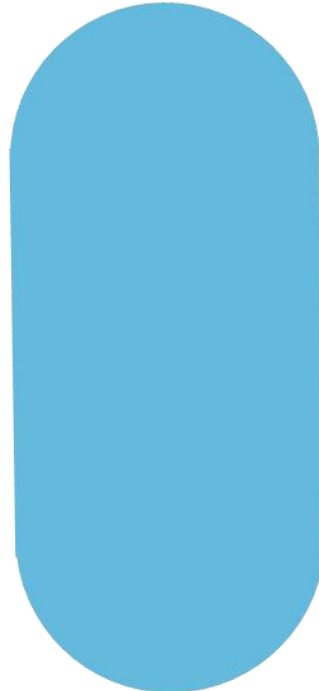


**WRITTEN STATEMENT IN RESPECT OF THE MELTON LOCAL
PLAN EXAMINATION JANUARY 2018**

MATTER 2: OVERALL SPATIAL STRATEGY

On Behalf of Crofts Developments Ltd



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1. Paragraph 2.1

Question:

Does the plan provide a sound framework for the roles that will be played by the 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?*
- ii) Are they founded on robust evidence, consistent with national planning policy and deliverable?*
- iii) Is the role of Table 4 in informing the detailed housing allocations policies sufficiently clear? Is its evidential base sufficient for its purpose?*

Response:

- 1.1 Crofts Developments Ltd supports the identification of Harby as a Service Centre (SC).
- 1.2 Whilst it is wholly agreed that the flexibility provided in the emerging Local Plan in terms of use of terminology such as "at least" and "approximately" is a positive, it is considered that the Council still have not apportioned the growth sufficiently taking into account the sustainability and land availability of each settlement.
- 1.3 In respect of Policy SS2 of the Plan, it is considered that the current settlement hierarchy should be reviewed and a higher level of growth should be allocated to the Service Centres (SC) than the Rural Hubs (RH). The SC's are inherently more sustainable than the RH's as is noted by their definition, and therefore the level of growth proposed for the SC's should be higher than is proposed for the RH's, just as the level of growth proposed for the Melton Mowbray Main Urban Area (MUA) is higher than the SC's.
- 1.4 The approach to the apportionment of development across the borough is based on the population of individual settlements alone. However, it does not follow that the larger the population of a settlement, the more sustainable it is; this is clear from the fact that, as identified in Table 4 of the Plan, there are a number of settlements identified as SCs that have lower populations than other settlements identified as RHs (for example, Asfordby Hill, Frisby on the Wreake and Great Dalby are identified as RHs (i.e. less sustainable than SCs) yet were initially (prior to adjustments made for completions) expected to accommodate the same or a higher proportion of development than Old Dalby, Hose, Somerby, Scaford, Stathern and Wymondham, all of which are identified as more sustainable SCs. It is considered that this approach is flawed as it does not allow for higher levels of development in the most appropriate and sustainable locations. Rather, the distribution of housing should be allocated based on levels of sustainability and the capacity of settlements to accommodate further development. A key soundness test of Local Plans is that they must be justified (NPPF, paragraph 182), meaning they must be based upon appropriate and proportionate evidence.

- 1.5 In relation to capacity of settlements to accommodate further development, it is noted that Table 4 of the Plan also identifies (taking into account completions/sites with planning permission and sites under construction) a residual requirement for 214 dwellings in Asfordby but the capacity from proposed site allocations only equates to 160 dwellings. Again, in the case of Croxton Kerrial there is residual requirement for 68 dwellings with land capacity for only 55 dwellings. Whilst settlements such Harby have a capacity to accommodate 115 dwellings, yet the residual requirement for this settlement is only 99 dwellings and could thus be higher.
- 1.6 To summarise, it is considered that the approach to the distribution of housing in the Plan is clearly flawed and cannot be said to be justified or consistent with national policy.
- 1.7 Finally, in relation to the clarity of Table 4, it is considered that in respect of Policies SS2 and C1(A), the housing allocation/capacity figures need to be expressed more clearly as approximate indicative figures, as it is considered that these figures are based on insufficiently accurate assumptions about net developable areas.