Appendix

1. Melton Local Plan Pre Submission Draft - Leicestershire County Council response, detailed comments from:

Education

2. When considering the demand for places the County Council will consider a number of factors which include, as well as new housing; increases arising from births within catchment, and other demographic change for example inward migration.

3. In determining the potential to expand any particular school consideration is given to; current capacity and availability of places, site limitations and potential building/planning restrictions, as well as operational matters such as school performance, popularity and organisational structure. Account will also be taken of the availability of places at other schools within the locality and within statutory walking distances (deemed as the available route to a school). Pupil yield from housing sites which have already secured planning permission in the locality, will also be taken into consideration. Further details on the County Council methodogy for determining developer contributions is provided within Appendix 3 to the Leicestershire Planning Obligations Policy (LPOP) agreed in December 2014.

4. The proposals set out in the Melton Local Plan are welcomed in the sense that they define the expected housing growth strategy within the Borough for the next 20 years, particularly in relation to the Melton Mowbray South and North Sustainable Neighbourhoods, and Primary and Secondary Rural Centres. In contrast the planning timeframes for school places will normally cover 5 years for primary provision, and based on known births, and 15 for secondary provision.

5. Key to developing solutions for additional school places will be an understanding of the commencement date and build out rates for the proposed housing growth. It is noted that the draft Local Plan provides some information on the proposed pattern and rate of growth, this is helpful, however, is insufficiently detailed for school place planning purposes. We understand from conversations with Planners at Melton BC that this matter is now being addressed and a housing trajectory is under development.

6. In general terms there are two key issues arising from the Local Plan.
   The first relates to the sequence of housing growth, as outlined above this is of particular importance in the Primary and Secondary Rural Centres where a number of individual housing proposals might contribute to the expansion of local primary schools. Clearly, if such developments are not occurring simultaneously then planning for the provision of additional school places can create significant

capital funding risks for the Local Authority (if commitment is given to a particular scheme) and may also lead to inefficient use of public resources.

7. The second issue relates to the impact on Secondary provision in the Melton urban area given the lack of clarity around the sequence and size of developments to the north and south of the town. Further clarity in this regard will help the Local Authority determine the most appropriate solution for the provision of places.

8. In summary the LA would need to have further information surrounding the timing and scale of development to take account of the cumulative impact of housing proposals in each of the identified locations this is essential to support the strategic planning of school places. It is not expected that any single housing development should carry the full burden of provision of school places, where such might only form part of a proposed solution, but should take account of the collective impact of all developments within the locality – this is in keeping with the LPOP.

9. In some locations there will be potential for phased development of additional provision to mitigate the financial risks, but this will not be the case for all schools.

10. With specific regard to the detail of the Local Plan I would offer the following comments:-
    Policy SS4 Melton Mowbray South Sustainable Neighbourhood

    Policy SS5 Melton Mowbray North Sustainable Neighbourhood

    Primary provision

11. The Council is pleased to note that a new primary school is included in both development areas. A 420 place school would be required in each location, the cost of each school is currently in the region of £5.35million, and each site would need to be a minimum of 1.7ha.

    Secondary provision

12. Potentially there are three options for the provision of additional secondary places in Melton town, to:-
    - Share the additional secondary age pupils across the existing two Secondary Schools of John Ferneley and Long Field Colleges and expand both schools to accommodate the additional pupils. Costs have not been determined for this option as this is dependent upon the views of Melton Borough Council regarding flood plain development and land acquisitions. – Any expansion would require the agreement with both Academy Trusts to support the expansion, and advice from Melton planners regarding the development of the Long Field site part of which is located on a flood plain. It is strongly expected that any solution to expand the College will be in excess of funds from normal developer contributions, in which circumstance the full cost of the

work would be sought from the developer(s). To expand John Fernley College would also require additional land.

- Build a new 600 place secondary school in the town. This would require a site of approximately 5ha to be set aside by developers, but it would have the added benefit of future proofing secondary provision, in terms of further growth and demand for places. The cost to provide a 600 place secondary school is currently £17million.

