

FOCUSED CHANGES RESPONSES TO REPRESENTATIONS RECEIVED: Focused Change 1

Representor Name	Focused Change / Policy Ref	Summary of Representation	MBC Response
CPRE Mr Hoyland	1	Ask why MBC is using the housing number in Towards a Housing Requirement study rather than HEDNA. Prefer the more rigorous and lower HEDNA number.	The HEDNA provides the objectively assessed need for new housing in Melton Borough. The TAHR then considers if any uplift is required in setting a housing requirement, taking account of what the plan is seeking to achieve, national policy and meeting some of the unmet housing needs from elsewhere in the Leicestershire and Leicester housing market area. TAHR provides the evidence to support a housing requirement higher than the HEDNA objectively assessed housing need.
CPRE Mr Hoyland	1.2	Fails to protect Service Centres, Rural Hubs & Rural settlements from excessive and non sustainable development. With regard to new developments in open countryside CPRE consider that the statement 'should be restricted' should read 'will be restricted' or preferably 'resisted'. The policy should be strengthened.	The focused change was to ensure that specific local needs for new housing could be met in the settlements where those needs arise. The criteria that need to be satisfied are considered sufficient to avoid the scenario the respondent fears.
Rosalind Cooper	FC1.2	The smallest settlements, such as Knipton, do not have capacity to do NDPs or surveys to establish community needs, so this may prevent necessary small scale development there. Delete the need for a community assessment to justify proposed development	The focused change was to ensure that specific local needs for new housing could be met in the settlements where those needs arise. Any needs assessment could be in proportion to the scale of development.
Susan Love	FC1	The proportionate approach to apportioning future development does not take account of particular development constraints of some villages, e.g. Bottesford, and some smaller settlements may benefit from more development. An alternative distribution should be considered and numbers reduced for Bottesford.	The approach to apportioning new housing in service centres was not the subject of a focused change.
Tom Parry, Barkestone Plungar & Redmile Parish Council	FC1.1	The HEDNA should not be ignored just to deliver a ring road in Melton.	The HEDNA provides the objectively assessed need for new housing in Melton Borough. The TAHR then considers if any uplift is required in setting a housing requirement, taking account of what the plan is seeking to achieve, national policy and meeting some of the unmet housing needs from elsewhere in the Leicestershire and Leicester housing market area. TAHR provides the evidence to support a housing requirement higher than the HEDNA objectively assessed housing need. The ring road is only one factor.
Tom Parry, Barkestone Plungar & Redmile Parish Council	FC1.2	The derivation of housing numbers for settlements in the preamble to SS2 is still wrong. The third paragraph should say "approximately 85% of the remaining Borough's housing need (1822)". The next paragraph then misleadingly suggests that all of the 322 remaining houses will be windfall in the Rural Settlements. Windfall sites should be mainly in Service Centres and Rural Hubs and only by exception in Rural Settlements. it should be made clear where windfalls will arise.	No focused changes were made to para. 4.2.14 or the subsequent para of the plan. 4.2.14 is the 3rd para referred to by the representor.
Tom Parry, Barkestone Plungar & Redmile Parish Council	FC1.2/SS3	The changes mean that Rural Settlements, inherently unsustainable, are being judged on the same criteria as larger settlement which are sustainable. Want the size thresholds reinstated in the policy, an a general policy that Rural Settlements, being unsustainable, are not to be developed, unless there are exceptional circumstances (e.g. use of redundant farm buildings).	The same criteria apply to all tiers of settlement, but the nature of the criteria, e.g. linked to needs and respecting settlement character will ensure that the development that would be permitted in each category is appropriate.

John Rust		Long Clawson – planning for between 5,750 and 7,000 dwellings not justified, and will have adverse affect on the villages.	The HEDNA provides the objectively assessed need for new housing in Melton Borough. The TAHR then considers if any uplift is required in setting a housing requirement, taking account of what the plan is seeking to achieve, national policy and meeting some of the unmet housing needs form elsewhere in the Leicestershire and Leicester housing market area. TAHR provides the evidence to support a housing requirement higher than the HEDNA objectively assessed housing need.
John Rust		Assessments not unpinned by local knowledge.	The housing site assessment was carried out on a consistent basis for the whole of the Borough, using trusted sources of information. This approach is considered proportionate and fit for purpose. The use of unverified lcoal information could have introduced bias.
John Rust		Division of development by population makes the sustainability assessments meaningless. Six Hills + NDP levels of development within villages provides an alternative.	The distribution of development across service centres, and the overall spatial strategy were not the subject of a focused change.
John Rust		Whilst proportionate investment in infrastructure is planned for Melton to help it accommodate new development, the same is not true of the villages, and traffic impact has not been considered.	Decisions about infrastructure investment are based on impacts rather than being related directly to the number of houses planned. The MMDR will also benefit the whole of the Borough easing movement to and from the main centre. A response to traffic impact on rural roads was given in response to comments at Pre Submission draft stage.
Brian Hodder	1	Lack of co-ordinated infrastructure and strategic approach, especially for traffic flow and air pollution,e.g. around Melton Spinney Road where 3 new sites will access onto the road. Persuading occupants of new homes not to use cars won't work.	The local plan is where development and infrastructure is co-ordinated. The provision of the MMDR is being co-ordinated with new housing deveopment, schools, shops and employment areas. Policy IN1 and IN2 encourage the provision of infrastructure to encourage travel by sustainable means, but does not assume no useage of cars by new residents.
Melton North Action Group	FC1/SS2	Do not support insertion of 'approximately in 65:35% split of Policy SS2, referring to the 60:40 apportionment of development that the Core Strategy Inspector indicated would be more acceptable. Accepts that it will be difficult to monitor the exact percentages. Seek a change to indicate that no more than 65% should be permitted. Any more will increase the risk that delivery of the Local Plan could be jeopardised if the two Sustainable Neighbourhoods cannot be delivered or delivery is delayed.	The change proposed was to clarify the meaining of 65% and 35%, so that it was clear it did not mean 'up to' or 'at least'. This part of the focused changes was not a policy change, just a clarification.
Peter Wilkinson	FC1	The proposed changes to the policy in respect of service centres and rural hubs are supported and will allow a degree of flexibility to help deliver sustainable development in suitable locations. Paragraph 4.2.16 gives sufficient guidance on the scale of development envisaged without being overly prescriptive.	Noted.
Christopher Noakes	FC1	Support and agree with the changes to Policies SS2 and SS3, which provide greater clarity, omit repetition of wording and earlier confusion. Also support the integration of former tables 4-7 into one combined table.	Noted.

