



Ref:

(For official
use only)

Melton Local Plan – Proposed Modifications Consultation – Representation Form

Following the Examination hearing sessions held in January and February 2018, Ms Mary Travers, the independent Planning Inspector appointed on behalf of the Secretary of State, has requested that the Council now undertake consultation on a number of Main Modifications (MM) required to make the Plan sound. The Inspector will consider all of the representations that are made on the proposed Main Modifications before reaching her final conclusions on any changes that need to be made to the Local Plan in order for it to be sound and capable of adoption. Her reasons will be set out in her report to the Council which will be published in due course.

Details of what we are consulting on can be found on the Proposed Modifications Consultation page of the Local Plan website at www.meltonplan.co.uk/mods

To participate in this consultation please complete the following form and return it to Melton Borough Council's Planning Policy team. Please complete both part A and part B. Comments may be made on Main Mods (MM), Additional Mods (AM) and Policies Map Changes (PMC). If you wish to comment on more than one MM, AM or PMC you will need to complete additional part B form for each additional one you are commenting on.

Please return forms electronically to PlanningPolicy@melton.gov.uk or alternatively post your responses to

*Planning Policy, Melton Borough Council,
Parkside, Station Approach, Burton Street,
Melton Mowbray, Leics, LE13 1GH*

Part A – Personal Details

If you are responding on behalf of yourself, or your own organisation, please fill in all the 'Personal Details' fields. If an agent is appointed, please complete only the Title, Name and Organisation boxes in the Personal Details column, but complete all the 'Agents Details' column.

	Personal Details	Agents Details (if applicable)
Title	Mr	Mr
First Name	Philip	Stephen
Surname	Rawle	Mair
Job Title (where relevant)	Director	Director
Organisation (where relevant)	Greenlight Developments Limited c/o Lomas Family	Andrew Granger & Co. Ltd
Address Line 1		
Address Line 2		
Address Line 3		
Address Line 4		
Postcode		
Contact Telephone		
Email Address		

Did you comment at Pre-Submission Stage of the Local Plan	Yes		No	X
If yes, please insert your representation number (You can find your representation number on the website or by clicking here).			-	
Did you comment at Focused Change Stage of The Local Plan	Yes		No	X
If yes, please insert your representation number (You can find your representation number on the website or by clicking here).			-	
Do you wish to be notified of the subsequent stages of the Local Plan?				
Publication of Inspector's Report	Yes	X	No	
Adoption of the Local Plan	Yes	X	No	

Part B – Your Representation

Please use a separate sheet for each representation

1) To which part of the consultation does this representation relate?

Main Modification

X

Additional Modification

Please note – comments should be restricted to the matters listed only and should not relate to any other aspect, site or policy of the Local Plan.

Policies Maps

If you are commenting on a Modification, please insert the MM, AM or PMC number.

MM2

Please provide comments below, being as precise as possible. Comments can support, as well as object.

The proposed main modification for Policy SS4 h1 states:

‘2,000 homes (of which 1,700 will be delivered before 2036), 15% of which should be affordable, **subject to viability**;

Greenlight Developments Limited (Greenlight) supports the introduction of the term ‘subject to viability’.

However, Greenlight, would like to raise a point that was raised at the hearing session itself into Policy SS4 (on 1st February 2018), but does not appear to have been taken into account in these proposed main modifications to the Local Plan. This being the housing figure of 2,000 homes to be delivered from the Southern Sustainable Neighbourhood.

Planning permission has been granted to Gladmans to develop up to 520 dwellings to the north of Leicester Road (LPA Ref: 15/00910/OUT).

In addition, Davidsons Developments Ltd have a current planning application for 1,500 dwellings before the Local Planning Authority (LPA Ref: 16/00515/OUT).

In this context, the housing figure stated in Policy SS4 could be said to be already met (2,000 dwellings); however, it is clear that further development will be required under Policy SS4 on the Lomas land (which forms a significant element of the Southern Sustainable Neighbourhood) in order to generate a sufficient quantum of development to deliver the southern link road.