- Expand John Ferneley College by a further 600 places at an estimated cost of £10.99million, educationally this does not offer a good solution as it makes the school approximately 1700 places, which is very large in comparison to Long Field at 800 places. Typically Leicestershire Schools are in the range from 600 to 1000 places. Of equal importance consideration needs to be given to the significant movement of pupils across the town to access the John Fernley campus, and the availability of adjacent land to enable expansion.

Policy C1 – Housing allocations

Primary provision

13. Development of the Primary and Secondary Rural Centres will require a s106 contribution to meet the cost of expanding the existing schools within the villages named. Many of the schools in these locations occupy very constrained sites, with some located in conservation areas and/or having buildings of architectural value and have limited potential for expansion. Two examples are Long Clawson and Somerby. In such circumstances it would be appropriate for the County Council to seek from developers the full costs of expanding schools rather than a contribution based on the yield rates and cost multipliers, this is set out for example in the response to application 2016/0709/06 Back Lane, Long Clawson. In such circumstances the County Council would wish to see the contribution paid at a very early stage of development to ensure the early availability of places as new housing becomes occupied. If this is not achievable or possible then the County Council may also seek an additional contribution to cover transport transitional costs for pupils to nearby schools having a place, until such time as the new accommodation is available in the locality. This may in part be mitigated if trigger points for s106 contributions are met early in each development.
The issue relating to sequencing and timing of housing developments is critical to these rural locations, and it is essential to count the cumulative impact of developments when planning for the provision of additional school places.

Secondary provision

14. Rural developments will either fall within the catchment area of the Melton town secondary schools, and would be considered as part of the Secondary options outlined above, or within the catchment area of the Bottesford Belvoir High school, which based on current forecast pupil numbers is capable of expansion to accommodate the additional pupils from development in these areas.

Transport

15. The following caveats apply to the comments made below:

1. These comments are on behalf of the County Council as the Highway Authority.
2. These comments are without prejudice to any views that the County Council might express in the future.
3. The County Highway Authority recognises the importance of having an up to date Development Plan in place and remains committed to working with Melton Borough Council in its development.

16. The County Council, as the Highway Authority, is working with Melton Borough Council to develop the Melton Mowbray Transport Strategy. This will support delivery of the Local Plan through identifying, securing and delivering a range of transport measures including significant transport infrastructure such as the Melton Mowbray Distributor Road (MMDR). The Strategy will seek to ensure good connections to the town centre, key services and employment centres supporting both the housing and economic growth. As part of developing the Melton Mowbray Transport Strategy the County and Borough Councils have worked together to produce a clear evidence base demonstrating the need for significant transport infrastructure as an essential part of the delivery of the SUEs in Melton Mowbray.

17. The County Council notes that Local Plan Appendix 1 contains site allocations and policies and recognises the significant role the rural portion of the District will play in delivering the planned growth. It is noted that in several places (for example), specific reference is made to how the Melton Mowbray Distributor Road will “improve” or “reduce” congestion within the town centre (or similar terminology to that effect).

18. For clarity, we understand this to mean an improvement/reduction relative to traffic conditions in future but without the distributor road in place; rather than relative to traffic conditions as they are today, or without the planned growth taking place in the town. This is in line with the most recent transport modelling evidence presented within the Melton Mowbray Outer Relief Road Options Appraisal Report (2016) produced by Jacobs on behalf of Leicestershire County Council.

19. It is also worth noting that the latest evidence regarding traffic conditions in the town centre with the distributor road in place does not account for or make any assumptions about the wider/supporting transport measures to be implemented within the town; either through the Melton Mowbray Transport Strategy or as mitigation for specific developments. These measures could also affect network performance within the town, and will be determined based on priorities emerging through the transport strategy and development management process.

20. As presently written the Local Plan does not clearly set out the thoroughness of the work that has been undertaken to inform the development strategy and how it

relates to the future growth of the town. It would be unfortunate if others had concerns over the deliverability of the plan and therefore consider it to be possibly unsound as a result of this. Therefore it would be helpful to strengthen the Plan to demonstrate the robust evidential approach that has been undertaken in developing the plan and identifying associated transport infrastructure.

