

**Pre-Submission Draft Melton Local Plan
Regulation 19 Consultation
8th November 2016 to 19th December 2016**



December 2016

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1 EXECUTIVE SUMMARY

- i. This submission provides Gladman Development Limited's written representations on the Melton Borough Council Local Plan Pre Submission Version.
- ii. Gladman specialise in the promotion of strategic land for residential development, with associated community infrastructure, and has land interests in Melton Borough.
- iii. These representations concern the following matters:
 - Duty to Cooperate
 - Objectively Assessed Needs
 - Sustainability Appraisal
 - Housing Land Supply
 - Spatial Strategy and associated policies
 - Communities and associated policies
 - Environmental policies
 - Infrastructure
 - Design
- iv. Gladman question whether effective outcomes have been achieved through the Duty to Cooperate to ensure that Local Plans are in a position to effectively meet the housing and economic development needs of the Leicester and Leicestershire Housing Market Area over the period to 2036.
- v. The evidence of housing need on which the pre-submission version of the Local Plan has been drafted is out of date and the outcome of the Leicester & Leicestershire HEDNA is a key consideration for the formulation of this Local Plan. This should be supported by clear evidence to demonstrate the ability of the wider Housing Market Area to meet objectively assessed needs for housing and economic development.
- vi. Gladman have proposed a number of modifications to the Plan, which we believe are required for the Melton Borough Local Plan to be considered sound. This includes the need to create an unambiguous policy to tackle future housing needs in full through the allocation of a New Garden Village at Six Hills. The site is well located in relation to the wider HMA and the A46 (which is a key strategic road corridor through the borough).

2 INTRODUCTION

2.1.1 This submission provides Gladman Developments' written representations on the Pre-Submission Draft Melton Local Plan, which has been published for consultation from 8th November 2016 until 19th December 2016.

2.1.2 Gladman specialise in the promotion of strategic land for residential development with associated community infrastructure. Our representations concern the following matters:

- Duty to Cooperate
- Objectively Assessed Needs
- Sustainability Appraisal
- Housing Land Supply
- Spatial Strategy and associated policies
- Communities and associated policies
- Environmental policies
- Infrastructure
- Design

2.1.3 The Framework sets out four tests that must be met for Local Plans to be considered sound:

- **Positively Prepared** – The Plan should be prepared on a strategy which seeks to meet objectively assessed development and infrastructure requirements including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.
- **Justified** – the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on a proportionate evidence base.
- **Effective** – the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
- **Consistent with National Policy** – the plan should enable the delivery of sustainable development in accordance with the policies in the Framework

2.1.4 The Council will be familiar with the Planning Inspectorate's "Procedural Practice in the Examination of Local Plans", which provides useful guidance to local planning authorities on the examination of local plans. It sets out that the Plan that is published under Regulation 19 is the Plan that the Council intends to submit to the Secretary of State under Regulation 22. The Council should satisfy itself that the document is sound prior to undertaking its Regulation 19 consultation. There does however remain an opportunity for the Council to address any fundamental issues that might remain following the Regulation 19 consultation through the production of an addendum (including an updated sustainability appraisal where necessary). Any addendum would need to be the subject of a further round of public consultation by the Council prior to the submission of its Plan (together with any addendum) under Regulation 22. This approach can be effective in

enabling an efficient examination timetable and can significantly reduce the likelihood of further changes needing to be put forward by the Council as main modifications during the examination.

- 2.1.5 Due to the nature of several of the representations that we are making, it would be advisable for the Council to prepare an addendum to the Plan to address issues relating to its soundness and undertake an associated period of consultation. This course of action would be a positive approach that would hopefully then ensure smoother progression of the Local Plan through the examination process.
- 2.1.6 These representations focus on issues and concerns that relate to these tests of soundness and where possible make recommendations on how they can be overcome through main modifications to the Plan. These issues and concerns are summarised in Table 1 below:

Table 1 – Summary of policy soundness

Policy / issue	Sound/Unsound	Test of Soundness	Reason	Evidence
Vision and Objectives	Unsound	Positively Prepared Justified Consistent with National Policy	Whilst the Vision and Objectives in the main are reasonable, the Pre-Submission Draft Plan is predicated on early review to address as yet unquantified, but reasonably expected, unmet development needs from other authorities in the HMA. The Plan includes policies to address such a situation, yet, strategic housing issues within the HMA aren't even acknowledged as a Strategic Issue in the Plan. As a result, this has not influenced decision making through the SA and the assessment of large sites.	NPPF, Strategic Housing Market Assessment
Policy SS1	Sound	Positively Prepared Justified Effective Consistent with National Policy	This policy confirms the Council's commitment towards working proactively to improve the social, environmental and economic well-being of the area.	NPPF, PPG

Policy SS2	Unsound	Positively Prepared Justified Effective Consistent with National Policy	The Plan does not set out a housing requirement that reflects the Full OAN for housing and economic development and it fails to adequately provide for cross-boundary issues, such as unmet housing need from other authorities in the HMA. The Plan is based on evidence that the Leicester and Leicestershire local planning authorities have acknowledged as being out-of-date.	NPPF, PPG, SHMA, Leicester & Leicestershire Strategic Growth Statement 2016 HEDNA (pending) SHLAA/SHELAA (including those of neighbouring authorities)
Policy SS2	Unsound	Positively Prepared Justified Effective Consistent with National Policy	The policy seeks to arbitrarily restrict sustainable development opportunities from coming forward in service centres, rural hubs and rural settlements.	NPPF, PPG
Policy SS3	Unsound	Positively Prepared Justified Effective Consistent with National Policy	The policy seeks to arbitrarily restrict sustainable development opportunities from coming forward in service centres, rural hubs and rural settlements.	NPPF, PPG
Policy SS4 and Policy SS5	Comment	N/A	Support the allocation of the two Sustainable Neighbourhoods, but propose the allocation of a further sustainable strategic site: Six Hills Garden Village	NPPF, PPG, SHMA/HEDNA
Policy SS6	Unsound	Positively Prepared Justified Effective Consistent with National Policy	The introduction of a review mechanism is welcomed, however greater certainty is required to ensure that any future action provides certainty on the way in which the Plan is	NPPF, PPG, SHMA/HEDNA

			responding to meet future housing needs.	
Policy C2	Unsound	Positively Prepared Justified Effective Consistent with National Policy	The policy requires additional flexibility to ensure that the optimum housing mix can be brought forward on a site by site basis rather than restricting the mix in accordance with a strategic level evidence base.	NPPF, PPG, SHMA
Policy C3	Unsound	Positively Prepared Justified Effective Consistent with National Policy	The introduction of these standards should be fully justified through the viability evidence base.	NPPF, PPG, Viability evidence
Policy C4	Unsound	Positively Prepared Justified Effective Consistent with National Policy	The affordable housing need is based on out-of-date evidence in the absence of the new HEDNA. Further flexibility is required within the policy to ensure that affordable housing requirements can be considered on a site by site basis. Furthermore, the proposed site thresholds identified within the policy are now inconsistent with national policy.	NPPF, PPG, SHMA/HEDNA, Viability evidence
Policy C8	Unsound	Positively Prepared Justified Effective Consistent with National Policy	Self build and custom build housing requirements should be based on the identification of need. The policy requires additional flexibility to make it clear that the inclusion of land for development of this kind is encouraged rather than a requirement on large housing sites.	NPPF, PPG, SHMA/HEDNA, local evidence of need, Viability evidence
Policy C9	Unsound	Positively Prepared	The requirement for the production of	NPPF, PPG

		Justified Effective Consistent with National Policy	Health Impact Assessments to accompany planning applications is not consistent with national policy.	
Policy EN1	Unsound	Positively Prepared Justified Effective Consistent with National Policy	The Policy does not correctly reflect the emphasis of national policy in respect of the countryside. Additional flexibility is required to ensure that landscape issues to not unnecessarily restrict sustainable development from coming forward.	NPPF, PPG
Policy EN4	Unsound	Positively Prepared Justified Effective Consistent with National Policy	Any policy for the protection and enhancement of the environment should be established in light of the national policies contained in the Framework, particularly paragraphs 109 to 125.	
Policy EN5	Unsound	Positively Prepared Justified Effective Consistent with National Policy	Any policy for the protection and enhancement of the environment should be established in light of the national policies contained in the Framework, particularly paragraphs 109 to 125. Local Greenspace should be consistent with Paragraph 77 of the Framework.	
Policy EN6	Unsound	Positively Prepared Justified Effective Consistent with National Policy	Any policy for the protection and enhancement of the environment should be established in light of the national policies contained in the Framework, particularly paragraphs 109 to 125.	NPPF, PPG

Policy EN13	Unsound	Positively Prepared Justified Effective Consistent with National Policy	As currently drafted, the Policy does not correctly differentiate between designated and non-designated heritage assets.	
Policy IN3	Unsound	Positively Prepared Justified Effective Consistent with National Policy	Additional flexibility is required within the policy to ensure that the policy is not overly restrictive.	NPPF, PPG
Policy D1	Unsound	Positively Prepared Justified Effective Consistent with National Policy	Additional flexibility is required in the application of this design policy. Building for Life 12 is specifically referenced and the Plan should not seek to escalate this voluntary guidance into a requirement.	NPPF, PPG

3 LEGAL COMPLIANCE

3.1 Duty to Cooperate

- 3.1.1 The Duty to Cooperate is a legal requirement established through Section 33(A) of the Planning and Compulsory Purchase Act 2004, as amended by Section 110 of the Localism Act. It requires local authorities to engage constructively, actively and on an ongoing basis with neighbouring authorities on cross-boundary strategic issues throughout the process of Plan preparation. As demonstrated through the outcome of the 2012 Coventry Core Strategy Examination and the 2013 Mid Sussex Core Strategy Examination, if a Council fails to satisfactorily discharge its Duty to Cooperate, this cannot be rectified through modifications and an Inspector must recommend non-adoption of the Plan.
- 3.1.2 Whilst Gladman recognise that the duty to cooperate is a process of ongoing engagement and collaboration¹, as set out in the PPG it is clear that it is intended to produce effective policies on cross-boundary strategic matters. In this regard Melton Borough Council must be able to demonstrate that it has engaged and worked with its neighbouring authorities, alongside their existing joint working arrangements, to satisfactorily address cross boundary strategic issues, and the requirement to meet any unmet housing needs. This is not simply an issue of consultation but a question of effective cooperation.
- 3.1.3 The TCPA 2004 states at 110(1)(7) in relation to the Duty that the local authority has to have regard to any guidance given by the Secretary of State.
- 3.1.4 In this context, Paragraph 181 of the Framework sets out what is expected of local authorities when submitting local plans for examination, in order for them to evidence that they are planning strategically across local authority boundaries:

"Local planning authorities will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when their Local Plans are submitted for examination. This could be by way of plans or policies prepared as part of a joint committee, a memorandum of understanding or a jointly prepared strategy which is presented as evidence of an agreed position. Cooperation should be a continuous process of engagement from initial thinking through to implementation, resulting in a final position where plans are in place to provide the land and infrastructure necessary to support current and projected future levels of development." (Emphasis added)

- 3.1.5 In addition, the Planning Practice Guidance (PPG) goes on to explain²:

¹ PPG Reference ID: 9-011-2014036

² Planning Practice Guidance: ID: 9-001-20140306

“The duty to cooperate is not a duty to agree. But local planning authorities should make every effort to secure the necessary cooperation on strategic cross boundary matters before they submit their Local Plans for examination.”

