



Mr Jorge Fiz Alonso
Melton Borough Council
Planning Policy, Parkside
Station Approach, Burton Street
Melton Mowbray
Leicestershire
LE13 1GH

Direct Dial: 0121 625 6893

Our ref: PL00793387

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Dear Mr Fiz Alonso

MELTON BOROUGH COUNCIL LOCAL PLAN PARTIAL UPDATE - ISSUES AND OPTIONS CONSULTATION (NOVEMBER 2023)

Thank you for the opportunity to engage with the Local Plan review at this early stage. As the Government's adviser on the historic environment, Historic England (HE) is keen to ensure that the conservation and enhancement of the historic environment is fully taken into account at all stages and levels of the planning process.

We have set our responses to the consultation questions out below and responses are made in relation to our remit for the historic environment. As such, we have no comment to make on some of the consultation questions, and we note that an update is not needed for Policy EN13: Heritage Assets. We have not had capacity to comment on the SA Scoping report at this time but would be happy to provide specific comments in due course if that would be helpful.

Notwithstanding that, we would wish to reserve right to make comments in relation to any matters emerging in future iterations of the Plan, and the accompanying SA, as they progress.

Vision and Objectives

Q1. Preferred option. Relating to Option 1 which would entail no change to the current vision and objectives and Option 2 which would streamline these.

Option 1 - neither agree nor disagree

Option 2 (Council's preferred option) - somewhat disagree

Q2. Response explanation.

Option 1 would retain a specific focus for the conservation of the historic environment and the Borough's heritage assets, and their setting. Option 2 would not include this as a key focus which we consider would not demonstrate a positive approach to the



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historic environment within the Plan process.

The historic environment and heritage assets play a key part within all the seven key issues identified in Option 2 whether that be heritage led regeneration in a place (rural community or town centre), repurposing existing fabric rather than demolition and new build as part of climate change considerations, heritage contributions to local distinctiveness which link in to design codes and high quality, well-designed development, links between heritage and well-being, and synergy between natural and historic environments where opportunities that link the strands could result in transformational outcomes for a community and its place.

Q3. Top 3 most important objectives.

Other - HE welcomes the seven key issues identified which are clearly of importance to the Borough. However, it our view that the historic environment, heritage assets and their setting should also form a key issue as they are an intrinsic part of the seven key issues already identified.

Policy SS1: Presumption in favour of Sustainable Development

Q4. Preference around options to delete or amend the policy.

Option 1 - neither agree nor disagree.

Option 2 (Council's preferred option) - somewhat agree.

Q5. NPPF requirements for sustainable development include those relating to the historic environment, so whilst option 2 would be more tidy, either option would address historic environment matters in the round.

Policy SS3: Sustainable Communities (unallocated sites)

Q6. Consider options.

Option 1 - Delete the policy - strongly disagree.

Option 2 - Review to better define meeting local need - neither agree nor disagree.

Option 3 - Review to enhance wider sustainability (Council's preferred option) - somewhat agree.

Q7. Explain response - Deleting the policy would remove the Borough's existing clear aspirations for new speculative development and may result in unwarranted harm to the historic environment, heritage assets or their setting. A review as set out in Option 3 would seem more in line with the current aspirations of the Borough, and would continue to address historic environment elements.



Q8. No comment.

Q9. No comment.

Policy SS4: South Melton Mowbray Sustainable Neighbourhoods

Q10. Consider options.

Option 1 - Delete the policy - strongly disagree.

Option 2 - Amend the policy to reflect the 2021 Masterplan (Council's preferred option) - somewhat agree.

Q11. Explain response.

The requirements of Policy SS4 en3 in respect of the historic environment, especially the setting of St Mary and St Lazarus Hospital Scheduled Monument (SM) and associated landscape connections and opportunities to enhance, better understand and experience the monument are a key part of what makes this area of development unique and a special place to live. As such, HE considers some policy safeguards for this should continue to be reflected through any new Local Plan.

Policy SS5: Melton Mowbray North Sustainable Neighbourhood

Q12. Consider options.

Option 1 - Delete the policy - strongly disagree.

Option 2 - Amend the policy to reflect the 2021 Masterplan (Council's preferred option) - somewhat agree.

Q13. Explain response.

HE considers some policy safeguards for the historic environment and heritage assets should continue to be reflected through any new Local Plan.

Policy SS6: Alternative Development Strategies and Local Plan Review

Q14. Consider Options.

Option 1 - Delete the policy - neither agree nor disagree.

Option 2 - Reduce to locally specific criteria only (Council's preferred option) - neither agree nor disagree.

Option 3 - Include additional criteria - neither agree nor disagree.

Q15. Explain response.





No key change for the historic environment as a result of the three options.

Policy C2: Housing Mix

Q16. No comment - outside HE remit.