21. In summary, the County Highway Authority has no cause to question the soundness of the Local Plan in respect of the proposed proportion of housing growth to be accommodated in and around Melton Mowbray and the proportion elsewhere across the Borough. Nor does it with respect to the proposed levels of housing allocated to the various villages. Consideration of specific sites will be subject to normal considerations through the development management process including (for example) the provision of safe and satisfactory site access and any required highways and transport mitigating measures.

Specific comments:

1. The terms Melton Outer Relief Road (MMOR) and Melton Mowbray Distributor Road (MMDR) are used interchangeably throughout the Plan. This is a result of the development of the scheme over a period of time. However it would be useful now to refer to the scheme by a single name - Melton Mowbray Distributor Road.

2. **Strategic Objectives: Accessibility and Transport Priorities**

   - Suggest point 9 reads 'Improve access to jobs and services'

3. **Policy SS4 – South Melton Mowbray Sustainable Neighbourhood Transport**

   - Point C Perhaps could read ' Sustainable new and enhanced'

   - T2 A – We would suggest removing the reference 20 min frequency and replacing with suitable and regular. This will enable consideration to be given to providing appropriate services for shift workers, school and other commuter patterns as well as regular services to the town centre.

   - Master Planning and Delivery – should include route of the relevant section of the distributor road?

4. **Policy SS5 – North Melton Mowbray Sustainable Neighbourhood Transport**

   - T1 B – In order to use this paragraph and refer to it as part of the planning process it would be useful to clarify the meaning of this point. It may be possible to combine with point A "strategic road link connecting the A606 Nottingham Road to Melton Spinney Road forming part of the MMDR and facilitating the wider scheme".

- Point D Perhaps could read ' Sustainable new and enhanced'
- T2 A – We would suggest removing the reference 20 min frequency and replacing with suitable and regular. This will enable consideration to be given to providing appropriate services for shift workers, school and other commuter patterns as well as regular services to the town centre.
- 4.5.4 – Suggested change to "Walking and cycling connectivity to the town centre will be significantly improved. The development will also provide a new link road connecting the Scalford Road with the Nottingham Road. Supporting upgrades to Bartholomew's Way and Welby Road and an onward link to the A6006 will be considered as part of the Melton Mowbray Transport Strategy and will likely be secured through development specific mitigation."
- Master planning and delivery – should specifically include route of the distributor road.

5. **4.7 Long term Growth Strategy and review triggers:**

- 4.7.4 3rd bullet – Description now needs to be updated.

6. **6.12 Holwell works and Asfordby Business Park**

- 6.8.2 see comment below at 6.12.1
- 6.12.1 Suggest the last sentence of this paragraph be rewritten 'Improved access will be considered as part of the Melton Mowbray Transport Strategy and will likely be secured through development specific mitigation.

7. **Chapter 8 Delivering Infrastructure:**

- 8.3.6 1st Bullet could be updated to read 'Congestion in the town centre'

8. **Policy IN1 – Transport and Strategic Infrastructure**

- 6 Melton Mowbray – list of infrastructure should describe the whole MMDR and then identify the parts likely to be funded by development. This could then be reflected in the infrastructure delivery plan.

Strategic Assets

22. The following comments are made by Strategic Property Services Asset Management Group in relation to the County Council's role as landowner.

23. Leicestershire County Council's principal land interest in Melton Borough it would seek to promote through the consultation process would be the land at Sysonby Farm, Melton Mowbray – this site forms part of the Melton Mowbray North

Sustainable Neighbourhood for which a separate detailed collaborative response will be submitted.

Vision and Strategic Objectives

24. Broadly the Vision for the Borough and the means of Delivery are supported, in particular the aspiration to meet the needs of business, the housing needs of the whole community and the infrastructure required to meet the needs of the community and a growing economy. These elements of the Vision are underlined in the Strategic Objectives. The Housing and Jobs and Prosperity objectives are strongly supported being seen as the key to the delivery of all those contained in the wider plan.

