

Neighbourhood Planning Response – Plan-it X for Asfordby Parish Council

Thank you for forwarding the Council's latest thinking on Neighbourhood/Local Plan alignment. I offer the following observations on the following documents on behalf of Asfordby Parish Council.

Background

On 5 February 2018, the decision of Melton Borough Council to refer the Asfordby Neighbourhood Plan to referendum was quashed. The referendum held on 28 September 2018 was also quashed.

On 8 March 2018, Asfordby Parish Council resolved to withdraw the Asfordby Neighbourhood Plan. However, the Parish Council is meeting on 15 March with a view to re-submitting its Neighbourhood Plan. It follows that the Asfordby Neighbourhood Plan will soon be returning to examination and it is likely that it will be at post-examination stage by the time the Melton Local Plan is adopted.

M1 - 1 - MBC Neighbourhood Plan + Additional Housing Sites (updated 23-02-18)

The schedule is incomplete as it does not include the Asfordby Parish Neighbourhood Plan allocation off Crompton Road/Melton Road, Asfordby Hill (APNP Policy A15, see attached note). The site is the subject of an outline planning application for the development of 14 dwellings (Ref: 16/00907/OUT) with a resolution to permit subject to the completion of a S106 Agreement.

M1 - 2 - MBC - NP LP Alignment

We have several comments on this document:

General

This document focuses on the lack of alignment between housing allocations in the emerging Melton Local Plan and the Borough's neighbourhood plans. While we appreciate that this is a major concern, the lack of local/neighbourhood plan alignment runs deeper and the document fails to properly address:

1. MLP paragraph 1.9.4- it is quite clear that fewer of MLP policies are truly strategic in nature than set out in this paragraph. Indeed this is accepted by M1 – 2 which concludes that the MLP should defer to post examination NP's. It therefore follows that MBC accepts that the sites allocated by MLP Policy C1 are not 'strategic';
2. The designation of Village Envelopes through the APNP and other neighbourhood plans in the Borough;
3. The MLP Policies Map incorrectly shows the extent of Asfordby Business Park by including agricultural land to the north-west of the site;
4. MLP Policy EC3 generally supports 'Town Centre' developments in Asfordby regardless of location. APNP Policy A20 focusses such uses at Bradgate Lane Shops;
5. MLP Policy EN4 fails to identify land between Asfordby Hill and Asfordby Valley as an Area of Separation;
6. Inconsistencies in the identification of Local Green Spaces; and
7. The reasonable alternative approach raised by Examination participants whereby MLP housing allocations should be treated as reserve sites to be brought forward should NP sites not be delivered.

Approach 2: Local Plan sits alongside NDP's

There is a strange reference to the Asfordby NP in this section which states 'Local Plan sites are allocated outside the limits to development in an area designated as an 'Area of Separation' in the Neighbourhood Plan'. We are only aware of Local Plan sites (ASFH1 and ASFH2) allocated in Areas of Separation designated by the MLP. The conflict between MLP sites ASFH1 and ASFH2 and MLP Policy EN4 (plus Historic England concerns) supports our contention that these MLP housing allocations are inappropriate.

Approach 3: Local Plan to defer to post examination NP's

Paragraph 3: It is unclear why sites promoted through NPs are any less deliverable than those promoted through the MLP. Indeed, as the NP sites have cleared examination stage, arguably they are more deliverable than those in the MLP. It perhaps also demonstrates that the MLP SHLAA process has not comprehensively considered all site sources especially given that MBC has been aware of proposed NP sites for many months, or even years.

Approach 4: Local Plan to defer to NP's whenever they are made (regardless of current status)

Approach 4 is largely irrelevant as it only differs to Approach 3 in relation to NPs that have not yet reached examination stage. In these cases, PPG (Paragraph: 044 Reference ID: 41-044-20160519) makes it clear that under certain circumstances NPs can allocate additional or alternative sites to those in a Local Plan. Approach 4 is not incompatible with the PPG paragraph 009 (Reference ID: 41-009-20160211) as Policy C1 is not a strategic policy.

Conclusion

Asfordby Parish Council supports the M1 – 2 conclusion that the MLP should defer to post examination NP's. However, M1 – 2 fails to deliver on that conclusion. In particular with regard to the Asfordby Neighbourhood Plan, M1 – 2 states: '*No change to submitted LP. Insufficient NP evidence of*

deliverability and recent quashing means the NP is now back to Examination stage and there is uncertainty whether the Neighbourhood Plan will remain in its current form or progress with different content (including site selection). Furthermore there is difficulty related to the anticipated timetable for its progress.' The Asfordby Parish Neighbourhood Plan is expected to be submitted imminently with exactly the same housing allocations as previous. Once submitted, the timetable for the ongoing stages of Neighbourhood Plan preparation are largely dependent upon the willingness of MBC to expedite matters. In this regard PPG paragraph 022 (Reference ID: 41-022-20150209) requires MBC to '*fulfil its duties and take decisions as soon as possible, and within statutory time periods where these apply*'. With regard to deliverability, Asfordby Neighbourhood Plan allocations at land between Regency Road, Asfordby and the bypass (Policy A12) and land off Crompton Road/Melton Road, Asfordby Hill (Policy A15 (see attached)) are already subject to resolutions by MBC Planning Committee to permit (subject to S106). During the Examination Hearing Session, Asfordby Parish Council provided evidence to demonstrate the deliverability of the development of up to 100 dwellings as part of the development of the Holwell Business Park (NP Policy A27).

It is clear that M1 – 2 fails to properly address all the issues relating to the lack of alignment between the MLP and Neighbourhood Plans. MLP paragraph 1.9.4, subject to the proposed modifications, still does not reflect PPG paragraph 009 (Reference ID: 41-009-20160211). The principal, that the MLP should defer to post examination NP's is supported but this should apply to all MLP policies including those concerning Local Green Spaces, Areas of Separation etc. Asfordby Parish Council are keen to ensure that MLP allocations ASFH1 and ASFH2 are deleted in deference to

the development of up to 100 dwellings as part of the development of the Holwell Business Park (NP Policy A27).

Asfordby Parish Neighbourhood Plan Policy A15 (see attached) allocates land off Crompton Road/Melton Road, Asfordby Hill for the development of around 14 dwellings. The site has not been considered as a potential housing allocation by the Melton Local Plan. The allocated site is currently the subject of an outline planning application for the development of 14 dwellings with associated vehicular access and public open space (Ref: 16/00907/OUT). At its meeting of 27 July 2017, Melton Borough Council's Planning Committee resolved to permit the application subject to the completion of a S106 Agreement.

POLICY A15: Land off Crompton Road/Melton Road, Asfordby Hill

Land is allocated for housing development at Crompton Road/Main Street, Asfordby Hill as defined on the Policies Map. Development will be supported subject to the following criteria:

- A the development provides for around 14 dwellings. At least 30% of these shall be Affordable Houses;
- B proposals shall provide for the comprehensive development of the whole of the allocated site;
- C the existing play area shall be replaced by equivalent or better provision in terms of its size, equipment and quality;
- D the only vehicular access to the site is to be from Melton Road;
- E the bus stop on Melton Road is to be retained or relocated so that is no less convenient for the residents of Asfordby Hill.

