



Date: 27 October 2020
Your Ref: Melton North SN Masterplan
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Dear Sarah,

Melton North Sustainable Neighbourhood Masterplan

Thank you for your e-mail dated 1 October 2020, inviting comments from Leicestershire County Council on the draft Melton North Sustainable Neighbourhood Masterplan (October 2020).

As you are aware, Leicestershire County Council (LCC) has a significant interest in the form and detail relating to this masterplan, as it does in relation to all growth in and around Melton Mowbray. LCC is the main provider of infrastructure for which the Borough Council's whole growth strategy is based. It has interests as a strategic partner, statutory consultee and as landowner. Given this context and the inter-dependencies between our respective authorities, it is extremely disappointing that the document has been produced with minimal input from the County Council. I would have expected the document to have evolved as an iterative process over many months, with regular meetings set up to make sure that all concerns, ideas and comments are built in, allowing for ideas and aspirations to be fine-tuned. The quality of the document is substantially weakened as a result. This way of working was never envisaged when the requirement for a masterplan was discussed at the Melton Borough Council Local Plan examination in 2018.

The County Council has been presented with a lengthy (164 page) document and given just 24 days to review and comment. The lack of engagement with stakeholders and the community is also a concern. This is important to note as this substantially dilutes the value of the document and the weight that can be afforded to it. I should add that this lack of engagement reflects our experience when the Melton

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South Sustainable Neighbourhood Masterplan was produced earlier this year and therefore LCC regards the weight to be given to that document, equally limited.

To set the context, Policy SS5 of the Melton Local Plan (October 2018) states, that the Borough Council "will work in partnership with developers and delivery partners to deliver the Melton North Sustainable Neighbourhood (MNSN)".

Policy SS5 also states that a masterplan, including a phasing and delivery plan, should be prepared and agreed in advance of, or as part, submission of a planning application for the MNSN. Several planning applications have been considered and determined in the two years since the Local Plan was adopted. This means that the masterplan is now guided by the planning applications that the borough council has approved, rather than the other way around. This contradicts how this strategic allocation was envisaged to be brought forward. This developer-led trend appears to be continuing as we are presented with a draft masterplan that is written by developers who have their own commercial interests.

Policy SS5 goes on to say that in order to achieve a comprehensive approach, the masterplan should be prepared for the whole MNSN. This is a key component of the policy as it seeks to make sure that the amount, distribution and location of land uses and a timetable for their implementation is agreed for the whole MNSN. This allows for the proper implementation of the different components of the scheme, ensuring that infrastructure is delivered at the right time in relation to when the different phases of development come forward. It was intended that this would bind together all the different components of the development and make sure it is delivered in a co-ordinated and logical way. It sought to make sure that commercial interests did not outweigh or supersede the requirement for high quality sustainable development.

The masterplan document only covers part of the MNSN, the part that the developers involved in producing the document have control over. The September 2018 Inspector's report into the Melton Local Plan (paragraph 68) commented on the masterplan "for the entire north SN" being in preparation and due to be submitted that year as part of a planning application. Clearly that work was never completed, and this has led to a disjointed approach to delivering the MNSN. By leaving out part of the allocation that is owned by other landowners / developers, this makes it impossible to define a suitable phasing and delivery plan or to agree a co-ordinated way of delivering infrastructure. It also means that securing consistent design standards, landscaping, materials, public realm etc. across the whole SN becomes much more complex than it ought to be and opens up time consuming piecemeal negotiations with developers. As well as conflicting with policy SS5, this also contradicts the vision for the masterplan itself set out in section 3 of the draft document.

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The form and style of the MNSN draft masterplan is inconsistent with that which has been produced for the South SN. That document was produced on behalf of the Borough Council. It isn't clear why this draft masterplan for the north SN hasn't been commissioned by the Borough Council, to avoid any risk or perception of it being driven by commercial factors. While there is no requirement to produce a consistent document in terms of format, the content and analysis that underpins the vision and objectives are different between the masterplan documents and there is no explanation as to why a different approach has been taken. The South SN masterplan sets out different options for delivery and comments were invited, albeit at a very late stage, from LCC about the preferred approach. The North SN masterplan presents a single solution, which is not helpful given the lack of opportunity to shape the option being presented.

From a viability perspective, LCC has similar concerns in relation to the MNSN as it has consistently expressed for the Melton South Sustainable Neighbourhood (MSSN). The MNSN masterplan focuses on setting out an aspirational form for how the site will be brought forward but there is very little detail to give assurances that the required developer contributions will be secured to fund LCC infrastructure. To help provide some confidence, an assessment of the viability of the proposals put forward should be a requirement before this document is approved. We look forward to reviewing a copy of this work alongside the updated draft of the masterplan.

LCC Education Comments

- The Masterplan proposes a 2ha site for the new primary school, which appears to be in a suitable spatial location. It is relatively central to the development, but still far enough away from the proposed new primary school on the western part of the SN. Both schools should be shown on the masterplan and included in the masterplan boundary. The detailed site specification and location would need to be subject to further discussions as this may not meet LCC requirements when considering matters such as topography, contamination etc.
- A major concern is that throughout the document the school is referred to as the "potential primary school" and it talks about having to evidence the need. The County Council has never been approached by MBC or the developers to provide further evidence on the need for the second primary school. The second primary school is a clear and essential requirement based on the 1700 homes to be built in the North. This requirement needs to be set out in much stronger terms [note comment above about this being a developer promoted document].
- Education officers did attend the meeting in July 2019, with MBC and the developers when a draft masterplan was discussed, but we have not

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recollection of having attended any meeting since then or been involved in any stakeholder events, other than occasional questions from MBC about location for the new primary school or triggers for opening. There has been no face-to-face meetings or discussions with the developers.

