



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

For official use only
Respondent Ref:
Date Received:

The focused changes being proposed in the Melton Local Plan have been split into the main themes that are being addressed since our last consultation in November 2016:

FOCUSED CHANGE DESCRIPTION	FC NUMBER
1. Spatial strategy FC1.1 to FC1.3 (see schedule of the proposed focused changes)	FC1
2. Sustainable neighbourhoods FC2.1 Policy SS4 FC2.2 Policy SS5	FC2
3. Growth strategy	FC3
4. Housing site allocations** FC4.1 Section 5.4, C1 (A) & C1 (B) FC4.2 Appendix 1	FC4
5. Housing mix	FC5
6. Affordable housing	FC6
7. Gypsies and travellers	FC7
8. Economy	FC8
9. Indoor sports & recreation	FC9
10. Infrastructure delivery plan	FC10
11. Melton transport strategy	FC11
12. Developer contributions	FC12
13. Policies map 13.1 Revised boundary of southern sustainable neighbourhood 13.2 Addition of corridor of investigation/interest for the Melton Mowbray Distributor Road	FC13

****PLEASE SUBMIT 1 REPRESENTATION FORM PER FOCUSED CHANGE (FC)****

****To comment on HOUSING SITE ALLOCATIONS, please scroll down to the end of this form****

To view more specific policy numbers, please refer to the relevant FC number using the reports on the website at: www.meltonplan.co.uk/focussed-changes-to-plan

What ‘soundness’ means

The Local Plan will be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements, and whether it is sound. A local planning authority should submit a plan for examination which it considers is “sound” – namely that it is:

- **Positively prepared** – the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with national policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.



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Melton Borough Council proposes to submit the Melton Local Plan (MLP) to the Secretary of State of Communities and Local Government for independent examination. Before submitting the MLP, the Council is required to publish the document and invite the public to make representations on its 'soundness'.

This form has two parts:

- Part A: Personal Details
Parts B and C: Your representation(s).

When making representations, please use a separate Part B form for focused change you wish to comment on. Before completing the form you should read the accompanying Guide to Making Representations.

Completed forms should be returned to the address below no later than 23rd August 2017. Representations received after this deadline will not be accepted.

Planning Policy Team
Regulatory Services
Melton Borough Council
Parkside, Station Approach
Melton Mowbray
Leicestershire
LE13 1GH

Alternatively, you can access this form on the Council's website https://www.meltonplan.co.uk/focussed-changes-to-plan & print it out or complete it electronically and e-mail your response to planningpolicy@melton.gov.uk

Representations can also be made via the Council's on-line consultation portal - https://meltonboroughcouncil.citizenspace.com/planning-policy-team/copy-of-focussedchanges-addendum-consultation-s/

PART A: ABOUT YOU/YOUR ORGANISATION (If you are an agent, please complete the personal details of your client in 1 and complete agent's details in 2).

1. Personal Details

Full Name:

Mr Christopher Shatford

Organisation (if applicable)

N/A

Address:

[Empty address box]

Postcode:

[Empty postcode box]

Email:

[Empty email box]

Contact Number:

[Empty contact number box]

2. Agent's Details (If applicable)

Full Name & Company:

[Empty full name & company box]

Organisation/Client Representations on Behalf Of

[Empty organisation/client box]

Address:

[Empty address box]

Postcode:

[Empty postcode box]

Email:

[Empty email box]

Contact Number:

[Empty contact number box]

Number of Representations Enclosed:

Number Three of Four

Signature:

[Empty signature box]

Date: 19th August 2017

(PART B)

For official use only	
Respondent Ref:	Representation Ref:
Name/Organisation: Mr Christopher Shatford	

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.)

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

FC number: FC4.2 Policy number: Appendix 1

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

1. Legally Compliant: Yes No
2. Sound: Yes No
3. Complies with Duty to Co-operate: Yes No

*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

5. 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

6. 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)

Please refer to 'FC4 HOUSING SITE ALLOCATIONS COMMENTS' below.

7. 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)

Please note: Your representation should cover succinctly all the information, evidence necessary and supporting information necessary to support/justify the representation and suggested change, as there will not normally be a subsequent opportunity to make further representations based on this original representation.
After this stage, further submissions will only be at the request of the Inspector based on the matters and issues they identify at the examination.

FC4 HOUSING SITE ALLOCATIONS COMMENTS

The following questions will relate to housing site allocations. There will be an option to complete additional forms for up to 10 sites. 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			
FC4.1	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.	- 11 site allocations deleted - 3 reserve sites deleted - 16 site allocation boundaries amended - 22 allocated sites with capacity changes - 1 reserve site with a capacity change - 8 new site allocations, and 2 extended existing sites - 2 new reserve sites - 14 allocated sites and 2 reserve sites renumbered.
FC4.2	Appendix 1	Amended site specific policies. New reasoned justification and site specific policy for Scalford and Great Dalby.	- Reflects FC4.1 above. - Amended criteria setting out development conditions for some site specific policies.