- 3.1.6 Many local authorities across the country are currently working at a rate of knots to submit their Local Plans before March 2017 in order to retain control over their local plans. Whilst the importance of having local plans in place is acknowledged, it is vital that this is not at the expense of the proper planning for areas and communities. These representations highlight some of our concerns regarding the Pre-Submission Draft of the Plan, in particular regarding the absence of up-to-date evidence on housing needs across the HMA and how the anticipated needs of people and families living in the HMA may otherwise go unmet without practical solutions to such issues being secured through positive cooperation.
- 3.1.7 The need to positively plan to meet full housing needs across housing market areas should not be underestimated. It is all too easy for the duty to cooperate to be seen as an administrative exercise, however the fundamental social and economic need to ensure a supply of good quality housing to meet the homes and employment requirements across the wider area is a key issue that must be addressed properly through the plan making process. Whilst it may be the case that a local planning authority has sought to work positively with its neighbours, the extent to which a plan tackles strategic priorities that arise from the strategic cross-boundary evidence base are an issue to be considered in assessing the soundness of that plan. As a result, specific issues relating to the Leicester and Leicestershire HMA and Melton’s roles and responsibilities as part of an HMA partnership are highlighted in section 4 below.
- 3.1.8 In the light of the intimate and interconnected nature of the Leicestershire Authorities, there are significant cross-boundary issues facing the HMA. Gladman considers it is imperative that before submission **a final position** on key issues on matters such as Objectively Assessed Housing Needs are presented and resolved between the Authorities. In our opinion, failure to do this would not be consistent with the requirements of the Framework and therefore the requirements of the Duty to Cooperate. Indeed, as these representations will set out, the relevant evidence to provide for a satisfactory resolution on such matters has been instructed and prepared jointly by the authorities, so it does not seem unreasonable for those residing within the HMA to expect that those cross-boundary issues to be resolved such that the Plans being drafted are fit for purpose over the plan periods over which they are proposed.
- 3.1.9 In the case of Melton, there seems little sense in preparing a plan for a 25 year period if a review is required instantly upon adoption (currently anticipated in early 2018) to address these key issues.

3.2 Sustainability Appraisal

- 3.2.1 In accordance with Section 19 of the 2004 Planning and Compulsory Purchase Act, policies set out in Local Plans must be subject to Sustainability Appraisal (SA). Incorporating the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004, SA is a systematic process that should be undertaken at each stage of the Plan's preparation, assessing the effects of the Local Plan's proposals on sustainable development when judged against reasonable alternatives.
- 3.2.2 The Melton Local Plan should ensure that the results of the SA process clearly justify its policy choices. In meeting the development needs of the area, it should be clear from the results of the assessment why some policy options have been progressed and others have been rejected. Undertaking a comparative and equal assessment of each reasonable alternative, the Melton Local Plan's scoring and associated decision making should be robust, justified and transparent. The sustainability merits of all of the reasonable alternatives should be fully explored and tested in the context of their ability to achieve a sustainable form of development that fully support the economic, social and environmental objectives of the area. In the case of strategic sites, this should be considered through a robust exercise that assesses the sustainability of options, taking into account key strategic objectives (including those relating to economic, social and environmental prospects of the wider HMA). In this regard, Gladman are concerned that the objectives of the Plan do not fully reflect the Council's commitments to supporting the economic, social and environmental ambitions of the HMA over the plan period and beyond.
- 3.2.3 Gladman are concerned that the sustainability appraisal of the Six Hills Garden Village has not been considered from the context of the site's potential to be brought forward as a Garden Village. The ability for the site to be masterplanned and developed in a way that will ensure that the day to day needs of residents can be met in an attractive environment, where employment opportunities are made available are key potential benefits of the option that have not been fully considered. The ability for schemes of this nature to be made sustainable should have been taken into account through the SA and the process of identifying large sites for allocation through the 'Assessing Large Scale Development Site Options' document. Gladman have undertaken a separate assessment of the site using the format of those contained in the SA and the Large Scale Site Assessment (this can be seen in Appendix 2).

4 OBJECTIVELY ASSESSED HOUSING NEED

4.1 Background

- 4.1.1 The Leicester and Leicestershire SHMA (2014) is not up-to-date. This is a position that has been acknowledged by the authorities through the commissioning of a new study. It is therefore essential that the Housing and Economic Development Needs Assessment (HEDNA) is published as soon as possible and used to inform plan-making in Melton Borough. Upon completion of the HEDNA, it is essential that each of the local authorities carefully assess the ability to meet OAN over the period to 2036. Where there is unmet need identified in overall terms across the HMA, this must be addressed through the local plan making process. This position is explored further in section 4.2 below.
- 4.1.2 The process of undertaking an OAN is clearly set out in the Framework principally in §14, §47, §152 and §159 and should be undertaken in a systematic and transparent way to ensure that the plan is based on a robust evidence base.
- 4.1.3 The starting point for this assessment requires local planning authorities to have a clear understanding of housing needs in their area. This involves the preparation of a Strategic Housing Market Assessment (SHMA) working with neighbouring authorities where housing market areas cross administrative areas as detailed in §159 of the Framework. The Framework goes on to set out the factors that should be included in a SHMA including identifying

“the scale and mix of housing and the range of tenures that the local population is likely to need over the plan period which:

- ***Meets household and population projections taking account of migration and demographic change;***
- ***Addresses the need for all types of housing including affordable housing and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes); and***
- ***Caters for housing demand and the scale of housing supply necessary to meet this demand.”***

- 4.1.4 Key points that are worth noting from the above is that the objective assessment should identify the full need for housing **before** the Council consider undertaking any process of assessing the ability to deliver this figure. In addition, §159 specifically relates to catering for both housing need and housing demand within the authority area. It is worth pointing out that any assessment of housing need and demand within a SHMA must also consider the following factors; falling household formation rates, net inward migration, the need to address the under provision of housing from the previous local plan period, the results of the Census 2011, housing vacancy rates including the need to factor in a housing vacancy rate for churn in the housing market, economic

factors to ensure that the economic forecasts for an area are supported by sufficient housing to deliver economic growth, off-setting a falling working age population by providing enough housing to ensure retiring workers can be replaced by incoming residents, addressing affordability and delivering the full need for affordable housing in an area.

- 4.1.5 Of particular importance is the need to consider market signals. The consideration of market signals is one of the core planning principles considered in §17 of the Framework, which states:

‘..Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.’

- 4.1.6 Of critical importance is what the Framework goes on to say in §158 in the section discussing Plan Making. It states here:

‘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.’

- 4.1.7 Market signals are therefore at the very core of what the Framework is trying to achieve in promoting sustainable development and boosting the supply of housing land.

- 4.1.8 The formal publication of the Planning Practice Guidance in March 2014 gives further explanation to what the Framework means with regard to market signals, and sets out, in a range of paragraphs, the way in which local planning authorities should go about factoring in relevant market signals in arriving at their OAN. §19 and §20 of the PPG gives guidance on what market signals should be taken into account and how plan makers should respond to these market signals. The below extracts identify some particularly pertinent points.

‘The housing need number suggested by household projections (the starting point) should be adjusted to reflect appropriate market signals, as well as other market indicators of the balance between the demand for and supply of dwellings. Prices of rents rising faster than the national/local average may well indicate particular market undersupply relative to demand.’

- 4.1.9 The paragraph goes on to indicate that these factors would include, but should not be limited to, land prices, house prices, rents, affordability, rates of development and overcrowding. However, given what the Framework says at §17, quoted above, it seems clear that particular consideration should be given to affordability.

- 4.1.10 In order to consider how market signals should be taken forward §20 identifies some key concepts:

‘Appropriate comparisons of indicators should be made. This includes comparison with longer term trends (both in absolute levels and rates of change) in the: housing market area; similar demographic and economic areas; and nationally. A

worsening trend in any of these indicators will require upward adjustment to planned housing numbers compared to ones based solely on household projections.'

- 4.1.11 It is therefore clear that where market signals are apparent (in any of the indicators assessed) there is an absolute and clear direction that an upward adjustment to housing numbers is required. It is also clear that both the absolute level of change and the rates of change are considerations, and that local planning authorities need to carefully bench mark themselves against other areas. This should not simply be a case of considering neighbouring authorities but should look at, as well as these, local authorities on a national basis, if the demographic and economic indicators are relevant. Gladman are firmly of the view that considering comparisons purely against neighbouring authorities is not sufficiently robust and does not address the underlying issues which both the Framework and PPG are trying to tackle with regard to housing.
- 4.1.12 What is of further importance when considering these issues is the period of time analysed when considering both relative and absolute change. It has become apparent, in our consideration of a number of plans that many local authorities choose to look at periods of time which are not fully representative of the depth of the housing crisis which we are currently within.
- 4.1.13 The problems are noted in Fixing the Foundations: Creating a more prosperous nation published by HM Treasury in July 2015. In paragraph 9.7 the report states:

"There remains more to do. As the London School of Economics (LSE) Growth Commission found, 'under supply of housing, especially in high-growth areas of the country has pushed up house prices. The UK has been incapable of building enough homes to keep up with growing demand.'"

