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Date: 05th July, 2017

Dear Neighbourhood Plan Group

RE: Frisby Neighbourhood Plan 2016 - Pre-submission Consultation

Thank you for Submitting the Frisby Neighbourhood Plan 2017 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, nor have we commented on minor issues such as typos. 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, including both common

ground and areas of dispute. This correspondence therefore relates to the most significant outstanding issues and those arising from changes between Pre-submission and Submission versions.

Firstly, much concern has been raised with regards to the consultation held in relation to the Neighbourhood Plan. The Borough Council will not, nor has not, the remit to comment on this, however it accepts this is an issue the examiner may wish explore through the examination. In particular those consultations which relate to site selection and LGS designations as historically these have been contentions within the Parish. The Neighbourhood Plan group therefore should be fully satisfied and confident that the consultation conducted to date is both appropriate and transparent, and that an examiner will be satisfied by it. The "Regulation 14 Comments Summary & Consultees document insofar as it relates to the Regulation 14 document is noted. However, what perhaps would be beneficial to the examiner would be extra information on additional consultation work that was completed (essentially an extension of Appendix I), especially wherein it has had a large effect on the submitted plan. In particular the survey that aided the housing allocation decision between the regulation 14 and 16 documents. Of use would be further information on the way the community was consulted, the weight given to the survey and its justification in planning terms. For example, was any supporting information provided with the survey, discussing the benefits of different options? Whilst community preference is a material consideration in planning decisions, it must be balanced against evidence and reasoned justification.

Secondly, and importantly moving on from the points raised above, is the decision made to allocate the extension as opposed to the other sites currently included in the Local Plan. As the site was not promoted through the Local Planning process, and as the site is not yet subject to a planning application, MBC holds less evidence to the suitability of this site than it does other sites in Frisby. The Authority accepts there are both benefits and disadvantages associated with the delivery of one site versus multiple, including elements such as deliverability and amenity. The Neighbourhood Plan group are reminded that two other sites currently are included in the Local Plan and are subject to planning applications which are likely to be determined before the NP is Examined and 'made'. It is likely that, depending on consultation responses received in the upcoming Local Plan consultation, that there is no further opportunity to change the sites in the Local Plan apart from the Examination process. Therefore you may need to come to the Local Plan examination to promote your site selections over those in the Local Plan. Unlike the previous response sent to the regulation 14 consultation, we now do not consider it necessary to allocate a reserve site.

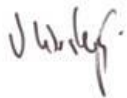
Another contentious issue is that of LGS designations. Despite dialogue between the group and the Authority, we still maintain the view in our previous response to the regulation 14 consultation, that LGS designations should not be extensive open tracts of land. Clearly this is a risk for the NP Group to consider; whether you wish to go to Examination with a risk that an Examiner's interpretation of the NPPF definition may rule against such a site. The Authority is also aware of concerns raised by members of the community in relation to this matter. It will therefore be up to the Examiner to come to a conclusion on the points raised above and decide whether or not they should remain in any plan going out to Referendum.

The Borough Council are currently working with the Neighbourhood Plan Group to resolve the issues raised by Historic England in relation to the SEA screening opinion.

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

A handwritten signature in black ink, appearing to read 'Jim Worley'.

Jim Worley

Head of Regulatory Services
Melton Borough Council