Response ID ANON-MWX6-MJE3-1

Submitted to Melton Local Plan Update: Issues and Options Consultation
Submitted on 2024-01-03 10:15:21

Introduction

Definitions

How to use the Issues and Options

About you

What is your name?

Name:
Kathryn Staley

What is your organisation? (if relevant)

Organisation:
Somerby Parish Council

What is your Job Title/Role (if relevant)

Job title/role:
Clerk

What is your email address?

Email:
██████████████████

Are you making a submission on behalf of someone else?

No

If you are submitting on behalf of someone else, please provide details:

Name (on behalf of):

Organisation (on behalf of):

About you (equalities questions)

Please provide the first 5 digits of your Postcode (for example LE13 1).

Enter the first 5 digits of your postcode:

Gender: How do you identify?

██████████

If self-describe, please state :

Would you describe yourself as transgender?

██████████

What is your sexual orientation?

██████████

If other, please state:

What is your age?

██████████

Do you consider yourself to have a health problem or a disability which has lasted, or is expected to last at least 12 months?

██████████

If you selected other, please state:

What is your ethnic origin?

Please describe your ethnicity and race:

What is your religion?

██████████

Please state your religion:

Vision and objectives

Relevant context to respond to the questions below

Question 1: Looking at the options above, which option do you support?

Question 1 - Option 1: No change:
Strongly disagree

Question 1 - Option 2: Refocused and simplified version [preferred option]:
Somewhat agree

Question 2: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this section

Please, provide further context:

There are now 13 fully made Neighbourhood Plans (NDPs) in the Borough, including our Somerby NDP. Over 4,000 people have voted 'yes' to a NDP in their area. They are legally and democratically important.
We ask for NDPs to be acknowledged prominently and positively in the Vision, Delivering the Vison and Objectives.

A VISION FOR MELTON BOROUGH:

- Schools, shops' are only examples of services. Not everywhere has them, and there are other kinds. Delete 'schools, shops' and simply say 'facilities and services'.

- Amend the line 'Both in Melton Mowbray and many of the villages' to simply 'Both in Melton Mowbray and the villages'.

- The main Vision does not mention the natural environment or biodiversity at all. This is a serious omission. It unbalances the Vision. We realize 'nature' appears at the bottom of 'Delivering the Vision' but it belongs in the main Vision equal to historic character, economy etc. Amend to 'The strong historic and landscape character, natural environment and biodiversity...'

-The words 'as apparent and cherished as ever' are weak. The words 'as ever' rule out any aspiration to improvement. Delete 'apparent and cherished as ever' and replace with 'protected and enhanced' or similar.

- Vision should include an aspiration of involved and engaged communities. We're not sure how to word this but it would lead into mention of NDPs in 'Delivering the Vision' (below). Perhaps at the end of the very first line add 'with Borough businesses and communities engaged and involved in planning and decision-making'. MBC does involve and engage its communities (you are doing it now!) which is something to be proud of, so put it in the Vision.

- We don't think the Vision is too long. Everything in it is important. But it would be easier to read (and look better) if broken down into 3-5 shorter paragraphs. There are natural 'breaks' where this could be easily done.

DELIVERING THE VISION

- The first sentence 'the Borough Council will work with partners and others...' is a bit vague and does not engage anyone in particular. Expand it slightly to 'the Borough Council will work with partners, businesses, neighbourhood planners, communities and others...'

STRATEGIC OBJECTIVES

Here the whole Vision/Delivery/Objectives starts to seem over-long. To shorten it we suggest:

- All 10 bullet points of Delivering the Vision are covered in your Strategic Objectives, in different words. You don't need both.

- Combine the bullet points of Delivering the Vision with the Strategic Objectives. There's a lot of duplication between them. This would only be a matter

of editing. So, keep the opening paragraph of Delivering the Vision (preferably with our suggested amendment) then go straight into Strategic Objectives. To keep the important line 'We will facilitate a sustainable pattern of high quality development' it could be your first strategic objective.

- To your 7 'key issue' bullet points add one more:

"Ensure the historic character of the built environment, both rural and urban, and the character of the
surrounding landscapes and settings, is protected and where possible enhanced by any new
development."

Question 3: What do you think are the most important objectives to be covered by our Vision? Please select your top 3

Question 3 - Improving facilities for all of the community and providing the new infrastructure needed to support our growing population:
2

Question 3 - Addressing the causes and effects of climate change:

Question 3 - Ensure local housing meets the local communities current and future needs:

Question 3 - Supporting a diverse, competitive and innovative rural economy:

Question 3 - Enhancing Melton Mowbray's town centre:

Question 3 - Promoting high quality and well-designed development to help create healthy, sustainable and safe communities:

Question 3 - Enhancing nature and minimising harm to the natural environment:
1

Question 3 - Other (please specify below):
3

Please, provide further context:

Protecting and enhancing the historic built and landscape character of the Borough

Policy SS1. Presumption in favour of Sustainable Development

Policy SS1: Relevant context to respond to the questions below

Question 4: Looking at the options above, which option do you support?

Question 4 - Option 1: Delete the policy:
Somewhat disagree

Question 4 - Option 2: Amend the policy [preferred option]:
Somewhat agree

Question 5: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

We support the changes under Option 2, which are both necessary and only administrative/editorial.

However, a change to the second sentence of SS1 is also necessary, because on a plain reading that sentence could support proposals which are 'possible' even if they are unsustainable. That is not what anybody wants.

We assume the policy was derived from NPPF para 38, which says:

"Decision-makers at every level should seek to approve applications for sustainable development where possible."

So the NPPF does not ask you to approve everything 'possible', only sustainable development. Therefore, to align with the NPPF, amend the second sentence similar to:

'...find solutions which mean that proposals for sustainable development can be approved wherever possible'

Policy SS3. Sustainable Communities (unallocated sites)

Policy SS3: Relevant context to respond to the questions below

Question 6: Looking at the options above, which option do you support?

Question 6 - Option 1: Delete the policy:
Strongly disagree

Question 6 - Option 2: Review the policy to better define meeting local need:
Strongly agree

Question 6 - Option 3: Review the policy to enhance wider sustainability [preferred option]:
Strongly disagree

Question 7: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

We agree with the issues raised at 4.2.1 (especially the first one) but DISAGREE that Option 3 is best. We strongly believe Option 2 is the best, but with modification.

We will also identify a third issue with Policy SS3. In doing so we will have to refer to Policy SS2 (which we know is not under review) and para 4.2.17 of the MLP. Please bear with us.

ADVANTAGES OF OPTION 2:

- The difficulty is knowing what constitutes 'proven local need as identified by substantive evidence'. We have experienced that difficulty ourselves, as have MBC. We have had no difficulty with any other part of SS3. Option 2 is best because it's the only one which addresses the identified difficulty.

- We urge you to retain in SS3 the example 'within a Neighbourhood Plan or appropriate community led strategy'. That empowers Neighbourhood Planners to support small-scale sustainable development in their areas (where in conformity with the MLP of course).