Spatial Strategy

25. Policy SS1 is supported as it is seen to embrace the core principles at the heart of the NPPF as set out at paragraph 14.

Housing and Employment Growth

26. The Council's approach to the calculation of Objectively Assessed Need (OAN) and Employment Land Requirements is seen as sound and the headline housing numbers and employment land assessment are broadly accepted. However, the plan needs to demonstrate that it robustly addresses the duty to co-operate and that due account has been taken of any potential housing shortfalls within neighbouring Strategic Housing Market Area's (SHMA) or Local Housing Market Area's (LHMA). In order to be the OAN calculation to comply with the requirements of paragraph 47 of the NPPF account should be taken of the housing and employment needs detailed in the emerging HEDNA. Accordingly, both needs assessments should be considered as the minimum requirements of the Borough for the period to 2036.

Policy SS2 – Development Strategy

27. The rationale behind Policy SS2 which outlines the distribution of housing throughout the Borough with a minimum of 65% of housing concentrated in Melton Mowbray is entirely logical. This policy facilitates the delivery of necessary infrastructure through larger scale developments in Melton Mowbray whilst recognising the importance of supporting a prosperous rural economy, as detailed at paragraph 28 of the NPPF, enabling key rural settlements throughout the Borough to remain sustainable. Further, it recognises the positive role of Service Centres, Rural Hubs and other smaller settlements in contributing to the delivery of housing numbers. However, the distribution of housing throughout the lower tiers of the settlement hierarchy needs to have the flexibility to enable sustainable sites to be brought forward on an opportunity basis in order to maximise the delivery of housing where supported by existing infrastructure.

Policy SS3 – Sustainable Communities (unallocated sites)

28. It is noted at PolicySS3 that the delivery of windfall sites meets the guidance set out in paragraph 48 of the NPPF but again there needs to be a more flexible

approach to delivery which takes account of the capacity of individual sites to deliver housing numbers.

Policy SS5 – Melton Mowbray North Sustainable Neighbourhood

29. The proposed allocation of the Melton Mowbray North Sustainable Neighbourhood, including LCC owned land at Sysonby Farm, is strongly supported. Further, the site is deliverable and capable of making significant contribution to the infrastructure needs of the town. The key deliverables other than housing numbers are seen as desirable but should be brought forward in response to evidence base and/or commercial demand.

30. It is essential to adopt a flexible approach to master planning of the Melton Mowbray NSN in order to expedite delivery. Within this process there is a need for landowners/ developers to commit to the location of uses and secure the line of the link road. Beyond that each should have the flexibility to bring forward development at a time appropriate to them within the context of the plan. In particular, the land between Nottingham Road and Scalford Road (partly in LCC ownership) has the ability to be brought forward , as a standalone site, at an early date to enable the 'pump priming' of infrastructure delivery. This approach would also support the delivery of housing numbers in the early years of the plan which appear dependant on the delivery of other sites within the Borough which currently appears to be lagging behind the required 245 per annum.

31. Whilst the allocation is strongly supported attention is drawn to the ability of the overall allocation to deliver significantly higher numbers than the 1700 currently proposed. Accordingly, the 1700 should be considered as a minimum giving the opportunity to housebuilders to develop the site out at densities compatible with current market demand providing the potential to make up shortfalls elsewhere in the Borough.

Policy SS6 - Alternative Development Strategies and Local Plan Review

32. Through a flexible approach to master planning of the Melton Mowbray NSN it has the potential to offer the ability to meet shortfalls in housing delivery elsewhere.

Policy C1(A) – Housing Allocations

33. The policy needs the flexibility for further unconsented sites to be brought forward to support overall housing delivery in Melton Mowbray and other settlements.

Policy C1(B) – Reserve Sites

34. Whilst the proposal to consider the allocation appears consistent with the provisions of the NPPG, the policy contrains the delivery of additional windfalls that may deliver more appropriate development. In addition, in the application of this Policy consideration of the potential to increase the level and speed of housing delivery within the Sustainable Neighbourhoods should also be taken into account and the benefits of increasing numbers in the delivery of community infrastructure weighed against the constraints identified in respect of the reserved sites proposed.