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

8. 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 type="checkbox"/>	Somerby	<input type="checkbox"/>
Gaddebsy	<input checked="" 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: GADD2

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

Positively Prepared Justified Effective Consistent with National Policy

3. 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 Cooperate. Please be as specific as possible. If you wish to support the local planning authority's compliance with this duty, it is

10. 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)

In respect of this representation, I regard the 'Focused Change' to be unsound on the basis that the GADD2 housing allocation is not justified. GADD2 is not the most appropriate allocation when considered against other reasonable alternatives. Supporting argument is presented below and categorized under key headings.

1. Efficient Use of Land and Minerals

In respect of the efficient use of land and minerals the selection of the GADD2 site is not appropriate, when considered against other reasonable alternatives. The 'Melton Local Plan Addendum of Focussed Changes: Sustainability Appraisal Addendum' (June 2017; p26) sets out SA objective 8: **'To use land and mineral resources prudently and efficiently, also maintaining and enhancing soil quality.'** Paragraph 4.26 (p26) goes on to state that 'This objective considers the potential loss of higher quality agricultural soils and important minerals as a result of development. It should be noted that Grade 3a land is considered to be high quality.'

The selection of the GADD2 site is in *direct opposition* to this objective. 'Rural Hubs: Update to site assessments including information on availability of land, suitability of site, viability and deliverability timescales (30/05/17; p138) identifies GADD2 as occupying both grade 3a agricultural land classification (Greenfield) and located in a gypsum mineral consultation area. This is also the case for the neighbouring GADD3 site, separated from GADD2 by one property only (<50metres). In respect of GADD3, the 'Melton Local Plan Addendum of Focussed Changes: Sustainability Appraisal Addendum' (June 2017; p26, paragraph 4.27) states 'One further site (MBC/005/17 at Gaddesby) has been identified as lying mostly on Greenfield land which is of Grade 3a quality and therefore a significant negative effect has been recorded. This site is also located on land which has been identified as a Minerals Consultation Area for gypsum and therefore development at this location may result in the loss of access to or sterilisation of important mineral resources in Melton.' The GADD2 site is deemed to be totally unsuitable on the basis of the significant negative effect caused by the potential loss of land quality and status as a minerals consultation area for gypsum.

2. Landscape

In respect of the impact on the surrounding landscape, the selection of the GADD2 site is not appropriate, when considered against other reasonable alternatives. Policy EN1 of the Pre-Submission Draft Melton Local Plan (p98) states 'Proposals will be supported where they do not adversely affect important landscape features including...(4) Important views, approaches and settings'. Inclusion of the GADD2 site would have a significant negative effect on the character of the settlement edge, topography and skyline, aesthetic and perceptual quality including landscape experience and tranquility, views and visual character. When reaching the junction of Rotherby Lane and Pasture Lane, the transition from settlement to open countryside is clear and distinct, emphasizing the sense of separation of the countryside from the settlement edge, inclusion of the GADD2 site would blur this distinction and impact adversely on the open landscape character.

The 'Local Plan Appendix 1 Site allocations and policies' (p44) acknowledges the impact of any further development on the northern fringe of Gaddesby village, stating that 'The eastern part of the settlement has high landscape sensitivity, however '(...)It is recognised that there are elements where sensitivity is reduced, due to intrusion by more modern development at the northern and southern fringes of the LCZ with the settlement. However, there is limited opportunity for mitigation through further development without further intrusion upon the parkland character of the landscape' AoS, Settlement Fringe Sensitivity & LGS Study'.

The point is reiterated in 'Melton Borough Areas of Separation, Settlement Fringe and Local Green Space Study Part 2 (Aug 2016, p122), which states that 'Skylines are open, with long views out from rising topography towards the rolling topography that extends north and west. The open, predominantly undeveloped skylines are extremely susceptible to change.' In respect of the impact on aesthetic and perceptual quality including landscape experience and tranquility, the report goes on further (p123) to say that 'The rural, peaceful character and intact landscape features that contribute to the intact cultural pattern would be susceptible to change.' When summarising, the report concludes that 'Overall landscape sensitivity of this LCZ fringe to residential development is medium to high, due to the sense of separation of the LCZ from the settlement edge and open landscape character. Open skylines associated with this LCZ and the intact landscape pattern to the east are susceptible to change...Due to the visual prominence of the landform associated with the ridgeline, sense of separation of the LCZ from the village and generally well integrated settlement edge there is limited opportunity to accommodate residential development within this LCZ.' (p123).

Based on objective evidence it is clear that any development at GADD2 would have a significant negative impact on the surrounding parkland landscape, beyond anything that could be effectively mitigated.

3. Biodiversity & Geodiversity

In respect of the impact on biodiversity and geodiversity, the selection of the GADD2 site is not appropriate, when considered against other reasonable alternatives. The site selection is also not justified on the basis that its selection has not been informed by research and evidential fact.

'Rural Hubs: Update to site assessments including information on availability of land, suitability of site, viability and deliverability timescales (30/05/17, p147), identifies the GADD2 site as being 'Adjacent to LWS potential GCN.' The report (p148) further identifies a potential significant negative effect in respect of biodiversity and geodiversity.