- Preferred approach: Proof of need and evidence required to prove it should be proportionate to the scale of the proposal. Thus, it would be easier to prove the need for a single small 'affordable' dwelling than for large or multiple dwellings.

In the case of single dwellings, substantive evidence could include:
- Proposal comprises infill, and:
- Existing resident wishing to downsize, or
- Former resident wishing to return to the settlement, or
- Person with an immediate family connection in the settlement wishing to move there, or.
- Person wishing to move to the settlement with a business/employment purpose.
- If the proposed dwelling was to be large (4+ beds) the need for that size of dwelling would have to be specifically proven.

- For multiple dwellings, it is reasonable to require a formal housing need assessment, proving need for the number and type/size of dwellings proposed.

- The potential number of 'multiple dwellings' is already suggested by MLP Policy SS2 and paragraph 4.2.17: up to about 10 in Service Centres, 5 in Rural Hubs and 3 in Rural Settlements. We suggest UPGRADE Para 4.2.17 from supporting text to policy. Supporting text carries little weight, particularly in appeals. 4.2.17 is presently associated with Policy SS2 which is not under review, but it could be incorporated into policy SS3. The word 'about' should be removed as it is vague. Just say up to 10/5/3 dwellings.

POSSIBLE PROBLEMS WITH OPTION 2?

The 3 bullet-pointed 'issues with Option 2' are not significant or problematic. To address them individually:

• Wider sustainability issues are important but do not belong in policy SS3. Sustainability of settlements generally is addressed by the spatial strategy and policy SS2. This would be reinforced by making para 4.2.17 part of policy SS3 (as suggested above). Other aspects of sustainability fit better in policies C7, EN7, EN8, EN9, IN2, IN3, and D1 (which are under review).

• Clarifying 'proven local need' would not weaken community projects or NDPs, as long as the example of substantive evidence 'within a Neighbourhood Plan or appropriate community led strategy' is retained. That example does not undermine but empowers NDPs and communities.

• We agree care must be taken with the 'proven local need' criteria, but that is no reason not to have them. Yet again, elevating para 4.2.17 to policy would safeguard against over-development. The other clauses 2-6 of policy SS3 are also safeguards, especially by signposting EN1, EN4, EN6 and D1.

DISADVANTAGES OF OPTION 3:

- Option 3 simply does not address the identified problem ie. What is meant by 'proven local need' and 'substantive evidence'.

- To include 'needs of generations to come' and 'wider social, economic and environmental sustainability criteria' in policy SS3 would be difficult and complicated to draft. See our comments under the first 'bullet' above – these important issues belong in other policies such as C7, EN7, EN8, EN9, IN2, IN3 and D1. Option 3 is too wide in scope for one policy.

IMPORTANT QUERY:
Policy SS2 opens with the words 'In rural settlements...'. Does this mean Policy SS2 only applies to 'rural settlements' in the strict sense of MLP Table 4

(p.25) and the list on p.26? We think it is intended to apply to all settlements outside the urban area ie, Rural Settlements, Rural Hubs and Service Centres. We think this because points 1-6 are clearly relevant and appropriate in any settlement eg. Not increasing risk of flooding.

WE SUGGEST change the opening words of SS3 to something like "In settlements outside the main urban areas...'.

Question 8: Under what circumstances do you think new homes in the borough's smallest and least sustainable settlements are justified?

Please, provide further context:

Where there is a proven local need identified by substantive evidence. This brings us back to what constitutes 'proven local need' and 'substantive evidence' and the need for clarification, which we have addressed in Question 7 and by our preference for Option 2.

MLP Para 4.2.17 should be part of policy SS3. We could then rely on the numbers of up to 10/5/3 in Service Centres/Rural Hubs/Rural Settlements. This would not be 'carte blanche' for unlimited development in the small settlements; all other policies would have to be complied with.

We strongly support that a 'Neighbourhood Plan or community-led strategy' can provide the substantive evidence, as SS3 already allows.

Question 9: Do you think criteria should be introduced to require homes built in the borough's smallest and least sustainable settlements to be built to the highest sustainability standards? If yes, what types of criteria do you think the policy should consider?

Please, provide further context:

NO, Not specifically in the smallest settlements. That would be illogocal. High sustainability standards are most important where the most houses are being built, which is Melton town. There is no reason why sustainability standards should be any higher or lower in Melton or elsewhere.

The villages have a housing affordability problem. MBC recognized this in its 'value area' formula, and polices on agricultural workers' dwellings and rural exception sites. It would be harmful to introduce higher sustainability requirements in settlements where housing is already the least affordable, and the environmental benefit would be small due to the low number of houses.

Standards in construction are more a matter of building regulation than planning, and their technical (and frequently changing) nature makes them difficult to detail in a Local Plan. We are doubtful whether MBC could legally impose higher standards than the National ones. You could look at Somerby Parish NDP policy CD1 and Appendix 8 for our efforts to ensure sustainability in construction.
In the MLP any such criteria would belong in policies other than SS3, such as EN9 and D1.
Having answered 'no' we do not suggest any criteria.

Policy SS4. South Melton Mowbray Sustainable Neighbourhoods

Policy SS4: Relevant context to respond to the questions below

Question 10: Looking at the options above, which option do you support?

Question 10 - Option 1: Delete the policy:
Somewhat disagree

Question 10 - Option 2: Amend to reflect the 2021 Masterplan [preferred option]:
Strongly agree

Question 11: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Option 2 is evidence based. It reflects changes already made, and intended to improve service provision (especially education) in the SSN.

ADDITIONAL EMPLOYMENT LAND
We assume this would be part of the SSN itself but do not know the outcome of your 'call for sites'.
As an example within our parish, land such as that on Stygate Lane between the A606 and Pickwell is NOT suitable for large-scale employment/commercial development, due to its remoteness from any workforce, landscape character, heritage value, environmental sensitivity and poor access roads. We have explained this in detail in objections to planning applications 19/00419/CM (anaerobic digester) and 22/01292/FUL (poultry barns).

Policy SS5. Melton Mowbray North Sustainable Neighbourhood

Policy SS5: Relevant context to respond to the questions below

Question 12: Looking at the options above, which option do you support?

Question 12 - Option 1: Delete the policy:
Somewhat disagree

Question 12 - Option 2: Amend to reflect the 2021 Masterplan [preferred option]:
Somewhat agree

Question 13: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Option 2 is evidence based and/or reflects changes in effect already made, and intended to improve service provision (especially education) in the NSN.

Policy SS6. Alternative Development Strategies and Local Plan Review

Policy SS6: Relevant context to respond to the questions below

Question 14: Looking at the options above, which option do you support?

Question 14 - Option 1: Delete the policy:
Strongly agree

Question 14 - Option 2: Reduce to locally specific criteria only [preferred option]:
Somewhat disagree

Question 14 - Option 3: Additional criteria:
Somewhat disagree

Question 15: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

The importance of policy SS6 is lost to the legal requirement to review the Local Plan at least every 5 years. Nothing prevents it being reviewed sooner.