- Page 20 Fig 1.4 refers to 5% one bed properties, the yield calculations for the per dwelling contributions are based on 15% one-bedroom properties (data provided by MBC officers), which means the yield is understated if 5% is applied.
- The document references the 'per house' contributions and proposes the "potential primary school" be part of the first phase of development, which is positive.
- In terms of delivery, it is unclear how many houses form each phase and therefore this doesn't give us clarity over when the primary school site will be available
- Delivery of the secondary school in the South SN is linked to delivery in the north SN. The two documents don't reflect this sensitivity.
- Pg4 1.1 mentions a single catchment area for the education provision, this only applies to the secondary sector, the primary schools have their own catchment
- Pg. 16 the per dwelling tariff includes a contribution towards primary, secondary, special and post 16 provision, the Masterplan only mentions primary and secondary.
- Pg. 92 8.1 locational considerations for new primary school – we have concerns about the suggestion of shared and community use of school playing fields, this cannot be assumed and needs further consideration and discussion.
- Pg. 93 8.2 Design Parameters and Requirements – Some of these are overly prescriptive and could have a major impact on the cost and design of the building, including the building height, orientation and boundary treatment. If LCC agrees to construct the school, and is working within a given budget, these requirements may not be acceptable.

LCC Strategic Property Services Comments (as landowner)

- The Masterplanning exercise has only been undertaken in respect of those areas of the MNSN where no planning applications have been made already. It therefore excludes the 200 house Taylor Wimpey site adjoining Melton Spinney Road (being built out), the Richborough Site (outline consent for 400 houses) and Sysonby Farm (resolution to grant for 290 houses). It is therefore effectively a partial masterplan and as such fails to comply with Policy SS5.

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This is particularly evident from the introduction where it is noted that the details of Policy SS5 and the Project Brief are not of those elements of the full adopted local plan policy being delivered by the existing commitments including the Sysonby Farm site.

- By excluding other areas of the MNSN from the process and failing to engage fully with the appropriate landowners and developers the LPA will be unable to provide an accurate delivery trajectory over the total development area which could have a negative impact on its ability to provide a robust strategy for the delivery of essential infrastructure.
- Similarly, there will be no common policy framework on which to judge the future reserved matters applications for the sites west of Scalford Road in terms of achieving a consistency of design standards for example. In some ways that might be to the County Council's commercial advantage as it potentially gives the developer greater freedom. However, there is a risk that MBC will seek to apply Masterplan codes to land outside the reduced plan area without consideration of the impact.
- It is noted that, in common with the MSSN, the Masterplan will only be adopted by MBC Cabinet resolution and as such will not be subject to the same level of scrutiny or carry the same weight as a plan which sought to have SPD status.
- The Local Plan allocation for the North SN was for a minimum of 1700 houses with 1500 being delivered in the plan period. Taking into account the findings of the previous viability updates which indicated that the MNSN would be notionally viable at 1700 houses in order to reduce the risk of delivery not being secured a figure of 2100 would be more realistic. 2100 houses represent the commercial capacity of the site as expressed in the landowners' representations on the local plan. Together with the committed housing numbers the MNSN will, based on the Masterplan, deliver 2120 houses.
- One area of concern is that fact that no viability appraisal has been undertaken to support the Masterplan. Whilst the 2019 Viability Study suggested that the MNSN would be viable, a fact that MBC would rely upon in trying to secure S106 contributions for a policy compliant development, there are a number of references in the Masterplan, not least those relating to additional education requirements, that suggest that viability will be used by the developers to achieve a more favourable S106 settlement which creates a risk either to County Council through the non-delivery of funding for services or to MBC by reducing the already low level of affordable housing.
- The basic layout delivers a similar structure to that of the sites to the west of Scalford Road with a spine road connecting to major junctions on the MMDR and linking the individual development plots and community facilities.

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LCC Highway Comments

See attached.

It has not been possible in the time available to seek comments from other LCC services, including public health, social care, ecology, archaeology, landscaping or heritage. It has also not been possible to fully review the document in relation to the requirement for other LCC developer contributions such as library services and waste. These types of masterplan documents serve a number of purposes, but to be worthwhile and add value to the quality of the development, it is essential that full engagement with all relevant stakeholders takes place before they are approved.

The County Council objects to this version of the document being approved in its current form but would be willing to consider revisions that address the concerns raised. I suggest that at least six weeks be given to allow more considered responses to be provided to future versions of the masterplan. As with the South SN masterplan, the County Council will give limited weight to an approved masterplan document that has not been subject to proper engagement with all stakeholders when reviewing and commenting upon planning applications.

Please do not hesitate to contact me if you would like to discuss this further.

Yours sincerely,



Nic Thomas

Head of Planning, Historic and Natural Environment