Lilian Coulson, obo Mr & Mrs N J Spick	FC1	Bottesford/Easthorpe. Support SS3 and SS2 for the support it gives to small builders. Suggests that land adjacent to 8 Easthorpe Road, Bottesford should be included in plan – and that EA updated flood risk modelling to be carried out in Autumn/Winter 2017/18 should be brought to attention of LP Inspector, as existing is historic and out of date. We support the continued commitment that planning permission will be granted on sustainable and suitably located and designed sites for small housing developments, as set out in the policies and supporting paragraphs. The recent Government White Paper and research have emphasised the need to support small and medium size builders (rather than rely overwhelmingly on the few national housebuilders which dominate the market) and these additional small sites will assist both in providing much needed housing to meet local needs and help sustain the local economy. Providing this flexibility beyond the specific housing allocations will allow identified shortfalls (such as in Bottesford) to be met and provide choice in the market on suitable sites as they become available and come forward. This is likely to be supported by the anticipated changes to the NPPF as set out in the recent Housing White Paper consultation and therefore is likely to be a material consideration for such applications.	Noted; The site has been assessed using the information currently available and is subject of flood risk. It is appreciated this is dynamic but it is not agreed the Plan should be postponed to await the arrival of new evidence. The housing site assessments underpinning Focused Change 4 were based on the most up to date information and data that was available on a comparable basis across the whole of the Borough at the time, for a relevant range of sustainability, suitability and achievability factors. The Council consider this to be adequate and proportionate evidence, as per NPPF para. 158.
Paul Girdham	General	Long Clawson. Not taken any consideration to the wishes of the people who live there.	All representations received are given the same consideration, but the result of that consideration is not always to agree with what the representor is saying.
Sam Silcocks obo Tata Steel	FC1	Support the ‘policy on’ approach to determining the housing requirement, which is supported by NPPG, and is underpinned by a strong and convincing case. A 274-280 dwelling per annum (“dpa”) figure should be applied owing to the clear social and economic benefits, combined with the lack of any additional negative environmental implications in the Sustainability Appraisal Addendum when compared to the previous housing target of 245 dpa. Also NPPF 47 is clear that the full, objectively assessed needs for market and affordable housing should be met, as far as is consistent with the policies set out in the Framework. The affordable homes need should be aligned with the upper limit of the employment based range. Explicitly Do not comment on whether the reduced OAHN figure this represents an accurate and robust position based on the latest evidence base.	It would be unrealistically ambitious to expect the market to sustain delivery at 274-280 dpa. The Council considers its evidence for 245dpa robust and proportionate.
Catherine Jennings	FC1 SS2/3	Amend SS3 so it is limited to brownfield sites, as per NPPF.	The definition of windfall sites in NPPF only says that they normally comprise previously-developed sites. It does not exclude greenfield sites.
Catherine Jennings	FC1 SS2/3	too wide a range of settlements are included in ‘service centres’ category	The focused changes did not change the settlement hierarchy or the settlements included within each level.
Catherine Jennings	FC1 SS2/3	The latest changes to Policies SS2 and SS3 clarify that the policy approach applies to unallocated sites adjoining all rural settlements. However, allowing windfalls on greenfield sites is too open, but notes that there is an element of control in supporting text - that support should be in the policy. Not clear if windfalls can come forward in locations where there are housing allocations	Noted. The Policy was changed to provide a better balance between allowing development that was needed locally and controlling unsustainable development through the criteria in the policy. The greenfield/brownfield point is answered above. Brownfield windfalls in Melton Mowbray would be permitted through application of Policies SS1 and SS2, and NPPF.

Mike and Elaine Maffei	General	Questionnaire is structured but too complicated, and may put off people from making comments, despite its importance. May not have filled it in right.	The criteria for the consultation are prescribed by Regulations. As development will be funding sections of the Distributor Road, it would not be viable to require the section referenced to be completed prior to all development. Policy SS4, part t1B requires appropriate mitigations through the development period.
Dr J. Warwick	FC1	Overall Housing needs –take care in negotiations about how much numbers to take from elsewhere, and consider factoring possible reduction in housing demand over next 20 years arising from Brexit.	Data/forecasts on the effect of Brexit not yet available. Consideration has to be given to new national ONS evidence as and when it is published.
RHB Ranns for Croxton Kerrial and Branston Parish Council	FC1	<ul style="list-style-type: none"> • TAHR does not provide proper evidence as to why HEDNA should be overturned, and some of the arguments would be applicable anywhere, e.g. ageing population. • Consistency within HEDNA, and unexplained inconsistencies between HEDNA and TAHR. • 44% uplift strategy of TAHR has not been tested/justified. • Whether or not Melton is the best place to met unmet needs from the south of the county is not addressed. • Further work is needed to quantify the effects of issues discussed, and the variances with HEDNA. • Reiterates previous comments about population figures – still want these corrected. <p>4.2.2 and 4.2.21 – TAHR not positively prepared because it departs from the OAN and gives no objective assessment of the likely quantitative effect of policy decisions. Not proper justification of why OAN is being overturned, e.g. employment land study Fig 10 shows how little inward investment to Melton there has been. How is it concluded that the same amount of employment land will deliver more growth and some upper and lower boundaries of growth envisaged should be identified.</p>	The Council considers the evidence in HEDNA and TAHR to be robust and proportionate. In accordance with national planning practice guidance, the Council has considered (in TAHR) whether there are policy reasons to uplift the housing requirement from the OAN in HEDNA. The Council report of 4th July tests the 245dpa against several other scenarios to establish which one gives the best plan outcomes and is deliverable. The Strategic Growth Plan will provide the exact apportionment of unmet needs from outside Melton. The headroom provided in the plan will contribute to meeting some or all of that apportionment. If its not enough, then the review trigger of Policy SS6 is engaged.
RHB Ranns for Croxton Kerrial and Branston Parish Council		Criteria (1) to (5) of Policy IN2 cannot generally be achieved in the villages. It is in conflict with the spatial strategy that requires 35% of new housing development to be in villages.	The policies of the plan are to be read as a whole. Policy SS2 sets out the overall spatial strategy. Policy IN2 is to identify the transport considerations for that development that is appropriate according to other policies in the plan.
Geoff Platts, Environment Agency	FC1	Support changes.	Noted.
Carl Powell	FC1	<ul style="list-style-type: none"> • Supports 170dpa from HEDNA. HEDNA already specifically takes into account considerations of affordability, economic growth/stimulus, and inward migration/commuting. • Development in village not economically sustainable – refers to ‘planning the future of somerby parish’ for information on employment opportunities and infrastructure. • Jobs – questions the link between households and jobs. Approach risks lower wage and higher unemployment. Policy on and policy off distinction is contrived. 	The Council considers the evidence in HEDNA and TAHR to be robust and proportionate. In accordance with national planning practice guidance, the Council has considered (in TAHR) whether there are policy reasons to uplift the housing requirement from the OAN in HEDNA. The Plan is informed by detailed technical evidence and MBC's engagement with local businesses , with a number of local businesses looking to expand and a lack of land available locally to facilitate this. The overall plan strategy including housing growth and transport investment will support the Borough's economic proposition and growth potential. The Council considers the evidence underpinning its spatial hierarchy to be robust and proportionate.
Carl Powell	FC7	Supports policy.	Noted.
Colin Love (Professor)	General	Support the MLP objectives but feels direction it has been taken in has been shaped by misguided national government.	Noted.

Colin Love (Professor)	FC1	Jobs – seems to be no more than wishful thinking –unjustified and unsubstantiated. Does not question if economic growth is a good thing.	The local plan has to be in general conformity with the NPPF. National Planning policy is to promote and support sustainable economic growth.
Colin Love (Professor)	FC1/SS2	MBC has rejected HEDNA. Higher numbers being driven by the objective to obtain sufficient developer contributions to build a town bypass. The inflated overall number has adverse consequences for villages arising from an inflated 35% needing to be accommodated. New housing in the least sustainable locations i.e. rural area, should be limited to local need. E.g. bottlesford - proportionate approach is well beyond local need. Flexibility of 'approximately' should only be applied to Melton as that is where plan objectives of employment and transport will be achieved . HEDNA provides no evidence of substantial economic growth. Proportionate approach does not take account of the facts that Bottesford floods. Size of settlement is not an indicator of capacity to absorb further growth. Regard needs to be paid to Midlands Rural Housing needs report for Bottesford.	The HEDNA provides the objectively assessed need for new housing in Melton Borough. The TAHR then considers if any uplift is required in setting a housing requirement, taking account of what the plan is seeking to achieve, national policy and meeting some of the unmet housing needs from elsewhere in the Leicestershire and Leicester housing market area. TAHR provides the evidence to support a housing requirement higher than the HEDNA objectively assessed housing need. The focused changes do not include changes to the rural:urban split nor to the settlements included in each level of the hierarchy - the introduction of 'approximately' was to clarify that this was how the policy would operate in practice. The spatial hierarchy ensures that less housing will take place in the least sustainable places. The site assessment process excludes from consideration sites or parts of sites that are most likely to flood. The Council needs to meet rural housing needs, the housing needs of the Borough as a whole and plan for the provision of enough new housing to meet the plan objectives and meet a proportion of the unmet needs arising from elsewhere in the wider housing market area.
Aspbury Planning, obo Barratt David Wilson Homes	FC1.1	The HEDNA has been criticised by the HBF and a number of developers for underestimating OAN in a number of areas and so it is laudable that Melton BC have opted to disregard its substantial under-estimate of housing-need. However, overall provision of (at least) 6125 dwellings, is still at the lower end of the range identified in TAHR - this is not consistent with National Policy objectives to boost significantly the supply of housing.	The HEDNA provides the objectively assessed need for new housing in Melton Borough. The TAHR then considers if any uplift is required in setting a housing requirement, taking account of what the plan is seeking to achieve, national policy and meeting some of the unmet housing needs from elsewhere in the Leicestershire and Leicester housing market area. TAHR provides the evidence to support a housing requirement higher than the HEDNA objectively assessed housing need. The housing requirement in the plan has to be a deliverable number. The Councils evidence indicated that 245dpa is ambitious but that 280dpa would be unrealistic.

