



## MELTON LOCAL PLAN – ADDENDUM OF FOCUSED CHANGES (JULY 2017)

For official use only
Respondent Ref:
Date Received:

(PART B)

**PART B: YOUR REPRESENTATION** *(This section will need to be completed for each representation made. Please photocopy or download from the council's website Part B of the form as required.)*

**Which part of the Melton Local Plan: focused changes addendum does your representation relate to?** *(Please enter the policy number)*

FC number:  Policy number:

**Do you believe that this policy/section of the Melton Local Plan focused change is?** *(Please tick the appropriate box)*

- |                                      |     |                                     |    |                                     |
|--------------------------------------|-----|-------------------------------------|----|-------------------------------------|
| 1. Legally Compliant:                | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> |
| 2. Sound:                            | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> |
| 3. Complies with Duty to Co-operate: | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            |

*\*The considerations in relation to the Local Plan being "sound" are explained in paragraph 182 of the National Planning Policy Framework. If you have entered "No" in relation to 4(2), please go to question 5. In all other circumstances, please go to question 6*

**Do you consider that the focused change is unsound because it is not any of the following?** *(Please tick the appropriate box)*

- |                        |                          |              |                                     |              |                          |                                    |                          |
|------------------------|--------------------------|--------------|-------------------------------------|--------------|--------------------------|------------------------------------|--------------------------|
| 1. Positively Prepared | <input type="checkbox"/> | 2. Justified | <input checked="" type="checkbox"/> | 3. Effective | <input type="checkbox"/> | 4. Consistent with National Policy | <input type="checkbox"/> |
|------------------------|--------------------------|--------------|-------------------------------------|--------------|--------------------------|------------------------------------|--------------------------|

**Please give details of why you consider this focused change is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of this policy or its compliance with the Duty to Co-operate, please use this box to set out your comments.** *(Please continue onto a separate sheet if you require more space)*

Final paragraph of SS2 states 'The Council will support the preparation of Neighbourhood Plans and development proposals promoted through Neighbourhood Plans, provided that they are consistent with the strategic objectives and proposals included within this Local Plan.'

SS2 and SS3 then allocate sites within all areas of the Borough. These two policies together seek to allocate all sites across the Borough despite Neighbourhood Plans being progressed in many areas.

A key remit of Neighbourhood Plans and The Localism Act is to collect community feedback to allocate sites. No consideration has been taken as to local community wishes on site allocation. These wishes have been afforded no weight in Council considerations despite detailed fact bases being available as further evidence for the Local Plan and progress meetings with Neighbourhood plan representatives. Melton Borough Council have only considered their own desktop research and landowner and developer feedback into consideration in their proposals.

Many Neighbourhood Plans were well advanced at the start of this Focused Changes consultation with some completing Regulation 16 consultation and several more having completed Regulation 14 consultation and entering Regulation 16 consultation at a similar time to this Local Plan consultation. Melton Borough Council have commented on site allocation within their NP feedback, so are aware of Neighbourhood Plan proposals and they should not ignore the evidence base for Neighbourhood Plans in their assessment. The specific fact base for Clawson, Hose and Harby is available on the Parish Council website at [www.chhparishcouncil.co.uk](http://www.chhparishcouncil.co.uk).

Therefore this Plan is **not legally compliant or justified** as policies SS2 and SS3, attempt to remove the Neighbourhood Plan remit for allocating sites in a Neighbourhood Plan area. Melton Borough Council have not considered reasonable alternatives using all the evidence available to them and do not provide the most appropriate site allocation strategy when considered against other reasonable alternatives at a Neighbourhood Plan level.

**Please set out what change(s) you consider necessary to make the focused change legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this change will make the suggested focused change legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.** *(Please continue onto a separate sheet if you require more space)*

To be compliant with The Localism Act and positively prepared with Neighbourhood Plans, amend Policy SS2 and/or Policy C1a and C1b to include the overriding clause that 'If and when a Neighbourhood Plan has been adopted or submitted for Regulation 16 consultation, the allocation of sites in Policy C1a and C1b should be taken from the Neighbourhood Plan provided the strategic minimum housing development target plus Reserve Site contingency as defined in the Local Plan has been met by the Neighbourhood Plan across its Designated Area.'

It is suggested that any Emerging Neighbourhood Plan evidence base should be requested by the Borough Council and given weight in their allocation of sites in the Local Plan if a Neighbourhood Plan has not reached Regulation 16 consideration.

**Can your representation seeking a change be considered by written representations or do you consider it necessary to participate at the oral part of the examination?** (Please tick the appropriate box)

Written Representations

☐

Participate at the Oral Examination

☒

**If you wish to speak at the examination, please outline why you consider this to be necessary:**

For the avoidance of doubt the Parish Council wished to be involved in the EIP examination of these key local judgements at the LP EIP

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Melton Borough Resident

☐

Planning Agent/Planning Consultant

☐

Developer

☐

Utility/Service Provider

☐

Government Organisation

☐

Amenity Group

☐

Other Organisation

☐

Residents Group

☐

Business

☐

Town/Parish Council

☒

Other (Please state)

**Do you want to have further involvement in the Melton Local Plan?** (Please tick the appropriate boxes)

If you wish to be notified at the address/e-mail provided in Part A when the Melton Local Plan is submitted to the Secretary of State for Communities & Local Government

