

Direct Line: 01664 502502
Please ask for: J Fiz Alonso
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Date: 2019

Dear Neighbourhood Plan Group

RE: Ab Kettleby Neighbourhood Plan 2019, pre-submission consultation

Thank you for Submitting the Ab Kettleby Neighbourhood Plan 2019 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. We will start the process of recommending examiners to you shortly, but in the meantime, please could you provide an early indication as to whether you feel you will need to undertake additional consultation arising from any changes you intend to make to the Neighbourhood Plan.

The remainder of 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; and**
- D. Whether the Plan complies with various European Obligations.**

The Melton Local Plan 2011-2036 was adopted by Full Council on October 10, 2018. It sets out the Council's policies for the use and development of land across the whole of the Borough. It replaces the saved policies of the 1999 Melton Local Plan. The Local Plan is the main part of the development plan for the Borough and will be given full weight by the Council in making decisions on planning applications. This also means that, as stated above, Neighbourhood Plans must be in general conformity with the strategic policies within the adopted Local Plan. Also, as specified in para 1.8.5 of the Local Plan:

'For the purpose of testing conformity of Neighbourhood Plans with the Local Plan, all policies included in the Local Plan up to and including Chapter 8 are regarded as strategic policies. Whilst the remaining policies will be relevant for determining planning applications, they are not viewed as strategic policies for the purpose of testing Local Plan conformity.'

To help your understanding of our comments, we have structured our comments into themes. Suggested new text to be inserted is indicated in bold, and text to be removed has been struck through The MBC response for regulation 14 consultation has been added in Appendix A for your convenience.

At the end of this response, there is a summary of those amendments MBC consider essential to be considered by the NDP towards the examination, while other comments in our response are provided in the spirit of supporting the group.

General and Strategic framework

2. How the Neighbourhood Plan fits into the Planning System (p. 6-7)	<i>The Neighbourhood Plan is therefore intended to support the strategic policies contained in the adopted Melton Local Plan and the Submission Version Local Plan and the requirements of the NPPF.</i>
Figure 1 (p. 10)	Missing OS copyright and MBC acknowledgment: Melton Borough Council License Number 100019651 [2018]. Contains Ordnance Survey data © Crown copyright and database rights 2018].
7.1. The Strategic Framework (p.15)	<i>The Submission Version adopted Local Plan for Melton</i>
7.1. Limits to Development (p.15)	Subject to the independent examiner to consider whether the whole concept is in general conformity with the Local Plan
7.1. Limits to Development (p. 16)	<i>The adopted Local Plan removed the existing village envelopes contained within the Adopted previous 1999 Local Plan Core Strategy and...</i>
Policy S1. Limits to Development (p. 17)	For development management purposes, it may be worth splitting the policy in two sections: in and out of the boundary to add spatial clarity to its implementation

Housing

Policy H1 (site A) (p.20)	Inclusion of ABK1 welcomed
Policy H1 (site B) (p.20)	<i>It becomes necessary to provide for additional homes in the Parish in accordance with any new development plan document that replaces or takes precedence over the Melton Local Plan, by virtue of being more up to date.</i>
Housing allocations (p.19)	<i>[...]At this stage, the potential impact of the final version of the Leicester & Leicestershire Strategic Growth Plan remains uncertain for the period beyond the Local Plan period (2036-2050). – to make reference to its recent adoption</i>
Windfall sites (p.22)	<i>To help protect the nature of the Village Character, development beyond the housing allocation described in H1 above will be restricted to windfall sites within the Limits to Development and will be of no greater size than twofive new properties on any single site.</i> This seems to be contrary to para 4.2.17 of the Local Plan – <i>Schemes of up to about 5 dwellings for Rural Hubs may be appropriate...</i> This paragraph is also contrary to some bits of the NDP content – 7.2 Housing – Overview – [...] <i>Given the small size of Wartnaby and Holwell the preferred mode of expansion will be through the development of small windfall sites suitable to a countryside location</i> (and therefore out of the LTD). It is suggested to amend the threshold and to remove the restriction to areas within the LTD (does not seem to be practical for Development Management purposes).
Policy S1. Limits to	As a consequence of my point above [...] <i>Land outside the defined Limits to</i>

development (p.17)	<i>Development will be treated as open countryside, where development will be carefully controlled in line with local and national strategic policies alongside other policies in this Plan – this will help the policy to include any potential windfall site as stated above</i>
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Affordable Housing