The GADD2 site has been selected without prior completion of any granular impact assessment on biodiversity or geodiversity, 'Rural Hubs: Update to site assessments including information on availability of land, suitability of site, viability and deliverability timescales' (30/05/17, p137) states that 'A protected species survey and report maybe required due to the current nature of the site.' Whilst recognising that this is also a requirement of actual planning applications, a site cannot reasonably be selected for development where such a review hasn't yet taken place, particularly in the case of GADD2 where the likely impacts on biodiversity and geodiversity were already clearly indicated. Local knowledge would suggest that protected species occupy the GADD2 site, though no assessment has been made of this.

It is recognised that this representation is restricted to commentary on the 'Focussed Changes' only. I would, however, refer back to a point made in representation in December 2016 against the 'Pre-submission Draft Melton Local Plan'. Paragraph 7.2.1 of the Pre-submission Draft Melton Local Plan references an updated Biodiversity and Geo-diversity Study (2015, 2016) of the Borough. Paragraph 7.2.2 however, suggests the study only 'surveyed the suitable site options for development in and around Melton Mowbray and the ten largest villages' to identify where notable areas of significant habitat were present. The Pre-Submission Draft Melton Local Plan does not confirm the ten largest villages, though on the basis of paragraph 4.2.7 these were expected to be Service Centres and not Rural Hubs. Gaddesby, as defined as a Rural Hub, would not be one of these ten largest villages. On this basis, it is not clear how a housing allocation can be proposed for Gaddesby, when the Council's Biodiversity and Geo-diversity Study has not even assessed the impact on the village. Paragraph 7.2.2 is inconsistent, misleading and flawed in its application to Gaddesby village.

In summary, the selection of GADD2 site is not appropriate on the basis of its impact on biodiversity and geodiversity. The site is not justified on the basis that its selection has not been informed by detailed research and evidential fact. The selection of the site is in direct contradiction to the SA objective to conserve and enhance biodiversity and geodiversity in and around the Borough'.

4. Heritage Assets

In respect of the impact on heritage assets, the selection of the GADD2 site is not appropriate, when considered against other reasonable alternatives. The proposed site has a detrimental impact on the cultural pattern of the landscape.

A 'ridge and furrow' field system can clearly be seen at the GADD2 site. This is supported by the 'Melton Borough Areas of Separation, Settlement Fringe and Local Green Space Study' Part 2 (Aug 2016, p122/123), which states 'There is evidence of ridge and furrow field systems and hedgerows are more intact to the east of Rotherby Road, which would be susceptible to change due to potential for impact upon the legibility of the landscape elements.' Further support is identified in the Rural Hubs: Update to site assessments including information on availability of land, suitability of site, viability and deliverability timescales (30/05/17, p146) which states '...there are clearly legible historic field patterns to the north of Gaddesby, identifiable to the north of Pasture Lane. As such, the allocated site represents further encroachment onto this historic landscape.'

The existence of ridge and furrow systems has been sufficient to support removal of other sites proposed within the Melton Local Plan *and even within* Gaddesby itself. The Rural Hubs: Update to site assessments including information on availability of land, suitability of site, viability and deliverability timescales (30/05/17, p156), refers to Leicestershire County Council Archaeology comments (21/02/17) in respect of the original GADD2 site (removed from the MLP at Focussed Change consultation stage); 'The development will impact upon a well preserved landscape of ridge and furrow earthworks providing good evidence of the form and character of the open field system associated with medieval and post-medieval village.' The 'Melton Local Plan Addendum of Focussed Changes: Sustainability Appraisal Addendum (June 2017, p51, paragraph 5.37) further highlights 'As part of the planning application (16/00709/OUT) assessment process undertaken by the Council a technical objection to LONG2, Back Lane, Long Clawson was received. Historic England have objected due to 'the loss of ridge and furrow earthworks and the pasture field (comprising the development area) which would represent harm through setting impact to the significance the scheduled monument and listed buildings'; the site was subsequently removed from allocation. By proposing the GADD2 site, Melton Borough Council is pursuing a methodology of housing application that is inconsistent and flawed.

In summary, the selection of GADD2 site is not appropriate on the basis of its significant negative impact on heritage

assets. The ridge and furrow field system has not been taken in to account nor its potential loss assessed. The selection of the site is in direct contradiction to Policy EN13A of the Pre-Submission Melton Local Plan, which states (p129) that Melton Borough Council will seek 'to ensure the protection and enhancement of Heritage Assets including non-designated heritage assets when considering proposals for development affecting their significance and setting. Proposed development should avoid harm to the significance of historic sites, buildings or areas, including their setting.'

5. Waste

In respect of the impact on waste, the selection of the GADD2 site is not appropriate, when considered against other reasonable alternatives. The 'Melton Local Plan Addendum of Focussed Changes: Sustainability Appraisal Addendum (June 2017, p27, paragraph 4.35) states that 'Residential development sites which are located on brownfield land will involve the reuse of previously developed land and may additionally present opportunities for the reuse of buildings and recycling of materials already onsite.' GADD2 is identified to be on Greenfield land, of high quality grade 3a as identified earlier above. On this basis, paragraph 4.37 states 'The remaining 15 sites are located on Greenfield land and would be unlikely to provide such opportunities meaning a minor negative effect has been recorded for these sites.' The GADD2 site is less appropriate than other sites located on brownfield land.

