012 Local Green Space (LGS) Criteria (score ranges as shown)</th> </tr> <tr> <th style="text-align: center;">Access 0-4</th> <th style="text-align: center;">Proxim. 0-4</th> <th style="text-align: center;">Bounded 0-4</th> <th style="text-align: center;">Special 0-4</th> <th style="text-align: center;">Rec/Edu. 0-4</th> <th style="text-align: center;">Beauty (inc views) 0-2</th> <th style="text-align: center;">Tranq. 0-2</th> <th style="text-align: center;">History 0-4</th> <th style="text-align: center;">Wildlife etc. 0-4</th> <th style="text-align: center;">Total Score 32</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">3</td> <td style="text-align: center;">3</td> <td style="text-align: center;">4</td> <td style="text-align: center;">4</td> <td style="text-align: center;">3</td> <td style="text-align: center;">2</td> <td style="text-align: center;">2</td> <td style="text-align: center;">3</td> <td style="text-align: center;">3</td> <td style="text-align: center;">27</td> </tr> </tbody> </table> <p>Large field, horse-grazed grassland. Favoured footpath to <u>Asfordby</u> and Kirby <u>Bellars</u>. More informal access and used for sledging in snow. Mill Lane gardens to west, Mill Lane to north. Hedges and a number of mature trees to four sides, mostly ash, some hollow, deadwood in canopy and girth 3m, <u>One</u> of these is massive and beautiful. Phase 1 survey suggests two <u>pLWS</u>. Rising ground, view from top to north treasured by public, view from bottom to southwest edge of village treasured by community. Deep ridge and furrow, other archaeology in HER. Part of designated Shine DLE8012. Location of medieval village earthworks MLE3740 in HER. Other <u>HEI Findspots</u> in adjacent Mill Lane gardens support the ancient relevance of this area to the historical origins of the village. Awaiting further habitat survey.</p> <p><b><u>Objections and Response Objections and to Score</u></b></p> <p><u>Access</u> There is a footpath through the site and for parity with other footpath sites the score should be 2. The claim that there is informal access to the site is inaccurate, the landowners have never given consent for access over and above use of the footpath, access to the wider site is considered trespass.</p> <p><u>Bounded</u> The site is not bounded on all sides by hedgerows. The site is bounded on the East by farm buildings and gardens of adjoining properties. The</p>	SITE 16 – PROPOSED LGS AS DESIGNATED BY FOTW NPG										NPPF 2012 Local Green Space (LGS) Criteria (score ranges as shown)										Access 0-4	Proxim. 0-4	Bounded 0-4	Special 0-4	Rec/Edu. 0-4	Beauty (inc views) 0-2	Tranq. 0-2	History 0-4	Wildlife etc. 0-4	Total Score 32	3	3	4	4	3	2	2	3	3	27	<p><b>*Detailed response</b></p> <p>The Environmental Inventory included results from community events, field scores therefore include local knowledge and experience. The late Mrs Hayward allowed people to enjoy her land more broadly than strictly by use of the footpath. Hence, access is 3.</p> <p>The field is bound on all</p>	<p><b>No change</b></p> <p><b>No change</b></p>	
SITE 16 – PROPOSED LGS AS DESIGNATED BY FOTW NPG																																												
NPPF 2012 Local Green Space (LGS) Criteria (score ranges as shown)																																												
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3	3	4	4	3	2	2	3	3	27																																			