☒

If you wish to be notified at the address/e-mail provided in Part A when the Inspector's Report is available to view

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**Would you like to be kept informed of other council services? We will not share this data with another provider** (Please tick the appropriate boxes)

All council services

☐

Community

☐

Tourism & events

☐

Town Centre

☐

Benefits

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Local Plan

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Online services

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Waste and recycling

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## MELTON LOCAL PLAN – ADDENDUM OF FOCUSED CHANGES (JULY 2017)

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(PART B)

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**Which part of the Melton Local Plan: focused changes addendum does your representation relate to?** *(Please enter the policy number)*

FC number:

FC1.1

Policy number:

SS2 & SS3

**Do you believe that this policy/section of the Melton Local Plan focused change is?** *(Please tick the appropriate box)*

- |                                      |     |                                     |    |                                     |
|--------------------------------------|-----|-------------------------------------|----|-------------------------------------|
| 1. Legally Compliant:                | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            |
| 2. Sound:                            | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> |
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**Do you consider that the focused change is unsound because it is not any of the following?** *(Please tick the appropriate box)*

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The Borough Council has considered updated evidence of Objectively Assessed Need (OAN) for Housing and Employment requirements during the 25 year plan period having regard to the joint L&L HEDNA (Jan.2017), and its own commentary on this in the Towards a Housing Requirement Report (TAHR – Jan + June 2017). Focussed Change FC1.1 notes the HEDNA reduced revised annual assessment of Borough-wide housing need of 170 dwellings pa 170 new dwellings pa (x 25 years = 4,250) but, having had regard to the TAHR, has determined to keep the Housing Requirement at the Draft Plan level of 245 dwellings pa (x 25 years = 6,125).

In this PC's considered view there is inadequate justification for preferring the TAHR annual and aggregate new housing figures. The draft LP rationale is predicated on three matters: alignment of the plan's housing and economic strategy; unmet housing need from other parts of the Housing Market Area; and the role which higher housing provision – above Melton's objectively assessed housing need - can play in supporting economic growth, delivering affordable housing, and new infrastructure, including in particular the Melton Mowbray Transport Strategy.

LH+H PC's reading of the complex background evidence is that there is little objective and convincing evidence of Housing Need being required at the higher FC1.1 level. Table 88 of the HEDNA report identifies a Borough-wide Demographic Need of just 134 new homes pa, and has already included additional elements including 20 pa as an "Affordability Adjustment" and 16 pa "to support Economic Growth" to reach the 170pa figure.

Additional new housing at the 245 pa level proposed by FC1.1 is not objectively justified and will have perverse and harmful effects on the three rural villages of Long Clawson, Hose and Harby, which are situated in the more remote and sparsely populated northern outer reaches of the Borough. As such these settlements are in intrinsically less sustainable locations of the Borough where oversupply of new housing against the OAN would be unsustainable and contrary to the aims and expectations of the NPPF.

The PC has been developing its own NP (now at Regulation 16 stage) and has been keen to work positively with the Borough to meet a justified and reasonable share of housing need. But there are real environmental, traffic and infrastructural constraints in all three villages for which an over-inflated Housing Requirement is harmful and difficult to accommodate without significant further infrastructure investment. As a result, when taking account of the HEDNA OAN, the PC revised its own NP village housing needs downwards to meet the HEDNA requirement plus flexibility allowance in line with NPPF guidance. By using the inflated Borough-wide figure of 6,125 and making no adjustment to the split between Melton town and the Rural Areas (currently proposed at an overall ratio of 65:35%) FC1.1 would lead to an unsustainable overprovision of new housing in the LCH&H parish (and arguably elsewhere in other remoter rural villages).

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Amend the OAN and related Strategic Policies (and related justifying text) to reflect the composite and up-to-date HEDNA requirement of 170 new dwellings pa (4,250 in total) and make corresponding adjustments to all the plan's Housing Delivery and Site Allocation proposals. (LCH+H PC is prepared to work positively with the Council and other PCs to achieve a package of suitable detailed amendments before or during the LP Examination in Public).

If it was determined that such *pro rata* reduction in the level of new housing for Melton town would be insufficient to sustain necessary highway and other infrastructure investments, and to provide an adequate level of Affordable Housing, the PC suggests that consideration be given to amending the geographic apportionment between town and rural areas to boost the numbers of new homes in the town and reduce them further in the villages. In our view this would make for a more sustainable solution to that proposed in FC1.1 as it would focus housing provision in the most sustainable locations, help provide Affordable Housing where the need is greatest, and provide the potential for more focussed infrastructure investment via S106 or CIL.

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Written Representations

☐

Participate at the Oral Examination

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Business

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Town/Parish Council

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Other (Please state)

Do you want to have further involvement in the Melton Local Plan? (Please tick the appropriate boxes)

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☒

If you wish to be notified at the address/e-mail provided in Part A when the Inspector's Report is available to view

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Would you like to be kept informed of other council services? We will not share this data with another provider (Please tick the appropriate boxes)

All council services

☐

Community

☐

Tourism & events

☐

Town Centre

☐

Benefits

☐

Local Plan

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Online services

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Waste and recycling

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## MELTON LOCAL PLAN – ADDENDUM OF FOCUSED CHANGES (JULY 2017)

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(PART B)

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Policy SS2 describes developer contributing positively to key infrastructure and specifically traffic relief within the town. However there is no similar statement for Service Centres and Rural Hubs. In fact there is a disregard to basic infrastructure development in rural communities throughout the Local Plan.