We do not think triggers for review have to be identified in advance. Attempting to do so may limit MBC's ability to react to unforeseen but important circumstances.

The policy is unnecessary and possibly restrictive on MBC.

Definitions

Policy C2. Housing Mix

Policy C2: Relevant context to respond to the questions below

Question 16: Looking at the options above, which option do you support?

Question 16 - Option 1: Delete the policy:
Strongly disagree

Question 16 - Option 2: Amend the policy [preferred option]:
Strongly agree

Question 17: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policyPlease, provide further context

Please, provide further context:

The issues raised at 8.0 are serious. We are gravely concerned if developments are not providing the needed housing mix. We know why this happens: 4+ bed houses are more profitable. We therefore strongly support Option 2.

• Yes, move Table 8 from the supporting text into the body of Policy C2.

• Yes, remove the word 'optimum' from policy Table 8. Just say 'Housing mix requirements'.

• Yes, remove the words 'having regard to market conditions and economic viability' from the policy. Concern about unintended consequences is noted, but we would rather have the right houses later than the wrong ones sooner. Once the mix is wrong it is wrong forever.

• We would like to see housing mix applied to developments of 5 or more houses in the rural areas, much as you propose for affordable housing in the review of Policy C4. Housing mix to meet identified need is a benefit both urban and rural communities should share.

• Like MBC we have noticed applications for large houses including one or more of study, playroom, office, library, hobby room etc. These are attempts to

wrongly present the house as 'smaller'. These miscellaneous rooms should count as 'bedrooms' for policy purposes, as the objective is to quantify the size/affordability of the house. If MBC cannot do this as a matter of practice by decision-makers, we can think of no alternative to defining 'bedroom' in policy. Unfortunately, this might have to be by exception ie. Something like 'any room which is a bedroom, or which is habitable and not a living room, kitchen or bathroom'. However you do it, this loophole needs closing.

Policy C3. National Space Standard and Smaller Dwellings

Policy C3: Relevant context to respond to the questions below

Question 18: Looking at the options above, which option do you support?

Question 18 - Option 1: Delete the policy:
Somewhat disagree

Question 18 - Option 2: Amend the policy [preferred option]:
Somewhat agree

Question 19: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Prefer option 2.

It is rational and moral that affordable homes should be designed to the same Nationally Described Space Standards as market homes.

Homes England funding is desirable. It would be difficult to justify ruling out that funding.

Option 2 would simplify consideration of design standards, especially if considering a design before there is certainty whether any individual dwelling will eventually be affordable or not (eg. At pre-application or outline stage).

Definitions

Policy C4. Affordable Housing Provision

Policy C4: Relevant context to respond to the questions below

Question 20: Looking at the options above, which option do you support?

Question 20 - Option 1: Delete the policy:
Strongly disagree

Question 20 - Option 2: Amend the policy to reflect National Planning Policy Framework and new evidence [preferred option]:
Strongly agree

Question 21: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Unaffordability of housing is an identified problem nationally, locally and in Somerby parish.
Developers will not voluntarily build affordable housing (in the NPPF defined sense) unless required by policy. We therefore strongly oppose Option 1 (deleting the policy.)

We support Option 2 because:

• Necessary to remain consistent with the NPPF.

• A Local Plan should use best evidence, which is now in HENA 2022 and any subsequent Local Housing Needs Assessment.

• YES to an affordable housing requirement in developments of 5 or more dwellings in the rural areas. There is potential for small-scale 'windfall' sites in the villages, but they need affordable houses at least as much as Melton town. [QUERY: Does the NPPF allow this? We hope so, but thought it could only be done in an area 'designated as rural' by the Secretary of State?]

SUGGESTION: The small Rural Settlements may possibly sustain developments of up to 3 dwellings (MLP para 2.4.17), so could the affordable requirement in them apply to developments of 3 or more? Due to operation of the percentages, this would only result in an affordable home in Value Area 1 (40% affordable), but that is where homes are the most expensive, so it would be appropriate.

Definitions

Policy C7. Rural Services

Policy C7: Relevant context to respond to the questions below

Question 22: Looking at the options above, which option do you support?

Question 22 - Option 1: Delete the policy:
Strongly disagree

Question 22 - Option 2: Amend the policy [preferred option]:
Somewhat agree

Question 23: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

We agree with Option 2 because there is no reason why community facilities in the 'suburbs' should be less valued and protected than those in Melton Town centre or the rural areas. We also agree that guidance on the documentary evidence required for criterion 2 would be helpful, but would not go far enough.

SUGGESTIONS:

- In criterion 1, to 'fulfll the role of the existing use/building', add 'considering any differences in the amenity characteristics of the possible alternative, and whether the facilities are used simultaneously'.

- Clarify the meaning of 'no longer viable'. In our parish, a community venue was simply sold to a developer who then said 'I am the new owner, I do not run community facilities, I build houses. It is not viable FOR ME to run a community facility.' There was no 'realistic prospect' of continued community use because the new owner locked the doors and forbade it.
In other words, 'viable' was taken only to mean financially viability for the new owner. Running a community facility will never be 'viable' for an owner not willing to engaged in that activity.
We ask for 'no longer viable' replaced by something like:

"It's current use is no longer required by the community using it".

- To put this another way – elevate 'consideration b' to a new 'criterion 3' which must be satisfied in addition to criterion 1 or 2.

- We agree with the '12 months marketing' suggestion (as it may find someone wishing to operate the building as a community facility) but ONLY as an additional criterion. It should not undermine or over-ride the other criteria.

Policy C8. Self Build and Custom Build Housing

Policy C8: Relevant context to respond to the questions below

Question 24: Looking at the options above, which option do you support?

Question 24 - Option 1: Delete the policy:
Somewhat disagree

Question 24 - Option 2: Address increasing needs:
Neither agree nor disagree

Question 24 - Option 3: Address increasing needs and add local-specific criteria [preferred option]:
Somewhat agree

Question 24 - Option 4: Adding the two optional local eligibility tests:
Somewhat disagree

Question 25: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

It is important that not every proposal to build or commission a single dwelling qains support from a 'self build' policy. The policy is not intended to support the building of luxury homes. It is easy to say a proposal is intended to be lived in by the applicant, but not enforceable. Once built, a private property can be rented out or sold.

- YES to reducing the threshold from 100+ to 20+, as a proportionate measure to increase supply against the identified increase in demand.

- YES to support for smaller / more affordable proposals. The intention is to support people making a home affordable for themselves by their own

efforts, not to support large / luxury homes which would not otherwise receive approval (what we have sometimes heard described as 'Grand Designs'.)

- For single dwellings, incorporation of self-build into another existing policy (probably Policy SS3) may be sound. This would avoid possible conflict between the two policies, and make clear that all the criteria of (probably) SS3 also apply to self-build, and are to be taken together. We have previously siad SS3 should apply to all 'villages' not just Rural Settlements.

- Delete 'encouraging exemplar sustainable housing options'. It is unclear what that means – location, material, energy efficiency, design? Why should self-builds be more 'exemplar' than builds by professional developers? Not justifiable if the intention is to make modest self-builds more 'affordable' by the applicant's own efforts.

Policy C9. Healthy Communities

Policy C9: Relevant context to respond to the questions below

Question 26: Looking at the options above, which option do you support?

Question 26 - Option 1: Delete the policy:
Somewhat agree

Question 26 - Option 2: Revise the policy but also make health and wellbeing a key thread that runs throughout the entire plan [preferred option]:
Somewhat disagree

Question 27: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Existing wording makes little sense. It begins 'All development proposals should make a positive contribution to...' then lists things like employment, sports grounds and integrated transport networks to which 'all development proposals' cannot possibly contribute. For example, a single build, or a porch? If retained, most of the policy can only apply to major development (10+ houses etc.)

The policy reads as a rambling list of aspirations across many policy areas and different possible sizes and type/use of development.

We agree that nearly all the aspirations of C9 appear with greater clarity in other policies of the MLP. The few that do not could easily do so. For example, clustering of takeaways, payday lenders etc. could be addressed under polices EC5, EC6 and/or EC7.

Even requirements for a HIA could appear in another policy. C1 would be best for allocated sites, but is not under review. SS4 and SS5 would be suitable policies to require a HIA in those large neighbourhoods. Possibly in EC1, EC2 and EC4 for commercial/employment proposals above a threshold size? Possibly in D1 for residential development above a threshold size?

If C9 must be retained solely to enable HIAs (which we support) re-name it 'Policy C9 - Health Impact Assessments'.

Question 28: Do you think the Local Plan should require Health Impact Assessments for large scale developments?

Yes

Question 29: If you answered 'yes' to question 28, what size and types of development do you think should require them and why?

Please, provide further context:

We are guided by 'Health Impact Assessment in spatial planning' (Public Health England, October 2020), especially the examples of LPA policies in Annex 3.
We are convinced by the justifications for HIAs in that document.
There are 3 different levels of HIA which can be applied proportionately to different scales and type of development. The larger the proposal the more impact (positive or negative) it is likely to have. We support proportionality in planning matters.

ALL DEVELOPMENT PROPOSALS
If the LPA deems a proportionate HIA necessary based on area-specific evidence for example (but not restricted to) poor health outcomes, vulnerability in the population, or in the case of commercial/employment proposals, the scale and/or nature of the proposed activity, and substances or noise to be produced, handled or emitted by the development.

RESIDENTIAL DEVELOPMENTS
20-99 dwellings (or 1000-4999 sqm floorspace) : extended screening or rapid HIA.
100+ dwellings (or 5000+ sqm floorspace) : full HIA.
or
Development requires an Environmental Impact Assessment.

EMPLOYMENT/COMMERCIAL DEVELOPMENTS
Area of development exceeds 0.5 ha.
Or

Development requires an Environmental Impact Assessment.

Policy EC1. Employment Growth in Melton Mowbray

Policy EC1: Relevant context to respond to the questions below

Question 30: Looking at the options above, which option do you support?

Question 30 - Option 1: Delete the policy:
Strongly disagree

Question 30 - Option 2: Amendments to reflect Use Class Order, new evidence and National Planning Policy Framework:
Somewhat disagree

Question 30 - Option 3: Create separate policies for employment allocations and employment development in Melton Mowbray:
Strongly agree

Question 31: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Do not delete as MBC needs to be able to allocate employment land, to achieve balanced, sustainable growth.

Employment land allocations should be in or on the edge of Melton Mowbray, Asfordby (and possibly Bottesford) for proximity to potential workforce (minimizing travel to work especially car use).

We agree the policy must be revised to account for changes to NPPF, new Use Classes, and new 'best evidence' in HENA 2022.

We agree two policies would be clearer than one, mirroring the policy approach to housing development.

Question 32: Unless submitted already as part of the Employment-only Call for Sites (June-July 2023), is there any employment site you want us to consider as a potential allocation? If there is, please submit the details, including a location plan showing the boundaries to planningpolicy@melton.gov.uk and add a note in this section

Please, provide further context:

No suggestions at this time.

Representing Somerby Parish, we take this opportunity to say that Stygate Lane between the A606 and Pickwell is NOT suitable for large-scale employment/commercial development, due to its remoteness from any workforce, landscape character, heritage value, environmental sensitivity and poor access roads. We have commented on this at length in objections to planning applications 19/00419/CM (anaerobic digester) and 22/01292/FUL (poultry barns).

Definitions

Policy EC2. Employment Growth in the Rural Area (Outside Melton Mowbray)

Policy EC2: Relevant context to respond to the questions below

Question 33: Looking at the options above, which option do you support?

Question 33 - Option 1: Delete the policy:
Strongly disagree

Question 33 - Option 2: Policy Wording Amendments [preferred option]:
Somewhat disagree

Question 34: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Existing wording is unclear whether points 7-8 apply to all of points 1 -6 or only to point 6. We think all of points 1 – 6, and minor change to the wording/punctuation is necessary to make this clear.
Point 4 of the policy should be retained.

THE REFERENCE TO NPPF PARA 85 IS UNACCEPTABLY SELECTIVE, AND SERIOUSLY MISLEADING:

After the part quoted, Para 85 goes on to say:

"It will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport)".

So, reference to 'character and accessibility' as considerations in point 4 is in accord with para 85. To make it more so, amend from 'character of the site and its accessibility' to 'character of the site, sensitivity of its surroundings, and its accessibility'.

We are likely to object at a later stage to any draft policy based on part, but not all, of NPPF para 85.

Employment sites far from population bases and without public transport are inherently, by their location, less environmentally sustainable.

Policy EC3. Existing Employment Sites

Policy EC3: Relevant context to respond to the questions below

Question 35: Looking at the options above, which option do you support?

Question 35 - Option 1: Delete the policy:
Strongly disagree

Question 35 - Option 2: Add specific class uses to policies:
Somewhat disagree

Question 35 - Option 3: Adding Flexibility to the Policy:
Somewhat agree

Question 36: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Option 1 would be harmful. Proportionate protection of employment sites is necessary to ensure balance between planned population growth and employment opportunity.

Option 2 would have limited effect due to changes in permitted development rights, and for Use Classes other than E may unduly constrain business. Inflexible and difficult to get the detail right with an unpredictable economy and possibly further changes to permitted development rights.

Option 3 (preferred) makes essential amendments to reflect changes to Use Classes and permitted development. Otherwise makes 'minimum change necessary' which is sound, as we have no information that the existing policy is actually failing.

Definitions

Policy EC4. Other Employment and Mixed-use Proposals

Policy EC4: Relevant context to respond to the questions below

Question 37: Looking at the options above, which option do you support?

Question 37 - Option 1: Delete the policy:
Strongly agree

Question 37 - Option 2: Wording amendments and define Mixed-use Development:
Strongly disagree

Question 37 - Option 3: Split the Policy:
Somewhat agree

Question 38: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Prefer Option 1 – Delete. EC1 and EC2, and possible EC7, are the better policies in which to show support for mixed use without risking conflict with a separate policy. A limited policy in support of low-impact Homeworking could be retained (we have one in our NDP at Policy EE3).

