

Gladman House, Alexandria Way
Congleton Business Park
Congleton, Cheshire
CW12 1LB

T: 01260 288800
F: 01260 288801

www.gladman.co.uk

By email only to: PlanningPolicy@melton.gov.uk.

RE: Broughton and Old Dalby Neighbourhood Plan Regulation 16 Consultation

Dear Sir/Madam,

This letter provides Gladman Developments Ltd (Gladman) representations in response to the submission version of the Broughton and Old Dalby Neighbourhood Plan (BODNP) under Regulation 16 of the Neighbourhood Planning (General) Regulations 2012. The Parish Council and Melton Borough Council (MBC) are aware of the land interests of Gladman within the parish and the proposed new village at Six Hills, which is the focus of these representations.

Gladman note that the foreword to the Neighbourhood Plan currently references the new Garden Village proposal at Six Hills as speculative and not warranting further consideration until a review of the plan. Whilst it is correct the forthcoming application is speculative, a principal function of this application is to demonstrate the absence of constraints to development in support of the promotion of the site through the emerging Local Plan.

The BODNP is being prepared in accordance with both the adopted and emerging Local Plan, the latter of which does identify the site at Six Hills as a potential future development location under Policy SS6. This policy has retained Six Hills as a site option in the recent Local Plan Focussed Changes Consultation completed by the Council in August in advance of the submission of the Plan. In the context of paragraph 216 of the Framework, the emerging Local Plan is well advanced and whilst significant objections to it exist, there are no objections to the inclusion of Six Hills within Policy SS6.

Any decision on Six Hills would be taken in a strategic context beyond that of the BODNP and the development identified in it to meet local needs. Whilst we therefore acknowledge and accept the approach of the BODNP not to consider the site at this point in time, we consider the BODNP should make reference to emerging policy SS6 and Six Hills and, in particular, for the Plan to make clear that a decision on the principle of any development at Six Hills would be taken in the context of the emerging Local Plan (when adopted) and the material consideration of the emerging Leicestershire Strategic Growth Plan.

Further, and as is set out in these representations, as the decision will be taken in a strategic context a review of the BODNP need not be triggered, as is currently proposed in the foreword; the principle of development and its parameters would have already been established.

Through these representations Gladman suggest several modifications to the plan as currently proposed that would help to improve the plan and ensure a robust plan that could adapt to rapid change, such as the development at Six Hills being necessary to help the Council meet unmet housing needs in the wider HMA.

Legal Requirements

Before a neighbourhood plan can proceed to referendum it must be tested against a set of basic conditions set out in paragraph 8(2) of Schedule 4b of the Town and Country Planning Act 1990 (as amended). The basic conditions that the BODNP must meet are as follows:

- (a) Having regard to national policies and advice contained in guidance issued by the Secretary of State, it is appropriate to make the order.*
- (d) The making of the order contributes to the achievement of sustainable development.*
- (e) The making of the order is in general conformity with the strategic policies contained in the development plan for the area of the authority (or any part of that area).*
- (f) The making of the order does not breach, and is otherwise compatible with, EU obligations.*

National Planning Policy Framework and Planning Practice Guidance

The National Planning Policy Framework (the Framework) sets out the Government's planning policies for England and how these are expected to be applied. In doing so it sets out the requirements for the preparation of neighbourhood plans to be in conformity with the strategic priorities for the wider area and the role in which they play in delivering sustainable development to meet development needs.

At the heart of the Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that plan makers should positively seek opportunities to meet the development needs of their area and Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change. This requirement is applicable to neighbourhood plans.

The application of the presumption in favour of sustainable development will have implications for how communities engage with neighbourhood planning. Paragraph 16 of the Framework makes clear that Qualifying Bodies preparing neighbourhood plans should develop plans that support strategic development needs set out in Local Plans, including policies for housing development and plan positively to support local development.

Paragraph 17 further makes clear that neighbourhood plans should set out a clear and positive vision for the future of the area and policies contained in those plans should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency. Neighbourhood plans should seek to proactively drive and support sustainable economic development to deliver the homes, jobs and thriving local places that the country needs, whilst responding positively to the wider opportunities for growth.

Paragraph 184 of the Framework makes clear that local planning authorities will need to clearly set out their strategic policies to ensure that an up-to-date Local Plan is in place as quickly as possible. The Neighbourhood Plan should ensure that it is aligned with the strategic needs and priorities of the wider area and plan positively to support the delivery of sustainable growth opportunities.

