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## Focused Changes - Melton Local Plan Consultation (<https://meltonboroughcouncil.citizenspace.com/planning-policy-team/copy-of-focussedchanges-addendum-consultation-s/>)

### Response 128578246

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Include unanswered questions

### About you

**\*\*CONSENT TO PUBLISH\*\*** Please note: your response will be published after the consultation closes. Please confirm you understand and agree to publish your name by ticking the box below.

*Please select one item*

(Required)

Yes, you may publish my name with my response

### What is your name?

Name (Required)

Colin Love (Professor)

**Please indicate if you are completing this survey as a resident or other type from the list below (tick all that apply)**

*Please select all that apply*

(Required)

Agent

Developer

Landowner

Resident

Stakeholder

Consultee

Other (please specify below)

**Did you complete a previous representation for the Melton Local Plan consultation held in November 2016?**

*Please select one item*

(Required)

Yes

No

**FC1 Spatial Strategy (Policies SS2 and SS3)****Would you like to submit a representation for: FC1 Spatial Strategy (policies SS2 and SS3) section of the focused changes?**

*Please select one item*

(Required)

Yes

No

**1. FC1 Spatial Strategy (policies SS2 &SS3)****1. Please indicate which part of the focused changes addendum for the Melton Local Plan or supporting documents this representation relates to.**

Focused change policy or paragraph reference:

4.2.1 Housing and economic growth

**2. Do you believe that this policy/section of the Melton Local Plan:**

(Required)

Is legally compliant

Please select one item

- Yes
- No
- Unsure

Is sound

Please select one item

- Yes
- No
- Unsure

Complies with the duty to co-operate

Please select one item

- Yes
- No
- Unsure

**3. If you answered No to 'sound', please answer this question... Do you consider that this policy is unsound because...**

Please select all that apply

- it's not positively prepared
- it is not justified
- it isn't effective
- it's not consistent with National Policy

Please provide comments for why you believe it is unsound or fails to comply with the duty to co-operate. OR If you wish to support the legal compliance or soundness of this policy, or its compliance with the duty to co-operate: (Required)

The wording confirms that HEDNA 'provides a consistent, objective assessment of need for housing' and identifies 'an Objectively Assessed Need for the equivalent of 170 new dwellings each year from 2011 - 2036 for the Borough of Melton'. 4.2.2 In 4.2.2 the Melton TAHR clearly choses to refute and reject this 'consistent, objective assessment' - and purports that 'wider considerations' justify between 230 - 280 dwellings per annum ( 35 % - 64% above that 'consistent, objective assessment'). Then, without any apparent objectivity, the 'Council has agreed a housing equivalent of 245 dpa within this range'. This 245 represents 44% above the HEDNA's 'consistent and objective assessment' need for the equivalent of 170 new dwellings each year. Policy SS2 Development Strategy provides a possible answer as to why Melton is proposing this 44% increase in housing provision above HEDNA's assessment of need. It states ' Development will be expected to contribute positively to the provision of key infrastructure including traffic relief within the town...! That is to say, the proposed number of new dwellings within the Plan period is not being driven by HEDNA's 'consistent and objective assessment' of housing need. Rather, it is being driven by the objective to obtain sufficient developer contributions to the building of a town bypass. The proposed Melton bypass is wagging the housing numbers! This has very significant issues for the proposed housing development in the rural areas. SS2 states that 'Service Centres and Rural Hubs will accommodate approximately 35% of the Borough's housing need on a proportional basis'. This means that the 'approx 35%' will be based on the proposal to inflate that 'housing need' 44% above that of HEDNA's 'consistent and objective' assessment. The planning consequence of this mathematical,