Option 2 - Probably not possible, and definitely difficult, to formulate a definition to cover all possible mixed uses (eg. from minor homeworking to major developments).

Option 3 – Present policy makes no reference at all to natural environment/ecology/biodiversity. This is an unacceptable omission; on plain reading, they are not considerations at all if the proposal is 'mixed'. if the policy is retained, it is essential to add a 'bullet' valuing natural environment and biodiversity.

Concerning Point 3 of the existing policy, we agree it needs amendment to accord with NPPF para 85, but by STRENGTHENING IT NOT DELETING IT. Para 85 is quoted in a misleading way, failing to mention the second part which says:

"It will be important to ensure that development is sensitive to its surroundings, does not have an unacceptable impact on local roads and exploits any opportunities to make a location more sustainable (for example by improving the scope for access on foot, by cycling or by public transport)". Therefore, reference to accessibility other than by car is entirely in accord with NPPF para 85, and to make it fully in accord, reference should be added to sensitivity to its surroundings.

We will object strongly to any draft policy which fails to mention accessibility or natural environment/biodiversity. We will argue that it is not in accordance with the NPPF, including (but not limited to) para 85.

Town Centre and Retail Evidence

Relevant context to respond to the questions below

Question 39: Looking at the options above, which option do you support?

Question 39 - Option 1: Focus on Melton Mowbray Town Centre:
Somewhat agree

Question 39 - Option 2: Carry out a full Town Centre and Retail Study including needs assessments:
Somewhat disagree

Question 40: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this section

Please, provide further context:

As a rural parish council we don't know what level of study/assessment is necessary to provide soundness for this part of the MLP.

We note that the 2015 study turned out to have very limited predictive value, and the 'issues' paragraph does not show much confidence that a comprehensive (costly) study would be of high value for plan writing purposes.

We recommend the MINIMUM LEVEL OF STUDY TO DEMONSTRATE SOUNDNESS, rather than anything more comprehensive and costly.

Definitions

Policy EC5. Melton Mowbray Town Centre

Policy EC5: Relevant context to respond to the questions below

Question 41: Looking at the options above, which option do you support?

Question 41 - Option 1: Delete the policy:
Strongly disagree

Question 41 - Option 2: Update and incorporate elements of the Town Centre Vision [preferred option]:
Somewhat agree

Question 42: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

DO NOT DELETE. Decline in retail outlets doesn't prove that the policy isn't performing well. Decline in town centre retail is national and ongoing. The policy may be lessening the decline, therefore do not delete it.

In this policy area a 'sequential approach' is useful for plan writing but less so for decision-making after the plan is written. Planning applications come one at a time, for a site the applicant has available. They do not offer 2 sites for MBC to choose between ie. No multiple options to apply the sequential approach to.

YES to policy amendments necessary to reflect changes to Use Classes, NPPF and Planning Practice Guidance.

YES to the need for a proportionate but not excessive update of evidence. (see question 40).

Definitions

Policy EC6. Primary Shopping Frontages

Policy EC6: Relevant context to respond to the questions below

Question 43: Looking at the options above, which option do you support?

Question 43 - Option 1: Delete the policy:
Somewhat disagree

Question 43 - Option 2: Amend the policy [preferred option]:
Somewhat agree

Question 44: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Agree with policy amendments necessary to reflect changes to Use Classes, NPPF and Planning Practice Guidance.

Agree the need for a proportionate but not excessive review/update of evidence. (see our response to question 40).

Unfortunately, new permitted changes to Use Class leave this policy with relatively room to operate.

Definitions

Policy EC7. Retail Development in the Borough

Policy EC7: Relevant context to respond to the questions below

Question 45: Looking at the options above, which option do you support?

Question 45 - Option 1: Delete the policy:
Strongly disagree

Question 45 - Option 2: Amend the policy [preferred option]:
Strongly agree

Question 46: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Do not delete the policy. The policy protects the Melton Town retail offer, as well as protecting the rural areas from large out-of-town retail developments (shopping centres, fast food chains etc) which we would consider harmful.

YES to policy amendments necessary to reflect changes to Use Classes, NPPF and Planning Practice Guidance.

YES to a proportionate but not excessive review/update of evidence. (see question 40).

SUGGESTIONS:

- Present policy is not completely clear where a RIA is required. Surely a RIA could be appropriate in open countryside which is not a settlement at all? For clarity and effectiveness, apply the requirement to the whole Borough (keeping the exception for small independent shops etc. under 200 sq.m.)

- Add a point making explicit that the cumulative effect of any proposal will be material to the RIA and the determination. This would comply with the Environmental Impact Assessment Regulations (2017), Schedule 3, para 1 (which incidentally is not mentioned anywhere in this consultation document).

Definitions

Policy EC8. Sustainable Tourism

Policy EC8: Relevant context to respond to the questions below

Question 47: Looking at the options above, which option do you support?

Question 47 - Option 1: Delete the policy:
Strongly disagree

Question 47 - Option 2: Clarify the policy to focus on socio-economic benefits:
Somewhat agree

Question 47 - Option 3: Amend the Policy to define sustainable tourism:
Somewhat agree

Question 48: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

We think options 2 and 3 are not mutually exclusive. You could do both.

SUGGESTIONS:

- Point 1. is important outside Melton town and should be not only retained but strengthened. It assumes there will always be a 'host settlement' but this isn't always the case as proposals could be put forward in open countryside eg. Farm shops, B&B.
Therefore, amend Point 1 to 'appropriate scale in the context of the landscape, setting and surroundings, and any host settlement'.

- The second main paragraph starting "Attractions…" is describing a sequential approach. It would be better to use the term 'sequential approach' for consistency with other policies eg. EC5. As for EC5, we think a sequential approach is useful in plan preparation but less so in determining applications. This is because applications are made on whatever land is owned by or available to the applicant; there are rarely two locations offered for the same proposal, so no options to apply a sequential approach to.

- We agree with 'particular protection attached to valued attractions', including the three examples given in the policy. But sometimes the countryside itself is part of the 'attraction'. Therefore, amend to 'particular protection attached to valued attractions and their settings'.

- Add a requirement for proposals to preserve and if possible enhance the rural landscape, biodiversity, heritage and tranquillity of the Borough. (Tranquillity is important eg. Pony trekking might preserve it, but go-cart racing probably wouldn't).

- Make explicit that cumulative effect will be taken into account (compliant with the Environmental Impact Assessment Regulations (2017), Schedule 3, para 1).

Definitions

Policy EN2. Biodiversity and Geodiversity

Policy EN2: Relevant context to respond to the questions below

Question 49: Looking at the options above, which option do you support?

Question 49 - Option 1: Delete the policy:
Strongly disagree

Question 49 - Option 2: Amend the policy:
Somewhat agree

Question 49 - Option 3: Split the policy:
Strongly agree

Question 50: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Option 1 would remove all MLP support in a vital policy area. Do not delete.

Option 2 would address the issues identified so would not be unacceptable.