- 4.1.14 Gladman are therefore of the opinion that local planning authorities must take a long term view when considering affordability and consider the relative and absolute change over a long term 15-20 year period, which coincides with the normal time span of a Local Plan. Authorities should assess, as a constituent part of their OAN, how they can improve affordability over the life time of a plan to a point where affordability is more in line with average earnings and affordable mortgage lending rates. They should assess a level of housing over the 15-20 year plan period which would enable this step change and consider its deliverability in the plan. Only through planning for significant housing growth can local authorities realistically tackle market signals in the way advocated by the PPG and tackle the affordability and housing crisis.
- 4.1.15 The need to identify the full OAN before considering any issues with the ability of a Local Planning Authority to accommodate that level of development has been confirmed in the High Court. Most notably in *Solihull Metropolitan Borough Council v (1) Gallagher Homes Limited (2) Lioncourt Homes Limited* where it was considered that arriving at a housing requirement was a two stage process and that first the unconstrained OAN must be arrived at. In the judgement it was stated:

"The NPPF indeed effected a radical change. It consisted in the two-step approach which paragraph 47 enjoined. The previous policy's methodology was

essentially the striking of a balance. By contrast paragraph 47 required the OAN [objectively assessed need] to be made first, and to be given effect in the Local Plan save only to the extent that that would be inconsistent with other NPPF policies. [...] The two-step approach is by no means barren or technical. It means that housing need is clearly and cleanly ascertained. And as the judge said at paragraph 94, “[h]ere, numbers matter; because the larger the need, the more pressure will or might be applied to [impinge] on other inconsistent policies.”

4.1.16 Therefore following the exercise to identify the full, OAN for housing in an area,

“Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where adverse impacts are unavoidable, measures to mitigate the impact should be considered. Where adequate mitigation measures are not possible, compensatory measures may be appropriate.” (NPPF §152)

4.1.17 This statement clearly sets out that local planning authorities should seek to deliver the full OAN and that this should be tested through the evidence base. Only where the evidence shows that this is not achievable should they then test other options to see if any significant adverse impacts could be reduced or eliminated by pursuing these options. If this is not possible then they should test if the significant adverse impacts could be mitigated and where this is not possible, where compensatory measures may be appropriate.

4.1.18 The final stage of the process is outlined in §14 and involves a planning judgement as to whether, following all of the stages of the process outlined above,

“Local Plans should meet OAN, with sufficient flexibility to adapt to rapid change, unless:

- **any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this framework taken as a whole; or**
- **specific policies in this Framework indicate development should be restricted.”**

4.1.19 It is also worth noting that the final part of this sentence refers to footnote 9 of the Framework which sets out the types of policies that the Government consider to be restrictive. These include:

“sites protected under the Birds and Habitat Directive (see paragraph 119) and/or designated as Sites of Special Scientific Interest; land designated as Green

Belt, Local Green Space, an Area of Outstanding Natural Beauty, Heritage Coast or within a National Park (or the Broads Authority); designated heritage assets; and locations at risk of flooding or coastal erosion”.

- 4.1.20 Although this list is not exhaustive it is clear that local landscape designations, intrinsic value of the countryside, the character of areas, green gaps etc. are not specifically mentioned as constraints by the Framework.
- 4.1.21 The National Planning Practice Guidance (NPPG) contains guidance to support local authorities in objectively assessing and evidencing development needs for housing (both market and affordable) and economic development. This document supports and provides further guidance on the process of undertaking such assessments, in addition to what is set out in the Framework.

4.2 Leicester and Leicestershire HMA

- 4.2.1 Paragraph 14 of the Framework states that local plans should meet objectively assessed needs with sufficient flexibility to adapt to rapid change. The ‘Core Planning Principles’ set out at paragraph 17 also clearly outline that every effort should be made to objectively identify and then meet the housing, business and other development needs of an area. In addition, paragraph 158 of the Framework states that each Local Planning Authority (LPA) should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects for their area.
- 4.2.2 The current version of the Melton Local Plan has been progressed to the pre-submission consultation stage at a time when it is unable to comply with these fundamental provisions of the Framework and PPG. This is as a result of it being based on out-of-date evidence contained in the 2014 Leicester and Leicestershire Strategic Housing Market Assessment (SHMA), which utilises the 2012-based Subnational Population Projections and 2012 DCLG Household Projections. This is a critical failing of the Plan that must be fully addressed prior to Submission.
- 4.2.3 Melton Borough sits within the Leicester and Leicestershire Housing Market Area (HMA), which is heavily influenced by the City of Leicester. It is essential therefore that the relationship between Leicester City, Melton Borough and the other HMA authorities is carefully considered through the production of proportionate joint evidence and by successfully fulfilling the ‘Duty to Cooperate.’ Any discussions relating to the ‘Duty to Cooperate’ must be meaningful and result in positive plans that address strategic issues that exist and not defer finding solutions to a later date (which becomes an issue of soundness rather than one of legal compliance).
- 4.2.4 Whilst the Publication Draft Plan references a proposed Strategic Growth Plan, we are aware that evidence is in existence on housing needs for the HMA in the form of the HEDNA (the Housing and Economic Development Needs Assessment) on which decisions on strategic issues could be based. GL Hearn were instructed in February 2016 (over 10 months ago) and the work was previously expected to be published in September 2016. In the light of this up-to-date evidence being on the cusp of being completed, we consider there to be reasonable grounds on which to await the results of this work and agree practical solutions to housing issues in the HMA before the Plan is Submitted.

- 4.2.5 It is essential that the Melton Borough Plan is fully responsive to the progress being made on the Leicester City Local Plan and specifically, whether full objectively assessed development needs can be met within the City's boundaries. The City was not in a position to accommodate its own development needs on sites within its own administrative realms at the time of the Charnwood Local Plan examination some 2 years ago and the general consensus is that this position has not changed.. In the absence of a statutory cross boundary plan, it will fall on local planning authorities across the wider area to pro-actively support the process of identifying sufficient land to meet the HMAs full development needs through their individual local plans in a suitably coordinated manner. This will require careful coordination between the authorities and suitable mechanisms within each of their local plans to ensure that the individual authorities can take a timely and positive approach to important cross boundary matters and ensure that sustainable development opportunities can be planned for across local authority boundaries.
- 4.2.6 Based on the above, whilst there may be evidence of on-going collaboration between the authorities (through the Duty to Cooperate), which we wholly support, we are concerned that the Draft Publication plan is unsound by virtue of its inconsistency with the NPPF and PPG and that there is currently no evidence of a **final position** in the Plan to provide the land and infrastructure necessary to support development needs.
- 4.2.7 The recognition across Leicester and Leicestershire that the evidence base on which the Melton Borough Plan has been formulated is out-of-date confirms that the pre-submission document that is being consulted upon cannot be considered as being **Positively Prepared, Effective or Consistent with National Policy**. Gladman consider that the Melton Local Plan cannot be considered sound until the findings of the HEDNA are known and suitable policies are prepared that will positively respond to this new evidence base (taking the wider issues and objectives of HMA authorities into account). This will of course require joint working between the HMA partner authorities under the duty to cooperate, but also in terms of positive collaboration in the production of the proportionate evidence base and the drafting of objectives contained within individual local plans.
- 4.2.8 At the time of writing, the last Memorandum of Understanding to be tested at a Local Plan Examination in Public dates back to 2014 and was informed by a SHMA that was published that year. Within the MOU, the individual Leicester & Leicestershire HMA authorities committed to meeting their own OAN up to 2028. The ability of the authorities to meet up-to-date requirements to 2036 is highly uncertain and an updated position is urgently required.
- 4.2.9 It is worth noting at this stage that in advance of the North West Leicestershire Local Plan Examination in Public, Barton Willmore (BW) has undertaken a NPPF and PPG-compliant OAN assessment for the HMA on behalf of Gladman Developments. This has identified OAN between 4,126 and 4,674 dwellings per annum (dpa) for the HMA (2011-2031); a significant level of housing need every year that deserves full and proper attention when planning for the area over the next 20 years. We are awaiting their advice on the Melton-specific element of that OAN and reserve our right to submit evidence on this to the Council or Examination of the Local Plan in due course.

4.3 Leicester and Leicestershire Strategic Growth Statement 2016

- 4.3.1 In August 2016, The Leicester and Leicestershire authorities published a Strategic Growth Statement. This document made clear references (at paragraphs 5.3 to 5.5) to the work that all authorities across Leicester and Leicestershire are undertaking on a new HEDNA and also referenced the production of a new Memorandum of Understanding (MOU) between the authorities to replace the out-of-date MOU that was produced in 2014 on the basis of the 2014 SHMA. This exercise is expected to provide an understanding of how the development needs of the area will be planned for across the local plans of each of the local planning authorities within the HMA. It should demonstrate that the local authorities are cooperating, but also explain how each local plan will respond to shared strategic priorities and needs. It is highly uncertain that each constituent local authority will be in a position to accommodate its own development needs over the period to 2036.
- 4.3.2 The Strategic Growth Statement also introduced an HMA wide vision and set of objectives, which must now be fully reflected within the decision making that informs the Melton Local Plan (and other emerging plans within the HMA). These objectives include commitments: “to boost the speed of housing delivery”, “maximise the potential of our transportation corridors to deliver sustainable development”, “the integration of land use allocations, infrastructure improvements and genuinely mixed use, sustainable development which also encourages walking, cycling, the use of buses and other forms of public transport and working from home to reduce the need to travel”, “focus on place-making, creating real communities with a sense of place and purpose.”
- 4.3.3 In the context of the above paragraphs, Gladman are committed to working with Melton Borough Council (and where applicable the wider HMA Partners) to ensure that proposals are brought forward at Six Hills Garden Village that fully respond to the strategic objectives of the HMA (further details of Six Hills Garden Village are provided in section 5.6 below).

5 VISION AND STRATEGIC OBJECTIVES

5.1 Vision

- 5.1.1 Gladman considers the Plan Vision to be sound. We note that this specifically highlights in the first paragraph acknowledges the relationship of Melton and neighbouring towns and cities in Leicestershire and the desire to improve connections with those places. If this vision were to come to fruition, it would serve to enhance the intricate working relationships between the Leicestershire authorities and the people who live and work in the County.

