

Response ID ANON-MWX6-MJZJ-D

Submitted to Melton Local Plan Update: Issues and Options Consultation
Submitted on 2024-01-07 12:29:19

Introduction

Definitions

About you

What is your name?

Name:
Ian Long

What is your organisation? (if relevant)

Organisation:
Richborough

What is your Job Title/Role (if relevant)

Job title/role:
Divisional Planning Manager

What is your email address?

Email:
[REDACTED]

Are you making a submission on behalf of someone else?

Yes

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

Name (on behalf of):
Ian Long

Organisation (on behalf of):
Richborough & the Landowners

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:
[REDACTED]

Gender: How do you identify?

[REDACTED]

If self-describe, please state :

Would you describe yourself as transgender?

[REDACTED]

What is your sexual orientation?

[REDACTED]

If other, please state:

What is your age?

[REDACTED]

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:

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:

We would agree that it is imperative to review and consider what the most important and pertinent issues are for the Borough, however it is critical not to lose sight of the importance of enabling an appropriate quantum of development in the more sustainable settlements, including Melton Mowbray but also the defined Service Centres, which include Bottesford, reflective of the role that these settlements play. The sustainable growth of the Service Centres would serve to address several of the identified key issues to focus the Vision and Objectives on, as are defined in the 'preferred option' policy text, which we shall consider in turn:

- "Improving facilities for all of the community and providing the new infrastructure needed to support our growing population."

o Through sustainably growing the Service Centres, as well as Melton Mowbray, the viability and vitality of existing services and facilities across the Borough would be better protected and enhanced; whilst new/improved infrastructure to support the growing population would be more justified and deliverable.

- "Ensure local housing meets the local communities current and future needs."

o By diversifying housing growth more proportionally across the most sustainable settlements of the Borough, including to the Service Centres, and enshrining this as part of the Vision and Objectives that will underpin the emerging Local Plan, it is considered that this key issue will more fully and appropriately be encountered and planned for.

- "Supporting a diverse, competitive and innovative rural economy."

o Through planning for housing growth across the Borough, including in the more sustainable settlements in rural areas such as the defined Service Centres, cumulative and relating benefits would be experienced by the services and facilities that those settlements rely upon, thereby inherently supporting the rural economy.

It is considered that achieving Strategic Objectives 1 and 2, which relate to the provision of housing to meet the needs of the community (including affordable housing) and developing a housing stock to provide for the future aspirations for the local economy, will have cumulative and associated benefits for effectively all of the subsequent Strategic Objectives. This demonstrates the vital importance of ensuring housing growth can be achieved throughout the Borough, so as to support the viability and vitality of the most sustainable settlements and ensure that the objectively assessed housing needs are met in the emerging Local Plan Update.

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:
3

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

Question 3 - Ensure local housing meets the local communities current and future needs:
1

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:
2

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

Question 3 - Other (please specify below):

Please, provide further context:

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:

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]:
Somewhat agree

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:

It is considered that the Policy needs to be enhanced to better define meeting local need so as to better reflect the thrust of the NPPF (2023), which provides at Paragraph 61 that strategic policies should be informed by a local housing need assessment, conducted using the Standard Method as defined in national planning guidance.

In addition to this, Paragraph 82 of the NPPF provides that "in rural areas, planning policies and decisions should be responsive to local circumstances and support housing developments that reflect local needs"; whilst Paragraph 83 continues by stating that in order to "promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services".

This is of pertinence to the defined Service Centres, including Bottesford, as they fundamentally "act as a local focus for services and facilities in the rural area" of the Borough. As such, the ongoing viability of the services and facilities within those settlements are inherently linked to the proportionate delivery of housing growth, in locations which benefit from being in highly accessible locations which can be sensitively developed to account for landscape or ecological considerations.

This aspect is also of pertinence to the vitality of the settlements in the rural areas. The Sustainability Appraisal Scoping Report which accompanies the consultation document references the Melton Borough Council Housing Needs Study at Paragraph 10.3.11 by stating that "the greatest need for both market and affordable housing [in Melton] is for two- and three-bedroom houses and bungalows", thereby reflecting complexities in the affordability of the housing market in the Borough. It is critical that the matter of affordability and accessibility to the housing market is considered appropriately across the settlements of the Borough, including in the defined Service Centres such as Bottesford, to ensure that the economic viability and vitality of those settlements are preserved and enhanced for future generations.