percentage, approach to allocation on inflated housing figures is that the rural communities will be required to take a far larger number of new houses than would have been derived from the HEDNA assessment of need. It defies any planning logic or justification that Service Centres and Rural Hubs should be required to take this extra housing as a direct consequence of a desire to get better infrastructure (bypass) at Melton town. This is unacceptable. New housing in rural areas, areas that are likely to be identified as the least sustainable within the Borough (travel to work etc), should and must be built only where there is identified local need. A case in point is the Parish of Bottesford. FC 1.3 The proportional approach states ...'the general approach that development should be commensurate with existing settlement size'. In September 2015 Melton commissioned a rural housing needs assessment for Bottesford Parish. This assessment identified housing needs far below those in the present Melton Plan proposal. Whilst Bottesford is the second largest settlement within the Borough it has to be recognised that its substantial growth during the past 40 years was permitted when the whole issue of 'sustainability' in today's planning terms was simply not on the agenda. The proposed growth of Bottesford on the inappropriate mathematical 'proportionate' basis, well beyond this identified local need, will only contribute to unsustainable extensive travel to work. This fundamental issue is exacerbated by the proposed new wording saying that Service Centres and Rural Hubs will accommodate approximately 35% of the Borough's housing need. Whilst recognising some need for flexibility in any planning process, what is meant by 'approximately' - what parameters are envisaged? As written, it could be presenting an open door for even larger numbers of housing to be allocated to Bottesford Parish. If the proposed numbers of new houses for the Borough, well above the HEDNA 'objectively assessed need', are to be principally justified on the basis of infrastructure developments, and maybe increased employment, within Melton town, then any such 'flexibility' should only be driven towards potentially increasing the percentage allocated to Melton - not to the Service Centres and Rural Hubs. This can, and should, be a clear part of the stated Plan policy. Further, to my reading and understanding, the HEDNA report provides no grounds for confidence that Melton will experience major or even substantial, economic growth. Indeed, it evidences that forecast growth will be at the lower end of the areas evaluated within the report. I suggest that Bottesford provides a further example of the inappropriateness of the 'proportionate' basis of housing allocation. It takes no account of the fact that Bottesford is identified as being located in a high flood risk area. Whilst acknowledging that each of the proposed preferred SHLAA sites within the Parish is deemed not to be subject to flood risk, the severe flood of 2001 clearly showed that the flooding occurs through large areas within the street networks within Muston, Easthorpe and Bottesford - over spilling in to many adjoining houses. This made the parish extensively impassable to local and through traffic and pedestrians. It is not sufficient to simply look at each individual SHLAA site - it is necessary to look at the evidence based reality - BOTTESFORD FLOODS. This is not taken in to account in the present 'proportionate' basis for housing allocation. In addition, the 'proportionate' approach makes the untenable assumption that because Bottesford is already the second largest settlement within the Borough it can absorb a 'proportionate' number of extra houses. But because a settlement is already large does not, on any logical basis, mean that it can absorb further substantial growth. In the case of Bottesford, a strong, evidenced based, case can be made that it is already near to its optimum size. Its village centre has a very restricted street network with limited, if any, opportunities for retail development. Parking is already a substantial problem and would only become more so with housing growth. The 'proportionate' approach to housing allocation takes no account of these issues - it is a sterile, mathematical, and inappropriate, approach to planning.

Please describe what changes you consider necessary to make the Melton Local Plan legally compliant or sound

Each of the issues raised in the above section must be addressed and changes made to this 'proportionate' approach to housing allocation. The change to 'approximately' must be clarified as indicated above. MBC must be required to demonstrate a far more reasoned case for its departure from the HEDNA conclusions. This relates to both the forecast housing requirements and the assumptions (or wishful thinking) on the economic growth of the Borough. Specific attention and regard needs to be made to the Midlands Rural Housing needs report for the Bottesford Parish (Sept 2015).

## FC2 - Melton Sustainable Neighbourhoods (policies SS4 & SS5) - Chapter 4

**Would you like to complete a representation for the focused change relating to: FC2 Melton sustainable neighbourhood policies?**

*Please select one item*

(Required)

- Yes  
 No

## 2. FC2 Melton sustainable neighbourhoods (policies SS4 and SS5)

### 2. Do you believe that this policy/section of the Melton Local Plan:

(Required)

Is legally compliant

*Please select one item*

- Yes  
 No  
 Unsure
- 

Is sound

*Please select one item*

- Yes  
 No  
 Unsure
- 

Complies with the duty to co-operate

*Please select one item*

- Yes  
 No  
 Unsure

## FC3 Growth Strategy & Housing and Economic Development Needs Assessment (HEDNA)

### Would you like to complete a representation for FC3: Growth Strategy and HEDNA?

*Please select one item*

(Required)

- Yes  
 No

## 4. FC4 Housing site allocations

**Would you like to complete a representation for the focused change relating to FC4: Housing Site Allocations, reserve sites and site specific policies?**

Please select one item

(Required)

- Yes
- No

## Housing site allocations - Rep 1

**1. Please select the settlement and clearly reference the site you are interested in (please note you can select additional sites later after you have completed this one)**

Site 1 (select one)

Please select one item

- Ab Kettleby
- Asfordby Hill
- Asfordby
- Bottesford
- Croxton Kerrial
- Easthorpe
- Frisby
- Gaddesby
- Great Dalby
- Harby
- Hose
- Long Clawson
- Melton Mowbray
- Old Dalby
- Scalford
- Somerby
- Stathern
- Thorpe Arnold
- Waltham
- Wymondham

Site reference or page/policy number: (Required)