5.2 Strategic Issues

- 5.2.1 The Strategic Issues for the Plan are set out in Section 3.2 on pages 18 and 19. Whilst Gladman consider the majority of Strategic Issues to be a fair account of the key considerations for the Plan; however, it is surprising that cross-boundary housing issues in the HMA and un-met needs from other authorities, such as Leicester are not contemplated.
- 5.2.2 As currently drafted, the Draft Plan makes specific contingency for this (in Policy SS6) and so in order for the Plan to be internally consistent it is considered that the Strategic Issues should be updated to reflect this.

5.3 Strategic Objectives

The Strategic Objectives of the Plan will flow from the Strategic Issues identified (3.3.2) and the very first objective identified on page 20 is to: “Help provide a stock of housing accommodation that meets the needs of the community, including the need for affordable housing.”

- 5.3.1 The second objective highlights the intricate relationship between housing and the economy, whereby the Plan will seek to ensure that a housing stock is provided for the future aspirations of the local economy.
- 5.3.2 It is a requirement of local plans to address the housing needs of the HMA. Gladman consider that it should be made clear that the “community” expressed in the first objective applies not only to residents arising within Melton, but those which may arise and otherwise go unmet within the HMA. As stated above in respect of the overall Vision, it is clear the plan is not being prepared in a vacuum and detailed consideration is later set out in policies of the Draft Plan to address this very issue.
- 5.3.3 If the second objective of the Plan is to be effective and the local economy (the functional area of which is illustrated well on the Key Diagram on page 22) is to prosper through links to neighbouring centres, taking account of migration and commuting patterns that are expected to manifest themselves, the commitment to addressing housing needs of other authorities if required must be made clear in the Plan.

6 GROWING MELTON BOROUGH – THE SPATIAL STRATEGY

6.1 Policy SS1 – Presumption in Favour of Sustainable Development

- 6.1.1 The policy sets out the positive approach that the Council will take that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It also sets out the commitment to work proactively with applicants to find solutions which will mean that proposals can be approved wherever possible, and to secure development that improves the social, economic and environmental conditions in the area. This approach is welcomed, but should be reflected in the remainder of the plan through a suite of positively framed policies.

6.2 Policy SS2 – Development Strategy

- 6.2.1 Policy SS2 of the Plan makes a commitment to *“make provision for the development of at least 6,125 homes and some 51 hectares of employment land between 2011 and 2036 in Melton Borough.”* The requirements contained in this policy are based on out-of-date evidence and should therefore be updated prior to the submission of the Local Plan to the Secretary of State under Regulation 22.
- 6.2.2 Gladman are broadly supportive of the proposed distribution of housing being directed towards Melton (65%) and the Service Centres and Rural Hubs (35%); however, we will later set out in these representations the proposal for a new Garden Village at Six Hills. This is situated on the very westernmost edge of Melton, adjacent to the A46 on the Boundary with Charnwood.
- 6.2.3 The site is strategically located between Melton Mowbray, Leicester, Loughborough and Nottingham and the proposal is specifically identified as a deliverable new settlement to address housing needs arising in the HMA and specifically those from Leicester.
- 6.2.4 It is considered that this development opportunity is best addressed through a dedicated allocation and policy and therefore, this would necessitate an increase in the housing requirement of the Plan.
- 6.2.5 The site has been promoted for some time and it is in the process of a detailed planning exercise to support this. The enclosed FPCR plan (Appendix 1, reference 7456-L-01 rev C) provides the most recent update to previous masterplans, highlighting a site which could develop up to 2,526 dwellings at 30 dwellings per hectare (up to 2,947 if an average density of 35 dph is applied), with 11.4 hectares of employment, a community centre, school facilities and significant areas of green space.
- 6.2.6 In the light of the above, Policy SS2 should be amended to state:

“Provision will be made for the development of at least 8,651 homes and some 62 hectares of employment land between 2011 and 2036 in Melton Borough.

Development will be distributed across the Borough in accordance with the spatial strategy set out below:

Melton Mowbray Main Urban Area is the priority location for growth and will accommodate 65% of the Borough's housing need. The role and sustainability of Melton Mowbray will be significantly enhanced through the delivery of at least 3,980 homes and up to 31 hectares of additional employment land by 2036. Development will be expected to contribute positively to the provision of key infrastructure, including traffic relief within the town, to support its growing population and economy.

A new garden village at Six Hills will accommodate a minimum of 2,526 dwellings and 11 hectares of employment land to address unmet housing needs arising within the HMA. The development will be expected to include facilities to provide for a range of day-to-day needs of the new community.

Service Centres and Rural Hubs will accommodate Service Centres and Rural Hubs will accommodate 35% of the remaining need (a minimum of 1822 dwellings)..."

- 6.2.7 Despite our support for the general approach taken in the plan, we do have some concerns with the remainder of the policy wording of SS2, as it could serve to unnecessarily restrict sustainable opportunities for growth in settlements that have been identified as being Service Centres, Rural Hubs or Rural Settlements. Whilst the broad commitment to grant planning permission for unallocated sites is generally welcomed, the policy should not arbitrarily limit the scale of development that can then come forward in those settlements. The introduction of artificial caps on development size cannot be justified and should as such be deleted or re-drafted to provide greater flexibility. In its current form, policy SS2 could be used to restrict schemes from progressing that are demonstrably sustainable. The Plan should provide flexibility to ensure that the sustainability credentials of all development opportunities that have not yet been identified can be assessed on their individual merits using criteria based development management policies.
- 6.2.8 Further weight is added to the above point through the Plan's recognition that it is unable to meet its own defined development requirements within several of the rural settlements (set out at paragraph 2.2.21 of the Plan). This adds to the case that policy SS2 is overly restrictive and would prevent the consideration of sustainable development opportunities on land that becomes available in those locations during the plan period.
- 6.2.9 In order to enhance the positivity of the Plan and provide flexibility, we would recommend the inclusion of wording within policy SS2 to indicate that:

"...Service Centres and Rural Hubs will accommodate Service Centres and Rural Hubs will accommodate 35% of the remaining need (a minimum of 1822 dwellings). This will be delivered by planning positively for the development of sites allocated within and adjoining the Service Centres and Rural Hubs by 2036, and by encouraging small scale development of 10 dwellings or less outside of the allocations in and adjoining

Service Centres, or 5 dwellings or less for the and rural hubs, where they enhance the sustainability of the community in accordance with policy SS3 – Sustainable communities.”

6.2.10 The section within SS2 entitled “*Small Scale Unallocated Development*” should be deleted in its entirety, as it repeats spatial strategy issues that are already set out in the preceding paragraphs within the policy. Further detail on unallocated development is also provided through Policy SS3 “Sustainable Communities (Unallocated Sites).” Please also note that specific comments on Policy SS3 are covered in section 6.3 below.

6.2.11 If Six Hills is not allocated within the plan, the Spatial Strategy should still seek to be inclusive of the Plan’s ambitions to consider the delivery of a new settlement. As such, we recommend that the following paragraph is amended within the final part of Policy SS2 to reduce conflict with other policies within the Plan:

“Open Countryside: ~~Outside the~~ Development that is not well related to settlements identified as Service Centres, and those villages identified as Rural Hubs and Rural Settlements, or as part of a sustainable new village proposal identified within the Local Plan, new development will be restricted to that which is necessary and appropriate in the countryside”

6.3 Policy SS3 – Sustainable Communities (unallocated sites)

- 6.3.1 As indicated within comments to policy SS2, Gladman support the intention to grant planning permission for development outside of the sites allocated through the Local Plan. It is however unclear why caps on the scale of development have been introduced. The relative sustainability of proposals can be assessed through the development management process using the criteria within policy SS3 in its current form without introducing an artificial cap on development size. Policy SS3 moves the Local Plan away from the positive approach that is required to be in line with the Presumption in Favour of Sustainable Development as set out by the NPPF and Policy SS1 of the Local Plan.
- 6.3.2 In order to overcome the issue identified above, Gladman would recommend that the opening section of Policy SS3 is re-drafted to read:

“Outside of those sites allocated through the local plan, planning permission will be granted for ~~small-scale development of up to~~

~~10 dwellings in Melton Mowbray and in Service Centres;~~

~~5 Dwellings in Rural Hubs; and~~

~~3 in ‘Rural Settlements’~~

where it has been demonstrated that the proposal enhances the sustainability of the settlement(s) to which it relates and, ~~through repeated application,~~ will not result in a level of distribution that is inconsistent with the development strategy. The Council expects proposals to meet the following criteria...”

6.4 Policy SS4 – South Melton Mowbray Sustainable Neighbourhood (Strategic Development Location) and Policy SS5 - Melton Mowbray North Sustainable Neighbourhood

- 6.4.1 Gladman supports the intention to allocate land for the development of sustainable neighbourhoods to the north and south of Melton Mowbray. This should however be complemented by the allocation of a further strategic site, ‘Six Hills Garden Village’, which has the ability to serve a wider market and in doing so support sustained housing delivery over the plan period (see sections 6.5 and 6.6 below)

6.5 Six Hills Garden Village

- 6.5.1 Presently the Six Hills Garden Village is recognised within Policy SS6, which provides for alternative development strategies and a Local Plan Review in the event that housing needs are identified arising within the HMA, which are not currently accounted for within the Plan.
- 6.5.2 Whilst this policy provides a contingency for addressing unmet needs in the HMA, this is not a new issue for the HMA authorities. Indeed, it was clear at the Charnwood Examination in public which