Evidence of basic infrastructure development needed within the three Service Centres of Long Clawson, Hose and Harby, to ensure both the continued sustainability of these communities and the suitability for the proposed increased development, has been provided by the Parish Council via specific feedback on sites and in the pre submission consultation of the Draft Local Plan (Nov 16). There has also been a detailed evidence document produced by the residents of Long Clawson and submitted to the Borough Council through the Local Plan process and separately to key officers and Councillors. All of these representations have been ignored in provision of infrastructure and therefore this Plan is **unsound and not effective**.

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Introduce the following to Policy SS2 at the end of the paragraph on Service Centre and Rural Hubs- 'Development will be expected to contribute positively to the provision of key infrastructure to support continued sustainability of rural communities.'

Introduce new Policy SS7 Sustainable Rural Communities –Infrastructure- which details the basic infrastructure elements required to maintain sustainable Service Centres and Rural Hubs where developer positive support is expected. This list should come from Neighbourhood Plan work, Parish Council and community feedback as well as statutory bodies.



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Tourism & events

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Town Centre

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Benefits

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Waste and recycling

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The delivery of housing in the rural centres and specifically in Harby, Hose and Long Clawson is front loaded in the plan. It is the Parish Council's view that development of the numbers suggested in the HEDNA report and this Plan should be taken in the villages over the whole of the planning period. However, the detailed village site assessments and the Five Year Land Supply Report and Housing Trajectory Position Table C which supports the housing allocation policies show that whole of the allocated site development in this Parish and more generally all the rural hubs is assumed in the next 5-7 years. This does not allow the villages to absorb changes over the whole period of the plan as suggested by the community.

It is the Parish Council view that this rate of development is **unsustainable** across our Parish and so the Policy is **unsound and not positively prepared**.

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Revise the delivery timetable to spread the allocated site development schedule across the Parish over the remaining 19 year period of the Plan with the developments staggered across the Parish and each village or sites being developed over the whole of the Plan period and hence more slowly than in the current timetable.

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FC number:

FC4

Policy number:

C1A and C1B

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The renaming of sites using site codes between the Draft Melton Local Plan (Nov2016) and this Focussed Change, has led to confusion in community consultation as evidenced at the event held in Long Clawson on 1<sup>st</sup> August 2017. Many residents failed to grasp the sites had been removed, merged, changed or replaced with new sites with the same names. Examples of these in our Parish are:-

- HAR3, HOS2 and LONG2 have all been replaced with alternative sites in the villages,
- HAR4 merged with HAR5 and HAR5 replaced.

The Focussed Change is **unsound** as effective consultation with residents has not been possible and is therefore **not justified** as the local community has been confused and disenfranchised to participate.

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Full redraft of the plan required maintaining original site codes and introducing new ones if required or specific detailed consultation is required in each village impacted by the changes

**Can your representation seeking a change be considered by written representations or do you consider it necessary to participate at the oral part of the examination?** *(Please tick the appropriate box)*

Written Representations

☐

Participate at the Oral Examination

☒

**If you wish to speak at the examination, please outline why you consider this to be necessary:**



For the avoidance of doubt the Parish Council wished to be involved in the EIP examination of these key local judgements at the LP EIP

**Please note:** The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

**To help us collate the responses to this consultation, we would be grateful if you could tell us which category best describes who you are representing (Please tick the appropriate box)**

Melton Borough Resident ☐

Planning Agent/Planning Consultant ☐

Developer ☐

Utility/Service Provider ☐

Government Organisation ☐

Amenity Group ☐

Other Organisation ☐

Residents Group ☐

Business ☐

Town/Parish Council ☒

Other (Please state)

**Do you want to have further involvement in the Melton Local Plan? (Please tick the appropriate boxes)**

If you wish to be notified at the address/e-mail provided in Part A when the Melton Local Plan is submitted to the Secretary of State for Communities & Local Government

☒

If you wish to be notified at the address/e-mail provided in Part A when the Inspector's Report is available to view

☒

If you wish to be notified at the address/e-mail provided in Part A when the Melton Local Plan is adopted

☒

If you/your organisation wish to be included in future consultations on the Melton Local Plan

☒

If you/your organisation **do not** wish to be included in future consultations on the Melton Local Plan

☐

**Thank you for taking the time to submit representations on the Melton Local Plan: Addendum of Focused Changes 2017. It should be noted that representations cannot be treated as confidential.**

**Would you like to be kept informed of other council services? We will not share this data with another provider (Please tick the appropriate boxes)**

All council services ☐

Community ☐

Tourism & events ☐

Town Centre ☐

Benefits ☐

Local Plan ☐

Online services ☐

Waste and recycling ☐



**MELTON LOCAL PLAN – ADDENDUM OF FOCUSED CHANGES  
(JULY 2017)**

For official use only
<b>Respondent Ref:</b>
<b>Date Received:</b>

## FC4 HOUSING SITE ALLOCATIONS COMMENTS

The following questions will relate to housing site allocations. Please only use 1 form for each site you wish to submit a comment on. You may copy this page for additional site representations.

