

Carl Powell (231 / 150)
Somerby
28th Dec 2017

MELTON LOCAL PLAN - Matters and Questions for the Examination

Dear Inspector Mary Travers,

Important parts of the draft Melton Local Plan (MLP) and Focussed Changes are unsound for want of proportionate and reliable evidence. Some policies are unsupported by evidence and some ignore the evidence. In the worst cases evidence has been selected or even created retrospectively to justify policies already preferred and pre-determined.

This is most apparent in matters relating to housing numbers and site allocations and to assessments of environmental sustainability. Also to wrongly defining what is 'Strategic' and thus claimed as the exclusive gift of the Local Plan as against any Neighbourhood Plan.

Somerby Parish will be unavoidably prominent in this document simply because it is the place about which I know enough to write. However I believe other villages in the rural Borough have been similarly treated; please consider Somerby an example.

MATTER 4: The Melton Mowbray Sustainable Neighbourhoods

4.1 Are the sustainable neighbourhood allocations as a whole consistent with the strategic objectives for Melton Borough?

Yes - as a whole they are consistent with MBCs strategic objectives. They would meet the OAN (which I am arguing is 4,250 not 6,125 dwellings) and they seek to place housing development where there is employment opportunity and access to public transport (and the major roads network), and where environmental harm would be relatively less.

4.2 Based on all the evidence have they been positively prepared and has their identification been adequately justified?

No - because they are based on a poorly-evidenced 'policy' target of 6,125 when the FOAN is for only 4,250 (**Matter 3**).

4.3 Unable to say.

4.4 Have the interdependencies between the delivery of the MMSNs and Melton Mowbray Transport Strategy, especially the Distributor Road, been made clear and have they been adequately taken into account?

No - the interdependency has not been made clear *to the public*. A strategic decision has been made to drop Borough affordable housing provision from 37% to about 21% (mainly due to a drastic reduction to 15% in the MMSNs). Focussed Changes explains this as due to 'viability' issues (developer contributions). This only happened in June 2017. MBC should say more explicitly and loudly that affordable housing has been dropped to pay for the Distributor Road. My own view is that in the present state of the market, with house prices continuing to rise in Melton, profits from housing development are high enough for both. However I do not live in Melton Town so defer to those who do.

4.5 Unable to say – insufficient knowledge.

Conclusion

If I could only make four points from all of the above they would be:

- 4,250 not 6,125 is the soundly evidenced housing target for Melton Borough. HEDNA is more objective and thorough than TAHR and the addendum to TAHR which were commissioned solely to justify decisions already made.
- Serious environmental 'negatives' in the Sustainability Appraisal have been ignored or deliberately replaced in the MLP Evidence Base. Housing delivery is important, but the draft MLP elevates it unduly to the exclusion of many important paragraphs of the NPPF.
- In claiming every single one of its policies (except three in Chapter 9) to be a 'Strategic Policy' MBC seeks to monopolize control of all important planning and decision making. This is contrary to NPPF paras 184 and 185. In particular, calling every single site allocation a 'strategic policy' is untrue and unsound.
- The most important parts of the draft Plan are not based on the evidence. Evidence has been ignored, or even found retrospectively to

justify policies already decided. This is the absolute opposite of soundness.

It was made abundantly clear to me at that meeting with MBC on 11th September 2017 that there was *nothing* I or my neighbours could say to MBC to change *anything* in the draft MLP, and if I didn't like that I should try telling the Inspector. So that is what I'm doing.

I have not asked to speak on my own behalf at the Examination but would endeavour to do so if invited. I am more than happy to discuss or explain by email anything I have written if thought useful. Thank you for reading.

Yours sincerely,

Carl Powell