Based on Greenlights’ initial site assessment work, it is envisaged that the Lomas land can contribute a minimum of 600 dwellings (approximately) to the Southern Sustainable Neighbourhood (there is a separate employment element to the Lomas land).

As such, Policy SS4 needs to be drafted with sufficient flexibility to allow the quantum of development to deliver the southern link road. This would mean that the housing figure of 2,000 homes to be delivered from the Southern Sustainable Neighbourhood should be increased to 2,600 homes, or if maintained at 2,000 homes with the words 'at least' added.

If you are objecting, please set out what further changes you consider necessary to make the plan sound.

It is suggested Policy SS4 h1 be re-worded to one of the following options:

Option 1:

'**2,600 homes** (of which **at least** 1,700 will be delivered before 2036), 15% of which should be affordable, subject to viability;'

Option 2:

'**At least** 2,000 homes (of which **at least** 1,700 will be delivered before 2036), 15% of which should be affordable, subject to viability;'

Part B – Your Representation

Please use a separate sheet for each representation

1) To which part of the consultation does this representation relate?

Main Modification

X

Additional Modification

Please note – comments should be restricted to the matters listed only and should not relate to any other aspect, site or policy of the Local Plan.

Policies Maps

If you are commenting on a Modification, please insert the MM, AM or PMC number.

MM2

Please provide comments below, being as precise as possible. Comments can support, as well as object.

The proposed main modification for Policy SS4 en6 states:

‘A development that comprises with building regulations for energy efficiency and carbon emissions; ~~where viable~~.’

As such, en6 proposes to remove the words: ‘where viable’.

This approach is considered to be contrary to that taken in the main policy within the Local Plan which deals with energy efficiency and carbon emissions. This being Policy EN9 (Ensuring Energy Efficiency and Low Carbon Development), which states:

‘Major development proposals will be required to demonstrate how the need to reduce carbon emissions has influenced the design, layout and energy source used, subject to viability.’ (Greenlight emphasis)

From a consistency point of view (with Policy EN9), the words ‘where viable’ should be reinstated to en6 of Policy SS4.

If you are objecting, please set out what further changes you consider necessary to make the plan sound.

It is suggested the proposed main modification for Policy SS4 en6 should be changed back to what it originally stated – this being:

‘A development that comprises with building regulations for energy efficiency and carbon emissions; **where viable**.’

Part B – Your Representation

Please use a separate sheet for each representation

1) To which part of the consultation does this representation relate?

Main Modification

X

Additional Modification

Please note – comments should be restricted to the matters listed only and should not relate to any other aspect, site or policy of the Local Plan.

Policies Maps

If you are commenting on a Modification, please insert the MM, AM or PMC number.

MM2

Please provide comments below, being as precise as possible. Comments can support, as well as object.

The proposed main modification for Appendix 5 - Monitoring Framework shows the following housing targets for the Southern Sustainable Neighbourhood:

- 200 by April 2023
- 500 by April 2026
- 1100 by April 2031
- 1700 by April 2036

It is not clear how these targets have been calculated, but when one refers to the current Davidsons Developments' planning application (LPA Ref: 16/00515/OUT), the ADC Infrastructure prepared Phasing Impact document (copy attached) contains a housing trajectory just for the Davidsons' site which exceeds the housing targets set out in this revised Local Plan Monitoring Framework. The below table sets out Davidsons' housing trajectory (as set out in the ADC Infrastructure document):

1	2	3	4	5	6	7	8	9
2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
0	0	36	72	110	110	115	115	115
0	0	36	108	218	328	443	558	673

10	11	12	13	14	15	16	17
2027/28	2028/29	2029/30	2030/31	2031/32	2032/33	2033/34	2034/35
115	115	115	115	115	115	115	22
788	903	1018	1133	1248	1363	1478	1500

It is unclear whether the Monitoring Framework also includes the Gladman site of 520 dwellings (LPA Ref: 15/00910/OUT). However, when one factors in the delivery of housing on the Lomas land also, which Greenlight has confirmed above as being a minimum of 600 dwellings (approximate), clearly the housing targets set out in the Monitoring Framework are too low.

