

MELTON BOROUGH LOCAL PLAN INQUIRY – January – February 2018

Representations by Long Clawson, Hose and Harby Parish Council

Pre-Submission Representor No: 61 (9 Representations)

Focussed Changes Representor No: 40 (8 Representations)

Wednesday 31st January 2018

Matter 2 Overall Spatial Strategy

Matters and Questions 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 (SS2 & 3) 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?**

1. The PC is generally supportive of the Local Plan's aims. However, in our view there are tensions and inconsistencies in how the plan seeks to implement the Borough Vision as expressed in 3.1.

2. With regard to the proposed Settlement Hierarchy and Settlement Roles, as a general principle the PC supports the overall concept of concentrating the bulk of new homes and employment land within the Melton town settlement (through urban edge extensions) as the most effective way to achieve sustainable development. In addition, the concept of a proportionate share of the balance of new development across the rural parts of the Borough, is both a logical and generally equitable way of supporting the long-term viability and sustainability of rural settlements of varying sizes. But the precise ratio of such a balance between town and rural areas is something that needs careful examination of the "on the ground" opportunities and constraints of each locality.

3. The PC is critical of the overall quantum and timing of new housing development within the Rural Service Centres and the pressure this is likely to place on rural landscape, heritage assets, drainage, traffic and rural services. The overall quantum of new housing is the subject of other Inquiry Matters (3 and 6) and need not be repeated here, other than to say the PC prefers the lower quantum in the HEDNA report and that this has informed the production of our Neighbourhood Plan which has reached an advanced stage. For the present discussion we address the geographical and timing issues inherent in the overall Spatial Strategy.

4. These matters were addressed in our Pre-Submission and Focussed Changes Representations. In principle the Borough Council's approach to creating an evidential base to the hierarchy and distribution of housing numbers is appropriate. But in practice the PC considers that this has not been followed through in sufficient detail. It appears that the evidence base has been given less weight than the drive to accommodate the rural housing numbers in a somewhat mechanistic way to help support the five year leand supply in the short term. Maintaining the sustainability of villages and meeting local housing need is a supported aim, but doing this at the cost of environmental, traffic and drainage harm does not constitute sustainable development. As a result the plan is not consistent with national planning policy.

5. The detailed impacts of housing allocations on the scale proposed on particular settlements is such that Long Clawson, Hose and Harby are being required to accommodate a greater quantum of new housing development than their infrastructure and environmental constraints can readily bear. The production of our Neighbourhood Plan has sought to strike a fairer balance between local development needs and consequential

impacts using local knowledge and participation to ensure sustainable development outcomes over the entire plan period.

6. It is the case that, due to the national policy pressure the Borough Council has been under in respect of being able to demonstrate a five year housing land supply, the recent grant of many planning permissions in Harby, Hose and Long Clawson is such that a majority of new housing development required to meet the HEDNA housing target has now already been met. Many rural settlements, including our own, are being “front loaded” in delivery terms. In our view this process has been the converse of the underlying principle in the NPPF that the Planning process should be plan-led (*NPPF para.17 first bullet point*). The PC is aware that once granted planning permissions cannot be rescinded (except at considerable cost) and hence we accept that “*we are where we are*” in this regard. However, this underlines the importance of the present discussion to ensure that the overall strategy is delivered having regard to both cogent local evidence and the views of local communities as expressed through their Neighbourhood Plans.

7. In conclusion, the PC would state that if, the HEDNA housing targets were used as the basis for the Rural Settlements provision (as the latest and most up to date objective assessment of need), then the overall Spatial Strategy might then be considered sound, justified and effective.

8. As we have said in connection with related Housing Need matters, if the TAHR is the preferred approach to housing need and provision, then consideration might need to be given to adjusting the ratio of town to rural provision from the current 65:35 ratio to something more akin to 70:30 in order to assist the delivery of Melton’s N and S Sustainable Neighbourhoods in general and the need for highways infrastructure and Affordable housing in particular, while also being seen to reduce the pressure on rural settlements which are in less sustainable locations and where no specific infrastructure provision has been identified.

9. If the Inspector was minded to agree with our conclusions the PC remains ready and willing to work with MBC to examine such potential moderate change to the LP in order to ensure that it can be found “sound”.

10. For ease of comprehension the PC’s Pre-Submission And Focussed Changes Representations are attached as APPENDIX A hereto.

LCHH PRE-SUBMISSION REPRESENTATIONS

REPRESENTATION**Reps 4.2.21-4.2.22 Policy SS2 and C1(A)**

Settlement requirement for Long Clawson at 127 is not based on a fair share of Objectively Assessed Need within the locality and is likely to lead to unsustainable oversupply and undue pressure on limited infrastructure and local services, while also causing harm to rural character and appearance of the village and its setting in the wider landscape. Hence the LP is UNSOUND in this regard. Not consistent with NPPF 47, 48 and 54

Suggested Change to Local Plan

Edit para 4.2.21 and delete para 4.2.22 and Tables 6 and 7 so that Long Clawson residual requirement reduces to 110 and consider any necessary adjustment to Rural Areas Windfall Allowance in paras 4.2.12 – 4.2.14 to reach strategic requirement. For example, an increase from 15% to 22% can be easily justified by past evidence and would make up any shortfall. If required evidence of 25 year annual windfalls at more than 25% to be provided

Reps re SS2 and Table 8

Table 8 shows Site Delivery Summary for Large Scale Sites in Melton Mowbray and the delay in delivery implicitly commits the delivery of new housing in the Rural Area to be 'front-loaded' within the first five years period. As the majority of this would be in rural villages rapid expansion at this rate is neither sustainable nor desirable, threatening social cohesion and being out of keeping with the historic rates of increase in the villages. The PC and local people are not averse to new housing development but it should be phased over time to allow infrastructure and community services to adapt and be improved where necessary

Suggested Change to Local Plan

Review and amend phasing of housing delivery to ensure that the finally agreed Allocation Sites in Long Clawson, Hose and Harby deliver new housing over 1st, 2nd and 3rd of the four five year plan periods. Ensure that this is expressly included within the adopted plan to assist transparent delivery monitoring.

LCHH FOCUSED CHANGES REPRESENTATIONS RE POLICY SS2 – July/Aug 2017

REPRESENTATION

The delivery of housing in the rural centres and specifically in Harby, Hose and Long Clawson is front loaded in the plan. It is the Parish Council's view that development of the numbers suggested in the HEDNA report and this Plan should be taken in the villages over the whole of the planning period. However, the detailed village site assessments and the Five Year Land Supply Report and Housing Trajectory Position Table C which supports the housing allocation policies show that whole of the allocated site development in this Parish and more generally all the rural hubs is assumed in the next 5-7 years. This does not allow the villages to absorb changes over the whole period of the plan as suggested by the community.

It is the Parish Council view that this rate of development is **unsustainable** across our Parish and so the Policy is **unsound and not positively prepared**.

Suggested Change to Local Plan

Revise the delivery timetable to spread the allocated site development schedule across the Parish over the remaining 19 year period of the Plan with the developments staggered across the Parish and each village or sites being developed over the whole of the Plan period and hence more slowly than in the current timetable.