Q17. No comment - outside HE remit.

Policy C3: National Space Standard and Smaller Dwellings

Q18. Consider options.

Option 1 - Delete the policy - neither agree nor disagree.

Option 2 - Amend the policy (Council's preferred option) - neither agree nor disagree.

Q19. Explain response.

HE would recommend the Council considers appropriate wording in any new policy which perhaps focuses the requirement for Nationally Described Space Standards (NDSS) to affordable housing or dwellings of more than three bedrooms as suggested, or that could provide for any change of use of an historic building to residential use where habitable space may not meet the NDSS requirements, for example units over shops.

Policy C4: Affordable Housing Provision

Q20. Consider options - No comment, outside HE remit.

Q21. Explain response.

Any requirements for affordable housing provision would need to meet other material considerations at application stage, including those for this historic environment so HE has nothing to add for Q20.

Policy C7: Rural Services

Q22. Consider options.

Option 1 - Delete the policy - strongly disagree.

Option 2 - Amend the policy (Council's preferred option) - somewhat agree.

Q23. Explain response.



HE agrees with the Council that a policy pertaining to rural services should be maintained in a new plan in some form, and should be extended to include the whole of the Borough. We are of the view that a relevant policy should continue to be included in any new plan to ensure settlements in the Borough are viable and attractive places to work, live and play, all of which can contribute to the enhancement and enjoyment of the local historic environment whether it falls within a Conservation Area or otherwise.

Policy C8: Self Build and Custom Build Housing

Q24. Consider options - No comment, outside HE remit.

Q25. Explain response.

Any requirements for such housing provision would need to meet other material considerations at application stage, including those for this historic environment so HE has nothing to add for Q24.

Policy C9: Healthy Communities

Q26. Consider options.

Option 1 - Delete the policy - strongly disagree.

Option 2 - Amend the policy to run throughout the Plan (Council's preferred option) - strongly agree.

Q27. Explain response.

Heritage can make a valuable contribution to well being in a variety of forms. He would welcome a revised policy that allowed synergy with other policies and key issues identified in the Plan as it progresses, especially the historic environment. We have undertaken various research into the subject and further information can be found on the links below. You may wish to consider some of the heritage counts information as possible monitoring criteria in the Sustainability Appraisal as the Plan progresses:

<https://historicengland.org.uk/images-books/publications/wellbeing-and-the-historic-environment/>

<https://historicengland.org.uk/research/current/social-and-economic-research/wellbeing/>

Q28. HIA's for large scale developments



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No comment, outside HE remit.

Q29. Size and types for HIA's

No comment, outside HE remit.

Policy EC1: Employment growth in Melton Mowbray

Q30. Consider options

Option 1 - Delete the policy - strongly disagree.

Option 2 - UCO amendments, new evidence and NPPF updates- somewhat agree

Option 3 - Separate policies for employment allocations and employment development in Melton Mowbray - somewhat agree.

Q31. Explain response.

HE would object to the policy being deleted as it would be a fundamental part of the Plan. We would have no issues to raise should Option 2 or 3 be pursued as the Plan progresses as the historic environment would be dealt with elsewhere in the Plan and would remain as a material consideration for site allocations and development proposals.

Q32. Call for employment sites.

HE has no sites to put forward for consideration within the Plan. However, we would recommend that site assessment work is undertaken in line with our guidance set out in Historic Environment Advice Note 3: The historic environment and site allocations in local plans - <https://historicengland.org.uk/images-books/publications/historic-environment-and-site-allocations-in-local-plans/>

Policy EC2: Employment Growth in the Rural Area (outside Melton Mowbray)

Q33. Consider options.

Option 1- Delete the policy - strongly disagree.

Option 2 - Revised policy wording (Council's preferred option) - somewhat agree.

Q34. Explain response.

We agree with the Council's suggestion that the policy is not deleted for the reasons set out in section 15.3 for Option 1. Whilst Option 2 may broaden the policy, supporting justification text for the policy within the Plan would offer opportunity to highlight the special qualities of the rural area within the Borough. For example,





including how the historic rural activity within the Borough has shaped some of the tourist and business activity experienced today.

Policy EC3: Existing Employment Sites

Q35. Consider options.

Option 1 - Delete policy - strongly disagree.

Option 2 - Include use classes - somewhat disagree.

Option 3 - Add flexibility to the policy - somewhat agree.

Q36. Explain response

We would have no issues to raise should Option 3 be pursued as the Plan progresses as the historic environment would be dealt with elsewhere in the Plan and would remain as a material consideration for site allocations and development proposals.

Policy EC4: Other employment and mixed-use proposals

Q37. Consider options.

Option 1 - Delete policy - strongly disagree.

Option 2 - Revised wording and define mixed-use development - neither agree nor disagree.