6. Flood Risk

In respect of the impact on flood risk, the selection of the GADD2 site is not appropriate, when considered against other reasonable alternatives. The proposed site has a negative impact on flood risk.

The flood risk to GADD2 is no different to that of GADD3, the two propose sites separated in distance by one property only (<50 metres). The 'Melton Local Plan Addendum of Focussed Changes: Sustainability Appraisal Addendum (June 2017, p98) states for GADD3 that 'This site is located entirely outside of Flood Zones 3a and 3b (100% of the site is located within flood zone 1) but it is greenfield land; therefore a minor negative effect in relation to flood risk is likely.' The GADD2 site is known to be of heavy clay soil resulting in significant surface water retention and run-off. The impact from any housing allocation at GADD2 is likely to exacerbate this effect, potentially affecting neighbouring properties and biodiversity / geodiversity in turn.

The Pre-submission Melton Local Plan (paragraph 7.22.1) states that 'National planning policy requires a risk based sequential approach to flood risk, avoiding high risk areas and steering development to area of lower risk'. Paragraph 7.22.2 goes on to state that 'As well as managing risk to the development itself, development should not increase flood risk elsewhere and opportunities should be taken to reduce downstream flooding events, for example, by reducing run-off rates'.

Policy EN11 (Pre-Submission Melton Local Plan, p125) states that 'Melton Borough Council will ensure that development proposals do not increase flood risk and will seek to reduce flood risk to others'. Whilst recognising that this is also a requirement of actual planning applications, there is no mention of any attempts to improve drainage facilities for existing properties, in acknowledgement of the impact additional housing allocation would cause. This potential risk has not been properly assessed.

On the basis that there are more suitable lower risk areas than GADD2, the site is considered not to be appropriate and in this respect, at odds with The Pre-Submission Melton Local Plan (paragraph 7.22.1).

7. Settlement Geography

In respect of the impact on the spatial layout of Gaddesby, the selection of the GADD2 site is not justified, when considered against other reasonable alternatives. Gaddesby is a long, linear village, with the main thoroughfare of Main Street and Park Hill covering a considerable distance, linking the southern point with Ashby Road and the northern point with Pasture Lane and Rotherby Lane. On reaching the junction of Park Hill / Rotherby Lane / Pasture Lane, it is clear that you are leaving the settlement for open parkland, with clear distinction between the settlement fringe and the countryside. The GADD2 site extends the settlement even further in a linear fashion, its location such that it is effectively disconnected from the rest of the village. The disconnection of GADD2 from the rest of the settlement is compounded by the fact that it is located north of Pasture Lane, which acts as a boundary to the village. This point is emphasized in the 'Rural Hubs: Update to site assessments including information on availability of land, suitability of site, viability and deliverability timescales (30/05/17, p134); which defines the site as 'slightly detached' and in 'Local Plan Appendix 1: Site allocations and policies' (p45), which states 'The site is situated in the northern edge of the village and therefore slightly detached from the limited services that the village provides.' The term 'slightly detached' is an understatement, GADD2 would be disconnected from the rest of the village, as it is both occupies a position north of Pasture Lane, with no other housing to its north or west and one property only to its east.

The 'Rural Hubs: Update to site assessments including information on availability of land, suitability of site, viability and deliverability timescales' (30/05/17, p133) states that '...the distance to the services in the village (Primary School and Village Hall) is a disadvantage.' The only facilities within the village are the Primary School, the Village Hall and

the Cheney Arms Public House, all located at the entirely opposite southern end of the village. The 'Rural Hubs: Update to site assessments including information on availability of land, suitability of site, viability and deliverability timescales' (30/05/17, p134) identifies the GADD2 site as being located '1km from School and Village Hall'. Moreover, access to services and facilities by foot are deemed to be the case when the distance is less than 800 metres, the footnote on page 134 states 'MfS indicates 800 metres can be walkable'. The GADD2 site is not even therefore in walking distance of the local Primary School, based on Melton Borough Council's own criteria. It cannot be argued that GADD2 is in a sustainable location, if public transport or a car is required to transfer from the proposed site to facilities at the other end of the village.

In summary of the above, the selection of the GADD2 site is not justified when considered against other reasonable alternatives. The site is disconnected from the village, with facilities not even within walking distance.

8. Economy & Employment Opportunity

In relation to its impact on the economy and employment, the selection of the GADD2 site is not justified, when considered against other reasonable alternatives. The proposed housing allocation is not sustainable, based on lack of local employment opportunity.