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	<p>Northern boundary is relatively open to Mill Lane below and bounded by aging wooden fences rather than trees or hedgerows. The score should therefore be reduced to 3 for this aspect.</p> <p><u>Recreational/Educational</u> As previously stated there is no access to the wider site apart from the footpath, so any recreational activities other than walking the footpath would be classed as trespass. For parity with similar adjoining footpath sites the score should be reduced to 2.</p> <p><u>Beauty (inc views) and Tranquility</u> The landscape of this site is comparable with the adjoining sites 15, 17, 22 and 18. The trees are Ash, which are especially common in the area and many are now hollow with much deadwood. The claim that the <i>'view from top to north treasured by public, view from bottom to southwest edge of village treasured by community'</i>, is extremely subjective. As mentioned previously the only access is via use of the public footpath, the public footpath does not extend to the top (south) of the site, nor to the bottom (north) of the side, so whilst there are some views they are not particularly special. The highest ground level of the Frisby-Kirby/Asfordby footpath at any point is on the adjoining site, Site 15, as the footpath enters site 16 the ground declines sharply so views along the footpath are visibly reduced as one enters site 16 and further reduced into site 18 as the footpath is situated in a dip. As the community are therefore unable to enjoy any views from the top or the bottom of this field as this is outside the scope of the footpath it must be questioned how these views can be treasured. The site is in a countryside location on the outskirts of the settlement,</p>	<p>sides and scores 4, the nature of the boundary may vary as may the quality and density of the hedgerows.</p> <p>The slope of the field and the pronounced ridge and furrow provides opportunity for exercise, history and nature at once as the footpath is routed diagonally across the field.</p> <p>The trees include two pLWS ash trees in fields 16 and 17, the presence of deadwood in the canopy is an indicator of ecological value. The views are present from the footpaths, include looking back towards the village and are evidenced by the dot map produced during a Community Engagement event in March 2016 and referenced in MLP evidence base (Fringe</p>	<p><b>No change</b></p> <p><b>NP p64 already updated to include dot map from March 2016 Community event</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>projecting into the wider countryside. As such, the character of the site is as part of the surrounding countryside, rather than local in character. Whilst there is public access along the footpaths, and these footpaths appear to be well used by the local community, there are very many areas of similar countryside in close proximity to the village where footpaths allow public access and thus this site cannot be considered demonstrably special. A precedent for such cases has been established by an independent examiners report on Chapel-en-le-Frith Neighbourhood Development Plan 2013-2028<sup>15</sup> where it states <i>“It is not the purpose of the Local Green Space designations to include countryside land that provides wider views of the countryside. In my view, the site is a large area which projects into the open countryside and is part of the wider countryside rather than local in character”</i>.</p>	<p>Sensitivity study reference below). The footpaths also used by a wider community and are part of AA route ‘Villages of the Wreake’ and LCC Parish Walks series amongst others. The Draft MLP Areas of Separation, Settlement Fringe Sensitivity and Local Green Space Study Final report 2015 section 4.111 p143 states that <i>“Development [FRIS 1] should seek to achieve a gradation of development density to the outer edges, linked with new green space provision and the historic landscape.”</i> And <i>“Features such as ridge and furrow field systems would be best conserved, enhanced and interpreted as part of a green</i></p>		
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<sup>15</sup> Chapel-en-le-Frith Neighbourhood Development Plan 2013-2028, Report by Independent Examiner Janet L Cheesley BA (Hons) DipTP MRTPI, CHEC Planning Ltd, January 2015