Policy H1, site B	The policy asks for 33% affordable housing provision. The whole plan viability evidence for the Local Plan has identified that a minimum 25% affordable housing is viable for Ab Kettleby. Therefore, although we support a higher than 25% affordable housing, it may prove difficult to secure 33% for this site.
Policy H1, site B	The policy states that the affordable units will be offered for intermediate housing, including starter homes, where possible. For this specific site of a total of 12 properties; 25% affordable housing equates to 3 properties. There is only one affordable home ownership property in the NP area and 20 Council rented properties and so this element of the policy H1 is supported.
Policy H1	Priority given to dwellings of 3 bedrooms or fewer in H1 is supported.
Policy H2	Housing Mix is supported.

Design

Please note that MBC is preparing a Design SPD and some of the matters on the NDP may be covered by this SPD. Given the Borough-wide nature of the work undertaken by MBC, the SPD may not be able to achieve a level of detail similar that the one that can be achieved through the NDP.

Windfall sites (policy H3) p20-21	Discussion above policy regarding size of units but no inclusion in H3 specifically. You may wish to consider adding in a further bullet point to emphasise issue as policy more clearly? Or could it be included in the reasoned justification? Wording regarding no greater than 2 units: is this appropriate? Suggest phrasing it as 'typically' no greater than 2 dwellings. There may be unintended consequences of a policy that limits windfall developments to 2 dwellings, e.g. you may end up with 2 larger dwellings rather than better mix of three smaller units. You could refer to the application of our Housing Mix policy as a way to achieve this.
Design standards – policy H4 Housing Design–p21-22. a)	Is in general conformity with MLP, however it does not add any real additional clarity beyond Melton Local Plan policies EN6 and D1. There is an opportunity to clarify what local distinctiveness is here to ensure that development has regard to it, and any differences between settlements in the NP area which are touched on briefly in introduction to chapter 7.3 (the environment). Such characteristics are likely to be local in nature but examples can include; a local pattern of development form (all street fronting or set back, linear or in clusters/courtyard; are there and specific roof types or pitches; differences in materials or styles in each settlement).
Design standards – policy H4 Housing Design–p21-22. b)	Is in conformity with MLP and provides additional clarity to policy D1.k (Makes adequate provision for car parking). It is in line with Leicestershire County Council (LCC) highways design code for smaller sized developments under 5 dwellings (most relevant to planned development of area over NP period). Requirements reflect demonstrated higher levels of car ownership in local population, rural location and limited public transport as recognised in LCC highways design code.
Design standards – policy H4 Housing Design–p21-22. c)	Considered to be in general conformity with MLP and references to local brick and ironstone add local clarity to MLP policy. As above, is there any more detail that can be added to this? Any other local design that could reflect the local architectural character? Any differences between settlements in NP area?
Design standards – policy H4 Housing Design–p21-22. d)	National planning policy requires local planning authorities to encourage good design in order to limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation. MLP policy EN1.ii.6 supports this (to not have an unacceptable adverse effect upon areas of tranquillity, including those benefiting from dark skies, unless proposals can demonstrate how it is intended to contribute towards minimizing light pollution). We recognise that the NP area benefits from areas with dark skies and the value that the community place in this and wish to protect this important asset. However

