Melton Local Plan - Matters and Questions for the Examination

Bottesford Forum

Matter 2 Overall Spatial Strategy

The Inspector has put three detailed questions under matter 2. Bottesford Forum has at the various stages of the plan preparation process repeatedly raised concerns with the Council regarding the manner and methodology used to apportion the District wide housing total to the constituent parts of the Borough. The Forum is not challenging the overall scale of housing for the Borough as a whole.

Detailed Question 2.1 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?

Bottesford Forum considers that there is a degree of inconsistency in the Plan in that seeking sustainable development locations should also include sustainability with regard to flood risk. Bottesford is one of the larger rural settlements in the Borough but it is also one that is affected by flooding. The manner in which the Council has allocated housing numbers for identified rural settlements is considered arbitrary and mechanistic and does not take into account general and specific site constraints in the settlement. In short the Forum considers that there is a gap between the apportionment of (housing) growth and the vision/objectives of the Plan.

Detailed Question 2.1 ii) are they founded on robust evidence, consistent with national planning policy and deliverable?

Bottesford Forum considers that the apportionment of growth is not based on robust evidence. It has been derived largely on a mathematical exercise first providing an arbitrary percentage for the housing to be provided in or around Melton Mowbray and then apportioning the remainder to selected rural settlements on the basis of their population. No site based/development constraint methodology has been used – the apportionment of housing has remained remarkably similar in the various stages of the Plan process despite the fact that in 2016, the District planning officer addressing a public meeting in Bottesford admitted that no detailed site analysis had been undertaken at that stage. The Local Plan bridges broad strategy and detailed site identification either for development or for policy boundaries (e.g. open breaks). Bottesford Forum considers that the Plan is not soundly based in this regard.

Detailed Question 2.1 iii) is the role of table 4 in informing the detailed housing allocations policy sufficiently clear? Is its evidence base sufficient for the purpose? Bottesford Forum considers that the role of table 4 is reasonably clear but that it is fatally flawed as discussed in detailed question ii) above. This is just an arbitrary population apportionment method which does not take into account development restraints (eg flooding, transport), spare capacity in schools or the size of identified

development sites which are all relevant to temper the results derived from Table 4. The Forum considers that Table 4 is a starting point for Plan preparation but is not and should not be the principal policy guide for development land allocations to specific settlements. Also the Forum considers that here should have been a rigorous robustness test of the Council's approach. An increase in the percentage allocation to Melton Mowbray may not appreciably affect the quantum of housing in that town but it does have a much bigger impact on quantum of housing directed to the rural settlements.

In summary the Forum considers that table 4 and the approach underlying it is flawed and should not be used as the principal guide in the allocation of housing requirements to specific rural settlements, that the evidence base is not sufficient or appropriate for this housing allocation purpose and that no effective robustness testing has taken place.