Option 3 - Split the policy - somewhat agree.

Q38. Explain response.

HE is of the view that the current policy wording clearly sets out expectations for development proposals and these should be incorporated into any new policy or policies.

Town Centre and Retail Evidence

Q39. Consider options.

Option 1 - Melton Mowbray town centre focus - neither agree nor disagree.

Option 2 - Borough wide town centre and retail study- neither agree nor disagree.

Q40. Explain response.

We would suggest that funding opportunities for future place making/levelling up/other projects be taken into consideration when deciding the approach for retail evidence for the Plan. Refreshed evidence may assist with any funding applications the Council





wishes to make during the Plan period. We provide further information about town centres on our website: <https://historicengland.org.uk/advice/planning/historic-towns-and-high-streets/>

Policy EC5: Melton Mowbray Town Centre

Q41. Consider options.

Option 1- Delete the policy - strongly disagree.

Option 2 - Update to include elements of the Town Centre Vision (Council's preferred option) - somewhat agree.

Q42. Explain response.

HE agrees with the Council that a policy on this aspect is necessary within the new Plan. Option 2 would provide opportunity to link in with the town centre vision and perhaps highlight the heritage of the town and its special qualities.

Policy EC6: Primary Shopping Frontages

Q43. Consider options

Option 1 - Delete policy- strongly disagree

Option 2 - Amend the policy (Council's preferred option) - strongly agree

Q44. Explain response.

A refreshed primary shopping frontage policy would help conserve and enhance the historic environment, heritage assets and their setting.

Policy EC7: Retail development in the Borough

Q45. Consider options

Option 1 - Delete policy- strongly disagree

Option 2 - Amend the policy (Council's preferred option) - strongly agree

Q46. Explain response.

A refreshed policy would help conserve and enhance the historic environment, heritage assets and their setting.

Policy EC8: Sustainable tourism



Q47. Consider options

Option 1 - Delete policy - strongly disagree.

Option 2 - Focus on socio-economic benefits - neither agree or disagree.

Option 3 - Amend to include sustainable tourism - strongly agree

Q48. Explain response.

Heritage led tourism contributes towards the UK economy:

<https://historicengland.org.uk/research/heritage-counts/heritage-and-economy/visitor-economy/> Amending the policy to include sustainable tourism offers opportunity to explore further opportunities to make use of the Borough's historic environment and special qualities. This also links in with comments raised previously in relation to the Vision and Objectives of the Plan.

Policy EN2: Biodiversity and geodiversity

Q.49. Consider options.

Option 1 - Delete policy - strongly disagree.

Option 2 - Amend the policy - neither agree nor disagree.

Option 3 - Split the policy - somewhat agree.

Q.50. Explain response.

HE would welcome a split policy approach as the elements are quite different.

The historic environment plays an important role in nature recovery. We work with other partners in relation to Countryside Stewardship, woodland management and other projects where nature recovery aligns with the historic environment. Further information can be found via our website:

<https://historicengland.org.uk/advice/technical-advice/monuments-and-sites/wildlife-and-habitat-protection/>

The various elements of geodiversity underlie and define the character of our landscape and environment. A split policy approach would provide opportunity to link align historic environment matters with a range of issues including local distinctiveness as a result of building materials, historic landscape characterisation etc.

Policy EN3: The Melton Green Infrastructure Network

Q.51. Consider options.

Option 1 - Delete policy - strongly disagree.



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Option 2 - Amend the policy (Council's preferred option) - somewhat agree.

Q.52. Explain response.

The Borough's green infrastructure network includes opportunities to link with the historic environment. HE would expect any revised policy to maintain the references to heritage assets and setting that are made in the extant policy.

Policy EN5: Local Green Spaces

Q.53. Consider options.

Option 1 - Delete policy - somewhat disagree.

Option 2 - Include Green Belt criteria - neither agree nor disagree.

Option 3 - Designate additional Local Green Spaces - somewhat agree.

Q54. Explain response.

No further comments to make.

Q.55. New Local Green Space - HE has no suggestions to put forward.

Policy EN7: Open space, sport and recreation

Q.56. Consider options - No comment, outside HE remit.

Q.57. Explain response - No comment, outside HE remit.

Policy EN8: Climate change

Q.58. Consider options.

Option 1- Delete policy - strongly disagree.

Option 2 - Delete the policy and include climate change as a 'core thread' to run through the plan - somewhat disagree.

Option 3 - Update Policy EN8 and make climate change a 'core thread' that runs through the Plan (Council's preferred option) - strongly agree.

Q.59. Explain response.

The historic environment can play a valuable part in the route to net zero. One of HE's corporate objectives relates to climate change and it is a key part of our work:

<https://historicengland.org.uk/advice/climate-change/> Updating the extant policy and including climate change as a thread through the Plan would ensure that opportunities

could be included in relation to many Plan topics. We would expect this to be explored further in the SA as the Plan and SA progress.

