

Appendix: Leicestershire County Council Proposed Response to the Melton Local Plan Partial Review Regulation 19 Pre-Submission Consultation Draft

January 2025

<i>Any overarching comments</i>	Any changes to levels of housing provision following the new (December 2024) NPPF and new Government figures will need to take account of the effects of allocations on waste management provision and the provision of waste water treatment.
Chapter 1: Introduction	<p>Para 1.77 – it is requested that Healthy Place Making link is replaced with LCC webpage. The locally developed webpage https://resources.leicestershire.gov.uk/health-and-wellbeing has been developed to provide a resources for planners, developers and other interested parties to find information on how to create healthier places and provide guidance on health impact assessments. This is a useful webpage which can be used to assist in the development of places that consider health and wellbeing at the forefront of design and function.</p> <p>Public Health has worked closely with Melton Planning team on the wording for C9 and C10 and we are all fully agreed on the wording within this draft version.</p> <p>A HIA on Melton Local Plans will be provided to Melton in early February.</p> <p>In paragraphs 28 & 29 under the Neighbourhood Planning section it is inferred that some of the proposed changes will cause some of the existing Made Neighbourhood Plans to require an update, but no mention is made that neighbourhood planning groups will be informed about this by Melton Borough Council. Please can this commitment and reference be included.</p>
Chapter 2: Melton Borough Today – A Portrait	No comments.
Chapter 3: Vision for Melton Borough	No comments.
Chapter 4: Growing Melton Borough – The Spatial Strategy	<p>Effects of Sustainable Neighbourhood allocations on waste management provision also need consideration as part of the Plan.</p> <p>There is potential for increased use of Melton Recycling and Household Waste Site (RHWS) following the closure of Somerby RHWS in October 2024 and therefore any future housing development may continue to have an increased impact on the Melton RHWS site.</p> <p>LCC does not currently have plans to build further waste infrastructure in the county. It is not possible to know the future</p>

	<p>impact on capacity at the RHWS sites and considerations of future changes would always need to be taken into account. However, at the appropriate time there would be a subsequent need for LCC and the council to work effectively together to manage the future need for additional waste infrastructure. The council does have a long term ambition to build a new Melton RHWS. This as a stand alone project is not yet fully developed and there are no plans agreed, however as this scheme is developed, it will be assessed against the balance of available resources and included in the Capital Programme as appropriate.</p> <p><u>Policies SS3, SS4 and SS5</u> - It is suggested that EV charging points and infrastructure should be referenced within these three policies, perhaps in connection with policy IN2.</p>
Chapter 5: Melton’s Communities – Strong, Healthy and Vibrant	<p>There is potential for increased use of Melton RHWS following the closure of Somerby RHWS in October 2024 and therefore any future housing development may continue to have an increased impact on the Melton RHWS site.</p> <p>The County Council's recently adopted Local Transport Plan 4 Core Document reflects that transport has a wide-ranging effect on the lives of our local communities, including in respect of their health and wellbeing. Thus, the section of the Local Plan about Health and Wellbeing (paragraphs 172 to 177, page 62-63) is welcomed; but further discussions with the district council would be welcomed to seek to strengthen Policy C9 (page 64) to include the encouragement of walking, cycling and wheeling, and the creation of attractive pedestrian and cyclist routes linking to a range of economic, social and leisure facilities and services.</p>
Chapter 6: Melton’s Economy – Strong and Competitive	<p>In respect of the proposed new Policy EC1 (page 70), it’s again a rather disappointing retrograde step in comparison to equivalent adopted Policy EC1 and Policy EC4 (which has been merged with EC1 to form the new policy). Whereas the adopted policy criteria relating to proposals for employment of allocated and non-allocated sites encourages development to be located to be accessible by active and sustainable travel modes, the proposed Policy turns this on its head, i.e. accessible only appropriate to the location. The proposed policy should be re-drafted to be at least as ‘strong’ as the current adopted policy.</p> <p>Development Criteria for Main Town Centre Uses :</p> <p>ix – Consider including a requirement for the incorporation of SuDS into green infrastructure (“blue-green infrastructure”). This could include tree pits (trees with a storage tank underneath) and small bioretention areas. These features mitigate the risk of flash surface water flooding, provide treatment to road runoff and provide amenity and temperature cooling benefits.</p>