The below table sets out Greenlights' initial housing trajectory for the Lomas land (this is based on two housebuilder outlets operating from the site):

1	2	3	4	5	6	7	8	9
2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27
0	0	0	10	46	72	72	72	72
0	0	0	0	56	128	200	272	344

10	11	12	13
2027/28	2028/29	2029/30	2030/31
72	72	72	40
416	488	560	600

When one adds Greenlights' initial housing trajectory for the Lomas land to Davidsons' housing trajectory (as set out in the ADC Infrastructure prepared Phasing Impact document), the housing targets for the Local Plan Monitoring Framework would read as follows (approximate figures):

- 270 by April 2023
- 830 by April 2026
- 1730 by April 2031
- 2100 by April 2035 (with the Plan period ending in 2036)

This assumes the Gladman site's housing trajectory is not included in the Monitoring Framework. Obviously, if it is this would increase the housing targets for the Southern Sustainable Neighbourhood over the Plan period further.

If you are objecting, please set out what further changes you consider necessary to make the plan sound.

It is suggested the proposed main modification for Appendix 5 - Monitoring Framework should be re-worded to state the following:

- **250** by April 2023
- **750** by April 2026
- **1500** by April 2031
- **2100** by April 2036

It is suggested that some flexibility is added to the targets (against the Davidsons and Greenlight housing trajectories), with the 2023 and 2026 targets following the original targets set out in this Monitoring Framework (prior to the proposed main modification), but after that the targets increase more in-line with the developers housing trajectories.

It will be noted that these comments have a direct bearing on the comments made above under Policy SS4 h1, in-relation to the number of dwellings to be delivered on the Southern Sustainable Neighbourhood within the Plan period (2036), as based on the above, the housing to be delivered on the SSN will exceed 1,700.

Part B – Your Representation

Please use a separate sheet for each representation

1) To which part of the consultation does this representation relate?

Main Modification

X

Additional Modification

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Policies Maps

If you are commenting on a Modification, please insert the MM, AM or PMC number.

MM11

Please provide comments below, being as precise as possible. Comments can support, as well as object.

The proposed main modification for Policy EC3 (Existing Employment Sites) states:

‘Proposals to change the use of all or part of an existing employment site or allocations to non-employment uses will be permitted where:

1. it can be demonstrated, through an acceptable viability study, that the site is no longer economically viable for employment purposes in the long term; and
2. there are alternative employment facilities available to meet local employment needs within the local vicinity; and
3. the site is not well related to existing centres (large, existing or planned areas of population, employment or commercial activity) or is not able to be easily accessed by public transport, walking or cycling; or
4. its release would offer significant benefits to the local area, in particular where proposals have demonstrable community support, for example through an allocation in a made Neighbourhood Plan.’

This policy reads as if all of the listed circumstances (certainly 1 – 3 above) need to apply in order for a change of use to non-employment uses to be permitted. However, Greenlights’ view is that a requirement to meet all of these provisions (certainly 1 – 3 above) would be onerous.

If a site is not economically viable for employment purposes in the long-term then, it is considered, this should be sufficient (in itself) to justify its change of use for non-employment uses.

The policy should be amended to allow one or more of the listed circumstances to apply in order for the change of use to non-employment uses to be permitted.

If you are objecting, please set out what further changes you consider necessary to make the plan sound.

In light of Policy EC3 also making reference to employment site allocations, it is suggested the title of the policy is amended to state:

‘Policy EC3 – Existing **or Allocated** Employment Sites’

In terms of the comments made above, it is suggested this element of Policy EC3 to be re-worded as follows:

‘Proposals to change the use of all or part of an existing employment site or allocations to non-employment uses will be permitted where **one or more of the following circumstances apply:**

1. it can be demonstrated, through an acceptable viability study, that the site is no longer economically viable for employment purposes in the long term; and
2. there are alternative employment facilities available to meet local employment needs within the local vicinity; and
3. the site is not well related to existing centres (large, existing or planned areas of population, employment or commercial activity) or is not able to be easily accessed by public transport, walking or cycling; or
4. its release would offer significant benefits to the local area, in particular where proposals have demonstrable community support, for example through an allocation in a made Neighbourhood Plan.’