BOT 1, BOT 2, BOT 3, BOT 4

**2. Do you believe that this policy/section of the Melton Local Plan:**

(Required)

Is legally compliant

Please select one item

Yes

No

Unsure

---

Is sound

Please select one item

Yes

No

Unsure

---

Complies with the duty to co-operate

Please select one item

Yes

No

Unsure

**3. If you answered No to 'sound', please answer this question... Do you consider that this policy is unsound because...**

Please select all that apply

it's not positively prepared

it is not justified

it isn't effective

it's not consistent with National Policy

Please provide comments for why you believe it is unsound or fails to comply with the duty to co-operate. OR If you wish to support the legal compliance or soundness of this policy, or its compliance with the duty to co-operate:

(Required)

As I have indicated in earlier sections of this response, the 'proportionate' method presently being used to allocate houses to the parish of Bottesford is totally inappropriate. I need not repeat my reasoning here. However, my previous reasoning is compounded in the wording of 5.4.3. This states 'The assessments have provided the site options available to meet the housing requirements for each location'. The fact is that it cannot be argued that the assessments meet the 'housing requirements for each location'. There is no evidence that the location of Bottesford 'requires' the 322 houses currently allocated to the 4 identified SHLAA sites - BOT1, BOT2, BOT3 and BOT4.. The truth is that Bottesford is being REQUIRED to take 322 new houses because of the top down 'proportionate' approach taken within the Draft Plan to distribute the proposed number of houses for the Borough - now standing at 44% above the HEDNA evidenced conclusions. That said, I have been extensively engaged in the on-going preparation of the Bottesford Neighbourhood Plan. When we first started this some three years ago we were given a requirement of much lower figures than currently indicated in the latest draft of the Melton Plan. Further, those figures were on a build start from 2011 and included the Barratt's Wicket' estate of 56 houses. In that context we were able to identify TWO principal SHLAA sites that would have the capacity to accommodate these additional houses. These were Rectory Farm - now referred to as BOT3 and Daybell's Farm (now referred to as part of BOT1). Through a process of extensive local consultation and professional guidance we were feeling some confidence that we could put those two sites forward for the required Local Referendum.

Since then the housing numbers have increased as have the number of SHLAA sites including those now favoured by MBC in the latest version of the Draft Plan. There has been an unexplained re-numbering of the SHLAA sites - so that BOT1, originally two adjoining sites have been amalgamated as one site despite different owners and no apparent liaison between those owners. The same is for BOT2 - originally two sites now presented as one site - but again, no evidence that there is any plan or intention for cooperation between the two site owners. These are all far too complicated issues to be examined fully and commented on in this response. As the second largest settlement within the Borough, it is a widely held view within the Bottesford Neighbourhood Plan Steering Group and beyond within the parish that there has not been sufficient detailed, sit down, face to face, consultation and engagement between MBC and the Neighbourhood Plan Steering Group on these specific issues. BOT3 - Rectory Farm. This site is the site currently most favoured by the NPSG and, through local consultation, the residents of Bottesford. However, it is noted that the eastern end of the site has been removed by MBC for potential development on the grounds of the objections submitted by Historic England - thus reducing its potential capacity. It is my (and the NPSG) assessment that the grounds submitted by Historic England simply do not make sense and the NPSG has proposed to MBC that it should examine and challenge the assertions of Historic England and re-instate the eastern end. To my present knowledge, this has not, as yet, been undertaken by MBC.

Please describe what changes you consider necessary to make the Melton Local Plan legally compliant or sound

The Plan needs to revisit the method of allocating houses to Bottesford - moving away from the inappropriate mathematical 'proportionate' method on the grounds explained in earlier sections of my response. The consequent reduction of houses will provide the immediate opportunity to reduce the number of required SHLAA sites within the parish. Further, the Historic England objections to BOT3 must be repudiated without delay - thus enabling more houses to be allocated to that site and hence reducing the required number of additional SHLAA sites - ideally to one, additional as originally foreseen by the NPSG.

## 5. Do you have additional sites to submit a response for?

Please select one item

(Required)

- Yes
- No

## FC5 Housing Mix

Would you like to submit a representation for FC5 Housing Mix?