	<p>Town centres can be highly susceptible to flash flooding due to the generally higher amount impermeable surfacing and often old drainage infrastructure. Providing SuDS features slows the rate at which surface water enters the underground drainage network, providing mitigation against the risk of surface water flooding to town centre businesses which is economically damaging.</p>
<p>Chapter 7: Melton Borough's Environment - Protected and Enhanced</p>	<p>We welcome the Designing with Nature policy (EN2B) and GBI policy EN3. This is an opportunity to incorporate reference to Mineral site restoration. Welcome the use of the waste hierarchy in Policy EN9A. We welcome incorporation of circular economy principles within the Plan.</p> <p>Good that reference is made to the LNRS.</p> <p>Reference could be made to the strengthened Biodiversity Duty introduced by the Environment Act 2021, which requires among other things public bodies to protect and enhance biodiversity (through their polices, functions and services etc)</p> <p>Though much of the content in this chapter is likely to show evidence of meeting the duty it may be useful to actually reference it.</p> <p>Feel that the references to action on climate adaptation are possibly not strong/detailed/sufficient enough to deal with the expected impacts of climate change.</p> <p><u>Policy EN2B – Designing with Nature</u></p> <p>It is suggested that the policy request planting be resilient to the effects of climate change (most importantly hotter summers). This requirement could be echoed across policies in which landscaping and planting is mentioned.</p> <p><u>Policy EN8 – Climate Change</u></p> <p>The policy reads like a 'menu' from which developers can pick out what they are doing anyway to justify compliance. It is suggested that the policy is trying to do too much, especially since many of the listed items are addressed in greater detail in other policies. It is recommended that the format and goal of the policy be reconsidered. In its current form it is not felt that the policy will encourage or enforce additional action to mitigate or adapt to climate change.</p> <p><u>Policy EN9A – Ensuring Sustainable Development</u></p> <p>The strength of this policy is noted. For residential developments, it could be made stronger by specifying an energy use intensity (EUI) target, especially for space heating (e.g. 15 kWh/m²/yr) as this would ensure a concrete target as well as ensure running costs are kept down to mitigate higher costs of electrically driven heating. For non-residential developments the same is suggested – set an EUI target</p>

for all systems or at least for space heating. BREEAM, although holistic, does not materially decrease a building's carbon emissions so it is suggested that this be replaced with the new UK Net Zero Carbon Buildings Standard. For large scale residential schemes, the requirement for a whole life carbon assessment is applauded but it is suggested that the policy stipulate which life cycle stages of EN 15978 should be included and maybe provide an appropriate target in kgCO₂e/m².

For residential and non-residential developments, it is suggested that a requirement for electric car charging be added to reinforce EN8 and IN2.

Policy EN9B – Water Efficient Development

For non-residential development, it is suggested that the target for five credits out of five for WAT01 may be too onerous. Unless MBC know this can consistently be achieved without relying on greywater recycling then it is suggested to perhaps drop the target to three or four credits.

Policy EN2 – The revised wording has removed 'point D' entirely:

“re-naturalise rivers and streams wherever possible through the removal of hard engineering structures such as reinforced banks, weirs and culverts.”

From a policy perspective, a statement in a local plan relating to the need to de-culvert through development is often the LLFA's only tool for forcing a developer to undertake such action.

It is noted that the wording has been written in a more generalised way within the new 'point L'. Please consider being more explicit with regards to the removal of culverts or hard engineered structures.

The removal of historic culverts offers several benefits. Culverts speed up the flow of water, increasing flood risk downstream. Blockages or restrictions are hidden from view. An open waterbody or channel has amenity, biodiversity and geomorphology benefits.

The inclusion of Point K is welcomed.

Policy EN11 – point D – “manage remaining risks including warning procedures and escape routes.”

Escape is not always the best option. Seeking safe refuge is often the procedure during a flood emergency. Escape routes are also access routes for emergency services during a flood event. Consider re-wording? Not essential, just an observation.

	<p>Statement doesn't make sense – "Its recommendations and relevant ones from the Strategic Flood Risk Assessment..."</p> <p>EN11 is a lot more readable and concise compared to the 2018 version which repeated a lot of NPPF.</p> <p>EN12 states that "Greenfield sites should achieve undeveloped greenfield runoff rates or better."</p> <p>It would be reasonable to remove reference to greenfield, because the LLFA request greenfield runoff rates for all development sites (including brownfield). Where there are reasonable grounds, we offer some flexibility for brownfield sites, but most brownfield sites achieve greenfield rates.</p> <p>For greenfield sites, they MUST achieve undeveloped greenfield runoff rates or lower otherwise development would not comply with NPPF. This is in line with the Non-statutory technical standards for sustainable drainage systems March 2015.</p> <p>The Non-statutory technical standard also requires discharge volumes to be at greenfield levels – however in many instances this is not achievable. In such cases, the discharge rate should be at a further reduced rate (typically Qbar) in order to mitigate any impact the increase in volume may have.</p> <p>Change the word 'better' to lower or less.</p> <p>Harborough District Council have recently taken a pro-active approach in their recent draft Local Plan by requiring development to reduce runoff rates by least 20% on existing conditions. This supports the NPPF requirement to "where possible, reduce flood risk overall" (Paragraph 178). Please consider including this policy requirement in Melton. This is a requirement of Coventry City Council too.</p>
<p>Chapter 8: Managing the Delivery of the Melton Local Plan</p>	<p>With regard to the 'Waste' heading on page 147 – we welcome the clarification that the 'Waste' section remains unchanged from the previous adopted (2018) Local Plan. It should be noted however that this text does need updating as rather than the Pre-Submission Draft Minerals and Waste Local Plan 2016 reference can now be made to the adopted Leicestershire Minerals and Waste Local Plan (LMWLP, September 2019).</p> <p>Page 147 of the draft plan - <i>Waste [This section remains unchanged, please read the relevant section in the 2018 adopted Local Plan for further context]</i>. Note that the link to the adopted 2018 plan references the out of date 2016 pre-submission draft minerals and waste local plan.</p> <p><u>Policy IN2 – Transport, Accessibility and Parking</u></p>