Aspbury Planning, OBO Barratt David Wilson Homes	FC1.2	Support change to Policy SS2, though Barratt David Wilson propose a 60/40 split and further weighting to recognise the size, role and facilities of Bottesford. Partly support changes to Policy SS3. However, OBJECT to the change to the wording of SS3 in respect of deleting 'or' as the final word in criteria 1, as it makes the policy too restrictive by requiring any/ every unallocated site to conform to a community led strategy or housing or economic needs assessment. The Borough is likely to continue to struggle to deliver housing numbers even adopting the Liverpool approach to calculating 5 year housing requirement. MBC should be more pro-active towards other unallocated sites coming forward to meet the minimum provision for the District during the plan period.FC 1.3: OBJECT to the propose Focussed Change to paragraph 4.2.21 of the Local Plan, specifically the statement that Bottesford does not meet its own residual housing requirement , and that the shortfall will be addressed by the surplus capacity in other Service Centres and Rural Hubs. It is astonishing that MBC should seek to limit the capacity of their 2nd and 3rd largest settlements (Bottesford and Asfordby) both in terms of their population and range of local services and facilities, and then redistribute the alleged shortfall to other settlements a quarter of the size (at best) and with substantially fewer facilities and services. BDW are promoting land east of their current Belvoir Road site in Bottesford for 180 dwellings. MBC should maximise the opportunities within its most sustainable settlements and Bottesford is by far the most sustainable of the Service Centres, and the second largest settlement in the Borough. Sites such as Belvoir Road should be coming forward to meet the housing requirement. There is no credible argument to support Bottesford delivering less than its proportionate share of the minimum housing requirement.	Support noted. The focused change was to ensure that specific local needs for new housing could be met in the settlements where those needs arise. Any needs assessment could be in proportion to the scale of development.
Anthony Maher	FC1/SS2	During the core strategy review The Inspector suggested a split of 60:40 between Town and Borough (as the population split was 50:50). So the wording for this should be for the town to have NO MORE than 65% of the housing.	The change proposed was to clarify the meaning of 65% and 35%, so that it was clear it did not mean 'up to' or 'at least'. This part of the focused changes was not a policy change, just a clarification. The lcoal plan is a new plan with its own oblectives and spatial strategy flowing from that.
Terence Joyce	FC1	Table 4: Residential housing requirements – residual is too high for Somerby, given size and infrastructure. Respond to local concerns and take Somerby out of Service Centre category. Traffic levels on high street and poor unreliable public transport are given as examples of limited infrastructure. Jobs – growth of housing is not linked to any evidence of unfilled jobs. The area is not industrial. Only build in areas where new workers are needed.	The settlements within each category of the settlement hierarchy were not the subject of a focused change. The robust and proportionate evidence and justification underpinning the draft local plan still applies. The Council's approach to development in the rural area reflects the more limited employment oportunties there, but it is also an objective of the plan to promote sustainable communities, and this is often partly achievable through new housing development.
Moirra Hart	FC1, 2, 3, SS3	Long Clawson - The plan doesn't do what the first para of Policy SS3 says, taking no account of evidence provided by the village and reality, taking a one scenario fits all approach to villages.	All the policies of the plan should be read as a whole. Policy SS2 sets out the spatial strategy that identifies Long Clawson as a sustainable location for some housing development. That is not changed by the focused changes. The Council has used a consistent and proportionate evidence base to assess potential housing sites across the whole Borough, for suitability, sustainability, achievability and availability. The use of unverified information and information only available in one area could introduce bias.

<p>Clawson, Hose and Harby Parish Council</p>	<p>FC1/SS2/C1(a)/C1 (b)</p>	<p>Part of SS2 is contradictory with SS2 and SS3 allocating sites despite Neighbourhood Plans being progressed in many areas. Community feedback and evidence on the NP has been afforded no weight in preparing the MLP, with MBC relying on their own evidence. Many Neighbourhood Plans were well advanced at the start of this Focused Changes consultation with some completing Regulation 16 consultation and several more having completed Regulation 14 consultation and entering Regulation 16 consultation at a similar time to this Local Plan consultation. MBC are aware of the NP proposals and evidence. The Plan removes the remit of NPs to allocate sites in their area, and all reasonable alternatives haven't been considered. Seek a change that includes a clause in C1(a) and (b) to say that NPs at or beyond Reg 16 should be the source of allocations, provided the minimum target plus reserve contingency is met</p>	<p>The Councils site assessment process and distribution of housing requirement are based on its own proportionate and robust evidence. There are instances where local communities have provided more detailed information on aspects of the site assessment, but as this comparable level of information is not available for the whole of the Borough and has not been validated, it could introduce bias to use it for the area where it is available. The Council's requirement in respect of consideration of reasonable alternatives is in relation to the strategy. The longer length of time it takes to prepare a local plan compared to a neighbourhood plan means that some NPs will start later and finish earlier. The Council will consider suggesting modifications to the Local Plan Inspector during the examination for any NPs that have reached receipt of Examiners Report stage or later. National guidance indicates that relatively little weight can be afforded to a NP at Reg 16</p>
<p>Clawson, Hose and Harby Parish Council</p>	<p>FC1.1/SS2/SS3</p>	<p>There is inadequate objective and convincing evidence for preferring the TAHR annual and aggregate new housing figures, as it will have perverse and harmful effects on the more remote settlements of Long Clawson, Hose and Harby, and the oversupply of housing would be unsustainable. Table 88 of the HEDNA report identifies a Borough-wide Demographic Need of just 134 new homes pa, and has already included additional elements including 20 pa as an "Affordability Adjustment" and 16 pa "to support Economic Growth" to reach the 170pa figure. The NP is at Regulation 16 stage, and the Parish Council wants to work positively with the Borough to meet a justified and reasonable share of housing need, that environmental, traffic and infrastructural constraints in all three villages and which means an over-inflated Housing Requirement is harmful and difficult to accommodate without significant further infrastructure investment. Policies in the MLP should be based on and reflect the requirement in the HEDNA of 170 new dwellings pa (4,250 in total). If this is insufficient to deliver the road and enough affordable housing in Melton, the geographical apportionment should be amended to boost the numbers of new homes in the town. This is a more sustainable solution to FC1.1</p>	<p>HEDNA sets out the objectively assessment need. This can be different to the Borough's housing requirement, when policy considerations and plan objectives are taken into account, which government guidance indicates LPAs should do. That is true in this case, as set out in TAHR. The spatial strategy is where the housing requirement is apportioned, but this element of Policy SS2 has not been changed by the focused changes, except to clarify the nature of the urban:rural 65:35 split. The reasonable alternatives to the spatial strategy were considered at an earlier stage of plan preparation. Reliance on the HEDNA figures proposed would significantly undermine the aims and objectives to the Plan, in respect of which there appears broad consensus. It is also unclear what that aspects of HEDNA has been favoured, as opposed to other parts such as the figure at Table 40 (affordable housing bearing in mind the Plan's objectives and the content of NPPF para 47 "[LPA's should]use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing. The use of 170 p.a would remove the opportunity to address the infrastructure issues in Melton Mowbray which in turn would mean no, or a very small quantity, of development could be accommodated in or around the town due to the evidence establishing that a sever highways situation exists and that a strategic intervention is required to address it. It would therefore need to be distributed elsewhere in the Borough's more sustainable settlements.</p>
<p>Savills on behalf of Worthearly Ltd</p>	<p>FC1.2 / SS2</p>	<p>SUPPORT: support the delivery of most growth in the main urban area. Agree that the role and sustainability of Melton Mowbray will be significantly enhanced by more housing and employment, including the re-use of brownfield sites, and by providing necessary infrastructure. From the evidence base presented we consider Policy SS2 and FC1.2 to be sound and in compliance with legal requirements. FC4.1 - support & suggest site can come forward for housing earlier than plan anticipates.</p>	<p>Support and timing of availability suggested noted.</p>
<p>Adam Murray</p>	<p>FC1</p>	<p>Support removal of definitive limits to quantum of development on unallocated sites and recognition that targets in SS2 area minimum.</p>	<p>Support noted.</p>