Gaddesby has extremely limited employment opportunities, these being restricted to the two employers in the village, the Primary School and The Cheney Arms Public House. As has been stated earlier in this representation, both of these facilities are located at entirely the opposite end of a long, linear village to GADD3, with the School further deemed not to even be within walking distance (1km away). The 'Local Plan Appendix 1 Site allocations and policies' (p44) acknowledges this fact, by stating 'The closest employment area is Rearsby Industrial Estate (3km), with some small individual employers close by. ~~The closest employment areas are in Melton Mowbray (over 7km).~~' The small individual employers are assumed to be the Primary School and The Cheney Arms Public House, as there are no others in Gaddesby. The 'strikethrough' text is more accurate, suggesting closest employment areas to be in Melton Mowbray 7km away. The significant distance of GADD3 to employment opportunity is further noted in the 'Rural Hubs: Update to site assessments including information on availability of land, suitability of site, viability and deliverability timescales' (30/05/17, p134), which states 'Employment opportunities in the surrounding area include: 6km John O Gaunt Industrial Estate, 6.2km Melton Airfield, 6.3km Asfordby Storage & Haulage, 6.6km Burrough Court, 6.5km Leicester Road Estate, 6.6km Melton & Kettleby Foods – Samworth Bros, 7.6km Holwell Works, 7.7km Asfordby Business Park, 8.1km Stanton PLC, 6.8km Shoby Lodge Farm, 9km Six Hills Business Area.' This report contradicts the Local Plan Appendix 1 statement, not even acknowledging Rearsby Industrial Estate as an employment opportunity in the surrounding area.

To facilitate access to employment opportunities, The 'Local Plan Appendix 1 Site allocations and policies' (p44) acknowledges that Gaddesby is served by the Centrebus 100 between Leicester and Melton Mowbray throughout the week. In respect of this bus service however, the commentary goes on to state that '...its frequency (every two hours) and the lack of service on Sundays and Bank Holidays should be taken into account when the service is considered with regards to Gaddesby's sustainability (i.e. for accessing Employment as mentioned in the point above)'. The route of the bus from Melton to Leicester once leaving Gaddesby, is via Barsby, South Croxton, Beeby, Barkby, Syston (Brookside), Melton Road (Troon Way) and then Leicester (St Margaret's Bus Station). The route of the bus from Leicester to Melton once leaving Gaddesby is via Ashby Folville, Twyford (Ashby Road), Thorpe Satchville, Great Dalby, Melton Mowbray (Dalby Road) and Melton Mowbray (Windsor Street). *The route both ways does not pass through or even close to any of the employment opportunities identified above, save for Melton Mowbray as the final destination, acknowledged to be over 7kn away.* Moreover, the first bus from Melton leaving at 7.26am and arriving in Gaddesby at 7.49am, doesn't arrive in Leicester (St Margaret's Bus Station) until 8.30am. The last bus leaving Leicester for Melton in the evening is at 17.10pm, arriving in Gaddesby at 17.50pm. These bus times are not regarded as viable for full-time employment in Leicester.

Gaddesby is served by a bus service inadequate both in terms of frequency and route to employment opportunities in the surrounding area (as identified by Melton Borough Council), highlighting the lack of sustainability of housing at the GADD3 site. The housing proposal is not justified on this basis.

It is recognised that this representation is restricted to commentary on the 'Focussed Changes' only. I would, however, refer back to a point made in representation in December 2016 against the 'Pre-submission Draft Melton Local Plan'. To qualify as a 'Rural Hub', a settlement needs to fulfill three of the following four criteria: (1) primary school; (2) access to employment opportunities; (3) fast broadband; and (4) a community building. On the basis of the above, Gaddesby does not have 'access to employment opportunities'. With other criteria not fulfilled, *Gaddesby cannot be considered as a 'Rural Hub' but as a 'Rural Settlement' only.*

9. Education

In respect of the impact on education, the selection of the GADD2 site is not appropriate, when considered against other reasonable alternatives.

As has been argued earlier in this representation, the GADD2 site is located at entirely the opposite end of the village to the Primary School. The 'Rural Hubs: Update to site assessments including information on availability of land, suitability of site, viability and deliverability timescales' (30/05/17, p134) identifies the GADD2 site as being located '...1km from School'. Moreover, access to services and facilities by foot are deemed to be the case when the distance is less than 800 metres, the footnote on page 134 states 'MfS indicates 800 metres can be walkable'. The GADD2 site is not even therefore in walking distance of the local Primary School, based on Melton Borough Council's own criteria. It cannot be argued that GADD2 is a sustainable site, if public transport or a car is required to reach the local School.

The Melton Local Plan Addendum of Focussed Changes: Sustainability Appraisal Addendum (June 2017 p24, Paragraph 4.9) also highlights the need to ensure school places are not exhausted; 'It will be important as part of the development plan process to ensure that existing schools do not become overloaded'. In respect of Gaddesby Primary School however, this would absolutely be the case. The School increased its intake of children from 15 per year to 25 per year in 2014 but with places in these years all filled, Reception and Years 1 and 2 are already at capacity. Within 3 years the school will be at total capacity. This is compounded by the size of the School's catchment area, which includes Barsby, South Croxton, Ashby Folville and reaching almost to Queniborough; the majority of places are filled with children from neighbouring villages. This is acknowledged in the 'Local Plan Appendix 1 Site allocations and policies (p44), which states 'The Primary School is currently has capacity for 210 students, with 78 spare, decreasing yearly until 2020 when projections indicate it is expected to close to capacity'.

It is recognised that this representation is restricted to commentary on the 'Focussed Changes' only. I would, however, refer back to a point made in representation in December 2016 against the 'Pre-submission Draft Melton Local Plan'. To qualify as a 'Rural Hub', a settlement needs to fulfill three of the following four criteria: (1) primary school; (2) access to employment opportunities; (3) fast broadband; and (4) a community building. Whilst Gaddesby clearly has a Primary School in physical terms, it cannot satisfy this criteria practically if there are only school places available for three years of a twenty year Melton Local Plan. A primary school can only fulfill the essential criteria if it can actually accept an intake of children; beyond 2020 Gaddesby Primary School cannot. *On the basis of the above and with other criteria not fulfilled, Gaddesby cannot be considered as a 'Rural Hub' but as a 'Rural Settlement' only.*

In summary of the above, the selection of the GADD2 site is not justified when considered against other reasonable alternatives. The site is disconnected from the Primary School and not even within walking distance. The Primary School will cease to be able to take children in three years time, highlighting the unsustainable nature of the proposed housing allocation.

10. Public Transport

In relation to available public transport, the selection of the GADD2 site is not justified, when considered against other reasonable alternatives. The proposed housing allocation is not sustainable, based on lack of adequate public transport.

As highlighted earlier in this representation, Gaddesby is served by a bus service inadequate both in terms of frequency and route to employment opportunities in the surrounding area (as identified by Melton Borough Council), highlighting the lack of sustainability of housing at the GADD2 site. The infrequency of the bus service reinforces how *disconnected* the GADD2 site is to services, facilities and employment opportunity.

The 'Local Plan Appendix 1 Site allocations and policies' (p45) in respect of GADD2, states that 'The site is situated in the northern edge of the village and therefore slightly detached from the limited services that the village provides. Its access via either of the two well-connected roads and the proximity to the bus stop makes this site a suitable allocation for housing'. To suggest that the site is suitable on the basis of it being located within the vicinity of a bus stop is spurious at best. This tenuous justification is deemed largely irrelevant in any case, when acknowledging that the bus service is inadequate both in terms of frequency and route to employment opportunities in the surrounding area.

The Pre-Submission Draft Melton Local Plan (Paragraph 8.3.3) stated that 'Focusing new development in locations where there are sustainable travel options and the need to travel by car is reduced are important elements of the Spatial Strategy set out in Policy SS2. This approach will also ensure that development is located where it can make the best use of existing resources and facilities'. This statement is a falsehood, the GADD2 site is not located where there are sustainable travel options and consequently, the need to travel by car would actually be *increased*.

Inadequate public transport makes the GADD2 site unsustainable, deeming the proposal unjustified on this basis.

11. General Amenities

In relation to available local amenities, the selection of the GADD2 site is not justified, when considered against other reasonable alternatives. The proposed housing allocation is not sustainable, based on lack of adequate amenities.

Employment opportunity, education, and public transport are all identified earlier in this representation as being deficient, making the GADD2 site unsustainable. In addition to these deficiencies, the nearest convenience store is in East Goscote (3.8 miles away); it is not accessible via public transport from the village and is only open until 6.00pm. The nearest supermarket is in Syston (5 miles away), accessible by bus but only available during the day, once every 2 hours. The fact that these basic shopping facilities are so far away and realistically only accessible for vehicle owners, highlights the existing inadequacy of facilities in Gaddesby. The nearest GP practice and Dentist are also in Syston. The Pre-Submission Draft Melton Local Plan does not recognize the deficiency in amenities relative to the GADD2 site, making it unjustified and unsustainable.

12. Highways

In relation to the suitability of local highways, the selection of the GADD2 site is not justified, when considered against other reasonable alternatives. The proposed housing allocation is not sustainable, based on the inadequacy of local highways to take the anticipated increase in traffic. The proposed site at GADD2 would *exacerbate* existing problems.

The four supply roads in to Gaddesby village (Rearsby Lane, Rotherby Road, Pasture Lane and Ashby Road) are consistent with a rural settlement only. Rearsby Lane is the main access road for the village, connecting it and other through traffic to the A607. The road has a number of tight turns, practically no street lighting and very few pavements until the village is reached, where there is a pavement on one side only. Insufficient parking for the number of patrons of The Cheney Arms Public House means that the road is regularly reduced to a single lane at this point due to parked vehicles (a scenario that continues up Main Street). Drivers frequently speed along Rearsby Lane, which continues on to Ashby Road. Ashby Road continues on to the village of Ashby Folville, exiting Gaddesby past the Primary School. Traffic is bad during peak periods due to insufficient parking at the school.

Rotherby Road to the north of the village connects to the A607; this is a single width road for much of its length. It is not lit and comprises of many tight corners. Many residents of the village avoid using it for these reasons. Pasture Lane starts at a junction with Rotherby Road and alongside the GADD2 site; it connects to the A607 close to Melton Mowbray, four miles from Gaddesby Village. It is unlit and has a number of tricky corners. It is not uncommon to meet oncoming traffic on the wrong side of the road or going faster than the road should safely allow.

All of these four connecting roads are popular with large groups of cyclists, horse riders and slow moving farm machinery / wide loads, which create further hazards and traffic restrictions. All four roads have a weight limit of only 7.5 tonnes further emphasising their low capacity. The village relies on these four access points for all transportation and already suffers with volumes of traffic at peak times. The GADD2 site would inevitably bring additional vehicles, given the lack of effective public transport. It is not unreasonable to assume a further two cars per household, totalling 22 additional vehicles (a further 22 more based on the 11 house proposed allocation at the GADD3 site). This represents a huge increase for a small rural settlement. The proposed GADD2 and GADD3 sites allocations would place significant further strain on an already inadequate local highways infrastructure.

Rearsby Lane connects to the A607, already a very busy road which links through to the A46. Both these roads are already over capacity. It is not unusual in the early morning to be queuing from Syston / Queniborough / East Goscote all the way to the A46 (referred to locally as the 'Hobby Horse Roundabout'). The junction between Rearsby Lane and the A607 is very dangerous and one sometimes has to wait minutes to join the main road.

The two roads closest to GADD2 (Rotherby Road and Pasture Lane) are both unsuitable for more than the occasional vehicle and certainly not suitable for any heavy vehicles such as buses and lorries. These roads are not 'well-connected' but in fact highly restrictive, dangerous in some weather conditions, and not capable of supporting additional vehicles.

The main access for properties at the northern end of the village is Pasture Lane for traffic approaching from Melton Mowbray, or Rearsby Lane, via Main Street and Park Hill from Leicester. Main Street is often reduced to a single lane with overflow parking of pub patrons and also from the vehicles belonging to residents of Main Street who do not have off-road parking. Park Hill is as its name implies is a steep hill. Vehicles naturally increase in speed travelling down the hill due to its steepness. By the same token, vehicles ascending tend to accelerate to get up the hill. There is only one footpath along Park Hill which is on the opposite (west) side to the main body of housing at Paske Avenue and Barrow Crescent and indeed GADD2. When walking children to school parents have to cross the road to the footpath which is dangerous because of the speed of the traffic. There are also a number of concealed entrances along Park Hill. The Centrebus 100 service currently uses Paske Avenue to turn around and head back down Park Hill to continue its route. This creates a traffic risk, as Paske Avenue is a narrow road with many vehicles often parked on it and really unsuitable for large vehicles such as buses.

Whilst it is acknowledged that existing highways problems cannot be resolved by new developments, neither should it be the case that new housing proposals make existing problems worse. The proposed site at GADD2 would *exacerbate* existing problems. The proposed housing allocation is not sustainable, based on the further inadequacy of

local highways to take the anticipated increase in traffic. In relation to the suitability of local highways therefore, the selection of the GADD2 site is not justified, when considered against other reasonable alternatives.

13. Rural Settlement Vs Rural Hub

It is recognised that this consultation is restricted to commentary on the 'Focussed Changes' only.

I would, however, refer back to a point made in representation in December 2016 against the 'Pre-submission Draft Melton Local Plan and highlighted in the points above. To qualify as a 'Rural Hub', a settlement needs to fulfill three of the following four criteria: (1) primary school; (2) access to employment opportunities; (3) fast broadband; and (4) a community building. This representation has reiterated again that Gaddesby cannot be considered as a 'Rural Hub' but as a 'Rural Settlement' only, with housing incorrectly allocated as a result.

The Pre-Submission Draft Melton Local Plan (paragraph 4.2.4) states that 'The roles of the town and villages in the Borough were reviewed following the Emerging Options consultation, and a revised approach adopted'. In the first iteration of the Draft Melton Local Plan, Gaddesby was classified as a 'Rural Supporter', in the Pre-Submission Draft Melton Local Plan the village has been upscaled to become a 'Rural Hub'. A Rural Supporter was identified in the 'Melton Local Plan Settlement Roles and Relationships' (April 2015) by a clear scoring methodology based on 42 criteria, with role and function of settlements and role and spatial analysis. The scoring criteria used was much more extensive and sophisticated, in comparison to the four criteria only used in the 'Pre-Submission Draft Melton Local Plan' (paragraph 4.2.4), which appear to be much more of a blunt tool in evaluating village classification. Scoring only 12 points, Gaddesby was very much at the lower end of the Rural Supporter range of 10 to 20. Gaddesby is akin to a rural settlement only. Gaddesby compares in size and facilities with its neighbour Ashby Folville, yet Gaddesby is classified as a Rural Hub and Ashby Folville a Rural Settlement. The change in classification between iterations of the Draft Melton Plan is not clear and transparent with no clear reasoning presented as to the re-classification of Gaddesby. The scoring is furthermore inconsistent at best, with similar villages being classified entirely differently.

The Pre-Submission Draft Melton Local Plan (paragraph 4.2.4) sets out the four 'essential criteria' for identifying settlements relating to service and facility provision; (1) Primary school; (2) Access to employment opportunities; (3) fast broadband; and (4) A community building. Paragraph 4.2.5 states that 'The essential criteria have been used to distinguish between the proposed Service Centres and Rural Hubs. A Service Centre must have all 4 of the essential criteria, whilst Rural Hubs must have at least 3 out of 4, with one of those being a primary school'. Gaddesby village *does not* qualify for the Rural Hub status that it has been allocated, as it *does not* fulfill at least 3 of the 4 essential criteria.

Gaddesby has only two employers, these being the Primary School and The Cheney Arms Public House. As identified above, access to realistic employment opportunity is 6-8km away from the village. Whilst Gaddesby clearly has a Primary School in physical terms, it cannot satisfy this criteria practically as there are only school places available for three years of a twenty year Melton Local Plan. A primary school can only fulfill the essential criteria if it can actually accept an intake of children; beyond 2020 Gaddesby Primary School cannot. Failure to fulfill both of these criteria relegates Gaddesby to Rural Settlement status only.