Please note: site references may have changed since the previous Local Plan edition, so please use this document to quote any references to sites:

Table 1: Schedule and Summary of the proposed Focused Changes FC4: Housing site allocations, reserve sites and site specific policies				
<b>FC4.1</b>	Section 5.4 Policy C1(A) Policy C1(B)	Reflecting and referencing the findings on suitability, sustainability, site capacity, availability and deliverability, which are set out in updated site and sustainability assessment work. Affects the reasoned justification and policy on housing allocations overall and the associated site specific policies and preamble. Includes deletions, additions, revised site boundaries and capacities, and some recategorisation.	<ul style="list-style-type: none"> <li>- 11 site allocations deleted</li> <li>- 3 reserve sites deleted</li> <li>- 16 site allocation boundaries amended</li> <li>- 22 allocated sites with capacity changes</li> <li>- 1 reserve site with a capacity change</li> <li>- 8 new site allocations, and 2 extended existing sites</li> <li>- 2 new reserve sites</li> <li>- 14 allocated sites and 2 reserve sites renumbered.</li> </ul>	
<b>FC4.2</b>	Appendix 1	Amended site specific policies. New reasoned justification and site specific policy for Scalford and Great Dalby.	<ul style="list-style-type: none"> <li>- Reflects FC4.1 above.</li> <li>- Amended criteria setting out development conditions for some site specific policies.</li> </ul>	

### SITE SETTLEMENT *(Please select the site that you interested in (additional sites will need to be entered on another form))*

#### SITE

Ab Kettleby	<input type="checkbox"/>	Asfordby	<input type="checkbox"/>	Melton Mowbray	<input type="checkbox"/>
Asfordby Hill	<input type="checkbox"/>	Croxton Kerrial	<input type="checkbox"/>	Old Dalby	<input type="checkbox"/>
Bottesford	<input type="checkbox"/>	Easthorpe	<input type="checkbox"/>	Scalford	<input type="checkbox"/>
Frisby	<input type="checkbox"/>	Harby	<input checked="" type="checkbox"/>	Somerby	<input type="checkbox"/>
Gaddebsy	<input type="checkbox"/>	Hose	<input type="checkbox"/>	Stathern	<input type="checkbox"/>
Great Dalby	<input type="checkbox"/>	Long Clawson	<input type="checkbox"/>	Thorpe Arnold	<input type="checkbox"/>
		Wymondham	<input type="checkbox"/>	Waltham	<input type="checkbox"/>

PLEASE INDICATE THE SITE REFERENCE HERE (If you wish to comment on the approach or policy as a whole please do so in the boxes below):

#### Do you believe that this policy/section of the Melton Local Plan focused change is? *(Please tick the appropriate box)*

- |                                      |     |                                     |    |                                     |
|--------------------------------------|-----|-------------------------------------|----|-------------------------------------|
| 1. Legally Compliant:                | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            |
| 2. Sound:                            | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> |
| 3. Complies with Duty to Co-operate: | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            |

1. Do you consider that the focused change is unsound because it is not any of the following? (Please tick the appropriate box)

1) Positively Prepared ☐

2) Justified ☒

3) Effective ☒

4) Consistent with National Policy ☒

Please give details of why you consider this focused change is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of this policy or its compliance with the Duty to Co-operate, please use this box to set out your comments. (Please continue onto a separate sheet if you require more space)

LC,H+H Parish Council (PC) has worked in co-operation with MBC on a draft Neighbourhood Plan (NP) in a positive attempt to meet local housing need in the spirit of the NPPF. At Aug 2017 the NP was at Regulation 16 stage. The Draft Local Plan Nov'16 categorises Harby as a Service Centre and proposes, in Table 7, that its Revised residual Requirement (to allow for redistribution from other rural settlements unable to meet their own requirement) be 98 new homes.

However, on sites along the northern side of Colston Lane, Harby, in the last 12 months, (ie. during the present Local Plan and NP making processes), two significant outline planning permissions were granted (the first on appeal) which together have the potential to provide some 103 new homes. The recent grant of permissions in advance of the completion of both LP and NP forward planning processes, goes against Core Planning Principle 1 of NPPF paragraph 17 (*"that planning should be genuinely plan-led, empowering local people to shape their surroundings"*). However, the PC now has no alternative but to accept that, while in its view premature, the two application decisions have been made and must stand as commitments. Against that background Focussed Change FC4.1 includes various changes to the preferred housing allocation sites.

The PC has considered these proposed changes, as they relate to Harby Allocation and Reserve sites, and wishes to make 3 inter-related objections concerning housing over-provision, noting that, in terms of meeting OAN housing needs, the village already has considerable excess committed provision *"in the pipeline"* for well beyond the plan period. A total of up to 139 homes are permitted and/or allocated against the LP's requirement of 98 new homes.

The specific objections are as follows:

**(A) HAR6 (ex Millway site, Colston Lane (North) now proposed to be renumbered as HAR3)**

FC4.1 would 'promote' LP Draft site from a Reserved Site status to an Allocation site. In light of the comments above, the PC accepts that the changed status of the site now accurately reflects the decision of the Planning Inspector who granted outline planning permission for an indicative redevelopment scheme showing 53 homes in January 2017. As such the PC supports this revised site status.