<p>Julie Moss (Bottesford Forum)</p>	<p>FC1</p>	<p>Development projection What is the correct understanding of projection (3 alternatives presented) 1. Can Melton Borough Council explain which of the above two projections are valid or is there an alternative explanation for the development rate through to 2036 being front-loaded? 2. Do Melton Borough Council believe there will be such a low development profile in the latter part of their 25-year plan? 3. How will Melton Borough Council control or reject any large (non-windfall) developments in the latter part of their 25-year plan? 4. Although the development figures for Bottesford include the windfall applications completed from 2011-2017, why has Melton Borough Council not included any windfall development projections from 2018-2036?</p> <p>Traffic and road safety Concerns about increased traffic flow; off and on street parking; High Street and Barkestone Lane leading to the schools is already in a dangerous state with cars and school buses causing gridlock at peak travelling times. 5. What will Melton Borough Council do to alleviate traffic congestion and address road safety concerns in the village? 6. In Spring 2016 Melton Borough Council agreed to investigate if development sites had highway road safety problems. Has this been undertaken, what were the results and how has it affected the Melton Local Plan?</p>	<p>Version 3 is correct (orange: peaking between 219 -2017 before receding lo to low levels, as set out in the Five Year Land Supply and Housing Trajectory Position (30th May 2017). The Plan makes provision for the entire plan period up to 20136 and iof sites are used in earlier parts there are no plans at present to add more. The Plan will of course be subject to review (see policy SS6). The Plan will form the DPD for the area and will obtain legal ‘primacy’ under s 38(6) of the P &CP Act 2004 for the determination of applications. Applications contrary to the Plan will be subject to its content and material considerations prevailing at the relevant time. Windfall is accommodated in the housing supply calculations by means of deducting them (522 (9%)) prior to allocating specific sites. Windfall is included within the development projections within the Five Year Land Supply and Housing Trajectory Position (30th May 2017)</p> <p>The Highway Authority has been consulted at every stage of the Plan and has not identified capacity or safety issues. Thy have advised that incremental highways improvements may be necessary and that these can be secured through the normal planning application process by means of transport assessments, conditions, s106/278 obligations etc. the Focussed Changes reduce the quantity of development proposed in Bottesford and as such reduces the impact on these issues. The Highways Agency have similarly been consulted in view of proximity to the A52 and have also not identified barriers.</p>
<p>Julie Moss (Bottesford Forum) (cont)</p>	<p>FC1</p>	<p>Local services Concerns about the ability of local service providers to expand to continue to service a greater population. A minimum of 1500 additional residents in the villages of the parish increases the overall population by 42% making Bottesford a small town with circa 5100 residents. Question 7. How does Melton Borough Council plan to ensure that local services meet the development growth and associated population increase?</p>	<p>Health, Education, Police , LRFS and other service providers have been consulted at each stage of the Plan,. None have advised that their capacity is not,, or cannot be expanded, to serve the proposed level of growth. ‘Focussed Changes’ proposes a reduced level of growth in Bottesford that previous iterations, which can only assist with these issues. Provision for provision for expansion of capacity would be secured through normal provisions , e.g. s106 and their own powers e.g powers under the water and sewerage acts, tax precepts etc). Other services, i.e. commercial services, will be supported by growth and would be dependant on market conditions.</p>

<p>Julie Moss (Bottesford Forum) (cont)</p>	<p>FC1</p>	<p>Public transport Public transport is poor. The ever-decreasing bus service is unlikely to improve with the route to Melton being so tortuous and takes so long that it is not preferred over car travel. Other routes to Bingham, Grantham, Nottingham and Newark, being the preferred locations for employment, retail and leisure activities, are virtually non-existent placing a greater reliance on the car and therefore the associated impact covered above. The bus service to Grantham is reasonable but is limited in the evening and Saturdays and does not run on Sundays, again placing a greater reliance on the car. The train service is inadequate being two-hourly for much of the day and non-existent in the late evening and there are currently no definitive plans to allow more trains to stop at Bottesford. The current frequency and convenience of the bus and train services are unlikely to persuade residents of any new development to use public transport rather than their cars. Question 17. What consultation has Melton Borough Council done to ensure neighbouring authorities will co-operate to improve public transport for Bottesford and neighbouring villages in order to maintain its' sustainability as a Service Centre?</p>	<p>Public Transport providers have been consulted at each stage of the Plan. Population growth creates an incentive for improving/maintaining provision.</p>
<p>Julie Moss (Bottesford Forum) (cont)</p>	<p>FC1</p>	<p>Environment Concerns relating to the impact of pollution resulting from the large increase in the number of vehicle movements around the centre of Bottesford, especially around the High Street, Grantham Road and Barkestone Lane areas. It is likely that this will increase to double this volume by 2025 if the planned development numbers go ahead. There is very little Grade 2 agricultural land in the Melton Borough, however a significant amount of this exists in and around Bottesford Parish. Questions 20. Can Melton Borough Council evidence how they have investigated the impact of pollution in the critical areas of Bottesford and how they intend to address this health risk? 21. Can Melton Borough Council explain why they have chosen land for preferred development that is prime (Grade 2) agricultural land?</p>	<p>The Focussed Changes do not propose to double the population nor would there be a commensurate increase in traffic. There is no known clean air issues in Bottesford nor has evidence been produced to demonstrate it will arise as a result of the level of growth proposed. 'Focussed Changes' proposes a reduced level of growth in Bottesford that previous iterations, which can only assist with these issues. Agricultural land quality has been one of the factors taken into account in the individual assessments of sites alongside a range of others. Where higher grade land has been identified it is recognised and incorporated into the 'suitability factors' to produce the final 'scores' and comparison of sites that informed selection. The housing site assessments underpinning Focused Change 4 are based upon a relevant range of sustainability, suitability and achievability factors. The Council consider this to be adequate and proportionate evidence, as per NPPF para. 158.</p>

<p>Julie Moss (Bottesford Forum) (cont)</p>	<p>FC1</p>	<p>Location and sustainability Question whether Bottesford is appropriately identified as a Rural Service Centre for the Borough. Villages closer to Melton are more sustainable due to proximity of work opportunities, retail, health services, transport links, emergency service access, significantly reduced flood risk and access to secondary education. The HEDNA produced in January 2017 identified a household growth in Melton Borough of 14.4% between 2011 and 2036, being 3106 houses (equivalent of 6707 population growth). Bottesford is planned to increase by 504 houses during the period 2011-2036.</p> <p>24. Why has Bottesford been identified as the most appropriate location for the most significant element of the rural allocation when the indications are that the proposed Melton Local Plan does not offer a sustainable environment in which to place such significant development volume?</p> <p>25. Can Melton Borough Council provide evidence that investigations have been carried out into the needs and impact relating to traffic, schools, health facilities, shopping, leisure, infrastructure and employment associated with the estimated population growth, together with the associated actions to mitigate the impact on the residents of Bottesford village?</p> <p>26. If the HEDNA report of 2017 highlighted an expected growth of 3106 houses in Melton Borough, why is Melton Borough Council still projecting a 6125 housing growth in the Melton Local Plan?</p> <p>27. If the HEDNA report of 2017 highlighted an expected growth of 14.4% in houses for Melton Borough, why is Melton Borough Council projecting over 30% housing growth for Bottesford?</p>	<p>The allocation to Bottesford proposed by 'Focussed Changes' is 324 (net). It is proposed to receive the largest allocation of the villages owing to its existing size and range of facilities, which are second only to Melton Mowbray in the 'settlement hierarchy'.</p> <p>The HEDNA sets out an OAN figure derived from a consistent assessment across the Housing Market Area. There are however a wider range of local considerations which are relevant in setting the housing target and have been considered in the TAHR Report and Addendum. These include aligning to the Plan's strategic objectives, including in delivering affordable housing for local people; the delivery of the Melton Mowbray Transport Strategy; alignment of the Plan's housing and economic strategies; supporting local service provision; and providing flexibility to meet unmet needs from other parts of the HMA. These are relevant factors in bringing the evidence base together to determine the plan target. The 245 dpa housing requirement is influenced by policy considerations which relate to the plan's objectives as above, It is also planned for to provide flexibility to meet the NPPF obligation unmet housing needs, which is relevant in view of the declarations from Leicester CC and OWBC regarding unmet need. This is set out in the evidence and consideration of all factors (not simply one part of one document) http://docs.melton.gov.uk:8080/WAM/doc/Report-844307.pdf?extension=.pdf&id=844307&location=volume1&appid=2030&contentType=application/pdf&pageCount=1</p>
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<p>Sarah Allsopp (obo DLP Consultants)</p>	<p>SS2</p>	<p>280 dpa is necessary to meet the economic and social aspirations of the plan; the fact that it is different to that previously consulted upon should not be used to justify a lower housing requirement. Evidence to justify why a housing requirement of 245 dpa has been chosen over 280 dpa is needed. A detailed rehearsal of the content of TAHR is provided. A detailed rehearsal of the findings of SA addendum 2017 provided, the SA itself which concluded that Option 3 (280 dpa) performs more positively than Option 2. Plan considered unsound as:</p> <ul style="list-style-type: none"> • It does not meet objectively assessed development requirements, most notably affordable housing needs; • The strategy is not in accordance with the findings of the SA - option 3, to deliver 280 dpa was found to perform more positively than Options 1 or 2 but has been not been taken forward by the Council, and no reasons provided; and • The plan is not consistent with NPPF which seeks to boost significantly the supply of housing and ensure that Plans meets the full, objectively assessed need for affordable housing (paragraph 47). <p>The Council should identify a housing requirement of 280 dpa, to meet objectively assessed development and infrastructure requirements (most notably affordable housing) and boost significantly the supply of housing in the Borough. It will provide a step-change in the delivery of housing required by NPPF. This would be the most appropriate strategy having regard to the alternatives assessed in the Council’s own evidence base. Consequently Policy SS2 should be revised to state: ‘Provision will be made for the development of at least 7,000 homes and some 51 hectares of employment land between 2011 and 2036 in Melton Borough.....’</p>	<p>This representation is framed in similar terms to the discussion in the evidence document ‘DRAFT MELTON LOCAL PLAN: HOUSING REQUIREMENTS’ in which a range of housing requirements from the evidence is considered. 245 was considered to be the preferred option on the basis of the balance of positive and negative effects it presented. The higher level of 280 dpa, whilst it would deliver more affordable housing, is not deliverable in that it would be unrealistically ambitious to expect the market to sustain this rate of delivery. The TAHR Report (Section 7) outlined that 245 dpa had been achieved 3 times over the last 22 years. It outlined that this would represent a growth rate in housing stock of 1.0% pa which is comparable with what has been achieved historically in similar areas and above the 0.8 – 9.9% pa which the Housing White Paper envisages nationally.</p> <p>As the Council’s Housing Trajectory shows, the residual requirement over the rest of the plan period requires an average of 317 dpa (2016 forwards, implying a growth rate of 1.2% pa). Given the market characteristics, as evidenced in the HEDNA, this is clearly ambitious. This reinforces the conclusion in the TAHR Addendum (Para 6.23) that it would be unrealistically ambitious to sustain delivery above 245 dpa.</p> <p>Whilst 245 dpa this will not meet the affordable need in full, consideration has been given through the TAHR Addendum and SA to higher housing provision. Notwithstanding that the SA found a positive impact from higher affordable delivery in Option 3 (280 dpa) the TAHR Addendum found that this was not deliverable. It is clear that higher overall housing provision has been considered. The Kings Lynn & West Norfolk v Elm Park Holdings confirms that it is reasonable to reject the higher option as undeliverable from a market perspective.</p>
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Justin Cove (obo Richborough Estates)	FC1.2 (SS2 & SS3)	<p>Focused Change FC1.2: Policy SS2 Development Strategy and Policy SS3 Sustainable Communities</p> <p>Object because of concerns outlined regarding Neighbourhood Plans. These comprise High Court decisions in which convey that:</p> <ul style="list-style-type: none"> • An NP can come into force at any time and that can include in advance of an LP • any conflicts that may arise between policies in the emerging neighbourhood plan and Local Plan must be resolved by the decision maker favouring the policy which is contained in the last document to become part of the development plan. <p>And:</p> <ul style="list-style-type: none"> • the question of whether two plans are in general conformity is a matter of planning judgement and the guidance does allow for a degree of flexibility so was not considered to be a sound reason to challenge the decision. • where policies in a local plan could be considered to be redundant (for example the Local Plan period has expired) they could be disregarded for the purposes of considering the requirement of general conformity. <p>The Frisby NP is more advanced than the Melton LP and allocates only one of the sites identified in the LP (Great Lane, plus an extension to it). The Local Plan must adequately take into account the findings of the emerging Neighbourhood Plan. There is no reference in SS2 or SS3 to situations where a Neighbourhood Plan is already in place.</p>	<p>The NP concerned has not yet come into force and results of Examination are awaited, with some of its content not consented and questions regarding meeting the Basic Conditions, upon which the Examiner will adjudicate.</p> <p>SS2 advises that support will be given to NP's where they are in conformity with the Plan, so clearly the differences in content do not benefit from this support.</p>
Christopher Jesson (obo JGP Properties Ltd)	FC1.2	<p>Supports removal of site size thresholds. However, the requirement to meet all the criteria is unsound. Seeks replacement of 'and' between each criteria with 'or'.</p> <p>Suggests that the Council has not considered earlier representations made about growth in rural settlements, and refers to criteria for candidacy for rural hubs to support an argument for inclusion of Burton Lazars as a Rural Hub, and set out the reasons why two sites there are suitable for development.</p>	<p>As Policy SS3 is about exceptions to allocated sites, the requirement to meet all criteria is considered reasonable.</p> <p>The changes to Policy SS3 are a response to comments about rural settlements.</p> <p>The focused changes did not change the hierarchy of settlements, so no comments on this or the suitability of the sites suggested are made here.</p>
Michelle Galloway (obo Davidsons), Pegasus (Guy Longley),	FC1.1	Support	Noted.
Adam Murray (obo Leicester Diocesan Board of Finance)	FC1	Support	Noted.
Adam Murray	FC1	Support	Noted.
Catherine Jennings	FC1 SS3, SS2	<p>Is it consistent with national policy to allow greenfield sites to come forward as windfalls? Policy is still too open ended and unco-ordinated. Suggest more greenfield sites should be allocated instead of relying on windfalls. Seeks removal of the 'or on the edge of existing settlements' clause, and is concerned that as written, the policy could prevent brownfield windfalls in Melton Mowbray coming forward.</p>	<p>The focused changes did not change this aspect of Policy SS2 and SS3. It is not inconsistent with NPPF, as NPPF does not say they are exclusively previously developed land. NPPF para 48 indicates that an allowance can be made for windfalls.</p> <p>Brownfield windfalls within Melton Mowbray would be permitted by application of NPPF and Policy SS2.</p>
Phill Bamford (Gladman)	FC1.2	<p>The need to create an unambiguous policy to tackle acknowledged housing shortfalls in the Housing Market Area (HMA) through the allocation of a New Garden Village at Six Hills has not been addressed in the Focused Changes.</p>	No focused changes were proposed in response to this representation.