Planning Practice Guidance

It is clear from the requirements of the Framework that neighbourhood plans should be prepared in conformity with the strategic requirements for the wider area as confirmed in an adopted development plan. The requirements of the Framework have now been supplemented by the publication of Planning Practice Guidance (PPG).

On 11th February 2016, the Secretary of State (SoS) published a series of updates to the neighbourhood planning chapter of the PPG. In summary, these update a number of component parts of the evidence base that are required to support an emerging neighbourhood plan.

On 19th May 2016, the Secretary of State published a further set of updates to the neighbourhood planning PPG. These updates provide further clarity on what measures a qualifying body should take to review the contents of a neighbourhood plan where the evidence base for the plan policy becomes less robust. As such it is considered that where a qualifying body intends to undertake a review of the neighbourhood plan, it should include a policy relating to this intention which includes a detailed explanation outlining the qualifying bodies anticipated timescales in this regard.

Relationship to Local Plans

The current development plan that the neighbourhood plan will be tested for conformity against is the Melton Local Plan 1999. This plan is considerably time expired against the requirements of the Framework and as such Gladman welcome that the neighbourhood plan is paying regard to the emerging strategic direction of the new Melton Local Plan.

MBC have recently consulted on focused changes to the Melton Local Plan, prior to this plan being submitted for examination and whilst the approach identified is yet to be tested, MBCs preferred approach is clear and Six Hills is to be retained as a potential future development location. Gladman have submitted detailed representations throughout the preparation of the new Local Plan and, whilst supporting the inclusion of Policy SS6 and the inclusion of Six Hills within the new Local Plan, we have suggested this could be taken further by MBC and that Six Hills as a deliverable site in a strategic location should be allocated now.

In the event Six Hills is not directly allocated through the Local Plan and it remains a reserve site, Gladman remain committed to the site and we are of the opinion Six Hills could accommodate some of the very significant unmet housing needs identified in the wider HMA in Leicester City, Charnwood and Oadby and Wigston. The extent of the unmet need will be distributed through the preparation of the Strategic Growth Plan (SGP) by Leicester and the Leicestershire and Gladman has sought for this Plan to be referenced in Policy SS6. Such an approach was recently advocated by North West Leicestershire in the course of the examination of their Local Plan, and so it is not a controversial or unsound approach and one would expect an Inspector on the Melton Local Plan to favour a consistent approach across the Leicestershire local authorities.

Therefore, for the purposes of consistency with the emerging Local Plan, Gladman encourage the Parish Council to include reference to Policy SS6 and Six Hills and that it makes clear a decision on a development proposal of this scale goes beyond the scale and nature of development to meet local needs, which is contemplated in the BODNP.

We also highlight that the plan might wish to make a review of the BODNP optional in circumstances where the site is allocated, positively identified in the SGP or if permission is granted. It may be that the Neighbourhood Planning Body would prefer to review the BODNP in the early 2020's, as is currently indicated, rather than requiring a review when decisions on the development of the site would have been largely established (particularly if permission has been established).

Neighbourhood Plan Policies

Gladman would like to help the Parish Council and MBC ensure a robust Neighbourhood Plan and the following section highlights several minor modifications to the policies of the plan to ensure greater compliance with the basic conditions that would help the longevity of the plan and to ensure that the plan delivers as the local community

intends. Gladman wish to make clear that these suggestions should not be viewed as criticisms and instead as ways to improve the plan overall.

Vision

Gladman suggest a minor modification to the vision to ensure compliance with the Framework. The vision sets out that the plan will 'maintain, protect and enhance our countryside, green spaces and wildlife.' To accord with the Framework Gladman suggests this wording is modified to state that the intrinsic character and beauty of the countryside will be recognised. This would ensure compliance with the Framework and compliance with basic condition (a).

Policy ENV 7: Areas of Separation

Policy ENV7 refers to the designation of two parcels of land as areas of separation. Gladman note that in the paragraph directly before Policy ENV7 a further "Provisional Area of Separation" (PAOS) has been identified to protect the land between the 'putative Six Hills Garden Village and Old Dalby village.'

Gladman understand the Neighbourhood Planning Body's desire to reference this in the Plan, however, it seems peculiar to identify a potential area of separation and not the site itself in this plan when the extent of the site is known and it has been the subject of community consultation. We suggest therefore that this plan would at least benefit from a red line on the plan and a label to identify the Six Hills site so that this is clear to the Examiner.