Option 3 is preferred if, as suggested, it would make the policy/policies easier to draft and understand.

SUGGESTIONS:

- Insofar as existing wording/format might be retained, insert a space between point F) and the words 'Provided they do not harm…'

- Definitely point keep K.

- Remove the phrase 'Unless it can be demonstrated that there is no alternative site available…'. Applicants can always demonstrate that by saying there is no alternative site under their ownership or control. Delete this get-out clause.

- In point L, replace 'At a level equivalent…' with 'At a level exceeding…' (to achieve net gain).

- Where a biodiversity loss is being replaced or compensated for, there needs to be a sequential hierarchy - on site, then adjacent, then nearby, then

elsewhere. [We are uncertain whether the new Mitigation Hierarchy covers this].

- Include more protection and ambition for trees. They contribute to climate change mitigation. Somerby NDP policy ENV11 contains examples which passed examination, so would be sound in the Local Plan:

• If existing trees cannot be retained in a development, they shall be replaced at a ratio of at least 2:1.

• New trees to be planted in residential developments of 3 or more houses at 3 trees per dwelling, and in non-residential developments at 1 tree per 50 sqm. gross floor space.

• In both cases, new trees to be of species native to the Plan Area, and planted where they can reasonably be expected to grow to maturity.

- The connection between biodiversity and climate change is scientifically complicated. Do not attempt to bolt climate change onto biodiversity. Address them in separate policies.

Definitions

Policy EN3. The Melton Green Infrastructure Network

Policy EN3: Relevant context to respond to the questions below

Question 51: Looking at the options above, which option do you support?

Question 51 - Option 1: Delete the policy:
Strongly disagree

Question 51 - Option 2: Amend the policy [preferred option]:
Strongly agree

Question 52: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Option 1: Contrary to National and Local objectives. Do not delete.

Option 2: Preferred as updating and strengthening protections, rather than fundamentally changing the scope of the policy.

SUGGESTIONS:

- Wording could be shortened by careful editing, but do not remove any points in the existing policy. Effectiveness is more important than brevity.

- For example, Point 18 'Historic Parklands' might not be important everywhere but is particularly important in Somerby Parish.

- Similarly to Policy EN2, do not include a get-out clause for 'having considered alternative sites' or 'no other site available'. Applicants will simply say they have no alternative site available ie. Owned by them or under their control.

- Consider a re-survey of Tree Preservation Orders. Where they are 'area' TPOs crossed or adjoined by a PROW, they a fairly considered green infrastructure. They have become devalued in planning due to out-of-date surveys

Policy EN5. Local Green Spaces

Policy EN5: Relevant context to respond to the questions below

Question 53: Looking at the options above, which option do you support?

Question 53 - Option 1: Delete the policy:
Strongly disagree

Question 53 - Option 2: Incorporate Green Belt criteria:
Somewhat agree

Question 53 - Option 3: Designate additional Local Green Spaces:
Strongly agree

Question 54: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Option 1: Do not delete. NDPs can only designate Local Green Spaces when they are written or reviewed. Also, not all areas have a NDP but may nonetheless benefit from designation of Local Green Spaces. Do not delete.

Option 2: Incorporation of NPPF Green Belt Criteria is necessary to achieve NPPF compliance.

Option 3: Preferred. As Option 2 but with the opportunity to propose new Local Green Spaces.

Question 55: If you wish to propose a new area for Local Green Space, please send a map and supporting information to planningpolicy@melton.gov.uk and add a note in this section

Please, provide further context:

There are a number of sites we would like to propose as Local Green Spaces in SOmerby , Pickwell and possibly Burrough on the Hill. But we doubt our capacity to produce maps and evidence them by 7th January 2024. At this early time, we can only list the possibilities:

- Ridge and Furrow field and PROW D75, adjacent to Oakham Rd and Surgery Close, Somerby.

- Paddock adjacent to Owston Rd and Firdale, Somerby.

- The Rewilding Area, Church Lane, Somerby.

- South of Somerby, field and PROW D74 where adjacent to Somerby.

- The Cricket Field, Leesthorpe Rd, Pickwell.

Apologies for vagueness. We will provide full information when able.

Policy EN7. Open Space, Sport and Recreation

Policy EN7: Relevant context to respond to the questions below

Question 56: Looking at the options above, which option do you support?

Question 56 - Option 1: Delete the policy:
Strongly disagree

Question 56 - Option 2: Update the policy, particularly the standards [preferred option]:
Strongly agree

Question 57: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Option 1: Do not delete. More than 6000 new homes need more open space, existing spaces need protection to make this achievable.

Option 2: It is sound for the review to include new and best evidence.

- The typologies in the table in policy EN7 are more applicable to Melton Mowbray town than for rural villages. We ask for the 'new evidence soon to be available' to take into account the open space/sport/recreation needs of those villages. Naturally this would include spaces such as childrens' playgrounds and village greens, but also perhaps grazing land for equestrian purposes.

QUESTION:

Do the typologies and standards in ha/1000 population only apply to populations of 1000 or more, or do they scale down to villages with populations of less than 1000? We think they should, in order not to discriminate against the rural population.

Policy EN8. Climate Change

Policy EN8: Relevant context to respond to the questions below

Question 58: Looking at the options above, which option do you support?

Question 58 - Option 1: Delete the policy:
Strongly disagree

Question 58 - Option 2: Delete the policy, and make climate change a 'core thread' that runs throughout the entire plan:
Somewhat disagree

Question 58 - Option 3: Retain but update policy EN8 and make climate change a core thread that runs throughout the entire plan [preferred option]:
Strongly agree

Question 59: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Option 1: Do not delete. NPPF para 153 requires a proactive approach in this area.

Option 2: By all means consider Climate Change when reviewing policies, but reliance on a 'core thread' would be complicated, working the subject into any policies which bear on it (nearly all of them) one at a time. It would also lead to repetition.

Option 3: Preferred. Whatever MBC write on Climate Change, put it all in one policy. That policy must be clear what kinds of development it applies to (eg. size and Use Class). Parts of the policy would apply to 'all developments' but others would not.

SUGGESTIONS:

- Most climate change policy should not be 'subject to viability'. MBC have declared a Climate Emergency. If the only 'viable' proposal is harmful to the climate, it should be refused.

- In the opening paragraph of EN8 delete 'has been considered…' and replace with something like 'Take into account' or 'demonstrate how the need to mitigate climate change has influenced the design etc…' (Similar to the wording in existing policy EN9.) The word 'consider' means no more than thinking about it, so is not the right word in a declared emergency.

- We are uncertain what is meant by 'nature based solutions' but please consider our suggestions on tree planting and tree preservation under questions 49 and 52.

Policy EN9. Ensuring Energy Efficiency and Low Carbon Development

Policy EN9: Relevant context to respond to the questions below

Question 60: Looking at the options above, which option do you support?