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>Tranquillity is limited as the site contains a footpath which is used by dog walkers, usually off lead, also the presence of horses, often up to 30 in the summer, means that tranquillity is seriously compromised. For these reasons beauty should be reduced to 2 and tranquillity to 1.</p> <p><u>History</u> The recorded heritage site, MLE3740, located on private land, and therefore inaccessible to the public, to the West side of site 16 is of poor quality and of limited interest. I have been advised by the Historic Environment Record Officer at Leicestershire County Council that very little information about this site is held on the Leicestershire and Rutland Heritage Gateway and there is no record of any finds. The site consists of low earthworks in the shape of a square platform, any features located around the site or further North have been partly demolished or obscured with the dumping of topsoil directly onto the site and from soil erosion due to horses being present. Regarding the ridge and furrow, as this is common throughout Leicestershire and not a protected feature, it has relatively low importance. In email correspondence from the Historic Environment Record Officer at Leicestershire County Council it was stated that “<i>DLE references are indeed for the medieval ridge and furrow (DLE8011) (DLE8012), though these aren’t relevant to anything other than Countryside Stewardship (farming) schemes</i>”. I would therefore question why they are being used as the basis for scoring LGS in Local Neighbourhood Plans. The ridge and furrow only covers half of the field, and does not extend to the North or West of the site. To better reflect the relatively low importance and accessibility of the recorded heritage site and to take into account that half the site has no ridge and furrow, the score should be reduced to 2.</p>		<p><i>infrastructure network.”</i></p> <p>The presence of horses and dog walkers does not impinge on tranquillity.</p> <p>See recommendations in the Draft MLP Fringe Sensitivity Study referenced above, SHINE LE8012 (Natural England) ascribes ‘<i>High significance</i>’ to an area of medieval ridge and furrow and medieval village earthworks east of FOTW. This includes the rectangular house platform and ridge and furrow across and beyond fields 16, 17, 18 and 22. These earthworks are well-defined, wide and have a reverse-S shape characteristic of earthworks of medieval date. Whilst Frisby was not</p>	<p><b>No change</b></p> <p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p><u>Wildlife</u> Neighbouring sites have scored 1-2, so for parity the score here should also be less than 3. The pending new development site off Great Lane borders site 17 and site 18 and shares the same topography, landscape and wildlife characteristics. The recent wildlife/ecology assessment of the Great Lane development site states<sup>16</sup> <i>'There are no known protected species on the site.....from the biodiversity study the site has been identified to be of low ecological value'</i>. The score for this aspect should therefore be reduced to 2.</p>	<p>selected to be one of the few priority townships, the ridge and furrow is important to local landscape character and village setting, relating the whole village to its past. Whilst DLE designations are used in Countryside Stewardship schemes, they do, nonetheless, demonstrate historical value.</p> <p>The FRIS 1 development site is classed as 'Poor semi-improved grassland' in the LCC Phase 1 survey. The presence of bats foraging and, perhaps, roosting in the hedgerows was also noted. It does have ecologically valuable hedgerows and trees. The grassland in your fields is labelled 'SI/SNG?' and is</p>	<p><b>No change</b></p>	
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<sup>16</sup> Draft NP Plan appendix F, page 12