- contemplated the 2014 GL Hearn SHMA and evidence from the HMA that there was likely to be significant unmet development needs arising from Leicester.
- 6.5.3 The Six Hills Garden Village provides for a sustainable site to deliver much needed homes in a strategic location within easy reach of Leicester, Melton, Loughborough and Nottingham.
- 6.5.4 The current Policy SS6 proposes an early review, but this is not the optimum mechanism through which to resolve unmet housing need because of the length of time that can be taken to undertake such reviews. Indeed, the policy only commits to “commencing” a review, which is vague and provides little certainty that a review will be submitted at all. There are many examples of councils who have committed to early reviews (e.g. Staffordshire Moorlands) who have commenced a review but have done very little to progress the planning policies critical to addressing development needs in their area. Gladman are therefore concerned that this often defers the process of positively tackling significant issues facing the area today to an undefined future date.
- 6.5.5 To address the issues facing Melton Borough and the wider HMA in a positive, sustainable and upfront manner, Gladman request that the Council introduce a new policy into the Local Plan relating specifically to the allocation of the Six Hills Garden Village. The introduction of a positive plan-led approach to allocate Six Hills Garden Village through this Local Plan would act to set the parameters to enable the timely and sustained delivery of the garden village proposals together with accompanying community infrastructure.
- 6.5.6 Our representations in this respect should be considered in conjunction with our representations on the Strategic Vision and Objectives of the Plan and also Draft Policy SS2.
- 6.5.7 The Framework recognises that the supply of new homes can sometimes be best achieved through planning for new settlements that follow the principles of garden cities (NPPF, paragraph 52). This approach fits well in local authority areas like Melton Borough that are already focusing a significant level of growth on a single market town and have few other options to support them in meeting their objectively assessed housing needs and maintaining a rolling five year housing land supply beyond the release of modest extensions to rural settlements. This is especially true where options for sustainable new settlements exist in locations that are well connected to main urban centres within an HMA and where good opportunities to promote sustainable travel exist.
- 6.5.8 Over recent years there has been a move towards planning for new settlements based on the principles established through the Garden City movement as a solution to the ongoing housing crisis in England. Indeed, in February 2015, the publication of the ‘Garden Villages: Empowering Localism to solve the housing crisis’ sets out that “many small new ‘garden communities’ are needed (as well as some larger ones) if we are to scratch the surface of the housing problem in a locally responsive way reflecting the principles of localism.”
- 6.5.9 New settlements have the ability to reinforce and strengthen existing networks of market towns and rural villages through their strategic location, by providing new facilities to support existing communities. This approach will also maintain what is valued by rural communities in supporting the overall viability of existing infrastructure and in doing so providing a sustainable future for local

transport and community services. The concept of a network of settlements working together to meet the needs of the community is not a new one, the publication of 'Garden Cities of To-morrow' by Ebenezer Howard in 1898 first illustrated the concept of the garden city movement, therefore providing a new functional cluster in connection with nearby settlements is key to success in order to deliver new local infrastructure that will not only serve the proposed development but also the wider rural hinterland.

- 6.5.10 In making strategic allocations and drafting associated policies, the Council must fully consider the need to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable (as set out in Paragraph 17 'Core Planning Principles'). In this regard, all issues relating to the future sustainability of Six Hills Garden Village (including those many of those identified within the sustainability appraisal and large scale site assessment) have the ability to be suitably addressed through the introduction of appropriate planning policy requirements and through the development management process. The site provides a sustainable, viable and deliverable solution to support and maintain housing delivery over the plan-period, alongside the two proposed extensions to Melton Mowbray, due to its alternative location within the local market.
- 6.5.11 The site at Six Hills is free from any substantive environmental constraints, and due to the interaction of existing vegetation and topography, is not overlooked by any significant residential communities. It is strategically and spatially well located between established settlements, and does not impinge on the settings of any existing villages. It is very strongly defined by a triangle of roads, namely the Fosse Way (A46) to the west, Paddy's Lane (A6006) to the north east, and Six Hills Lane (B676) to the south east.
- 6.5.12 Established commercial and employment developments already lie at the north west and south west corners of the site. These existing areas, together with the creation of new employment opportunities in a 'Village Enterprise Centre' and the promotion of home working opportunities, will be highly beneficial as part of the development of a sustainable garden village.
- 6.5.13 The Local Plan provides an important opportunity to identify a scale and mix of uses that will assist in encouraging a sustainable development, minimising the need for travel further afield. Six Hills Garden Village has an opportunity to benefit from a number of existing bus services passing the site, providing sustainable travel to Melton and Loughborough. In addition, a strategic rapid service could be introduced between Six Hills and the Park and Ride facilities at Birstall, circa 12km away.
- 6.5.14 Details relating to the site can be seen in the emerging 'Six Hills Framework Masterplan (See Appendix 1). This provides the most recent concept plan for the proposal which is being prepared in conjunction with the Authority and Stakeholders. This is to be further refined through active engagement with the Borough Council.
- 6.5.15 Gladman are committed to working with the local planning authority to refine the parameters that are identified within the proposed Policy SS6 outlined below (to follow other strategic site policies). This is already being demonstrated through a process of formal pre-application discussions with

- Melton Borough Council. These discussions will provide the opportunity to focus on finalising requirements relating to issues including: ancillary services and facilities, green space and access arrangements.
- 6.5.16 An Environmental Impact Scoping Assessment is already underway and it is anticipated that a full complement of surveys and assessments for an Environmental Statement will be ready in time for the Local Plan examination. At present we are unaware of any significant effects which would preclude the development of this site. This is largely consistent with the findings of other documents (such as the Council's SHLAA, which concluded the site is deliverable and developable in the Plan period).
- 6.5.17 Our approach will ensure that a framework is brought forward for a truly sustainable garden village proposal, but also we consider it will provide the authorities and their partners key evidence on the deliverability of the site, which is so often absent from proposed site allocations of sites in Local Plans. .
- 6.5.18 Gladman have noted the content of the 'Assessing Large Scale Development Site Options' document and are concerned with a number of the conclusions that have been reached within it, particularly with regards to Six Hills Garden Village and its potential to support the plan in fulfilling its issues and objectives. An Alternative Assessment has been therefore prepared for consideration (see Appendix 2) as the conclusions reached by the Council on Six Hills Garden Village do not correctly reflect the positive potential of the site to support the strategic objectives of both Melton Borough and the wider HMA and Gladman request that this alternative assessment is taken into consideration through this plan-making process.
- 6.5.19 We therefore propose the following new policy:

Proposed Policy SS6 - Six Hills Garden Village

Melton Borough Council will work in partnership with developers and delivery partners to deliver a new Garden Village at Six Hills. The Garden Village will provide:

Housing

H1: a minimum of 2526 dwellings, 37% of which should be affordable (subject to viability).

Employment

EM1: up to 11.4ha of employment land (comprising uses in the B1 and B8 Use Classes) enabling the delivery of a Village Enterprise Centre

Community Facilities

C1: New school provision to serve the Village

C2: A centrally located local centre to serve the needs of residents of the development, including:

A: A1 (retail), A2 and A5 uses

B: GP Practice and Pharmacy

C: Community Park, including open space and formal sports provision

Transport

T1: A comprehensive package of transport improvements informed by an appropriate transport assessment including:

- A. Appropriate links to the strategic road network;**
- B. Measures to mitigate the impact of development on the existing transport network where adverse impacts are identified;**
- C. Public Transport provision to serve locations including Melton, Loughborough and Birstall Park and Ride / Leicester and associated travel plan for new residents.**
- D. Provision for walking and cycling as part of the proposed development.**
- E. Well-connected street patterns and walkable neighbourhoods providing high quality, safe and direct walking, cycling and public transport routes including links using the green infrastructure network;**

Environment

EN4: Provide a network of new high quality of multi-functional green spaces in accordance with the Council's open space standards set out in Policy EN7;

EN5. Provision, or facilitation, of sports pitches in the immediate vicinity, and contribute towards indoor built leisure facilities within Melton Borough, in accordance with the Playing Pitch Strategy and emerging Indoor Facilities Assessment (see Policy EN7);

EN6: A development that exceeds building regulations for energy efficiency and carbon emissions, where viable;

EN7: Buildings and spaces which are adaptable to future climatic conditions including extremes of temperature, drought and flooding;

EN8: Development that provides appropriate SuDS measures in accordance with the Strategic Flood Risk Assessment and;

EN9: Protection and enhancement of water quality.

Master Planning and Delivery

A master plan, including a phasing and delivery plan, should be prepared and agreed in advance of, or as part of, submission of a planning application for Six Hills Garden Village. In order to achieve a comprehensive approach, the master plan should be prepared for the

whole Garden Village. It will set out in detail the structure and development concepts of the Six Hills Garden Village, to include:

M1: The distribution and location of proposed land uses;

M2: Proposed key transport links, within and outside of the development, including those between the main housing and local centre, town centre and nearby employment uses, services & facilities;

M3: Areas of green infrastructure and green space (including important strategic green gaps to be protected);

M4: Areas of new landscaping; and

M5: Design that responds to the principles of garden cities

The Six Hills Garden Village Master Plan will be prepared in consultation with key stakeholders. Planning permission will not normally be granted for the Six Hills Garden Village until a comprehensive master plan has been completed to the satisfaction of the Local Planning Authority

6.6 Policy SS6 – Alternative Development Strategies and Local Plan

Review

- 6.6.1 As set out above, we consider a new policy and allocation to support the proposed Garden Village at Six Hills is justified. We note that Six Hills is already mentioned within Draft Policy SS6 and the very fact that the Council has included an alternative development strategy policy highlights the importance of significant unresolved housing issues within the HMA.
- 6.6.2 We consider this reiterates the importance of making clear in the Strategic Issues and Objectives of the Plan exactly why this is the case and how those policies will serve to address those key issues.
- 6.6.3 The Framework requires local planning authorities to create local plans that have sufficient flexibility to respond to rapid change and as a result, the inclusion of an appropriate mechanism will be vitally important. In order to be effective, this must provide certainty to those involved in the development process on how issues will be identified, the course(s) of action that will be taken and how this will be triggered.
- 6.6.4 Suitable flexibility is needed within the Plan to ensure that the local planning authority can take a pro-active approach to maintaining its housing land supply and ultimately meeting its OAN over the plan period. Indeed, actual delivery over a plan period often fails to match that envisaged by local planning authorities within their initial housing trajectories for a whole host of reasons and local plans provide the opportunity to clearly identify how any such risk will be handled.
- 6.6.5 As discussed earlier, the likelihood of an early change of circumstances is extremely high in Melton Borough. The pre-submission draft of the Plan is based on evidence of housing need that is already

significantly out of date and the Council committed some time ago (alongside its neighbours within the HMA) to prepare a new HEDNA. It is also notable that within the timescale of this Plan Leicester City Council will not be in a position to accommodate all of its future development needs without the assistance of the wider HMA authorities through the redistribution of a proportion of its requirement.