Part B – Your Representation

Please use a separate sheet for each representation

1) To which part of the consultation does this representation relate?

Main Modification

X

Additional Modification

Please note – comments should be restricted to the matters listed only and should not relate to any other aspect, site or policy of the Local Plan.

Policies Maps

If you are commenting on a Modification, please insert the MM, AM or PMC number.

MM11

Please provide comments below, being as precise as possible. Comments can support, as well as object.

The proposed main modification for Policy EC3 (Existing Employment Sites) states:

‘Proposals for non B-class employment uses on employment sites will be allowed where they would support the effective operation of that site and would not be more appropriately located in town centres or are required to make the site viable and are not in conflict with policies contained within this Local Plan.’

To be consistent with the wording of Policy EC3 (as a whole) this element of the policy should cover both existing employment sites and allocations.

The final point of the paragraph, which states: ‘and are not in conflict with policies contained within this Local Plan’, is considered to be rather imprecise and could be subject to miss-interpretation when applied at a development management level. If this element of the policy is to remain then, it is considered, it needs to be made clear elsewhere in the Local Plan that these provisions, as set out in Policy EC3, are recognised, thus avoiding any unnecessary ambiguity/conflict.

For example, in the case of Policy SS4 (Southern Sustainable Neighbourhood), which comprises 20 hectares of employment land; if this policy recognises the provisions of Policy EC3 then if it is later substantiated through site viability (remembering a fundamental element of the SSN is the funding and delivery of the southern link road), that non-B employment uses on the element of the site allocated for employment is required in order to deliver the southern link road, sufficient flexibility is available; therefore, any potential ambiguity/conflict between Policy EC3 and other policies in the Local Plan (i.e. Policy SS4) are avoided, as Policy EC3 is recognised within Policy SS4.

If you are objecting, please set out what further changes you consider necessary to make the plan sound.

It is suggested this element of Policy EC3 be re-worded as follows:

‘Proposals for non B-class employment uses on existing employment sites or allocations will be allowed where they would support the effective operation of that site, and would not be more appropriately located in town centres, or are required to make the site viable, and are not in conflict with policies contained within this Local Plan.’

In light of the above comments, this would also lead to the re-wording of the employment element (em1) in Policy SS4 (Southern Sustainable Neighbourhood) to:

‘em1: 20 hectares of employment land for B1 (business), B2 (general industrial) and B8 (storage and distribution) uses to expand and enhance the existing Leicester Road Business Park, subject to the provisions set out in Policy EC3.’

Declaration

I Understand that all comments submitted will be considered in line with this consultation and that my comments will be made publically available and I may be identifiable to my name/organisation.

I acknowledge that I have read and accepted the information and terms specified under the Data Protection and Freedom of Information Statement.

Signed

Date 01.08.18

Data Protection and Freedom of Information Statement

The personal information you provide on this form will be processed in accordance with the requirements of the General Data Protection Regulation 2018. It will be used only for the preparation of Local Development Documents as required by the planning and Compulsory Purchase Act 2004, save for requests of such information required by way of enactment. Your name, organisation and representations will be publicly available when displaying and reporting the outcome of this statutory consultation stage, and cannot be reasonably treated as confidential. Other details, such as your address and other contact details will be treated as confidential.

You should not include any personal information in your comments that you do not wish to be made publicly available.

Your details will remain on our database and will be used to inform you of future planning policy matters and procedures relating to this Local Plan. If at any point in time you wish to be removed from the database or have your details changed, contact Planning Policy at PlanningPolicy@melton.gov.uk or by ringing the Council on 01664 502502.