Phill Bamford (Gladman)	FC1	Support introduction of flexibility into urban: rural split.	Noted.
Phill Bamford (Gladman)	FC1, FC2	SA evidence shows that 280dpa is the most sustainable housing option, arising from additional affordable housing delivery. The reduction of affordable housing to 15% in FC2 suggests that a key driver for uplifting the housing requirement above the OAN will only be met at 280dpa.	245 is the highest housing number of the SA options considered that is realistically deliverable. If an unrealistic housing requirement was set, it may not result in any more housing of any type.
Phill Bamford (Gladman)	FC1.1	Insufficient flexibility to assist in meeting the unmet housing need identified within the HMA.	The Local Plan has sufficient flexibility to meet needs higher than the OAN. As the quantity of unmet need elsewhere is not yet known, it would be premature to identify a very significant uplift from OAN to accommodate this, as it may not ultimately be needed. Policy SS6 has a review mechanism if the flexibility is insufficient.
Phill Bamford (Gladman)	FC1	Suggest 280dpa is a policy off housing number, and a true reflection of the OAN. There is no evidence to support the 245dpa. The plan should explain that the OAN referred to is for Melton, and excludes any unmet needs from elsewhere, which would require a further uplift from 280dpa. References an appeal decision letter APP/G2435/W/15/3005052, that supports accounting for local economic factors beyond OAN, and provides reasoned arguments to refute Charnwood BCs Pre Submission Draft concerns.	HEDNA 170 dpa is the policy off number. The TAHR document investigated if there was a policy on case for a higher housing number. The HEDNA explains that housing provision above 154dpa will support additional in-migration to Melton and provides headroom to address unmet needs.
Phill Bamford (Gladman)	FC1/SS2	Reiterate that Six Hills is a viable and deliverable proposal to address the issue of unmet needs from other authorities within the Housing Market Area. Provides an update on propopsals for a settlement of up to 3000 homes at Six Hills, referring to pre-app discussions and community engagement.	Noted.
Phill Bamford (Gladman)	FC1.2, SS2	Seek a change to SS2 to say housing 'requirement', rather than 'need'.	Agree. A minor modification will be suggested during Examination.
Phill Bamford (Gladman)	FC1, SS2/SS3	Delete text citing small site thresholds, to avoid policy being unduly restrictive.	The text provides guidance about the interpretation of the policy and is not considered unduly restrictive.
Martin Herbert (obo Marsh Trust) Brown & Co (Martin Herbert)	FC1.2. SS2	Support representations made by Aspbury Planning on behalf of Barratt David Wilson Homes, in respect of land at Bottesford.	Noted. See comments in response to Aspbury Planning obo BDW Ltd.
Martin Herbert (obo Marsh Trust) Brown & Co (Martin Herbert)	FC1.2. SS3	Concerned that criterion 1. will prevent development where community is against any development, as the evidence will be difficult to obtain.	The policy allows or flexibility depending on the development proposed, location and timing. It offers discretion to decision makers based on the principles of sustainable development.
Martin Herbert (obo Hill Family) Brown & Co (Martin Herbert)	FC1.1, SS2	Housing growth projections are understated, and the HEDNA data should be disregarded. The SGP will support a greater level of growth across the district, and the plan fails to boost significantly the supply of housing. A higher growth target in excess of 7,000 dwellings per annum is needed, as reflected by the Council's evidence.	The HEDNA is regarded as a robust and credible evidence base. It is not clear yet what level of growth the SGP will suggest for Melton – no draft SGP has been published yet. The Council's evidence, set out in the HEDNA, TAHR and the Council report of the 4th July justify the housing requirement of 245dpa in the Plan. The 7000+ target suggested would not be deliverable.

<p>Martin Herbert (obo Hill Family) Brown & Co (Martin Herbert)</p>	<p>FC1.2, SS2</p>	<p>At least 75% of all growth should be focused on Melton Mowbray to support delivery of the Distributor Road.</p>	<p>Evidence within the Viability Study demonstrates that sufficient housing has been allocated within Melton Mowbray to meet contributions to the MMDR, subject to the level of affordable housing provision. The balance suggested was considered at earlier stages but rejected, principally because it provided insufficient scope to provide 'dispersed' growth to sustain rural communities, restricted housing choice and hampered 5 year land supply.</p>
<p>Michele Parker (Burton and Dalby PC)</p>	<p>FC1. SS3/Table 4</p>	<p>Settlement hierarchy does not take account of environmental capacity, the criteria for identifying rural hubs do not accord with NPPF. The level of services, transport / accessibility, heritage and environmental capacity of Great Dalby mean it should be a rural hub and as such have no land allocated. Comments are supported by 108 residents.</p>	<p>The focused changes did not include any proposed changes to the position of settlements within the hierarchy. The Council's justification and evidence remain as cited at Pre Submission Draft stage, and can be found on www.meltonplan.co.uk</p>
<p>Laurence Holmes (obo NMLC) (ANON-7VBY-7HER-X)</p>	<p>FC1, SS2</p>	<p>Promoting about 109ha land at North Melton, planning permission pending for 200 dwellings on part. <ul style="list-style-type: none"> • Support housing requirement of 6125 – makes a valuable contribution to meeting unmet needs elsewhere in the HMA. The Duty to Co-operate has been met. • Seeks a change to Policy SS2 so that it reads 'at least' rather than 'approx' 65%. </p>	<ul style="list-style-type: none"> • Support noted. • 'Approximately 65%' wording provides the flexibility to encompass the 'at least' wording sought. No modification suggested.
<p>Charnwood Borough Council</p>	<p>FC1</p>	<p>Supports recognition of the OAN identified through the latest Housing and Economic Development Needs Assessment 2017 (HEDNA), and notes that the study recommended an economic led scenario as the basis for the OAN for Melton, of 170 dpa (2011-2036). However, there is no clear justification in "Towards a Housing Requirement for Melton Borough Council" for the increase to the 245 dpa in the Melton Local Plan, and that report uses different assumptions from HEDNA. As such, this unilateral evidence conflicts with the requirement to assess housing and economic needs across the wider HMA, especially when the distribution of this development has yet to be formally agreed, and could have significant impacts across the HMA. Any significant increase from HEDNA should be agreed through the Strategic Growth Plan, under the Duty to Cooperate.</p> <p>In simple terms, Melton is planning for 2,775 homes above the demographic scenario over the period 2011-2036. This is reliant on housing need that arises from elsewhere in the HMA or wider afield and cannot be explained through existing migration patterns appearing to be based upon a highway led strategy. This is likely to have wide-reaching implications across the HMA and should therefore be agreed through a strategic planning process.</p>	<p>The HEDNA sets out an OAN figure derived from a consistent assessment across the Housing Market Area. There are however a wider range of local considerations which are relevant in setting the housing target and have been considered in the TAHR Report and Addendum. These include aligning to the Plan's strategic objectives, including in delivering affordable housing for local people; the delivery of the Melton Mowbray Transport Strategy; alignment of the Plan's housing and economic strategies; supporting local service provision; and providing flexibility to meet unmet needs from other parts of the HMA. These are relevant factors in bringing the evidence base together to determine the plan target. The Plan elsewhere (SS6) makes a commitment to participate in the SGP process and to undertake a review if it assigns quantities of development to Melton Borough that exceed that provided for in the Plan. The Jan 2017 'Joint Statement of Co-operation Relating to Objectively Assessed Need for Housing' to which CBC were signatories explained In terms of determining housing targets to be included in their Local Plans, local planning authorities should take account of the requirements of both national policy and local circumstances, including the need to base Local Plans on a strategy that seeks to meet the OAN for housing. In this regard, it is recognised that all authorities are at different stages of plan preparation and that this situation must be accommodated. In determining their housing target over the relevant plan period, therefore, each authority will take into account the HEDNA and other relevant evidence'. MBC consider the TAHR to be such evidence.</p>
<p>Nexus Planning (Justin Cove) obo Richborough Estates</p>	<p>FC1.2 (SS2 & SS3)</p>	<p>Land interest at Great Lane, Frisby on the Wreake. Frisby Neighbourhood Plan is at an advanced stage and should be taken into account in the MLP. Outlines 2 court cases in support of this view and points to the FNP being prepared on the basis of the residual requirement in the emerging MLP at the time.</p>	<p>The progress of the Frisby neighbourhood plan and the difference between the [draft] NDP housing allocations and draft MLP housing allocations is noted. Should the Examiner's report of the NDP be published and/or a NDP be adopted after Local Plan submission and before the close of the Local Plan Examination Hearings, the Council will consider whether to suggest modifications to the local plan Inspector, in respect of its non NDP housing allocations and any housing allocations in the NDP which were not in the submitted MLP. Note that the planning authority has resolved to grant outline planning permission for FRIS3.</p>