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p><u>Special</u>          Aside from the fact that a footpath runs through the site, there is limited recreational or educational value and tranquillity is limited due to dogs running around off lead. The site is of low ecological value and therefore has limited wildlife, and any wildlife present would likely also inhabit neighbouring sites. The ridge and furrow is limited to the South Eastern half of the site and the recorded heritage site is limited in scope and likely to be of little significance. the score for special should be reduced accordingly from 4 to 2 on a par with sites 18, 19 and 22.</p>	<p>awaiting further survey by LCC Ecology later in 2017. The hedgerows and trees in the site include two pLWS and are as, or more, valuable to wildlife than those in FRIS 1.</p> <p>Families have sledged in the snow in field 16 behind the farmhouse for over forty years, and in substantial numbers. In summer, the natural history/nature watching and history observation of high quality medieval ridge and furrow provides practical social and economic history for primary children, and is excellent exercise walking/running over the large banks and troughs. Many people view these to be beautiful fields. NPAC does not agree with your scoring of this field and upholds the score in the NP.</p>	<p><b>No change</b></p>																																										
		<table border="1"> <thead> <tr> <th colspan="10">SITE 16 – SUGGESTED REVISED SCORING FOR LGS ASSESSMENT</th> </tr> <tr> <th colspan="10">NPPF 2012 Local Green Space (LGS) Criteria (score ranges as shown)</th> </tr> <tr> <th>Access 0-4</th> <th><del>Proxim.</del> 0-4</th> <th>Bounded 0-4</th> <th>Special 0-4</th> <th>Rec/Edu. 0-4</th> <th>Beauty (inc. views) 0-2</th> <th><del>Tranq.</del> 0-2</th> <th>History 0-4</th> <th><del>Wildlife etc.</del> 0-4</th> <th>Total Score 32</th> </tr> </thead> <tbody> <tr> <td><b>2</b></td> <td><b>3</b></td> <td><b>3</b></td> <td><b>2</b></td> <td><b>2</b></td> <td><b>2</b></td> <td><b>1</b></td> <td><b>2</b></td> <td><b>1</b></td> <td><b>18</b></td> </tr> </tbody> </table>	SITE 16 – SUGGESTED REVISED SCORING FOR LGS ASSESSMENT										NPPF 2012 Local Green Space (LGS) Criteria (score ranges as shown)										Access 0-4	<del>Proxim.</del> 0-4	Bounded 0-4	Special 0-4	Rec/Edu. 0-4	Beauty (inc. views) 0-2	<del>Tranq.</del> 0-2	History 0-4	<del>Wildlife etc.</del> 0-4	Total Score 32	<b>2</b>	<b>3</b>	<b>3</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>18</b>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p><b>SITE 17</b> Extract below taken from p4 of revised appendix C.</p> <p style="background-color: #c8e6c9; padding: 2px;"><b>SITE 17 – PROPOSED LGS AS DESIGNATED BY FOTW NPG</b></p> <p style="text-align: center;">NPPF 2012 Local Green Space (LGS) Criteria (score ranges as shown)</p> <table border="1" style="width: 100%; border-collapse: collapse; text-align: center;"> <thead> <tr> <th style="font-size: small;">Access 0-4</th> <th style="font-size: small;">Proxim. 0-4</th> <th style="font-size: small;">Bounded 0-4</th> <th style="font-size: small;">Special 0-4</th> <th style="font-size: small;">Rec/Edu. 0-4</th> <th style="font-size: small;">Beauty (inc. views) 0-2</th> <th style="font-size: small;">Transp. 0-2</th> <th style="font-size: small;">History 0-4</th> <th style="font-size: small;">Wildlife etc. 0-4</th> <th style="font-size: small;">Total Score 32</th> </tr> </thead> <tbody> <tr> <td>1</td> <td>3</td> <td>4</td> <td>4</td> <td>2</td> <td>2</td> <td>2</td> <td>3</td> <td>3</td> <td>24</td> </tr> </tbody> </table> <p>Field, horse-grazed grass, frequent herbs, back gardens of Great Lane to west, adjoins 016 with large gap in hedge and should be considered extension of it as it shares many features such as hedges, trees and archaeology. Informal dog walking/nature watching. Shine LE8012. Ridge and furrow extending up from 016 and ground still rising. Lovely views to Kirby Bellars church spire. Pond – fenced off + surrounded by young willows and other trees - managed? Rabbits.</p> <p><b>Objections and Response to score</b></p> <p><u>Access</u> There is no public pedestrian or vehicular access to this land, the field and pond is invisible to anyone other than trespassers, the score should therefore be reduced to 0. Treating site 17 as an extension of site 16 would contravene one of the guiding principles as it would create an extensive tract of land (relative to other tracts in the vicinity).</p>	Access 0-4	Proxim. 0-4	Bounded 0-4	Special 0-4	Rec/Edu. 0-4	Beauty (inc. views) 0-2	Transp. 0-2	History 0-4	Wildlife etc. 0-4	Total Score 32	1	3	4	4	2	2	2	3	3	24	<p>The late Christine Hayward allowed residents to walk the fields and to view her fish pond in field 17. For example, a letter from one resident says “I walked the fields freely when Christine was alive and would intentionally join her off the footpath, usually because [dog’s name] would run to her from 200 yards or more for a treat. I’d then walk with Christine</p>	<p><b>No change</b></p>	
Access 0-4	Proxim. 0-4	Bounded 0-4	Special 0-4	Rec/Edu. 0-4	Beauty (inc. views) 0-2	Transp. 0-2	History 0-4	Wildlife etc. 0-4	Total Score 32																