In respect of 'fast broadband', Gaddesby's phone exchange was 'upgraded' in 2016 as part of the "Super-fast" Leicestershire programme. It has added support for Fibre to the Cabinet broadband. There isn't a lot of choice of provider; the majority of residents are using BT. This broadband service is sold as "up to" 56Mbps download speed, which is more than adequate for an average modern home. The actual delivered speed was tested at the time of Pre-submission Draft Melton Local Plan representations in December 2016 and confirmed as 20Mbps, or 35.7% of the advertised maximum, which is the same as the pre-upgrade ADSL offering. Although there is fibre optic to the exchange there is none from the exchange. Gaddesby cannot be considered to comply with this essential criteria on this basis. Given this failure to perform under the existing load of the village and surrounding areas, any additional load (resulting from GADD2 / GADD3) is likely to deteriorate the service further. Many existing residents have not yet upgraded to fibre broadband either, which would further increase the load. In the neighbouring Village of Queniborough, the broadband speeds can be over double the delivered speed in Gaddesby. Super "fast" broadband in Gaddesby is barely effective. Evidence of a poor broadband service further contradicts paragraph 6.9.4 in the Pre-Submission Draft Melton Local Plan; 'increased homeworking and small business start-ups are anticipated over the plan period, particularly in light of improvements in broadband speeds', providing further evidence in support of lack of access to employment opportunities outlined above.

Gaddesby has a village hall and therefore fulfills the criteria of possessing a community building.

Gaddesby only fulfils one of the four criteria to qualify it as a Rural Hub. Table 2 in the Pre-Submission Draft Melton Local Plan suggests 'Rural Hubs are a village or a group of villages which share a range of essential and important local services which serve the basic needs of people living within them and in nearby settlements, which can be accessed by cycling and walking...These villages will have 3 out of the 4 essential services...and a range of other facilities, or easy access to them, in nearby settlements'. Gaddesby does not share local services / a range of other facilities with nearby settlements and nearby settlements cannot be accessed by cycling or walking due to distance.

Paragraph 5.11.2 of the Pre-Submission Draft Melton Local Plan outlines the services considered within the annual 'audit of village services by Melton Borough Council, as follows: -

- education facilities (nursery and primary school and secondary school)
- local shops, post offices and petrol stations / garages
- health care facilities (general medical practice, dentist and pharmacy)
- community facilities (village hall, public house, library, sport and leisure groups and places of worship)
- transport facilities (a regular 6 day a week bus service)
- opportunities of employment in other businesses
- allotments

Of the above list, Gaddesby only has a primary school, a village hall, a public house and a church, further emphasising its existence as a rural settlement only and not a Rural Hub.

In summary of the above, Gaddesby only fulfils one of four criteria and should therefore be considered as a Rural Settlement rather than a Rural Hub. The proposed housing allocation of 36 properties (GADD1 14, GADD2 11 and GADD3 11) should be revised accordingly.

In conclusion of this representation, I regard this focused change to be unsound on the basis that the GADD2 housing allocation is not justified. GADD2 is not the most appropriate allocation when considered against other reasonable alternatives.

11. 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

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

Following an email exchange between 9th and 23rd July 2017 with Mr Jim Worley, Head of Regulatory Services, Melton Borough Council, it was confirmed that my earlier representations on the pre-submission draft Melton Local Plan (MLP) submitted in December 2017 were overlooked and not included at that point. It was further confirmed that the points raised in my representations were not considered by Councillors when reviewing the evidence ahead of the extraordinary council meeting held on 4th July 2017, when approval was given to progress with the 'Focussed Changes'. Failure to consider my representations prior to decisions made to progress the plan on the 4th July, means that Councillors have made decisions on the basis of incomplete / missing evidence at that point. I regard this as unsound decision making and not in keeping with the spirit of the 'duty to co-operate'. I am not sure if other representations have been 'missed' (I could only see three responses to my partner Caroline Stuart's representations), but the lack of a robust governance process does not instil me with confidence that this is not in fact the case. I am still awaiting the outcome of Mr Worley's investigation in to this matter, advising what went wrong in the process.

On the basis of the above I remain concerned as to the transparency of the consultation process and the collation of evidence from representations. In light of this I am keen to participate at the oral examination to ensure the points made in my representations are conveyed to the Inspector.

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.

PLEASE CONTINUE TO NEXT PAGE TO COMPLETE THE REST OF THE FORM

PART C

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	<input checked="" type="checkbox"/>	Planning Agent/Planning Consultant	<input type="checkbox"/>
Developer	<input type="checkbox"/>	Utility/Service Provider	<input type="checkbox"/>
Government Organisation	<input type="checkbox"/>	Amenity Group	<input type="checkbox"/>
Other Organisation	<input type="checkbox"/>	Residents Group	<input type="checkbox"/>
Business	<input type="checkbox"/>	Town/Parish Council	<input 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 do not 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 checked="" type="checkbox"/>	Online services	<input type="checkbox"/>	Waste and recycling	<input type="checkbox"/>