<p>Nexus Planning (Justin Cove) obo Richborough Estates</p>	<p>FC1.2, SS2</p>	<p>The revised policy wording should make reference to circumstances where a Neighbourhood Plan is in place in advance of the Local Plan being adopted.</p>	<p>This aspect of SS2 is not the subject of a Focussed Change. The wording reflects NPPF guidance that Local plans and Neighbourhood plans should be compatible with strategic policies and not promote less development (para 184) ".....provided that they are consistent with the strategic objectives and proposals included"</p>
<p>Nexus Planning (Justin Cove) obo Richborough Estates</p>	<p>FC1.2, SS3</p>	<p>The revised policy wording should make reference to circumstances where a Neighbourhood Plan is in place in advance of the Local Plan being adopted.</p>	<p>To do so would duplicate national policy, and would become out of date if more up to date case law provided a different interpretation.</p>
<p>Sarah Allsopp (obo DLP Consultants)</p>	<p>SS2</p>	<p>Land interest at Stathern (off Harby Road) – suggest housing requirement should be 280dpa, at least 7000 homes – as evidenced by sustainability appraisal and Towards a Housing Requirement for Melton. The Housing Requirement (HR) should meet affordable housing needs and should boost significantly housing supply, unconstrained by past delivery rates. Provide a detailed site assessment of their land interest and a layout plan for 44 units. Object to the plan’s overreliance on two large SSNs to deliver most of the housing requirement.</p>	<p>The evidence from TAHR recommended a range within which the HR should be selected, and 245dpa falls well within that range and is therefore evidence based. The SA supports a HR of 245dpa. Long term historic delivery has been about 170dpa, so 245 would represent a significant boost to housing delivery, and is realistic. Information provided noted. The role of the SSNs in the spatial strategy was not the subject of focused changes.</p>
<p>Sue Green HBF</p>	<p>FC1</p>	<p>Policy SS2 - Overall the HBF is supportive of the Council’s position for a higher “policy on” housing requirement figure, but it is noted that the Council’s Topic Paper identifies a range of 5,750 dwellings (230 dwellings per annum) – 7,000 dwellings (280 dwellings per annum). 245 dwellings per annum is towards the lower end of this range and there appears to be little justification for 245 dwellings per annum as opposed to 280 dwellings per annum. It only delivers 75% of housing and is not the Preferred Option 3 of the SA. The HBF and others have criticised the HEDNA for under estimating the OAHN because of :- - Not addressing any potential re-distribution of unmet housing needs within the HMA (in particular from Leicester city) ; - Misalignment of employment and housing strategies ; - Jobs led growth assumptions in particular economic activity rates and resident workforce / commuting ; - Use of HFR as mechanism to adjust for worsening market signals ; - Lack of adjustment to deliver affordable housing. Clearly the Council have similar concerns.</p>	<p>The justification for 245dpa is set out in the TAHR and TAHR Addendum, and the Council’s report of 4th July. The TAHR and its addendum make clear it would be unrealistically ambitious to sustain higher housing delivery in the Borough than the 245 dpa. This is a significant upward step change from historic delivery rates. Whilst the affordable housing need is not met in full, the evidence base and SA have clearly considered higher housing provision and the housing requirement in the plan is informed by delivery considerations consistent to case law. The Council does not have concerns about HEDNA. It identifies the OAN for Melton, whereas the TAHR, its addendum and the Council’s report of 4th July set the ‘policy on’ housing requirement.</p>
<p>Somerby NP Group</p>	<p>FC1</p>	<p>MBC should adopt the lower housing target for the Borough contained in HEDNA 2017 and meaningfully incorporate it into the 2017 SHLAA review and the next draft of the MLP. If there are to be housing ‘allocations’ for the villages then make proportionate downwards adjustments for the lower Borough target. - Comply with 2014 government guidance on the SHLAA process and plan preparation by consulting us: NPPG ref: (Para 008 Reference ID: 3-008-20140306) - Consider a spatial strategy for housing that seeks to distribute small developments across many settlements in the Borough rather than concentrating large developments on a selected few. - Take into account the evidence gathered in preparation of the Somerby Parish NP Consultation.</p>	<p>The HEDNA sets out the Objectively Assessed Housing Need for the Borough. In accordance with national planning practice guidance, the Housing Requirement of 245dpa takes account of a range of national policy considerations and local planning objectives. The SHLAA methodology is not the subject of a focused change, and so this comment is not responded to here. The spatial strategy, spatial hierarchy and the settlements in each tier of the hierarchy were not materially altered by the focused changes, so this comment is not responded to here. The data collected by Somerby has not been verified and is not available in a comparable form for the rest of the borough, and its use could introduce bias. The Council considers its evidence to be robust and proportionate.</p>

Leicester City Council	FC1, FC4.	The scale of the OAN for Leicester means that not all of this need can be accommodated in the administrative boundaries of the city. More clarity needed (including a specific amount of land) on how the MLP is going to meet unmet needs from elsewhere in the HMA, in advance of agreement in HMA wide housing distribution. Suggest that the reserve sites policy be amended to meet unmet needs as well. Also continuing concern about strategic highway impacts.	As the precise level of unmet need from elsewhere in the HMA is not known yet, the MLP cannot be precise about the amount of land in the MLP that is to meet that need. Any housing numbers above the OAN demographic requirement are contributing to meeting unmet housing needs from elsewhere, as well as contributing to meeting the MLP plan objectives. As they have been assessed as suitable, available and achievable, the reserve sites would be considered at the same time as other alternatives, should the plan be unable to accommodate its proportion of the unmet needs from elsewhere. The comments made previously to the PSD representation still stand.
Debra Henson (obo Connolly Land and Developments)	FC1	Welcomes greater flexibility and opportunity brought about by the changes to SS3 but objects that the approach to the settlement hierarchy is too simplified basing on just 4 facilities ignores a wide range that contribute to sustainability.	The settlement hierarchy was not the subject of a focused change, so this comment is not responded to here.
Laurence Holmes (obo Richborough Estates & LCC) (ANON-7VBY-7HEF-J)	FC1.2	Policy SS2 – Development Strategy: The Developers support the draft plan’s retention of an overall housing requirement of 6,125 dwellings for the period 2011-2036, 245 dpa. Recommended that the words “at least” are inserted in place of “approximately” regarding the ability of the Melton Mowbray Main Urban Area to accommodate 65% of the Borough’s housing needs in order to accommodate part of already declared ‘unmet need’.	The wording employed reflects the Council’s conclusions on the overall need as understood at present (note ‘review mechanisms’ in Policy SS6). The wording is positively made in order to meet this need, but that would not preclude further development if necessary and achievable.
Sharon Wiggins (Leicestershire County Council)	FC1 & FC 2	The sequence of housing growth is of particular importance in the Primary and Secondary Rural Centres where a number of individual housing proposals might contribute to the expansion of local primary schools. Clearly, if such developments are not occurring simultaneously then planning for the provision of additional school places can create significant capital funding risks for the Local Authority (if commitment is given to a particular scheme) and may also lead to inefficient use of public resources. The second issue relates to the impact on Secondary provision in the Melton urban area given the lack of clarity around the sequence and size of developments to the north and south of the town and the rural locations that feed to the Melton town secondary schools. Further clarity in this regard will help the Local Authority determine the most appropriate solution for the provision of places. In summary the LA would need to have further information surrounding the timing and scale of development to take account of the cumulative impact of housing proposals in each of the identified locations.	The Five Year Land Supply and Housing Trajectory Position (30th May 2017) sets out the latest understanding of housing land supply of all allocated sites. Where sites are in areas with limited capacity known at present, site specific policies in FC4 include requirements to fund expansion. However this is a volatile area that varies over time and would need to be re-evaluated at the point at which applications are submitted. The principal, however, is a continuation of the traditional approach of requiring developers to find that capacity they generate demand for. The latest trajectories for both areas are included in the The Five Year Land Supply and Housing Trajectory Position (30th May 2017). This will be supplied to the LEA to assist their planning. Support noted - these provisions are incorporated into the policies concerned. This approach is incorporated into the policies concerned. The policies are clear about their capacity within the plan period and can be relied up for the purposes of planning for places and accommodation.
Historic England (Emilie Carr)	FC1.2 / SS3	Historic England welcome the addition of the words ‘where appropriate’ within bullet point 4 of policy SS3.	Support noted

<p>Elizabeth Johnson</p>	<p>FC1.2 - SS1 and SS2</p>	<p>NPPF provides key principles in Paragraph 158 which state that Local Authorities must ensure that Local Development Documents are: “based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the areas. Local planning authorities should ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals”</p> <p>Paragraphs 4.2.1 & 4.2.2. indicate that since the Draft Local Plan was consulted on in November 2016 the Housing and Economic Development Needs Assessment (HEDNA) was produced (Jan 2017). This provides an objective assessment of need for housing following the approach prescribed by Government in Planning Practice Guidance. It identifies an objectively assessed need for the equivalent of 170 new dwellings each year from 2011 to 2036 for the Borough of Melton.</p> <p>This assessment has been dismissed by the authority in favour of Melton TAHR (Jan 2017 & June 2017) and a building rate of 245 d.p.a. has been set. This figure is dependent on predicted economic growth and an above-trend in-migration to the Borough. There is no evidence that such growth is likely – in fact HEDNA indicates that it is unlikely.</p> <p>Throughout the previous plan period a large amount of employment land was allocated (at Asfordby Hill) and this has not been taken up. Employment Land Study June 2015: Table 39 – Employment Land Take-up 1996 - 2015 This high provision of housing with little employment to match it will result in increased unsustainable commuting to employment centres (Leicester, Loughborough, Nottingham) partly on unclassified roads, leading to stress on the infrastructure. To set a housing requirement that far exceeds the objectively assessed need is unsound.</p>	<p>The evidence document ‘DRAFT MELTON LOCAL PLAN: HOUSING REQUIREMENTS’ http://docs.melton.gov.uk:8080/WAM/doc/Report.844307.pdf?extension=.pdf&id=844307&location=volume1&appid=2030&contentType=application/pdf&pageCount=1 in which a range of housing requirements from the evidence is considered. 245 was considered to be the preferred option on the basis of the balance of positive and negative effects it presented. Amongst this is the growthy ambitions of employers within the local economy, the need for infrastructure in order to facilitate growth and the level of affordable housing. As the report explains, the 170 OAN figure would not support these objectives, indeed a case is presented for a higher quantity in order to address several more completely (e.g. see HEDNA table 40)</p>
<p>Dr J Warwick</p>	<p>FC1.2 - SS1 and SS2</p>	<p>Meeting unmet housing needs from elsewhere should be kept as low as possible and a limit set. Consideration should also be given to the impact of Brexit on future housing demand.</p>	<p>The rationale is not explained however meeting unmet need is a requirement of the NPPF. The plan does not cater for unmet need at present but provides 'headroom' above OAN which can be used for this purpose once the quantity relevant to Melton Borough is calculated. This is being progressed through the Strategic Growth plan and the plan's review triggers in Policy SS6 will be employed. This approach has been agreed with all HMA partners and is set out in the Statement of Cooperation. HEDNA has taken into account the impact of Brexit so far as possible bearing in mind the inherent uncertainties.</p>

<p>Elizabeth Taylor</p>	<p>FC1.2 - SS1 and SS2</p>	<p>With reference to the National Planning Policy Framework, the criteria for identifying rural settlements as 'rural hubs' and therefore suitable for certain types and scales of development, have been much reduced on the MBC Local Plan. This is to such an extent that the only 4 NPPF criteria recorded are - 1. Primary School, 2 Access to employment opportunities, 3 Fast Broadband, 4 Community Building Even so, Great Dalby still only meets only one of these, a community building. This strongly indicates that the village has been mistakenly identified as a rural hub on the amended MBC Local plan. Through the inappropriate identification of Great Dalby as a rural hub, the allocation of Land off Burdett Close in the village on the amended MBC Local Plan means that for people living in the village, this is now an entirely different Local Plan to the original. Great Dalby is clearly not a sustainable location for the level of growth now planned for the following reasons: 1. Great Dalby has a limited range of services and facilities with no shops, sports venues, employment or GP surgery; 2. Public transport is limited to a two-hourly bus service with no service at weekends or evenings; 3. The village has a rich historic environmental which is irreplaceable and the Conservation Area includes most of the built-up area of the village but also includes areas of open land north of Burrough End and east of Main Street. 4. The residents of Great Dalby need to travel in to nearby Melton Mowbray for work, recreation and service provision by unsustainable modes of transport.</p>	<p>The Focused Changes did not include any changes to the hierarchy of settlements and remain as set out in the pre submission draft, and justified by the adequate and proportionate evidence set out in the Review of the Settlement Roles and Relationships Report 2016, and the Consideration of Settlement Roles and Relationships Report to MBC, September 2016. It is considered that Gret Dalby appropriately qualifies as a Rural Hub under this methodology and its requirement is appropriate under the 'proportionate approach' devised by SS2. The Plan does differ from the 2016 Pre submission draft which is the reason further consultation has taken place. There is no evidence that the Conservation Area renders Great Dalby an unsuitable location, though clearly such factors are important in the consideration of individual sites which is the subject of FC4.</p>
<p>Martin Lusty, WOTWTA NP Group</p>	<p>FC1.2 - SS1 and SS2</p>	<p>This section fails to acknowledge the recently announced government strategy in respect of electric vehicles. There is a need for charging points throughout the Borough and the infrastructure to support them. This section fails to acknowledge the recently announced government strategy in respect of electric vehicles. There is a need for charging points throughout the Borough and the infrastructure to support them.</p>	<p>The Melton Mowbray Transport Strategy will be developed in accordance with Government guidance. It will be a 'live' document, allowing it to be updated to reflect technological advances.</p>
<p>Maurice Fairhurst o.b.o J Orson</p>	<p>FC1.2 - SS1 and SS2</p>	<p>Objection relates to the allocation of land at Debdale Hill Field, Old Dalby (OLD3) as a reserve site for 23 units. This site is not as well positioned to serve this requirement as my clients site which was first put forward as a SHLAA site on the 14th November 2016 and which was then the subject of a "Deliverability" questionnaire in May 2017. This site was then given a reference number MBC/004/17. I have seen no adequate explanation of why the now proposed OLD2 is a preferred reserved site to that of my clients. As I said in my SHLAA submission, my client's site is more closely related to the built up framework of the village than the currently proposed OLD2. It occupies lower lying land and is topographically more suitable for development. 23 to 30 dwellings would be accessed more easily and development here would be closer to village facilities. If designed and constructed in appropriate materials and appropriately landscaped, it would not impact as significantly on the character and appearance of the village or its rural setting as would 23 dwellings on site OLD2.</p>	<p>The housing site assessments underpinning Focused Change 4 were based on the most up to date information and data that was available on a comparable basis across the whole of the Borough at the time, for a relevant range of sustainability, suitability and achievability factors. The Council consider this to be adequate and proportionate evidence, as per NPPF para. 158.</p>

Paul Girdham	FC1 - SS1 and SS3	Long Clawson. Not taken any consideration to the wishes of the people who live there.	The NP in question has yet to be Examined or subject to Referendum and as such its content is not yet established. All representations received were given the same consideration and a wide range of amendments to the Plan were proposed as a result of 'Focussed Changes', responding to comments made and new/updated information. This comment offers no rationale as to why the Plan may be considered unsound.
Dr R Thew	FC1	More recognition and reflection of NDP needed across the local plan, especially site allocation and housing numbers. NDP result of significant work.	Alignment of the Local Plan and Neighbourhood Plans is likely to occur during Examination of the Melton Local Plan, by means of suggested modifications, if any neighbourhood plans have reached an advanced stage since Local Plan submission (post Inspector's report).