Alternatively, and since the foreword proposes not to consider the emerging site and that such an area would potentially come forward through a review of the Plan, it may preferable to take this reference out altogether. It is currently unclear how the evidence for this could be tested at the examination and indeed, whilst the south western edge of the PAOS abuts the Six Hills site boundary, it is usual for areas of separation to extend all the way to another settlement. At present its north western boundary is not defined by development at all, so it's not clear what the PAOS is actually seeking to separate the Six Hills site from.

Policy CF1: Protection of Community Facilities

Gladman note the concern of the Parish Council about the potential loss of facilities at Six Hills should the potential development come forward however we wish to reassure the Parish Council that as part of these proposals the Race Hub is to be retained in the proposal. Indeed, we are looking at options as to how this can be potentially expanded and improved.

Whilst the proposals would result in redevelopment of the Golf Course, we are in consultation with Sport England and England Golf and our recent Assessment of Golfing Facilities which we are preparing with their input establishes that the loss of the facility would not adversely affect golfing opportunities overall. Further, the scheme seeks to deliver significant new open space, sporting and recreational facilities through, *inter alia*, a new Six Hills park (to include the existing lakes and recreational opportunities there), new sports pitches and a pavilion, and shared used of indoor and outdoor facilities provided at the proposed schools.

Policy BE1: Business Development

This policy seeks for no further expansion to the business parks within the neighbourhood plan area until these current business areas are fully utilised. We would like to highlight that part of the Six Hills proposal includes a range of employment uses next to the Six Hills Business park. Gladman suggest that additional supporting text is added to this policy stating that should the Six Hills development proposal come forward this policy would not seek to restrict the expansion of Six Hills Business Park as part of a comprehensive mixed use Garden Village.

Monitoring and review

Gladman support the commitment to review the plan and refer you to our earlier comments on review triggers in relation to development at Six Hills.

Conclusion

Gladman recognises the Government's ongoing commitment to neighbourhood planning and the role that such plans have as a tool for local people to shape the development of their local community. We congratulate the Parish Council on a well-prepared neighbourhood plan and hope our suggestions are helpful to you. In the light of our extensive experience of Neighbourhood Plans, we would be happy to discuss the points made in further detail if you think would be of assistance.

We hope you will consider the points made in relation to Six Hills and we hope that with these changes it will help clarify the role of the Neighbourhood Plan in the decision making process.

In the event an Examination in Public of the BODP is required, we would wish to be involved and formally request to be invited.

Yours faithfully,

Laurie Lane
Planning Director
Gladman Developments Ltd.

Appendix - Six Hills Garden Village

Gladman would like to take this opportunity to provide the Parish Council with a short summary of the development proposal and an update on the progress, a location plan is below.

The site is free from any substantive environmental constraints and due its location and the interaction of existing vegetation and topography, is not overlooked by any significant residential communities. It is strategically well located on the existing transport network of the A46 and A6006, providing convenient access to Melton Mowbray, Loughborough, Leicester and Nottingham.

The scale of the site is such that Six Hills Garden Village can deliver a significant level of new housing, together with the provision of on-site uses for sustainable living such as schools, local shops, good access to new public bus routes, space for play and recreation and healthy active living.

Pre-application discussions have been held with various key stakeholders including Melton Borough Council, Charnwood Borough Council, Leicester City Council, Leicestershire County Council, Highways England, NHS England, Opun Design Review Panel and the Parish Council. Following advice from Melton Borough Council, two Public Exhibition Events were arranged. These were held from 3-7pm on Friday 16th June at the Six Hills Golf Course Club House and 10-4pm on Saturday 17th June at Melton Mowbray Library, Wilton Road, Melton Mowbray.

Current development proposals are for up to 3,000 well-designed new homes for modern living, including 'starter' and family homes, extra-care retirement living and affordable housing. Land will be provided for two new Primary Schools and a new Secondary School. The proposals will also deliver a mixed-use Neighbourhood Centre, an Innovation Campus, an Employment Zone, extensive Green Infrastructure including the Six Hills Park, sports provision, allotments and childrens' play areas.

An EIA scoping response was received from Melton Borough Council in February 2017 which is being used to inform the application proposals. Gladman are currently reviewing the feedback from the pre-application discussions and are finalising the reports for an outline planning application, aiming for submission by late September 2017.