However, at the Appeal Hearing the PC had supported MBC's decision to refuse that proposal, in part because the PC considered that the number of homes and density would be intrusive and inappropriate in this rural out-of-village, fringe location. The PC notes that the Inspector's *"on balance"* decision to allow permission in large measure was because of the brownfield and unsightly derelict state of the long-term redundant former dairy food manufacturing plant, and the combined housing and environmental benefit that would result, notwithstanding the site's out-of-village peripheral location. Against that background the PC now objects to MBC's Appendix 1 to FC4.1 in which pp. 52 and 53 proposes an extension of the site boundary beyond that in the indicative layout which had informed the Inspector's *"on balance"* appeal conclusions, and which was the *de facto* Reserve site boundary shown in the November '16 Draft LP. The now proposed outward extension of the site's north western boundary across open greenfield land towards and right up to the neighbouring Grantham Canal, would fit with the red line planning application boundary. However, it would be likely to bring pressure to increase the numbers of new houses across the enlarged site contrary to the aims of successive pre-planning discussions with both the Borough and Parish Councils. In the PC's view such additional development would be more visually intrusive within the surrounding open countryside as a suburban extension in a peripheral location far from the village centre.

This part of the village has been assessed in MBC's Settlement Fringe Study, Part 2, Aug'16 (MBC/LC3c pages 139-141) as having a Medium Sensitivity to residential development. The study's findings for Harby LCZ5 conclude that:

*Overall landscape sensitivity of this LCZ to residential development is medium due to the well integrated and defined settlement edge associated with the Grantham Canal that in turn contributes to the enclosed visual character that has low sensitivity to changes. Elements of this LCZ including the intact and historic field pattern are sensitive to residential development. The contained nature and little topographic variation of this LCZ reduces the sensitivity.*

However, contrary to the assertion in the final sentence of the above quotation, the subject of the proposed boundary extension starts from land on higher ground, and in fact slopes down about 7 metres from the level of the derelict factory buildings towards the tree lined edge of the canal. (As well as being a popular leisure facility, the canal also serves as a significant wildlife corridor linking to a SSSI a little further along the canal on the far side of Langar Lane to the north east. In its Design Code proposals the Council also refers to the canal's role as a wildlife corridor.) The development of this open, and as yet previously undeveloped, land would be clearly visible and intrusive from the public towpath and cycle route on the far western side of the canal, and in more distant public views from Langar Lane to the north. Given the already demonstrated generous supply of housing in the village, significantly above the requirements of the Draft LP, there is no outweighing evidence that would support the additional visual harm likely to result from the further extension of the village's built form in such a peripheral and visually sensitive location.

As such the PC considers that this particular detail of FC4.1 is unsound since it has not been justified as the most appropriate local strategy by consistent and convincing evidence of need and environmental impact. Consequently, in the PC's view, it would be contrary to NPPF paras 109, 110, 113 and 114-118 relating to conserving and enhancing the natural environment, including the landscape qualities of rural areas, and planning positively for the creation, protection and enhancement of networks of biodiversity and green infrastructure.

**(B) HAR4 & 5 (Sherbrooke H. & the Garden Studio, Colston Lane (North) – now proposed as HAR4)**

FC4.1 also includes the re-numbered Allocation Site **HAR4** located on the north side of Colston Lane between new HAR3 (see above) and the existing north-western edge of the village. The recent outline planning permission on the site was for 50 dwellings. Since that permission was granted, FC4.1 now proposes that the site capacity should be increased to 61. The PC has been unable to trace any considered evidence of why there should be such an increase in potential housing capacity. However, the density of 30 dph used as a 'rule of thumb' for all the LP's housing site capacity estimates, is considerably above the average density for Harby village and the other two rural villages in the parish. Both the Borough's and the NP's proposed Design Codes for the site anticipate that the site will be well landscaped to help it blend into its rural setting; additional houses would make the provision of such landscaping and incidental open space within the development more difficult.

Moreover, given the already demonstrated generous supply of housing in the village, significantly above the requirements of the Draft LP, there is no positive evidence to show why the higher number would be a positive outweighing benefit in this mainly greenfield location. In these circumstances there has not been a convincing justification of the proposed increased capacity, and hence the PC considers this part of the FC4.1 to be unsound. As such the increase would be contrary to NPPF paras 56 - 61 Requiring Good Design which responds positively to local character and identity, and to paras 109, 110 and 113 relating to conserving and enhancing the natural environment, including the landscape qualities of rural areas.

**(C) HAR5 RESERVE (land South of Colston Lane)**

Unlike the two above sites (new HAR 3 and HAR4) the FC4.1 this newly proposed Reserve Site is located on visually more open land on the south side of Colston Lane, which does not physically adjoin the existing built up area. The land lies in LCZ5, Harby Southwest, to which reference is made in pages 137-139 of MBC's Settlement Fringe Study, Part 2, Aug'16 (MBC/LC3c). In this evidence it is assessed as having a Medium Sensitivity to residential development. However, unlike a small, undeveloped but enclosed paddock to the east, the proposed Reserve Site is both outside the established treed boundaries beyond the village edge; and, if developed would clearly be visible across undulating pasture land in views on the approach to the village from the south along Hose Lane, both aspects specifically noted as qualifying factors in the Study's Landscape Assessment. The proposed Reserve Site can also be viewed when approaching the village along Colston Lane from the north west. From here it is seen not only as visibly separate from the existing village built up area, but also as the first part of a highly attractive vista of undulating open pastoral landscape leading the eye towards the Wolds Escarpment some 2km to the south and southwest. In the PC's judgment further housing development here would be visually prominent and demonstrably harm the open and tranquil landscaped setting of the village.

