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Dear Neighbourhood Plan Group

RE: Wymondham and Edmondthorpe Neighbourhood Plan 2016 - Pre-submission Consultation

Thank you for Submitting the Wymondham and Edmondthorpe Neighbourhood Plan 2016 to Melton Borough Council.

Melton Borough Council fully supports the community's initiative to produce a Neighbourhood Plan and recognises that this is a community-led process. Melton Borough Council's comments to this consultation can be found below. We will publish all responses to this consultation on our website. Moreover, we will start the process of recommending examiners.

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).

- A. Whether the Plan has regard to National Planning Policy and advice;**
- B. Whether the Plan contributes to Sustainable Development.**
- C. Whether the Plan is in general conformity with the Council's own development plan;**
- D. Whether the Plan complies with various European Obligations;**

It is important to note that in the past months there has been some development of the Melton Local Plan and where we are able we will direct you to these. 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. We note your responses to our Reg 14 submission, though we maintain that response remains for the most part material, but doesn't require repeating in this correspondence. The Inspector can view our previous comments if they are inclined to do so.

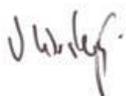
Policy/Part of Plan	Comments
Overall	Use numbers not bullets in policies for clarity.
Page 9	<p>These figures are not settled and have been the subject of widespread representation, both in terms of the LP provision overall and the distribution with it. These are yet to be considered so there could be change, including through the LP Examination process.</p> <p>On Edmondthorpe, adding that the limit of 3 is related to criteria which in require that they add to sustainability – it not just an up to 3 limit with no constraint</p>
SD3: Limits to Development	The LTD for Wymondham allows for the Local Plan allocations, but apart from that is the exact boundary of the Village Envelope in the 1999 Local Plan. Concern that this will not be in conformity with Policy SS3 of the Pre-Submission Local Plan which allows for unallocated small scale development of up to 10 dwellings within and adjacent to settlements. However it must be remembered SS3 only allows development that meets perscribed criteria.
H2: Housing Allocations	SHMA 2014 has been superseded by the HEDNA 2017.
Page 22 onwards	('H') policies – affordable housing parts should be reviewed in light of latest evidence (HEDNA)
Page 27	On page 27, there are two errors: one in the second paragraph, which refers to social housing as an ownership model. Social housing is rented. The second is in the third paragraph. It states “the draft Local Plan contains a requirement to provide 37% affordable units on-site for all developments with 10 or more dwellings”. It does not state this. Instead it should read as 11 or more.
Page 28	The interpretation of the comparisons used on the housing stock between the parish and the rest of the Borough are inaccurate: the Plan states “the Parish has significantly more 2 bedroom houses than Melton Borough (28.5% v 21.7%) but a matching deficit in 3 bedroom dwellings (36.3% v 46.3%). Its stock of houses with 4 or more beds is relatively high by comparison with Melton Borough (31.3% v 6%) while 1 bedroom houses are in short supply”. For the 2 bedroom houses the conclusion is that the difference of 28.5% v 21.7% is significantly more. However, the conclusion for the 3 bedroom dwellings (36.3% v 46.3%) is of a matching deficit. There is a 10% difference; even more than the difference in the 2 bed properties. Perhaps this is a typo and it should have read as the same? For the 4 bedroom properties, the difference (31.3% v 6%) is described as “relatively high”, but this is significantly higher.
H6: Affordable Housing	The policy of 37% affordable housing will need to be underpinned by evidence of housing need and viability. If not and it simply reflects the policy position in the Local Plan, this policy could possibly change to reflect the whole plan viability assessment results – a refresh of this evidence is being undertaken.
H7: Building Design Principles	<p>Bullet 9 & 10</p> <ul style="list-style-type: none"> “Development should incorporate sustainable design and construction techniques to meet high standards for energy and water efficiency, including the use of renewable and low carbon energy technology, as appropriate”; <p>The terms “as appropriate” would benefit from clarification? Policy cannot ask for standards of energy and water efficiency above the requirements in Building Regulations without justification. Policy cannot <u>require</u> the use of renewable or low carbon energy. It can only support/encourage.</p> <ul style="list-style-type: none"> “Development should incorporate sustainable drainage systems with maintenance regimes to minimise vulnerability to flooding and climate change; ensuring appropriate provision for the storage of waste and recyclable materials”;

	In NPPG, SuDS is a requirement for all major development and development at risk of flooding, but might not be a requirement for minor development proposals not at risk of flooding.
8.1 Local Green Space	The Melton Areas of Separation, Settlement Fringe Sensitivity and Local Green Space Study is not a consultation document. It is a fully adopted evidence document supporting the Pre-Submission Local Plan.
ENV1: Local Green Space	The Park Fields (284/405) form an extensive tract of land which would contradict the designation criteria as Local Green Space according to the NPPF. This is also likely the reason why this area was not considered by the consultants preparing the Borough wide Local Green Space evidence.
8.4 Woodland, Trees and Hedgerows	Additional evidence supporting trees and woodland can be found in the surveys for Wymondham sites in the Melton Biodiversity and Geodiversity Study 2016.
8.5 Biodiversity	Reference the Melton Biodiversity and Geodiversity Study 2016 as evidence may strengthen this content.
ENV7: Protection of Important Views	Concern that the protection of views of Wymondham and Edmonthorpe from the surrounding countryside amounts to designating a partial 'Green Belt' around the villages. Particular concern is with views a), b), g), h), i) and j). Local views e) and f) are supported as there is inter-visibility between the windmill and the historic core of the village, and also view d) which is local in nature . Views between Wymondham and Edmonthorpe are supported in principle where inter-visibility is important, but should not amount to an Area of Separation by another name.
8.8 Flooding	Reference the Melton Strategic Flood Risk Assessment 2015 and 2016 Addendum as evidence.
Figure 10	Needs a key to identify which flood zones are illustrated.
12. Developer Contributions	The CIL Review was published alongside the Housing White Paper in February 2017 and recommends replacement of CIL with amended S106 and a new Local Infrastructure Tariff. The identification of priority infrastructure projects is supported. The CIL Review recommends that LIF should fund community infrastructure projects where these are set out in a Neighbourhood Plan. The Government will announce its intentions regarding CIL in its Autumn statement 2017.

The community are congratulated for making considerable progress on the Neighbourhood Plan. Melton Borough Council again welcomes the opportunity for continued communication on the interlinking relationship between the Neighbourhood Plan and Melton Local Plan.

Should you wish to discuss any of the points made in this correspondence, please do not hesitate to get in contact.

Yours sincerely



Jim Worley
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Melton Borough Council