- 6.6.6 If a new Garden Village policy is not supported, then in order to be effective, the proposed Policy SS6 requires a clearer framework against which the alternative development strategy will be triggered. Importantly, the supporting text to the Policy at 4.7.6 – 4.7.7 sets out the clear imperative for this policy and the need to respond to strategic issues. Accordingly, the commitment to review the plan must be made unambiguous.
- 6.6.7 With the above in mind, it is considered necessary to strengthen the approach set out within Policy SS6 in order to provide certainty that these alternative courses of action will be brought forward in a timely manner. Gladman therefore recommend that Policy SS6 is re-drafted to read as follows and that it is accompanied by a new Policy SS7 to allocate the strategic site at Six Hills:

Policy SS6 – Alternative Strategy and Local Plan Review

Melton Borough Council is committed to meeting its requirements for housing, employment, other development and infrastructure. The Council will monitor the delivery of housing against the requirements in this Plan on an annual basis through its Authority Monitoring Report (published in August each year) to ensure a sufficient supply of housing land will be maintained to ensure the delivery of the requirement set out in Policy SS2 over the Plan Period.

In addition, the Council will continue to work positively with local planning authorities across the Leicester & Leicestershire Housing Market Area (HMA) to identify up-to-date development needs and support them in delivering a proportion of any unmet development needs that arise within the wider HMA.

Where monitoring identifies significant and persistent shortfalls in the delivery of housing and/or employment, infrastructure or spatial distribution that deviates significantly from the plan strategy, or there are changes within the HMA to the objectively assessed need for development or the spatial distribution of growth across the HMA, the Council will undertake an early review of the Local Plan or partial review. This will be submitted for examination within 12 months of new evidence being published and in order for this to be carried out quickly, the Council will prioritise consideration of the following potential alternative sites including:

- **The Six Hills Garden Village;**
- **Previously considered large scale site options at Normanton Airfield and Dalby Airfield;**

- **Sustainable sites within or adjacent to Service Centres, Rural Hubs and Rural Settlements**
- **Additional sites to the West of Melton Mowbray**

7 MELTON'S COMMUNITIES – STRONG, HEALTHY AND VIBRANT

7.1 Housing Land Supply

- 7.1.1 The Council must ensure that it is able to demonstrate a rolling five year housing land supply over the plan period in order to be compliant with the Framework to meet the fully needs of the Borough's communities and support the economic prospects of the wider area. In the absence of up-to-date evidence of housing need across the HMA, it is unclear at this stage whether this can be achieved. Gladman therefore reserve the right to give further consideration to the housing land supply position as new evidence is published by the Council and/or its HMA partners.
- 7.1.2 Gladman are of the view that the housing land supply calculation for Melton Borough should include a 20% buffer to take into account the previous persistent under-delivery of housing within the Borough. The Council should also plan to ensure that any shortfall against its need is made good within the first 5 years of the plan in line with NPPG (ID 3-035-20140306).
- 7.1.3 The housing land supply calculation and wider housing trajectory should be informed by up-to-date, clear and transparent evidence based assumptions relating to lead-in times and delivery rates for all relevant sites.

7.2 Policy C2 – Housing Mix

- 7.2.1 Gladman note the intention of the draft policy and would request that supporting text is provided to ensure that it is applied flexibly on a case by case basis. The SHMA can only ever provide an indication of housing mix for the wider area at a fixed point in time and should not be used to prescribe standards for individual sites coming forward over the whole of the plan period.

7.3 Policy C3 – National Space Standard and Smaller Dwellings

- 7.3.1 Gladman are concerned that policy C3 is not supported by sufficient evidence to justify the introduction of these standards. In order to be in line with the PPG (ID: 56-020), clear evidence is required to test the need, viability and impact on affordability that the introduction of these standards would have.

7.4 Policy C4 – Affordable Housing Provision

- 7.4.1 The affordable housing need within the Borough remains unclear in the absence of up-to-date evidence of housing need.
- 7.4.2 Further flexibility is required within the policy to ensure that affordable housing requirements can be considered on a site-by-site basis and are responsive to individual site circumstances. In addition, the proposed site thresholds are not consistent with national policy and should be reconsidered before the Local Plan is submitted for examination.

7.5 Policy C8 – Self Build and Custom Build Housing

- 7.5.1 The introduction of this policy should be informed by the Council's assessment of housing needs so that it appropriately reflects local circumstances in relation to the need and demand for self-build and custom build housing. In addition, any such requirements should be fully reflected in the Council's housing trajectory in terms of the impact that any delayed delivery of such plots may have on overall supply.
- 7.5.2 Gladman are concerned that the policy wording is not sufficiently responsive to circumstances that will arise on a site by site basis and request that this is addressed through modifications to ensure that housing delivery is not delayed in circumstances where there is no demonstrable demand for these products. In addition, we request that the policy and supporting text makes it clear that the Council is 'seeking to encourage' the inclusion of self-build and custom build on large housing sites rather than 'requiring it'.

7.6 Policy C9 – Healthy Communities

- 7.6.1 Whilst it is correct that the Framework seeks to support strong, vibrant, and healthy communities, there is no requirement for proposals to be accompanied by Health Impact Assessments. This requirement should therefore be deleted from the Policy. Where applicable, the sustainability credentials of a planning proposals should be addressed by the applicant through an accompanying Planning Statement and where necessary an Environmental Assessment.

8 MELTON BOROUGH'S ENVIRONMENT – PROTECTED AND ENHANCED

8.1 Policy EN1 – Landscape

- 8.1.1 Paragraph 17 (bullet five) of the Framework talks of “recognising the intrinsic beauty and character of the countryside” but also of “supporting thriving rural communities within it”. The Framework recognises that there will often need to be a loss of countryside if its wider objectives are to be achieved.
- 8.1.2 The Framework also seeks at paragraph 113 that Local planning authorities should set criteria based policies against which proposals for any development on or affecting landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status.
- 8.1.3 Policy EN1 acknowledges that Melton is unconstrained by national landscape designations, and the approach of the policy to set out criteria against which development shall be assessed is welcomed; however, the terms of the policy set an unnecessarily high bar considering the absence of landscape designations in the Borough. At present the Policy could readily be misinterpreted as seeking no harm at all, as it includes phrases such as, “proposals will be supported where they do not adversely affect important landscape features...”
- 8.1.4 It is rarely the case that development can occur without some adverse effect on landscape features (e.g. the removal of sections of hedgerow to allow for access). The test of the policy should therefore be that proposals shall be supported where they would not have an unacceptable adverse impact on important landscape features.
- 8.1.5 Similarly, the tests of the policy should be to seek enhancement of the countryside where possible. It is often the case that landscape mitigation can be provided, but achieving an enhancement is somewhat subjective and it is not always possible.
- 8.1.6 Finally, considering the absence of statutory and even non-statutory landscape designations in the Borough, the approach of the policy should be one of conservation (i.e. managing change positively), rather than one of protection, which can be misinterpreted as being entirely preclusive of new development.
- 8.1.7 For ease of reference Policy EN1 is reproduced with suggested changes below:

The character of Melton Borough's landscape and countryside will be enhanced and protected *conserved and, where possible, enhanced by:*

I. Ensuring new development is sensitive to its landscape setting and *that it seeks, where possible, to enhance the distinctive qualities of the landscape character type (as defined in the Landscape Character Assessment); and*

II. Requiring new developments to respect existing landscape character and features. Proposals will be supported where they do not *have an unacceptable adversely affect effect upon* important landscape features including:

- 1. Distinctive topography;**
- 2. Important trees, hedges and other vegetation features;**
- 3. Important ponds, watercourses & other water areas;**
- 4. Important views, approaches and settings.**

In addition, new developments will be supported where they:

5. Do not *have an unacceptable adversely affect effect upon* an area's sense of place and local distinctiveness; and

6. Do *have an unacceptable adversely affect effect upon* areas of tranquility, including those benefiting from dark skies, unless proposals can be adequately mitigated through the use of buffering..."

...Neighbourhood Plans will be encouraged to use evidence provided in the 'Areas of Separation, Settlement Fringe Sensitivity and Local Green Space Study' to inform site allocations and design guidance, to ensure that the Borough's landscape will be ~~enhanced and protected~~ *conserved and, where possible, enhanced*.

8.2 Policy EN4 – Areas of Separation, Policy EN5 – Local Green Space and Policy EN6 – Settlement Character

8.2.1 Gladman are concerned that the proposed policies are inconsistent with national policy.

8.2.2 There are likely to be circumstances over the plan period where sustainable proposals can be brought forward within the locations identified. It is therefore considered that it must be made clear that any such designations will be considered in the overall planning balance. Policies that may be used to represent a blanket approach to the restriction of development outside of defined settlements do not accord with the presumption in favour of sustainable development set out in paragraph 14 of the Framework. Any policy for the protection and enhancement of the environment should be established in light of the national policies contained in the Framework, particularly paragraphs 109 to 125.

8.2.3 Paragraph 77 of the Framework sets out the national policy position in relation to the designation of local green space. It states that a 'Local Green Space' designation will not be appropriate for most green areas or open space. The designation should only be used:

- "where the green space is in reasonably close proximity to the community it serves;

- Where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and
- Where the green area concerned is local in character and is not an extensive tract of land.”

8.2.4 The PPG provides additional guidance by stating:

“There are no hard and fast rules about how big a Local Green Space can be because places are different and a degree of judgement will inevitably be needed. However, paragraph 77 of the National Planning Policy Framework is clear that Local Green Space designation should only be used where the green area concerned is not an extensive tract of land. Consequently blanket designation of open countryside adjacent to settlements will not be appropriate. In particular, designation should not be proposed as a ‘back door’ way to try to achieve what would amount to a new area of Green Belt by another name.” (ID: 37-015-20140306)

8.2.5 The Council must ensure that any proposal (being made through this plan or a future neighbourhood plan within its administrative boundary) fully aligns with national policy and that there is a robust rationale for any such designations.

8.3 Policy EN13 – Heritage Assets

8.3.1 Section 12 of the Framework provides the basis on which local planning authorities should plan for the conservation and enhancement of the historic environment. Gladman consider Draft Policy EN13 to be largely consistent with the approach of the Framework; however, whilst the Framework seeks to implement an policy of conservation (i.e. the process of managing change which is consistent with a national policy statement that anticipates development), Policy EN13 seeks the protection of heritage assets which could be interpreted as precluding development in certain circumstances.

8.3.2 Since the introduction to the Policy states the approach of national guidance shall be adopted for the purposes of assessing harm, it should therefore also be consistent in the terminology it uses.

