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## Melton Local Plan Examination 2018

Matter 2

Response to Inspector's Questions on behalf of  
Barratt David Wilson Homes



## **Matter 2: Overall Spatial Strategy**

*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?*

It has been the consistent position of Barratt Homes in representations to the emerging Local Plan that insufficient weight has been accorded to the sustainability credentials of Bottesford having regard to its sustainability credentials as by far and away the most sustainable village in the Borough as identified in the Settlement Roles and Relationships Report of April 2015. Appendix 1 – Village Performance of that document – MBC/SS2 (and reassessed in MBC/SS3b) clearly demonstrates that the settlement not only has the greatest range of local services and facilities of all the settlements outside of Melton Mowbray, but has both rail and bus connections along the A52 corridor linking it to the major city of Nottingham and also to the towns of Grantham and Bingham with their greater services and employment opportunity. In terms of geography and connectivity, Bottesford relates far more closely to these two towns than Melton Mowbray itself which is at best an hourly daytime service only taking 50 minutes.

It is the view of Barratt Homes as set out in earlier representation to the emerging local plan that Bottesford should be given an enhanced 'key settlement' status and additional growth accorded to it reflecting its vastly superior sustainability and accessibility to all of the other settlements in the Borough. The Council's 'proportionate approach' to settlement growth outside of Melton Mowbray and allocation of housing numbers to its Service centres is essentially based upon the existing population of its settlements as opposed to any weighting to reflect the nature and capacity of their facilities, services, connectivity and availability of alternative public transport options (with adjustments only made where a settlement is deemed not to have physical capacity to accommodate its allocated growth). The 'proportionate approach' based only on current population rather than current facilities and the availability of and accessibility to employment opportunity is not the optimal approach to delivering many of the Local Plan's specific strategic objectives including:

2. Develop a housing stock to provide for the future aspirations for the local economy.
5. Help regenerate the rural economy
9. Reduce the need to travel by car and improve access to public transport
12. Improve access to services and facilities, including health, schools, social care, jobs, recreation, sport and education, broadband
13. Promote sustainable communities

The geographical and demographic configuration of Melton Borough and its Service Centres and Rural Hubs in their rural setting, and the huge variances in their respective services, facilities and accessibility, is such that the strategy of a simple proportionate approach applied to growth is not considered to be sound as it fails to acknowledge the additional service capacity and facilities

of Bottesford as its most sustainable settlement. It is of further concern that the Council should then take a view (disputed by Barratt) that Bottesford and Asfordby as the second and third largest settlements in the Borough cannot accommodate their own residual requirement through application of the proportionate approach and so it is intended that (far) lesser equipped Service Centres accommodate the shortfall in provision irrespective of their relative unsustainability compared to Bottesford and Asfordby. This is another matter to which Barratt have made representation in the promotion of their landholding east of Belvoir Road in Bottesford.

*ii) Are they founded on robust evidence, consistent with national planning policy and deliverable? [Note: the soundness of the specific site allocations including the Melton Mowbray Sustainable Neighbourhoods will be considered under Matters 4 and 5]?*

Barratt Homes consider that the Council's simplistic proportionate approach to its housing allocation to its service centre and rural hubs is not the most robust and effective approach to delivering sustainable development across the Borough to achieve the Council's vision and objectives. The assessment to establish which settlements are not capable of accommodating additional growth and meeting needs is a sensible refinement of the strategy (albeit Barratt dispute the assertion at paragraph 4.2.21 of the Plan that Bottesford cannot accommodate its residual requirement). Conversely however, the failure to recognise and target settlements which can support additional growth through its service base and /or accessibility is a major weakness in the Council's spatial strategy, particularly in this emerging plan where the role of Bottesford, the second largest settlement in the Borough, is not optimised in terms of its capacity for supporting further growth.

Failure to properly apportion housing growth without sufficient regard to services, employment and transport opportunity can impact upon deliverability and sustainable development. Melton Borough is potentially a strong vibrant housing market area yet deliverability of housing is a consistent issue. Proper recognition of the role, service base and locational advantages of Bottesford through additional growth that sets it above the proportionate approach applied to the other settlement in the hierarchy would constitute a more robust approach that is clearly consistent with national policy and sustainable delivery.

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

Table 4 is clear in that it sets out the simple process of allocating new dwellings to Service Centres and Rural Hubs in proportion to their existing populations (minus commitments and then 'adjusted' to reflect the alleged capacity of the proposed policy C1 (a) allocations). This approach and the resulting calculation of the residual requirement has led to the second and third most sustainable settlements of Bottesford and Asfordby receiving less housing (in terms of allocations) than their residual requirements, with the 'shortfall' accommodated by other settlements where the indicated capacity of allocated sites exceed their respective residual requirements.

This approach to the selection and quantum of the housing allocations for Bottesford and Asfordby in particular would suggest that there are material capacity constraints that limit the

potential for growth in these two more sustainable settlements, hence the re-apportionment to far lesser served service centres. Barratt Homes position is that there is capacity within Bottesford not just to meet the residual requirement, but to deliver additional growth that its service base and connectivity can support. Indeed their Belvoir Road landholding was amongst a number of large site options assessed during the plan preparation process in the Melton Alternative Large Scale Development Sites Assessment Report 2015 (MBC/SS5). Whilst the site was discounted as a preferred option as a Sustainable Urban Extension (to accommodate 400+ dwellings), the site is readily capable of accommodating a lesser yet still significant scale of development and certainly sufficient to ensure that any requirement based on the 'proportionate approach' can be accommodated within the settlement.

The Borough Council are already dependent upon the town of Melton Mowbray to deliver approximately 65% of the housing requirement. It appears bizarre therefore for the Council to then under provide against their own proportionate approach strategy for their second and third settlements in terms of both population and sustainability, leaving the slack to be picked up by smaller Service Centres, all bar one with a population of under 1000 and unsurprisingly with a relatively limited service base. Whilst provision in the local plan of a range and variety of sites and locations is supported by Barratt, the failure to optimise opportunity in Bottesford and Asfordby is not a sound framework for meeting development needs in the geographical and demographic context of Melton Borough and its settlement structure.

*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?*

With a record of persistent under delivery of housing in Melton Borough and concerns about the deliverability and/or rate of delivery from a number of allocated sites in policy C1 (a), Barratt consider that policy SS3 potentially offers positive intent to support additional sustainable growth in the rural areas, although they consider that the policy as drafted is too cumbersome and disproportionate in its requirements. In response to the consultation on the Focussed Changes, Barratt objected to the drafting of SS3 with regard to deleting the word 'or' as the final word in criteria 1 as this change renders the policy far too restrictive in delivering additional unallocated sites by requiring any/ every unallocated site to conform to a community led strategy or housing or economic needs assessment.

Barratt acknowledge the Inspector's questioning of possible inconsistency with the development strategy through repeated application of policy SS3 to deliver housing in rural areas. However, they have concerns about the soundness of the Council's overall approach to development and consider that the range and quantum of sites allocated within policy C1 (a) will not fully meet the housing needs of the Borough within the delivery trajectory proposed (MBCHS 1A) . If the Inspector deems that policy SS3 as drafted conflicts with the development strategy and needs refinement, then the housing allocations should be supplemented to ensure that sufficient homes are allocated with Housing Allocations policy C1 (A) supported by Reserve Site policy C1 (B) to ensure that the housing need is met in full in the most sustainable locations in the Borough.