Policy C2 – Housing Mix

35. The provisions relating to Housing Mix are broadly welcomed in that, in addition to market conditions/economic viability they take account of the needs of the ageing population and people with specific accommodation requirements.

Policy C4 – Affordable Housing Provision

36. The policy proposes a target rate for Affordable Housing of 37%. This target needs to be regarded as a maximum with actual delivery on a site by site being set at a level that does not compromise the viability and deliverability of the development. Further, it should have regard to the overall level of infrastructure being brought forward as a result of the housing scheme and a balance achieved between the two.

Policy C5 – Rural Exception Sites

37. The development of Rural Exception Sites is supported as it enhances the sustainability of small settlements throughout the Borough.

Policy C9 – Healthy Communities

38. The policy appears to fully reflect the guidance given in the NPPF. However, attention is drawn to the need for contributions towards health care services take account of any existing service capacity and development viability.

Melton's Economy

39. Policies EC1 and EC2 provide the necessary platform to deliver future economic growth and are therefore welcomed. However, the plan needs to be sufficiently flexible to enable further sites to be brought forward to replace existing employment areas that become unviable or unfit for purpose as detailed in Policy EC3.

40. Policy EC5 whilst supportive of maintaining a vibrant town centre is regarded as placing unnecessary restrictions on the retail development of the edge of the centre as the scale would be incompatible with the existing town centre but nevertheless would have the effect of attracting additional business and potential footfall to the town creating further potential economic benefits.

Policy EN8 - Climate Change

41. It is suggested that the climate change requirements take account of viability.

Policy EN9 – Ensuring Energy Efficient and Low Carbon Development

42. With regard to the energy efficiency requirements contained within this policy it is suggested that development meets current Building Regulations standards rather than a higher policy led target.

Policy INF2 - Infrastructure Contributions

43. There is general support in principle to the proposed prioritisation of infrastructure contributions but consider that the policy should be drafted such that in their determination full account should be taken of site viability.

Waste Management

44. Any development around Melton Mowbray is likely to have a detrimental effect on the civic amenity infrastructure which already has an evidenced capacity shortfall. The Melton Mowbray civic amenity site provides an on demand service to which at peak times there has been an evidenced capacity deficiency. Furthermore, the Melton Mowbray civic amenity site has no effective means of increasing capacity beyond that already identified and allocated to existing planning obligations or historical planning applications. Appropriate mitigation measures, which may include land for and development of or contributions towards land for and development of a new civic amenity site and / or waste transfer station to off-set the increased demand placed on the waste infrastructure, need to be recognised in this plan.

Flooding

45. All types of flooding must be considered when identifying new development sites as detailed in the National Planning Policy Framework (March 2012) section 10, ' Meeting the challenge of Climate Change, Flooding and Costal Change'. Developers should also consider The Sequential and Exception Tests as outlined in paragraph 21 of the Planning Practice Guidance (March 2014).
In line with current government policy, (Sustainable drainage systems: Written statement - HCWS161, December 2014), Sustainable Drainage Systems (SuDS) should be prioritised for managing surface water flows. Therefore appropriate space allocation for SuDS features should be included within development sites. These features should look to introduce blue green corridors to improve the bio-diversity and amenity of new developments, and surrounding areas where possible.

46. Often ordinary watercourses and land drainage features (including streams, culverts and ditches) form part of development sites. LCC recommend that existing watercourses and land drainage (including watercourses that form the site boundary) are retained as open features along their original flow path, and are retained in public open space to ensure that access for maintenance can be achieved'.

47. To achieve these aims the LCC in our role as the Lead Local Flood Authority would recommend that communities consider the following principles when assessing site allocation:

- Locating development outside of River (Fluvial) Flood risk (Flood Zone 2 and 3)

- Locating development outside of Surface water (Pluvial) Flood risk (updated Flood Map for Surface Water)
- How potential SuDS features may be incorporated into the development to enhance the local amenity, water quality and biodiversity of the site as well as manage surface water runoff.
- Watercourses and land drainage should be protected within new developments to prevent an increase in flood risk.

Broadband

48. There is no mention of Broadband provision in either Chapter 4 or 5 on Housing – any significant developer (over 50 houses) the government has placed the onus on the developer to work with Openreach to ensure that the infrastructure is provided in any new site, as once rollout through our current programmes has been completed there will be no new funding for future housebuilding. http://www.ournetwork.openreach.co.uk/

http://home.bt.com/tech-gadgets/tech-news/superfast-broadband-coming-to-new-build-homes-11364038750356

https://www.gov.uk/government/news/new-build-homes-to-have-superfast-broadband-connectivity

49. Policy EC2 – Employment Growth in rural areas there is no mention that this is dependent on being able to access good broadband speeds.

50. Paragraph 5.11.6 lists services but again Broadband needs to be included.

51. Paragraph 5.13 Self- Build needs to include Broadband if possible – especially sites over 5 houses.

52. Policy C9 Healthy Communities – needs a reference to Broadband because if people are expected to access more services on-line then Broadband provision will be required.

Economic Growth and Town Centre

53. Support the intent of the overarching strategy to provide for growth through a spatial distribution which seeks to strengthen the role of Melton Mowbray town further by directing approximately 65 per cent of the requirement towards the town and 35 per cent towards the villages.

54. Work by Melton Borough Council following the withdrawal of the previous local plan (Melton Core Strategy) on a 'Settlement Roles, Relationships and Opportunities Report 2015' is noted. It is understood this has informed the urban rural balance in the Melton Local Plan Pre Submission Draft alongside assessment of three potential locations for new villages and associated

sustainability appraisals. It is also understood that Melton Borough Council concluded that an increased focus of development on Melton Mowbray, delivered through two new sustainable neighbourhoods would have the greatest potential to realise the Vision for the Borough, but that it should not be at the expense of allowing some of the Borough's villages to grow to become more sustainable and add to housing choice and delivery.

55. Query the need to identify 'reserve sites', citing that currently unknown opportunity sites, such as previously used employment sites could come forward for redevelopment which may form a more sustainable location than a 'reserve site'.

56. Policy EC5 in the economy chapter regarding the town centre, should be commended as a Town Centre Neighbourhood Plan (led by the BID) is being developed which will be steered by the businesses and the people who live in the town centre boundary and will investigate sites for development. This will include the Town Centre investment model that Melton town centre acted as a pilot for.

57. Paragraph 6.15.3 Need to emphasise that the evening economy is becoming a vital reason why people use the town centre and hence a growth in good quality restaurants should be encouraged, as opposed to fast food takeaways, to encourage people to use the vital resource of the independent cinema and theatre attached to the college. The strengthening of Melton Mowbray town centre as a desirable evening destination will help to ensure it provides a destination of choice for people living within the town and in the surrounding villages.

58. Furthermore the encouragement of high quality residential development should be encouraged in secondary locations to increase footfall and usage of the town centre.

Communities and Wellbeing Services

59. LCC delivers Libraries, Museums and Adult Learning Services in the Melton Area through the following venues:

- Melton Library, Situated within Melton Brooksby College;
- Melton Carnegie Museum; and
- Bottesford Library (which is a library managed as a Community Interest Company (CIC) with a support package from the County Council.

60. The County Council would be interested in any developments that would assist in reducing costs in delivering services in Melton Town, possibly by linking the Library with the Museum into a single venue that would also enable the delivery of adult learning services.

61. In the recent past, some venues have been explored, however these have not been viewed as viable to cater for the demand on services.

Biodiversity, Leicestershire & Rutland Environmental Records Centre

62. Comments provided by the Leicestershire & Rutland Environmental Records Centre at the Options stage earlier in 2016 are still relevant and officers from the L&R Environmental Records Centre continue to liaise with officers at Melton Borough Council on these matters.