Question 60 - Option 1: Delete the policy:
Strongly agree

Question 60 - Option 2: Refocus the policy and split it into new more specific policies as required [Preferred approach]:
Neither agree nor disagree

Question 60 - Option 3: Make the policy more robust and specific, to ensure all new development meets the highest standards:
Strongly disagree

Question 61: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Option 1(preferred): Much of this subject is covered by National standards. We doubt MBC can impose higher standards than those on a developer. Other parts (even including water management) could be transferred to other policies such as D1.

Option 2: A pragmatic approach, avoiding conflict with and/or duplication of building regulations. You say it is 'practical and deliverable' but it is also unambitious.

Option 3: We doubt this could be done. Firstly, the envisaged 'high specific standards' would have to be technically informed and expertly evidenced, which would be expensive. Secondly, we doubt MBC could impose standards higher than National standards, especially if 'subject to viability'.

SUGGESTIONS:

- Delete existing Point 6 (Home Offices) for new dwellings. We understand the advantages of home working, but applicants will use this policy to call one bedroom an office (they are already doing so) resulting in more larger homes than the MLP intends.

- Water Stress: Consider requiring new developments to include rainwater capture and grey water recycling. However, we don't know whether you can impose such a requirement.

Policy EN10. Energy Generation from Renewable and Low Carbon Sources

Policy EN10: Relevant context to respond to the questions below

Question 62: Looking at the options above, which option do you support?

Question 62 - Option 1: Delete the policy:
Strongly disagree

Question 62 - Option 2: Review the policy to ensure it works well for all types of renewable energy schemes [preferred approach]:
Somewhat agree

Question 63: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Option 1: Do not delete. We wish for MBC to take into account local opportunities and risks when making determinations on renewable/low carbon energy.

Option 2: Preferred, but with reservations:

- YES to alignment with National law, and covering types of energy generation not originally considered in the MLP.

- YES to 'pulling together' all policies on renewable energy generation in one policy, for clarity.

- Everyone benefits from energy generation, but large wind farms or solar farms are built in the countryside. Any negative impact is felt disproportionately by the rural population (such as we represent in Somerby Parish) and people who visit the countryside.

- Most important therefore is thorough environmental assessment eg. Landscape character, wildlife habitat, visual intrusion, heritage assets, noise, PROWs, tourism, amenity.

- The building of overground Electricity Transmission Line Towers (pylons) should not be supported. They can be harmfully visually impactive, a minimum of 36m high (more according to voltage) and extending for miles. Electricity should be carried underground. If Transmission Towers are contemplated at all, landscape sensitivity to them should be assessed similarly as for wind turbines in the 2014 Melton & Rushcliffe study (or whatever replaces it).

- We support solar panels on roofs but not the loss of agricultural land to large solar farms. Food security is surely even more important than energy security, and the UK already imports 48% of its food (and rising).

Policy EN11. Minimising the Risk of Flooding

Policy EN11: Relevant context to respond to the questions below

Question 64: Looking at the options above, which option do you support?

Question 64 - Option 1: Delete the policy:
Strongly disagree

Question 64 - Option 2: Add new elements of national policy:
Somewhat disagree

Question 64 - Option 3: Restrict policy to strategic overview and local matters:
Somewhat agree

Question 65: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Option 1: Do not delete. The LLFA are important but MBC are the responsible decision-makers. The LLFA point this out in their standing advice. A policy must state as a minimum that allocations will not be made, and proposals will not be approved, which increase flood risk elsewhere.

Option 2: We agree that to be sound the new policy must accord with the revised NPPF and NPPG, including the 3 'bullets' listed. But Option 2 fails to remove unnecessary detail.

Option 3 (Preferred): We agree the new policy must accord with the revised NPPF including the 3 'bullets' listed under Option 2. Why is only the first of these 3 bullets listed among the 5 bullets in Option 3? A mistake we think. There should be 7 bullets and they should all be in the new policy. Further:

- New policy must retain the opening sentence of the existing policy.

- New policy must be explicit that 'flood risk' means risk from any and all sources of flooding. We say this because:

- Necessary to align fully with Para 160 of the NPPF.
- The SHLAA site assessments for the existing MLP were deficient. They took into account only

Flood Zones, which means only flood risk from rivers and the sea.
- Case Officers tend to accept 'Flood Zone 1' as meaning low flood risk. It doesn't mean that, it means only low risk from rivers and the sea.

- Insofar as MBC intend to rely on documents such as the NPPG and SuDS manual, policy should state that proposals must comply with them.

- We advise against use of the word 'consider' in policy. The word 'consider' means no more than thinking carefully. As appropriate use more meaningful phrases such as 'take account of', 'incorporate' or 'put in place'. For example, the NPPF says proposals should have 'maintenance arrangements in place', but Option 2 says only that they should be 'considered'. We will oppose any policy wording which attempts to reduce NPPF requirements to MLP 'considerations', on the grounds it would be inconsistent with the NPPF.

Definitions

Policy EN12. Sustainable Drainage Systems

Policy EN12: Relevant context to respond to the questions below

Question 66: Looking at the options above, which option do you support?

Question 66 - Option 1: Delete the policy:
Strongly disagree

Question 66 - Option 2: Incorporate additional requirements:
Strongly agree

Question 67: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Option 1: Do not delete. A policy is necessary to apply the advice/guidance of the LLFA to planning decisions, which are made by MBC not the LLFA.

Option 2: Strongly supported, including the 3 'bullets' suggested, particularly the first one on long-term SuDS maintenance. Maintenance of drainage features designed to prevent flood risk elsewhere should become the responsibility of new residential homeowners. It doesn't work.

- Policy should clearly state that LLFA, SuDS Manual and Strategic Flood Risk Assessment guidance shall be followed.

- We have concerns in Somerby parish around groundwater protection, aquifers and pollution (including from residential developments - oil, fuel, cleaning agents etc.). These are mentioned in the existing policy but would like that paragraph strengthened to explicitly say proposals (especially Infiltration SuDS) must not increase risk of pollution to groundwater and/or aquifers. This becomes more important now the Borough is officially 'water stressed'.

- Existing policy is not excessively long and no part of it is unnecessary.

Policy IN1. Melton Mowbray Transport Strategy

Policy IN1: Relevant context to respond to the questions below

Question 68: Looking at the options above, which option do you support?

Question 68 - Option 1: Delete the policy:
Strongly disagree

Question 68 - Option 2: Reflect the latest position in the policy [preferred option]:
Strongly agree

Question 69: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Option 2 preferred as there has to be a policy if the transport strategy is to be applied to planning decisions.

Definitions

Policy IN2. Transport, Accessibility and Parking

Policy IN2: Relevant context to respond to the questions below

Question 70: Looking at the options above, which option do you support?

Question 70 - Option 1: Delete the policy:
Strongly disagree

Question 70 - Option 2: Amend policy wording to align with national and local guidance [preferred option]:
Strongly agree

Question 71: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Option 1: Do not delete. MBC would lose all influence in an important strategic area.

Option 2 (preferred): Alignment with the revised NPPF is necessary for soundness, and with Leicestershire Highways Design Guidance (LHDC) for consistency, and to 'signpost' requirements too lengthy and detailed to write directly into the policy.