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		<p><u>Bounded</u> The site is not bounded on all sides by hedgerows. The site is bounded on the east side by housing and a wire fence. Additionally, the South of the site, although currently bounded by hedgerows, will soon be bounded by the new development on Great Lane. The score should therefore be reduced to 3 for this aspect.</p>	<p><i>on her route. Many times I'd come down from the top fields to join her and she seemed not to mind where I went or had been. She never told me not to walk up there, which I did regularly to get more exercise. Indeed, she once asked if I'd seen the goldfish in her pond uphill to the south."</i></p> <p>It will also be adjacent to the FRIS 1 development site and viewable from paths and recreation areas within the site. The land is in direct the view from existing houses on Great Lane. Our consultants, Your Locale, have recommended increasing the score for Access to 2.</p> <p>The field is bounded to four sides. The material of the boundary is not a</p>	<p><b>NP update Appendix C. Access Score for Site 17 increased to 2.</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p><u>Recreational/Educational</u> The landowners have never given consent or agreement to any informal dog walking/nature watching as described in the narrative, any such action would be trespass. As the site is inaccessible it offers no recreational or educational significance as such the score should therefore be 0-1 for this aspect.</p> <p><u>Beauty and Tranquillity</u> Similarly, as the site is not accessible the tranquillity and beauty should be reduced as it cannot be enjoyed by anyone other than trespassers. The presence of horses on the site and the fact that the West side is overlooked by houses, will also adversely affect any tranquillity, so the score should be reduced to 1. The narrative description concerning views to Kirby Bellars church spire from this site is inaccurate, as any views there might have been from this field are obscured by the irregular lay of the land and a large Ash tree and partial hedge. Any views to Kirby Bellars church, as referred to, can only be seen from the other side of the hedgerow in the adjoining fields, which would also be trespass. The West side of the site is open to the adjoining property and any view in this direction is directly into their kitchen and conservatory. The score for beauty should therefore also be reduced to</p>	<p>consideration here.</p> <p>As above, some residents have used the land informally, and with the late Mrs Haywards consent, for dog walking and health and fitness provided by the slope of the land. The scoring system also allows for <i>potential</i> future recreational/educational use subject to landowner agreement – the tone of the comments suggests a change of owner in the near future.</p> <p>Beauty and tranquillity is not affected by the presence of horses and the sloping terrain directs residential and road noise away from the field. The observation regarding the view to Kirby Bellars church has been moved to the relevant field descriptions</p>	<p><b>No change</b></p> <p><b>No change</b></p> <p><b>NP update Appendix C. Sentence . “Lovely views to</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	<p>1.</p> <p><u>History</u> The ridge and furrow feature is not a particularly good example of the technique and, as it runs perpendicular to site 16, is demonstrably not an extension of site 16 as the narrative suggests. Ridge and furrow is common and not of any particular special interest so the scoring for this field should be comparable with sites 18, 19 and 22 with a score of 2, that have also been recognised as having ridge and furrow. The score for this aspect should be reduced to 1.</p> <p><u>Wildlife</u> Regarding wildlife, there are no rabbits as far as is known (they inhabit site</p>	<p>in Appendix C, although the residences in this location do have this view. The property you refer to on the west boundary maintains a hedge of average height, so is not 'open'. The score will not be changed in the NP.</p> <p>This smaller section of the large ridge and furrow system pertains to the more recent (200-400 years ago), pre-enclosure farming system of the area rather than the medieval section in the other fields. Field 17 will contain the surviving remnant of this type of ridge and furrow after development of FRIS 1 occurs. See also reference to MBC Fringe Sensitivity Study above supporting retention of ridge and furrow in this area.</p>	<p><b>Kirby Bellars church spire.” Moved to description of site 16”</b></p> <p><b>No change</b></p> <p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>22 &amp; 23), and the pond is inhabited by common goldfish. Other sites with ponds score less than 3 and neighbouring sites have scored 1-2, so for parity the score here should also be less than 3. The pending new development site off Great Lane borders site 17 and site 18 and shares the same topography, landscape and wildlife characteristics. The recent wildlife/ecology assessment of the Great Lane development site states<sup>17</sup> <i>‘There are no known protected species on the site.....from the biodiversity study the site has been identified to be of low ecological value’</i>. The score for this aspect should therefore be reduced to 2.</p> <p><u>Special</u> The Leicester and Leicestershire: Local Green Spaces Toolkit and Existing Policy Context states that “A common sense approach to the criteria will need to be taken. It is clear that the Government does not intend green spaces which are isolated”<sup>18</sup> Given that the site is isolated and not accessible to the public, and as such has no recreational or educational value, has limited wildlife and is of low ecological value, is a poor example of ridge and furrow, the score for special should be reduced accordingly from 4 to 2 on a par with sites 18, 19 and 22.</p>	<p>Rabbits are present near the pond. The herons and egrets are regular visitors to the pond. Tawny owls have been heard by residents. Hedgehogs (a BAP species) use the land, amongst other creatures (Community Wildlife survey).</p> <p>The site is not isolated, but proximal to the village. The MBC “Areas of Separation, Settlement Fringe Sensitivity and Local Green Space Study” Final report comments recommending retention of ridge and furrow and providing green space quoted above applies here. The field is important to the</p>	<p><b>No change</b></p> <p><b>No change</b></p>	
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<sup>17</sup> Draft NP Plan appendix F, page 12