	<p>well-designed public lighting can sometimes be appropriate, it can increase the opportunity for surveillance at night and sends out positive messages about the management of an area, and can help to reduce crime and disorder (e.g. see secured by design standards).</p> <p>I cannot however find any reason for the proposed ‘50m from existing street light’ definition for dark at night as proposed in this policy. I do not understand why it has been used as basis to define for dark at night or why it would be required. It is not an accepted definition in any government’s planning guidance for light pollution. I would suggest the removal of this definition and a refocus of the policy to consider any light pollution from development in general and how this can be limited given the degree of dark skies that the NP area has (as illustrated by the Campaign to Protect Rural England’s mapping tool).</p> <p>I would also note that there are limited planning requirements for the installation of domestic security lighting, which can be simply purchased by homeowners and installed without planning requirements. The policy in terms of security lighting is likely to have a limited impact, however poorly installed security lighting has one of the greatest potential impacts on light pollution in residential areas and I understand the aims of the policy and why the NP would wish to include a reference to it. It may be appropriate to consider including a community action for this issue, to raise awareness in the local community about dark skies and light pollution and the action they can take to reduce it. This could include providing advice on how to install and choose security lighting for those who deem it necessary, to minimise any light pollution as well as any impact on neighbouring properties.</p> <p>I would suggest that consideration is given to change the wording of this policy to remove the reference to 50m and refocus on the consideration of light pollution as a whole as the consequence of any development. An example of alternatively wording could be, “d) Development proposals should consider potential light pollution and how it can be limited, particular in areas with dark skies. Where externally visible lighting is essential, it should be designed in such a way that nuisance is reduced and the effect on the night sky in the countryside minimised. Security lighting should be appropriate, unobtrusive and energy efficient”. You may wish to add some explanatory text about the amount of dark skies in the NP area and why these are worth preserving to highlight the issue as well.</p>
<p>Design standards – policy H4 Housing Design–p21-22. e)</p>	<p>Technology is still developing in this area and NP may wish to reconsider whether specifying 7kw cabling is best way to achieve ambitions for electric charging points. 7kw cabling may add to total development costs and negatively impact overall viability. Over the course of the NP optimum kw cabling may change as technology advances and battery requirements may change. Having policy that specifies the precise kw of cabling may therefore have unintended negative consequences.</p> <p>Cabling type is not specified within the local plan or the NPPF. 7kwh cabling is currently considered ‘faster’ charge cabling (around 4 hours); 3.7kw cabling would be slower charge (around 8 hours) charging. The latter may be more suitable for residential properties given overnight charging opportunities and lower overnight network energy requirements, reflecting government long term ambitions for most recharging to be done overnight at the home when there is lower energy demand. This is the only reference to electric vehicle charging in the NP. The NP does not make any reference to there being sufficient capacity in the local network to support this policy or indicate whether any discussions have occurred with the network operator regarding 7kw cabling installation.</p> <p>Consideration may need to be made to the wording of this to remove specific reference to 7kw cabling. However, this then becomes a repetition of Melton Local Plan policy EN9 (8) (Charging points for electric cars).</p>
<p>Design standards – policy H4 Housing Design–p21-22. f)</p>	<p>Considered in general conformity with MLP but considered to add no greater clarity to existing Melton local plan policy D1.h. (Existing trees and hedges should be utilised, together with new landscaping, to negate the effects of development) and EN1 (landscape).</p>
<p>Design standards – policy H4 Housing Design–p21-22. g)</p>	<p>Considered in general conformity with MLP to add clarity to local design of development above Melton Local Plan policy D1.</p>

Design standards – policy H4 Housing Design–p21-22. h)	The inclusion of sustainable design and construction criteria is welcomed in the NP, however the sustainability criteria listed in policy H4 is considered to add no greater clarity to existing Melton local plan policy EN9 (Ensuring Energy Efficient and Low Carbon Development) and D1(raising the standard of design).
General comment re: design	There is little explanatory text before the design policy H3. What is each village’s architectural character? Can the NP provide any further clarity on what this means? Can this section possible be improved with some examples such as a selection of images of local architecture character, an explanation of what local distinctiveness is and the type of design that you are seeking to promote to reflect this. This would be particularly beneficial to small scale developers and homeowners looking to extend their homes as they may be less likely to engage a professional with sufficient design expertise to examine local distinctiveness as part of their design process.
General comment re: design	There is a priority for promoting home working within the NP, however this is not reflected or discussed within design policy H3. We recognise that the issue is highlighted in policy BE3 of the NP, however this only considers home working in context of retrospectively adding to existing dwellings. Addressing homeworking at the design stage of new dwellings is likely to result in better outcomes than retrospectively adding such accommodation to these new dwellings in the future. NP wish to consider whether adding something about also supporting development of new homes that are designed to accommodate home working into text of H3.