9 MANAGING THE DELIVERY OF THE MELTON LOCAL PLAN

9.1 Policy IN3: Broadband

- 9.1.1 Section 5 of the Framework relates to the role of local planning authorities in supporting high quality communications infrastructure. This sets out that it is the responsibility of the local planning authority in preparing Local Plans to support the expansion of electronic communications networks, including telecommunications and high speed broadband.
- 9.1.2 It is positive that the local planning authority are seeking to ensure that the borough is well served by broadband over the plan period and the county wide strategy is welcomed. Gladman are however of the view that this policy should be modified to ensure that sufficient flexibility is applied in the determination of planning applications on a case by case basis when considering the wider social, environmental and economic credentials of a proposal in the applying the planning balance. It is of course the case that the availability of high speed broadband should be considered to provide positive weight in favour of a proposal (where it enables economic development or home working for example), it should however be considered in the wider planning balance rather than being a 'must'.

10 MANAGING DEVELOPMENT

10.1 Policy D1 – Raising the Standard of Design

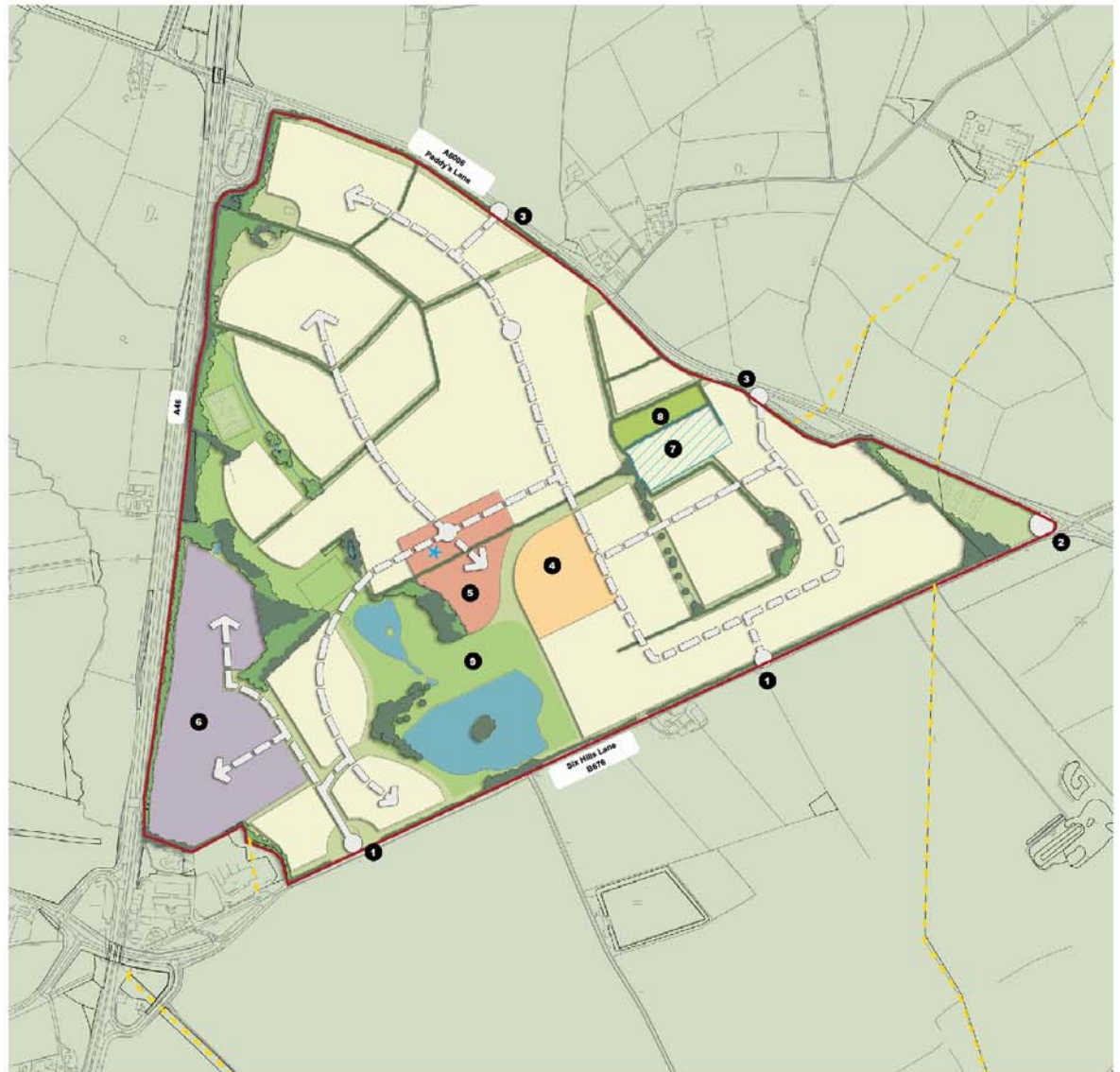
- 10.1.1 The policy introduces a requirement for development proposals to perform well against 'Building for Life 12'. Whilst this is a useful tool in providing guidance for development proposals, there may well be circumstances where this does not form the most practical approach to securing good design on a site. In addition, over the lifetime of the plan, other guidance is likely to emerge that replaces Building for Life 12.
- 10.1.2 Gladman request that modifications are made to Policy D1 to reflect the voluntary nature of the Building for Life 12 Design Guidance and the likelihood that this will be updated/superseded by alternative guidance during the plan period.

11 CONCLUSIONS

- 11.1.1 Gladman raise concerns that the Plan is not sound in relation to a range of matters, including: housing requirement; the ability to support the wider HMA in meeting its full development needs; and, a number of other policies that are overly restrictive.
- 11.1.2 Further work is also required through the Duty to Cooperate to ensure that the plan can demonstrably support the HMA in meeting its full housing and economic development needs over the plan period.
- 11.1.3 Gladman submit that the alternative delivery strategy contained within the plan should be made more explicit and thoroughly reflected through the Plan's issues, objectives and supporting evidence base. The sustainable option to support the delivery of Six Hills Garden Village should be brought forward through the Plan as an allocation to ensure that matters of strategic importance for the HMA are tackled up front and head on through positive plan making.
- 11.1.4 A number of issues have also be raised in relation to specific development management policies where they move away from the emphasis set out within the National Planning Policy Framework.
- 11.1.5 In light of the above issues, and the content of our submission, it is the conclusion of Gladman that in its current form, the Plan is contrary to national policy, not justified, effective or positively prepared and is as such unsound in a number of respects. These issues could be addressed through a number of main modifications to the Plan.

APPENDIX 1 – SIX HILLS GARDEN VILLAGE (PLAN)

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- | | | | |
|--|--|--|---|
| Application Boundary | Proposed Residential Area (84.21ha) Up to 2526 dwellings @ 30dph | Existing Ponds and Trees Retained | Proposed Woodland / Structural Planting |
| Proposed New Access Points off Six Hills Lane (B676) | Proposed School | Existing Hedgerows Retained within Green Corridors | Potential Allotments |
| Potential New Junction Arrangement | Proposed Local Centre (4ha) | Existing Woodland | Proposed "Six Hills Park" |
| Potential New Access Points off Paddy's Lane (A6006) | Employment (11.4ha) | Existing Lakes | Proposed Sports Fields |
| | Potential Future Development Parcel (2.0ha) | Indicative Public Transport Interchange | Proposed green corridors / green links |

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Gladman Developments Ltd
 Six Hills
 Leicestershire

INDICATIVE DEVELOPMENT CAPACITY PLAN

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 19 December 2016 HMBC
 7456-L-01 - C



APPENDIX 2 – SIX HILLS GARDEN VILLAGE ASSESSMENT

- Six Hills Garden Village - Large Scale Site Assessment
- Six Hills Garden Village - Sustainability Appraisal

Six Hills Garden Village Large Scale Site Assessment		
Issue / objective	Merits of options being assessed	Assessment summary
<u>Housing Priorities (HP)</u>		
<ul style="list-style-type: none"> HP1(i). Provide housing that meets the needs of the community. 	The area of the site is some 150 hectares and therefore able to deliver some 2,500 houses at a density of 30 / hectare.	Six Hills can accommodate a substantial amount of housing that would help to meet housing needs in a strategic location within the housing market area.
<ul style="list-style-type: none"> HP1(i). Help provide affordable housing 	The site would qualify for the provision of affordable housing and is of sufficient scale to provide some affordable housing without adversely affecting viability.	Six Hills could accommodate a substantial amount of affordable housing that would help to meet the requirements of the plan.
<ul style="list-style-type: none"> HP2. Develop a housing stock to provide for the future aspirations for the local economy. 	Six Hills provides the opportunity for employment in the rural area and is well located to enable access to employment by sustainable modes of transport	Six Hills will result in an increase in working age population. It will establish a new employment area in an attractive setting close to the strategic road network. The site is well located in relation to the established centres of Melton, Loughborough and Leicester (all within the Strategic Housing Market Area) can be served by sustainable modes of transport to each.
<u>Accessibility and Transport Priorities (ATP)</u>		
Strategic Objective	Merits of options being assessed	Assessment
<ul style="list-style-type: none"> ATP3. Reduce the need to travel by car and improve access to public transport 	<p>Six Hills Garden Village will be well served by public transport to Melton, Loughborough and Leicester (via Birstall Park and Ride). The site will include an employment hub and home working will be promoted.</p> <p>The site will follow the principles of garden cities and will therefore create an attractive and safe environment in which to walk and cycle.</p>	The site will be supported by public transport to important nodes within the housing market area and will be designed so that local residents can access day to day services (such as retail, primary school, employment opportunities and public transport stops) in an environment in which it is safe to walk and cycle.
<ul style="list-style-type: none"> ATP4. Reduce traffic congestion in Melton Mowbray 	Six Hills is situated on the western outskirts of Melton Borough and, whilst it will be within commutable distance to and from Melton Mowbray, it is expected the majority of new residents will choose to live there in order to be close to the City of Leicester and Loughborough. Therefore, no significant impacts are anticipated	Six Hills would focus growth in an location to address unmet needs from Leicester that would not exacerbate traffic congestion in that area.