<sup>18</sup> GREEN SPACES IN LEICESTER AND LEICESTERSHIRE: LOCAL GREEN SPACES TOOLKIT AND EXISTING POLICY CONTEXT p.7

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

SITE 17 – SUGGESTED REVISED SCORING FOR LGS ASSESSMENT									
NPPF 2012 Local Green Space (LGS) Criteria (score ranges as shown)									
Access 0-4	Proxim. 0-4	Bounded 0-4	Special 0-4	Rec/Edu. 0-4	Beauty (inc.views) 0-2	Trang. 0-2	History 0-4	Wildlife etc. 0-4	Total Score: 32
<b>0</b>	<b>3</b>	<b>3</b>	<b>2-3</b>	<b>0-1</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>16</b> <small>(assuming the highest suggested score)</small>
<p><b>SITE 18</b> Although this site has not been designated as LGS, the scoring does not accurately reflect the site and the site should be scored equally with adjoining site 19 for parity and consistency.</p> <p>Extract below taken from p5 of revised appendix C.</p>									
SITE 18 – PROPOSED LGS AS ASSESSED BY FOTW NPG									
NPPF 2012 Local Green Space (LGS) Criteria (score ranges as shown)									
Access 0-4	Proxim. 0-4	Bounded 0-4	Special 0-4	Rec/Edu. 0-4	Beauty (inc.views) 0-2	Trang. 0-2	History 0-4	Wildlife etc. 0-4	Total Score: 32
<b>2</b>	<b>3</b>	<b>4</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>2</b>	<b>21</b>
<p>Large field, horse-grazed grassland, contiguous with 016 via small gap in hedge. Frequent herbs in grass. Tall hedges with ash, field maple and other trees surround. Footpath, much-used. Deep ridge + furrow – part of SHINE LE8012. Awaiting further habitat survey.</p>									
<p><b>Response to score</b> The site is not contiguous with site 16, it has more similarities and features of site 19 and therefore should be classified in a comparable manner and the scoring amended accordingly</p>									
					<p>integration of the village edge with surrounding countryside and moorland, in the light of the Permit to Build on the adjacent site, FRIS 1.</p> <p>NPAC has reviewed the scoring for this field and supports the original scoring and the addition of a further point for access as suggested by our Consultant.</p> <p>The phrasing in the description will be amended to remove the reference to 'contiguous with 016'. There are distinct similarities to both adjacent sites 16 and 19, the score reflects that.</p> <p>The proximity has been scored such that the first row of fields adjoining the village are 'proximal' and</p>				
					<p><b>NP already updated</b></p> <p><b>NP update to Appendix C – remove phrase "contiguous with 016 via small gap in hedge"</b></p>				

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p><u>Proximity</u> The site is located a similar distance from the village as site 36 and equidistance from any residences as site 19, the score should therefore be reduced to 2.</p> <p><u>Beauty (inc views)</u> Like site 19 there is a footpath on this site. The footpath runs in dip along the bottom of the field and as such there are no views, any access away from the footpath would be trespass therefore views from site 18 are the same as site, or worse than site 19. The pond at the top of the field is shallow and dry for much of the year, any water present is of 'poor quality', with no plant life, as evidenced by an ecology survey undertaken by Richborough Estates in May 2016. Like site 19, this site is grazed for much of the year and the lower half of the site is well trodden by dog walkers, so the appearance of frequent herbs is questionable and if they were present would be consistent with neighbouring site 19. The score should be reduced to 1 for parity with site 19.</p>	<p>score 3. The score will be reduced to 2.</p> <p>The site features in photographs of the parish at a high frequency, the 'dip' you mention is not evident. The view up the hill, within the site, is widely viewed as being beautiful, particularly when the sun is at a low angle and the ridge and furrow casts long shadows. The ecology of the site is addressed below in the relevant section. Site 19 runs alongside the railway, unlike this field. Site 19 also has a high voltage electricity pylon and cables crossing the land. Field 18 does not share these features.</p> <p>The LCC Phase 1 survey classifies the two sites you</p>	<p><b>NP update to Appendix C Change Site 18 Proximity score to 2 and adjust total score. to 20 No change</b></p> <p><b>No change</b></p>	
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p><u>Tranquillity</u> The tranquillity offered is the same as site 19, there is a well used footpath across sites 18 and 19 so for parity the score should be reduced to 1.</p> <p><u>Wildlife</u> This site sits between and is bordered by the pending new development site off Great Lane and by site 19 and as such it shares the same landscape and wildlife characteristics. The recent wildlife/ecology assessment of the Great Lane development site states<sup>19</sup> <i>'There are no known protected species on the site.....from the biodiversity study the site has been identified to be of low ecological value'</i>. The score for this aspect should therefore be reduced to 1 for consistency with site 19.</p>		<p>wish to compare with site 18 differently with respect to ecology of the grassland – FRIS 1 grassland is described as 'poor'. The sward in Site 19 is 'probably SI but may be of more interest' and is awaiting further survey by LCC. The FOTW NP adheres to 'Space for Wildlife – the LLRBAP' and is concerned by the rapid decline in the number of small field ponds across Leicestershire.</p> <p>The score for site 18 in Appendix C will be reduced by one point as agreed above.</p>	<p><b>No change</b></p> <p><b>NP already updated</b></p>	
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<sup>19</sup> Draft NP Plan appendix F, page 12

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

SITE 18 – SUGGESTED REVISED SCORING FOR LGS ASSESSMENT									
NPPF 2012 Local Green Space (LGS) Criteria (score ranges as shown)									
Access 0-4	Proxim. 0-4	Bounded 0-4	Special 0-4	Rec/Edu. 0-4	Beauty (inc. views) 0-2	Transp. 0-2	History 0-4	Wildlife etc. 0-4	Total Score 32
<b>2</b>	<b>2</b>	<b>4</b>	<b>2</b>	<b>2</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>1</b>	<b>17</b>

**4) Flawed Consultation Methodology**

It is my view that the consultation process is fundamentally flawed for the following reasons:

a. Contrary to guidance issued by Leicestershire County Council<sup>20</sup> clearly stating that *“Land ownership is an important consideration in designating Local Green Spaces. The owners of sites should be involved from an **early stage to ensure the owner’s support for the designation.** This is to make sure that the designation is viable. As a **minimum** a Local Authority should contact the land owner of the potential Local Green Space Designation to **receive support** for the designation.”* The landowners of sites 15, 16, 17, 18, and 22 have never been approached, consulted or involved in discussions about LGS designation. The first time the landowners were made aware of the proposed designation was through a letter dated 6<sup>th</sup> February 2017 from the FOTW NPG when the draft NP was due to be out for consultation the next day. As is evident from this response, the landowners do not support the designation of sites 16 and 17 under POLICY ENV 1: protection of local green spaces,

The comments appearing in this section are repeated and have been addressed elsewhere in this response.

**No change**

<sup>20</sup> GREEN SPACES IN LEICESTER AND LEICESTERSHIRE: LOCAL GREEN SPACES TOOLKIT AND EXISTING POLICY CONTEXT p9



## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>nor the identification of site 18 under POLICY ENV2: protection of other sites of environmental (natural and historical) significance as it places significant constraints on the land use, and is likely to significantly reduce its open market value. Given the Parish Council's obligations as a public body under the Human Rights Acts 1998, it would have been strongly advisable to consult the land-owners prior to designation given the significant constraint on the development rights and use of the land, not only to ensure that the designation was viable, but a more compelling argument would be that it meets the above Human Rights obligations.</p> <p>b. Key consultation documents, specifically Appendix C, Environmental Inventory, were changed more than half way through the consultation period (8/3/17). The scoring for proposed LGS Site 16 was amended from 20 to 27, changing the ranking of this site from 13<sup>th</sup> to 1st. This has had a significant negative impact on the landowners as in order to respond accurately and appropriately to the consultation all relevant information was not made available. Additionally, the inaccuracies are misleading, as anyone else responding to the draft NP would be doing so without having full and accurate information relating to sites selected for LGS designation. This is a legal document and as such provision of misleading/incorrect information during a statutory consultation period would arguably render the consultation invalid.</p> <p>c. Despite numerous requests by the landowners to FOTW NPG for access to key information pertaining to the LGS designation, to enable an informed response to be submitted, nothing has been forthcoming. Specific requests have been made concerning scoring descriptors, information relating to heritage sites and sites of historic interest and</p>				
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## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

		<p>information concerning community members involved in the LGS assessment and designation recommendations and potential conflicts of interest. A Freedom of Information request to obtain this information was submitted on 13/3/17, although it should be noted that the timescales for this will mean that the information was not available to inform any response to this draft NP.</p>				
9.	Page 47, 3rd Para	<p>These sites will be added to as the inventory is expanded to cover the whole of the parish". Could the meaning of this sentence be articulated? The Group are reminded that the LGS designation is one of highest levels of protection afforded by the NPPF and as such should be used relatively sparingly to ensure it doesn't become diluted or that sites be removed through examination. In particular concern that some of these LGS designations do not meet the NPPF criteria. 01; 028; and 016/017 are extensive tracts of land. 032 is not especially local in nature.</p> <p>Point of clarification also, the MBC Areas of Separation, Settlement Fringe Sensitivity and Local Green Space Study is an adopted piece of evidence, not a consultation document (and as such is already being used to decide planning applications) and the rationale for deviations from this evidence</p>	Melton Borough Council	<p>This comment should not have appeared in this section of the Draft NP and will be removed.</p> <p>Noted. LGS 28, 32 and 57 have been re-classified and are no longer LGS, but remain highly valued sites within the parish. The NPPF does not define 'extensive' so it is open to local interpretation. Here, for example, Sites 01, 16 and 17 are similar in size (2 – 7 Ha) to various Planning Applications in the Plan Area.</p> <p>Noted.</p>	<p><b>NP updated to remove sentence p47. Para 3 "These sites will be added to as the inventory is expanded to cover the whole of the parish"</b> NP already updated re LGS.</p> <p>No change</p>	<b>Statutory Consultee</b>

## Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan

	need to be properly documented.				
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### Appendices

No.	Plan section/ policy number	Comments	From	Response	Proposed amendment	
10.	<b>Appendix C</b>	It has been brought to the attention of the authority that this appendix was changed (albeit through a administrative error) during the consultation. It may prove prudent to create a note for circulation outlining the changes made and the rationale behind it.	Melton Borough Council	Noted. NPAC acknowledge that copy-editing errors appeared in the scoring of two fields in Appendix C and have expressed gratitude to Ms Hayward for bringing it to our attention. The publisher had ‘copy and pasted’ the scores for the preceding field in each case, thereby making the LGS fields appear to have a much lower score (that wouldn’t qualify for LGS). The original working document (unchanged since 16 <sup>th</sup> Nov 2016) was uploaded to the website within 24 hours of you pointing the errors out to us, and all LGS landowners were immediately told.	<b>NP already updated.</b>	<b>Statutory Consultee</b>

**Regulation 14 consultation – Frisby on the Wreake Neighbourhood Plan**

**ENDS**