

Gladman Developments Ltd

Matter 2 Hearing Statement

Melton Local Plan

Overall Spatial Strategy



January 2018

Matter 2 – Overall Spatial Strategy

Question 2.1

Does the Plan provide a sound framework for the roles that will be played by various parts of the Borough in meeting development needs over the plan period? In particular:

(i) Are the development strategy, settlement hierarchy and broad apportionment of growth (policies SS2 and SS3) consistent with the Plan’s vision and strategic objectives?

1.1.1 Gladman consider that the proposed development strategy, settlement hierarchy and broad apportionment of growth (policies SS2 and SS3) are generally consistent with the Plan’s vision and strategic objectives.

1.1.2 However, we have raised significant concerns regarding the adequacy of the plan to meet the Full Objectively Assessed Needs (FOAN) of the community and wider HMA. Those concerns have been explained in our submissions to Matters 1 and 3. The implications of promoting a plan that does not seek to meet the FOAN, is that a number of the Plan Objectives are rendered ineffective and therefore unsound.

(ii) Are they founded on robust evidence, consistent with national planning policy and deliverable?

1.1.3 As outlined above, Gladman have fundamental confirms with the evidence which informs the development strategy, which is explained in our submissions to Matter 3.

1.1.4 Gladman are broadly supportive of the proposed distribution of housing being directed towards Melton (65%) and the Service Centres and Rural Hubs (35%) based on the proposed housing requirement. However, Gladman also consider that the proposal for a new Garden Village at Six Hills should be allocated in the Plan and therefore that it should be referenced in the policy as it would not fall under the current proposed growth locations of Melton or Service Centres and Rural Hubs. As demonstrated through the other Hearing Statements to this EiP, allocation of the Six Hills site would help address housing needs arising from an OAN of 280 dwellings per annum (see Matter 3) and a demonstrable shortfall of supply from sites within the Plan (see Matter 6). The site would also offer some additional housing to address pressing unmet needs within Leicestershire.

1.1.5 Gladman consider that the wording in paragraph 4.2.1.6 of the supporting text for Policy SS2 regarding “Development on unallocated sites in the rural area” is not consistent with the flexible

- approach advocated in national planning policy, as it is overly restrictive, and should therefore be deleted.
- 1.1.6 The paragraph's inclusion also does not correspond with the main effect of the change listed in Table 1 which commented that it "*Replaces site size thresholds for unallocated sites with links to scale and character of host settlements.*" The site size thresholds have not been replaced, merely transposed to the supporting text.
- 1.1.7 The wording of policy SS2 as currently drafted is not considered to be consistent with national planning policy as it could serve to unnecessarily restrict sustainable opportunities for growth in settlements that have been identified as Service Centres, Rural Hubs or Rural Settlements. This would not be consistent with paragraph 47 of the NPPF which highlights a need to "*boost significantly the supply of housing*", nor with paragraph 55 which requires housing to be located where it will enhance or maintain the vitality of rural settlements to promote sustainable development in rural areas.
- 1.1.8 The policy should not arbitrarily limit the scale of development to "small" sites that can come forward in these settlements of between 3 and 10 dwellings. As currently worded, Policy SS2 could be used to restrict schemes from progressing that are demonstrably sustainable. This is not consistent with the above national planning policy objectives.
- 1.1.9 Gladman recommend that the Plan should provide flexibility to ensure that the sustainable credentials of all development opportunities that have not been identified can be assessed on their individual merits using criteria-based development management policies.

(iii) Is the role of Table 4 in informing the detailed housing allocations policies sufficiently clear? Is its evidential base sufficient for its purpose?

- 1.1.10 Gladman consider that the amalgamation of the previous information (shown in Tables 4-7 in the Pre-Submission Local Plan) into Table 4 is sufficiently clear. However, it is considered that the approach to setting the requirement is somewhat restrictive.
- 1.1.11 Paragraph 4.2.18 outlines that information on population has been calculated for each settlement, with the general approach that "*development should be commensurate with existing settlement size*". This then gives rise to the approach of distribution set out in Table 4, but it has no bearing on the actual sustainability credentials of each settlement.
- 1.1.12 This approach therefore does not take account of the evidence produced for the Local Plan such as the Settlement Roles, Relationships and Opportunities Report, nor the Settlement Hierarchy. Instead it arbitrarily allocates a proportion of new housing to settlements, effectively ignoring this evidence. Therefore, a large settlement with few shops, services and community facilities may be

prioritised for growth arbitrarily over a smaller settlement with a better range of supporting facilities. For example, Appendix B to the Plan shows that Long Clawson, with a population of 1,066, has exactly the same sustainability credentials as Asfordby (with over double the population at 2,446) in terms of the range of facilities selected. It is also the third highest scoring settlement in the Borough outside of Melton Mowbray according to the Settlement Roles and Relationships Study, with a score of 39 (Asfordby scoring 44 by comparison) and both are classified as Service Centres in the Plan. It would therefore appear on the evidence, that Long Clawson could accept a similar level of additional development to Asfordby, yet the settlement is only allocated 128 dwellings (7% of the population), compared to Asfordby which is to receive 290 dwellings, based on 16% of the population.

- 1.1.13 Therefore, Gladman consider that reliance solely on the residual requirements shown in Table 4 could serve to restrict the consideration of other sustainable development opportunities on land that becomes available in those locations during the plan period.

Question 2.2

Does Policy SS3 provide effective guidance for development proposals on unallocated sites in/on the edge of existing rural settlements? How will the risk of inconsistency with the development strategy from repeated application of the policy be assessed?

- 1.1.14 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.
- 1.1.15 Gladman have recommended, through our previous representations, that reference to “*repeated application*” is removed from the policy. There is no certainty as to whether this means the submission of too many applications for a settlement or when this provision would apply. The decision-maker will already consider whether it has been demonstrated that the proposal will result in a level or distribution of development that is inconsistent with the development strategy as it is part of the policy requirement.
- 1.1.16 There is therefore a risk, that the approach of considering if there have been “repeated application” of Policy SS3, could be applied indiscriminately to prevent sustainable sites from being brought forward.