A proportionate approach should be taken in considering the local housing needs of the settlements outside of the main urban area, to reflect the established 'Settlement Roles' hierarchy as provided in Table 4 of the adopted Local Plan

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:

It is considered that housing growth should be directed to the more sustainable settlements in the Borough, including Bottesford. No comment regarding the "smallest and least sustainable settlements".

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:

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:

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

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 policy
Please, provide further context

Please, provide further context:

Whilst it is acknowledged that the housing mix table used within the policy/reasoned justification should reflect updated evidence, it is considered that the amends to the policy proposed considerably heightens the risk of rendering sites either unviable or not able to be developed to their full potential, to the detriment of the aspiration to address certain key issues identified in the Vision and Objectives, and also to be in opposition to the overall thrust of the NPPF.

It is considered appropriate that the policy continues to make inclusion to exception clauses whereby the mix may differ from that prescribed in the policy, including the retention of the wording "having regard to market conditions and economic viability". The consultation document acknowledges the limitations and unintended consequences that removing such exception clauses may bring, and so it is considered that by simply removing the wording that this would not constitute sound plan making. It is considered that a more appropriate solution would be to include the policy mix within the wording of the policy, and thereby address the issues which arose in the noted appeal decision, but to retain reference to the exception clauses and associated wording, to allow genuinely justified departure from the policy mix where demonstrably necessary.

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:

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:

The aspiration to update the policy to incorporate NDSS as a requirement is acknowledged, however it is contended that the policy should be enhanced further by ensuring that proposals that would otherwise be rendered unviable by such a requirement are protected by a suitably worded exception clause. This could, in turn, be dealt with at the application stage by way of an appropriately and robustly evidenced viability assessment, thereby protecting the aspirations of the amended policy without unnecessarily endangering the supply of homes in order to meet the objectively assessed needs of the Borough.

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:

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

Somewhat 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:

It is acknowledged that the policy should be updated to reflect the NPPF and new evidence. As part of a review of the policy, which should be undertaken every five years as provided by the amended policy option wording, it is considered that the scope of this should be extended to review the minimum percentage of affordable housing for each of the value areas, as well as undertaking a review of the value areas themselves, to ensure that the policy constitutes sound plan-making utilising latest published evidence to justify how the different value areas have been defined and why they should provide the relevant minimum affordable housing percentages.

Definitions

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:

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

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

It is considered appropriate that the more technical aspects of the policy wording could be better contained in a supporting supplementary planning document, as well as the guidance and requirements as provided by national planning policy – such as the forthcoming National Development Management Policies; with the policy refocussed upon the overall strategic approach to planning for flooding with an emphasis on support for development proposals that are in Flood Zone 1.

As can be seen in the instances of Flood Zones 2 and 3 shown in the Fluvial Flood Risk in Melton Borough Map contained in the Sustainability Appraisal Scoping Report at Figure 4.3, managing flood risk is a highly pertinent issue for a number of the most sustainable settlements in the Borough, including Melton Mowbray and several of the Service Centres, including Bottesford. As such, it is contended that the policy should provide support for the development sites, either submitted by way of application or through a future Call for Sites, which are in Flood Zone 1, to encourage sites that are not negatively impacted by flooding to come forward for development, thereby reducing pressure upon the necessity for sites that are impacted by flooding to be relied upon in order to maintain an appropriate supply of housing land to meet the objectively assessed need.

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:

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

As is acknowledged by the wording under Option 2, the amends proposed to the policy should contain a suitably worded exception clause to remove or reduce the requirement for such proposed transport measures dependent upon a suitably and robustly evidenced viability assessment.

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:

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

It is acknowledged that the Policy should be updated to reflect the updated NPPF, it is also considered that the wording of the Policy amendment will ultimately be shaped by the forthcoming National Development Management Policies, as it will be necessary to avoid duplication and ensure that the policy can be applied effectively by applicants and in decision-making.

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:

The Policy includes sufficient criteria.

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:

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

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):

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

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

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

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

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

Question 77 - Environmental sustainability and adapting to climate change:

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

Question 77 - Protecting and enhancing heritage assets:

Question 77 - Car parking:

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

Question 77 - Other: please state below any other key design considerations not highlighted above:

Please, provide further context:

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

Not Answered

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

Please, provide further context: