

**MELTON LOCAL PLAN EXAMINATION  
EXAMINATION STATEMENT OF MELTON BOROUGH  
COUNCIL**

**8th January 2018**

**MATTER 2  
Overall spatial strategy**

## **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?**

- 2.1.1 Overview: the Local Plan provides a rationale for the growth of the Borough addressing its long term housing and economic development aspirations, and satisfying identified needs for housing, employment and infrastructure (see response to Matter 3 for details). It also seeks to address key planning objectives set out in national policy in the NPPF and local priorities and objectives, which are rehearsed in the Plan itself in Chapter 3.
- 2.1.2 The Plan addresses the Government's growth ambitions expressed in bullet point 3, paragraph 17 of the NPPF by identifying and satisfying the need for housing, infrastructure and economic development but also proactively driving and supporting sustainable economic development and responding positively to wider opportunities for growth, reflecting the weight that should be placed on the need to support economic growth through the planning system.
- 2.1.3 The Plan establishes key strategic priorities and recognises the strong interdependences that exist to allow economic, housing and infrastructure to be brought forward in an integrated fashion. It is particularly focussed on the need for the economic and housing strategies to be integrated (see also the Council's Matters 4 and Matter 10 Examination Statements). It promotes a level of growth that will safeguard and enhance the economic prosperity of the Borough and meet identified needs, and addresses the challenges of significantly boosting housing supply, widening the choice of housing whilst also delivering the most sustainable approach to development possible from the options available.
- 2.1.4 The Council considers that the Plan clearly conveys the roles that will be played by various parts of the Borough in meeting development needs through its range of land use allocations and other policies. There are strong, clear expectations made across a wide range of locations distinguishing their different contributions, and addressing the requirements of each for growth, conservation and environmental protection.
- 2.1.5 The Council consider that these allocations and other policies have strong and direct linkage to the strategic priorities and objectives set out in Chapter 3 and the various stages of the Sustainability Appraisal

have examined the contribution to these and other sustainability objectives.

**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?**

- 2.1.6 The Council consider that the development strategy, settlement hierarchy and apportionment of growth produce a sound framework for roles of different parts of the Borough question. It has been positively prepared, justified, effective and is consistent with national policy.
- 2.1.7 The extent of 'concentration' of new development towards Melton Mowbray (approx. 65%) is a firm articulation of the Plan's objectives. It was determined after consideration of a range of options at the 'Issues and Options' stage of the Plan's production ([MBC/G4b](#)). This made reference to past build rates and sensitivity testing upwards and downwards, and the broad support for an apportionment of around this scale from consultation responses. Analysis of the proportion of overall development would make the greatest contribution to the Plan's objectives was carried out in the Melton Local Plan Settlement Roles, Relationships and Opportunities study, April 2015 ([MBC/SS2](#)). It concluded that a significant intervention into past, market led, development trends was required in order to realise the Plan's objectives. It concluded that both a 65% and a 70% (an 'uplift' from an historic trend of 55%) apportionment to Melton Mowbray would maintain the necessary focus of development on the Main Urban Area and generate the critical mass of development needed to fund the infrastructure and economic priorities of the Plan. This apportionment would also allow for a range of allocations in alternative locations, providing a flexible land supply, supporting rural communities and providing housing choice thereby assisting with the Plan's vision and assisting with delivery of strategic issues 1,2,3,4,5 and 10 and strategic objectives 1,2,3 9,10, 12, 13 and 18.
- 2.1.8 Melton Mowbray has inherent advantages in terms of sustainability over all other locations owing to its range of facilities, employment and transport links as by far the most sustainable location for growth. It is the focal point of the Borough, accommodating over 50% of the Borough's population, acting as its main centre for employment, retail and leisure facilities and is several times the size of the Borough's next largest settlements. Part of the Plan's vision is to maintain and enhance this role.
- 2.1.9 However, it is recognised that highways conditions in Melton Mowbray are a hindrance to its growth and a significant infrastructure intervention is needed to 'unlock' the ability of the town to grow. This

relates directly to a key Plan objective (no. 10, page 20) of reducing congestion and enhancing the vitality and viability of the town centre (no. 3). The Highways evidence articulates the seriousness of congestion ([MBC/T2](#)) and need for strategic intervention ([MBC/T4](#)). Detailed analysis then followed of potential strategic solutions, in the form of new highways infrastructure in combination with other highways improvement measures (the 'Melton Mowbray Transport Strategy' (MMTS)) ([MBC/T5](#)), and finally identification of a preferred route for a distributor road as part of the MMTS ([MBC/T9a](#)).