SUGGESTIONS:

- The best way to ensure alignment with the LHDC is for policy to simply to say 'Proposals shall comply with the Leicestershire Highways Design Guidance (or any later document replacing it).

- However, compliance with the LHDG would be only one 'point' in the policy. We support retention of all of points 1-6 in the existing policy. Compliance with the LHDG would be an additional point.

- Requirements may vary locally. For example, need for parking spaces:
- It is fact that in the rural areas, reliance on the private car is high and likely to remain so,
especially for travel to work. Public transport Is being cut back.
- In 2017 we asked every resident of Somerby Parish how they usually travelled to work. Of
the 223 who responded, 219 (98%) said 'by car or van'.
- We further asked how far they regularly travel one-way for work, and the result was 26.5
miles.
As long as there is no public transport frequent enough for work purposes, rural residents are likely to use more cars than urban ones. That unfortunately means more parking space needed in residential developments.

- EV Charge Points: Provision should not be 'subject to viability'. New petrol cars are going to be
banned. Building without EV points is building in unsustainability.

Policy IN4. Broadband

Policy IN4: Relevant context to respond to the questions below

Question 72: Looking at the options above, which option do you support?

Question 72 - Option 1: Delete the policy:
Strongly disagree

Question 72 - Option 2: Amend policy [preferred option]:
Strongly agree

Question 73: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Option 2 (preferred) is realistic and practical, including all of bullets 1-4. It improves on the Building Regulations by including changes of use and non-residential use. This extension of the policy is proportionate to the increasing importance of high-speed broadband.

Definitions

Policy D1. Raising the Standard of Design

Policy D1: Relevant context to respond to the questions below

Question 74: Looking at the options above, which option do you support?

Question 74 - Option 1: Delete the policy:
Strongly disagree

Question 74 - Option 2: Review and strengthen policy so it sets out strategic principles for high quality new development [preferred option]:
Strongly agree

Question 75: Please use the comment box below to explain your response or provide any additional information you would like us to consider in our review of this policy

Please, provide further context:

Option 2 (preferred) as the policy must be aligned with revised PPF and National Design Guide. Presumably MBC would then proceed to write a Local Design Code on the back of the policy.

SUGGESTIONS:

- In the Somerby NDP our 'design code' is Appendix 8 – Design guidance. Our policy on design CD1 then says that proposals must 'demonstrate positive regard for the Design Guidance at Appendix 8'. MBC could take this approach, giving any Design Code policy weight without making the policy itself massively long.

- We strongly prefer the term 'demonstrate positive regard' to merely 'consider', which means no more than thinking about the Design Code, not necessarily applying it.

- In rural areas, Design Codes should include the surrounding wider landscape as a defining element.

- If (as expected) the revised policy references Design Codes, it should specifically reference Design Codes/Design Guidance in NDPs where one exists. Any such code would be in general conformity with the strategic MLP policy (otherwise it wouldn't have passed examination).

- Good idea to split the policy into 2-3 policies. We can see it is difficult to cover such diverse areas as climate change, layout of large developments, and detailed design of buildings in a single policy.

Question 76: Do you think the current design policy criteria covers all design issues adequately, that the current policy works well? Would you like to suggest any criteria to be added or removed from the policy?

Please, provide further context:

- Bio diversity net gain should be added (unless it is to be clearly required by another policy, such as EN2)

- We don't fully understand the criterion 'comprehensive'. We would say:

- Decisions should take account of the cumulative effect of 'piecemeal' proposals (to align policy with the Environmental Impact Assessment Regulations (2017), Schedule 3, para 1).

- If the intention is to prevent developers avoiding policies on affordable homes, housing mix etc. by building many 'small' developments incrementally, then we also agree.

- Well-designed 'infill' proposals should not be considered 'piecemeal' in a negative way.

Question 77: How important do you think each of the following design considerations are for a new development?

Question 77 - Attractiveness: creating a pleasant environment to live and work:
Very important

Question 77 - Sensitive to context: responds well to its surroundings:
Very important

Question 77 - Distinctiveness: builds upon the unique characteristics of its surroundings and creates a sense of place in itself (design features such as scale, massing, materials, landscaping and architectural detailing).:
Very important

Question 77 - Neighbour amenity: does not adversely affect neighbours and nearby uses:
Very important

Question 77 - Legible places: places that are easily understood by their users, particularly when moving around.:
Very important

Question 77 - Connectedness: created new and weaves into existing networks:
Quite important

Question 77 - Comprehensive: ensuring development is designed and delivered in a coordinated way, and avoiding piecemeal schemes:
Quite important

Question 77 - Safe and attractive streets and spaces: create spaces and environment that feels safe and secure to be in.:
Quite important

Question 77 - Environmental sustainability and adapting to climate change:
Very important

Question 77 - Mix of uses: the right range of uses and densities:
Neutral

Question 77 - Protecting and enhancing heritage assets:
Very important

Question 77 - Car parking:
Quite important

Question 77 - Community consultation: opportunities for community to get involved and help shape development proposals:
Very important

Question 77 - Other: please state below any other key deign considerations not highlighted above:
Very important

Please, provide further context:

• Delivers net gain for biodiversity.
• In rural areas, respects surrounding landscape character and tranquillity.
• Avoids or minimizes increase in noise levels, light pollution, dust, harmful emissions.

Question 78: Do you think there is a need for specific policy guidance about the use of design coding within the local plan?

Yes

Question 79: If you responded 'yes' to question 78, please provide reasons?

Please, provide further context:

A policy is required to give any Design Code weight in planning and determinations, because a Design Code itself is not a 'policy'. As we suggested under Question 75, the policy could require proposals to 'demonstrate positive regard for…' the Design Codes (including any Design Code in a NDP).

Equalities Impact

Question 80: Do you have any views on the potential impact of the proposals raised in this consultation on people with protected characteristics as defined in section 149 of the Equality Act 2010?

Unsure

Question 81: If you responded 'yes'/'unsure' to question 80, please provide your reasons and whether there is anything that you think could be done to mitigate any impacts identified

Please, provide further context:

According to Census 2011, Somerby Parish has an older demographic than the Borough, Region or England. Although only 17% were aged 65+ compared to 18% for the Borough, median age was 45 compared to 43 for the Borough, 40 for the Region and 39 for England.

The conclusion must be that people or 'working age' were older within the 16-64 age band than elsewhere. It can be assumed that a proportion of those are now 65+.
We also hear anecdotally that young people growing up in the Parish find it too expensive to stay here, and older people find it difficult to find properties to downsize into.

This is why we support strong policies on affordable homes and housing mix (eg. to proposals of 5 or more dwellings). We agree with bungalows continuing to feature in housing mix.

We are 'unsure' because we don't yet have Census 21 data down to Parish level.

Sustainability Appraisal Scoping Report

Please use the comment box below to provide any information you would like us to consider in relation to the Sustainability Appraisal Scoping Report

Please, provide a reference to the section and your comments:

The report is 171 pages long. We are unable to comment within the required timescale.