

## PREVIOUSLY UNREPORTED REPRESENTATION TO PRE SUBMISSION CONSULTATION, NOV/DEC 2016

Representor Name	Policy/ Para.	Summary of Representation	MBC Response	MBC Suggested modifications /changes
Christopher Shatford (1)	4.2.5 and 4.2.7	Gaddesby village does not qualify for the Rural Hub status that it has been allocated, as it does not fulfill at least 3 of the 4 essential criteria. Gaddesby on this basis should be considered as a rural settlement only. In respect of the 4 essential criteria in application to Gaddesby.	The Review of the Settlement Roles and Relationships Report (May 2016) and approach to allocation contained within the CONSIDERATION OF SETTLEMENT ROLES AND RELATIONSHIPS (1st September 2016) reviewed the approach and identified that 4 key services would be applied to establish the 'category' of the village. These were selected to identify the factors which offered the greatest contribution to sustainability which in turn are those best placed to attract a share of housing. The capacity of villages to receive the allocations defined by this approach is based upon an individual assessment of the range of available and suitable sites. This approach is considered to be sound and Gaddesby is correctly identified as a rural hub owing to the presence of 3 of the key services identified. The proposed housing in Gaddesby and other villages represents the proposed approach to the provision and supply of the Borough's housing requirements overall. The HA has not objected to the increase in traffic associated with the growth in Gaddesby. The revised site assessments for Gaddesby are based on the most up to date information on school places and show a spare capacity of 20 at 2021 (the end of the forecasting period).	Amend Policy SS2 and the associated reasoned justification as a focussed change to reflect the housing allocation assessment in the light of new information and additional sites. This has the effect of reducing the allocation to Gaddesby to 36, for which permission already exists for 14 (net 22 )
Christopher Shatford (2)	4.2.4	My objection to paragraph 4.2.4 is that the change in classification between iterations of the Melton Plan is not clear and transparent, no clear reasoning is presented as to the re-classification of Gaddesby. The scoring is furthermore inconsistent at best, with similar villages being classified entirely differently.	As above	As above
Christopher Shatford (3)	4.2.15	The redistribution of housing due to lack of available sites in a number of other villages is unfair. The methodology of converting current population estimate to actual number of dwellings is also not clear and transparent; the assumptions made here need to be fully understood. This plan would increase the size of Gaddesby Village by 44%, without a corresponding increase in facilities or infrastructure.	Focussed Changes proposed a revised distribution eliminating the redistribution of unmet allocation from one village to the others. This results in a lower figure for Gaddesby of 36 (see proposed Focussed Change 1).	Amend Policy SS2 and the associated reasoned justification as a focussed change to reflect the housing allocation assessment in the light of new information and additional sites. This has the effect of reducing the allocation to Gaddesby to 36, for which permission already exists for 14 (net 22 ) 'Focussed Changes' proposed a revised distribution eliminating the redistribution of unmet allocation from one village to the others. This results in a lower figure for Gaddesby.

Christopher Shatford (4)	4.2.18	As some villages cannot deliver the required number of dwellings, other remaining villages will be taking a disproportionate share compared to others. The methodology of converting current population estimate to actual number of dwellings is also not clear and transparent; the assumptions made here need to be fully understood. The MLP allocations would increase the size of the village by 44%. This increase in housing is not matched by a corresponding increase in facilities and infrastructure.	The Council consider the approach appropriate. . It is based on available key facilities informed by the The Review of the Settlement Roles and Relationships Report (May 2016) and approach to allocation contained within the CONSIDERATION OF SETTLEMENT ROLES AND RELATIONSHIPS (1st September 2016) reviewed the approach and identified that 4 key services and the scale of allocation is based on population size. However Focussed Changes proposed a revised distribution eliminating the redistribution of unmet allocation form one village to the others. This results in a lower figure for Gaddesby.	As above
Christopher Shatford (5)	4.2.20	The methodology used by MBC to acquire residual targets sees an exclusion of 11 houses for Gaddesby, the difference between Tables 4 and 5 on page 32 of the Pre-Submission Draft Melton Local Plan. It is not clear what / where these 11 houses are.	Proposed Focussed Change 1 updates the commitments and completions in all settlements to produce a new 'residual requirement' which is 47 in the case of Gaddesby. The proposed revised allocations in Focussed Change 4 combine to a total of 36 of which 14 on GADD1 already have permission. 'Windfall' development under policy SS3 cannot be apportioned and proposals coming forward under this policy will be considered under the stated criteria, which include key sustainability considerations.	Amend Policy SS2 and the associated reasoned justification as a focussed change to reflect the housing allocation assessment in the light of new information and additional . sites. Amend policy SS3 to eliminate the strict size limits and to allow consideration of proposals to be considered on the key sustainability criteria. Amend Policy C1 to provide reduced site allocations for Gaddesby
Christopher Shatford (6)	4.2.13	The methodology for calculating windfall is flawed. Gaddesby will deliver greater number of windfalls than suggested (17 additional dwellings over the final 22 years of the MLP).	See above	As above
Christopher Shatford (7)	4.2.14	The methodology for calculating windfall is flawed. Gaddesby will deliver greater number of windfalls than suggested (17 additional dwellings over the final 22 years of the MLP).	As above, plus the 'windfall' allowance is guided by the criteria of Policy SS3 which differs significantly from previous approaches. The approach is considered appropriate because it requires developments to satisfy clear sustainability criteria. It is not considered possible to apportion the quantity that may arise for 'windfall' to Gaddesby as a proportion of the overall total because of the presence of many variable factors.	Amend policy SS3 to eliminate the strict size limits and to allow consideration of proposals to be considered on the key sustainability criteria (proposed Focussed Change 1).
Christopher Shatford (8)	SS2	It is my understanding that a housing needs survey / Strategic Housing Market Assessment (SHMA) for Gaddesby is due to be carried out by Melton Borough Council in early 2017. I do not believe that a housing allocation can be proposed for Gaddesby in the absence of a housing needs survey to inform it.	HEDNA has now been produced providing up to date evidence on housing needs and a housing requirement devised informed by its content and the related TAHR report, concluding that 245 d.pa. for the Borough was the most appropriate to secure the Local plan objectives. No amendment proposed, but HEDNA published alongside 'focussed changes' to allow comment on its content.	None proposed

Christopher Shatford (9)	5.4.6 (appx 1)	The housing allocation proposal for Gaddesby village has fundamentally failed to take account of required infrastructure and critical design and layout requirements, nor adequately planned for these, rendering the proposal unviable. Cites issues with highways, previous SHLAA assessments and public transport.	The Council consider the approach appropriate. . It is based on available key facilities informed by the The Review of the Settlement Roles and Relationships Report (May 2016) and approach to allocation contained within the CONSIDERATION OF SETTLEMENT ROLES AND RELATIONSHIPS (1st September 2016) reviewed the approach and identified that 4 key services and the scale of allocation is based on population size. The Highway Authority has been consulted at every stage of the production of the Plan and has not objected in respect of capacity or safety of the surrounding road network. Revised Site assessments have been carried out and as a result a revised allocation is proposed for Gaddesby which is set out in Focussed Change 4	Amend Policy C1 to present a revised allocation for Gaddesby (Focussed Change 4)
Christopher Shatford (10)	8.3.3	Travel options in Gaddesby are not sustainable and the need to travel by car would actually be increased with further housing allocation, in contradiction to the aims of SS2. Development cannot make the best use of existing resources and facilities, as these 'resources and facilities' simply do not exist in Gaddesby.	See above. The Plan has a strong focus of development in the location with greatest travel opportunities in that 65% is located in Melton Mowbray and much smaller quantities in locations where transport options are poorer, but which have a range of key facilities which mitigate the need to travel.	As above
Christopher Shatford (11)	8.3.6	Paragraph 8.3.6 states 'Locally identified key transport issues, which the Local Plan also seeks to address, are:...Poor public transport, with better bus and rail services required'. The Pre-Submission Draft Melton Local Plan is contradictory and inconsistent; it does not set out anywhere how this will be addressed for the village of Gaddesby.	See above	As above
Christopher Shatford (12)	IN1	Policy IN1 (Transport & Strategic Transport Infrastructure, p134) states 'Melton Borough Council and its delivery partners will support and promote an efficient and safe transport network which offers a range of transport choices for the movement of people and goods, reduces the need to travel by car and encourages use of alternative, such as walking, cycling and public transport'. The Pre-Submission Draft Melton Local Plan is contradictory and inconsistent, it does not set out anywhere how this will be addressed for the village of Gaddesby.	The policy seeks improved transport choices in all locations. However it requires updating in view of the progress towards the MMTS and Distributer Road in Melton Mowbray . Revised site assessments have provided greater detail on employment opportunities and identify several in close proximity to Gaddesby, including its proximity to Leicester and Melton.	Revise Policy IN1 and resound justification to reflect the up to date position in transport infrastructure (see Focussed Change 11). Revised site allocation in the light of update site assessments (Focussed Change 4)
Christopher Shatford (13)	6.9.3	In respect of employment growth, Paragraph 6.9.3 in the Pre-Submission Draft Melton Local Plan states that 'The Local Plan policy does not allocate specific sites in the rural areas'. The Pre-Submission Draft Melton Local Plan is not internally consistent in this respect i.e. a housing allocation is made, but without any respect	Revised site assessments have provided greater detail on employment opportunities and identify several in close proximity to Gaddesby, including its proximity to Leicester and Melton.	As above
Christopher Shatford (14)	EN1	Policy EN1 is inconsistent in its application to Gaddesby village, as the housing allocations GADD2 and GADD3 would directly contradict point 4 (p98) in particular.	The issues associated with GADD2 site are agreed in terms of settlement setting and it is proposed to delete 'GADD2' as a housing allocation. It is not considered that the issues associated with GADD2 site are agreed and it is proposed to delete 'GADD2' as a housing allocation. GADD 3 will impact on important views, approaches or settings.	Amend Policy C1 to present a revised allocation for Gaddesby (Focussed Change 4)

Christopher Shatford (15)	para 7.2.1	In respect of Biodiversity, Paragraph 7.2.1 of the Pre-Submission Draft Melton Local Plan states that 'The Local Plan seeks to maintain and improve the natural environment and ensure that development proposals minimise negative impacts on biodiversity and provide net gains where possible'. further information about the likely ecological impact of the development of GADD2 needs to be provided so a judgement about suitability of the site for development can be made.	The issues associated with GADD2 site are agreed and it is proposed to delete 'GADD2' as a housing allocation.	As above.
Christopher Shatford (16)	para 7.2.2	Paragraph 7.2.1 references an updated Biodiversity and Geo-diversity Study (2015, 2016) of the Borough. Paragraph 7.2.2 however, suggests the study only 'surveyed the suitable site options for development in and around Melton Mowbray and the ten largest villages' to identify where notable areas of significant habitat were present. The Pre-Submission Draft Melton Local Plan does not confirm which are the ten largest villages, though on the basis of 4.2.7 I would expect these to be Service Centres and not Rural Hubs. Gaddesby, as defined as a Rural Hub, would not be one of these ten largest villages. I fail to therefore see how a housing allocation can be proposed for Gaddesby, when the Council's Biodiversity and Geo-diversity Study has not even assessed the impact on the village. Paragraph 7.2.2 is inconsistent, misleading and flawed in its application to Gaddesby village.	See above.	As above
Christopher Shatford (17)	7.22.1	<p>A large part of the GADD2 site is subject to flooding. Regular walkers confirm that in wet weather most is subject to standing water. Concerned that if the site were built, surface run-off would likely cause Gaddesby Brook to flood. Whilst Appendix 1 (p25) proposes a site specific policy ensuring mitigation measures against flood risk are provided at GADD2, further investigation into surface water and foul drainage solutions is required before the Local Plan progresses any further, to ensure flooding and wildlife concerns (including effect on a Local Wildlife Area) can be satisfactorily mitigated without a knock on affect elsewhere nearby.</p> <p>The ground of GADD3 site is clay heavy retaining a lot of surface water and run-off from fields, already affecting a number of properties; any new development in the area will undoubtedly have a negative knock on effect on existing properties. The Local Plan does not refer to improving drainage for existing properties, to acknowledge the impact additional housing allocation would cause. This potential risk has not been properly assessed.</p> <p>Within the overall Local Plan housing allocations, there are more suitable lower risk areas than those put forward in Gaddesby; in this respect the housing allocations at GADD2 and GADD3 are at odds with Paragraph 7.22.1 of the local plan.</p>	See above re GADD2. There is no evidence that GADD3 cannot be effectively drained without causing adverse impact on adjacent properties.	As above

Christopher Shatford (18)	7.22.2	A large part of the GADD2 site is subject to flooding. In respect of the GADD3 site, the ground is clay heavy and as a result there is a lot of surface water retention and run-off from fields. Within the overall Pre-Submission Draft Melton Local Plan housing allocations, it is felt that there are more suitable lower risk areas than those put forward in Gaddesby; in this respect the housing allocations at GADD2 and GADD3 are at odds with Paragraph 7.22.1.	See above	As above
Christopher Shatford (19)	EN11	Policy EN11 (p125) states that 'Melton Borough Council will ensure that development proposals do not increase flood risk and will seek to reduce flood risk to others'. GADD2 & GADD3 have flood and drainage issues.	See above	As above
Christopher Shatford (20)	EN13	Policy EN13A (p129) states that Melton Borough Council will seek 'to ensure the protection and enhancement of Heritage Assets including non-designated heritage assets when considering proposals for development affecting their significance and setting. GADD2 should be deleted due to its effect on heritage issues.	The impact on heritage assets is considered to be significant and unacceptable and has attracted objection from Heritage England. Proposed Focussed Change to delete GADD 2	See above
Christopher Shatford (21)	8.5.3	Not only does the Pre-Submission Draft Melton Local Plan not make specific accommodation for new healthcare facilities linked to the housing increase, it does not acknowledge that there may actually be a reduction locally. Without taking in to full consideration the implications of the LLR STP, Melton Borough Council has failed in its Duty to Cooperate.	The relevant CCG and other Health Agencies have been consulted at all stages of the Plan and have not objected to the allocation of houses. However in certain locations they have advised that increased demand may result in capacity issues and that expansion may be required as a result, which can be achieved through conventional planning mechanisms (e.g. s106, CIL etc)	None proposed.
Christopher Shatford (22)	3.3.4	Numerous grounds of objection demonstrate that the Pre-Submission Draft Melton Local Plan in application to Gaddesby village, is consistent with the objectives of the Melton Borough Sustainable Communities Strategy, as set out in paragraph 3.3.2. Of the 9 objectives outlined, only number 8 (enable and support the provision of affordable housing) supports the proposed housing allocation at Gaddesby. On this basis I do not regard the Pre-Submission Draft Melton Local Plan in application to Gaddesby to be justified.	The Council consider the approach to housing allocations consistent with the objectives of the Plan, whilst recognising that not all such objectives are assisted by every housing allocation.	None proposed
Christopher Shatford (23)	3.3.4	Multiple grounds of objection demonstrate that the Pre-Submission Draft Melton Local Plan in application to Gaddesby village, is consistent with its own strategic objectives, as set out in paragraph 3.3.4. Of the 25 objectives outlined, few, if any, support the proposed housing allocation at Gaddesby.	As above.	None proposed