Environment and Greenspace

Policy ENV 1: Local Green Spaces (p27)	<p>A rewording of the policy may be necessary as it needs to designate first and then apply the policy.</p> <p>The following areas identified on Figure 4 are designated as local greenspaces:</p> <p>a) Noticeboard field, Wartnaby (W35) b) Front paddock, Wartnaby (W36) c) Church field, Ab Kettleby (A59) d) Field south of church, Ab Kettleby (A63) e) Brown’s Hill Nature Reserve, Holwell (P53/P55)</p> <p>Development proposals that would result in the loss of, or have an adverse effect on any of these areas will not be permitted other than in very special circumstances.</p>
Green Spaces (p27)	<p>A59 & A63, P53 & P55 and potentially W35 – Could these be classed as an extensive tract of land if both designated as Local Green Space?</p> <p>There is a risk depending on the Examiner’s interpretation of the NPPF. Please see page 26 of the <i>Report of the Examiner into the Frisby on the Wreake Neighbourhood Plan</i> as a previous reference to a potentially similar matter. The report also highlights that these areas are already protected with the Limits to Development Policy.</p>
Important Open Spaces (para 2 p30)	<p>“<i>Ab Kettleby seems to have been erroneously omitted from the 2015 consultation</i>”. Please remove, Ab Kettleby was included within the MBC Areas of Separation, Settlement Fringe Sensitivity and Local Green Space Study 2015 (Part C, pg. 226)</p>
Biodiversity and Wildlife Corridors (p34)	<p>Replace reference to Submission Local Plan with the adopted Local Plan.</p>
Policy ENV4 & ENV5 (p35)	<p>Policy ENV4 does not seem to add anything to policy EN2 of the MBC Local Plan. Could these two policies be amalgamated into one?</p>
Policy ENV6 (p38)	<p>Are numbers 1-10 part of the policy or just examples of local assets? If they are not part of the policy, it may be best to locate the list before the policy to make sure this is clear.</p>
Renewable energy generation infrastructure (pg43)	<p>Second part of the page lists 4 bullet points – these are then repeated on pg44.</p>

Employment & Infrastructure

7.4 Community facilities (p.46)	<i>“community is charged for its use at levels that many of the older members of the community resent as they paid for and in many cases provided their labour free of charge to build it.”</i> – What are you trying to achieve with this information?
Policy CFA2 (p52)	The wording of the policy specifically c) and d) is questionable as I am concerned to how they will be measured with the words used of “adequately” and “appropriate” leads the policy to be unclear.
7.5 Transport – (p53)	The inclusion of air travel in the NP seems excessive at the scale of the plan more appropriate in strategic plans than in the NDP.
Traffic management – our small lanes (p54-55)	This whole section is very wordy and could be cut down significantly or as with other NPs placed into a table format or bullet point list. Maybe the inclusion of images would give a better visualisation of which roads it relates to.
Speeding (p56)	<i>“It continues to be a problem which is likely to get worse as the volume of traffic on the A606 and those turning out onto it within the 30mph zone steadily increase.”</i> – Is this evidence based? A greater build up of traffic could reduce its speed
Policy T2 (p.58)	Clearer policies: what is meant by service new developments, what standard of path, NPPF (104, d, p.30) say that footpaths and cycle paths need to be of high quality. How will walking, cycling and riding be encouraged through what forms.
Figure 20 Existing Rights of Way – (p58)	Map is illegible
Support for new business and employment (p.60)	<i>“However, parishioners have been clear that any new employment initiatives should be small scale and sensitive to the character of the Parish.”</i> This could be seen as contrary to NPPF (83. a) which states that development plans should include all types of employment.

ESSENTIAL MATTERS

7.1. Limits to Development (p.15)	Subject to the independent examiner to consider whether the whole concept is in general conformity with the Local Plan
Windfall sites (p.22)	<i>To help protect the nature of the Village Character, development beyond the housing allocation described in H1 above will be restricted to windfall sites within the Limits to Development and will be of no greater size than two five new properties on any single site.</i> This seems to be contrary to para 4.2.17 of the Local Plan – <i>Schemes of up to about 5 dwellings for Rural Hubs may be appropriate...</i> This paragraph is also contrary to some bits of the NDP content – 7.2 Housing – Overview – [...] <i>Given the small size of Wartnaby and Holwell the preferred mode of expansion will be through the development of small windfall sites suitable to a countryside location</i> (and therefore out of the LTD). It is suggested to amend the threshold and to remove the restriction to areas within the LTD (does not seem to be practical for Development Management purposes).
Policy S1. Limits to development (p.17)	As a consequence of my point above [...] <i>Land outside the defined Limits to Development will be treated as open countryside, where development will be carefully controlled in line with local and national strategic policies alongside other policies in this Plan</i> – this will help the policy to include any potential windfall site as stated above
Policy H1, site B	The policy asks for 33% affordable housing provision. The whole plan viability evidence for the Local Plan has identified that a minimum 25% affordable housing is viable for Ab Kettleby. Therefore, although we support a higher than 25% affordable housing, it may prove difficult to secure 33% for this site.
Design standards – policy H4 Housing Design–p21-22. d)	Please see the whole reasoning in the main table. I would suggest that consideration is given to change the wording of this policy to remove the reference to 50m and refocus on the consideration of light pollution as a whole as the consequence of any development. An example of alternatively wording could be, “d) Development proposals should consider potential light pollution and how it can be limited, particular in areas with dark skies. Where externally visible lighting is essential, it should be designed in such a way that nuisance is reduced and the effect on the night sky in the countryside minimised.

	Security lighting should be appropriate, unobtrusive and energy efficient". You may wish to add some explanatory text about the amount of dark skies in the NP area and why these are worth preserving to highlight the issue as well.
Design standards – policy H4 Housing Design–p21-22. e)	Please see the whole reasoning in the main table. Consideration may need to be made to the wording of this to remove specific reference to 7kw cabling. However, this then becomes a repetition of Melton Local Plan policy EN9 (8) (Charging points for electric cars).
Policy ENV 1: Local Green Spaces (p27)	A rewording of the policy may be necessary as it needs to designate first and then apply the policy: The following areas identified on Figure 4 are designated as local greenspaces: a) Noticeboard field, Wartnaby (W35) b) Front paddock, Wartnaby (W36) c) Church field, Ab Kettleby (A59) d) Field south of church, Ab Kettleby (A63) e) Brown’s Hill Nature Reserve, Holwell (P53/P55) Development proposals that would result in the loss of, or have an adverse effect on any of these areas will not be permitted other than in very special circumstances.
Green Spaces (p27)	A59 & A63, P53 & P55 and potentially W35 – Could these be classed as an extensive tract of land if both designated as Local Green Space? There is a risk depending on the Examiner’s interpretation of the NPPF. Please see page 26 of the <i>Report of the Examiner into the Frisby on the Wreake Neighbourhood Plan</i> as a previous reference to a potentially similar matter. The report also highlights that these areas are already protected with the Limits to Development Policy.

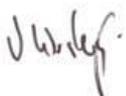
SEA

The SEA Screening is complete, with all three statutory consultees concurring with Melton Borough Council’s Screening Report of 22nd January, 2019 that a full SEA is not required.