- 2.1.10 A strategic intervention at this scale is a major commitment. Accordingly, a quantum of development sufficient to facilitate provision of the transport infrastructure necessary to facilitate housing and employment land growth is required. The Plan allocates two 'sustainable neighbourhoods' on the north and south of the town which would accommodate the greater part of the growth proposed for Melton Mowbray (1500 and 1700 respectively, and together, 3200 of the 4000 proposed for Melton Mowbray (the 65% apportionment)). These have been examined by the Local Plan and CIL Viability Study, May 2017 ([MBC/WP5](#)) and are demonstrated to be capable, in financial terms, of supporting infrastructure requirements of this scale. Together, Policies SS2, SS4, SS5, new IN1 allow fulfilment of the Plan's vision and several of its strategic objectives.
- 2.1.11 The viability exercise took into account other infrastructure requirements associated with major development (e.g. educational capacity, open space, etc.) and has led to a consequential reduction in Affordable Housing contributions (under Policy C4 ([MBC/G4e](#))) in the sustainable neighbourhoods (SN's). Whilst the Council recognises this compromises a different Plan objective, it considers it to be justified because unless development in Melton Mowbray is 'unlocked', there will be less growth overall, leading to less delivery.
- 2.1.12 Whilst delivery of the Melton Mowbray SNS is considered in detail In the Council's Matters 4 Examination Statement, it is generally understood that they are more difficult to deliver than smaller stand alone sites, owing to the complexities of coordinating different land owners, etc. The Council has sought to adopt a positive approach to facilitating at least some elements of the SN's to proceed in advance of completion of the highways infrastructure and this is set out in the Melton Mowbray Interim Highways Contributions Position Statement, Dec. 2015 ([MBC/T3](#)) in recognition that early delivery is necessary in order to fulfil the emerging Plan's objectives.
- 2.1.13 The remaining sites in Melton Mowbray and certainly the allocation sites in most other settlements are very much less complex and can be

delivered more easily. The analysis included within the Five Year Land Supply and Housing Trajectory Position ([MBC/HS1](#)) and its Dec 2017 update ([MBC/HS1A](#)) clearly demonstrate this and also the key role that such sites provide in terms of the objectives of delivering housing and maintaining a 5 year land supply. This in turn reinforces the need for a significant proportion of development within the Borough to be accommodated outside Melton Mowbray and mitigates the extent to which Melton's apportionment could be greater. Their inclusion, in the quantities identified, support realisation of the Plan's ambitions for housing growth and sustainable patterns of development and particularly assists with priority objectives 1, 2 and 13. This configuration was assessed as part of the Sustainability Appraisal process and performed well – equal to or better than the suggested alternatives under this exercise ([MBC/WP2d](#)).

- 2.1.14 Turning to the allocation to other settlements, the Plan proposes to accommodate the remaining 35% (approx.) by allocating to specifically identified sites. The selection process for the *locations* of these sites was carried out initially in the Settlement Roles, Relationships and Opportunities study, April 2015 ([MBC/SS2](#)) but was reviewed following consultation responses in response to 'Preferred Options' in Spring 2016 ([MBC/SS2](#)). The selection criteria reflected the vision and objectives of the Plan – especially when viewed in the context of the overall context of the Spatial Strategy. The allocations, both cumulatively (35% approx.), and relative in scale to those for Melton Mowbray, support the vision of the Plan in terms of the central role of Melton Mowbray whilst allowing sufficient development to support communities (Plan objective 13), offer housing choice and, importantly, support delivery. The scale is, proportionately, a significant intervention from past build rates in the rural area (traditionally 45% of the whole Borough); an intervention that similarly reflects the focus upon Melton Mowbray. The relatively modest and, proportionately, reduced quantities that are allocated to a wide range of villages also serve to assist with environmental elements of the Plan's vision and objectives, such as its the attractiveness of the Borough, its rural character and the desire to maintain the quality of its environment.
- 2.1.15 The policy associated with windfall development (SS3) is addressed in more detail in the Council's Matter 6 Examination Statement. An allowance has been made for windfall development in recognition that smaller settlements may have particular needs that would be met by new, sustainable development and that circumstances may change over the life time of the Plan. However, the reliance on this contribution is considered to be very conservative at 20 dpa, which is significantly lower than has been consistently delivered in the Borough in recent years.