	<p>Suggest inclusion of designing to LTN 1/20 as a requirement into the policy under point (c).</p> <p>No in principle issues from a transport perspective regarding proposed Policy IN2 (page 145), but some points of detail: (NB: lettering is as per the proposed Policy)</p> <p>b) It would be beneficial to also include reference to ‘transport measures’, as this can embrace revenue funded measures, e.g. cycle training and active and sustainable travel promotion (i.e. wider than might be covered by a site-specific travel plan).</p> <p>d) Suggest that this is amended to reference the provision of a Transport Assessment or Transport Statement in accordance with the Leicestershire Highway Design Guide (or similar subsequent document).</p> <p>e) It would be preferable to use the term ‘passenger transport’, which can embrace a wider range of services including not just ‘bus’ but also digital demand responsive services (DDRT) and those operated by voluntary groups.</p> <p>Inclusion of references to the County Council’s LTP4 are welcomed. But the vision on page 139 in paragraph 442 requires updating to reflect the LTP4 Core Document as approved by the County Council’s Cabinet in November 2024.</p> <p>‘Delivering a safe, connected and integrated transport network whilst is resilient and well managed to support the ambitions and health of our growing communities, safeguards the environment whilst delivering economic prosperity.’</p> <p>The core policies on page 140 likewise require updating to reflect the approved LTP4 Core Document.</p> <p>Core Policy 1: delivering the vision ‘Ensure that all our transport solutions accord with the five core themes to deliver our vision for transport with regard to government policy for the benefit of our communities.’</p> <p>Core Policy 2: managing demand ‘Delivering a safe, accessible, integrated, and resilient transport network that is well managed and enables communities to access jobs, education and all services. The network will also enable efficient movement and delivery of goods to support the local, regional and international markets.’</p> <p>Core Policy 3: enabling travel choices Enabling travel choice in our communities that reflects their unique needs, ensures their safety, actively promotes health & wellbeing, and protects the environment.</p> <p>Core Policy 4: delivering solutions</p>
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	<p>‘Work collaboratively to identify and develop innovative transport related solutions which promote health and wellbeing of our communities, provide betterment to the environment, and provides good value for money while enabling travel choice and improving our transport network users’ experiences.’</p> <p>Core Policy 5: embracing innovation ‘Embrace innovation and collaboration, which enables us to decarbonise transport and adapt to climate change to ensure a resilient transport network, while benefiting the environment and delivering travel choice to promote health and wellbeing within our communities’</p> <p>Note: a minor spelling mistake on page 146 bullet point H of Policy IN2, the word charging is missing a ‘G’.</p>
Chapter 9: Managing Development	<p>Resilient Design section could include reference to Mineral site restoration use for climate change mitigation (e.g. water storage or habitat creation), and the GI Policy could also mention minerals and waste site restoration perhaps in wider context in supporting text.</p> <p>Minerals and Waste safeguarding could be mentioned in the wider context. As the adopted Plan was adopted before our LMWLP there is no cross reference and there does not look to be a new bit on it either.</p> <p><u>Policy D1 – Raising the Standard of Design</u></p> <p>Suggest naming LTN 1/20 in the policy under point (b). Requiring compliance with the standard is recommended.</p> <p>No in principle issues from a transport perspective with proposed Policy D1 (page 157), but a minor editorial point: in part b) amend as follows ‘...Leicestershire Highways Design Guide [delete: other current Government endorsed documents]...’. (LHDG is not a government endorsed document.</p>
Appendices	<p>Appendix 4 of the draft plan – page 171 - Note that this links to the infrastructure delivery schedule in the adopted 2018 plan. Page 81 of this plan, reference to the HWRCs and an out of date timescale / phasing period.</p>

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