The community are congratulated for making considerable progress on the Neighbourhood Plan. Melton Borough Council again welcomes the opportunity for continued communication on the inter-relationships 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

Head of Regulatory Services
Melton Borough Council

APPENDIX A - REGULATION 14 CONSULATION. MBC RESPONSE

Direct Line: 01664502338
Please ask for: Jim Worley
e-mail: planningpolicy@melton.gov.uk
Date: 21st June 2018

Dear Neighbourhood Plan Group

RE: Ab Kettleby Neighbourhood Plan 2018 - Pre-submission Consultation

Thank you for sending the pre-submission Ab Kettleby Neighbourhood Plan 2018 to Melton Borough Council for comment.

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 Neighbourhood Plan Group / Parish Council in ensuring a submission version Neighbourhood Plan is developed that will withstand examination and any possible legal challenge.

Melton Borough Council's response is based on the pre-submission consultation documents provided via email to James Beverley on 11th May, 2018. 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).

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

To ease your understanding of our comments and its relation with your Draft we have structured this letter to follow your draft. It is important to note that in the past months there has been significant 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.

The underlined words are suggested to be added, whilst the strike-through words are suggested to be deleted, apart from other suggestions.

1. Under section , page 5, para no. 6 and 7
Once any comments received through the pre-submission consultation process have been taken on board and the Neighbourhood Plan amended where appropriate, it will be submitted to Melton Borough Council who will consult on it further and arrange for an independent examiner to consider and prepare a report on whether it can be 'made' [it is suggested to look up the regulations/guidance for correct wording here] before passing it through for a referendum of everyone on the electoral roll in the Parish who will be invited to vote on whether or not they support it. At least 50% of those voting must vote yes for it to become a 'Made' statutory planning document.
2. Under section , page 5, para no. 6 and 7
After being 'Made', each time a planning decision has to be taken by Melton Borough Council, or any other body, they will be required to refer to the Neighbourhood Plan (alongside the Borough's own ~~Core Strategy 2009 to 2026~~ Melton Local Plan and other relevant documents) and check whether the proposed development is in accordance with the policies the community has developed.
3. Under Section 2, page 6, third paragraph
For Ab Kettleby, the most significant planning document is the emerging Melton Local Plan 2011-2036 ~~Melton Core Strategy 2009–2026~~. This sets out the strategic planning framework for the Borough's future development through that period. *Please note that the Melton Local Plan is likely to be adopted before the ABK NP gets to examination.*
The Council also understands that the Government intends to publish a revised NPPF this summer.
4. Page 6, last paragraph
This Plan and the policies it contains are consistent with the NPPF, emerging Melton Local Plan ~~Melton Core Strategy~~ and relevant EU legislation. Full details of how the Plan complies with these legislative requirements are set out in the Basic Conditions Statement (to be made available with the Submission version of this Neighbourhood Plan as Appendix 2). The Neighbourhood Plan is therefore intended to support the strategic policies contained in the emerging Melton Local Plan ~~Melton Core Strategy and the Submission Version Local Plan~~ and the requirements of the NPPF. It works in conjunction with these requirements to give additional, more detailed, Parish-wide specific policies that help to clarify and achieve the community's vision.
..... *All references to Melton Core Strategy should be replaced with emerging Melton Local Plan.*
5. Section 7.1
Needs correct MLP references – see above
6. Limits to Development
The Submission Version of the Local Plan removes the existing village envelopes contained within [saved policies of the MLP? – check] ~~the Adopted~~

~~Core Strategy~~ and the community has indicated its desire to maintain the settlement boundary around the built-up area of Ab Kettleby.

7. Section 7.2 – Housing

- Inclusion of MLP ABK1 welcomed.
- Comment re identification of a reserve site (in Figure 3). – is this one of the SHLAA sites, is the land available? If it was assessed in our assessments, we can check that it is suitable , available and deliverable/developable or highlight any problems we identified it is not any of these. We can look into this further.
- The reserve site (part of the Housing Allocation policies) will be activated if there is a ‘substantial shortfall’ because the allocation cannot deliver as much as anticipated, or because there is additional requirement in a document that replaces MLP. The NP further mentions that if the Local Plan is replaced, this reserve site would be an option, it would help to point here that this may also be if there is an additional requirement through the Strategic Growth Plan.