- 2.1.16 However it should be stressed that it includes criteria that reflect national policy and the definition of sustainable development. As such, the Council does not consider that Policy SS3 compromises the sustainability of the Plan or moves away from its vision or objectives, but rather, that it is a mechanism that further complements its sustainability in specific circumstances, a reflection of National policy (NPPF paras 7, 48 and 55 in particular) and pursuit of several key objectives.
- 2.1.17 In conclusion, the Council considers its development strategy, settlement hierarchy and broad apportionment of growth are consistent with the Plan's vision and strategic objectives. It considers that the apportionment to Melton Mowbray and other settlements to be the approximate optimum realistically possible; greater concentration in Melton Mowbray or to a smaller range of villages could start to detract from the ability to fulfil overall plan objectives arising from issues relating to delivery in the short and long term, arising from reduced choice, greater competition within the housing market and potential localised 'saturation'.

**QUESTION 2.1(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]?**

- 2.1.19 The development strategy and the settlement hierarchy are based on robust evidence. These include the settlement roles and relationship studies carried out initially in April 2015 after the Issues and Options stage consultation and then reviewed and updated regularly for subsequent stages of the local plan in May 2016 after the Emerging Options stage consultation and consideration the settlements roles and relationships by the Council in September 2016. These are **MBC/SS2**, **MBC/SS3a-c** and **MBC/SS4a-c** respectively,. And the associated SA reports that helped to inform them are **MBC/WP2e** .
- 2.1.20 The review led to a revised approach in which allocated sites were assigned to those locations (villages) which contained 'key services', which the Council considered was a better gauge of the relative sustainability of villages than the somewhat complex scoring system set out in Settlement Roles, Relationships and Opportunities study, April 2015 (**MBC/SS2**). The facilities themselves are considered to be the

key features that distinguish the sustainability of villages in relative and absolute terms. They were also sufficient to allow a broad range of locations to be identified in order maintain development opportunities, again assisting the objectives of promoting sustainable communities, housing choice, delivery and 5 year land supply.

- 2.1.21 This process relied on empirical evidence regarding the presence of services and facilities and/or accessibility to them. The services concerned (primary school, broadband, access to employment and a community facility) were those considered the most critical to nurture sustainable communities and sustainable patterns of development. Their selection is considered to be a direct reflection of national planning policy including:
- managing patterns of growth (NPPF para. 14),
  - promoting sustainable transport choices (para. 29/30/35), minimising journey lengths to access key activities (37),
  - utilizing and supporting the best broadband provision (para. 42/43)
  - providing the best conditions to deliver a significant boost in housing supply and provision of housing that meets identified existing demographic and economic needs now and in the future (Chapter 6, paras 49 and 55 in particular),
  - supporting local facilities (para. 70).
- 2.1.22 One aspect of the spatial strategy has been the allocation of a quantum of housing to villages on the basis of their existing population. In addition to the issues of housing choice and deliverability discussed above, this is in recognition that those identified as Service Centres or Rural Hubs do not possess a profoundly different range of services from one another, especially the 'key services' which have been used for their identification. However, a consequence is that it has 'tilted' the allocations towards the larger settlements, which naturally are those with the better range of services, facilities and accessibility. For example the villages of Bottesford (including the adjoining Easthorpe) and Asfordby (including the adjacent Asfordby Hill) have stronger availability of services and are more accessible, and between them they account for some 36% of all of the allocations. Therefore, there is an inherent relationship of the approach between the scale of allocation and the relative sustainability of the villages, further enhancing the Plan's 'sustainability credentials' and adherence to national policy.
- 2.1.23 A further reason why site allocations of a scale of 10 houses or more was used is their ability to be able to support infrastructure and affordable housing through developer obligations and subsequently CIL. This, in turn, ensures that they can make their contribution to the objectives of the Plan and National Policy (particularly NPPF paras 55

housing supply and 157 infrastructure provision) whilst other models, for example, a more dispersed (numerous smaller sites) or 'passive' policies, could not do so, due to limitations on developer contributions on smaller sites arising from PPG.

- 2.1.24 The individual site selection methodology is addressed in the Council's Matter 5 Examination Statement, but it is noteworthy that the criteria applied for their selection included environmental, heritage, infrastructure, design and deliverability measures. These factors, and the site specific policies found in Policy C1A and C1B Appendix 1, further reflect the fact that that allocations have been made on a firmly evidential basis and strongly accord with national policy on these specific subjects, in addition to the wider objectives described above, and are deliverable. Evidence on their deliverability is provided in the Council's Matter 6 Examination Statement.