Safety and Protection Priorities (SPP)		
Strategic Objective	Merits of options being assessed	Assessment
<ul style="list-style-type: none"> SPP5. To improve community safety and reduce crime and the fear of crime. 	There are no detailed design solutions proposed at this stage that would address issues of crime and fear of crime.	At this stage no assessment can be made regarding this objective. The ability to meet the objective depends on detailed design solutions. However, there are no constraints on-site that would prevent a detailed design solution that would address issues of crime and fear of crime.
Jobs and Prosperity Objectives (JPP)		
Strategic Objective	Merits of options being assessed	Assessment
<ul style="list-style-type: none"> JPP6. Enhance the vitality and viability of Melton Borough Mowbray town centre; 	Six Hills Garden Village is 8 miles from Melton Mowbray town centre.	Six Hills Garden Village is less likely to increase expenditure through use of existing shops, services and facilities in Melton Mowbray itself; however the purpose of a new Garden Village is to have some level of 'self-containment', which Six Hills will achieve through the provision of infrastructure such as shops, schools and other facilities. These will still undoubtedly benefit the Borough's economy.
<ul style="list-style-type: none"> JPP7. Provide sufficient land to meet current and future employment needs 	The area of the site is some 150 hectares and has the potential to accommodate some employment uses. However, this will depend on detailed design and there are significant concerns about the deliverability of transport infrastructure requirements needed to deliver the employment site.	Preliminary framework plans show that the Six Hills site could accommodate 11.4 ha of employment land. Improvements to the local highway and public transport network arising from the planning application process could serve to provide the appropriate transport infrastructure necessary to deliver this level of employment land.
<ul style="list-style-type: none"> JPP8. Help regenerate the rural economy 	Six Hills Garden Village is well related to the rural area. The site has some potential to encourage growth in rural employment. The ability of the proposals to contribute to this objective will depend on the detailed nature of the development.	The preliminary illustrative framework plans show that the Six Hills site could accommodate 11.4 ha of employment land and a 4ha local centre, which can greatly enhance rural spending, employment and the rural economy.
<ul style="list-style-type: none"> JPP9. Promote the tourism potential of the Borough through its food, equestrianism and heritage assets 	Six Hills SUE is well related to existing tourist facilities at Ragdale Hall.	Six Hills SUE could help to support tourist facilities in and around Ragdale and the wider Borough of Melton.
<ul style="list-style-type: none"> JPP10. Create a mixed economy with increased knowledge-based jobs and wages 	The illustrative Framework Plan provides for a mix of employment uses, including B1a office space. This could therefore have the potential to create some well-paid 'knowledge-	Preliminary framework plans show that the Six Hills site could accommodate 11.4 ha of employment land, this together with significant potential for home working would help foster the creation and

	based' jobs as part of a mixed use scheme, although it is acknowledged the location is more suited to light manufacturing and storage and distribution uses	maintenance of 'knowledge-based' jobs. The site is well located on the A46 between Melton Mowbray, Loughborough and the City of Leicester.
<ul style="list-style-type: none"> JPP11. Provide better training opportunities and increase educational attainment 	Six Hills Garden Village does not have direct access to education opportunities; however, the scale of development would allow for the creation of a new primary school and potentially a secondary school.	The scale of the new development would allow for new school facilities.
<u>Community Development Priorities (CDP)</u>		
Strategic Objective	Merits of options being assessed	Assessment
<ul style="list-style-type: none"> CDP12. Improve facilities for all the community 	The area of the site is some 150 hectares and could accommodate some around 2,500 new houses. The potential scale of population growth could place additional pressure on existing community facilities. However, the proposed Garden Village has much potential to provide new facilities on-site.	As a proposed new village, Six Hills will be able to accommodate a large number of new facilities on-site, including shops, employment, education facilities and healthcare facilities. This will have the ability to serve resident of the Village and also those in established rural communities in the general area. Improvements to or the expansion of existing community facilities in nearby centres is unlikely to be necessary, but could still be accommodated via S106/CIL contributions if deemed necessary.
<ul style="list-style-type: none"> CDP13. Improve access to services and facilities, including health, social care, jobs, recreation, sport and education, broadband 	Six Hills Garden Village has limited access to nearby services and facilities. The nearest existing education opportunities are in Old Dalby, which is also the nearest location for local sport & leisure, facilities. Other services and facilities are remote from the proposed Garden Village which does not have an existing community from which to grow. However, by virtue of being a proposed new village, such facilities can be provided on-site.	As a proposed new village, Six Hills will be able to accommodate a large number of new facilities on-site, including shops, employment, education facilities and healthcare facilities. Where some facilities are unable to be provided on-site, improvements to the local public transport network, or the utilisation of the existing well-connected road network, will ensure the absent facilities can be easily accessed at other nearby parts of the borough.
<ul style="list-style-type: none"> CDP14. Promote sustainable communities 	The area of the site is some 150 hectares and could accommodate some 2,500 new houses and therefore has potential to provide a mixed and balanced community providing for people of all ages, gender, ethnic and religious groups.	At 150 hectares and around 2,500 dwellings, the proposed new village would have the capacity to incorporate a local centre, employment area and school. This will serve the commercial, community, educational and employment needs of many of the residents.
<ul style="list-style-type: none"> CDPO15. Improve the health of the Borough and 	The area of the site is some 150 hectares and could accommodate some 2,500 new houses and	The Six Hills Garden Village will be of a scale that has the potential to provide additional health facilities on site. The

reduce health inequalities within the community	community facilities. The site could include both recreational facilities to encourage healthy living, as well as health care facilities.	design of developments could incorporate Green Infrastructure and open spaces that promote exercise. In addition, design solutions could ensure that the area is not adversely affected by pollution.
<u>Environment Objectives (EO)</u>		
Strategic Objective	Merits of options being assessed	Assessment
<ul style="list-style-type: none"> EP16. Promote high quality and innovative design which is visually attractive, reflects local context and distinctiveness, and, contributes to a safe and accessible environment to make places better for people 	There are no detailed design solutions proposed at this stage that demonstrate how to address this objective; however an illustrative Framework Masterplan has been produced which demonstrates the parameters within which a high quality new Garden Village could be designed. This includes utilising existing features, such as the existing lake to form a focal point for the development along with the provision of other significant areas of green infrastructure.	While at this stage no detailed assessment can be made regarding this objective in the absence of detailed design solutions, there are no constraints on-site that would prevent a high quality and innovative design being achieved when guided by suitable planning policy. Where appropriate, this could be linked to the principles of Garden Cities as set out in the NPPF.
<ul style="list-style-type: none"> EP17. Reduce pollution 	There are no Air Quality Management Areas that would result in adverse impacts on the proposed area of the proposed Garden Village by reason of pollution – although the A46 trunk road runs adjacent to the western boundary with the potential for noise disturbance and air pollution.	The Six Hills SUE lies outside of Air Quality Management Areas. While the precise mix of employment uses and their impact on pollution has not been determined, detailed design solutions have the potential to provide mitigation for any air quality or noise issues that may arise.
<ul style="list-style-type: none"> EP18. Protect and enhance the natural environment and biodiversity 	The Six Hills SUE does not contain any areas designated as a Local Wildlife Site or SSSI (protected because of their natural environment and biodiversity merits). However, the site is close to a SSSI to the immediate west of the A46.	While a full ecological assessment is awaited, preliminary assessments indicated the site is of local ecological value. Whilst the development of the site would result in the loss of some hedgerows to provide for access, the site is of a sufficient scale to incorporate net gains to the natural environment and biodiversity (to a greater extent than that arising from the golf course and agricultural land currently on site). In the light of the separation of the site from the SSSI, it is expected that any impacts will be indirect. It is possible to co-operate with Natural England to ensure any indirect impacts on the SSSI are mitigated.
<ul style="list-style-type: none"> EP19. Conserve the historic environment and 	The Six Hills SUE does not contain or immediately impact on any designated historic assets.	The Six Hills SUE does not contain or impact directly on any designated heritage assets

Melton Borough's heritage assets		
<ul style="list-style-type: none"> EP20. Protect the rural character of the Borough 	The Six Hills Garden Village, by virtue of being a new village, would result in an incursion into the countryside. Although the site is currently used as a golf course, it is largely devoid of buildings.	Six Hills Garden Village, by virtue of being a new village would be an isolated development in the countryside. Whilst it has the potential to have a significant detrimental impact on the rural character of the specific area. However, through the retention of existing landscape features, new planting and buffering, a design that respects the rural character of the borough can be readily achieved.
<ul style="list-style-type: none"> EP21. Protect and manage the use of natural resources and mitigate activities that cause their loss or degradation 	There are no areas of 'best and most versatile' agricultural land within the site. The extent of the loss or degradation of other natural resources will depend on the detailed design of the scheme.	There will inevitably be some loss or degradation of natural resources. However, there is potential to retain the most important resources such as water areas, minerals, agricultural land and woodland.
<ul style="list-style-type: none"> EP22. Prepare for, limit, and adapt to climate change and promote low carbon development 	There are no detailed design solutions at this stage that demonstrate how proposals could maximise the ability to limit climate change / adapt to the consequences of climate change.	While it is not possible to assess this objective until detailed design solutions are submitted which demonstrate how proposals could maximise the ability to limit climate change and adapt to the consequences of climate change, there are no known constraints preventing such solutions being incorporated at the detailed design stage and any impacts being fully mitigated.
<ul style="list-style-type: none"> EP23. Reduce the risk of flooding and avoid development in areas averse to flooding. 	The Six Hills SUE does not contain any areas that are likely to flood as a result of watercourses or surface water flooding.	The Six Hills SUE is outside of flood areas and no flooding issues are anticipated.
<ul style="list-style-type: none"> EP24. Minimise the use of energy and promote forms of renewable energy in the correct locations 	The proposal is of sufficient scale that it could allow some provision of renewable energy and could allow for small scale micro-generation.	While there are no detailed design solutions at this stage, the proposals could reasonably include small scale microgeneration.
<ul style="list-style-type: none"> EP25. Ensure that the reuse and recycling of waste is maximised 	The Six Hills SUE is of sufficient scale that it would allow measures to encourage re-use and recycling of waste.	While there are no detailed design solutions at this stage, the site could reasonably incorporate measures for re-use and recycling of waste.

Six Hills Sustainability Appraisal:

SA Objectives	Six Hills Garden Village
1. Housing	++
2. Education	0
3. Sustainable transport	+/-
4. Economy and employment	++
5. Landscape	-
6. Biodiversity and geodiversity	-
7. Cultural heritage	0
8. Efficient use of land and minerals	--?
9. Access to services	+/-
10. Social and economic inclusion	++
11. Crime	0
12. Waste	0
13. Economic Growth	+
14. Health	+/-
15. Greenhouse gases and air quality	+/-
16. Flood risk	-?
17. Water quality	0