8. Fig 2

All maps need the OS copyright for any OS layer or any of the layers is based on a OS basemap. If the information is taken from us, it will be useful to include copyright. For info, these are:

Melton Borough Council License Number 100019651 [2018].

Contains Ordnance Survey data © Crown copyright and database rights [2018].

9. Section 7.2 Housing

- On the whole, the relevant sections on housing look good. However, it is recommended to alter the wording slightly on page 18 to acknowledge that bungalows are also a good housing option for people with restricted mobility as well as elderly people.
- For the reserve site (site B) of 12 homes – the NP states that 4 should be affordable housing. This equates to 33%. It is recommended that this is stated as a % rather than a number in case the overall number of dwellings on the site changes.
- The NP states that of the 4 affordable dwellings, 2 should be shared ownership. This is very specific and it may be found, at the time of seeking planning permission, that this type of housing is not needed and instead another form of intermediate housing. It may also be found that there is not a registered provider who is able to develop these. In the current NPPF, it uses the umbrella term of ‘intermediate housing’ and it is recommended that this is used instead and again a % is used instead of a number.
- Housing Policy H2 is fine.

10. Policy H4 housing design

Council is planning to prepare a Design Supplementary Planning Document and intends to complement existing and emerging NP and LP design policies.

11. Section 7.3

Page 26, 2nd paragraph about the nine criteria in NPPF for site scoring and evaluation for Local Green Spaces, reference to NPPF paragraph would help here. Also it would help to refer to MBC's Area of Separation, Settlement Fringe Sensitivity Study.

12. Policy ENV 10 – it would help to add the words 'subject to viability' to the policy.
13. 7.4 Community facilities
CFA1 – may want to consider whether some of this policy is duplicating what is in Local Plan Policy C7.
14. Policy T1 – and others similar – it would help to seek views of Leicestershire County Council as Lead Highway Authority as well as MBC as Local Planning Authority.
15. Section 7.6 Businesses and employment
Policy BE1 would bring into local effect the provisions of MLP Policy EC3.
16. Policy BE2 - it is not clear if the criteria are all intended to be 'and' clauses or 'or' clauses. Furthermore, Local Plan Policy EC4 covers very similar ground for the Borough as a whole. It is suggested that Policy Be2 be reviewed to ensure that it complements Policy EC4. As written, the clause that limits new employment uses to within the planned limits to development is not in conformity with the Local Plan Policy EC4, as it is more locationally restrictive.
17. Policy BE4 – farm diversification. Local plan policies EC4 and D1 taken together cover many of the elements of the proposed ABK NP Policy BE4 and so do not need repeating in the NP.
18. Policy BE5 – tourism – This policy is more restrictive locationally than Policy EC8 of the MLP (with a proposed amendment through MM14 of the Schedule of Proposed Main Modifications) which deals with sustainable tourism, and so is not in general conformity with it. It is suggested that Policy BE5 be reviewed to ensure that it aligns with Policy EC8. Policy EC8 would permit tourism developments away from existing settlements if the location is accessible. MM14 sets out the test that needs to be satisfied for larger scale tourism proposals to be permitted in the countryside.
19. Policy BE5 – tourism - are the criteria 'and's or 'or's?
20. Policy BE5(c) - the wordingsignificantly adversely affect.... is suggested, because some tourists will inevitably come in cars, and cannot avoid making some use of roads and water and sewerage systems.
21. Section 8 Monitoring and review – noted and supported.
22. Overall, it would help to have paragraph numbers in the whole document for example, 1.1, 2.1 for ease of referencing.

The community are congratulated for making considerable progress on the draft 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, as stated previously we are more than happy to meet with you at your convenience to discuss any matters in more detail so that together we can progress towards a Neighbourhood Plan that will stand the test of examination and responds accordingly to the community's desire for suitable, sustainable development.