### **QUESTION 2.1(iii)**

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

- 2.1.25 As explained above, the 'proportionate approach', based on population size, is an effective method for both providing housing choice and creating and in-built 'tilt' to direct new development to the most sustainable locations. Greater concentration into higher order service centres would be inappropriate as insufficient suitable sites are available in some key locations (insufficient sites in Bottesford and Asfordby, for example, have resulted in a modest shortfall against the intended distribution), and would start to diminish housing choice and deliverability, undermining the objectives of NPPF para 50.
- 2.1.26 Easthorpe and Thorpe Arnold have been included as 'Rural Hubs' owing not to their individual service provision, but their very close proximity to locations with a strong range of community facilities, and as such, reflect the suggestion in NPPF para. 55.
- 2.1.27 The population of each settlement was based upon Census Super Output Areas (SOAs) as the most reliable source. The Council recognise that SOA's are not a 'perfect fit' as a measure of settlement population because they sometimes include the rural hinterland associated with a village. The Council was questioned on this through representations, and alternatives were suggested such as use of the electoral roll. However, in the September 2016 review of the Spatial Strategy, it was concluded the SOA's remained a better approach due to the reliability of the data source (the electoral roll suggestion, specifically, was declined because of the exclusion of under 18's).



- 2.1.28 Table 4 is considered to be very clear in its specification but it needs to be read in conjunction with Policy C1/C1A to understand the full effects of its application. Table 4 explains the proposed apportionments following the 'proportionate approach' described above, and is then adjusted for completions and unfulfilled permissions that have taken place up to 31/3/2017 to create a 'residual requirement' for each village. The right hand column of this table is considered to be a very clear and precise expression of what is required.
- 2.1.29 It is considered that Table 4 is clear for its purpose and both the evidence behind it, and the methodology applied, are sound, justified and in accordance with National Policy.

## **QUESTION 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?**

- 2.2.1 The submitted Policy SS3 is as amended by Focused Change 1.2. Its purpose is to allow some limited development that meets identified needs to be permitted on unallocated sites in rural settlements, so as to ensure or enhance the sustainability of these settlements. This aligns directly with the overall objectives of NPPF, to contribute to the achievement of sustainable development (NPPF paras 6 and 7), and is a better balance between allowing development that is needed locally and controlling unsustainable development than the PSD version of the policy.
- 2.2.2 Policy SS3 is an element of the Council's response to para 10 of the NPPF, taking account of local circumstances and responding to different opportunities for achieving sustainable development in different areas. The sustainability assessment of the amended policy scored the policy positively overall ([MBC/WP2g](#), page 154 onward), and representations in support of the policy have welcomed the opportunities it could provide small local builders, with potential positive local economic sustainability effects resulting.
- 2.2.3 The second clause of Policy SS3 and paragraph 4.2.16 give guidance on the small scale of any housing schemes that are likely to be acceptable, proportionate to the scale of the host settlement. This approach has been designed to be flexible so that it can take account of very locally specific needs and circumstances, recognising these may change over time, but will also have the effect of limiting the likelihood of adverse consequences of repeated application.
- 2.2.4 As discussed above, the policy is not regarded as a compromise to the sustainability of the Plan, but one that enhances it. The requirements

introduced by the criteria, particularly criterion 1, are themselves expressions of sustainability and reduce the likelihood of adverse consequences from repeated application within the remaining plan period. Also, the policy is written flexibly enough that greater constraint can be applied should it be the case that the overall spatial strategy is likely to be compromised.

- 2.2.5 Annual monitoring of the size and cumulative total of development taking place in individual settlements will determine whether or not there is a risk of the overall plan strategy being undermined by the operation of this policy. Significant deviation from the 'approximately 65/35%' stated in Policy SS2 would warrant a review of policy's continued inclusion in the plan.
- 2.2.6 In respect of any employment development the policy provides further guidance as to how Policy EC2 will be implemented. On reflection, criterion 1 may be unduly onerous and undermine the effectiveness of Policy EC2. Therefore the following modification to criterion 1 of Policy SS3 is suggested to address this:

**1. The development provides housing ~~or economic development~~ which meets a local need as identified in a Neighbourhood Plan or appropriate community-led strategy or housing ~~or economic~~ needs assessment; and/or**

END