Given the already demonstrated generous supply of housing in the village, significantly above the requirements of the Draft LP, there is no positive evidence to show why the higher number would be a positive outweighing benefit in this greenfield location. In these circumstances there has not been a convincing justification of the proposed increased capacity and hence the PC considers this part of the FC4.1 to be unsound. As such the increase would be contrary to 56 - 61 Requiring Good Design which responds positively to local character and identity, and to NPPF paras 109, 110 and 113 relating to conserving and enhancing the natural environment, including the landscape qualities of rural areas.

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In the light of the above considerations the PC would respectfully request the examining Inspector to:

- (A) Reduce the amended HAR3 Allocation Site boundary to that shown in the Nov 2016 Draft Plan;
- (B) For Allocation Site HAR4, edit out the increased capacity estimate of 61 and revert back to the combined total of 50 as shown in the Nov 2016 Draft Plan, and make any necessary adjustments to totals elsewhere in the Plan's Housing policy tables and text;
- (C) Delete the proposed HAR5 reserve site and make any consequential policy and text wording changes

Can your representation seeking a change be considered by written representations or do you consider it necessary to participate at the oral part of the examination? (Please tick the appropriate box)

Written Representations

☐

Participate at the Oral Examination

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Other Organisation	<input type="checkbox"/>	Residents Group	<input type="checkbox"/>
Business	<input type="checkbox"/>	Town/Parish Council	<input checked="" type="checkbox"/>
Other (Please state)	<input type="text"/>		

**Do you want to have further involvement in the Melton Local Plan?** (Please tick the appropriate boxes)

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If you wish to be notified at the address/e-mail provided in Part A when the Inspector's Report is available to view	<input checked="" type="checkbox"/>
If you wish to be notified at the address/e-mail provided in Part A when the Melton Local Plan is adopted	<input checked="" type="checkbox"/>
If you/your organisation wish to be included in future consultations on the Melton Local Plan	<input checked="" type="checkbox"/>
If you/your organisation <b>do not</b> wish to be included in future consultations on the Melton Local Plan	<input type="checkbox"/>

**Thank you for taking the time to submit representations on the Melton Local Plan: Addendum of Focused Changes 2017. It should be noted that representations cannot be treated as confidential.**

**Would you like to be kept informed of other council services?** We will not share this data with another provider (Please tick the appropriate boxes)

All council services	<input type="checkbox"/>	Community	<input type="checkbox"/>	Tourism & events	<input type="checkbox"/>	Town Centre	<input type="checkbox"/>
Benefits	<input type="checkbox"/>	Local Plan	<input type="checkbox"/>	Online services	<input type="checkbox"/>	Waste and recycling	<input type="checkbox"/>



**MELTON LOCAL PLAN – ADDENDUM OF FOCUSED CHANGES  
(JULY 2017)**

For official use only
<b>Respondent Ref:</b>
<b>Date Received:</b>

## FC4 HOUSING SITE ALLOCATIONS COMMENTS

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### SITE SETTLEMENT *(Please select the site that you interested in (additional sites will need to be entered on another form))*

#### SITE

Ab Kettleby	<input type="checkbox"/>	Asfordby	<input type="checkbox"/>	Melton Mowbray	<input type="checkbox"/>
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Bottesford	<input type="checkbox"/>	Easthorpe	<input type="checkbox"/>	Scalford	<input type="checkbox"/>
Frisby	<input type="checkbox"/>	Harby	<input type="checkbox"/>	Somerby	<input type="checkbox"/>
Gaddebsy	<input type="checkbox"/>	Hose	<input checked="" type="checkbox"/>	Stathern	<input type="checkbox"/>
Great Dalby	<input type="checkbox"/>	Long Clawson	<input type="checkbox"/>	Thorpe Arnold	<input type="checkbox"/>
		Wymondham	<input type="checkbox"/>	Waltham	<input type="checkbox"/>

PLEASE INDICATE THE SITE REFERENCE HERE (If you wish to comment on the approach or policy as a whole please do so in the boxes below):

#### Do you believe that this policy/section of the Melton Local Plan focused change is? *(Please tick the appropriate box)*

- |                                      |     |                                     |    |                                     |
|--------------------------------------|-----|-------------------------------------|----|-------------------------------------|
| 1. Legally Compliant:                | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            |
| 2. Sound:                            | Yes | <input type="checkbox"/>            | No | <input checked="" type="checkbox"/> |
| 3. Complies with Duty to Co-operate: | Yes | <input checked="" type="checkbox"/> | No | <input type="checkbox"/>            |



1. Do you consider that the focused change is unsound because it is not any of the following? (Please tick the appropriate box)

1) Positively Prepared ☐

2) Justified ☒

3) Effective ☒

4) Consistent with National Policy ☒

Please give details of why you consider this focused change is not legally compliant or is unsound or fails to comply with the Duty to Co-operate. Please be as precise as possible. If you wish to support the legal compliance or soundness of this policy or its compliance with the Duty to Co-operate, please use this box to set out your comments. (Please continue onto a separate sheet if you require more space)

LC,H+H Parish Council (PC) has worked in co-operation with MBC on a draft Neighbourhood Plan (NP) in a positive attempt to meet local housing need in the spirit of the NPPF. At Aug 2017 the NP was at Regulation 16 stage. The Draft Local Plan categorises Hose as a Service Centre for which the overall requirement in Table 7 is 57 homes. The PC notes that the Housing Site Allocations Appendix to FC4.1 includes various changes relating to sites in Hose, which have a bearing on the village and the PC's NP proposals. The PC wishes to make inter-related representations as follows:

**(A) HOS1 (land off Canal Lane –on the N side)**

MBC proposes to extend the original site (for which outline planning permission has already been approved subject to S106 Obligation, for 25 homes), by 'squaring off the field' in which the site lies. The PC understands that a complementary planning application for a 17 home addition to the indicative approved layout has now also been approved in principle by MBC. As a result the PC accepts that the principle of this allocation is established and supports the extended boundary of the renumbered site that would have gross capacity to provide some 42 new homes.

**(B) HOS2 (newly proposed allocation site on land west of Harby Lane, north of the village)**

This site has come forward at a late stage in both the LP and NP plan making processes. The PC objects to the FC4.1 inclusion of this land as an Allocation Site. During drafting of the Regulation 16 draft NP for the parish the PC considered this late arriving SHLAA submission site. Following extensive consultations with local residents in Hose a clear consensus emerged that the development of this site would be an unwelcome and visually intrusive proposal harmful to the sensitive and relatively exposed northern outer edge of the village. This opinion is supported by the findings of MBC's Settlement Fringe Study, Part 2, Aug'16 (MBC/LC3c pp 50-51). These note that in LCZ6 the settlement has an exposed settlement edge on Hose Lane "*conspicuous on the approach to the village from the north...*" The analysis concludes that: "*Overall the landscape sensitivity to residential development is **medium**...(while adding that)...The prominent settlement edge offers opportunity for development that would lead to improved integration of built form in this landscape.*" This last point might seem to support some limited, low impact development. However, in the PC's view such potential for development must be weighed against the appraisals of local Heritage assets in the immediate area summarised in MBC's Service Centre site updates, May 2017. At Part 2, page 170 the heritage assets are described thus:

*The site lies outside the conservation area by 155m. The nearest listed building is grade II listed Grange Farmhouse 75m to the north and the grade II listed 10 Chapel Lane 165m to the south. There is intervening built form between the site and the listed building and conservation area to the south. The site lies adjacent to the farm unit which includes the listed farmhouse to the north.*

*The village of Hose is a compact and densely populated settlement located on the west side of Harby Lane, a busy rural road which traverses the heart of the Vale of Belvoir midway between Long Clawson and Harby. Extensive Medieval earthworks to the north indicate that it was once a much larger settlement. There were also once Roman farms, a manor house, monastic grange, watermills and an Elizabethan vicarage. The conservation area is confined to the southern half of the village which includes the historic core and older parts of the village centred on the St Michael and All Angels Church and surrounded listed buildings. The site is located to the north and east of the village, outside of the conservation area. However there is a strong relationship between the site and the north eastern boundary of the conservation area. To the eastern side of the conservation area are a series of well preserved historic field patterns with ridge and furrow remains, although to the western side it is reduced, with the allocated site infilling greenfield land between the modern C20 element of the village and the Grade II listed Grange, which is presently detached from the settlement of housing within the village. The HER identifies a wealth of archaeological remains in the vicinity of the Grange, including traces of building foundations and a hollow way between the moated site, a scheduled ancient monument (SAM), and a southern route into the village.*

*Development at this point will disrupt the historic relationship between the SAM and surrounding area to the village, although this has already been partially undermined by modern C20 development to the north of the village. Careful landscaping can mitigate this harm, with the inclusion of a green corridor between the allocation and the village. Furthermore, the setting of the Grade II listed Grange will be substantially altered, as previously it has enjoyed uninterrupted views into the countryside.....*

*...Finally, the HER identifies significant Roman remains on the site, including a gray ware rim and several fragments of gray ware, fragments of undated brick and tile, as well as medieval and post-medieval pottery. As such appropriate archaeological mitigation will be necessary.*

In the PC's view the landscape and varied, but considerable, Heritage asset impacts of development have been undervalued in the Borough Council's own conclusions. In particular, without further investigation of the Heritage assets allocation for housing development is premature and could cause serious harm to such irreplaceable assets. In the light of these adverse impacts the PC considers the allocation to be unsustainable and contrary to NPPF paras 109, 110, 113 relating to conserving and enhancing the landscape qualities of rural areas, and para 126 and following paras relating to conserving and enhancing the historic environment.

Furthermore in the NP's Sustainability Appraisal of potential Allocation Sites, this land performed less well than the two sites immediately west of the village conservation area, originally referenced HOS2 and HOS 3 in the Draft LP Nov.'16. If the

potential delivery of the larger of these two sites is combined with the extended HOS1 (see above) then the village has the potential to supply some 57 additional dwellings over the plan period against the HEDNA adjusted residual settlement requirement of some 43 new homes (see LCH Reg 16 NP Table 2, p22 - [https://docs.wixstatic.com/ugd/c2f881\\_95113e4204cc44e8a67579d1a8b98835.pdf](https://docs.wixstatic.com/ugd/c2f881_95113e4204cc44e8a67579d1a8b98835.pdf)). As such there is no convincing justification of the need for the newly proposed HOS2 Allocation Site to the north.

**(C) Former HOS2 (land off S side of Canal Lane)**

This site was allocated for 22 homes in the Nov.'16 Pre-Submission Draft LP.

In line with this the PC has similarly proposed that this site be allocated in its Reg 16 NP draft. (see: [https://docs.wixstatic.com/ugd/c2f881\\_95113e4204cc44e8a67579d1a8b98835.pdf](https://docs.wixstatic.com/ugd/c2f881_95113e4204cc44e8a67579d1a8b98835.pdf)) It sees no convincing evidence why it should now be withdrawn. Even if the Council's now revised capacity estimate of 15 is a little optimistic and there are multiple land ownerships, some additional delivery can be expected. Once the entire site is allocated any current lack of willingness between separate site owners to co-operate in a joint and co-ordinated scheme can be resolved by firmly resisting piecemeal applications as contrary to the adopted development plan proposals and hence unsustainable.

Consequently, the PC sees no justified reason to remove this allocation from the Draft Local Plan.

**(D) Former HOS3 (land to the rear of Ferndale, 41 Bolton Lane)**

This site was allocated for 10 homes in the Nov. '16 Pre-Submission Draft LP. The Council has recently revised its capacity estimate to 9 homes. The extended HOS1 and the 're-instated' HOS2 (see (C) above) have the capacity to deliver 57 homes which would meet the settlement's HEDNA adjusted OAN of 43. As a result the Council accepts that at the current time there is no pressing need to include the site as an Allocation. However, to add flexibility in the event of slow or under-delivery of new homes in Hose the PC's NP has proposed the land be a Reserve site, NPHOS3, with a capacity of 9 homes. The PC considers that the LP should do the same.

Please set out what change(s) you consider necessary to make the focused change legally compliant or sound, having regard to the test you have identified at 5 above where this relates to soundness. (NB Please note that any non-compliance with the duty to co-operate is incapable of modification at examination). You will need to say why this change will make the suggested focused change legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible. (Please continue onto a separate sheet if you require more space)

In the light of the above considerations the PC would respectfully request the examining Inspector to:

- (A) Delete the FC4.1 proposed HOS2 Allocation site from Policy C1(A) and make any consequential policy and text wording changes.
- (B) Reinstate former HOS 2 site with a capacity of 15 homes and make any consequential policy and text wording changes
- (C) Change the status of HOS3 to a Reserve Site within Policy C1(b), with a capacity of 9 homes.

Can your representation seeking a change be considered by written representations or do you consider it necessary to participate at the oral part of the examination? (Please tick the appropriate box)

Written Representations

☐

Participate at the Oral Examination

☒

If you wish to speak at the examination, please outline why you consider this to be necessary:

For the avoidance of doubt the Parish Council wished to be involved in the EIP examination of these key local judgements at the LP EIP

**Please note:** The Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the oral part of the examination.

To help us collate the responses to this consultation, we would be grateful if you could tell us which category best describes who you are representing (Please tick the appropriate box)

Melton Borough Resident

☐

Planning Agent/Planning Consultant

☐

Developer

☐

Utility/Service Provider

☐

Government Organisation

☐

Amenity Group

☐

Other Organisation	<input type="checkbox"/>	Residents Group	<input type="checkbox"/>
Business	<input type="checkbox"/>	Town/Parish Council	<input checked="" type="checkbox"/>
Other (Please state)	<input type="text"/>		

**Do you want to have further involvement in the Melton Local Plan?** *(Please tick the appropriate boxes)*

If you wish to be notified at the address/e-mail provided in Part A when the Melton Local Plan is submitted to the Secretary of State for Communities & Local Government	<input checked="" type="checkbox"/>
If you wish to be notified at the address/e-mail provided in Part A when the Inspector's Report is available to view	<input checked="" type="checkbox"/>
If you wish to be notified at the address/e-mail provided in Part A when the Melton Local Plan is adopted	<input checked="" type="checkbox"/>
If you/your organisation wish to be included in future consultations on the Melton Local Plan	<input checked="" type="checkbox"/>
If you/your organisation <b>do not</b> wish to be included in future consultations on the Melton Local Plan	<input type="checkbox"/>

**Thank you for taking the time to submit representations on the Melton Local Plan: Addendum of Focused Changes 2017. It should be noted that representations cannot be treated as confidential.**

**Would you like to be kept informed of other council services?** We will not share this data with another provider *(Please tick the appropriate boxes)*

All council services	<input type="checkbox"/>	Community	<input type="checkbox"/>	Tourism & events	<input type="checkbox"/>	Town Centre	<input type="checkbox"/>
Benefits	<input type="checkbox"/>	Local Plan	<input type="checkbox"/>	Online services	<input type="checkbox"/>	Waste and recycling	<input type="checkbox"/>