Policy EN9: Ensuring energy efficiency and low carbon development

Q.60. Consider options.

Option 1 - Delete the policy - strongly disagree.

Option 2 - Refocus the policy and split into other policies (align with revised extant or new policies) (Council's preferred approach) - somewhat agree.

Option 3 - Include further standards within a policy - neither agree nor disagree.

Q.61. Explain response.

The historic environment offers opportunity to explore creative and innovative ways to ensure energy efficiency and low carbon development. We would recommend any approach taken forward continues to consider the historic environment to ensure the Plan can demonstrate a positive approach to the historic environment.

Policy EN10: Energy generation from renewable and low carbon sources

Q.62. Consider options.

Option 1 - Delete the policy - strongly disagree.

Option 2 - Review the policy to encompass all types of renewables - strongly agree.

Q.63. Explain response.

Historic England supports an approach to renewable energy generation which:

- Acknowledges the need for society to invest in a wide range of renewable energy generation technologies
- Recognises the potential environmental impacts of different technologies, including their implications for the historic environment
- Keeps the balance of environmental benefits and disadvantages of each technology under continual review
- Continually seeks to limit and mitigate adverse impacts.

Further information on links between the renewables and the historic environment can be found on our website:

[<https://historicengland.org.uk/advice/planning/infrastructure/renewable-energy/>](https://historicengland.org.uk/advice/planning/infrastructure/renewable-energy/)

Policy EN11: Minimising the risk of flooding

Q.64. Consider options.



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No comments to make as context of flood risk matter included in the policy is outwith HE's remit.

Q.65. Explain response.

No comments to make as context of flood risk matter included in the policy is outwith HE's remit.

Policy EN12: Sustainable drainage systems

Q.66. Consider options.

Option 1 - Delete policy - somewhat disagree.

Option 2 - Include additional requirements - somewhat agree.

Q.67. Explain response.

SuDS can contribute to existing public realm and new development proposals and can link well with historic environment elements including heritage assets or their setting. Including a policy on this would add to the Vision and Objectives of the Plan review.

Policy IN1: Melton Mowbray Transport Strategy

Q.68. Consider options.

No comments to make as the questions relating to the policy are outwith HE's remit.

Q.69. Explain response.

No comments to make as the questions relating to the policy are outwith HE's remit.

Policy IN2: Transport, Accessibility and Parking

Q.70. Consider options.

No comments to make as the questions relating to the policy are outwith HE's remit.

Q.71. Explain response.

No comments to make as the questions relating to the policy are outwith HE's remit.

Policy IN4: Broadband

Q.72. Consider options.





Option 1 - Delete the policy - strongly disagree.

Option 2 - Amend the policy (Council's preferred approach) - strongly agree.

Q.73. Explain response.

The Covid19 pandemic introduced new ways of working, particularly in respect of homeworking. This, in turn, has changed shopping habits and the use of local services which can contribute to the vitality and sustainability of settlements. Maintaining and increasing the offer of services in settlements contributes towards an appreciation of the place's heritage and creates a sense of place.

Policy D1: Raising the standard of design

Q.74. Consider options.

Option 1 - Delete the policy - strongly disagree.

Option 2 - Amend and strengthen the policy (potential split to create policies) (Council's preferred approach) - strongly agree.

Q.75. Explain response.

Based on past and current research and workstreams, as well as corporate objectives, HE is well-placed to play a leading role in promoting high-quality design in historic places and we continue to research into this subject. We have provided advice on design coding in historic environments and increasing housing density in historic environments amongst others. Further information can be found on our website: <https://historicengland.org.uk/advice/planning/design-in-the-historic-environment/>

Q.76. Any additional design criteria to add?

HE has nothing to add to the extant policy items as they currently provide for the historic environment.

Q.77. Design considerations for new development.

Attractiveness - very important

Sensitive to context - very important

Distinctiveness - very important

Neighbour amenity - very important

Legible places - very important

Connectedness - very important

Comprehensive development - very important

Safe and attractive streets and spaces - very important





Environmental sustainability and adapting to climate change - very important
Mix of uses - very important
Protecting or enhancing heritage assets - very important
Car parking - very important
Community consultation - very important

Q.78. Specific policy guidance about the use of design coding within the new Plan

This could be achieved within the Plan review or potentially as a separate development plan document.

Q.79. Explain response.

Should the Council consider various approaches to design coding might be used such as by a developer for a specific scheme or through a Neighbourhood Plan then an overarching policy could be of use in setting out expectations.

We hope that these comments are of use to you at this time. Should you have any queries, please do not hesitate to contact me.

Yours sincerely,

Rosamund Worrall