Please select one item

- Yes
- No

## 5. FC5 - Housing Mix

2. Do you believe that this policy/section of the Melton Local Plan:

(Required)



Is legally compliant

Please select one item

Yes

No

Unsure

---

Is sound

Please select one item

Yes

No

Unsure

---

Complies with the duty to co-operate

Please select one item

Yes

No

Unsure

## FC6 - Affordable Housing

**Would you like to submit a representation for FC6: Affordable housing?**

Please select one item

(Required)

Yes

No

## 7. FC6 - Affordable Housing

**2. Do you believe that this policy/section of the Melton Local Plan:**

(Required)

Is legally compliant

Please select one item

Yes

No

Unsure

---

Is sound

Please select one item

Yes

No

Unsure

---

Complies with the duty to co-operate

Please select one item

Yes

No

Unsure

## FC7 Gypsies and Travellers policies

**Would you like to submit a representation for FC7: Gypsies and Travellers?**

Please select one item

(Required)

Yes

No

## FC8 Economy

**Would you like to make any comments on FC8 Economy?**

Please select one item

Yes

No

## 9. FC8 Economy

**2. Do you believe that this policy/section of the Melton Local Plan:**

(Required)

Is legally compliant

Please select one item

- Yes
- No
- Unsure

Is sound

Please select one item

- Yes
- No
- Unsure

Complies with the duty to co-operate

Please select one item

- Yes
- No
- Unsure

**3. If you answered No to 'sound', please answer this question... Do you consider that this policy is unsound because...**

Please select all that apply

- it's not positively prepared
- it is not justified
- it isn't effective
- it's not consistent with National Policy

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FC8 states that the Plan is intended to be 'in line with government guidance..... seeking to achieve sustainable growth'. Appendix 8 also states that this intended growth is the reason for determining a target housing development that departs significantly (+44%) from the HEDNA objectively based assessment - an assessment that does already include an allowance for economic growth for the Borough of Melton. However, no evidence is produced to justify the seemingly very optimistic projected growth within the Borough during the Plan period . As it stands, it appears to be based on little more than 'wishful thinking'. This is not persuasive. But is growth - even so called 'sustainable' growth, good? The reality is that no growth is sustainable for the planet. There is evidence galore that we are using up the finite resources at a totally unsustainable rate. Globally, soil is becoming not fit for purpose. Universally, wild life is being depleted. Now we exclaim 'Look, a butterfly!' Land fill sites are being filled with the detritus of consumerism. There is more plastic in the seas than fish. I could go on - but this is all general public knowledge. So why is it not acknowledged in the planning process? The planning process should focus on developing a strategy for DE-GROWTH during the Plan period. But I have heard nothing of any of this throughout the processes of developing the Melton Plan. Why not? Always, it has been 'Growth, growth and more growth'. Heads buried deep in that detritus of consumerism. So, where in the Melton Plan are the proposals for dealing with the consequences of this growth - all of these negative consequences? They will not be helped by expanding ready made sandwich factories or manufacturing increasing numbers of tinned dog food. The cost to

the environment of these is enormous. Just look in to the piles of waste created by the millions of discarded food tins and plastic wrappings. I

Please describe what changes you consider necessary to make the Melton Local Plan legally compliant or sound

Melton BC must look far more carefully at its proposal for growth - a proposal that is currently without any evidenced based strategy. Melton BC, boasting itself as the 'food capital' (a positive claim that presumably disowns the tainted pre-packed sandwich industry - the very negation of good food) - must put forward a coherent economic model more consistent with the limited HEDNA forecasts than with its own, unjustified and unsubstantiated , plans for economic growth.

## FC9 Indoor Sports Facilities

**Would you like to submit a representation for FC9 Sport?**

*Please select one item*

- Yes
- No

## FC10 Infrastructure Delivery Plan

**Would you like to submit a representation for the focused changes proposed for FC10: Infrastructure?**

*Please select one item*

(Required)

- Yes
- No

## FC13 Policies map

**Would you like to submit a representation for FC13 Policies Map?**

*Please select one item*

- Yes
- No

## Examination

**40. Can your representation seeking a change be considered by written representations or do you consider it necessary to participate at the oral part of the examination?**

Please select one item

(Required)

- Written Representations
- Participate at the Oral Examination

If you wish to speak at the examination, please outline why you consider this to be necessary?

Because I think there will be a greater opportunity for discussion and explanation about the specific issues I have raised. I will want to make it clear that, in principle, I support the objectives of the Melton Plan but that many of the directions it has had to take are the consequence of totally misguided government policies of development. They will have the consequence of frequently distorting desirable planning policies and longer term environmental outcomes. It is these misguided policies that underpin many of the issues I have raised in the comments at this stage of the consultation process.

## Receive news and updates

**48. If you would like to be updated on any Melton Local Plan news and updates, then please indicate your preferences below and we will make sure you are kept informed.**

Please select one item

(Required)

- Yes, send me regular news and updates
- No, please do not send me any emails

**49. Would you like to be kept informed of other council services? If so, please indicate your preferences below: (By ticking the box, you are opting in to receive news and updates from Melton Borough Council only for the options you have selected. We will not share this data with any other provider).**

(Required)